



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications Consultation

Report of Representations - Volume 4

December 2014

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08 POLICY CS4 TARGET

Representations relating to Policy CS4: Economy and Employment,
specifically relating to employment targets

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS4 TARGET 001	1	123	A G Wortley
POLICY CS4 TARGET 002	1	145	Anne Gibbons
POLICY CS4 TARGET 003	1	156	Barbara Stephenson
POLICY CS4 TARGET 004	1	199	Darren Seddon
POLICY CS4 TARGET 005	1	214	Dennis Crehan
POLICY CS4 TARGET 006	1	230	Elaine Rowe
POLICY CS4 TARGET 007	1	279	Irene Davis (3)
POLICY CS4 TARGET 008	1	280	Irene Rimmer
POLICY CS4 TARGET 009	1	62	Janet Gore
POLICY CS4 TARGET 010	1	299	Janet Rourke
POLICY CS4 TARGET 011	1	314	Jennifer Mullin
POLICY CS4 TARGET 012	1	341	Julie Anne Parker (1)
POLICY CS4 TARGET 013	1	351	Katy Andrews
POLICY CS4 TARGET 014	1	62	Lesley O'Hara
POLICY CS4 TARGET 015	1	386	M E Wortley
POLICY CS4 TARGET 016	1	488	Rachel Freeman
POLICY CS4 TARGET 017	2	96	Ray Davis (1)
		96	Ray Davis (4)
POLICY CS4 TARGET 018	2	517	Sarah-Jane Jarman
		554	Trevor Jarman
POLICY CS4 TARGET 019	1	542	Suzanne Lewis
Total	21		

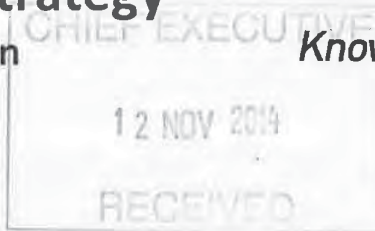


Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

Knowsley Council



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	A. G. WORTLEY	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	SAVE WHISTON GREEN BELT	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

SAVE WHISTON GREEN BELT.

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KGBS 14

Paragraph Ref

EC1

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Council's philosophy about new housing contributing to economic development and population retention is fundamentally flawed. See first paragraph in document KGBS 14, SA objective EC1 (above) regarding 'none of the options for land to the South of Whiston include an employment element. Many encourage further investment in the area, sustaining existing local employment and also potentially bringing new jobs into the area is not a sound reason for economic development, competitiveness and productivity of businesses as stated Document KGBS 14, SA Objective EC1.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Geni Puhlos recently has made comments to
Planners regarding Mitsidny Green Belt.
Please listen to his views
ONS has recently produced new figures on
population, please take notice and take them
into account.
Reconsider the public inspection.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature

[Redacted Signature]

Date

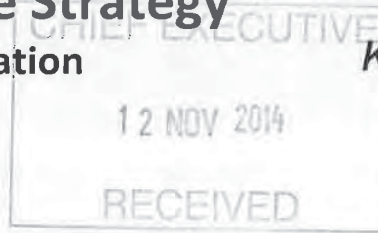
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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	ANNE GIBBONS	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

SAVE WHISTON GREEN BELT

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KG-BS 14

Paragraph Ref

EE 1

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Councils philosophy about new housing contribution to economic development + population reduction is fundamentally flawed! See 1st paragraph in Document KG-BS.14, SA Objective ECI (above) outlining 'None of the options for land to the South of Whiston include an economic employment element

May encourage further ~~investment~~ investment in the area, sustaining existing local employment + also potentially bringing new jobs into the area is not a sound reason for economic development, competitiveness + productivity of business as stated in document KG-BS 14, SA objective ECI

Continue on a separate sheet if necessary...

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Eric Pickles recently has made comments to planners regarding protecting green belt - please listen to his views.

ONS have recently produced new figures on ~~population~~ population - please take these into account.

Reconsider the public inspection.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature

[Redacted Signature]

Date

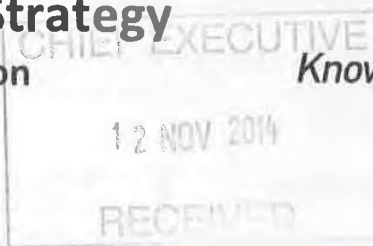
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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	
Name	BARBARA STEPHENSON	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

B. STEPHENSON

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KGBS 14

Paragraph Ref

EC3

2. Do you consider that the proposed modification is ? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Current Whiston Village area and surrounding independent stores are underused due to proposed shopping centre outlet. If outlet is built, area was created after local stores would be forced to close & lead to disused buildings and unemployment for local people with the rest of Whiston Village. Employment opportunities for best population of South Whiston are overestimated as all jobs have to go out to tender, therefore any contractor from around the D.K. may win a contract leading to various building development firms coming in rather than using local trades people/companies/individuals or sub-contractors. Document by S.L. SA Objective EC3.

The number of times that words like my, proposed & possible occur in the Core Strategy Plan in the context of future employment opportunities is the wrong way to stagger in other words all talk of future jobs with an operational context with no firm plan and certainly not quantified that any will be created. So the want to build houses in the hope that jobs will happen - somewhere, somehow - this is creating an eye - Cheshire Schools. Knowledge Council wants to promote "households with

Continue on a separate sheet if necessary

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

It was short building on Green Belt land, we will have no green spaces for animals & flora. I thought it was ~~illegal~~ illegal!!!

Continue on a separate sheet if necessary

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a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



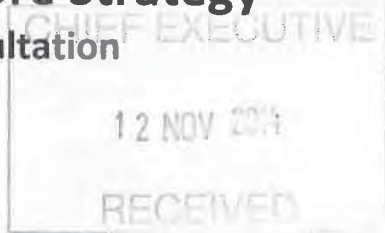
Date



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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	DARREN SEDDON	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

DARREN SEDDON

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

WGRS14

Paragraph Ref

EC3

2. Do you consider that the proposed modification is ? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Whiston Village is undermined owing to large retail park at Prescot. Further outlet would lead to local shops closing with disused buildings becoming unsightly and dangerous. If outside contractors come in they would use outside labour & not local people. Future employment opportunities for locals is overstated & aspirational. There are no guarantees and therefore people will come to the area with no or little employment opportunities. "Executive aspirations" are unachievable in this area.

Continue on a separate sheet if necessary

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- 1) Take into account Eric Pickles M.P. comments on Oct. 16 2014
- 2) Take into account O.N.S. Population figures for 2014
- 3) Re-convene public inspectors & carry out up to date transport survey.

Continue on a separate sheet if necessary

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/14



Knowsley Council

Knowsley Local Plan: Core Strategy

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Dennis Crehan	
Job Title (if appropriate)	Retired	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS14

Policy Ref

KGB 14

Paragraph Ref

204/8

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is **not** legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

PLEASE NOTE: Personal information provided as part of a representation should be treated as confidential. If you wish to provide information you wish to be treated as confidential, please contact the Data Protection Officer at the local planning authority. At the discretion of the local planning authority, you may be asked to provide a separate sheet for this information. **Continue on a separate sheet if necessary.**

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Before giving permission to build on this land I would like you to consider the impact on the local wildlife and the destruction of the ~~rural~~ environment. The premise of providing housing in a semi-rural setting does not make sense if the ~~rural~~ setting has been destroyed. Also to build on any green belt when there is the possibility of world food shortage is madness. The impact also of this project would be to the village itself because the centre would shift to the new shops leaving the old shops derelict.

Continue on a separate sheet if necessary...

All the promise of new jobs is as usual Pie in the sky and is not supported by any evidence

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b) Yes, I wish to participate at any further public hearing

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Signature



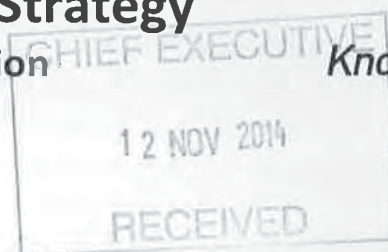
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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title Mrs	Mrs	
Name E. Rowe	Elaine Rowe.	
Job Title (if appropriate)	Retired	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation Elaine Rowe

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref MOSS
MOGS Policy Ref CS1 & CS5
SUEADSI
5032 Paragraph Ref 3-20 3-23
3-23 3-34
3-26 4-10

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. Some residents have only just found out about the plans. I would maintain that the policies outline in CS1 & AD51 and the SUE document are out of step with public opinion. I would like that public meetings with the inspector be re-considered to take into account the views of local residents and stated by the government in the Localism Bill. I consider the Council have not utilised empty properties & brown field sites in its calculations of housing needs. The council have not considered infrastructure improvements to cope with the influx of people.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Take into account guidance from
Eric Pickles MPOCT 16 2014
Take into account ONS Population
figures for 2014
RE - Convene Public Inspection
carry out up to Date Transport
survey.

Continue on a separate sheet if necessary...

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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/14



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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Mrs Irene Davis MRS IRENE DAVIS	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

Part B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Please see attached sheets in support of my view that the plan is not sound due to conflicts and is not legal because it doesn't take into account latest Government advice. It is also using out of date information; population projections from the ONS and an out of date Transport assessment

SEE COMMENTS IN RED.

Continue on a separate sheet if necessary...

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

It is also using out of date information; population projections from the ONS and an out of date Transport assessment. The council should carry out a new Transport assessment and a new Population projection. Also, protect green belt and use Brown field sites which would supply enough housing by their own admissions.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

25/10/14

KNOWSLEY LOCAL PLAN: CORE STRATEGY

Submission and Objections regarding proposed modifications

P R Davis
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

Implications for South Whiston and Prescot Town Centre – Please see my comments highlighted

3.20 The appraisal concluded that the Spatial Strategy for Knowsley is likely to have a largely positive impact on the sustainability objectives. In Particular, it is envisaged that the Development Principles (CS2) are likely to have a major positive impact in the long-term on the objectives relating to health; mitigating climate change; and reducing the need to travel. It was concluded that the policies for Housing Supply (CS3), the Economy and Employment (CS4) and Town Centres and Retail (CS6) would have a positive impact on a range of objectives, particularly those that relate to social and economic issues and the appraisal also predicted that the policy for Green Infrastructure (CS8) would have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; adapting to climate change; and green infrastructure.

I would question how removing green belt can have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; and adapting to climate change.

3.21 The appraisal of the Proposed Submission document did however consider that a number of the policies would have an uncertain or negative impact on some of the objectives. For instance, it concluded that a number of the policies, such as the Spatial Strategy (CS1) and Green Belt (CS5) could have an uncertain impact on a number of environmental objectives in the longer term due to the potential for it to result in the release of a number of sites in the Green Belt.

How can this statement hold true to statement at 3.20 one is negative and one positive?

3.23 Nevertheless, the appraisal of the Proposed Submission document acknowledged that as each of the policies would result in built development and would therefore lead to some carbon emissions associated with the construction and operation of this development, their impact on the objective relating to mitigating climate change is uncertain. It also considered that there is some uncertainty over the impact of the policy for Knowsley Industrial and Business Parks (CS11) on the objectives relating to air quality and need to travel, particularly as there is limited information available on the amount and nature of the new employment uses that would be delivered. In addition, due to

both policies resulting in the provision of B1 office development in an out of centre location, the impact of the policies for Knowsley Industrial and Business Parks (CS11) and South Prescott (CS13) on the objective relating to the vitality and viability of Knowsley's town centres was also deemed to be uncertain.

The actions contained within the Local plan are identified here as uncertain and would certainly fail in meeting our green credentials as the development of green belt out of centre would increase the carbon impact.

3.24 On the whole, the appraisal of the Proposed Submission document concluded that the Thematic Policies performed well in the SA process. In particular, the policies relating to housing and the accommodation needs of the community (CS 15 – CS18) were considered to all have a positive impact on the objectives relating to poverty and deprivation; health and the provision of good quality housing; the policies relating to Sustainable and Low Carbon development (CS22) and Renewable and Low Carbon Infrastructure (CS23) were considered to have a major positive impact on the objective relating to mitigating climate change; and the policy for Greenspaces and Trees (CS21) was considered to have a major positive impact on the objectives relating to landscapes; biodiversity; adapting to climate change; and green infrastructure.

How can this point be made as positive when the document already highlights the possibility of a negative impact on all of the CS range of reports?

Proposed Modifications to the Submission Local Plan

3.26 The initial Local Plan Examination hearing sessions took place in November 2013. Following these hearing sessions, the Inspector appointed to undertake the examination issued his interim findings in January 2014. In response to these findings, and also to reflect other required amendments, the Council proposed a number of modifications to the Plan. These modifications included a revised approach to the release of Sustainable Urban Extensions, a reduction in the employment land target for the plan period, a reduced target level of affordable housing provision on sites in the urban area and the prioritisation of different forms of developer contributions in instances where viability is insufficient to fund all the non-mandatory requirements set out in the Plan.

The reduced level of affordable housing can only be in the favour of developers, government guidelines call for a level of 25%. A reduced level of employment land means that the target of job creation must be flawed.

4.10 The scale of any impact on an objective has been predicted taking into account the size of the site and the quantum of development it is likely to accommodate. In relation to housing sites, where an approximate number of dwellings that could be accommodated on a site have not been provided by the promoter of the site, its yield has been estimated based on the standard multipliers used for assessing the capacity of sites within the Strategic Housing Land Availability Assessment

(SHLAA) and the Green Belt Study. For sites in excess of 2 hectares in site size, this assumed a 75% net developable area and a density of 30 dwellings per hectare¹³.

In the case of South Whiston, 75% of the proposed area of 110.3 hectares minus 27.6 = 82.70 hectares @ 30 dwelling per hectare is 2481 dwellings. The council have only declared 1503 dwellings. This calls all of the council's estimates of housing into question. The proposal to bring forward Green Belt release on such a scale will also produce many more houses than the SHLAA calls for. Also the government has in October 2014 told councils to use the NPPF to protect Green Belt.

“Councils must protect our precious green belt land”

From: [Department for Communities and Local Government](#), [Brandon Lewis MP](#) and [The Rt Hon Eric Pickles MP](#)

First published: 4 October 2014 # Last updated: 6 October 2014

Part of: [Improving the energy efficiency of buildings and using planning to protect the environment](#), [Climate change](#), [Environment](#) and [Planning and building](#)

SUE 2c – Sustainable Urban Extension: South of Whiston and Land South of M62

5.44 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the further modifications to the policy would remove the specific reference to housing in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require the development to provide a wider choice of housing in the area. Consequently, given the substantial capacity of the site, it is considered that the policy has the potential to have a positive impact on the objective of providing good quality housing and this impact would become increasingly significant as the development is built out. The policy also promotes a significant amount of employment development in this location and, due to the scale of development that would be delivered, could also encourage further investment in the area, generate employment and training opportunities in the construction sector and help sustain existing local facilities. As such, the policy could also have a major positive impact on the objectives that relate to business growth and productivity; and reducing unemployment; and some positive effect on the objectives concerned with poverty and deprivation; and education and skills.

Any employment gains in the building industry are short term and will have little impact on local unemployment. With the reduction in affordable housing previously mentioned (3.26) how can the massive scale of over 2400 houses have a beneficial effect, without considerable investment in infrastructure. There are only two local primary schools, I question if they would have the capacity to cope with this massive

development. Already in (3.21 & 3.22) the question of environmental and green space negative impacts have been mentioned, a development on this scale would surely cause a negative impact on all those areas mentioned.

5.45 The policy would also result in residential development being directed to a location that is within reasonably close proximity of established employment areas and a number of local facilities, including primary schools, a GP and health centre and a local shopping centre on Greenes Road. It also requires new development in this location to contribute towards public transport provision and improve links to Whiston railway station. As such, the policy could have a positive impact on the objectives that relate to improving access to services and amenities; and the use of more sustainable transport modes.

Local transport in Whiston is very poor and anyone who is not a car owner and lives on Windy Arbor Road, has already seen a reduction in buses available since de-regulation. To suggest building a large number of houses will increase local transport is naïve in the least and downright misleading. The development by Halton in Cronton has not seen a vast increase in bus traffic and hardly a bus is available late at night. The local shopping centre mentioned is log jammed at busy times with cars and deliveries by Artics to Tesco and the odd truck using Whiston as a short cut from Tarbock island. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.46 Given the scale of development promoted, the policy has the potential to generate a significant amount of additional expenditure which could support nearby local centres. As such, the policy has the potential to have a positive impact on the objective that relates to the vitality and viability of town and local centres. In addition, a key element of the proposals for the site is the creation of a country park with associated footpaths, cycleways and bridleways, and the policy also requires development in this location to encourage walking and cycling and provide public open space. As such, it is considered that the policy could support participation in sport and recreation and could therefore have a positive impact on the objective that relates to health.

Why it is necessary for so much land to be considered for removal from the Green Belt, to the south of the M62. Only about a third of this is reported to be for development. It has been said that the rest will form a Country Park, on the Old Cronton Colliery site. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.47 The policy would however have the potential to have a negative impact on a number of objectives. In particular, it directs development to a greenfield site that contains large areas of Grade 2 Best and Most Versatile agricultural land. As such, the policy would have a major negative impact on the objective that relates to protecting land and soil. Directing development to this location would also have a negative impact on the objective that relates to protecting landscape character;

and could have a negative impact on the objective that relates to biodiversity by resulting in the loss of priority habitat and/or by placing pressure on nearby Local Wildlife Sites. Nevertheless, there is only a low level of certainty about the impact of the policy on this objective.

There is a clear admission here of the negative impact of taking this area out of Green Belt. With the increase in Global commodity prices locally produced food is more important. The need to remove Grade 2 Best and Most Versatile agricultural land from the Green Belt is not proven and 5.47 highlights the negative impact of this policy.

5.48 The policy will result in development taking place in a location that is within reasonably close proximity to local facilities and would also require the development to contribute towards public transport, walking and cycling. However, the construction and operation of this development would inevitably result in carbon emissions and would inevitably generate a significant number of vehicular trips and associated emissions. Consequently, the policy has the potential to have some negative impact on the objectives that relate to mitigating climate change; and protecting air quality.

There is a clear admission within (5.48) that the development proposed is identified as having a negative effect on carbon emissions and would certainly fail in meeting our green responsibilities. The mention of a significant number of vehicular trips bears out our belief that there would be a serious impact on traffic congestion within Whiston.

5.49 The policy would also have an uncertain impact on some of the sustainability objectives. Specifically, the policy would result in development being directed to a location that is in close proximity to a number of heritage assets. Nevertheless, due to the scale of the site, there may be scope to incorporate an adequate buffer around these assets to protect their setting. In addition, the policy requires development in this location to comply with Policy SUE 2 which, amongst other things, requires new development to protect and enhance historic and architectural assets. As such, it is uncertain whether the policy would have a significant impact on the objective that relates to preserving and enhancing Knowsley's built heritage.

These comments can only reinforce the need for a structured approach to any release of Green Belt and more time should be spent understanding all the issues before we take a decision that cannot be revoked.

5.50 Although the policy directs development to a greenfield site which has the potential to function as part of the Borough's Green Infrastructure network, it also involves the creation of a country park and the requirement for development in this location to be subject to a master planning should ensure the appropriate retention and provision of objective that relates to providing and conserving green infrastructure is also considered to be uncertain. Areas of

Green Infrastructure. As such, the impact of the policy on the objective that relates to providing and conserving green infrastructure is also considered to be uncertain.

(5.50) Again mentions uncertainty in the council decisions and in my view at least suggests they don't know what will happen when developers have free reign to build on our Green Belt. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.51 Similarly, although the policy would result in development taking place in the vicinity of a number of water bodies, there is limited certainty over whether this would impact on the water quality of these waterbodies. Consequently, it is considered that the policy would also have an uncertain impact on the objective of protecting, improving and where necessary, restoring the quality of inland, and estuarine waters.

We have yet to see a definitive study of water quality after development, and we suggest the loss of some 110 hectares of open countryside will seriously impact local wildlife

KGBS 14 - South of Whiston

5.82 Policy SUE1 identifies South of Whiston as a SUE primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development including the Local Wildlife Site but excluding Public Open Space. This option would not introduce any phasing restrictions but would include a policy requirement for ancillary facilities (e.g. Retail and Public Open Space). The second option considered was to allocate the site for housing development with site-specific allocations for retail and Public Open Space provision but no phasing restrictions. The third option was to allocate the entire site for housing development with no phasing restrictions.

We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision.

5.83 The appraisal concluded that each of these would have a similar impact on a number of the sustainability objectives. In particular, given the substantial capacity of the site, it concluded that each option could have a major positive impact on the objective of providing good quality housing and that this impact would become increasingly significant as the development is built out. However, by introducing a potentially inflexible approach to the provision of open space and retail, the appraisal recognised that Options 2 could have an adverse impact on the deliverability of the site which reduces the level of certainty that the option would have a major positive impact on the objective. Due to the size of the area and the quantum of development it could accommodate, each of the options could also generate a number of employment and training opportunities in the construction sector and

could stimulate further investment in the area. As such, the appraisal noted that each of the options has the potential to have a positive impact on the objectives that relate to reducing deprivation; skills and training; business competitiveness; and unemployment.

Once again there is too much that is hopeful and of little certainty and i would re-iterate my previous comment. We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision. This decision is at odds with local Public opinion and also at odds with the localism bill.

5.84 The appraisal considered that each of the options would also result in development taking place in close proximity to a range of local facilities and amenities including primary schools, a GP and health centre and a local centre on Greene's Road and development in this location could make a contribution to the continued viability of these services and facilities. Options 1 and 2 would also support the provision of certain facilities/amenities within the site. As such, each of the options could have a positive impact on the objective that relates to access to services and amenities but there is a higher level of certainty that Options 1 and 2 would have a positive impact on this objective due to these options resulting in the provision of facilities on-site. Given the significant capacity of the site, each of the options also has the potential to have a positive impact on Knowsley's town centres and the local centre on Greene's Road by increasing levels of expenditure in these centres. As such, each option could have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town centres

The retail centres mentioned at Greenes Road is a small satellite and little could be done to expand it. Increasing the footfall would inevitably increase traffic in what is already a very congested area. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.85 The appraisal did however recognise that each of the options could impact upon the setting and significance of a number of heritage assets and have a negative impact on the objective that relates to Knowsley's built heritage. These assets are however located towards the edges of what is a large site and there may be scope to incorporate an adequate buffer around these assets to protect their setting. Consequently, there is only a limited level of certainty that each option would have a negative impact on this objective. By resulting in the loss of a significant area of greenfield land and by potentially placing pressure on areas of ecological value, each option could also have a negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the

objective that relates to air quality. There is however a lower level of certainty that Options 1 and 2 would have a negative impact on this objective as both of these options would support the provision of some facilities on the site which could reduce the need to travel and associated vehicle emissions. Each option could also have a major negative impact on the objective of adapting to climate change; a negative impact on the objective of mitigating climate change; and an uncertain impact on the objective that relates to protecting water quality.

Once again the councils own comments highlight the negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the objective that relates to air quality, and also increase congestion.

5.86 Each option would result in the loss of a substantial area of greenspace, sections of which are used for informal recreation, and could therefore reduce opportunities for participation in informal sport and recreation and thereby have a negative impact on the objective that relates to health. Nevertheless, Options 1 and 2 would provide support for the retention/provision of areas public open space and could therefore have a positive impact on the objective. Conversely, Option 3 would not support the retention/provision of areas public open space and would therefore have a negative impact on the objective. Options 1 and 2 would also result in the provision of some facilities on the site which could help reduce the need to travel and have a positive impact on the objective that relates to reducing the need to travel and improving the use of more sustainable transport modes. By contrast, as Option 3 would not directly support the provision of on-site facilities, this option has the potential to have a negative impact on this objective.

Once again the councils own comments highlight the negative impact on outdoor activities and recreation for local people.

CS5 - Green Belt

5.133 The revised policy would have a largely similar impact on the sustainability objectives to the version of the policy included in the Core Strategy Submission document.

The use of Green Belt for building is overwhelmingly opposed by the majority of residents. The reason used by the council for use and early release of Green Belt does not meet the NPPF in regard of the 5 purposes of Green belt and Extraordinary needs do not exist, to remove Best and Most Versatile agricultural land. It is also at odds with latest government thinking. See 4.10

5.134 The policy would continue to protect the majority of Green Belt from inappropriate development but, as with the previous version of the policy, would support the identification of a series of sites for release from the Green Belt to ensure that there is sufficient housing and employment land to meet the needs of the Borough. However, the proposed modifications to the policy would mean that the release of these Sustainable Urban Extensions (SUEs) is no longer controlled by a phasing mechanism and the modifications would also result in these sites being allocated for development rather than just identified as broad locations. These modifications mean that the SUEs would now be more likely to come forward earlier in the plan period. As a result, many of the impacts that would have occurred in the longer term under the version of the policy included in the Core Strategy Submission document would now occur earlier in the plan period under the revised policy.

The rapid release of Green Belt land can only be to the benefit of developers and will put back development of brown field sites. The council admitted at the hearing that early release of Green Belt will result in the delay of development of brown fields, and this too is highlighted by latest government thinking, see 4.10. The proposal to release Green Belt early is a poor decision not made in the best interests of local people. We will quickly see what a poor decision it was.

5.135 By continuing to support the identification of SUEs and safeguarded land for housing and employment development the amended policy would continue to ensure that there is sufficient land to meet the Borough's development requirements. It is therefore envisaged that the revised policy would still have a positive effect on the objectives relating to poverty and deprivation; housing; the growth potential of business sectors; and maintaining high and stable levels of employment. However, as noted above, these impacts are now predicted to occur earlier in the plan period. In addition, by potentially resulting in the SUEs coming forward earlier in the plan period, the modifications to the policy could result in the SUEs competing with the Council's regeneration objectives for urban areas. As a result, the modifications to the policy reduce the level of certainty that it would have a positive impact on the objective that relates to poverty and deprivation.

The proposal to release Green Belt early will impact on the council stated regeneration objectives. Little in the way of long term employment will come from vast housing estates, only a greater demand on roads, schools, GP's and a lowering of air & water quality with an increase in noise pollution.

5.136 In addition, as the amended policy would result in some housing and employment development taking place in areas on a series of predominantly greenfield sites that are presently within the Green Belt, it could have a negative effect on the objective relating to land and soil and an uncertain effect on the objectives relating to landscape character and accessibility; and Green Infrastructure. Key mitigation measures to address some of these impacts will include ensuring new

development is built to an appropriate density, retaining areas of woodland, securing the provision of on-site open space, and securing appropriate landscaping to moderate the impact of proposals on the local landscape character.

I have already called into dispute the density quoted by the council as the proposal in South Whiston and the Council average density of 30 dwellings per hectare is significantly above the information they have given the public and what they have consulted on. Consultation is 1503 against 2481 according to calculation using average density(4.10). Latest planning applications are far in excess of what the public were told, Recently Knowsley gave outline planning permission for 207 dwellings at Bank Lane, Kirkby (even though the site is still in the Green Belt). This is a difference of 76 dwellings, and represents a 58% increase on the capacity that Knowsley Council said the site had.

5.137 As some of the SUEs are used for informal recreation and others contain sports pitches, it is considered that the revised policy could also still have a long term negative impact on health. The proximity of some of the locations to designated heritage assets and the presence of archaeological assets within some of locations mean that the revised policy would also still have an uncertain impact on the objective relating to built heritage in the longer term. It is also considered that the policy still has the potential to have a negative impact on the objective relating to biodiversity. Undertaking ecological surveys, excluding areas of priority habitat from the developable area and the provision of on-site habitats are all likely to be key mitigation measures. However, as noted above, these impacts are now predicted to occur earlier in the plan period.

Uncertain impact on archaeological assets within the area will be compromised. We have not seen Ecological research to discredit the assertion that removing this area from Green Belt will not have a catastrophic effect. The modifications will bring the ecological disaster forward, so that we may see them before our Grandchildren do.

5.138 The revised policy still would have the potential to result in more dispersed patterns of development. In addition, the construction and operation of the development that would be delivered on the SUEs would inevitably result in carbon dioxide emissions. Consequently, and notwithstanding the fact that the Knowsley Local Plan Transport Feasibility Assessment (2012) identified that some of these locations have good accessibility to bus routes, cycle routes and services and facilities, it is considered that the revised policy would still have an uncertain effect on the objectives relating to mitigating climate change; protecting air quality; and minimising the need to travel.

This point is broadly supporting our ascertainment as to the detrimental impact on traffic within the area. Local People contest the accuracy of the Knowsley Local Plan Transport Feasibility Assessment (2012) as our research carried out by local people show more than 400 vehicles per 30 minute session at peak times and if deliveries took place to Tesco with Artic then the whole area became log jammed. Only one bus per

hour was spotted until 7pm when the service stopped. We would assert that the transport assessment is out of date and not relevant to the increase in traffic we have seen and would call for another assessment to be carried out.

CS14: Principal Regeneration Area – Prescott Town Centre

5.156 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process. The revised policy would still direct investment to Prescott town centre and would seek to intensify its retail function, encourage a wider mix of uses and create a distinctive identity and a complimentary evening economy. As such, the revised policy would still have the potential to have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town and local centres. The amended policy wording does however remove some of the restrictions placed on retail development in Cables Retail Park. In particular, it is no longer specified that retail development within Cables Retail Park should provide for convenience or bulky goods retailing and should maintain the current retail floorspace capacity of the Retail Park. These amendments could increase the scope for further investment in the Retail Park and result in a consequential reduction in investment in Prescott town centre, particularly as the Knowsley Local Plan Economic Viability Assessment (2012) indicates that comparison retail in Prescott town centre is generally unviable in current market conditions. This reduces the level of certainty that the revised policy would have a positive effect on the objective.

Prescot town centre is run down and irrelevant in retail terms, even the council have had to move offices to an ex pub at vast expense, just to fill another empty building. When the council allowed Tesco to build a massive supermarket at Cables Retails park it as good as sounded the death knell of Prescott town centre. (5.156) Broadly agrees with our assessment.

5.157 By reducing the level of certainty that the policy would support investment in Prescott town centre, these proposed amendments mean that there is also a lower level of certainty that the revised policy would have a major positive impact on the objective that relates to protecting and enhancing Knowsley's built heritage.

Not proved

5.159 There are no anticipated negative effects on the sustainability objectives. The proposed modifications would not however prevent the policy from having an uncertain impact on the objective relating to mitigating climate change

Not proved. Agrees with earlier points that state the policy with have a detrimental effect on climate change.

5.177 The revised policy also still encourages the re-use of vacant and underused historic assets and states that favourable consideration will be given to schemes that enhance the importance of the asset for the economy. The policy could thereby result in the creation of premises for new businesses. In addition, protecting and enhancing buildings and features of historic interest should help create more attractive places to invest in and could lead to enhancements to Prescot town centre. Consequently, the amended policy would also continue to have the potential to have a positive effect on the objectives relating to poverty and deprivation; increasing the number of new businesses; enhancing the vitality and viability of town and local centres; and maintaining high and stable levels of employment and reducing long-term unemployment.

Developers will not consider run down existing areas, whilst vast areas of Green Belt are available, which are considerably easier to develop.

CS21: Green spaces and Trees

5.179 The proposed modifications to the policy would have some impact on the performance of the policy against a number of sustainability objectives. In particular, although the revised policy still seeks to resist new development which would result in the loss of greenspace and would provide support for the provision of new areas of greenspace, the modifications to the policy mean that it would now encourage the retention of existing trees and woodlands and the appropriate planting of new trees rather than require this. This amendment to the policy wording is considered to reduce the level of certainty that existing trees would be retained and new planting secured. Consequently, whilst it is considered that other aspects of the policy would ensure that it continues to have a major positive impact on the objectives that relate to landscape character and green infrastructure; and a positive impact on the objectives that are concerned with adapting to climate change; mitigating climate change; water quality; and air quality; it is considered that this modification results in only moderate certainty that the policy would have a positive effect on these objectives.

Once Knowlsey has shown itself to be open to removing Green Belt from protection, future planning applications will use this behaviour to push for more releases. This is a slippery slope that Knowlsey council have embarked on which will create a borough which only has an ex tip and non-public green space.

5.181 The revised policy would still seek to resist the loss of greenspace and would provide support for the improvement of existing public open spaces and encourage the provision of new greenspaces. It could therefore help provide opportunities for participation in sport and recreation which would have a positive effect on the objectives relating to health; and poverty and social deprivation. It is however recognised that the provision of opportunities for sport and recreation does not necessarily guarantee engagement in these activities and, as a result,

there is only a low level of certainty about the effect on these objectives.

I would welcome the opportunity to see where Knowsley believe they can get new green spaces from? Also the council have overstated the positive impact on health, poverty and social deprivation that a vast estate of houses can have. It is more likely that this influx of residents could also increase anti-social behaviour.

CS22: Sustainable and Low Carbon Development

5.183 It is envisaged that the proposed modifications to the policy for Sustainable and Low Carbon Development would have a number of impacts on its performance in the sustainability appraisal process. The amended policy still requires development to incorporate a range of measures which would improve its sustainability. Nevertheless, the removal of the requirement for new development to achieve particular Code for Sustainable Homes/BREEAM standards and the removal of the requirement for development to incorporate decentralised and low carbon energy, means that there is a lower level of certainty that the policy would have a major positive effect on the objective that relates to mitigating climate change. Similarly, by not requiring new development to achieve particular Code for Sustainable Homes/BREEAM standards it is considered that the policy is less likely to result in new developments which incorporate water conservation measures or make use of recycled materials. As such, the proposed modifications mean that there is a lower level of certainty that the policy would have a positive impact on the objectives that relate to minimising the production of waste and increasing recycling rates; and ensuring the prudent use of water and mineral resources.

To remove the need for developers to meet Code for Sustainable Homes/BREEAM standards is another nail in the coffin of our councils green credentials. It is a bizarre decision at the start of the 21st century, particularly as we all face the prospect of climate change. The demand on energy, water and other resources is likely to be much higher.

5.184 In addition, the removal of the requirement to achieve certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.

Once again this point is totally at odds with other statements and shows that there would be a negative effect on the objectives that relates to poverty and deprivation; and health.

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



CHIEF EXECUTIVE *Knowsley Council*

12 NOV 2014

RECEIVED

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	IRÈNE RIMMER	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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- YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

IRENE R. MIER

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KGB 514

Paragraph Ref

E5

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The removal of land which is agricultural land is not meant to be built on.

To build 1500 houses on this type of land will not enhance the green infrastructure

Need more notice of what's going on.

Continue on a separate sheet if necessary...

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I object to these houses being built as it is bad enough trying to get out of my drive at school times, the congestion on the roads is awful, the pollution in the air will increase therefore chest complaints increase, resulting in G.P. appointments will be needed and my take longer to see your G.P.
Where are the jobs, there is not any jobs in this area as it is. There used to be houses etc, now there are none. The strain on the H₂O supply

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date 1-11-14.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MISS	
Name	JANET GORE	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Janet Gore

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I WISH TO OBJECT TO ALL PROPOSED PLANS + MODIFICATIONS REGARDING THE PLANS TO RELEASE THE GREEN BELT IN SOUTH WHISTON. I FEEL THE PLANS DO NOT COMPLY WITH GOVERNMENT GUIDELINES AND LEGISLATION.

GREEN BELT IS TO PROTECT URBAN SPRAWL AND THIS LAND IS THE LAST PIECE OF GREEN BELT IN SOUTH WHISTON ALTHOUGH THE WOODS + BIG LAKE WOULD BE RETAINED DEVELOPMENT OF THE SURROUNDING LAND WOULD IMPACT GREATLY ON THE WILDLIFE SUPPORTED BY THIS AREA.

THE PROPOSED DEVELOPMENT CONTRADICTS THE PURPOSE OF GREEN BELT TO RETAIN ATTRACTIVE LANDSCAPES NEARBY WHERE PEOPLE LIVE.

DEVELOPMENT OF THIS LAND WILL ALSO AFFECT THE LOCAL BEE POPULATION TO EXIST AS A RACE WE NEED BEES.

THERE IS NOT ENOUGH EMPLOYMENT WITHIN KNOWSLEY TO SUPPORT A LARGER POPULATION

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I DO NOT FEEL THE PLANS CAN BE CHANGED TO SUPPORT MORE HOUSING WITHIN THE WHISTON AREA. THE PRESENT ROAD STRUCTURE WHICH INCLUDES WINNY ARBOR ROAD, LICKERS LANE, FOX'S BANK & TALBOCK TRAFFIC ISLAND CANNOT COPE WITH THE FLOW OF TRAFFIC DURING CERTAIN TIMES OF THE DAY PRESENTLY, EVEN WITH PROPOSED MODIFICATIONS I DO NOT FEEL THESE WOULD IMPROVE THE SYSTEM. EVEN IF MORE EMPLOYMENT IS BROUGHT INTO THE AREA BY BUILDING ON EXISTING BROWN BELT YOU CAN NOT GUARENTEE THAT NEW & EXISTING RESIDENTS WOULD FILL THESE POSIS. THERE ARE NOT ENOUGH SCHOOL PLACES, NURSET PLACES, DOCTORS, DENTISTS TO SUPPORT THIS AMOUNT OF EXTRA POPULATION. ALL ENTRY POINTS TO THE LAND SURROUNDING THE WOODS + BIG LAKE WOULD CREATE CONGESTION AND JAMMER POINTS FOR TRAFFIC AND PEDESTRIANS. Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	
Name	JANET ROURKE	
Job Title (if appropriate)	—	
Organisation (if appropriate)	—	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

JANET ROURKE

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Councils philosophy about new housing contributing to economic development and population retention is fundamentally flawed. See first paragraph in Document KQBS 14, SA Objective ECI (above) outlining 'None of the options for Land to the South of Whiston include an employment element'

May encourage further investment in the area sustaining local employment and also potentially bringing new jobs into the area is not a 'sound' reason for economic development, competitiveness and productivity of business as stated Document KQBS 14 SA Objective ECI.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Carry out an up to date housing requirement survey taking into account the latest figures from the office of National Statistics.
Carry out a relevant Traffic Management Survey taking into account the existing roads at peak times and the additional roads placed upon the area with an influx of at least 2200 vehicles.
Insist that empty properties and brown field sites are developed before considering GREEN BELT release.
Put back any Green Belt release until end of plan period and even then consider all other areas, green belt release should be the last resort, not the first action. Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date

1st Nov. 2014



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Dr	
Name	Jennifer Mullin	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation Jennifer Mullin

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref KGBS 14 Paragraph Ref E1

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I do not think that the proposed plan is sound for the following reasons:

- It is the last remaining proper green space in the Whiston area.
- The infrastructure around the area cannot cope with so many new houses. For example GP surgeries, NHS drop in centres, Schools, the local hospital, child care facilities etc.
- The proposed development will lead to a great increase in pollution due to increased traffic. The industrial development of the former colliery site will also lead to increased levels of pollution
- The development will put extra strain on the already busy roads. Tarbock roundabout is already extremely busy. This will lead to gridlock.
- There are already not enough jobs to support the local community. More residents will lead to increased competition for existing jobs. This will result in higher levels of unemployment and lead resentment from existing residents.
- The site is an important habitat for lots of wildlife, including some rare species. The development would be extremely detrimental to the wildlife.
- Natural green space is important to resident's health and wellbeing. It is especially vital in Knowsley as there are two major motorways in very close proximity. The greenbelt land provides an important divide between these noisy, pollution filled motorways and resident's homes.
- Brownfield sites already exist in Knowsley which would be better suited to development. These brownfield sites should be developed before greenbelt sites are even considered for development.
- There are no exceptional circumstances to justify the destruction of the long established Green Belt land in Whiston.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

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Signature



Date 11/11/2014



Knowsley Council

Knowsley Plan: Strategy

Local
Core

Knowsley Council

Proposed Modifications - Consultation Representations Form

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Julie Anne Parker	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation J A Parker

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref M088 Policy Ref KGBS 17 Paragraph Ref 5.46A

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
a) Legally Compliant? (see guidance note 2.2)		
b) Sound? (see guidance note 2.3)		✓

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

SA

In the Infrastructure and development options study completed by Mott MacDonald 8/7/2014 relative to “ South Whiston and land south of the M62” .
The assessment is not sound as information is not factual.

Table 5.3 SWOT Analysis

Kings Business Park is almost full and Knowsley requires a successor B1 office Park'.....
There are 10 vacant units. This statement is not sound as there are a number of empty office units currently available on Kings Business Park and the landowners Commercial Property Developments have an option to increase the development of the business park for b1 use to the north of the site. I have attached an ariel view of the business park which demonstrates that the business park has potential to double in size – there are a number of planning documents available that support this application.

5.46A In the context of employment land, Green Belt release is required specifically to address Knowsley's overall development requirements up to 2028 and beyond. The immediate release of Sustainable Urban Extensions is necessary to provide an improved range, choice and quality of sites to address specific employment needs. These include provision for a high quality business park (as a successor to Kings Business Park, which is almost fully developed) and large scale distribution and

Logistics centre.

Mr Pike, can you take into consideration the 'level of need' for further business parks when there are a number of empty units for multiple uses available on Huyton Business Park, Whiston Business Park on Fallows Way and Kings Business Park in Prescot all within a 3 mile radius of the proposed SUE of Whiston south greenbelt.

Please also note the historically low attainment figures and aspiration of school leavers and Knowsley Councils ability to deliver the Local Plan based on the consistent failings of Local Authority services in Knowsley,

Notably;

ONS area of Indices of Multiple Deprivation

Knowsley has returned £18 million of much needed and unspent funding

Childrens services in special measures

Low attainment levels in Knowsley schools

The failure to deliver North Huyton Communities Future redevelopment programme effectively – there is little visible regeneration in this area, despite the first phase of a housing development being completed. The Centre for Learning school in this area closed within 2 years due to under subscription, the community centre is considerably under used and there is little synergy between the newly built community of 250 families and the existing community which has directly impacted upon crime and increased void properties in this area.

I also stress that I first received correspondence relative to the local plan in September 2014 and feel that I have been excluded from consultation, I feel that there is not a robust evidence base to justify the early release of greenbelt and ask you to extend the period of consultation.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

In the Local Plan M0157 Para 6.45 should delete the words “, and SUE 2c “Sustainable Urban Extensions - South Whiston and Land to the South of the M62”) and necessarily the links and other references consequent throughout .

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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) Yes, I wish to participate at any further public hearing

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Signature



Date 14/11/2014



TOWN AND COUNTRY PLANNING ACT 1990

SITE ADDRESS: 16-21 Lion Court, Kings Drive, Kings Business Park, Prescott, Knowsley, L34 1BN

DESCRIPTION OF DEVELOPMENT: APPLICATION TO VARY CONDITION NO'S. 8 & 9 ATTACHED TO PLANNING PERMISSION 07/00746/FUL (ERECTION OF 8 NO. TWO STOREY OFFICES WITH ASSOCIATED CAR PARKING AND LANDSCAPING) TO ALLOW FOR DETAILS RELATING TO THE EMERGENCY ACCESS FACILITY & PEDESTRIAN ACCESS TO HUYTON LANE TO BE SUBMITTED PRIOR TO THE COMPLETION OF UNITS 17-21 AND NOT ON COMMENCED TO DEVELOPMENT (UNIT 16 CONSTRUCTED ONLY, 17-21 NOT COMMENCED TO DATE).

APPLICATION REFERENCE: 13/00283/FUL

APPELLANT'S NAME: Commercial Development Projects Ltd

APPEAL REFERENCE: A 13/00283/FUL/01/2013

APPEAL START DATE: 31 July 2013

A damning report into children's services in [Knowsley](#) said "widespread failures" were putting vulnerable children at risk.

Education watchdog Ofsted today branded Knowsley Council "inadequate" following an inspection of its services for children in need of help and protection, looked after children and those leaving care.

A review of the effectiveness of Knowsley's Safeguarding Children Board also concluded its performance was inadequate.

Inspectors said the council had a high turnover of social workers in assessment and safeguarding teams - and inexperienced staff were carrying out visits to children.

Ofsted's report said there were "significant weaknesses" in management, with a history of "infrequent and poor supervision" of social work staff. It said there had been improvements, but quality remained low.

Inspectors found record keeping was variable and often poor across social work teams. They said it was taking too long for children in care to be placed for adoption when it was in their best interest.

The report said: "Widespread failures and inconsistent practice across help and protection services leave some children and young people at risk of suffering harm.

"Too many children and young people who need help and support or who need to be cared for by the local authority experience drift and delay.

"Some have been left for too long in situations where they have suffered harm."

The report, published today, follows an inspection carried out at the end of April and beginning of May.

The report said senior council officers were aware of "significant deficits" in its services for children and families and an improvement plan had been drawn up - but it was too early to see any significant impact.

It read: "The local authority is aware of these weaknesses, and has developed an improvement plan.

"Recently appointed senior managers know what they need to do to improve the quality of practice and services for children and young people in Knowsley.

"However, remedial action is still at an early stage and significant impact is not yet evident in day to day practice."

New Deal for Communities

NHCF is the successor organisation to a central government funded programme known as New Deal for Communities (NDC).

This programme ran in Knowsley from 2001-2011 when the North Huyton area was awarded £55.8m to regenerate the area through a partnership board of local residents, ward councillors and agency representatives.

The funding was spread across 7 main themes in North Huyton: Health, Education, Crime, Employment, Housing, Youth and Community.

Over the 10 years, some 200 plus projects were commissioned by the independent Board to improve the performance of the area in comparison to the rest of the borough and elsewhere. This was achieved using a variety of in house and external delivery agents.

The North Huyton programme was rated as one of the leading NDC programmes in the country achieving 'excellent' status through the government's performance management framework.

Besides a comprehensive revenue based change programme, the Board also contributed to a number of key new build capital projects in the area including:

- 2 new Learning Centres
- Primary Care Trust Resource Centre
- Training and Skills Centre
- Youth Centre
- Community Centre



Councillor's anger as £18m of unspent funding businesses handed back to the Government

Oct 05, 2014 08:00

By [REDACTED]

Liverpool council cabinet member for skills [REDACTED] said the situation wasn't good enough



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Email



[REDACTED] in front of the Forever 21 store and the Lobster Pot fish and chip shop on Whitechapel, Liverpool city centre. Picture [REDACTED]

UP TO £18m of funding meant to help local firms and workers was given back to the government by a Merseyside council after it went unspent.

The cash, which was to be spent across the region, was being handled by Knowsley

Recommen

Improv

Improvement Notice

To: NAME Knowsley Metropolitan Borough Council ("the Council")
ADDRESS Archway Road, Knowsley L36 9YU

This Improvement Notice is issued to Knowsley Metropolitan Borough Council on 16 September 2014 following the findings of inadequate performance and arrangements for 'children who need help and protection', for 'adoption performance' 'leadership, management and governance', and for 'effectiveness of the Local Safeguarding Children Board' as identified in the Ofsted inspection report published 30 June 2014.

1. This Notice is given to address all the areas for improvement identified in the report of the inspection of services for children in need of help and protection, children looked after and care leavers and review of the effectiveness of the local safeguarding children board published by Ofsted on 30 June 2014.
2. To comply with this Notice, the following actions are required of the Council, working with its partner agencies ("partners") as identified by the Children Act 2004 (section 11), with clear evidence of improvement:

Understanding needs of children, young people and families

3. **Ensure that the needs of children and young people in Knowsley are reviewed and there is a clear statement of what children and young people can expect from services provided by social care and partners** by:
 - a. reviewing the Joint Strategic Needs Analysis and communicating a shared understanding of strategic priorities to staff and partners; with a clear focus on vulnerable groups who would benefit from help and protection, care and adoption.
 - b. setting out a process map of the children and family journey through the system including key transition points and target performance indicators;
 - c. ensuring the views of children and young people, their experiences and needs are gathered to inform individual care plans, the commissioning of services, improvements to services and that there is a system to record and report to the Local Safeguarding Children Board, the Improvement Board and children and families;
 - d. ensuring that children and young people are seen alone during statutory visits and their views recorded;

- e. ensuring social worker's report on child protection are shared with the family 24hrs before conferences; and
- f. ensuring that children and young people are provided with information about entitlements and how to complain.

Leadership, Management and Governance

- 4. **Ensure the Council sets out a statement of their vision and ambition** for children's services and an improvement plan ('the Improvement Plan') which sets clear objectives, timescales, outcomes and is supported by a data set including qualitative and quantitative information against performance indicators by 6 October 2014. Consideration should be given to, but not limited by, the *Children's Safeguarding Performance Information Framework 2012*. The statement and Improvement Plan should be communicated to and implemented by all staff including those in partner agencies. The Improvement Board ('the Board') is accountable for delivering the Improvement Plan.
- 5. **Ensure leadership, scrutiny and challenge is exercised** and impacts on the quality and effectiveness of safeguarding and looked after children services. By ensuring that:
 - a. effective assurance arrangements are in place within the Council and across the partnership in line with Department for Education (DfE) statutory guidance '*Roles and responsibilities of the Director of Children's Services and the Lead Member for Children Services*' and '*Working Together to Safeguard Children*';
 - b. elected members of the Council understand and deliver their corporate parent role for looked after children and meet all the statutory requirements, including statutory visits;
 - c. the lead member is supported by an experienced peer with a successful track record of providing political leadership in a Council that has gone through significant improvement following an inspection;
 - d. Council senior managers continue to consult staff and partners on the changes necessary to secure improved children services and that there is sufficient capacity to enable senior managers to implement the improvement activity and measure impact;
 - e. a culture of accountability is developed with managers, staff and partners holding each other to account with action taken when required to challenge poor and unacceptable performance; and
 - f. children's social care is represented on all key planning forums such as the Health and Wellbeing Board.

Early Help and Partnership Working

- 6. **Implement a prevention and early intervention strategy to provide children, young people and families appropriate support from early help to statutory intervention** by:
 - a. setting clear expectations that partners in health and the police play

- a full and active role in the identification and support of those who need early help and protection;
- b. developing and agreeing a local protocol for early assessment as set out in *Working Together to Safeguard Children* so all partners are able to respond to early needs and involve others as required;
- c. reviewing and monitoring the understanding, use of thresholds and criteria, and referral routes (including the take-up of CAF) by different partners;
- d. monitoring referral/re-referral rates and feedback from referrers;
- e. commissioning targeted services with partners with mechanisms for step-up/step-down between early help and statutory social care to ensure appropriate support and shared case leads across partners; and
- f. monitoring the contributions to, the use and impact of early help as made by all partners and to regularly report to the Board on this with recommendations to improve practice.

Quality and effectiveness of Practice

7. Improve the quality, timeliness and consistency of children's social care assessments by ensuring that:

- a. all assessments by the Council and partners follow the principles and parameters of a good assessment and are completed within timescales as stated in *Working Together to Safeguard Children*;
- b. all protocols are agreed and monitored and ensure information is shared in a timely fashion e.g. after key planning meetings where decisions are taken; and
- c. evidence, rationale and decision making for assessments are timely in being recorded.

8. Improve the quality, delivery and management of child protection practice and plans by ensuring that:

- a. all partners attend child protection meetings and strategy meetings and this is escalated and addressed when not occurring;
- b. child protection plans comply with the requirements of *Working Together to Safeguard Children* including ensuring that all plans include the views of the child, time bound actions, with assigned 'owners', and with measurable, success outcomes for children and young people;
- c. plans include review and evaluation points, with timescales agreed with other professionals along with information about their contributions;
- d. scrutiny, challenge and capability of Child Protection Conference Chairs is improved by having regard to statutory guidance;
- e. case records are regularly updated, in a timely fashion, to document any new or amended information, rationale and decisions as they arise; and
- f. evidence of management oversight, decision making and

appropriate action and chronologies, is set out in detail on each case file.

9. Ensure robust permanency, care planning and review of looked after children at the earliest point by :

- a. improving matching processes to ensure that the needs of children requiring long term placements are met;
- b. implementing a care planning tracker that is subject to regular review;
- c. clear systems are in place to ensure concurrent and parallel planning for children entering care;
- d. reviewing the procedures of the Independent Reviewing Officers to adhere to statutory guidance and to tackle any delays to the timescales set out in plans;
- e. ensuring there are sufficient foster carers and residential placements to respond to the needs of looked after children; and
- f. monitoring the educational achievement of looked after children against clear targets.

10. Improve the timeliness of adoptions by ensuring that:

- a. clear plans are in place to improve all aspects of adoption timeliness (local authority decision-making, placement orders, matching and placement);
- b. measures are taken to build on the introduction of recent new processes to address delays including the production of robust performance management information; and
- c. performance management information and a trajectory of likely impact on DfE's adoption scorecard indicators is reported and reviewed by the Board as part of the data set in paragraph 4.

Quality assurance, audit and management oversight

11. Ensure there is a robust and effective quality assurance framework to drive and evidence the impact of improvement with families, front line practitioners and key partner agencies that:

- a. uses quantitative and qualitative evidence, with a view to the effectiveness of practice and the degree to which it is safe;
- b. includes regular auditing arrangements of case files, with use of independent arrangements to review the quality and timeliness of recording and compliance in individual case records (as set out in *Working Together to Safeguard Children*);
- c. there is an agreed regular and planned approach (including the size and scope of audits), to update the Board on audit findings and analysis, along with recommendations to improve practice, which should also inform the work of the LSCB; and
- d. ensures recommendations and actions are measurable, inform improvements in practice, workforce development and supervision.

12. Establish effective supervision and management oversight by

ensuring that:

- a. all staff continue to have regular supervision;
- b. that supervision is reflective to promote learning, in line with agreed protocols, with training available for supervisors;
- c. social worker responsibilities and workloads are defined and reviewed with a range of work for staff consistent with their level of experience and competence (including protected caseloads for Newly Qualified Social Workers); and
- d. all management oversight (such as case discussion, supervision and audit) is conducted in line with standards set out in *Working Together to Safeguard Children* to ensure safe practice and decision making on individual child protection cases.

Staff capability and capacity

13. Develop a **workforce strategy** which is based upon an analysis of need. The workforce strategy must include clear recruitment and retention strategies, set out how poor performance and capability issues will be dealt with and an analysis of skills and training needs required to deliver good social work. It should be implicitly linked to the Improvement Plan, and clearly related to service plans and audit outcomes. The strategy should be aimed initially at reducing the dependency on agency staff and should include:

- a. support for newly qualified social workers is reviewed to ensure that it meets need and results in them becoming advocates for the service in Knowsley;
- b. a review of, and improvement to, tools and systems required to deliver good and agile social work including the electronic information system; and
- c. staff engagement and regular feedback to improve and shape practice using feedback mechanisms, such as staff surveys and report the results to the Improvement Board.

Local Safeguarding Children's Board (LSCB)

14. **Strengthen the LSCB so it can ensure that partners work together effectively and are held to account for their responsibilities** by ensuring that:

- a. there is action to improve the effectiveness of the LSCB, to ensure its compliance with the requirements of *Working Together to Safeguard Children* and that partners are fulfilling their obligations under section 11 of the Children Act 2004;
- b. multi-agency practice and individual partner audits are robust, with reporting to the Improvement Board on any key lessons and recommendations to improve practice;
- c. all partners are committed a shared set of priorities for safeguarding, child protection, and early help/intervention and

- prevention;
- d. all policies and training are reviewed and delivered to ensure understanding of thresholds in all agencies;
 - e. the LSCB learns from national lessons of serious case reviews and from LSCBs where effectiveness is considered good or outstanding; and
 - f. the chair of the LSCB reports progress to the Improvement Board meeting to inform the Improvement Board Chair's report to the Minister.

15. Taking account of the measures set out in this Improvement Notice the Council is expected to:

- a. Establish an Improvement Board ('the Board') and appoint an Independent Chair ("the Chair"). The Board is expected to meet at least every 6 weeks. If in the future the Improvement Board wishes to vary the frequency of meetings this must first be agreed by the Department for Education. An official from the Department for Education will attend board meetings as a 'participant observer'. The Board should include key partner agencies in its membership. The Council must provide the Chair with administrative support to a level sufficient for the Chair to undertake his/her role efficiently and for the Board to operate effectively. This to include provision to allow, at least 2 days every month for independent testing and validation.(either by the Chair directly or an independently appointed person on behalf of the Chair).
- b. The Council must develop an Improvement Plan by 6 October 2014 aimed at delivering improvements. The content of the Improvement Plan and a record of progress must be kept up to date. The Council must report to the Board on progress against the objectives in the plan and can commission updates from partners in order to do this. Reporting should include analysis and recommendations supported by reviewing performance trends against key data sets (which partners should agree) including quality of service and outcomes for children and young people. The Council should highlight those objectives which are slow to progress and highlight where contributions need to be strengthened.

16. The Council should aim for actions included in the Improvement Plan to be delivered within 18 months of the Ofsted inspection. The objectives and performance trends will form part of the discussion at formal review meetings with the Department for Education.

Improvement against the above measures will be assessed as follows:

- 17. The Improvement Board Chair must provide to the Parliamentary Under Secretary of State for Children and Families a written progress report against the areas set out in this Notice by December 2014 and every three improvement boards thereafter. The Chair's report should be based on

independent testing and validation of improvements.

18. In parallel, the LSCB Chair should also report to the Improvement Board meeting on progress to improve its effectiveness.
19. Progress reviews will be conducted by DfE officials and take place every six months until this notice is lifted, or at the specific request of the Department. Prior to the review, any Improvement Board Chair's report for that period will be supplemented by a Council report of progress against the improvement plan submitted to DfE a week in advance of the review. Such reviews may result in an amendment to this Improvement Notice and further action being required.

Failure to comply with this Improvement Notice by the assessment dates or poor progress:

20. Should the Council be unwilling or unable to comply with this Improvement Notice, or should ministers not be satisfied with the Council's progress at any stage, ministers may choose to invoke their statutory powers of intervention (s497A Education Act 1996) to direct the Council to enter into an appropriate arrangement to secure the improvements required in children's services.

Signed on behalf of the Secretary of State



.....

Dated : 16 September 2014

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North Huyton Action Area Supplementary Planning Document

Knowsley Metropolitan Borough Council

February 2007

(Copy of Document PP05 provided)



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE **Knowsley Council**

12 NOV 2014

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	miss	
Name	Katy Andrews	
Job Title (if appropriate)	Banking customer relations manager	
Organisation (if appropriate)	Barclays	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation Katy Andrews

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref KGBS14 Paragraph Ref EC3

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

There is no evidence this development will bring employment to the area that is why I feel this proposed modification is not sound.

There's nothing to say local firms will be used for the construction, either

creating any further shopping outlets will also damage the local business causing further unemployment.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Allow brown belt land to be developed before considering the sale of Greenbelt.
Take into consideration the information given by Eric pickles about Greenbelt land.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature 

Date 11/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	KESLEY O'HARA	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation hesley O'Hara

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref K9BS 14 Policy Ref Ec1 Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I WISH TO OBJECT TO ALL PROPOSED PLANS & MODIFICATIONS REGARDING THE PLANS TO REVERSE THE GREEN BELT IN SOUTH WHISTON. I FEEL THE PLANS DO NOT COMPLY WITH GOVERNMENT GUIDELINES AND REGISTRATION.

GREEN BELT IS TO PROTECT URBAN SPRAWL AND THIS WARD IS THE LAST PIECE OF GREEN BELT IN SOUTH WHISTON. ALTHOUGH THE WOODS & BIG WAKE WOULD BE RETAINED DEVELOPMENT OF THE SURROUNDING WARD WOULD IMPACT GREATLY ON THE WIND LIFE SUPPORTED BY THIS AREA.

THE PROPOSED DEVELOPMENT CONTRADICTS THE PURPOSE OF GREEN BELT TO RETAIN ATTRACTIVE LANDSCAPES NEAR TO WHERE PEOPLE LIVE. DEVELOPMENT OF THIS WARD WILL ALSO AFFECT THE LOCAL BEE POPULATION. IT IS ACCEPTED GLOBALLY THAT TO EXIST AS A RACE WE NEED BEES, AND MUST PROTECT AND ENHANCE THE LOCAL CHARACTER AND ACCESSIBILITY OF THE LANDSCAPE AND COUNTRYSIDE ACROSS KNOWSLEY.

Continue on a separate sheet if necessary...

THERE IS ALSO NOT ENOUGH EMPLOYMENT WITHIN KNOWSLEY TO SUPPORT A LARGER POPULATION

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I DO NOT FEEL THE PLANS CAN BE CHANGED TO SUPPORT MORE HOUSING WITHIN THE WHISTON AREA.
THE PRESENT ROAD STRUCTURE WHICH INCLUDES WINDY ARBOR ROAD, KICKERS HANE, FOX'S BANK & TABACK TRAFFIC ISLAND CAN NOT COPE WITH THE FLOW OF TRAFFIC DURING CERTAIN TIMES OF THE DAY. PRESENTLY, EVEN WITH THE PROPOSED MODIFICATIONS I DO NOT FEEL THESE WOULD IMPROVE THE SYSTEM EVEN IF MORE EMPLOYMENT IS BROUGHT INTO THE AREA BY BUILDING ON EXISTING BROWN BELT YOU CAN NOT GUARENTEE THAT NEW & EXISTING RESIDENTS WOULD FILL THESE POSTS.
THERE ARE NOT ENOUGH SCHOOL PLACES, NURSERY PLACES, DOCTORS, DENTISTS ETC TO SUPPORT THIS AMOUNT OF EXTRA POPULATION.
LOOKING AT THE PROPOSED PLANS NEW ENTRY POINTS TO THE LAND SURROUNDING THE WOODS AND BIG WAKE WOULD CREATE CONGESTION AND CREATE DANGER POINTS FOR TRAFFIC AND PEDESTRIAN.
Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
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Signature



Date

1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

CHIEF EXECUTIVE

Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	
Name	WORTLEY	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	SAVE WHISTON GREEN BELT	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation SAVE WHISTON GREEN BELT

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref KGBS14 Paragraph Ref EC1

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

THE COUNCIL'S PHILOSOPHY ABOUT NEW HOUSING CONTRIBUTING TO ECONOMIC DEVELOPMENT AND POPULATION RETENT IS FUNDAMENTALLY FLAWED. SEE FIRST PARAGRAPH IN DOCUMENT KGBILLSA OBJECTIVE EC1 (A) OUTLINING NONE OF OPTIONS FOR LAND TO SOUTH OF WHISTON INCLUDE AN EMPLOYMENT ELEMENT. MAY ENCOURAGE FURTHER INVESTMENT IN THE AREA. SUSTAINING EXISTING LOCAL EMPLOYMENT AND ALSO POTENTIALLY BRINGING NEW JOBS INTO THE AREA IS NOT A SOUND REASON FOR ECONOMIC DEVELOPMENT. COMPETITIVENESS AND PRODUCTIVITY AND BUSINESS AS STATED DOCUMENT KGBILL SA OBJECTIVE EC1

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

ERIC PICKLES . RECENTLY HAS MADE RECOMMENDATIONS TO PLANNERS
REGARDING PROTECTING GREEN BELT
PLEASE LISTEN TO PEOPLE VIEWS

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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a) No, I do not want to participate at any further public hearing

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Signature



Date

1/11/2014

From: [REDACTED]
Sent: 02 October 2014 22:18
To: [REDACTED]
Subject: FW: Ms Rachel Freeman, [REDACTED]
Importance: High
Follow Up Flag: Follow up
Flag Status: Completed

From: Rachel Freeman [REDACTED]
Sent: 01 October 2014 16:36
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Green Space
Importance: High

Hello [REDACTED]

Yes, I am emailing with regards to KMBC's Local Plan. Can you please take this to the Council please?

I am literally sickened to receive the letter from KMBC Policy Manager, Jonathan Clarke regarding the release of the Knowsley Lane green belt land. Apparently there is a need for houses and offices so I've been told. How can this be the case when there has already been development on the Hillside Estate accessible from Knowsley Lane? Aren't there empty houses there waiting to be filled.....and space for further development? Yes, I believe there is which I saw with my own eyes when I took a walk there a couple of weeks ago.

What are the plans for the patch of land on the corner of Primrose Drive and Knowsley Lane, where Knowsley Training Centre used to occupy? I suppose more houses hey? Why is there a need for office space, when you have King's Business Park again not occupied to full capacity?

Where is the evidence that supports the need for this development? Show me the research and proof that states hundreds of people want to move to this area and therefore require this development to go ahead.....Show me the evidence that supports the need for more office space. For some reason, I don't truly believe that this is a need....more like a want. More like a stab in the dark to see if it works and hundreds of people flock to Knowsley! What a gamble if there is not sufficient evidence, and who accepts responsibility if it all goes pear shaped?!!!!

What if this beautiful piece of land/natural habitat is removed forever by this development and the houses and offices do not get occupied? What then? I have been informed that 450 houses are to be built, whether that means purely on Knowsley Lane Green Belt or between the 10 areas, I don't know. What I do know is this.....once that land becomes a housing estate / industrial park and based on an average of two cars per household, the congestion and pollution will be diabolical for all residents directly on/off Knowsley Lane, Prescot, Knowsley Village, Huyton. Even accessing / exiting the M57 could be a nightmare.....DOES ANYONE TRULY CARE ABOUT US LITTLE PEOPLE..... MONEY TALKS HEY?!

Don't the people responsible for this development realise that Knowsley lane is already very busy as it is with the amount of traffic that goes through in either direction, and their bright idea is to bring more houses, cars..... POLLUTION AND CONGESTION!!!!

For the people who are making this decision, does it affect YOU or where YOU live? Is YOUR home life going to be turned upside down? How long will this development take to completion? How would YOU like it, or even cope with it if this was going to happen opposite YOUR home, where you loved living as a direct result of living opposite a very calming healthy piece of land where nature occupies.

Before this development reaches completion you expect us to literally be overlooking a building site, with cranes, diggers, and a whole host of very noisy, large vehicles. Dirt blowing over into our homes/gardens / vermin etc.

Don't you think that this will directly impact on residents' health and wellbeing like mine and my neighbours for example? AGAIN, DO YOU CARE?

My understanding of any large organisation is that they have a corporate social responsibility to uphold SUSTAINABILITY as it's in the public interest to do so. Isn't environmental protection one of KMBC's responsibilities??? Yet this organisation will be responsible for removing this land from the green belt and destroying it. Is this not a huge contradiction?

I bought my house 3 years ago in 2011. The land search showed no development plans and yet a few months previous to moving in, a petition to save this land had been in action. Regarding this new development, this is the first letter I have received. Why have I not been informed sooner about this?? Going back to 2011, had I known about the development or should I say destruction of this natural habitat, I would have reconsidered buying my home directly opposite this green belt! I believed for a long time that Knowsley Council did care about its residents.....and now, I feel totally cheated!!

I'm sure it comes as no surprise that I am one of many, many residents OPPOSED to this development. We are joining forces and will try to save this unique and much loved/appreciated area of North Huyton.

Rachel

Knowsley Lane resident



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Ray Davis	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt Action Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CS1 to 5, AD51 and the SUE documents are out of step with Public opinion, I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill. I consider the council have not utilised empty properties and brown field sites in its calculations of housing needs. The council have not considered infrastructure improvements to cope with the influx of people.

Paras:

3.2to3.24, 3.26,4.10,5.44to5.51,5.82to5.86,5.133to5.138,5.156,5.157,5.159,5.177,5.179,5.181,5.183,5.184

See attached sheets

If you are **objecting** to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Carry out an up to date housing requirement survey taking into account the latest figures from the Office of National Statistics, 2014.

Carry out a relevant up to date Traffic Management survey, taking into account the existing loads at peak times and the additional loads placed upon the area with an influx of at least 3000 additional vehicles.

Consider the impact on local services such as Doctor, Dentist, Schools, etc.

Insist that empty properties and brown field sites are developed before considering Green Belt release, and used to satisfy the 5 year plan. Brown field sites may well have the infrastructure already in place to cope with additional housing.

Put back any Green Belt release until end of plan period, and even then consider all other areas, green belt release should be the last resort, not the first action

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



ate 03/11/2014

KNOWSLEY LOCAL PLAN: CORE STRATEGY

Submission and Objections regarding proposed modifications

Ray Davis
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

Implications for South Whiston and Prescot Town Centre – Please see my comments highlighted in red.

3.20 The appraisal concluded that the Spatial Strategy for Knowsley is likely to have a largely positive impact on the sustainability objectives. In particular, it is envisaged that the Development Principles (CS2) are likely to have a major positive impact in the long-term on the objectives relating to health; mitigating climate change; and reducing the need to travel. It was concluded that the policies for Housing Supply (CS3), the Economy and Employment (CS4) and Town Centres and Retail (CS6) would have a positive impact on a range of objectives, particularly those that relate to social and economic issues and the appraisal also predicted that the policy for Green Infrastructure (CS8) would have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; adapting to climate change; and green infrastructure.

I would question how removing green belt can have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; and adapting to climate change.

3.21 The appraisal of the Proposed Submission document did however consider that a number of the policies would have an uncertain or negative impact on some of the objectives. For instance, it concluded that a number of the policies, such as the Spatial Strategy (CS1) and Green Belt (CS5) could have an uncertain impact on a number of environmental objectives in the longer term due to the potential for it to result in the release of a number of sites in the Green Belt.

How can this statement hold true to statement at 3.20 one is negative and one positive?

3.23 Nevertheless, the appraisal of the Proposed Submission document acknowledged that as each of the policies would result in built development and would therefore lead to some carbon emissions associated with the construction and operation of this development, their impact on the objective relating to mitigating climate change is uncertain. It also considered that there is some uncertainty over the impact of the policy for Knowsley Industrial and Business Parks (CS11) on the objectives relating to air quality and need to travel, particularly as there is limited information available on the amount and nature of the new employment uses that would be delivered. In addition, due to

both policies resulting in the provision of B1 office development in an out of centre location, the impact of the policies for Knowsley Industrial and Business Parks (CS11) and South Prescott (CS13) on the objective relating to the vitality and viability of Knowsley's town centres was also deemed to be uncertain.

The actions contained within the Local plan are identified here as uncertain and would certainly fail in meeting our green credentials as the development of green belt out of centre would increase the carbon impact.

3.24 On the whole, the appraisal of the Proposed Submission document concluded that the Thematic Policies performed well in the SA process. In particular, the policies relating to housing and the accommodation needs of the community (CS 15 – CS18) were considered to all have a positive impact on the objectives relating to poverty and deprivation; health and the provision of good quality housing; the policies relating to Sustainable and Low Carbon development (CS22) and Renewable and Low Carbon Infrastructure (CS23) were considered to have a major positive impact on the objective relating to mitigating climate change; and the policy for Greenspaces and Trees (CS21) was considered to have a major positive impact on the objectives relating to landscapes; biodiversity; adapting to climate change; and green infrastructure.

How can this point be made as positive when the document already highlights the possibility of a negative impact on all of the CS range of reports?

Proposed Modifications to the Submission Local Plan

3.26 The initial Local Plan Examination hearing sessions took place in November 2013. Following these hearing sessions, the Inspector appointed to undertake the examination issued his interim findings in January 2014. In response to these findings, and also to reflect other required amendments, the Council proposed a number of modifications to the Plan. These modifications included a revised approach to the release of Sustainable Urban Extensions, a reduction in the employment land target for the plan period, a reduced target level of affordable housing provision on sites in the urban area and the prioritisation of different forms of developer contributions in instances where viability is insufficient to fund all the non-mandatory requirements set out in the Plan.

The reduced level of affordable housing can only be in the favour of developers, government guidelines call for a level of 25%. A reduced level of employment land means that the target of job creation must be flawed.

4.10 The scale of any impact on an objective has been predicted taking into account the size of the site and the quantum of development it is likely to accommodate. In relation to housing sites, where an approximate number of dwellings that could be accommodated on a site have not been provided by the promoter of the site, its yield has been estimated based on the standard multipliers used for assessing the capacity of sites within the Strategic Housing Land Availability Assessment

(SHLAA) and the Green Belt Study. For sites in excess of 2 hectares in site size, this assumed a 75% net developable area and a density of 30 dwellings per hectare¹³.

In the case of South Whiston, 75% of the proposed area of 110.3 hectares minus 27.6 = 82.70 hectares @ 30 dwelling per hectare is 2481 dwellings. The council have only declared 1503 dwellings. This calls all of the council's estimates of housing into question. The proposal to bring forward Green Belt release on such a scale will also produce many more houses than the SHLAA calls for. Also the government has in October 2014 told councils to use the NPPF to protect Green Belt.

“Councils must protect our precious green belt land”

From: Department for Communities and Local Government, Brandon Lewis MP and The Rt Hon Eric Pickles MP

First published: 4 October 2014 # Last updated: 6 October 2014

Part of: Improving the energy efficiency of buildings and using planning to protect the environment, Climate change, Environment and Planning and building

SUE 2c – Sustainable Urban Extension: South of Whiston and Land South of M62

5.44 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the further modifications to the policy would remove the specific reference to housing in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require the development to provide a wider choice of housing in the area. Consequently, given the substantial capacity of the site, it is considered that the policy has the potential to have a positive impact on the objective of providing good quality housing and this impact would become increasingly significant as the development is built out. The policy also promotes a significant amount of employment development in this location and, due to the scale of development that would be delivered, could also encourage further investment in the area, generate employment and training opportunities in the construction sector and help sustain existing local facilities. As such, the policy could also have a major positive impact on the objectives that relate to business growth and productivity; and reducing unemployment; and some positive effect on the objectives concerned with poverty and deprivation; and education and skills.

Any employment gains in the building industry are short term and will have little impact on local unemployment. With the reduction in affordable housing previously mentioned (3.26) how can the massive scale of over 2400 houses have a beneficial effect, without considerable investment in infrastructure. There are only two local primary schools, I question if they would have the capacity to cope with this massive

development. Already in (3.21 & 3.22) the question of environmental and green space negative impacts have been mentioned, a development on this scale would surely cause a negative impact on all those areas mentioned.

5.45 The policy would also result in residential development being directed to a location that is within reasonably close proximity of established employment areas and a number of local facilities, including primary schools, a GP and health centre and a local shopping centre on Greenes Road. It also requires new development in this location to contribute towards public transport provision and improve links to Whiston railway station. As such, the policy could have a positive impact on the objectives that relate to improving access to services and amenities; and the use of more sustainable transport modes.

Local transport in Whiston is very poor and anyone who is not a car owner and lives on Windy Arbor Road, has already seen a reduction in buses available since de-regulation. To suggest building a large number of houses will increase local transport is naïve in the least and downright misleading. The development by Halton in Cronton has not seen a vast increase in bus traffic and hardly a bus is available late at night. The local shopping centre mentioned is log jammed at busy times with cars and deliveries by Artics to Tesco and the odd truck using Whiston as a short cut from Tarbock island. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.46 Given the scale of development promoted, the policy has the potential to generate a significant amount of additional expenditure which could support nearby local centres. As such, the policy has the potential to have a positive impact on the objective that relates to the vitality and viability of town and local centres. In addition, a key element of the proposals for the site is the creation of a country park with associated footpaths, cycleways and bridleways, and the policy also requires development in this location to encourage walking and cycling and provide public open space. As such, it is considered that the policy could support participation in sport and recreation and could therefore have a positive impact on the objective that relates to health.

Why it is necessary for so much land to be considered for removal from the Green Belt, to the south of the M62. Only about a third of this is reported to be for development. It has been said that the rest will form a Country Park, on the Old Cronton Colliery site. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.47 The policy would however have the potential to have a negative impact on a number of objectives. In particular, it directs development to a greenfield site that contains large areas of Grade 2 Best and Most Versatile agricultural land. As such, the policy would have a major negative impact on the objective that relates to protecting land and soil. Directing development to this location would also have a negative impact on the objective that relates to protecting landscape character;

and could have a negative impact on the objective that relates to biodiversity by resulting in the loss of priority habitat and/or by placing pressure on nearby Local Wildlife Sites. Nevertheless, there is only a low level of certainty about the impact of the policy on this objective.

There is a clear admission here of the negative impact of taking this area out of Green Belt. With the increase in Global commodity prices locally produced food is more important. The need to remove Grade 2 Best and Most Versatile agricultural land from the Green Belt is not proven and 5.47 highlights the negative impact of this policy.

5.48 The policy will result in development taking place in a location that is within reasonably close proximity to local facilities and would also require the development to contribute towards public transport, walking and cycling. However, the construction and operation of this development would inevitably result in carbon emissions and would inevitably generate a significant number of vehicular trips and associated emissions. Consequently, the policy has the potential to have some negative impact on the objectives that relate to mitigating climate change; and protecting air quality.

There is a clear admission within (5.48) that the development proposed is identified as having a negative effect on carbon emissions and would certainly fail in meeting our green responsibilities. The mention of a significant number of vehicular trips bears out our belief that there would be a serious impact on traffic congestion within Whiston.

5.49 The policy would also have an uncertain impact on some of the sustainability objectives. Specifically, the policy would result in development being directed to a location that is in close proximity to a number of heritage assets. Nevertheless, due to the scale of the site, there may be scope to incorporate an adequate buffer around these assets to protect their setting. In addition, the policy requires development in this location to comply with Policy SUE 2 which, amongst other things, requires new development to protect and enhance historic and architectural assets. As such, it is uncertain whether the policy would have a significant impact on the objective that relates to preserving and enhancing Knowsley's built heritage.

These comments can only reinforce the need for a structured approach to any release of Green Belt and more time should be spent understanding all the issues before we take a decision that cannot be revoked.

5.50 Although the policy directs development to a greenfield site which has the potential to function as part of the Borough's Green Infrastructure network, it also involves the creation of a country park and the requirement for development in this location to be subject to a master planning should ensure the appropriate retention and provision of objective that relates to providing and conserving green infrastructure is also considered to be uncertain. Areas of

Green Infrastructure. As such, the impact of the policy on the objective that relates to providing and conserving green infrastructure is also considered to be uncertain.

(5.50) Again mentions uncertainty in the council decisions and in my view at least suggests they don't know what will happen when developers have free reign to build on our Green Belt. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.51 Similarly, although the policy would result in development taking place in the vicinity of a number of water bodies, there is limited certainty over whether this would impact on the water quality of these waterbodies. Consequently, it is considered that the policy would also have an uncertain impact on the objective of protecting, improving and where necessary, restoring the quality of inland, and estuarine waters.

We have yet to see a definitive study of water quality after development, and we suggest the loss of some 110 hectares of open countryside will seriously impact local wildlife

KGBS 14 - South of Whiston

5.82 Policy SUE1 identifies South of Whiston as a SUE primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development including the Local Wildlife Site but excluding Public Open Space. This option would not introduce any phasing restrictions but would include a policy requirement for ancillary facilities (e.g. Retail and Public Open Space). The second option considered was to allocate the site for housing development with site-specific allocations for retail and Public Open Space provision but no phasing restrictions. The third option was to allocate the entire site for housing development with no phasing restrictions.

We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision.

5.83 The appraisal concluded that each of these would have a similar impact on a number of the sustainability objectives. In particular, given the substantial capacity of the site, it concluded that each option could have a major positive impact on the objective of providing good quality housing and that this impact would become increasingly significant as the development is built out. However, by introducing a potentially inflexible approach to the provision of open space and retail, the appraisal recognised that Options 2 could have an adverse impact on the deliverability of the site which reduces the level of certainty that the option would have a major positive impact on the objective. Due to the size of the area and the quantum of development it could accommodate, each of the options could also generate a number of employment and training opportunities in the construction sector and

could stimulate further investment in the area. As such, the appraisal noted that each of the options has the potential to have a positive impact on the objectives that relate to reducing deprivation; skills and training; business competitiveness; and unemployment.

Once again there is too much that is hopeful and of little certainty and i would re-iterate my previous comment. We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision. This decision is at odds with local Public opinion and also at odds with the localism bill.

5.84 The appraisal considered that each of the options would also result in development taking place in close proximity to a range of local facilities and amenities including primary schools, a GP and health centre and a local centre on Greene's Road and development in this location could make a contribution to the continued viability of these services and facilities. Options 1 and 2 would also support the provision of certain facilities/amenities within the site. As such, each of the options could have a positive impact on the objective that relates to access to services and amenities but there is a higher level of certainty that Options 1 and 2 would have a positive impact on this objective due to these options resulting in the provision of facilities on-site. Given the significant capacity of the site, each of the options also has the potential to have a positive impact on Knowsley's town centres and the local centre on Greene's Road by increasing levels of expenditure in these centres. As such, each option could have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town centres

The retail centres mentioned at Greenes Road is a small satellite and little could be done to expand it. Increasing the footfall would inevitably increase traffic in what is already a very congested area. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.85 The appraisal did however recognise that each of the options could impact upon the setting and significance of a number of heritage assets and have a negative impact on the objective that relates to Knowsley's built heritage. These assets are however located towards the edges of what is a large site and there may be scope to incorporate an adequate buffer around these assets to protect their setting. Consequently, there is only a limited level of certainty that each option would have a negative impact on this objective. By resulting in the loss of a significant area of greenfield land and by potentially placing pressure on areas of ecological value, each option could also have a negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the

objective that relates to air quality. There is however a lower level of certainty that Options 1 and 2 would have a negative impact on this objective as both of these options would support the provision of some facilities on the site which could reduce the need to travel and associated vehicle emissions. Each option could also have a major negative impact on the objective of adapting to climate change; a negative impact on the objective of mitigating climate change; and an uncertain impact on the objective that relates to protecting water quality.

Once again the councils own comments highlight the negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the objective that relates to air quality, and also increase congestion.

5.86 Each option would result in the loss of a substantial area of greenspace, sections of which are used for informal recreation, and could therefore reduce opportunities for participation in informal sport and recreation and thereby have a negative impact on the objective that relates to health. Nevertheless, Options 1 and 2 would provide support for the retention/provision of areas public open space and could therefore have a positive impact on the objective. Conversely, Option 3 would not support the retention/provision of areas public open space and would therefore have a negative impact on the objective. Options 1 and 2 would also result in the provision of some facilities on the site which could help reduce the need to travel and have a positive impact on the objective that relates to reducing the need to travel and improving the use of more sustainable transport modes. By contrast, as Option 3 would not directly support the provision of on-site facilities, this option has the potential to have a negative impact on this objective.

Once again the councils own comments highlight the negative impact on outdoor activities and recreation for local people.

CS5 - Green Belt

5.133 The revised policy would have a largely similar impact on the sustainability objectives to the version of the policy included in the Core Strategy Submission document.

The use of Green Belt for building is overwhelmingly opposed by the majority of residents. The reason used by the council for use and early release of Green Belt does not meet the NPPF in regard of the 5 purposes of Green belt and Extraordinary needs do not exist, to remove Best and Most Versatile agricultural land. It is also at odds with latest government thinking. See 4.10

5.134 The policy would continue to protect the majority of Green Belt from inappropriate development but, as with the previous version of the policy, would support the identification of a series of sites for release from the Green Belt to ensure that there is sufficient housing and employment land to meet the needs of the Borough. However, the proposed modifications to the policy would mean that the release of these Sustainable Urban Extensions (SUEs) is no longer controlled by a phasing mechanism and the modifications would also result in these sites being allocated for development rather than just identified as broad locations. These modifications mean that the SUEs would now be more likely to come forward earlier in the plan period. As a result, many of the impacts that would have occurred in the longer term under the version of the policy included in the Core Strategy Submission document would now occur earlier in the plan period under the revised policy.

The rapid release of Green Belt land can only be to the benefit of developers and will put back development of brown field sites. The council admitted at the hearing that early release of Green Belt will result in the delay of development of brown fields, and this too is highlighted by latest government thinking, see 4.10. The proposal to release Green Belt early is a poor decision not made in the best interests of local people. We will quickly see what a poor decision it was.

5.135 By continuing to support the identification of SUEs and safeguarded land for housing and employment development the amended policy would continue to ensure that there is sufficient land to meet the Borough's development requirements. It is therefore envisaged that the revised policy would still have a positive effect on the objectives relating to poverty and deprivation; housing; the growth potential of business sectors; and maintaining high and stable levels of employment. However, as noted above, these impacts are now predicted to occur earlier in the plan period. In addition, by potentially resulting in the SUEs coming forward earlier in the plan period, the modifications to the policy could result in the SUEs competing with the Council's regeneration objectives for urban areas. As a result, the modifications to the policy reduce the level of certainty that it would have a positive impact on the objective that relates to poverty and deprivation.

The proposal to release Green Belt early will impact on the council stated regeneration objectives. Little in the way of long term employment will come from vast housing estates, only a greater demand on roads, schools, GP's and a lowering of air & water quality with an increase in noise pollution.

5.136 In addition, as the amended policy would result in some housing and employment development taking place in areas on a series of predominantly greenfield sites that are presently within the Green Belt, it could have a negative effect on the objective relating to land and soil and an uncertain effect on the objectives relating to landscape character and accessibility; and Green Infrastructure. Key mitigation measures to address some of these impacts will include ensuring new

development is built to an appropriate density, retaining areas of woodland, securing the provision of on-site open space, and securing appropriate landscaping to moderate the impact of proposals on the local landscape character.

I have already called into dispute the density quoted by the council as the proposal in South Whiston and the Council average density of 30 dwellings per hectare is significantly above the information they have given the public and what they have consulted on. Consultation is 1503 against 2481 according to calculation using average density(4.10). Latest planning applications are far in excess of what the public were told, Recently Knowsley gave outline planning permission for 207 dwellings at Bank Lane, Kirkby (even though the site is still in the Green Belt). This is a difference of 76 dwellings, and represents a 58% increase on the capacity that Knowsley Council said the site had.

5.137 As some of the SUEs are used for informal recreation and others contain sports pitches, it is considered that the revised policy could also still have a long term negative impact on health. The proximity of some of the locations to designated heritage assets and the presence of archaeological assets within some of locations mean that the revised policy would also still have an uncertain impact on the objective relating to built heritage in the longer term. It is also considered that the policy still has the potential to have a negative impact on the objective relating to biodiversity. Undertaking ecological surveys, excluding areas of priority habitat from the developable area and the provision of on-site habitats are all likely to be key mitigation measures. However, as noted above, these impacts are now predicted to occur earlier in the plan period.

Uncertain impact on archaeological assets within the area will be compromised. We have not seen Ecological research to discredit the assertion that removing this area from Green Belt will not have a catastrophic effect. The modifications will bring the ecological disaster forward, so that we may see them before our Grandchildren do.

5.138 The revised policy still would have the potential to result in more dispersed patterns of development. In addition, the construction and operation of the development that would be delivered on the SUEs would inevitably result in carbon dioxide emissions. Consequently, and notwithstanding the fact that the Knowsley Local Plan Transport Feasibility Assessment (2012) identified that some of these locations have good accessibility to bus routes, cycle routes and services and facilities, it is considered that the revised policy would still have an uncertain effect on the objectives relating to mitigating climate change; protecting air quality; and minimising the need to travel.

This point is broadly supporting our ascertainment as to the detrimental impact on traffic within the area. Local People contest the accuracy of the Knowsley Local Plan Transport Feasibility Assessment (2012) as our research carried out by local people show more than 400 vehicles per 30 minute session at peak times and if deliveries took place to Tesco with Artic then the whole area became log jammed. Only one bus per

hour was spotted until 7pm when the service stopped. We would assert that the transport assessment is out of date and not relevant to the increase in traffic we have seen and would call for another assessment to be carried out.

CS14: Principal Regeneration Area – Prescot Town Centre

5.156 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process. The revised policy would still direct investment to Prescot town centre and would seek to intensify its retail function, encourage a wider mix of uses and create a distinctive identity and a complimentary evening economy. As such, the revised policy would still have the potential to have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town and local centres. The amended policy wording does however remove some of the restrictions placed on retail development in Cables Retail Park. In particular, it is no longer specified that retail development within Cables Retail Park should provide for convenience or bulky goods retailing and should maintain the current retail floorspace capacity of the Retail Park. These amendments could increase the scope for further investment in the Retail Park and result in a consequential reduction in investment in Prescot town centre, particularly as the Knowsley Local Plan Economic Viability Assessment (2012) indicates that comparison retail in Prescot town centre is generally unviable in current market conditions. This reduces the level of certainty that the revised policy would have a positive effect on the objective.

Prescot town centre is run down and irrelevant in retail terms, even the council have had to move offices to an ex pub at vast expense, just to fill another empty building. When the council allowed Tesco to build a massive supermarket at Cables Retail park it is as good as sounded the death knell of Prescot town centre. (5.156) Broadly agrees with our assessment.

5.157 By reducing the level of certainty that the policy would support investment in Prescot town centre, these proposed amendments mean that there is also a lower level of certainty that the revised policy would have a major positive impact on the objective that relates to protecting and enhancing Knowsley's built heritage.

Not proved

5.159 There are no anticipated negative effects on the sustainability objectives. The proposed modifications would not however prevent the policy from having an uncertain impact on the objective relating to mitigating climate change

Not proved. Agrees with earlier points that state the policy will have a detrimental effect on climate change.

5.177 The revised policy also still encourages the re-use of vacant and underused historic assets and states that favourable consideration will be given to schemes that enhance the importance of the asset for the economy. The policy could thereby result in the creation of premises for new businesses. In addition, protecting and enhancing buildings and features of historic interest should help create more attractive places to invest in and could lead to enhancements to Prescot town centre. Consequently, the amended policy would also continue to have the potential to have a positive effect on the objectives relating to poverty and deprivation; increasing the number of new businesses; enhancing the vitality and viability of town and local centres; and maintaining high and stable levels of employment and reducing long-term unemployment.

Developers will not consider run down existing areas, whilst vast areas of Green Belt are available, which are considerably easier to develop.

CS21: Green spaces and Trees

5.179 The proposed modifications to the policy would have some impact on the performance of the policy against a number of sustainability objectives. In particular, although the revised policy still seeks to resist new development which would result in the loss of greenspace and would provide support for the provision of new areas of greenspace, the modifications to the policy mean that it would now encourage the retention of existing trees and woodlands and the appropriate planting of new trees rather than require this. This amendment to the policy wording is considered to reduce the level of certainty that existing trees would be retained and new planting secured. Consequently, whilst it is considered that other aspects of the policy would ensure that it continues to have a major positive impact on the objectives that relate to landscape character and green infrastructure; and a positive impact on the objectives that are concerned with adapting to climate change; mitigating climate change; water quality; and air quality; it is considered that this modification results in only moderate certainty that the policy would have a positive effect on these objectives.

Once Knowlsey has shown itself to be open to removing Green Belt from protection, future planning applications will use this behaviour to push for more releases. This is a slippery slope that Knowlsey council have embarked on which will create a borough which only has an ex tip and non-public green space.

5.181 The revised policy would still seek to resist the loss of greenspace and would provide support for the improvement of existing public open spaces and encourage the provision of new greenspaces. It could therefore help provide opportunities for participation in sport and recreation which would have a positive effect on the objectives relating to health; and poverty and social deprivation. It is however recognised that the provision of opportunities for sport and recreation does not necessarily guarantee engagement in these activities and, as a result,

there is only a low level of certainty about the effect on these objectives.

I would welcome the opportunity to see where Knowsley believe they can get new green spaces from? Also the council have overstated the positive impact on health, poverty and social deprivation that a vast estate of houses can have. It is more likely that this influx of residents could also increase anti-social behaviour.

CS22: Sustainable and Low Carbon Development

5.183 It is envisaged that the proposed modifications to the policy for Sustainable and Low Carbon Development would have a number of impacts on its performance in the sustainability appraisal process. The amended policy still requires development to incorporate a range of measures which would improve its sustainability. Nevertheless, the removal of the requirement for new development to achieve particular Code for Sustainable Homes/BREEAM standards and the removal of the requirement for development to incorporate decentralised and low carbon energy, means that there is a lower level of certainty that the policy would have a major positive effect on the objective that relates to mitigating climate change. Similarly, by not requiring new development to achieve particular Code for Sustainable Homes/BREEAM standards it is considered that the policy is less likely to result in new developments which incorporate water conservation measures or make use of recycled materials. As such, the proposed modifications mean that there is a lower level of certainty that the policy would have a positive impact on the objectives that relate to minimising the production of waste and increasing recycling rates; and ensuring the prudent use of water and mineral resources.

To remove the need for developers to meet Code for Sustainable Homes/BREEAM standards is another nail in the coffin of our councils green credentials. It is a bizarre decision at the start of the 21st century, particularly as we all face the prospect of climate change. The demand on energy, water and other resources is likely to be much higher.

5.184 In addition, the removal of the requirement to achieve certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.

Once again this point is totally at odds with other statements and shows that there would be a negative effect on the objectives that relates to poverty and deprivation; and health.



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Sarah-Jane Jarman	
Job Title (if appropriate)	n/a	
Organisation (if appropriate)	n/a	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Sarah-Jane Jarman

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KGBS14

Paragraph Ref

ENTIRE
PLAN

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I do not feel that the plan is sound. The circumstances are NOT exceptional. Like many who actually live in Knowsley (unlike the planners), someone who pays council tax to Knowsley, works in the local area and has children in the local schools (unlike the planners) I can see there is actually very little greenbelt left within Knowsley.

Statistically your plan suggests that there will be a reduction of greenbelt less than 10% however using this misleading statistic cannot hide the fact that the MAJORITY of greenbelt within Knowsley is either in private hands (predominantly the estate of Lord Derby) and therefore not accessible by the local residents, or is providing a barrier to the 2 major motorways, several expressways/bypasses and many, many dual carriageways we have here (again not accessible).

This area is socially deprived; releasing greenbelt to providing housing for yet more social housing is not going to increase the coffers in the way (it would seem) the planners consider probable. There are many empty homes within Knowsley already (including South Whiston) and without green spaces, there will be no way of attracting the affluence Knowsley planning seem to be seeking.

There are few jobs in our area, more people mean there will be even fewer chances for work opportunity and this can only increase the social burden we carry within Knowsley already.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Eric Pickles Secretary of State for Communities and Local Government has been vocal in his advocacy for protecting our greenbelt, you have continually chosen destruction of the greenbelt over the correct and legal option of developing brownfield sites (of which there are MANY) in this area. The plan can be changed to reflect this – yet the ‘soft’ option has been chosen in every case.

Social aspects MUST be considered. As the developers already own the land, you releasing it will ensure they get their diggers in as quickly as possible, however you have failed to put the infrastructure in place to support this. There are inadequate facilities in respect of schools, roads and healthcare, an up-to-date survey MUST be completed in respect of traffic, CCG (GP) waiting lists and access to schools, particularly secondary. The old surveys quoted in the plan are now more than obsolete and must be repeated.

There must be more employment opportunities to ensure that Knowsley does not become even more deprived with even higher levels of poverty, releasing greenbelt will not aid in this.

The consultation has been woeful – your own staff in ‘One-Stop’ shops were unaware that they had the information to provide to people, so how could the public be informed? A proper consultation of the people of Whiston MUST be undertaken, the links on the website must be available at all times (your link was down for the first 3 weeks of the consultation process) to allow residents their say, which is why local residents had to take their own time and money to print hard copies of the forms for their neighbours.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

12/11/14

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council



RETURNING THIS FORM

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Suzanne Lewis	
Job Title (if appropriate)	Receptionist	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The councils philosophy about new housing correlating to economic development and population erosion is fundamentally flawed. See first para in document KGBS14 SA objected ECI (above) outlining 'none of the options for land to the south of which include an employment element. May encourage further investment in the area sustaining local employment and also potentially bringing new jobs into the area is not a "sound" reason for economic development and productivity of business as stated in document KGBS14 SA objective ECI

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Use the latest figures from the office of national statistics to carry out an up to date housing requirement.
Traffic Management surveys taking into account the existing peak time traffic and extra traffic of at least 2500 vehicles.
Develop empty properties and brownfield sites first.
Put green belt release back until last and consider all other options first
Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 1st / 11 / 14

09 POLICY CS4 SUPPLY

Representations relating to Policy CS4: Economy and Employment,
specifically relating to employment supply

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS4 SUPPLY 001	1	121	A E Sherlock, Petition (60)
POLICY CS4 SUPPLY 002	1	153	Barbara Anderson
POLICY CS4 SUPPLY 003	1	178	Charles Alfred Daly
POLICY CS4 SUPPLY 004	1	180	Cheryl Cunningham
POLICY CS4 SUPPLY 005	1	181	Chris Thompson
POLICY CS4 SUPPLY 006	1	199	Darren Seddon
POLICY CS4 SUPPLY 007	1	200	Dave Sephton
POLICY CS4 SUPPLY 008	1	204	David Dickinson, Highways Agency
POLICY CS4 SUPPLY 009	1	205	David Holmes (1)
POLICY CS4 SUPPLY 010	2	205	David Holmes (7)
		454	Patricia McDonald-Holmes (7)
POLICY CS4 SUPPLY 011	1	28	David Kent
POLICY CS4 SUPPLY 012	1	206	David Kernick
POLICY CS4 SUPPLY 013	1	112	Debbie King (2)
POLICY CS4 SUPPLY 014	1	210	Debbie Lewis (2)
POLICY CS4 SUPPLY 015	1	215	Dennis Jones
POLICY CS4 SUPPLY 016	1	217	Derek Muirhead
POLICY CS4 SUPPLY 017	1	17	Edward Bean
POLICY CS4 SUPPLY 018	1	227	Elaine Hanley
POLICY CS4 SUPPLY 019	1	232	Elesta Muirhead
POLICY CS4 SUPPLY 020	1	243	Eric Stephenson
POLICY CS4 SUPPLY 021	1	245	Frances Parry
POLICY CS4 SUPPLY 022	1	246	Francis Moore
POLICY CS4 SUPPLY 023	1	272	Ian Banawich
POLICY CS4 SUPPLY 024	1	274	Ian Holland
POLICY CS4 SUPPLY 025	1	279	Irene Davis (3)
POLICY CS4 SUPPLY 026	1	287	J Waring
POLICY CS4 SUPPLY 027	1	288	Jack and Barbara Creer
POLICY CS4 SUPPLY 028	1	290	Jacqueline Lunt
POLICY CS4 SUPPLY 029	1	292	James O'Rourke
POLICY CS4 SUPPLY 030	1	293	James R Ormond
POLICY CS4 SUPPLY 031	1	297	Janet Crehan
POLICY CS4 SUPPLY 032	1	299	Janet Rourke
POLICY CS4 SUPPLY 033	1	18	Jason Brown
POLICY CS4 SUPPLY 034	1	304	Jean Philips
POLICY CS4 SUPPLY 035	1	314	Jennifer Mullin
POLICY CS4 SUPPLY 036	1	320	Joan Medder
POLICY CS4 SUPPLY 037	1	327	John Jones

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS4 SUPPLY 038	1	328	John McCormack
POLICY CS4 SUPPLY 039	1	341	Julie Anne Parker (1)
POLICY CS4 SUPPLY 040	1	343	June Anders
POLICY CS4 SUPPLY 041	1	346	Karen Easton
POLICY CS4 SUPPLY 042	1	351	Katy Andrews
POLICY CS4 SUPPLY 043	1	352	Kay Brown
POLICY CS4 SUPPLY 044	1	354	Keith Easton
POLICY CS4 SUPPLY 045	1	357	Keith Sharp
POLICY CS4 SUPPLY 046	1	359	Keith Wooding
POLICY CS4 SUPPLY 047	1	363	Kirsty Easton
POLICY CS4 SUPPLY 048	4	364	Kirsty Meredith
		444	Nicola Meredith
		468	Paula Meredith
		94	T W Bretherton
POLICY CS4 SUPPLY 049	1	78	Lesley Dunn
POLICY CS4 SUPPLY 050	1	393	Malika Pachi
POLICY CS4 SUPPLY 051	1	403	Marie Ormond
POLICY CS4 SUPPLY 052	1	407	Mark Inman
POLICY CS4 SUPPLY 053	1	408	Mark Jones
POLICY CS4 SUPPLY 054	1	27	Maurice Steele
POLICY CS4 SUPPLY 055	1	422	Michael Humphreys
POLICY CS4 SUPPLY 056	1	423	Michael James
POLICY CS4 SUPPLY 057	1	426	Michelle Inman
POLICY CS4 SUPPLY 058	1	431	Mr and Mrs McMullen (1)
POLICY CS4 SUPPLY 059	1	431	Mr and Mrs McMullen (2)
POLICY CS4 SUPPLY 060	1	433	Myra Hankey
POLICY CS4 SUPPLY 061	1	453	Patricia Dobson, Michael Bailiff
POLICY CS4 SUPPLY 062	1	454	Patricia McDonald-Holmes (5)
POLICY CS4 SUPPLY 063	1	458	Paul Crouch
POLICY CS4 SUPPLY 064	1	461	Paul Marshall
POLICY CS4 SUPPLY 065	1	466	Paula Day
POLICY CS4 SUPPLY 066	1	473	Pauline Jones
POLICY CS4 SUPPLY 067	1	474	Pete Lamble
POLICY CS4 SUPPLY 068	1	476	Peter Bracken (1)
POLICY CS4 SUPPLY 069	1	21 and 80	Peter Monaghan (1)
POLICY CS4 SUPPLY 070	1	481	Philip Jennings
POLICY CS4 SUPPLY 071	1	482	Philip Jones
POLICY CS4 SUPPLY 072	1	483	Philip Williamson
POLICY CS4 SUPPLY 073	1	486	R Martin
POLICY CS4 SUPPLY 074	1	488	Rachel Freeman
POLICY CS4 SUPPLY 075	1	490	Ray and Lesley Harrison
POLICY CS4 SUPPLY 076	1	501	Ronald Prescott
POLICY CS4 SUPPLY 077	1	503	Roy Easton

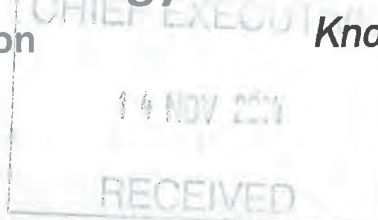
Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS4 SUPPLY 078	1	504	Roy Hardman
POLICY CS4 SUPPLY 079	1	536	Susan Bently
POLICY CS4 SUPPLY 080	1	541	Susan Smith
POLICY CS4 SUPPLY 081	1	542	Suzanne Lewis
POLICY CS4 SUPPLY 082	1	7	Vitti Osbourne, Cronton Parish Council
POLICY CS4 SUPPLY 083	1	568	Yvonne Owens
Total	87		



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	A. E. SHERLOCK	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation MR. A. E. SHERLOCK

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref M168
M161
M157
PLUS DOC. C508c Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

MAIN DOCUMENT REFS. (THOUGH MANY OTHERS INVOLVED). DOC C508c
M168 M161 M157

RE. GREEN BELT SITES A57/A58/KNOWSLEY PARK LANE, LAND TO THE REAR OF BEESELEY AND FIELDS SITE. FARMLAND BETWEEN KNOWSLEY LANE (B5194) AND M57 AND LAND BETWEEN M57 AND CARR LANE ALL POST CODE L34

THE PLAN AS PROPOSED DOES NOT APPEAR TO SHOW HOW KNOWSLEY COUNCIL HAS ARRIVED AT THE CHOICE OF THE ABOVE MENTIONED GREEN BELT SITES, WHEN THERE ARE ALREADY A NUMBER OF BROWNFIELD SITES AVAILABLE IN THE LOCALITY. LIKEWISE MANY BUSINESS UNITS BOTH FOR OFFICES AND LIGHT INDUSTRIAL USE ARE STILL

Continue on a separate sheet if necessary...

PRESENTATIONS FORM CONTINUATION SHEET (1)
MR A.E. SHERLOCK

T.

EMPTY IN THE BOROUGH FROM PREVIOUS DEVELOPMENTS. EQUALLY THERE ARE A NUMBER OF HOUSING DEVELOPMENTS ALREADY UNDERWAY AND MANY OF THESE ARE AS YET UNSOLD AND UNOCCUPIED AS IS CLEAR FROM THE NUMBER OF "TO LET" AND "FOR SALE" SIGNS ON DISPLAY.

IT IS ALSO EVIDENT FROM THE NUMBER OF BOARDED UP PROPERTIES AROUND THE BOROUGH THAT A HOUSING SHORTAGE DOES NOT APPEAR TO BE THE PROBLEM, MORE A SHORTAGE OF PEOPLE TO TAKE THEM.

TO PURSUE WITH THE PLAN AS DETAILED FOR A57/A58/ KNOWS PARK LANE AND THE FARMLAND BETWEEN THE M57 AND KNOWSLEY LANE WOULD ALSO BRING CLOSER A MERGING OF THE TOWN OF PRESCOT WITH THE TOWN OF HUXTON WHICH AS YOU KNOW LOST ITS VILLAGE APPEARANCE AND CHARM MANY YEARS AGO. SURELY THIS WOULD BE CONTRARY TO (NATIONAL PLANNING POLICY FRAMEWORK DOCUMENT TOWN AND COUNTRY PLANNING REGULATIONS)

ALL THREE OF THE ABOVE GREEN SITES ARE HOME TO A VARIETY OF FLORA AND FAUNA AND SPECIES ON THE AT RISK REGISTER I.E. LAPWING, SKYLARK, BATS AND CRESTED NEWTS TO NAME A FEW. TWO OF THE SITES ALSO SUPPORT FARM ANIMALS AND BY IMPLICATION THE LIVELIHOOD OF THE FARMER. THE AREA OF WOODLAND LEADING TO KNOWSLEY HALL ALONG GEORGE HALE AVENUE CONSIST MOSTLY OF NATIVE SPECIES OF TREES AND IS SEVERAL HUNDRED YEARS OLD.

GREEN BELT AREAS ARE FEW IN NUMBER IN THE BOROUGH OF KNOWSLEY AND PROVIDE AN IMPORTANT OASIS OF GREEN SPACE IN WHAT HAS OVER THE YEARS BECOME A VAST URBAN SPRAWL OF HOUSING AND INDUSTRIAL DEVELOPMENT.

CONTINUED —

MR. A. E. SHERLOCK

CONT. -

THE AREAS IMMEDIATELY AFFECTED BY THESE PROPOSALS WOULD ALSO BE COMPROMISED BY THE ADDITIONAL AIR POLLUTION FROM AN INCREASE IN TRAFFIC AND CONGESTION ON ALREADY BUSY ROADS.

KNOWSLEY MAY NOT BE AN AREA OF OUTSTANDING NATURAL BEAUTY BUT WHAT FEW GREEN AREAS REMAIN SHOULD BE KEPT FOR THE SAKE OF THE ENVIRONMENT AND FUTURE GENERATIONS. ANY FURTHER ENCROACHMENT INTO THESE VALUABLE GREEN AREAS WOULD BE TANTAMOUNT TO ENVIRONMENTAL VANDALISM.

I BELIEVE THAT THE PLANNED CHANGES WOULD BE CONTRARY TO NATIONAL PLANNING POLICY FRAMEWORK DOCUMENT, TOWN AND COUNTRY PLANNING REGULATIONS SUSTAINABILITY APPRAISAL REPORT.

ATTACHED ARE A LIST OF NAMES AND ADDRESSES OF PEOPLE SUPPORTING THIS REPRESENTATION

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

FULL USE SHOULD BE MADE OF THE AVAILABLE BROWNFIELD SITES BEFORE ANY GREEN BELT LAND IS CONSIDERED. ALSO ATTENTION TO THE ALREADY EXTENSIVE HOUSE BUILDING BUSINESS AND RETAIL DEVELOPMENTS ALREADY IN PLACE AND ONGOING.

FOR A COUNTRY THAT CANNOT MEET ITS OWN FOOD PRODUCTION REQUIREMENTS IT IS INCOMPREHENSIBLE THAT GOOD QUALITY FARMLAND IS TO BE SACRIFICED FOR THE SAKE OF SO CALLED PROGRESS.

PARTICULAR ATTENTION SHOULD BE PAID IN THIS CASE TO THE GOVERNMENT'S RECENTLY (OCT 2014) PUBLISHED GUIDANCE TO REINFORCE GREENBELT PROTECTION E.G. "ESTABLISHED GREENBELT BOUNDARIES SHOULD ONLY BE ALTERED IN EXCEPTIONAL CIRCUMSTANCES UNDER UPDATED GUIDANCE PUBLISHED BY THE DEPARTMENT FOR COMMUNITIES AND LOCAL GOVERNMENT (REF UPDATES TO THE PLANNING PRACTICE GUIDANCE DOCUMENT)

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature 

Date 12-11-14

HELP SAVE OUR GREEN BELT

All the land between the Clock Face pub, A57 and A58 Prescot by-pass (Whittaker's Nursery site) is under imminent threat from developers, as is the farmland between Knowsley Lane and the M57 at Hillside, and also green belt land at the bottom of Carr Lane, Prescot.

By signing our petition you can help to protect this precious green space.

Alternatively object directly to: Local Plan Team, Knowsley Council, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool L36 9YU (**Note deadline 14th November 2014**).

Further information on Knowsley Council's plans to build on Green Belt **throughout** the borough can be viewed at www.knowsley.gov.uk/localplan

JOHN BENNETT

MAUREEN STEWART

PETER RAYNOR

LINDA RAYNOR

Christine DeLeon

Michael DeLeon

Sara Ferrina

HARLY RUSH

MARIE RUSLI

James Rush

COLIN McNALLY

JANET McNALLY

MARTIN LAVELLE

BRENDA LAVELLE

Nicola Lavelle

Andrew Lavelle

Kyle Mogan

~~Ken Mogan~~

JOHN CRAWFORD

Margaret Mowat

Rachael King

Gary King

Daniel King

Shelia Petherick

E. Ridley

with

AGRAVE

Mrs Cuthbert

N W

K. HYLAND

L. ROBINSON

P. McCarron

B. Cress

G. Green

R. McCarron

A. McCarron

Smearon

H. McCarron

P. McCarron

A. McCarron

P. White

K. Pat

SO Bin

For the
A. Carter

Dei

BAO

D. Johns

~~Cover~~

~~Dan~~

~~Law~~

78

AMC

as seen

Y Johnson

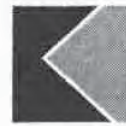
LITL

Emma Tutton

W. MORSON

K. MORSON

A. SHARLOCK



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council

RECEIVED
14 NOV 2014

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	BARBARA ANDERSON	
Job Title (if appropriate)	MERCHADISER	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation BARBARA ANDERSON

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref KGBS14 Policy Ref Paragraph Ref EC1-622 B1
~~EC1-622 B1~~

WILKINSON SOUTH

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

As a local resident I do not think the local Council have given all residents in the area sufficient information about this plan which will effect all the residents, now and in the future.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Green Belt land should only be released when existing Brown Field Sites have been developed.

Traffic in the area will be increased greatly on the local roads.

The air quality will be effected, the area is already surrounded by Motorways (M62 & M57) causing pollution.

The only remaining farming land in Whiston will be lost.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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Signature

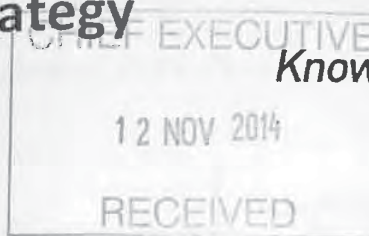


Date 8-11-14



Knowsley Local Plan: Core Strategy

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Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	CHARLES ALFRED DAWY	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I WISH TO OBJECT TO THE PROPOSED PLANS MY REASONS ARE AS FOLLOWS
WHISTON IS THE LAST GREENBELT AND TO DEVELOP IT WOULD BE A
BIG LOSS TO OUR NATURAL ENVIRONMENT. WE NEED TO STOP URBAN
SPRAWL AND THIS PROPOSAL WILL EXACERBATE OUR VILLAGE. OUR
GREEN SPACES WOULD BE LOST FOR SOCIAL USAGE.
WILDLIFE WOULD BE DISTURBED IF NOT LOST FOREVER
IN KNOWSLEY WE HAVE 500 REGISTERED BEE KEEPERS THE
BBKA (THE BRITISH BEE KEEPING ASSOCIATION) HAS IDENTIFIED
THAT ONE IN THREE MOUTHFULS OF FOOD EATEN IS
DEPENDENT ON THE POLLINATION OF THE BEES. WE
NEED TO MAINTAIN OUR LEVELS OF BEE HIVES FOR OUR
GENERATION AND GENERATIONS TO COME,

Continue on a separate sheet if necessary...

If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

TO INSPECTOR MARTIN PIKE PLEASE SERIOUSLY
CONSIDER TAKING INTO ACCOUNT THE GUIDANCE FROM
ERIC PICKLES M.P. ON THE 16/10/2014 TO KEEP
OUR GREENBELT (GREEN) AND USE BROWNFIELD
SITES ONLY.

AN UP TO DATE SURVEY IS REQUIRED FOR TRANSPORT
IN THE AREA AND HOW IT WILL EFFECT CURRENT
RESIDENTS ETC.

ALSO TAKE INTO ACCOUNT THE LATEST POPULATION
FIGURE FROM O.N.S 2014

ASK KNOWSEY TO DO A GEOLOGICAL SURVEY AS MOST
OF THE PROPOSED LAND IS HONEYCOMBED WITH OLD MINE
WORKINGS. THIS WAS THE REASON CRONTON COLLIERY
WAS CLOSED DOWN A MAJOR GEOLOGICAL FAULT

WE NEED YOU TO RECONVENE A PUBLIC INSPECTION

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 1-31-2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE **Knowsley Council**

12 NOV 2014

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	mes	
Name	Cheryl Cunningham	
Job Title (if appropriate)	NHS	
Organisation (if appropriate)		
Postal Address ▲	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGB 14

Policy Ref

EC 1

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

• The protection of GREEN BELT LAND!

If the said proposals go through our children will only grow up with bricks and mortar in our neighbourhood and not beautiful green trees, wild flowers, wild life and bees and the beautiful green fields we have.

Our local character will be lost for ever.

The History of our once mining community will be lost for ever. Our children need green land and history behind it.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

MP Eric Pickles has already said we are using too much greenbelt land and should be looking at the brown land instead?
Utilise the housing we already have.
The survey for ONS need updating as it is so behind in its findings as to our public transport systems.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1.11.14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title <i>MR</i>		
Name	<i>CHRIS THOMPSON</i>	
Job Title (if appropriate)	<i>DRIVER</i>	
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref UG13516 Policy Ref → Paragraph Ref G1

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

To protect, enhance and manage the local character and accessibility of the landscape and ensure some across knowledge

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All the conditions have ~~been~~ already made
Bramfield's should be released
before green belt as stated by
the government.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1 Nov 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	DARREN SEDDON	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

DARREN SEDDON

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

WGRS14

Paragraph Ref

EC3

2. Do you consider that the proposed modification is ? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Whiston Village is undermined owing to large retail park at Prescot. Further outlet would lead to local shops closing with disused buildings becoming unsightly and dangerous. If outside contractors come in they would use outside labour & not local people. Future employment opportunities for locals is overstated & aspirational. There are no guarantees and therefore people will come to the area with no or little employment opportunities. "Executive aspirations" are unachievable in this area.

Continue on a separate sheet if necessary

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- 1) Take into account Eric Pickles M.P. comments on Oct. 16 2014
- 2) Take into account O.N.S. Population figures for 2014
- 3) Re-convene public inspectors & carry out up to date transport survey.

Continue on a separate sheet if necessary

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council

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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR. SEPTON	
Name	DAVE SEPTON DAVE SEPTON	
Job Title (if appropriate)	DOUG WALKER DOG WALKER	
Organisation (if appropriate)	DOG WALKER TRUST DOGS TRUST	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

i OBJECT BECAUSE: -

- ① THE LOSS OF COUNTRYSIDE, BECAUSE OF THE INCREASED URBAN SPRAWL.
- ② LOSS OF ACCESS TO A NATURAL ENVIRONMENT.
- ③ GREEN BELT PLEXES (LIKE OLD WOOD + BIG WATER) WILL NO LONGER BE ACCESSIBLE TO THE PUBLIC.
- ④ THE PROPOSED NEGATIVE EFFECT ON THE IMPORTANT BEE POPULATION.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

WHY NOT USE 'BROWNFIED' SIDES, WHICH
ARE SITUATED LOCALLY AND THUS THE LOSS
WOULD BE LESS SEVERE.
ALSO, THERE IS A DISTINCT DANGER THAT,
IN THE CURRENT CLIMATE, PEOPLE WOULD BE
UNABLE TO OBTAIN NECESSARY MORTGAGES.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 1.11.2014.



Safe roads, reliable journeys, informed travellers

Local Plan Team
 Knowsley Council
 1st Floor Annexe
 Municipal Buildings
 Archway Road
 Liverpool
 L36 9YU

David Dickinson
 Asset Manager

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

12 November 2014

For the attention of Local Plan Team

CONSULTATION ON KNOWSLEY COUNCIL MODIFICATIONS TO THE KNOWSLEY LOCAL PLAN: CORE STRATEGY AND SUSTAINABLE URBAN EXTENSIONS SUPPLEMENTARY PLANNING DOCUMENTS

The Highways Agency (the Agency) would like to thank Knowsley Council for providing the opportunity to make comments on the modifications to the Knowsley Local Plan Core Strategy and providing the ability to influence the direction of the Supplementary Planning Documents that will be prepared for the Sustainable Urban Extensions at Knowsley lane, Huyton; East of Halewood; and South of Whiston/land south of the M62.

This response follows that made by the Agency in October in relation to the draft Supplementary Planning Documents (SPD) and Local Development Orders (LDO).

As requested, we provide our response in the form made available as part of the consultation documentation and attach this alongside this cover letter. To summarise our response, I provide information below.

Core Strategy Submission Document Proposed Modifications (Public Consultation Version September 2014)

Reason for Highways Agency Response

You will be aware that the Agency has not previously made any detailed consultation comments during the preparation of the Core Strategy document or during the Examination in Public. However, it is clear from the modifications to the strategy that there are elements of the identified development (the Sustainable Urban Extensions (SUEs)), which were previously identified as being “reserved” or “safeguarded”, but are now termed as “allocations” within the Core Strategy document. The Agency considers this to be a fundamental change to the plan.

The Agency had previously envisaged that all allocations would be made in *The Local Plan: Site Allocations and Development Policies* document and generally adopts an

Page 1 of 6



An executive agency of the
 Department for Transport

approach of requiring a suitable evidence base to be developed at that stage of the Local Plan process. This situation has clearly changed in respect of the SUEs and as such the Agency provides this response.

Comments on the Sustainable Urban Extensions policies

The modifications to the Knowsley Local Plan: Core Strategy reveal a new chapter, 6A, detailing the SUEs and Safeguarded Land which includes five new policies; SUE 1, SUE 2 and SUE 2a) to c).

Reference is made to the studies undertaken to ensure the most appropriate locations for the SUEs, namely the *Knowsley and Sefton Green Belt Study* and *Green Belt Technical Report* (stated in 6A.3 and 6A.4), which in turn reference the findings of the *Transport Feasibility Study* in regards to the trip generation of each new development. It is apparent to the Agency however that the scales, sizes and land uses of the SUEs have since been altered within the modified Core Strategy from the data used in the *Transport Feasibility Study* although no evidence of making the relevant alterations to the analysis is provided. Table 1 summarises the changes in development scales of each of the SUE sites, where it can be seen that, in the main, the scale of development proposed at each site is less in the Core Strategy allocation than assessed within the *Transport Feasibility Study*.

TABLE 1
Development Scale – Comparison of Core Strategy Proposed Modifications policy “allocations” and Transport Feasibility Study

Core Strategy Proposed Modifications policy "allocations"				Transport Feasibility Study				Change	
Site	Site type	Residential (dwellings)	Employment (hectares)	Site reference	Site type	Estimated Residential Capacity (dwellings)	Estimated Employment Capacity (hectares)	Change in Residential Capacity (dwellings)	Change in Employment Capacity (hectares)
Bank Lane, Kirkby	Residential	207	0	7	Residential	190	0	17	0
East of Knowsley Industrial and Business Parks, Kirkby	Employment	0	7.2	16	Employment	0	25	0	-17.8
Knowsley lane, Huyton	Residential	94	0	12	Residential	840	0	-746	0
	Employment (B1)	0	16		Employment	0	13	0	3
Edenhurst Avenue	Residential	86	0	8	Residential	90	0	-4	0
Land bounded by A58, Prescot	Residential	133	0	10	Residential	330	0	-197	0
Carr Lane, Prescot	Residential	74	0	15	Employment	0	3	74	-3
East of Halewood	Residential	1124	0	9 / 13	Residential	1440	0	-316	0
South of Whiston	Residential	1503	0	11 / 14	Residential	1900	0	-397	0
Land South of M62 (employment and country park)	Employment (B8) and country park	0	22.51	17	Employment	0	77	0	-54.49
		3221	45.71			4790	118	-1569	-72.29

Notes:
 Information from SUE policies and Appendix E (Allocations profiles)

Notes:
 Information in Table 4.2 of study report

Colour Key:
 Increase
 Decrease

The Agency made comments in relation to the analysis undertaken as part of the *Transport Feasibility Study* in early 2013, with the following providing a general overview:

- Without commenting on the detail, the analytical approach appeared suitable.
- There were developments which had the potential to have implications on the operation of the strategic road network (individually and cumulatively).

- In looking at the Cronton Colliery site in detail (the focus of the review at that time), there were issues identified in relation to the trip generation calculations, mainly meaning that the trip generating potential had been overestimated in the study.
- Significant impacts at the strategic road network were identified, but the implications of such impacts would need to be fully considered to enable a view to be taken in relation to future network implications and measures required to support the development aspirations.
- The study was supported by the *Transport Modelling Report (TMR)* which assessed the transport impacts of the development proposals within the Core Strategy. This identified the areas of concern, which included the Tarbock Island interchange.
- However from the plots from the TMR it was not possible to consider the influence on the performance at the strategic road network in full and more detailed information relating to the strategic road network was requested.

To understand the consideration of the *Transport Feasibility Study* in trip generation potential terms when considered against the currently envisaged site potential (i.e. the difference in trip generating potential of the difference in development type / scale identified in Table 1 above), a comparative analysis of trip generation has been undertaken. This is presented in Table 2 below, which for the current scale of development identified in the Core Strategy has been undertaken on the basis of Highways Agency generic trip rates. As with the findings of Table 1, the trip generating potential of each site is in the main significantly less in the Core Strategy allocation than assessed within the *Transport Feasibility Study*.

TABLE 2
Trip Generating Potential – Comparison of Core Strategy Proposed Modifications policy “allocations” and Transport Feasibility Study

Site	Transport Feasibility Study						SRN identified as a "critical"	Core Strategy Proposed Modifications (applying HA generic rates)						Change	
	Morning Peak (0800-0900)			Evening Peak (1700-1800)				Morning Peak (0800-0900)			Evening Peak (1700-1800)			AM Peak	PM Peak
	Arrivals	Departures	2-way	Arrivals	Departures	2-way		Arrivals	Departures	2-way	Arrivals	Departures	2-way		
Bank Lane, Kirkby	21	57	78	56	28	84	M57 Junction 6	31	85	116	79	48	126	38	42
East of Knowsley Industrial and Business Parks, Kirkby	1195	560	1755	313	1013	1325	-	98	33	131	19	83	102	-1624	-1223
Knowsley lane, Huyton	2037	605	2642	492	1677	2170	M57 Junction 2	440	104	544	88	387	475	-2098	-1695
Edenhurst Avenue	10	27	37	27	13	40	-	13	35	48	33	20	52	11	12
Land bounded by A58, Prescot	37	99	136	97	49	146	M57 Junction 2	20	55	74	51	31	81	-62	-65
Carr Lane, Prescot	499	92	502	80	341	420	M57 Junction 2	11	30	41	28	17	45	-461	-375
East of Halewood	160	431	591	425	214	639	-	169	461	629	427	259	686	38	47
South of Whiston	211	569	780	561	283	844	M57 / M62 interchange	225	616	842	571	346	917	62	73
Land South of M62 (employment and country park)	3681	1725	5405	963	3319	4081	M57 / M62 interchange	126	64	189	53	116	169	-4095	-3183
	7851	4165	11926	3014	6937	9749		1133	1483	2616	1348	1306	2654	-8189	-6367

Notes:
 Information in Table 4.3 of study report

Notes:
 HA generic rates as follows:

Land Use	AM		PM	
	Arrivals	Departures	Arrivals	Departures
Residential per dwelling	0.15	0.41	0.38	0.23
B1 per hectare	26.61	4.1	3.28	22.85
B2 per hectare	13.61	4.62	2.59	11.53
B8 per hectare	5.58	2.83	2.34	5.17

Colour Key:
 Increase (Red)
 Decrease (Green)

While it can be seen that the *Transport Feasibility Study* assessed a level of trip generating potential greater than the Agency currently envisages, the following issues remain:

- The concerns in relation to the approach adopted within the *Transport Feasibility Study* identified in early 2013 remain.
- Allied with the above, it is noted that the *Transport Feasibility Study* acknowledges possible critical junctions which would need improvement should the developments proceed. However it is noted that no such direct consideration was given to the strategic road network and subsequently no specific mention of the strategic road network is made in the core strategy or the SUE policies specifically.
- There is argument that evidence specifically relating to the current version of the plan should be prepared to enable a view to be taken in relation to the transport influences of the allocations and any measures required to support the development aspirations.
- This issue extends to the Infrastructure Delivery Plan – the latest version of which that the Agency has access to being that from November 2012 which makes no reference to the SUE sites.

The Agency considers that there is an evidence base basis for the transport policies contained within the Core Strategy and that there are a number of policy provisions that will ensure that detailed consideration is given to the strategic road network during subsequent stages of the planning process, including:

- Policy CS 7 Transport Networks, specifically:
 - Section 2c states “New development will be required to be ... Where subject to a planning application(s), accompanied (except in the case of smaller scale proposals) by Transport Assessments and / or Travel Plans”.
 - Section 4 states “Developer contributions towards strategic transport schemes and programmes will be sought in accordance with Policy CS 27 ‘Planning and Paying for New Infrastructure’, the Developer Contributions Supplementary Planning Document and/or a Community Infrastructure Levy Charging Schedule”.
- Policy CS 27 and its various provisions.
- The provisions of the *Ensuring A Choice of Travel SPD*.
- The new SUE policies (specifically SUE2, SUE2a, SUE2b and SUE2c) SPD and the stated requirements of the SUE sites.

On this basis, it is considered that, when considering the transport implications of the SUE sites in future relevant SPDs, the Agency wish to be fully involved in the extent of analysis and advise that the data provided by the *Transport Feasibility Study* should not be relied upon and revised analysis should be undertaken. These should include full and accurate representations of the potential locations of influence at the strategic road network and any supporting measures required to support specific developments. The Agency looks forward to providing their support and comments for the future SUE SPDs, particularly in relation to development trip impacts on the SRN.

With a view to strengthening this position, the Agency requires that a revision to the wording is made within the collection of the SUE policies and Table 3 sets out a schedule of these required changes.

TABLE 3
Highways Agency required revised wording

Policy	Element	Recommended wording change
SUE2: Sustainable Urban Extensions – Development Principles	1g)	Add to the end of the existing wording “... including considering the impact of development on the strategic road network and identifying appropriate supporting measures.”
	3	Add to the end of the existing wording “... including at the strategic road network.”
SUE2a: Sustainable Urban Extension – Knowsley Lane, Huyton	3a)	Add to the end of the existing wording “... and measures to ensure the safe and efficient operation of the strategic road network at M57 Junction 2.”
SUE2b: Sustainable Urban Extension – East of Halewood	2a)	Add to the end of the existing wording “... and measures to ensure the safe and efficient operation of the strategic road network.”
SUE2c: Sustainable Urban Extension – South of Whiston and Land South of M62	2a)	Add to the end of the existing wording “... and measures to ensure the safe and efficient operation of the strategic road network at The M62 / M57 Tarbock Interchange.”

The information provided in this cover letter should be read in conjunction with the supporting *representation form*.

Comments on other modified policies

Many of the modifications to other policies within the document are reflective of the change in approach to the SUEs. As such, specific comments on those elements are considered to be covered by the comments made above and in the attached representation form relating to the new SUE policies. The comments made in Table 4 are not subject to a representation form but which the Agency would wish to raise.

TABLE 4
Comments on other modified policies

Modification Reference	Policy	Element	Highways Agency Comment
M067	CS 4	Additional text in section 5	The Agency wishes to express its support of the addition to this additional text stating preference towards accessible sites well connected with the town centre. By promoting such connectivity this encourages the use of public transport whilst reducing the reliance on the private car and use of the strategic road network.
M239	CS 27	Additional text in paragraph	The Agency supports the addition to this paragraph in regards to the updates and revision of the Infrastructure Delivery Plan (IDP) being made open to

Modification Reference	Policy	Element	Highways Agency Comment
		10.9	public consultation. As the strategic road network and highways network have considerable importance within the IDP and to future developments, the Agency will take particular interest of the opportunity to review any updates.
M240	CS 27	New paragraph 10.10A	The Agency would like to express its support of the addition to the Core Strategy detailing the need for new development proposals to have regard to the content of the IDP. The Agency requests to highlight the importance of the highways network and strategic road network within the IDP.

Sustainable Urban Extensions Supplementary Planning Documents

Our understanding is that the Supplementary Planning Documents (SPDs) for the SUE sites are yet to be written and are currently open to surveys. These surveys appear to be aimed at residents and local businesses rather than strategic organisations such as the Highways Agency, and as such a survey response has not been made at this time. However, given the scale and nature of these strategic sites and the reliance on the SPDs (resulting from the above response to the SUE polices) in providing appropriate guidance to a range of matters including transport, the Agency would wish to be fully involved in their preparation and will offer intelligence to support their development.

I trust this response is helpful; however should you require any further information, please do not hesitate to contact me and I look forward to receiving confirmation that our comments have been received in due course.

Yours sincerely



David Dickinson
 NDD North West Asset Development Team
 Email: [REDACTED]

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Dave Dickinson	
Job Title (if appropriate)	Asset Manager	
Organisation (if appropriate)	Highways Agency	
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	[REDACTED]	

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
a) Legally Compliant? (see guidance note 2.2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Sound? (see guidance note 2.3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Highways Agency makes specific comment on the addition of the SUE policies to the Core Strategy. Detailed comment in relation to the additional policies is contained in the cover letter dated 12 November 2014, with the following summarising the position of the Agency:

- The change in nature of these sites from “reserved” and “safeguarded” to “allocations” in the core strategy necessitates the need for the Agency to make comments at this time.
- It is assumed that the transport evidence base being relied upon remains to be the *Transport Feasibility Study* (the study). With regard to this, the Agency notes:
 - The study was prepared some time ago - since then, some of the SUE sites have changed in development content and scale.
 - The study did not offer specific information in relation to the implications of the plan on the strategic road network. The Agency made comments on the study at an early stage and it is not believed that these issues have been addressed.
 - The study is likely to have considered a quantum of development (and trip generating potential) greater than likely to arise through that identified in the Core Strategy. However, there is argument that evidence specific to the current version of the plan should be prepared to identify impacts and required supporting measures. This matter extends to the status of the Infrastructure Delivery Plan.
- However, the Agency considers that there is an evidence base and a number of policy provisions, outlined in the cover letter, that give the Agency the comfort that such matters can be dealt with in due course. This position should be strengthened with a revision to the wording of the SUE policies as specified in Table 3 of the cover letter.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

As identified above, the Agency is not objecting to the modification of the plan. However the addition of the SUE policies to the document identifying the sites as “allocations” presents a significant change as to how these sites would previously have been designated as “reserved” and “safeguarded”.

While the Agency has reached the conclusion of not finding the plan “unsound”, this is done so on the basis that a number of policy provisions give the Agency the comfort that such matters can be dealt with in due course.

In order to support and strengthen this position, the Agency suggests that revised wording is made within the collection of SUE policies, as specified in Table 3 of the cover letter, to ensure the strategic road network issues are fully considered.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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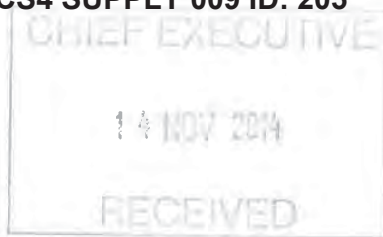
Signature



David Dickinson

Date 12 November 2014

**Knowsley Local Plan: Core Strategy
Proposed Modifications - Consultation
Representations Form**



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	David Holmes	
Job Title (if appropriate)	Designer / Lecturer	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

David Holmes

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS14

Policy Ref

E8

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

- There is a need to conserve and enhance the natural environment recognising the importance of biodiversity in the creation of good/ better air quality.

- “The re-use of land should be promoted to minimise the take-up of greenfield land. Source: Sustainability issues were derived from the baseline data gathered in 2008 – 2009 to inform the SA SD07 Scoping Report, Knowsley council

I have read with great interest your previous reports on the air quality in the Whiston area and the information below will be of interest as it states how poor the air quality was then the interchange was developed and yet, now the Council wishes to proceed with another development bringing in yet one or two vehicles per household!

- ‘The main sources of air pollution in Knowsley, as identified from previous air quality review and assessments and the work carried out in the Merseyside Atmospheric Emissions Inventory are from road traffic vehicle emissions and from industrial sources. The junction of the M62 with the M57 at Tarbock Island was identified as a major congestion hotspot particularly at rush hour periods. In 2008 Tarbock Island interchange was re-aligned in order to improve traffic flow through the junction. Since the work was undertaken congestion levels at this junction have significantly reduced.’ Source:

<https://www.whatdotheyknow.com/request/172011/response/426551/attach/3/Knowsley%20MBC%20Progress%20Report%202013.pdf>

Is this not merely robbing Peter to Pay Paul?

Your answers are most welcome.

If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- My recommendation is to use up Brownfield sites as a matter of urgency to deter the absolute necessity of the greenbelt land as it is needed for better air quality for the residents of Whiston South, Prescott and Rainhill. Building any development on this land will have an enormous and detrimental effect on air, wildlife and soil quality.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

13 Nov 14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	David Holmes	
Job Title (if appropriate)	Designer / Lecturer	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS14

Policy Ref

E2

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I believe that the proposed 'appropriate measures to mitigate the impact of development' such as a buffer zone around the LWSs and areas of woodland are not sufficient to protect the habitat and will remove the 'hunting ground' and foraging areas used by the wildlife. Many animals and birds rely on the farming system for their survival.

I regularly spot buzzards and kestrels hovering above the farmland and fields of wheat, where will they go when such a large area of greenbelt is covered with concrete and housing. The additional number of people within close proximity of the LWSs and habitats will endanger such species as the red listed Grey Partridge. The habitats will be fragmented as islands of green land and woodlands surrounded by concrete sprawl leading to no ecological dispersal and colonization, or allow movement or growth in the wildlife and plant population.

Ecological dispersal and colonization of protected and endangered species will be prevented via fragmentation of vital habitat networks; inadequate dispersal of species will cause a local and regional extinction of nationally significant and endangered species. (Harrison and Bruna, 1999)

The woodland is ancient woodland that has taken many, many years to grow, to assume that this would not be effected by placing a buffer zone around it is more than naïve. The risk of vandalism will increase, fly tipping will increase and anti-social behaviour will have detrimental effects on wildlife and habitat. Additionally, species covered by the North Merseyside Biodiversity Action Plan such as Skylark, Grey Partridge, Lapwing and Brown Hare are found here

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

A highly detailed and extensive survey in terms of duration should be carried out by independent parties and their findings published and considered before further decisions are made to the use of greenbelt for development.

Had a full ecological and habitat survey been undertaken by KMBC it would have established, in summary, that the urban fringe woodland of Old Wood and Big Water, and supportive agricultural land, all within the green belt of South Whiston, was essential to the conservation of the abundance of wildlife and thus their sustainable future.

Reconsider the use of brownfield sites before greenbelt land is even considered.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

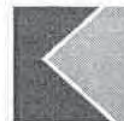
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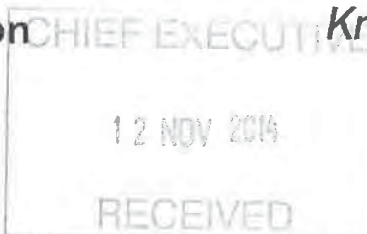
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Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	DAVID KENT	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

SUE 2A

Policy Ref

K9B514

Paragraph Ref

E3/E5

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I THINK ALL BROWNFIELD SHOULD BE USED BEFORE ANY GREENBELT WHISTON IS A VILLAGE WHICH WILL BE DESTROYED. THIS PROJECT WILL BRING IN AN UN-NEEDED 6000 PEOPLE AND APPROX 2000 CARS BRINGING POLLUTION AND OVERCROWDING OF A SMALL VILLAGE. THERE ARE NO JOBS AND THIS PROJECT WILL BRING NONE THE MOBILE HOME SITE WILL BE SURROUNDED BY HOUSES AND UNWANTED OR NEEDED POLLUTION AND BECOME A SHORTCUT ACROSS AN ESTATE. THERE ARE NOT ENOUGH SCHOOL PARKS FOR THE EXTRA CHILDREN. DR'S ARE CROWDED. THE HOSPITAL HAS PROBLEMS AT WEEKENDS AS IT IS. PEOPLE WILL COME TO THE AREA FOR THE GREEN SPACE AND THE WILD LIFE. SADLY THIS PROJECT WILL TAKE AWAY WHAT PEOPLE WOULD COME FOR. DEFEATING THE NEED TO BUILD ON GREENBELT

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

STOP BUILDING.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

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Signature



Date

1/11/14

David Kernick



Local Plan Team
Knowsley Council
First Floor Annexe
Municipal Buildings
Archway Road
L36 9YU

Tuesday 12 November 2014

Dear Knowsley Local Plan Team,

I am a resident of Whiston, an active member of my local community, and editor of Prescott and Whiston's only dedicated media outlet, Prescott Online. As such, I not only have my own views, but I hear every day the views of ordinary people from the area. The representation below reflects both.

I would like to object to modifications to the Local Plan, in regard to the release of greenbelt land in South Whiston (KGBS 14).

While the proposal to remove protected status is problematic enough in itself, that this could be brought forward by several years is much greater cause for concern; if it is doubtful the area could cope with such change at all, it is even more doubtful that it could cope in so short a time-frame.

INFRASTRUCTURE

I am very concerned about the impact the proposals will have on **traffic and roads** in Whiston. Tarbock Island is already pushed *beyond* its limits every day, especially at peak times. As well as increased congestion in the immediate area of the junction, the flow of traffic through the rest of Whiston would increase, posing a danger to residents on the main thoroughfare, namely Dragon Lane, Dragon Drive and Windy Arbor Road. Though these are primarily residential areas, they are already subject to significant traffic, with the A57 and Whiston Hospital at one end and the motorways at the other.

Population growth also means more strain on public resources, including the **NHS and schools**. How will they cope with more people to serve, especially as austerity makes more funding cuts inevitable in the next few years?

JOBS

Where will new residents work? Many residents already have to commute outside the area (and outside the borough) to find work suited to their skills and earning

power. As well as the obvious question of where jobs will come from, more commuters again means more pressure on roads.

IMPORTANCE OF GREEN SPACE

Much of the greenbelt being proposed for development has served generations of ordinary Whistonians and their families as space for **recreation and leisure**. The fields on the corner of Windy Arbor Road and Lickers Lane, for example, are used for sports. The two lakes at Halsnead Park (known locally as 'Big Lake' and 'Little Lake') are popular areas for people of all ages, for activities such as walking and fishing.

This benefit to the community cannot be underestimated; having lived in Whiston on and off for over twenty years, I consider the amount of green space for walking and appreciating the natural environment one of the most attractive and beneficial aspects of the town. I regularly walk through the area, both on my own and with friends and family, including children. Loss of greenbelt means loss of health and wellbeing, both physical and emotional.

Related to that is the impact development will have on **the environment and wildlife** in Whiston. This space acts as 'green lungs' in an increasingly urbanised area, and therefore its development decreases quality of living for both humans and animals. As editor of Prescott Online, I actively encourage local interest in nature and the environment with a regular column, 'Our Patch,' written by Whiston resident SJ Jarman. In it, she documents the wildlife she finds on her walks with her family around Whiston's wild areas, including much of the space now being proposed for removal.

Our Whiston Library (of which I was Chair from 2013 to 2014) has recently been in negotiations with Mersey Forest and the Forestry Commission to set up learning centres in Whiston. Their interest is precisely because they were attracted to Whiston's vast green space and opportunities for learning about the environment. To my knowledge, these negotiations are ongoing.

BROWNFIELD

Lastly, Knowsley Council have stated clearly that there is **more than enough brownfield** in the borough for required housing developments. The modifications to the Local Plan suggest greenbelt must be considered because brownfield sites are not becoming available fast enough, but this is hasty – a short-term gain for something that will have a long-term negative effect. Knowsley Council should explore more ways to hasten brownfield development rather than sacrificing valuable greenbelt.

In summary, releasing Whiston's greenbelt will be to the long-term detriment of the health and wellbeing of Whiston residents, both socially and individually, and the current infrastructure cannot support the proposed development; there is no sign of any action to improve infrastructure significantly to make this possible, and the

current economic situation suggests public funding will only decrease. Moreover, if population growth is inevitable, brownfield development is a far better solution, and deserving of more exploration.

Yours sincerely,

David Kernick



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS DEBBIE KING, MRS	
Name	SUSAN BLONG, MR. PETER BLONG	
Job Title (if appropriate)	RIDING SCHOOL PROPRIETORS	
Organisation (if appropriate)	LODGE RIDING CENTRE	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation Lodge Riding Centre

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref M076 to M091 Policy Ref CS5 Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Given the latest figures available (April 2012) for empty homes in Knowsley being 2020 and SHLAA (2012) identifying enough land in urban/brownfield sites in Knowsley to build another 5636 why do we need to release areas of Greenbelt to build a similar amount ie 7000 to 8100, the figure Knowsley Council project to be needed by 2028?

CS5 talks about Inappropriate Development – surely taking away the Greenbelt to build more houses (a lot more houses than needed if we used brownfield sites) is very inappropriate

Harm to the Greenbelt (NPPF 87/88) is very difficult to quantify especially when you cannot be sure that areas in question will be used?

Continue on a separate sheet if necessary...

If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Only release Greenbelt ^{if and} when there are no alternatives.
It should be as a last resort not just developers taking the easiest cheapest option available.

As a business that is expected to operate in a rural setting ie horses, fields etc an increasing pressure is put on us (Lodge Riding Centre) and other rural businesses eg farming to operate. If we carry on as we are now there will be no riding schools, no farms etc as no more Greenbelt land is being brought forward. We need to look after what little is left!

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 12/11/14

From: Debbie Lewis [REDACTED]
Sent: 13 November 2014 15:54
To: Knowsley Local Plan
Subject: For the attention of Mr. Martin Pike

Follow Up Flag: Follow up
Flag Status: Flagged

re: Knowsley Local Plan (KGBS 14)

Dear Mr.Pike,

I strongly oppose Knowsley Council's plan to allow building on greenbelt land in Whiston South. I would like the following points to be considered -

* Knowsley Council have over-estimated the number of houses needed to be built in the next 5 years.They tell us that the houses are needed because the population is going to increase however Knowsley's population has been decreasing for the last 50 years. Lisa Harris tells us that Knowsley Council wish to bring new people to the area. Claiming that the houses are needed to fulfill expected demand and then claiming the the houses are needed to encourage people to move to the area is utterly ridiculous. There seems to be a lot of contradiction in their explanation of why we 'need' so many houses.

*Government guidelines released 6th October, 2014 state that greenbelt land should only be used for development 'in exceptional circumstances'. I see no exceptional circumstances to justify destroying the greenbelt land in Whiston South. Knowsley Council tell us that they would prefer brownfield sites to be used first but that you, Mr.Pike, are insisting that greenbelt sites should be used. Understandably, residents are confused as to who is responsible for the threat to our greenbelt.

*The area in Whiston which is currently protected by greenbelt includes agricultural land, ancient woods, a few small lakes and a small area of recreational land. This little patch of 'countryside' means so much to local people. It provides a barrier from the traffic pollution of the M62 with trees protecting us from carbon-dioxide. It is a peaceful place that we can walk to when the stresses of everyday life in a deprived area get too much. It is a place of learning were we take our children to see nature up close. My mother regularly took us for walks down to 'Biggy' (Big Water), I take my children there and show them what a Beech tree looks like, what an Oak tree looks like.... Where will my grandchildren go to see these things? Whiston doesn't even have a library anymore. Why fill a deprived area with more houses, mores roads, more traffic and give people nothing but the suggestion of 'some open spaces' included in developments?

*The greenbelt area in Whiston includes some areas of 'environmental interest' (we would argue that the whole greenbelt area is of environmental interest). These areas, such as the ancient woodlands, have protection over and above greenbelt but how protected will the wildlife and habitats be with such a large, construction development going on around them? The Local Plan states that it will have a 'negative impact' . Jonathan Clarke has already told us that some wildlife and habitats are 'more important than others'. Personally, I believe all wildlife is important. To concrete over this beautiful area when there are brownfield sites going to waste would be an absolute abomination.

*Traffic in Whiston is already a problem. A minimum of 1500 new houses shoved into the area will obviously greatly increase the amount of traffic and air pollution. Knowsley Council tell us this won't have a significant impact..... We believe it certainly will!

*Whiston Town Council collectively oppose these plans.

*Shaun Woodward MP (St.Helens and Whiston South) and Marie Rimmer strongly oppose these plans and have written to Jonathan Clarke to tell him their views (I trust their emails will be forwarded to you).

*Over 3,000 people have signed a petition objecting to these plans

*Hundreds of local residents have attended 'consultations' and meetings (Most of them having heard about the issue from campaigning volunteers NOT Knowsley Council)

Mr.Pike, I cannot stress to you enough the strength of feeling in my community. Please do everything you can to SAVE WHISTON'S GREENBELT.

Mrs. Deborah Lewis

From: Dennis Jones [REDACTED]
Sent: 13 November 2014 14:47
To: Knowsley Local Plan
Subject: Whiston Greenbelt

Follow Up Flag: Follow up
Flag Status: Flagged

I have lived in Whiston all my life since 1952. This proposal appals me, we live in a mainly built up area and this stretch of countryside gives you an uplifting feeling everytime you walk, cycle or even drive through it. I cannot imagine my life without the feeling I can take a walk through it ever again. I was heartbroken when the Lickers Lane estate was built many years ago and now this? Where we will go for a nice walk in peace? These fast disappearing areas are very special to us especially in this area of the country and county where we don't have as many nice areas to enjoy, just depressing housing estate after housing estate, retail parks, ugly industrial parks.

This area needs its greenbelt for the sanity and wellbeing of all the people who live here. We should be proud of it, look after it, Cherish it, Build elsewhere on brown sites. Knock down the useless empty work units. Build luxury high rises on brownfield sites save space, Save the greenbelt please

--
Regs Dennis Jones

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

RECEIVED

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	DEREK MUIRHEAD	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

MR. DEREK MUIRHEAD

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

WAHISTON
SOUTH

Policy Ref

LGBS 14

Paragraph Ref

E1 - E11
S1 - S8

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I STRONGLY OBJECT TO THE PLAN TO BUILD A MINIMUM OF 1503 PROPERTIES ON THE GREEN BELT OF SOUTH WAHISTON I DREAD THE VERY NEGATIVE IMPACT OUR OUR PRECIOUS LOCAL ENVIRONMENT CONSEQUENT TO ERADICATION OF TREES, SHRUBS, WILDLIFE. THESE FEATURES OF OUR ENVIRONMENT ARE VITAL TO HEALTH AND WELL BEING. POOR ENVIRONMENTAL CIRCUMSTANCES CAUSE STRESS, ISOLATION, POVERTY, DETERIORATION IN HEALTH, ~~INCREASED~~ DEPENDENCY ON SOCIAL BENEFITS.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

• THE USE OF BROWNFIELD SITES WOULD GREATLY IMPROVE ^{THE} SITE STATE OF OUR LOCALITY, RELEASE VALUABLE LAND FOR PUBLIC USE AND PROTECTION, PROVIDE VALUABLE INCOME AND OPPORTUNITIES FOR NEW BUSINESS DEVELOPMENT.

→ RESTORING EMPTY AND VERY RUN DOWN PROPERTIES ON STRUCTURALLY SOUND LAND WOULD CONTRIBUTE TO THE WEALTH, HEALTH AND WELLBEING OF RESIDENTS.

• CONSULTATION WIDELY TO DETERMINE NEEDS, REQUIREMENTS AND INFORMATION

Continue on a separate sheet if necessary...

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5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature  Date 01 - 11 - 14



Local Plan Team
Knowsley MBC
1st Floor Annexe
Municipal Buildings
Archway Road
Liverpool
L36 9YU

Mr Edward Bean



Date: 27 October 2014

Tel; [REDACTED]

Dear Sir/Madam

**Re: Knowsley Local Plan: Core Strategy
Proposed Modifications- Consultation**

Please find the enclosed representation form for the above.
Deadline for receipt is 12 noon on 14 November 2014.

Yours



Edward Bean



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	EDWARD BEAN.	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

EDWARD BEAN. (LANDOWNER)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M064

Policy Ref

CS4

Paragraph Ref

46.

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The reasons for the Text of this schedule of modifications June 2014 is to : ensure consistency with main modifications to Policy CS5 and the introduction of site allocations for locations of Green Belt release via Policy SUE 1. Land at Shrops farm was considered for release, and rejected on the basis of flawed and inconsistent evidence - REF RC05 letter dated 09 June 2014. Council have approved the release of land in Green Belt. 2014. Bank Lane Kirkby for housing. This arbitrary approach renders the plan. Unsound and unfair.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Recognise the description of Shrogs farm in KLPCS Greenbelt Technical Report July 2013: "not related to existing Green Belt Boundary." Uphold view of land by Capita Symonds Vol. 1 Strategic Flood Risk Assessment Oct 2012 "not susceptible to groundwater flooding" 97% of site is suitable for less vulnerable developments. This is an indication - evidence based - that the land could assist the delivery of large scale distribution, logistics in M064. 46. "Land at Shrogs farm to be included in the sites" identified in Policy SUE 1 to help meet the needs in paragraph 3 of Policy Text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
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Signature


EDWARD J. BOAN

Date 27 OCTOBER 2014.



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MS	
Name	ELAINE HANLEY	
Job Title (if appropriate)	NURSE	
Organisation (if appropriate)	-	
Postal Address ▲		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Social,
economic, environment,

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

WH1510N ST4

Policy Ref

KGBS 14

Paragraph Ref

~~1~~ E2

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I wish to object to the proposal of development in Whiston green belt area, due to the declining habitat of wild life, eg. British HoneyBee and relation to invertebrate conservation, particularly species of butterfly that travel inter-borough. Research by Professor Emeritus John Handley, OBE, University of Manchester clearly demonstrates the importance of the 'M62 Greenbelt gateway'.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

The brownfield sites should be considered and used before greenbelt ~~is~~ ^{is spoilt} ^{development} by unnecessary and unwanted ^{development} by the Community of Ulister.

The community of Ulister already has problems with the decrease of wildlife.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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Signature



Date 1.11.2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	EUSTA MUIRHEAD	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

MRS. ELESTA MUIRHEAD

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

WHINSTON
SOUTH

Policy Ref

KG65 14

Paragraph Ref

E1 - E11
S1 - S8

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I strongly object to the plan to build a minimum of 1503 properties on the greenbelt of South Winstan. I am extremely concerned about the negative impact on our local environment consequent to eradication and total destruction of our wildlife and natural resources which are so vital to health and well being. Poor environmental conditions do cause stress, isolation, ill health, poverty with subsequent increase in dependence on social benefits.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I consider that further consultation, wise reference to historical changes in other societies/localities which were changed at whim and destroyed subsequently.

I think that Brownfield sites should be developed to release apparently useless land for the very purposes that Greenbelt land is being destroyed. If the ancient environment is improved, we would see the beneficial impact on health, ~~and~~ education, wealth, social status, universal benefits.

Restore Empty and rundown properties for use.

Continue on a separate sheet if necessary...

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5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature

Date

01/11/14

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	Mr & Mrs S. H. H. H. H. H.	
Job Title (if appropriate)	Retired	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

IC STRATHKENSON

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

85B14

Policy Ref

K9B14

Paragraph Ref

E23

2. Do you consider that the proposed modification is ? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Wickrow village shopping Area. & surrounding Area.
are not used to TO, THESE VARIOUS OUTLETS
if more outlets are created than local stores.
would vanish!
" Employment opportunities for local people. A
restriction are not estimated. as all jobs have to go
out for tender? leading to various builders
development funds coming in. much than used
local trades persons. as stated in DOCK 85B14
SA. 013. E23.
worry like may. prospective & possible scene in
the Core Strat Plan. with not quite the best em.
jobs will be created!

Continue on a separate sheet if necessary

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

No To Building A Green Belt.
Plenty of Brown Land. in
the surrounding Area To Build
Houses.

Continue on a separate sheet if necessary

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy** **and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing?** (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Si

Date

1/11/2014

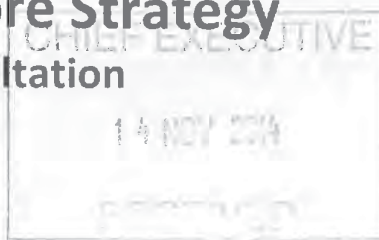


Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	
Name	FRANCES PARRY	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation FRANES PARBY

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref AD51 Policy Ref HGBS14 Paragraph Ref
land south of 62

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

OBJECTION
NOT POSITIVELY PREPARED
Supposedly based on assessed needs of the area.
But councillors admitted they do not really know
how many houses will be build. Nor where
the people will come from to fill the houses.
Not looked at how it will affect surrounding
areas e.g traffic, schools, doctors, hospital etc
NOT JUSTIFIED
Local communities not sufficiently targeted.
Many people still have no idea it is going on.
Many information brochures were not received
by house holds - Jonathan Clark aware of this.
People can't object if they don't know about it

Continue on a separate sheet if necessary...

you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Use brown land first then think of greenbelt land when there is no alternative

Continue on a separate sheet if necessary...

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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature 

Date 12/11/14

FRANCES PARTY

Not justified could.

- o Use of greenbelt not the most appropriate strategy as there are enough brown field sites in the area. These should be used first before green belt is considered.
- o social environment will be changed dramatically by changes. (Schools, doctors) economic environment - very few jobs in the area and not enough planned to stop people moving in without jobs.
Resources - very few available to people already in the area. Schools, doctors are full. Hospital will struggle with influx of people. Transport not up to influx. Road system bad.

NOT EFFECTIVE

- o Not enough planning gone into what will be put in place for infrastructure of the area. Very little detail available.
- o Councillors not aware of who or what is involved in the building of houses or amenities. No body seems aware of time scale. No one named to overlook it
- o The plan is the main reason why there will be major changes in the area and as such will generate more changes and needs. No formal review planned

FRANCES PARRY

Not consistent with national policy

- o Green belt should only be used in exceptional circumstances when all brown land has been utilised. Lisa Harris (Councillor) says there is enough brown land available.
- o Developers are deciding what is to be built - not councillors e.g. how many houses 30-40 per hectare? 150's?
- o Community misled on numbers. Councillors said 1503 but later admitted they don't know how many as developers will decide. Nos are seen now as guidance.
- o Plan undermining local democracy. First plan - using brown land - put forwarded rejected by government minister - Councillors told to plan for green belt. Most councillors are against this plan as are both MPs for the area.



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

RETURNING THIS FORM

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- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	Francis Moore.	
Job Title (if appropriate)	Personal Trainer.	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I Am a qualified Football Coach and personal trainer. The loss of the greenbelt land will affect the whole community who regularly use the open spaces of whiston for sport and recreation. The land is fully utilised and is not derelict. There are other areas of land in the area which have been used before. These are smaller areas but could house the local community. These Brown belt sites have not been developed for a number of years. These sites should be fully utilised. The business parks stand empty with empty land and units.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

The plan has not been positively prepared as it does not take into account the Communities wishes. The Plan is not justified as the population in Knowsley has decreased and there is no justification for an estate of this size to satisfy the needs of the community affected by it.

The plan will not be effective in making the community a better place to live as the proposed use of our greenbelt is detrimental to the community.

The plan is not consistent with national policy as the governments own guidelines state that the use of greenbelt land should be a last resort and there is sufficient brownbelt land to meet the needs of the community. Continue on a separate sheet if necessary... Inspector must say No.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



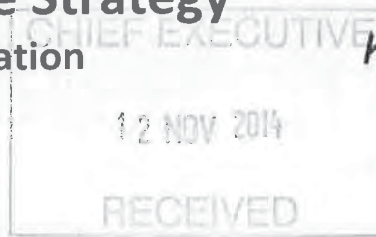
Date 3/10/2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title		
Name	Ian Banawich	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The use of brownsite's, sites where empty shops-units-house's already exist.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Whiston is already struggling with the number of people who use it's services - (schools/hospitals etc) It does not make sand sense to increase the population. The roads are unable to cope with current levels of traffic let alone with more cars. little thought seems to be given to the development of 'brown sites' as whiston has several developments where empty business/houses are still available -

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1. 11. 14

[REDACTED]

From: IAN HOLLAND [REDACTED]
Sent: 26 October 2014 07:48
To: Knowsley Local Plan
Subject: Greenbelt

Follow Up Flag: Follow up
Flag Status: Flagged

I would like to register my strong opposition to the proposed selling off, of the greenbelt between Whiston and Cronton. I have lived in Knowsley for the last 10 years and always been quick to praise the council for their defence and protection of the greenbelt. Now it seems you are no better than Halton, St Helens and the other local councils who have sold off their greenbelt to property developers for a quick buck. This is an area of natural beauty and should remain so, go and develop the brown field sites if you must but leave our greenbelt alone.

Ian & Christine Holland

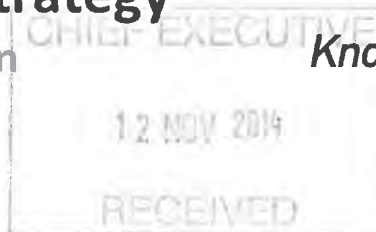
[REDACTED]



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Mrs Irene Davis MRS IRENE DAVIS	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Please see attached sheets in support of my view that the plan is not sound due to conflicts and is not legal because it doesn't take into account latest Government advice. It is also using out of date information; population projections from the ONS and an out of date Transport assessment
SEE COMMENTS IN RED.

Continue on a separate sheet if necessary...

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

It is also using out of date information; population projections from the ONS and an out of date Transport assessment. The council should carry out a new Transport assessment and a new Population projection. Also, protect green belt and use Brown field sites which would supply enough housing by their own admissions.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

25/10/14

KNOWSLEY LOCAL PLAN: CORE STRATEGY

Submission and Objections regarding proposed modifications

P R Davis
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

Implications for South Whiston and Prescott Town Centre – Please see my comments highlighted

3.20 The appraisal concluded that the Spatial Strategy for Knowsley is likely to have a largely positive impact on the sustainability objectives. In Particular, it is envisaged that the Development Principles (CS2) are likely to have a major positive impact in the long-term on the objectives relating to health; mitigating climate change; and reducing the need to travel. It was concluded that the policies for Housing Supply (CS3), the Economy and Employment (CS4) and Town Centres and Retail (CS6) would have a positive impact on a range of objectives, particularly those that relate to social and economic issues and the appraisal also predicted that the policy for Green Infrastructure (CS8) would have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; adapting to climate change; and green infrastructure.

I would question how removing green belt can have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; and adapting to climate change.

3.21 The appraisal of the Proposed Submission document did however consider that a number of the policies would have an uncertain or negative impact on some of the objectives. For instance, it concluded that a number of the policies, such as the Spatial Strategy (CS1) and Green Belt (CS5) could have an uncertain impact on a number of environmental objectives in the longer term due to the potential for it to result in the release of a number of sites in the Green Belt.

How can this statement hold true to statement at 3.20 one is negative and one positive?

3.23 Nevertheless, the appraisal of the Proposed Submission document acknowledged that as each of the policies would result in built development and would therefore lead to some carbon emissions associated with the construction and operation of this development, their impact on the objective relating to mitigating climate change is uncertain. It also considered that there is some uncertainty over the impact of the policy for Knowsley Industrial and Business Parks (CS11) on the objectives relating to air quality and need to travel, particularly as there is limited information available on the amount and nature of the new employment uses that would be delivered. In addition, due to

both policies resulting in the provision of B1 office development in an out of centre location, the impact of the policies for Knowsley Industrial and Business Parks (CS11) and South Prescott (CS13) on the objective relating to the vitality and viability of Knowsley's town centres was also deemed to be uncertain.

The actions contained within the Local plan are identified here as uncertain and would certainly fail in meeting our green credentials as the development of green belt out of centre would increase the carbon impact.

3.24 On the whole, the appraisal of the Proposed Submission document concluded that the Thematic Policies performed well in the SA process. In particular, the policies relating to housing and the accommodation needs of the community (CS 15 – CS18) were considered to all have a positive impact on the objectives relating to poverty and deprivation; health and the provision of good quality housing; the policies relating to Sustainable and Low Carbon development (CS22) and Renewable and Low Carbon Infrastructure (CS23) were considered to have a major positive impact on the objective relating to mitigating climate change; and the policy for Greenspaces and Trees (CS21) was considered to have a major positive impact on the objectives relating to landscapes; biodiversity; adapting to climate change; and green infrastructure.

How can this point be made as positive when the document already highlights the possibility of a negative impact on all of the CS range of reports?

Proposed Modifications to the Submission Local Plan

3.26 The initial Local Plan Examination hearing sessions took place in November 2013. Following these hearing sessions, the Inspector appointed to undertake the examination issued his interim findings in January 2014. In response to these findings, and also to reflect other required amendments, the Council proposed a number of modifications to the Plan. These modifications included a revised approach to the release of Sustainable Urban Extensions, a reduction in the employment land target for the plan period, a reduced target level of affordable housing provision on sites in the urban area and the prioritisation of different forms of developer contributions in instances where viability is insufficient to fund all the non-mandatory requirements set out in the Plan.

The reduced level of affordable housing can only be in the favour of developers, government guidelines call for a level of 25%. A reduced level of employment land means that the target of job creation must be flawed.

4.10 The scale of any impact on an objective has been predicted taking into account the size of the site and the quantum of development it is likely to accommodate. In relation to housing sites, where an approximate number of dwellings that could be accommodated on a site have not been provided by the promoter of the site, its yield has been estimated based on the standard multipliers used for assessing the capacity of sites within the Strategic Housing Land Availability Assessment

(SHLAA) and the Green Belt Study. For sites in excess of 2 hectares in site size, this assumed a 75% net developable area and a density of 30 dwellings per hectare¹³.

In the case of South Whiston, 75% of the proposed area of 110.3 hectares minus 27.6 = 82.70 hectares @ 30 dwelling per hectare is 2481 dwellings. The council have only declared 1503 dwellings. This calls all of the council's estimates of housing into question. The proposal to bring forward Green Belt release on such a scale will also produce many more houses than the SHLAA calls for. Also the government has in October 2014 told councils to use the NPPF to protect Green Belt.

“Councils must protect our precious green belt land”

From: [Department for Communities and Local Government](#), [Brandon Lewis MP](#) and [The Rt Hon Eric Pickles MP](#)

First published: 4 October 2014 # Last updated: 6 October 2014

Part of: [Improving the energy efficiency of buildings and using planning to protect the environment](#), [Climate change](#), [Environment](#) and [Planning and building](#)

SUE 2c – Sustainable Urban Extension: South of Whiston and Land South of M62

5.44 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the further modifications to the policy would remove the specific reference to housing in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require the development to provide a wider choice of housing in the area. Consequently, given the substantial capacity of the site, it is considered that the policy has the potential to have a positive impact on the objective of providing good quality housing and this impact would become increasingly significant as the development is built out. The policy also promotes a significant amount of employment development in this location and, due to the scale of development that would be delivered, could also encourage further investment in the area, generate employment and training opportunities in the construction sector and help sustain existing local facilities. As such, the policy could also have a major positive impact on the objectives that relate to business growth and productivity; and reducing unemployment; and some positive effect on the objectives concerned with poverty and deprivation; and education and skills.

Any employment gains in the building industry are short term and will have little impact on local unemployment. With the reduction in affordable housing previously mentioned (3.26) how can the massive scale of over 2400 houses have a beneficial effect, without considerable investment in infrastructure. There are only two local primary schools, I question if they would have the capacity to cope with this massive

development. Already in (3.21 & 3.22) the question of environmental and green space negative impacts have been mentioned, a development on this scale would surely cause a negative impact on all those areas mentioned.

5.45 The policy would also result in residential development being directed to a location that is within reasonably close proximity of established employment areas and a number of local facilities, including primary schools, a GP and health centre and a local shopping centre on Greenes Road. It also requires new development in this location to contribute towards public transport provision and improve links to Whiston railway station. As such, the policy could have a positive impact on the objectives that relate to improving access to services and amenities; and the use of more sustainable transport modes.

Local transport in Whiston is very poor and anyone who is not a car owner and lives on Windy Arbor Road, has already seen a reduction in buses available since de-regulation. To suggest building a large number of houses will increase local transport is naïve in the least and downright misleading. The development by Halton in Cronton has not seen a vast increase in bus traffic and hardly a bus is available late at night. The local shopping centre mentioned is log jammed at busy times with cars and deliveries by Artics to Tesco and the odd truck using Whiston as a short cut from Tarbock island. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.46 Given the scale of development promoted, the policy has the potential to generate a significant amount of additional expenditure which could support nearby local centres. As such, the policy has the potential to have a positive impact on the objective that relates to the vitality and viability of town and local centres. In addition, a key element of the proposals for the site is the creation of a country park with associated footpaths, cycleways and bridleways, and the policy also requires development in this location to encourage walking and cycling and provide public open space. As such, it is considered that the policy could support participation in sport and recreation and could therefore have a positive impact on the objective that relates to health.

Why it is necessary for so much land to be considered for removal from the Green Belt, to the south of the M62. Only about a third of this is reported to be for development. It has been said that the rest will form a Country Park, on the Old Cronton Colliery site. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.47 The policy would however have the potential to have a negative impact on a number of objectives. In particular, it directs development to a greenfield site that contains large areas of Grade 2 Best and Most Versatile agricultural land. As such, the policy would have a major negative impact on the objective that relates to protecting land and soil. Directing development to this location would also have a negative impact on the objective that relates to protecting landscape character;

and could have a negative impact on the objective that relates to biodiversity by resulting in the loss of priority habitat and/or by placing pressure on nearby Local Wildlife Sites. Nevertheless, there is only a low level of certainty about the impact of the policy on this objective.

There is a clear admission here of the negative impact of taking this area out of Green Belt. With the increase in Global commodity prices locally produced food is more important. The need to remove Grade 2 Best and Most Versatile agricultural land from the Green Belt is not proven and 5.47 highlights the negative impact of this policy.

5.48 The policy will result in development taking place in a location that is within reasonably close proximity to local facilities and would also require the development to contribute towards public transport, walking and cycling. However, the construction and operation of this development would inevitably result in carbon emissions and would inevitably generate a significant number of vehicular trips and associated emissions. Consequently, the policy has the potential to have some negative impact on the objectives that relate to mitigating climate change; and protecting air quality.

There is a clear admission within (5.48) that the development proposed is identified as having a negative effect on carbon emissions and would certainly fail in meeting our green responsibilities. The mention of a significant number of vehicular trips bears out our belief that there would be a serious impact on traffic congestion within Whiston.

5.49 The policy would also have an uncertain impact on some of the sustainability objectives. Specifically, the policy would result in development being directed to a location that is in close proximity to a number of heritage assets. Nevertheless, due to the scale of the site, there may be scope to incorporate an adequate buffer around these assets to protect their setting. In addition, the policy requires development in this location to comply with Policy SUE 2 which, amongst other things, requires new development to protect and enhance historic and architectural assets. As such, it is uncertain whether the policy would have a significant impact on the objective that relates to preserving and enhancing Knowsley's built heritage.

These comments can only reinforce the need for a structured approach to any release of Green Belt and more time should be spent understanding all the issues before we take a decision that cannot be revoked.

5.50 Although the policy directs development to a greenfield site which has the potential to function as part of the Borough's Green Infrastructure network, it also involves the creation of a country park and the requirement for development in this location to be subject to a master planning should ensure the appropriate retention and provision of objective that relates to providing and conserving green infrastructure is also considered to be uncertain. Areas of

Green Infrastructure. As such, the impact of the policy on the objective that relates to providing and conserving green infrastructure is also considered to be uncertain.

(5.50) Again mentions uncertainty in the council decisions and in my view at least suggests they don't know what will happen when developers have free reign to build on our Green Belt. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.51 Similarly, although the policy would result in development taking place in the vicinity of a number of water bodies, there is limited certainty over whether this would impact on the water quality of these waterbodies. Consequently, it is considered that the policy would also have an uncertain impact on the objective of protecting, improving and where necessary, restoring the quality of inland, and estuarine waters.

We have yet to see a definitive study of water quality after development, and we suggest the loss of some 110 hectares of open countryside will seriously impact local wildlife

KGBS 14 - South of Whiston

5.82 Policy SUE1 identifies South of Whiston as a SUE primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development including the Local Wildlife Site but excluding Public Open Space. This option would not introduce any phasing restrictions but would include a policy requirement for ancillary facilities (e.g. Retail and Public Open Space). The second option considered was to allocate the site for housing development with site-specific allocations for retail and Public Open Space provision but no phasing restrictions. The third option was to allocate the entire site for housing development with no phasing restrictions.

We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision.

5.83 The appraisal concluded that each of these would have a similar impact on a number of the sustainability objectives. In particular, given the substantial capacity of the site, it concluded that each option could have a major positive impact on the objective of providing good quality housing and that this impact would become increasingly significant as the development is built out. However, by introducing a potentially inflexible approach to the provision of open space and retail, the appraisal recognised that Options 2 could have an adverse impact on the deliverability of the site which reduces the level of certainty that the option would have a major positive impact on the objective. Due to the size of the area and the quantum of development it could accommodate, each of the options could also generate a number of employment and training opportunities in the construction sector and

could stimulate further investment in the area. As such, the appraisal noted that each of the options has the potential to have a positive impact on the objectives that relate to reducing deprivation; skills and training; business competitiveness; and unemployment.

Once again there is too much that is hopeful and of little certainty and i would re-iterate my previous comment. We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision. This decision is at odds with local Public opinion and also at odds with the localism bill.

5.84 The appraisal considered that each of the options would also result in development taking place in close proximity to a range of local facilities and amenities including primary schools, a GP and health centre and a local centre on Greene's Road and development in this location could make a contribution to the continued viability of these services and facilities. Options 1 and 2 would also support the provision of certain facilities/amenities within the site. As such, each of the options could have a positive impact on the objective that relates to access to services and amenities but there is a higher level of certainty that Options 1 and 2 would have a positive impact on this objective due to these options resulting in the provision of facilities on-site. Given the significant capacity of the site, each of the options also has the potential to have a positive impact on Knowsley's town centres and the local centre on Greene's Road by increasing levels of expenditure in these centres. As such, each option could have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town centres

The retail centres mentioned at Greenes Road is a small satellite and little could be done to expand it. Increasing the footfall would inevitably increase traffic in what is already a very congested area. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.85 The appraisal did however recognise that each of the options could impact upon the setting and significance of a number of heritage assets and have a negative impact on the objective that relates to Knowsley's built heritage. These assets are however located towards the edges of what is a large site and there may be scope to incorporate an adequate buffer around these assets to protect their setting. Consequently, there is only a limited level of certainty that each option would have a negative impact on this objective. By resulting in the loss of a significant area of greenfield land and by potentially placing pressure on areas of ecological value, each option could also have a negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the

objective that relates to air quality. There is however a lower level of certainty that Options 1 and 2 would have a negative impact on this objective as both of these options would support the provision of some facilities on the site which could reduce the need to travel and associated vehicle emissions. Each option could also have a major negative impact on the objective of adapting to climate change; a negative impact on the objective of mitigating climate change; and an uncertain impact on the objective that relates to protecting water quality.

Once again the councils own comments highlight the negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the objective that relates to air quality, and also increase congestion.

5.86 Each option would result in the loss of a substantial area of greenspace, sections of which are used for informal recreation, and could therefore reduce opportunities for participation in informal sport and recreation and thereby have a negative impact on the objective that relates to health. Nevertheless, Options 1 and 2 would provide support for the retention/provision of areas public open space and could therefore have a positive impact on the objective. Conversely, Option 3 would not support the retention/provision of areas public open space and would therefore have a negative impact on the objective. Options 1 and 2 would also result in the provision of some facilities on the site which could help reduce the need to travel and have a positive impact on the objective that relates to reducing the need to travel and improving the use of more sustainable transport modes. By contrast, as Option 3 would not directly support the provision of on-site facilities, this option has the potential to have a negative impact on this objective.

Once again the councils own comments highlight the negative impact on outdoor activities and recreation for local people.

CS5 - Green Belt

5.133 The revised policy would have a largely similar impact on the sustainability objectives to the version of the policy included in the Core Strategy Submission document.

The use of Green Belt for building is overwhelmingly opposed by the majority of residents. The reason used by the council for use and early release of Green Belt does not meet the NPPF in regard of the 5 purposes of Green belt and Extraordinary needs do not exist, to remove Best and Most Versatile agricultural land. It is also at odds with latest government thinking. See 4.10

5.134 The policy would continue to protect the majority of Green Belt from inappropriate development but, as with the previous version of the policy, would support the identification of a series of sites for release from the Green Belt to ensure that there is sufficient housing and employment land to meet the needs of the Borough. However, the proposed modifications to the policy would mean that the release of these Sustainable Urban Extensions (SUEs) is no longer controlled by a phasing mechanism and the modifications would also result in these sites being allocated for development rather than just identified as broad locations. These modifications mean that the SUEs would now be more likely to come forward earlier in the plan period. As a result, many of the impacts that would have occurred in the longer term under the version of the policy included in the Core Strategy Submission document would now occur earlier in the plan period under the revised policy.

The rapid release of Green Belt land can only be to the benefit of developers and will put back development of brown field sites. The council admitted at the hearing that early release of Green Belt will result in the delay of development of brown fields, and this too is highlighted by latest government thinking, see 4.10. The proposal to release Green Belt early is a poor decision not made in the best interests of local people. We will quickly see what a poor decision it was.

5.135 By continuing to support the identification of SUEs and safeguarded land for housing and employment development the amended policy would continue to ensure that there is sufficient land to meet the Borough's development requirements. It is therefore envisaged that the revised policy would still have a positive effect on the objectives relating to poverty and deprivation; housing; the growth potential of business sectors; and maintaining high and stable levels of employment. However, as noted above, these impacts are now predicted to occur earlier in the plan period. In addition, by potentially resulting in the SUEs coming forward earlier in the plan period, the modifications to the policy could result in the SUEs competing with the Council's regeneration objectives for urban areas. As a result, the modifications to the policy reduce the level of certainty that it would have a positive impact on the objective that relates to poverty and deprivation.

The proposal to release Green Belt early will impact on the council stated regeneration objectives. Little in the way of long term employment will come from vast housing estates, only a greater demand on roads, schools, GP's and a lowering of air & water quality with an increase in noise pollution.

5.136 In addition, as the amended policy would result in some housing and employment development taking place in areas on a series of predominantly greenfield sites that are presently within the Green Belt, it could have a negative effect on the objective relating to land and soil and an uncertain effect on the objectives relating to landscape character and accessibility; and Green Infrastructure. Key mitigation measures to address some of these impacts will include ensuring new

development is built to an appropriate density, retaining areas of woodland, securing the provision of on-site open space, and securing appropriate landscaping to moderate the impact of proposals on the local landscape character.

I have already called into dispute the density quoted by the council as the proposal in South Whiston and the Council average density of 30 dwellings per hectare is significantly above the information they have given the public and what they have consulted on. Consultation is 1503 against 2481 according to calculation using average density(4.10). Latest planning applications are far in excess of what the public were told, Recently Knowsley gave outline planning permission for 207 dwellings at Bank Lane, Kirkby (even though the site is still in the Green Belt). This is a difference of 76 dwellings, and represents a 58% increase on the capacity that Knowsley Council said the site had.

5.137 As some of the SUEs are used for informal recreation and others contain sports pitches, it is considered that the revised policy could also still have a long term negative impact on health. The proximity of some of the locations to designated heritage assets and the presence of archaeological assets within some of locations mean that the revised policy would also still have an uncertain impact on the objective relating to built heritage in the longer term. It is also considered that the policy still has the potential to have a negative impact on the objective relating to biodiversity. Undertaking ecological surveys, excluding areas of priority habitat from the developable area and the provision of on-site habitats are all likely to be key mitigation measures. However, as noted above, these impacts are now predicted to occur earlier in the plan period.

Uncertain impact on archaeological assets within the area will be compromised. We have not seen Ecological research to discredit the assertion that removing this area from Green Belt will not have a catastrophic effect. The modifications will bring the ecological disaster forward, so that we may see them before our Grandchildren do.

5.138 The revised policy still would have the potential to result in more dispersed patterns of development. In addition, the construction and operation of the development that would be delivered on the SUEs would inevitably result in carbon dioxide emissions. Consequently, and notwithstanding the fact that the Knowsley Local Plan Transport Feasibility Assessment (2012) identified that some of these locations have good accessibility to bus routes, cycle routes and services and facilities, it is considered that the revised policy would still have an uncertain effect on the objectives relating to mitigating climate change; protecting air quality; and minimising the need to travel.

This point is broadly supporting our ascertainment as to the detrimental impact on traffic within the area. Local People contest the accuracy of the Knowsley Local Plan Transport Feasibility Assessment (2012) as our research carried out by local people show more than 400 vehicles per 30 minute session at peak times and if deliveries took place to Tesco with Artic then the whole area became log jammed. Only one bus per

hour was spotted until 7pm when the service stopped. We would assert that the transport assessment is out of date and not relevant to the increase in traffic we have seen and would call for another assessment to be carried out.

CS14: Principal Regeneration Area – Prescott Town Centre

5.156 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process. The revised policy would still direct investment to Prescott town centre and would seek to intensify its retail function, encourage a wider mix of uses and create a distinctive identity and a complimentary evening economy. As such, the revised policy would still have the potential to have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town and local centres. The amended policy wording does however remove some of the restrictions placed on retail development in Cables Retail Park. In particular, it is no longer specified that retail development within Cables Retail Park should provide for convenience or bulky goods retailing and should maintain the current retail floorspace capacity of the Retail Park. These amendments could increase the scope for further investment in the Retail Park and result in a consequential reduction in investment in Prescott town centre, particularly as the Knowsley Local Plan Economic Viability Assessment (2012) indicates that comparison retail in Prescott town centre is generally unviable in current market conditions. This reduces the level of certainty that the revised policy would have a positive effect on the objective.

Prescot town centre is run down and irrelevant in retail terms, even the council have had to move offices to an ex pub at vast expense, just to fill another empty building. When the council allowed Tesco to build a massive supermarket at Cables Retail park it as good as sounded the death knell of Prescott town centre. (5.156) Broadly agrees with our assessment.

5.157 By reducing the level of certainty that the policy would support investment in Prescott town centre, these proposed amendments mean that there is also a lower level of certainty that the revised policy would have a major positive impact on the objective that relates to protecting and enhancing Knowsley's built heritage.

Not proved

5.159 There are no anticipated negative effects on the sustainability objectives. The proposed modifications would not however prevent the policy from having an uncertain impact on the objective relating to mitigating climate change

Not proved. Agrees with earlier points that state the policy will have a detrimental effect on climate change.

5.177 The revised policy also still encourages the re-use of vacant and underused historic assets and states that favourable consideration will be given to schemes that enhance the importance of the asset for the economy. The policy could thereby result in the creation of premises for new businesses. In addition, protecting and enhancing buildings and features of historic interest should help create more attractive places to invest in and could lead to enhancements to Prescot town centre. Consequently, the amended policy would also continue to have the potential to have a positive effect on the objectives relating to poverty and deprivation; increasing the number of new businesses; enhancing the vitality and viability of town and local centres; and maintaining high and stable levels of employment and reducing long-term unemployment.

Developers will not consider run down existing areas, whilst vast areas of Green Belt are available, which are considerably easier to develop.

CS21: Green spaces and Trees

5.179 The proposed modifications to the policy would have some impact on the performance of the policy against a number of sustainability objectives. In particular, although the revised policy still seeks to resist new development which would result in the loss of greenspace and would provide support for the provision of new areas of greenspace, the modifications to the policy mean that it would now encourage the retention of existing trees and woodlands and the appropriate planting of new trees rather than require this. This amendment to the policy wording is considered to reduce the level of certainty that existing trees would be retained and new planting secured. Consequently, whilst it is considered that other aspects of the policy would ensure that it continues to have a major positive impact on the objectives that relate to landscape character and green infrastructure; and a positive impact on the objectives that are concerned with adapting to climate change; mitigating climate change; water quality; and air quality; it is considered that this modification results in only moderate certainty that the policy would have a positive effect on these objectives.

Once Knowlsey has shown itself to be open to removing Green Belt from protection, future planning applications will use this behaviour to push for more releases. This is a slippery slope that Knowlsey council have embarked on which will create a borough which only has an ex tip and non-public green space.

5.181 The revised policy would still seek to resist the loss of greenspace and would provide support for the improvement of existing public open spaces and encourage the provision of new greenspaces. It could therefore help provide opportunities for participation in sport and recreation which would have a positive effect on the objectives relating to health; and poverty and social deprivation. It is however recognised that the provision of opportunities for sport and recreation does not necessarily guarantee engagement in these activities and, as a result,

there is only a low level of certainty about the effect on these objectives.

I would welcome the opportunity to see where Knowsley believe they can get new green spaces from? Also the council have overstated the positive impact on health, poverty and social deprivation that a vast estate of houses can have. It is more likely that this influx of residents could also increase anti-social behaviour.

CS22: Sustainable and Low Carbon Development

5.183 It is envisaged that the proposed modifications to the policy for Sustainable and Low Carbon Development would have a number of impacts on its performance in the sustainability appraisal process. The amended policy still requires development to incorporate a range of measures which would improve its sustainability. Nevertheless, the removal of the requirement for new development to achieve particular Code for Sustainable Homes/BREEAM standards and the removal of the requirement for development to incorporate decentralised and low carbon energy, means that there is a lower level of certainty that the policy would have a major positive effect on the objective that relates to mitigating climate change. Similarly, by not requiring new development to achieve particular Code for Sustainable Homes/BREEAM standards it is considered that the policy is less likely to result in new developments which incorporate water conservation measures or make use of recycled materials. As such, the proposed modifications mean that there is a lower level of certainty that the policy would have a positive impact on the objectives that relate to minimising the production of waste and increasing recycling rates; and ensuring the prudent use of water and mineral resources.

To remove the need for developers to meet Code for Sustainable Homes/BREEAM standards is another nail in the coffin of our councils green credentials. It is a bizarre decision at the start of the 21st century, particularly as we all face the prospect of climate change. The demand on energy, water and other resources is likely to be much higher.

5.184 In addition, the removal of the requirement to achieve certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.

Once again this point is totally at odds with other statements and shows that there would be a negative effect on the objectives that relates to poverty and deprivation; and health.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



RETURNING THIS FORM

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	J WARRING	
Job Title (if appropriate)	Retired	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

J Waring

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

K9BS 14

Policy Ref

Paragraph Ref

3.

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

MAJOR Traffic increase & Road accidents
No rooms in schools
more Pollution
There is a need to consider the impacts
of flooding & flood risk
The re use of land should be promoted
to minimise the take of greenland.
To conserve wild life & flowers
and fishing lake

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

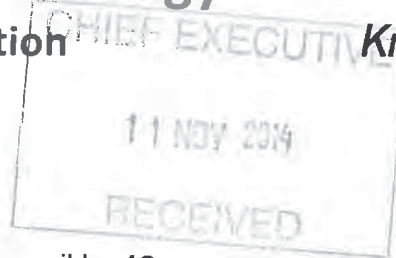
1/11/14



Knowsley Local Plan: Core Strategy

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Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR + MRS	
Name	JACK + BARBARA CREGG	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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KNOWSLBY LAKE PLAN

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

JACK + BARBARA CRIBB

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I HAVE LIVED AT THIS ADDRESS ALL OF MY LIFE, THE COUNTRY VIEW IS LOVELY AND RELAXING, AND THE FARMERS LIVELIHOOD, WHICH IS ALL GOING TO BE TAKEN AWAY FOR BUILDING. I UNDERSTAND PEOPLE NEED HOMES TO LIVE IN, BUT THERE ARE LOTS OF PLOTS OF LAND IN THE AREA THAT COULD BE USED IF NEED BE, INSTEAD OF USING GREEN BELT LAND. AS REGARDS BUILDING OFFICE UNITS, THERE ARE QUITE A FEW CLOSE BY THAT HAVE BEEN BUILT AND STANDING EMPTY, SO WHY BUILD MORE. IF NEED BE PLANT SOME TREES, OR MAKE A PARK, THERE'S HARDLY ANY GREENERY LEFT IN THE AREA NOW, WE ARE BEING ADVISED ALL THE TIME TO PLANT MORE TREES TO PUT OXYGEN INTO THE AIR

Continue on a separate sheet if necessary...

* SEE ATTACHMENT *

(2)

ATTACHMENT

WE ARE A LOT OF TREES ON THE LAND IN QUESTION WHICH ARE ALL GOING TO BE DESTROYED BY BUILDING HOUSES

THERE IS A LOT OF WILDLIFE, WHICH AGAIN IS GOING TO BE DESTROYED, WE ARE BEING ASKED ALL THE TIME TO DO VARIOUS THINGS TO ENCOURAGE MORE WILDLIFE INTO OUR GARDENS AND AREA, AND YOU ARE PROBABLY TO RUN TO AREA.

KNOWSLEY LANE WAS MADE AND USED AS A COUNTRY LANE. IT WAS NEVER INTENDED TO TAKE THE VOLUME OF TRAFFIC THAT IT IS ALREADY USING IT, IT IS ALWAYS VERY BUSY 94 HOUSES WILL POTENTIALLY INCREASE TRAFFIC BY 180+ VEHICLES, THAT IS WITHOUT THE EMPLOYMENT SIDE, WHICH WILL HAVE A LARGE IMPACT. KNOWSLEY LANE IS FAR TOO DANGEROUS TO HAVE NEW ROADS PASSING EXTRA VEHICLES ONTO IT, IF TRAFFIC IS TO JOIN AT THE ROUNDABOUT ON LIVERPOOL ROAD, THAT IS ALSO TOO DANGEROUS AND CONGESTED, LIVERPOOL ROAD ROUNDABOUT IS ALREADY VERY CONGESTED, THERE IS VERY OFTEN A TRAIL BACK OF VEHICLES UNABLE TO GO ONTO THE M57 OR THEN ONTO LIVERPOOL ROAD, IT WOULD BE MADNESS TO THINK THAT THESE ROADS COULD COPE WITH THE IMPACT THAT BUILDINGS ON THIS SITE WOULD CAUSE.

P.T.O

3

WE HAVE DONE A BRIEF SURVEY OF TRAFFIC ON KNOWS
LANE

AT MIDDAY ON A SATURDAY IN OCTOBER, WE COUNTED IN
4 MINS THAT WERE 95 VEHICLES GOING TO OR FROM
KNOWSLEY DIRECTION.

WEDNESDAY 22/10 IN 6 MINS 146 VEHICLES PASSED
APPROX 8:00AM

THURSDAY 23/10 IN 5 MINS 106 VEHICLES PASSED
APPROX 5:30PM

FRIDAY 24/10 IN 12 MINS 252 VEHICLES PASSED
APPROX 4:15PM

STABLY FROM THESE FEW FIGURES YOU WILL REALISE
THAT KNOWSLEY LANE IS UNABLE TO TAKE ANYMORE
TRAFFIC, IT IS UNSAFE NOW WITHOUT SUCH A FURTHER
INCREASE

If you are **objecting** to the modification please set out **how** you consider it should be modified to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

I JUST WANT IT

b) Yes, I wish to participate at any further public hearing

STOPPED

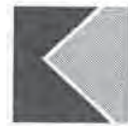
PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

9/11/14



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Ms	
Name	Jacqueline Lunt	
Job Title (if appropriate)	Senior practitioner	Health - child + Adolescent mental
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation Jacqueline Lunt

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref KGBS14 Paragraph Ref E1
~~12~~

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
a) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input type="checkbox"/> ← maybe but NOT sound
b) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

E1. unsound because
It is impossible to see how so many homes being built on our greenbelt will be helpful and in anyway positive for the environment and quality of life for the people of Whistler the surrounding area.
we will lose land that wildlife inhabits + there will be reduced habitat for insects and most importantly pollinating insects that are essential for future food production as well as the local ecosystem.
Knewley is a highly deprived borough + has multiple ongoing public health issues. The increase in traffic during construction + after human inhabitation will result in poorer air quality for the people of Whistler, there is already far too much asthma in children + adult health problems.
I use this area to walk in and this has been helpful to my physical + emotional wellbeing as I have grown up as a child and into adulthood.
Continue on a separate sheet if necessary...

→ ctd

ctd.

EI ctd.

The proposals in this plan would greatly reduce the quality of life for people in Whiston. The quality of life would be impacted in a detrimental way eg cars already back up at the lights in Whiston village past my house (No 38) resulting in me + my 11 week old son breathing air that is polluted with car fumes. This will only be worse with more residents living in the area. Car fumes cause health problems that impact on physical health. There will also be an increase in noise from these cars and this increases stress levels and is unhelpful to emotional wellbeing; this is especially pertinent to Knowsley residents as we have far too many health problems that need to be addressed and not made worse by more houses.

The woodland in big wood is many years old and as Knowsley residents this is our only possible access to established woodland. The woodland will be damaged and would not remain intact by the presence of so many new houses built in the area. This sort of woodland takes many decades to develop and can not be replaced and should not be morally put at risk in this way. The wood would become isolated oases amidst houses + impact on its capacity to be a home for wildlife and the movement of animals + insects. Please protect this area + do not build on this land, leave it alone.

EG. Environment I object to the release of this land as it is established greenfield with good soil quality that has taken many many decades to develop + evolve. The new plan will result in loss of this quality of greenbelt that the plan does not in any way replace or restore. Please leave this land alone.

55. Social reasons

I have lived my entire life in Whiston and now have my own son aged 11 weeks. I am greatly concerned that he will not have the recreational opportunities that I, and my generation have been able to enjoy. It is currently possible to walk to areas of greenbelt and enjoy the clean air, wildlife, peace + quiet. This area offers this as a goal for physical health via opportunities to exercise in the area and feel free and happy to walk + exercise. This is also extremely helpful in promoting mental + emotional wellbeing. I feel that this development will have a detrimental effect on the mental health + wellbeing of the people of Whiston and is therefore a potential significant blow to the quality of life for people in Whiston.

please do not go ahead with these plans.

please refer to consultation process I have not had sufficient consultation about this as a Whiston resident.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Release only brownfield.
This is immoral + release of greenbelt is not
acceptable...

This is not consistent with national policy + aims to
protect public health.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1.11.14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JAMES O'BOURKE	
Job Title (if appropriate)	PRINTER	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The development of Green Belt in Whiston will have a negative effect on the aim to mitigate climate change. The Sustainable and Low Carbon Development (S.183 S032-CS22) removal of the developers need to meet sustainable homes/ BREEAM standards will increase energy ~~usage~~. The increased traffic in the area will increase carbon emissions and have a detrimental effect on air quality. The Industrial Estate mentioned on Windy Arter Road has little effect on employment as the few factories that are occupied, have no need for more workers. There is also an acceptance that this development will not be suitable for energy generated by renewable sources. In addition, the removal of the requirement to achieve a certain Code for Sustainable Homes standards mean ~~there~~ there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health. "The need to build more sustainable housing with a limited supply of land means that innovation is necessary but walking towards sustainable communities relies on more than the achievement of zero carbon housing; its success will also be determined by the selection of appropriate locations for development", Neil Williamson FLI, President Landscape Institute

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

There are plenty of 'brown field' sites that could
~~be~~ be utilized first. Use empty properties.
Keep us better informed.

Continue on a separate sheet if necessary...

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5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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b) Yes, I wish to participate at any further public hearing

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Signature



Date

01/11/14.



Knowsley Local Plan: Core Strategy

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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	<i>MR.</i>	
Name	<i>JAMES R. ORMOND</i>	
Job Title (if appropriate)	<i>RETIRED</i>	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KGBS 14

Paragraph Ref

E1

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I OBJECT TO THE EXTRA POLLUTION, TRAFFIC NOISE THAT THIS WILL CREATE.

ALSO THE VAST AMOUNT OF GREEN BELT AREA THAT WILL BE LOST

ALSO THE EFFECT THIS WILL HAVE ON THE LOCAL COMMUNITY

IE. STRAIN ON SCHOOLS, ~~OR~~ HEALTHCENTRES DR. APPOINTMENT

WE HAVE TO WAIT OVER A WEEK NOW TO SEE A GP?

THIS WILL ALSO IMPACT ON THE LOCAL PARKING AREAS.

THE WILDLIFE IN THIS AREA WHICH HAS NOT BEEN

CONSIDERED). AS FAR AS I AM CONCERNED.

RELEASE OF THE GREEN BELT AREA IN S. WHISTON WILL

CONTRADICT THE PURPOSE OF GREEN BELT TO RETAIN ATTRACTIVE

LANDSCAPES. AS THIS IS THE LAST AREA OF GREEN BELT WITHIN S. WHISTON

AREA. WE WILL NO LONGER HAVE A Continue on a separate sheet if necessary...

TO THE NATURAL ENVIRONMENT AND THE BENEFITS THIS ENSUES

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

There is no reason to build on greenbelt
there are enough brownfields and empty
properties in the Knowsley area
Take into account guidance from Eric
Pickles on 16th Oct 2014 -
Carry out up to date transport survey
take into account population figures
from ONS 2014
Re-convene public inspection

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature

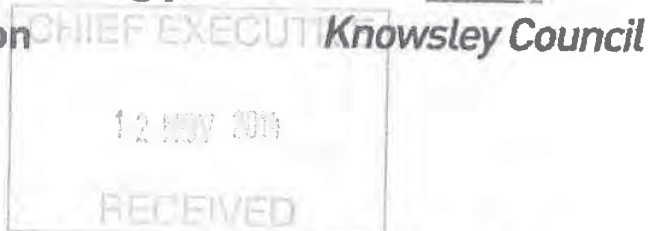


Date 01/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	
Name	JANET CREHAN	
Job Title (if appropriate)	RETIRED.	
Organisation (if appropriate)	—	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

JANET CREHAN

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGB 14

Policy Ref

KGB 14

Paragraph Ref

E1
KGB 14

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I wish to object to this scheme because this will ruin the environment, the peace & quiet. It will swallow up Old Whiston village - closing shops, ruining the historical area. What is the matter with releasing Brown Belt areas? We returned to this area for a quiet life after working 45 years in the Health Service, this was our dream now its a nightmare !!!

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

The Road system will be overloaded and will cause ~~more~~ tailbacks and frustration.

This Area is a poor area - re: health, both respiratory and cardiac. ~~More~~ More housing and getting rid of the Green Belt area will be detrimental to us all

Continue on a separate sheet if necessary...

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5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	
Name	JANET ROURKE	
Job Title (if appropriate)	—	
Organisation (if appropriate)	—	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

JANET ROURKE

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Councils philosophy about new housing contributing to economic development and population retention is fundamentally flawed. See first paragraph in Document KQBS 14, SA Objective ECI (above) outlining 'None of the options for Land to the South of Whiston include an employment element'

May encourage further investment in the area sustaining local employment and also potentially bringing new jobs into the area is not a 'sound' reason for economic development, competitiveness and productivity of business as stated Document KQBS 14 SA Objective ECI.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Carry out an up to date housing requirement survey taking into account the latest figures from the office of National Statistics.
Carry out a relevant Traffic Management Survey taking into account the existing roads at peak times and the additional roads placed upon the area with an influx of at least 2200 vehicles.
Insist that empty properties and brown field sites are developed before considering GREEN BELT release.
Put back any Green Belt release until end of plan period and even then consider all other areas, green belt release should be the last resort, not the first action. Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

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Signature



Date

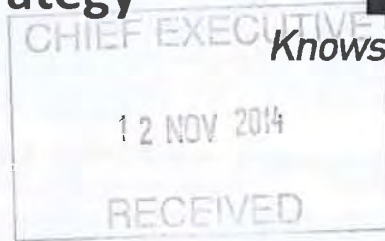
1st Nov. 2014

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JASON BROWN	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Greenbelt Action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

WHISTON GREENBELT ACTION GROUP

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

MOSS TO
MOGS

Policy Ref

CS1, TOCS
SUE ADSI

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

THE PLAN IS UNSOUND DUE TO THE COUNCIL'S FAILURE TO ADEQUATELY CONSULT WITH THE PUBLIC AS A LOT OF PEOPLE HAVE ONLY JUST HEARD ABOUT THE PLANS. I WOULD STATE THAT POLICIES OUTLINED IN CS1 TO 5, ADSI AND SUE DOCS ARE OUT OF STEP WITH PUBLIC OPINION. I WOULD ASK THAT THE PUBLIC MEETINGS WITH THE INSPECTOR BE RE-CONVENED TO TAKE INTO ACCOUNT VIEWS OF LOCAL RESIDENTS AS STATED BY THE GOVERNMENT IN THE LOCALISM BILL. THE COUNCIL HAVE NOT UTILISED EMPTY PROPERTIES AND BROWN FIELD SITES INTO ACCOUNT ALSO THEY HAVE USED OUT OF DATE POPULATION FORECAST FIGURES. THEY HAVE NOT CONSIDERED THE TRAFFIC INFRASTRUCTURE

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

CARRY OUT AN UP TO DATE HOUSING REQUIREMENT TAKING INTO ACCOUNT LATEST FIGURES FROM ONS
TAKE INTO ACCOUNT STATEMENT FROM ERIC PICKLES MP REGARDING THE RELEASE OF GREENBELT. THESE ARE NOT EXCEPTIONAL CIRCUMSTANCES.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and there is a further public hearing** as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature

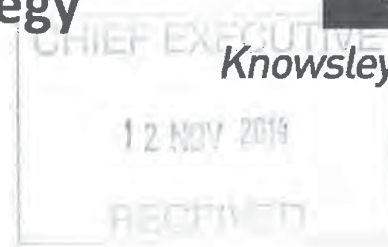


Date 29/10/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	JEAN	
Job Title (if appropriate)	HCA	
Organisation (if appropriate)	NHS	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation JEAN PHILLIPS Local Resident

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref K GBS
14 Policy Ref E2A Paragraph Ref E2

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

My objection to this plan + worry is the local character and natural landscape of South Whiston stems from the early 12th century however the southern part of the country stays greenbelt. There are ample brown field sites which can be used. We have two schools which already have ample pupils in attendance and this will cause these schools to burst at the seams more investment and support needs to be ringfenced for agricultural development and education to enable resilient and sustainable communities enabling the community to grow our own fresh food. I also feel traffic will double thus putting the old, the children and the venerable people in South Whiston at risk.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

M.P. ERIC Pickles. Recently made comments to Planners regarding the Protection of Greenbelt. Please can you listen to his views. OWS have recently produced new figures on population can you please take these into consideration and reconvene the public inspection.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature 

Date



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Dr	
Name	Jennifer Mullin	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation Jennifer Mullin

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref KGBS 14 Paragraph Ref E1

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I do not think that the proposed plan is sound for the following reasons:

- It is the last remaining proper green space in the Whiston area.
- The infrastructure around the area cannot cope with so many new houses. For example GP surgeries, NHS drop in centres, Schools, the local hospital, child care facilities etc.
- The proposed development will lead to a great increase in pollution due to increased traffic. The industrial development of the former colliery site will also lead to increased levels of pollution
- The development will put extra strain on the already busy roads. Tarbock roundabout is already extremely busy. This will lead to gridlock.
- There are already not enough jobs to support the local community. More residents will lead to increased competition for existing jobs. This will result in higher levels of unemployment and lead resentment from existing residents.
- The site is an important habitat for lots of wildlife, including some rare species. The development would be extremely detrimental to the wildlife.
- Natural green space is important to resident's health and wellbeing. It is especially vital in Knowsley as there are two major motorways in very close proximity. The greenbelt land provides an important divide between these noisy, pollution filled motorways and resident's homes.
- Brownfield sites already exist in Knowsley which would be better suited to development. These brownfield sites should be developed before greenbelt sites are even considered for development.
- There are no exceptional circumstances to justify the destruction of the long established Green Belt land in Whiston.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

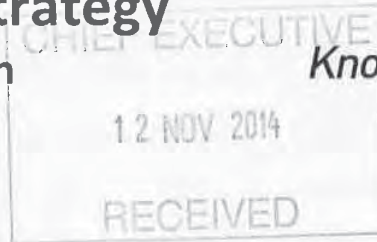


Date 11/11/2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: / Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	JOAN MEDDER	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification.)

Name and/or Organisation

MRS JEAN MEYDER

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

East of Knowsley
Ind & Business
Parks

Policy Ref

North of
A580

Paragraph Ref

KFY

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

My support in opposing the proposed release of Green Belt land. In and around Knowsley Village. Is to safeguard the land being safeguarded for development, within the Village. However my property is located at the edge of the Village. Within a separate site named "East of Knowsley Ind & Business Parks" and earmarked for "Employment". My objection is if this land is developed for employment I will lose my privacy, as the land is adjacent to my back garden, as well as outlook from above. Increased noise & pollution. Increased Traffic. Where the level is high, Ducts hottest throughout day & night. Using Knowsley lanes get to the Business Park, adverse effect on the wild life, to numerous to mention. Which I have enjoyed for almost 38 years. Most importantly, the value of my house, also the quality of life. I moved here because we were told Green Belt land would never be built upon.

Continue on a separate sheet if necessary...

If you are objecting to the modification please set out how you consider it should be modified to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Building for future employment near my home is unsatisfactory, when outlets built around school have half lie empty.
The village is an historical place, and should stay like that. It will become a town, and lose its identity

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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Signature



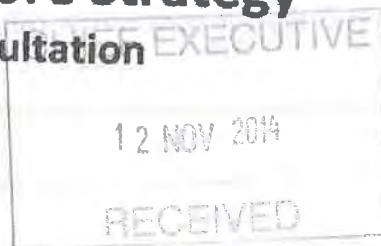
Date 10/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JOHN JONES	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Residents will no longer have access to the natural environment.

Release of south whiston greenbelt will contradict the purpose of green belt "to retain attractive landscapes ,

without sufficient connectivity of green corridors the isolate patches of greenbelt will biodiversity and environment quality .

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Develop all Brown Field sites, Before
considering any greenbelt:

Continue on a separate sheet if necessary...

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- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE *Knowsley Council*

12 NOV 2014

RECEIVED

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	JOHN M ^C CORMACK	
Job Title (if appropriate)	DIRECTOR	
Organisation (if appropriate)	ALLERTON GARDEN. & TREE SERVICES	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

K983B

Policy Ref

Paragraph Ref

K98514

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I moved here 13 years ago to live in a little bit of the country. If the proposal goes ahead there will be no country, trees and walks for our dogs. It is also a nightmare to get out of Whiston to Liverpool. Where I do 95% of my work. What will it be like if this goes through. Noise and pollution also worry me.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Utilise brown field land & disused properties and also public consultations should be quicker and better. ie more advertisement to inform the public

Continue on a separate sheet if necessary...

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a) No, I do not want to participate at any further public hearing

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Signature



Date

11/11/14



Knowsley Council

Knowsley Plan: Strategy

Local Core



Knowsley Council

Proposed Modifications - Consultation Representations Form

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Julie Anne Parker	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation J A Parker

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref M088 Policy Ref KGBS 17 Paragraph Ref 5.46A

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
a) Legally Compliant? (see guidance note 2.2)		
b) Sound? (see guidance note 2.3)		✓

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

SA

In the Infrastructure and development options study completed by Mott MacDonald 8/7/2014 relative to “ South Whiston and land south of the M62” .
The assessment is not sound as information is not factual.

Table 5.3 SWOT Analysis

Kings Business Park is almost full and Knowsley requires a successor B1 office Park'.....
There are 10 vacant units. This statement is not sound as there are a number of empty office units currently available on Kings Business Park and the landowners Commercial Property Developments have an option to increase the development of the business park for b1 use to the north of the site. I have attached an ariel view of the business park which demonstrates that the business park has potential to double in size – there are a number of planning documents available that support this application.

5.46A In the context of employment land, Green Belt release is required specifically to address Knowsley's overall development requirements up to 2028 and beyond. The immediate release of Sustainable Urban Extensions is necessary to provide an improved range, choice and quality of sites to address specific employment needs. These include provision for a high quality business park (as a successor to Kings Business Park, which is almost fully developed) and large scale distribution and

Logistics centre.

Mr Pike, can you take into consideration the 'level of need' for further business parks when there are a number of empty units for multiple uses available on Huyton Business Park, Whiston Business Park on Fallows Way and Kings Business Park in Prescot all within a 3 mile radius of the proposed SUE of Whiston south greenbelt.

Please also note the historically low attainment figures and aspiration of school leavers and Knowsley Councils ability to deliver the Local Plan based on the consistent failings of Local Authority services in Knowsley,

Notably;

ONS area of Indices of Multiple Deprivation

Knowsley has returned £18 million of much needed and unspent funding

Childrens services in special measures

Low attainment levels in Knowsley schools

The failure to deliver North Huyton Communities Future redevelopment programme effectively – there is little visible regeneration in this area, despite the first phase of a housing development being completed. The Centre for Learning school in this area closed within 2 years due to under subscription, the community centre is considerably under used and there is little synergy between the newly built community of 250 families and the existing community which has directly impacted upon crime and increased void properties in this area.

I also stress that I first received correspondence relative to the local plan in September 2014 and feel that I have been excluded from consultation, I feel that there is not a robust evidence base to justify the early release of greenbelt and ask you to extend the period of consultation.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

In the Local Plan M0157 Para 6.45 should delete the words “, and SUE 2c “Sustainable Urban Extensions - South Whiston and Land to the South of the M62”) and necessarily the links and other references consequent throughout .

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) Yes, I wish to participate at any further public hearing

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Signature



Date 14/11/2014



TOWN AND COUNTRY PLANNING ACT 1990

SITE ADDRESS: 16-21 Lion Court, Kings Drive, Kings Business Park, Prescott, Knowsley, L34 1BN

DESCRIPTION OF DEVELOPMENT: APPLICATION TO VARY CONDITION NO'S. 8 & 9 ATTACHED TO PLANNING PERMISSION 07/00746/FUL (ERECTION OF 8 NO. TWO STOREY OFFICES WITH ASSOCIATED CAR PARKING AND LANDSCAPING) TO ALLOW FOR DETAILS RELATING TO THE EMERGENCY ACCESS FACILITY & PEDESTRIAN ACCESS TO HUYTON LANE TO BE SUBMITTED PRIOR TO THE COMPLETION OF UNITS 17-21 AND NOT ON COMMENCED TO DEVELOPMENT (UNIT 16 CONSTRUCTED ONLY, 17-21 NOT COMMENCED TO DATE).

APPLICATION REFERENCE: 13/00283/FUL

APPELLANT'S NAME: Commercial Development Projects Ltd

APPEAL REFERENCE: A 13/00283/FUL/01/2013

APPEAL START DATE: 31 July 2013

A damning report into children's services in [Knowsley](#) said "widespread failures" were putting vulnerable children at risk.

Education watchdog Ofsted today branded Knowsley Council "inadequate" following an inspection of its services for children in need of help and protection, looked after children and those leaving care.

A review of the effectiveness of Knowsley's Safeguarding Children Board also concluded its performance was inadequate.

Inspectors said the council had a high turnover of social workers in assessment and safeguarding teams - and inexperienced staff were carrying out visits to children.

Ofsted's report said there were "significant weaknesses" in management, with a history of "infrequent and poor supervision" of social work staff. It said there had been improvements, but quality remained low.

Inspectors found record keeping was variable and often poor across social work teams. They said it was taking too long for children in care to be placed for adoption when it was in their best interest.

The report said: "Widespread failures and inconsistent practice across help and protection services leave some children and young people at risk of suffering harm.

"Too many children and young people who need help and support or who need to be cared for by the local authority experience drift and delay.

"Some have been left for too long in situations where they have suffered harm."

The report, published today, follows an inspection carried out at the end of April and beginning of May.

The report said senior council officers were aware of "significant deficits" in its services for children and families and an improvement plan had been drawn up - but it was too early to see any significant impact.

It read: "The local authority is aware of these weaknesses, and has developed an improvement plan.

"Recently appointed senior managers know what they need to do to improve the quality of practice and services for children and young people in Knowsley.

"However, remedial action is still at an early stage and significant impact is not yet evident in day to day practice."

New Deal for Communities

NHCF is the successor organisation to a central government funded programme known as New Deal for Communities (NDC).

This programme ran in Knowsley from 2001-2011 when the North Huyton area was awarded £55.8m to regenerate the area through a partnership board of local residents, ward councillors and agency representatives.

The funding was spread across 7 main themes in North Huyton: Health, Education, Crime, Employment, Housing, Youth and Community.

Over the 10 years, some 200 plus projects were commissioned by the independent Board to improve the performance of the area in comparison to the rest of the borough and elsewhere. This was achieved using a variety of in house and external delivery agents.

The North Huyton programme was rated as one of the leading NDC programmes in the country achieving 'excellent' status through the government's performance management framework.

Besides a comprehensive revenue based change programme, the Board also contributed to a number of key new build capital projects in the area including:

- 2 new Learning Centres
- Primary Care Trust Resource Centre
- Training and Skills Centre
- Youth Centre
- Community Centre



Councillor's anger as £18m of unspent funding businesses handed back to the Government

Oct 05, 2014 08:00

By [REDACTED]

Liverpool council cabinet member for skills [REDACTED] said the situation wasn't good enough



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Email



[REDACTED] in front of the Forever 21 store and the Lobster Pot fish and chip shop on Whitechapel, Liverpool city centre. Picture [REDACTED]

UP TO £18m of funding meant to help local firms and workers was given back to the government by a Merseyside council after it went unspent.

The cash, which was to be spent across the region, was being handled by Knowsley

Recommen

Improv

Improvement Notice

To: NAME Knowsley Metropolitan Borough Council ("the Council")
ADDRESS Archway Road, Knowsley L36 9YU

This Improvement Notice is issued to Knowsley Metropolitan Borough Council on 16 September 2014 following the findings of inadequate performance and arrangements for 'children who need help and protection', for 'adoption performance' 'leadership, management and governance', and for 'effectiveness of the Local Safeguarding Children Board' as identified in the Ofsted inspection report published 30 June 2014.

1. This Notice is given to address all the areas for improvement identified in the report of the inspection of services for children in need of help and protection, children looked after and care leavers and review of the effectiveness of the local safeguarding children board published by Ofsted on 30 June 2014.
2. To comply with this Notice, the following actions are required of the Council, working with its partner agencies ("partners") as identified by the Children Act 2004 (section 11), with clear evidence of improvement:

Understanding needs of children, young people and families

3. **Ensure that the needs of children and young people in Knowsley are reviewed and there is a clear statement of what children and young people can expect from services provided by social care and partners** by:
 - a. reviewing the Joint Strategic Needs Analysis and communicating a shared understanding of strategic priorities to staff and partners; with a clear focus on vulnerable groups who would benefit from help and protection, care and adoption.
 - b. setting out a process map of the children and family journey through the system including key transition points and target performance indicators;
 - c. ensuring the views of children and young people, their experiences and needs are gathered to inform individual care plans, the commissioning of services, improvements to services and that there is a system to record and report to the Local Safeguarding Children Board, the Improvement Board and children and families;
 - d. ensuring that children and young people are seen alone during statutory visits and their views recorded;

- e. ensuring social worker's report on child protection are shared with the family 24hrs before conferences; and
- f. ensuring that children and young people are provided with information about entitlements and how to complain.

Leadership, Management and Governance

4. **Ensure the Council sets out a statement of their vision and ambition** for children's services and an improvement plan ('the Improvement Plan') which sets clear objectives, timescales, outcomes and is supported by a data set including qualitative and quantitative information against performance indicators by 6 October 2014. Consideration should be given to, but not limited by, the *Children's Safeguarding Performance Information Framework 2012*. The statement and Improvement Plan should be communicated to and implemented by all staff including those in partner agencies. The Improvement Board ('the Board') is accountable for delivering the Improvement Plan.
5. **Ensure leadership, scrutiny and challenge is exercised** and impacts on the quality and effectiveness of safeguarding and looked after children services. By ensuring that:
 - a. effective assurance arrangements are in place within the Council and across the partnership in line with Department for Education (DfE) statutory guidance '*Roles and responsibilities of the Director of Children's Services and the Lead Member for Children Services*' and '*Working Together to Safeguard Children*';
 - b. elected members of the Council understand and deliver their corporate parent role for looked after children and meet all the statutory requirements, including statutory visits;
 - c. the lead member is supported by an experienced peer with a successful track record of providing political leadership in a Council that has gone through significant improvement following an inspection;
 - d. Council senior managers continue to consult staff and partners on the changes necessary to secure improved children services and that there is sufficient capacity to enable senior managers to implement the improvement activity and measure impact;
 - e. a culture of accountability is developed with managers, staff and partners holding each other to account with action taken when required to challenge poor and unacceptable performance; and
 - f. children's social care is represented on all key planning forums such as the Health and Wellbeing Board.

Early Help and Partnership Working

6. **Implement a prevention and early intervention strategy to provide children, young people and families appropriate support from early help to statutory intervention** by:
 - a. setting clear expectations that partners in health and the police play

- a full and active role in the identification and support of those who need early help and protection;
- b. developing and agreeing a local protocol for early assessment as set out in *Working Together to Safeguard Children* so all partners are able to respond to early needs and involve others as required;
- c. reviewing and monitoring the understanding, use of thresholds and criteria, and referral routes (including the take-up of CAF) by different partners;
- d. monitoring referral/re-referral rates and feedback from referrers;
- e. commissioning targeted services with partners with mechanisms for step-up/step-down between early help and statutory social care to ensure appropriate support and shared case leads across partners; and
- f. monitoring the contributions to, the use and impact of early help as made by all partners and to regularly report to the Board on this with recommendations to improve practice.

Quality and effectiveness of Practice

7. Improve the quality, timeliness and consistency of children's social care assessments by ensuring that:

- a. all assessments by the Council and partners follow the principles and parameters of a good assessment and are completed within timescales as stated in *Working Together to Safeguard Children*;
- b. all protocols are agreed and monitored and ensure information is shared in a timely fashion e.g. after key planning meetings where decisions are taken; and
- c. evidence, rationale and decision making for assessments are timely in being recorded.

8. Improve the quality, delivery and management of child protection practice and plans by ensuring that:

- a. all partners attend child protection meetings and strategy meetings and this is escalated and addressed when not occurring;
- b. child protection plans comply with the requirements of *Working Together to Safeguard Children* including ensuring that all plans include the views of the child, time bound actions, with assigned 'owners', and with measurable, success outcomes for children and young people;
- c. plans include review and evaluation points, with timescales agreed with other professionals along with information about their contributions;
- d. scrutiny, challenge and capability of Child Protection Conference Chairs is improved by having regard to statutory guidance;
- e. case records are regularly updated, in a timely fashion, to document any new or amended information, rationale and decisions as they arise; and
- f. evidence of management oversight, decision making and

appropriate action and chronologies, is set out in detail on each case file.

9. Ensure robust permanency, care planning and review of looked after children at the earliest point by :

- a. improving matching processes to ensure that the needs of children requiring long term placements are met;
- b. implementing a care planning tracker that is subject to regular review;
- c. clear systems are in place to ensure concurrent and parallel planning for children entering care;
- d. reviewing the procedures of the Independent Reviewing Officers to adhere to statutory guidance and to tackle any delays to the timescales set out in plans;
- e. ensuring there are sufficient foster carers and residential placements to respond to the needs of looked after children; and
- f. monitoring the educational achievement of looked after children against clear targets.

10. Improve the timeliness of adoptions by ensuring that:

- a. clear plans are in place to improve all aspects of adoption timeliness (local authority decision-making, placement orders, matching and placement);
- b. measures are taken to build on the introduction of recent new processes to address delays including the production of robust performance management information; and
- c. performance management information and a trajectory of likely impact on DfE's adoption scorecard indicators is reported and reviewed by the Board as part of the data set in paragraph 4.

Quality assurance, audit and management oversight

11. Ensure there is a robust and effective quality assurance framework to drive and evidence the impact of improvement with families, front line practitioners and key partner agencies that:

- a. uses quantitative and qualitative evidence, with a view to the effectiveness of practice and the degree to which it is safe;
- b. includes regular auditing arrangements of case files, with use of independent arrangements to review the quality and timeliness of recording and compliance in individual case records (as set out in *Working Together to Safeguard Children*);
- c. there is an agreed regular and planned approach (including the size and scope of audits), to update the Board on audit findings and analysis, along with recommendations to improve practice, which should also inform the work of the LSCB; and
- d. ensures recommendations and actions are measurable, inform improvements in practice, workforce development and supervision.

12. Establish effective supervision and management oversight by

ensuring that:

- a. all staff continue to have regular supervision;
- b. that supervision is reflective to promote learning, in line with agreed protocols, with training available for supervisors;
- c. social worker responsibilities and workloads are defined and reviewed with a range of work for staff consistent with their level of experience and competence (including protected caseloads for Newly Qualified Social Workers); and
- d. all management oversight (such as case discussion, supervision and audit) is conducted in line with standards set out in *Working Together to Safeguard Children* to ensure safe practice and decision making on individual child protection cases.

Staff capability and capacity

13. Develop a **workforce strategy** which is based upon an analysis of need. The workforce strategy must include clear recruitment and retention strategies, set out how poor performance and capability issues will be dealt with and an analysis of skills and training needs required to deliver good social work. It should be implicitly linked to the Improvement Plan, and clearly related to service plans and audit outcomes. The strategy should be aimed initially at reducing the dependency on agency staff and should include:

- a. support for newly qualified social workers is reviewed to ensure that it meets need and results in them becoming advocates for the service in Knowsley;
- b. a review of, and improvement to, tools and systems required to deliver good and agile social work including the electronic information system; and
- c. staff engagement and regular feedback to improve and shape practice using feedback mechanisms, such as staff surveys and report the results to the Improvement Board.

Local Safeguarding Children's Board (LSCB)

14. **Strengthen the LSCB so it can ensure that partners work together effectively and are held to account for their responsibilities** by ensuring that:

- a. there is action to improve the effectiveness of the LSCB, to ensure its compliance with the requirements of *Working Together to Safeguard Children* and that partners are fulfilling their obligations under section 11 of the Children Act 2004;
- b. multi-agency practice and individual partner audits are robust, with reporting to the Improvement Board on any key lessons and recommendations to improve practice;
- c. all partners are committed a shared set of priorities for safeguarding, child protection, and early help/intervention and

- prevention;
- d. all policies and training are reviewed and delivered to ensure understanding of thresholds in all agencies;
 - e. the LSCB learns from national lessons of serious case reviews and from LSCBs where effectiveness is considered good or outstanding; and
 - f. the chair of the LSCB reports progress to the Improvement Board meeting to inform the Improvement Board Chair's report to the Minister.

15. Taking account of the measures set out in this Improvement Notice the Council is expected to:

- a. Establish an Improvement Board ('the Board') and appoint an Independent Chair ("the Chair"). The Board is expected to meet at least every 6 weeks. If in the future the Improvement Board wishes to vary the frequency of meetings this must first be agreed by the Department for Education. An official from the Department for Education will attend board meetings as a 'participant observer'. The Board should include key partner agencies in its membership. The Council must provide the Chair with administrative support to a level sufficient for the Chair to undertake his/her role efficiently and for the Board to operate effectively. This to include provision to allow, at least 2 days every month for independent testing and validation.(either by the Chair directly or an independently appointed person on behalf of the Chair).
- b. The Council must develop an Improvement Plan by 6 October 2014 aimed at delivering improvements. The content of the Improvement Plan and a record of progress must be kept up to date. The Council must report to the Board on progress against the objectives in the plan and can commission updates from partners in order to do this. Reporting should include analysis and recommendations supported by reviewing performance trends against key data sets (which partners should agree) including quality of service and outcomes for children and young people. The Council should highlight those objectives which are slow to progress and highlight where contributions need to be strengthened.

16. The Council should aim for actions included in the Improvement Plan to be delivered within 18 months of the Ofsted inspection. The objectives and performance trends will form part of the discussion at formal review meetings with the Department for Education.

Improvement against the above measures will be assessed as follows:

- 17. The Improvement Board Chair must provide to the Parliamentary Under Secretary of State for Children and Families a written progress report against the areas set out in this Notice by December 2014 and every three improvement boards thereafter. The Chair's report should be based on

independent testing and validation of improvements.

18. In parallel, the LSCB Chair should also report to the Improvement Board meeting on progress to improve its effectiveness.
19. Progress reviews will be conducted by DfE officials and take place every six months until this notice is lifted, or at the specific request of the Department. Prior to the review, any Improvement Board Chair's report for that period will be supplemented by a Council report of progress against the improvement plan submitted to DfE a week in advance of the review. Such reviews may result in an amendment to this Improvement Notice and further action being required.

Failure to comply with this Improvement Notice by the assessment dates or poor progress:

20. Should the Council be unwilling or unable to comply with this Improvement Notice, or should ministers not be satisfied with the Council's progress at any stage, ministers may choose to invoke their statutory powers of intervention (s497A Education Act 1996) to direct the Council to enter into an appropriate arrangement to secure the improvements required in children's services.

Signed on behalf of the Secretary of State



Dated : 16 September 2014

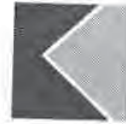


North Huyton Action Area Supplementary Planning Document

Knowsley Metropolitan Borough Council

February 2007

(Copy of Document PP05 provided)



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council

CHIEF EXECUTIVE

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MISS	
Name	June Anders	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

J. Anders

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KG B514

Policy Ref

Paragraph Ref

E3

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

- more traffic increased & potential more road accidents.
 - more pollution.
 - more likely to be an increase in the proportion of rain falling in heavy storms.
 - The re-use of land should be promoted to minimise the take up of greenfield land; which we have not got a lot of.
 - We need to maintain the economy and wildlife for the future generations.
 - impact of the local quality of water in the area.
 - Local residents use Big lake for recreation & fishing regularly. We need our Green fields.
- Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

my grandchildren planted tree's on one of the sites, and we regularly go to see how they are growing. It is part of these histories.
Save our green fields.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1-11-2014

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS KAREN EASTON	
Name		
Job Title (if appropriate)	BANK CLERK	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is ? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I have used Whiston greenbelt Land Daily for recreation purposes for the last 28 years. It is my belief that this is not sound because it will impact on my life in a negative way. I do believe that this proposal is against my human rights.

Continue on a separate sheet if necessary

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

This goes against the government and contradicts the statement by Mr Picdes that greenbelt land should not be released. I feel that the Inspector should not agree to the release of greenbelt land. All Brown belt land should be fully utilised.

Continue on a separate sheet if necessary

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	miss	
Name	Katy Andrews	
Job Title (if appropriate)	Banking customer relations manager	
Organisation (if appropriate)	Barclays	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation Katy Andrews

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref KGBS14 Paragraph Ref EC3

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

There is no evidence this development will bring employment to the area that is why I feel this proposed modification is not sound.

There's nothing to say local firms will be used for the construction, either

creating any further shopping outlets will also damage the local business causing further unemployment.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Allow brown belt land to be developed before considering the sale of Greenbelt.
Take into consideration the information given by Eric pickles about Greenbelt land.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature 

Date 11/11/14



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR C & MRS K	
Name	BROWN	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	██████████ ██████████	
Postcode	██████	
Telephone Number	██████████	
Email Address	████████████████████	
Preferred Method of Contact	██████	

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

SUE 1

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

It is considered the plan is not legally compliant because the level of consultation is insufficient. The nature of change is so extensive that all the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Governments commitment to deliver real local democracy through the localism agenda.

Our property is located on the site "East of Knowsley Ind & Bus Parks" designated as a primary use of "Employment". We are one of 3 residential properties on the Knowsley Village side of the A580 and to remove this section of land from the greenbelt for employment use would significantly affect us.

We would suffer from loss of privacy as the land is adjacent to our back garden, loss of outlook, increased noise pollution, increased traffic congestion resulting in difficulties entering and exiting our property onto Knowsley Lane (there is already a high level of lorries using Knowsley Lane to enter Knowsley Business Park.

We believe there would be an adverse impact on nature, our garden and the land surrounding it is home to a wide variety of birds, bats, stoats, badgers and more recently the pink footed goose have landed in the fields opposite where they usually rest during their migration period.

Being a resident of Knowsley Village we believe if we were to lose all of the above as a result of proposed employment development this would alter the quality of life we enjoy at present living in a semi-rural location and would detract from the value of the property.

We plan to oppose any future planning applications should the land be released from Greenbelt based on the above grounds as well as the fact there is an abundance of empty retail premises on Knowsley Business & Ind Parks that could be utilised for estimated future employment needs.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

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5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature Mr Craig Brown & Mrs Kay Brown **Date** 12-11-14

Knowsley Local Plan: Core Strategy

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Keith Easton	
Job Title (if appropriate)	Apprentice Engineer	
Organisation (if appropriate)	Heroux Devtek	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

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Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I do not believe this proposal is sound. I use the Greenbelt Land everyday for recreational use. I will not be able to continue to use the land if this proposal goes ahead. I cannot see any viable alternative land to continue my hobbies.

I think this will be detrimental to my health and mental well being.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

This goes against Government guidelines which state that Greenbelt Land must only be used as a last resort.

The Greenbelt Land in question is not unused Land. It is being utilised by the community. There is plenty of brownfield Land available to use.

Continue on a separate sheet if necessary...

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5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



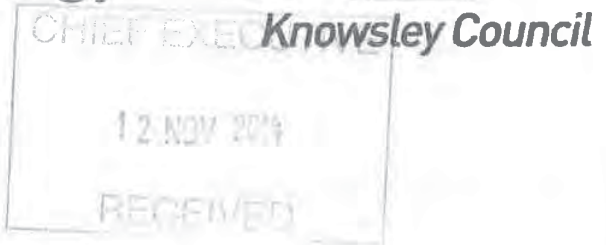
Date

1/11/2014



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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	KEITH SHARP	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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Continue on a separate sheet if necessary...

. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

1 I OBJECT TO GREEN BELT LAND BEING USED USE
BROWNFIELD SITES, ONLY.

2 HEALTH AND SAFETY ISSUES ALSO ALL ASPECTS
OF INFRASTRUCTURE
AMBULANCES
FIRE BRIGADE
POLICE
SOCIAL SERVICES
SCHOOLS, NURSERIES
HOSPITALS, G.P.S.
POLLUTION
SAFETY THROUGH TRAFFIC
ELDERLY WELLBEING

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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Date



Knowsley Council

Knowsley Local Plan: Core Strategy

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Keith Wooding	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B 1- YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055 to
M065

Policy Ref

CS1, to CS5,
SUE

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Generally, the Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

It is disappointing that these proposals to build on Greenbelt at South Whiston have only just come to light despite claims that due consultation process has been followed. Public meetings with the Inspector should be re-convened to take into account the views of local residents in accordance with the provision of the Government in the Localism Bill.

It can be seen that the Knowsley Local Plan does not take into account the latest data from the Office of National Statistics (ONS) in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014. Furthermore, the plan, its strategy and objectives contain many conflicting and ambiguous statements, with little in the way of tangible deliverables. Often making reference to flawed and outdated supporting documentation.

Delivery of Strategic Objectives is not considered to be SMART, outputs are not 'measurable' and therefore cannot be seen as being 'achievable'. This in turn would cast doubt on the 'realistic' criteria.

On a personal note if I had submitted proposals for work, of this standard with this many grey areas, undefined & unquantified benefits with little substantive basis, I'd be shot.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 11/11/14

PART B2 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055 to
M065

Policy Ref

CS1, to CSS,
SUE

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| c) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP (updated October 2014) the Secretary of State for Communities, which states "Planners must protect our Green Belt" and "This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development". See link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. It is clear that no exceptional circumstances exist in Whiston.

The North West does not have the Housing shortage that London and the South east has, and as such removal of Greenbelt should not be considered in this case.

This objection to the release of green belt has also been raised as Knowsley council have not proven that all practical alternatives & Brown Field sites have been explored, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley plan fails to give high enough priority and consideration to the empty housing stock within the borough. Knowsley have a very poor record of bringing empty and derelict housing back into use. No reference can be found to any consultation with local housing trusts. Knowsley have not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touches Liverpool at Huyton and the proposals at South Whiston will bring urbanisation up to the boundary with St Helens. Likewise the proposal at Cronton will bring Knowsley closer to Halton. This is NOT consistent with National Policy.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

c) No, I do not want to participate at any further public hearing

d) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

PART B3 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| e) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

In relation to KGBS14 South of Whiston. This policy is contrary to Strategic Objective 8, CS5, CS8 & CS21. Either the principles set out in SO8 are adhered to, or the land is used for development.

As stated in CS5 and CS8, it cannot meet both opposing policies. In fact C21 8.21-8.26 reduce to the point of being ineffective the relevance of CS3 and the requirement to release Green Belt land for development at all.

Given that there are prime areas of land around Prescot & Huyton that previously have been earmarked for housing yet lie undeveloped for a number of years indicates that Knowsley model for predicting the number of houses that will need to be built and the land required is flawed.

If the model was correct those areas would have been redeveloped. This proves that there is no justification to release Green Belt land except for Knowsley council financial benefit.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

e) No, I do not want to participate at any further public hearing

f) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

PART B 4– YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
g) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to the area south of M62. The proposed September modifications took the emphasis off investment in existing locations and placed it firmly on the 'new'. This indicates that Knowsley have little or no appetite to fill the empty space in Huyton Business park and empty units on nearby Fallows Way.

A ten minute drive round Huyton Business Park will show how much unused land or empty unit/buildings are available. The occupancy level is one area where there are inaccuracies in the supporting documentation.

The area south of M62 doesn't need more employment locations, it just needs the existing areas to realise their full potential. Proper effective management would achieve this whilst allowing other Core Objectives to be met.

Clearly the site has potential, as recently a developer acquired a large site for redevelopment.

For Fallows way, it is believed that two of the three units are un occupied at present. If the remaining occupant could be encouraged to relocate to Huyton Business Park, the whole of Fallows Way could be given over to housing. Reducing further the need to use Green Belt land. This would have the added benefit of reducing the number of large lorries that use Windy Harbour Road daily and hence congestion.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy** and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11 / 11 / 14

PART B5 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to KGBS14 South Whiston, there is very little mention of provision for new local centre, expansion or regeneration of existing local shops

As for 6.45, the policy is flawed and mostly irrelevant. This highlights lack of understanding of local issues. In turn this suggests that Knowsley have taken a 'one-solution-fits-all' approach. This element of the core strategy cannot be met.

Little mention is made of requirement for additional facilities such as health care or clinic, GP surgeries and dentist. Nursery and school requirements are also not described.

No reference was found to alternative policy documents that would detail these requirements, which suggests that no additional pre-school or school facilities are planned to meet huge increase in demand for services from such a large housing development. Similarly no additional health care provision. A number of strategic objectives will not be met

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 12/11/14

PART B6 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M112

Policy Ref

CS7

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| k) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| l) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With reference to KGBS14 South Whiston area.

Improvements to existing rail network, enhancements to stations.

As a regular train user from Whiston Station, Network Rail have been observed undertaking a passenger survey. This is with a view to CLOSE Whiston station. How does that help meet the transport policy? Clauses 1a, 1c, 2b, 3b, 3e

Also, and contrary to supporting documents, bus routes and times have been revised to the effect of after evening rush hour a minimal number buses are running. This will prevent a number of clauses from being met.

This removes choice, a key policy objective.

In reality this will manifest itself as people making greater use of personal car or cars. This will further bring the transport policy into disarray and have a negative impact on other perceived benefits & strategic policies

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Kirsty Leigh Easton	
Job Title (if appropriate)	Teacher	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

As a teacher I have a stressful job. I use the greenbelt land regularly to relax and plan my lessons in the tranquility of the countryside. I don't find this tranquility in the park land and don't see why I cannot continue to use the greenbelt land which was set aside for the benefit of the community on the outskirts of major cities. I have just bought a house in Knowsley and found a large choice of properties available. There is no need to use greenbelt land.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Inspector to say NO AS Plan is Not Sound.

This Plan was not positively prepared as it was against the wishes of the community and not enough time was allocated for objection.

This Plan is not justified as the Knowsley Population has decreased and the demand for housing has fallen. There are a lot of new developments in the area that are empty including the business parks so we don't need new ones, use the ones already built.

The Plan will not be effective within the community who would benefit more from the greenbelt land.

The plan is not consistent with national policy which states that Greenbelt land should be preserved. We have a right to our greenbelt land. Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

3/11/14



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	K Meredith	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055 to

Policy Ref

KGBS 14

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion, especially as most of my neighbours have only just heard of the proposals to build on Green Belt at South Whiston. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states “Planners must protect our Green Belt” see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. There is a Duty to Co-Operate which has not been considered.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton. This is not consistent with National Policy.
Continued on separate attachment.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

Date 13/11/14

Attachment – Objections to KGBS 14

<p>E1 To protect, enhance and manage the local character and accessibility of the landscape and countryside across Knowsley</p>	<p>Although some of the locations that would be released from the Green Belt contain areas that have been previously developed and other policies in the plan will seek to protect landscape character, each of the options could support the release of areas of greenfield land and have a negative impact on landscape character. As such, each of the options has the potential to have a negative impact on the objective. However, Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being ‘called in’ by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term. It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward</p>
---	--

Objections:

- The purposes of Green Belts in planning policy are clear – to protect the countryside from urban sprawl and to retain the character of towns and cities (Natural England, 2010). The proposal to release the Green Belt in South Whiston will exacerbate urban sprawl and its identity and character as a village community will be lost.
- As this is the last area of Green Belt within the South Whiston area the residents will no longer have access to the natural environment and all the benefits that the natural landscape exhibits.
- Those areas which are not to be included in the release from Green Belt – Old Wood and Big Water – would be severely impacted by the influx of residents to the proposed development. These features would be isolated amidst the proposed development and would be rendered unsustainable as a quality natural landscape and habitat for wildlife.
- Release of the Green Belt in South Whiston will contradict the purpose of Green Belt ‘to retain attractive landscapes, and enhance landscapes, near to where people live’.
- The local character and natural landscape of South Whiston stem from the early 12th century (Merseyside Historic characterization Project, 2011). The loss of this natural landscape held within the very last of the Green Belt in South Whiston would see the complete eradication of all the historic character that currently remains. The heritage of South Whiston would thus be lost for all current and future residents.
- Whiston is a ‘village’ with a village community. The proposed development would eradicate this village community as numbers would be too great for the community to be considered a village any longer.

E2	Each of the options could support the release of
----	--

<p>To protect, enhance and manage biodiversity, the viability of protected and endangered species, habitats, geodiversity and sites of geological importance.</p>	<p>land from the Green Belt to meet the Borough's housing and employment needs. A number of these Sustainable Urban Extensions contain Local Wildlife Sites and others are located in close proximity to them. In addition, as significant number of the Sustainable Urban Extensions also contain areas of priority habitat. As such, each of the options has the potential to have a negative impact on the objective, although it is acknowledged that other policies in the plan seek to protect biodiversity and features of ecological importance. Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being 'called in' by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term as it may not provide the certainty for the development industry required to guarantee the necessary investment to bring such sites forward for development.</p> <p>It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward.</p>
---	--

Objections:

- The protection, enhancement and management of the remaining area of ecologically isolated green belt will be rendered a belated and insufficient attempt to restore/protect/fix what has already been lost.
- Ecological dispersal and colonization of protected and endangered species will be prevented via fragmentation of vital habitat networks; inadequate dispersal of species will cause a local and regional extinction of nationally significant and endangered species. (Harrison and Bruna, 1999)
- Agricultural land adjoining Big Water and Old Wood is currently providing essential refuge for nationally endangered, red listed grey partridge, a victim species that relies on farming systems for its food source and habitat. (RSPB, 2014). There is a significant population throughout the agricultural land surrounding Big Water and Old Wood. Nationally 87% of the population of grey partridge has been lost since the 1970's, a direct result of habitat fragmentation and loss. It can be expected to deteriorate further owing to the potential loss of the agricultural green belt of South Whiston.
- The agricultural land adjoining Big Water and Old Wood provides refuge and food source for sky lark which has reduced nationally in population by 62%, overall farmland bird species which have reduced by 56%, and lapwings which have fallen in population by 76% since the 1970's (RSPB, 2014). This land is also the hunting, nesting and breeding grounds of buzzards and barn owls the numbers of which will be directly and severely impacted by the loss of the agricultural green belt in South Whiston. So too the population of their prey of field mice, voles and rabbits.
- Impact of human activity upon the remaining area of Greenbelt, i.e. Big Water and Old Wood after development has taken place would have a detrimental effect upon the quality of natural habitats and upon all local species. Increase in human population in addition to the close

proximity to the remaining Greenbelt will further degrade the natural environment as a result of vandalism and overall human impact.

- Without sufficient connectivity of green corridors the isolated patches of Greenbelt will suffer a loss of biodiversity and environmental quality. Current natural linkages connecting Stadt Moers to the South Whiston Greenbelt would be disconnected by the proposed development, preventing colonization and migration of species.
- Migrating water fowl e.g. Swans, Canadian Geese, Coots, Moorhens, Herons which frequent big water will diminish due to the encroachment of urban sprawl. This will have a detrimental effect upon the quality of Big Water fresh water habitat as they naturally manage the fresh water habitats.
- Had a full ecological and habitat survey been undertaken by KMBC it would have established, in summary, that the urban fringe woodland of Old Wood and Big Water, and supportive agricultural land, all within the green belt of South Whiston, was essential to the conservation of the abundance of wildlife and thus their sustainable future.

<p>E3. To adapt to climate change including flood risk.</p>	<p>The Strategic Flood Risk Assessment identifies that a small part of the southern section of the site is at risk of fluvial flooding. This risk of flooding will be exacerbated by climate change and this part of the site should only be considered for development as part of a sequential approach. It is recognised that the identified capacity of the site has been derived from the assumption that the portion of the site within Flood Zones 2 and 3 will be excluded from the developable area and unless this is the case, and the other identified mitigation measures are implemented, the proposals could have a negative impact on the objective and its sub-objective of reducing flood risk.</p> <p>The Preliminary Flood Risk Assessment indicates that the site also falls within an area that is susceptible to ground water flooding. Nevertheless, the PFRA does recognise that there is a lack of local information in relation to groundwater flooding and that the dataset used only identifies wider areas that may be at risk from groundwater flooding. Accordingly, the information on groundwater flooding is caveated by the acknowledgement that only isolated locations within the overall susceptible area are likely to suffer the consequences of groundwater flooding. Nonetheless, the proposals would result in a significant area of greenfield land being replaced with built development which may have an adverse impact on levels of surface water run-off if suitable measures are not implemented, such as sustainable drainage systems.</p> <p>The proposals would also result in the loss of a greenfield site that has the potential to provide habitat for species and help mitigate higher summer Temps associated with climate change.</p>
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Objections:

- Extensive inland flooding in 2007 focused attention on the economic and human costs of flooding (Pitt, 2008). Climate change is already causing heavier downpours, especially in winter, a trend that is projected to persist and increase flood risk (Defra, 2009). At present the 110 hectares of Green Belt in Whiston acts a soak for surrounding areas, The increased rainfall in Storm conditions(see below) will seriously challenge the ability of the existing main drains (AD51, map MMD-321747-D-SK-00-XX-0001) to handle such downpours. There is a distinct possibility that the M62 could flood if such a large area of Green Belt is put under concrete. Added to this the proposed development at Cronton (which in certain areas is lower than Whiston) would not be able to take any surplus rainfall.
- Properties in Foxshaw Close and Windy Arbour Close and the Green Belt to the rear of these properties are on a very high water table. These properties had to install extra drainage following the development of the Lickers Lane estate in the 1970's as water levels rose and caused flooding to property foundations. Clear spring water was found beneath floor boards which had to be drained in order to prevent subsidence of the properties and to prevent rising damp.

- Further development of the Green Belt to the rear of the properties will further impact the high water table and increase the probability of flooding to these properties and surrounding properties.
- No indication has been given as to the capacity of United Utilities to provide water treatment and sewage treatment, at the local water treatment works, for the proposed development.

<p>E4. To mitigate climate change including using energy prudently and efficiently and increasing energy generated from Renewable sources.</p>	<p>Each of the options would inevitably result in some carbon emissions and could therefore have a negative impact on the objective and its sub-objective. Other policies in the Core Strategy are likely to ensure that all new development is designed in a way to maximise energy efficiency and it is recognised that the proposers of the site have stated that the site may offer opportunities for decentralised energy systems due to the quantum of development proposed. It is however recognised that there is presently no certainty that such systems would be incorporated into the proposals for the site and it is noted that the Knowsley Renewable and Low Carbon Energy Options study (2009) considered that a purely residential development of the area would be unlikely to readily lend itself to a district heating opportunity. In addition, the site is not located within a ‘Priority Zone’ for renewable and low carbon energy as identified by the Liverpool City Region Renewable Energy Capacity Study (2009) and it is therefore unlikely to deliver a reduction in carbon emissions beyond those required by Local Plan policies. The proposals are likely to result in an increase in traffic in the immediate surrounding area. It is however noted that there are a range of local facilities and amenities that are readily accessible from sections of the site including primary schools, a GP and health centre and a local shopping centre on Greene’s road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opposite side of Windy Arbor Road and Huyton Business Park which may reduce the need to travel for work. Furthermore, both Options 1 and 2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, and taking into account the scale of development that would be likely to come forward on the site, it is considered that each of the options have the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of onsite facilities.</p>
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Objections:

- It is quite clear that the development of Green Belt in Whiston will have an overall negative effect on the aim to mitigate climate Change. The Sustainable and Low Carbon Development (5.183 SD32. CS22) removal of the developers need to meet the Sustainable homes/BREEAM standards will increase energy usage.
- The increase in Traffic in the area will increase carbon emissions and have a detrimental effect on Air Quality.
- The Industrial Estate mentioned on Windy Arbor Road has little effect on employment as the few factories that are occupied, have no need for more workers.
- There is also an acceptance that this development will not be suitable for energy generated by renewable sources. In addition, the removal of the requirement to achieve a certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.
- “The need to build more sustainable housing with a limited supply of land means that innovation is necessary but working towards sustainable communities relies on more than the achievement of zero carbon housing; its success will also be determined by the selection of appropriate locations for development”, Neil Williamson FLI, President Landscape Institute

<p>E5. To provide, conserve, maintain and enhance green infrastructure.</p>	<p>Although Options 1 and 2 would support the retention/provision of some areas of public open space, each of the options would result in the loss of substantial area of greenfield land which offers the potential to function as part of the Borough’s Green Infrastructure network and it is considered that each of the options would have a negative impact on this objective due to the area of greenfield land that would be lost. It is however acknowledged that there is only a low level of certainty over this impact of Options 1 and 2 on the objective due to their potential to retain areas of public open space & increase the quality of the accessible green infrastructure network. By contrast, there is a higher degree of certainty that Option 3 would have a negative impact on this objective as it would not offer the same level of protection to areas of Public Open Space.</p>
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Objections:

- The provision of parks and open spaces in deprived areas such as Knowsley is worse than in affluent areas. The removal of this area of Green Belt would severely impact the deprived residents of this area of Knowsley.
- The higher the quality of the green space, the more likely it is to be used. To build over 1500 houses on Best & Most Versatile Grade2 Agricultural land cannot enhance green infrastructure. Every one of the options would result in the loss of large area of essential open green space. This area of Green Belt is THE VERY LAST piece of Green Belt in South Whiston and as such is the highest quality of open green space in the South Whiston area.
- Open green space is essential to health and well-being especially for mental health and preventing and combating mental health issues. Knowsley MBC would be failing in it’s care of, and provision for, it’s residents suffering mental health issues should this area of Green Belt be developed.

<p>E6. To protect, manage and restore land and soil quality.</p>	<p>Although Options 1 and 2 would support the retention/provision of some areas of public open space, each of the options would result in the loss of a substantial greenfield site. It is also noted that the majority of the site is classified as Grade 2 Best and Most Versatile agricultural land and that parts of the site are presently within agricultural use. It is therefore considered that each of the options have the potential to have a significant negative impact on this objective and also on the sub-objective of directing new housing to previously developed land. There is a higher degree of certainty that Option 3 would have a negative impact on this objective as it could also result in development on the greenfield parts of the site that are existing areas of Public Open Space.</p>
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Objections:

- The majority of the site is classified as Grade 2 Best and Most Versatile agricultural land and has been farmed for many years. None of the options will meet the objective to restore land and soil quality. UK soils store over 10 billion tonnes of carbon in the form of organic matter. The size of this store means soil has a vital role to play in helping to combat climate change. “Preventing emissions from soil and exploring how to increase existing stores of soil carbon can make an important contribution to meeting the Government’s emission reduction targets and carbon budgets, introduced by the Climate Change Act 2008”. Defra, Soils Policy Team

<p>E7. To protect, improve and where necessary, restore the quality of inland, and estuarine waters.</p>	<p>The site is in close proximity to a number of bodies of water, including Big Water. Directing development to locations close to these features has the potential to adversely affect water quality unless adequate mitigation measures are adopted. It is however recognised that there is limited certainty about the impact of development in this location on the water quality. In addition, it is noted that each of the options could result in the remediation of any contamination on the site and thereby eliminate a potential source of pollutants for this watercourse. As such, the impact of each of the options on the objective is uncertain.</p>
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Objections:

- It is critical that this precious resource is managed properly to ensure that the needs of society, the economy and wildlife can be met and maintained in the long-term. Surrounding Big Water Lake with a vast housing estate of over 1500 houses must surely impact on the quality of water in the local area. The lake in this area is used for recreation and fished regularly by a local club, it is considered “Good Fishing” one of its advantages is its rural location. We have seen no mitigation of negative effects on water, suggested by Knowsley Council.

<p>E8. To protect, and where necessary, improve local air quality.</p>	<p>The proposals are likely to result in an increase in traffic in the immediate surrounding area but it is recognised that the extent to which this will impact on air quality is uncertain and the site is not within an Air Quality Management Area. It is noted that there are a range of local facilities and amenities that are readily accessible from sections of the site including primary schools, a GP and health centre & a local shopping centre on Greene’s Road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opp side of Windy Arbor & Huyton Bus Park which may reduce the need to travel for work. Nevertheless, these community facilities are some distance from the eastern and southern sections of the site and only the northern sections of the site are within 800m of Whiston railway st & not all of the site is in close proximity to the existing bus routes on Windy Arbor & Lickers Lane. The proposer of the site has also stated that the proposals would include on-site facilities, the provision of new bus routes through the site and that the development would be designed to encourage walking and cycling. Both Options 1 &2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, due to the number of trips that a development of this scale would be likely to generate, it is considered that each of the options has the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of on site facilities.</p>
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Objections:

- It is highly unlikely that a development of over 1500 houses would improve air quality especially if you take into account the level of traffic increase. The suggestion that walking to Greenes Road is an option for a non car owning elderly or young person in winter is a non-starter. Bus services are poor in Whiston at best and non-existent after 8pm at the southern end of Windy Arbor Road.
- “Our farmland and countryside can produce high-quality food and support wildlife when trees play a part in the landscape. We all breathe easier when there are beautiful woods in which to

relax and unwind. And yet the UK needs more trees. We are one of the least wooded countries in Europe and trees and woods continue to disappear from our landscapes”. *Woodland Trust*

- There is a need to reduce the need to travel by car and increase the use of more sustainable forms of transport. Economic activity rates and incomes are lower in Knowsley than the NorthWest average.
- There is a need to retain a greater proportion of retail expenditure within Knowsley to enhance the vitality and viability of the Borough’s town centres.
- 2 of the 15 conservation areas in Knowsley are included on the latest Heritage at Risk register;
- Access to areas of natural and semi-natural open space is poor in parts of the Borough;
- There is a need to conserve and enhance the natural environment recognising the importance of biodiversity.
- There is a need to secure and promote increased energy efficiency and renewable energy sources;
- There is a need to promote and secure more sustainable waste management.
- There is a need to consider the impacts of flooding and flood risk;
- The re-use of land should be promoted to minimise the take-up of greenfield land.

Source: Sustainability issues were derived from the baseline data gathered in 2008 – 2009 to inform the SA SD07 Scoping Report, Knowsley council

None of the Knowsley MB goals, above, will be achieved by releasing Green Belt.

“Air pollution is currently estimated to reduce the life expectancy of every person in the UK by an average of 7-8 months. The measures outlined in the strategy could help to reduce the impact on average life expectancy to five months by 2020, and provide a significant step forward in protecting our environment.” DEFRA The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

<p>E9. To use water and mineral resources prudently and efficiently.</p>	<p>Each of the options is unlikely to have any significant effects on the objective.</p>
--	--

Objections:

The objections would be largely in line with those made against E7 as follows:

- It is critical that this precious resource is managed properly to ensure that the needs of society, the economy and wildlife can be met and maintained in the long-term.
- Surrounding Big Water Lake with a vast housing estate of over 1500 houses must surely impact on the quality of water in the local area.
- The lake in this area is used for recreation and fished regularly by a local club, it is considered “Good Fishing” one of its advantages is its rural location. We have seen no mitigation of negative effects on water, suggested by Knowsley Council.

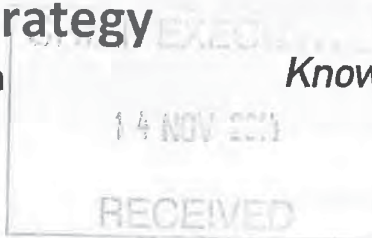


Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

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- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Lesley Dunn	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The proposals will result in more cars using the roads in the neighbourhood if over 1500 houses are built - at least one car per household.

This would inevitably affect the local air quality if the level of traffic increases. Bus services are poor in Whiston with ^{a stop in} early hours at the south end of Windy Arbor Rd. Therefore result in more cars on the road. In this situation air quality would not be improved.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

The measures outlined in the Strategy could reduce life expectancy due to air pollution.
The reuse of land should be promoted to minimise the take-up of green space and consider the environment and life expectancy.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

Nov 8/2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE
Knowsley Council

12 NOV 2014

RECEIVED

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MISS	
Name	Malika Dionne Pache	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

This proposal would not improve health and health inequalities. I believe this green belt land is used regularly by local members of the community and also visitors to the area. It is a calming atmosphere for locals. ~~of~~ Green spaces have been proven to help with mental health improvements as it promotes exercise and a calming experience. If this land is removed people who enjoy using this land will have no place similar to go. This green belt is not wasteland and ~~is~~ ^{is} in fact used and loved by the community.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

This proposal contradicts the recent government's statement stating that greenbelt land must be retained and only released as a last resort. There is plenty of ~~greenbelt land~~ brown belt land to use for these kinds of developments. Clearly releasing this land at this moment is not a last resort. There is more appropriate land that could be used.

Continue on a separate sheet if necessary...

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Signature



Date 1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	
Name	MARLE ORMOND	
Job Title (if appropriate)	Housewife	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

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Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
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| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I think it will damage the Whiston Community - we will not have enough schools doctors etc also as we don't have a great deal of green belt our children would be deprived now + in the future Also the amount of traffic is far too much now + the amount is more than enough to put up with.

Continue on a separate sheet if necessary...

If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

There is no reason to build on
Greenbelt there are enough
Brownfield + empty properties
in Knowlley Area.
Take into account guidance from
Eric Pickles on 16th Oct 2014 -
carry out up to date transport survey
Take into account population figures
from O.N.S. 2014.
Reconsider Public Inspection.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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Signature



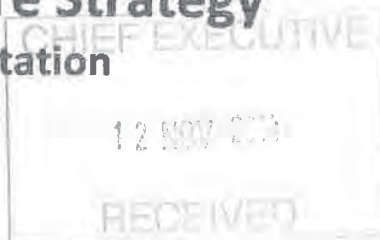
Date 1-11-14



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	MARK LUMAN	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

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Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KG3S14

Paragraph Ref

EC2

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I OBJECT TO EC2 BECAUSE OF TRAFFIC WHICH IS ALREADY EXTREMELY BUZY AT RUSH HOUR. MORE TRAFFIC AND MORE CONGESTION ALSO THE EXTRA POLLUTION WHICH WILL BE CAUSED BY THE EXTRA TRAFFIC. ALSO THE EFFECT IT WILL HAVE ON THE FLORA + FAUNA WHICH WILL DISAPPEAR.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

TO USE BROWN FIELD SITES FIRST THEN CONSIDER USING GREEN BELT ONLY AFTER THE BROWN FIELD SITES HAVE BEEN SUCCESSFUL

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



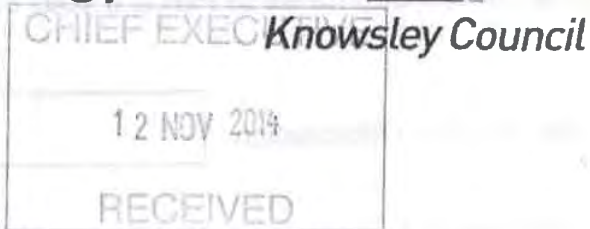
Date

1-11-14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



RETURNING THIS FORM

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	MARK JONES	
Job Title (if appropriate)	Technical Services SPECIALIST	
Organisation (if appropriate)	FUSITSU SERVICES	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The whole point of green belt sites is to protect the countryside from urban sprawl and ensure the natural character of towns and villages is not destroyed.

The proposed area of release is the last green belt site in South Whiston and the population will lose out on the ability to access the natural land and wildlife.

If the proposed areas of green belt are released and developed the isolated Big Water and Old Wood would be negatively impacted by the encroaching urban development, and wildlife such as birds, waterfowl and animals would face a loss of habitat and quality of the remaining land due to human interaction.

A full survey would conclude that the loss of the urban fringe woodland, surrounding farmland and other areas would severely affect the biodiversity of wildlife and their habitats.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Please take into consideration, before the release of greenbelt land, the comments made by Eric Pickles, who states, that green belt land must be retained and only be released when all other options has been exhausted.
All brown fields sites must be developed first before moving onto green belts.

Continue on a separate sheet if necessary...

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5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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Signature



Date 01/11/14

Knowsley Local Plan: Core Strategy

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Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	MAURICE STEELE	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref SUE Policy Ref KQRS 14 Paragraph Ref E 5

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

South of Whiston

- 1) Modification to show changed designation of land from Green Belt to Sustainable Urban Extension (for residential use).*
- 2) Modification to show changed designation of Fore Bank Lane cemetery from Green Belt to Urban Greenspace and Educational Land.*
- 3) Land of South of M62
Modification to show changed designation of land from Greenbelt to Urban Extension (for employment and Country Park uses)*

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Before
any development of the land to South of M62 I think all Brown field should be first built on. I don't feel that enough thought has been given to this when you look at the proposed plans it is obvious the amount of Building planned and the new roads required to support this will bring utter chaos to the area. Hospital, New homes where are shops. Public transport needed to sustain this. Show the public all the proposed Building plans. where the houses are going. the roads then let the public decide if the loss of all this Greenbelt is worth it, (BUT BEFORE) ANY OF THIS USE ALL BROWN BELT LAND FIRST.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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Date 1/11/2014



Knowsley Council

Knowsley Local Plan: Core Strategy

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Michael Humphreys	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

South of
Whiston

Policy Ref

KGBS14

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). **If you wish to support the modification, please use this box to set out your comments.**

S1 – With regards to this statement I do not see any evidence in the proposed modifications which will bring employment into the region beyond the initial building stage. The building stage does not guarantee that the local building trade will benefit as corporate house building companies have established suppliers and will not necessarily benefit local building trade. If you consider that Knowsley's own website advises that apprentices be paid the statutory minimum wage I don't see this having an impact on the economy to justify the building of a minimum of 1503 houses.

S3 - With no plans to increase police budgets only to decrease based on the national plan for the police. In fact a rapid population growth will increase the cost of services such as police.

S4 – Knowsley shows no sign of being able to communicate the basics of ripping out the greenbelt in its own local area so I have little hope that they will make a contribution to improving community decision making.

S5 – Knowsley has one of the poorest results for emphysema, breast-feeding take up rates, childhood tooth care (I could go on) with no consideration for expanding the local NHS facilities it would either put a massive drain on the existing services or leave the new inhabitants with no facilities to use such as GP's, dentists and childcare. There is no plan in place that shows we will have confidence in our council to adapt and implement the necessary. This news article demonstrates the type of mismanaging that continues today
<http://www.liverpoolecho.co.uk/news/liverpool-news/councillors-anger-18m-unspent-funding-7883509>

3. Continued

E1 – by building on the greenbelt we will no longer have access to the landscape and countryside across Knowsley as the remainder of the Greenbelt is on the Derby Estate which is private property with very little access.

E2 – I simply don't understand how you can justify this statement as you plan to cover it in concrete.

E3 – I can find no record of Knowsley council accessing the flood records through the Environmental Agency held in Warrington which shows upon building Foxshaw close and Windy Arbor Close faced difficulty due to wet soil, flooding and landslides. Though there are no legal requirements to do this surely when making plans to develop an area ground conditions are a priority!

E4 – E11 there is no evidence to suggest this will have a positive effect on the area by removing green land in favour of housing and concrete.

EC1 – The governments own Portas report shows that more and more people are moving away from shopping experiences similar to those found on Greene Lane in Whiston Village. With little investment being put into these areas they are starting to look tired and unkempt.

EC2 - several attempts to revitalise the centre of town in Prescot have failed and we continue to see shops close and left empty. This in no way would attract people to an area leaving this proposed estate with little interest.

EC3 – the proposed occasional shop within the plan does not make a thriving business to employ 3000 people does it? And the proposed warehouse which I assume (like many of the facts in this document) will employ people on or near minimum wage I do not see how they would be able to afford some of this housing.



14/12/21

2/2/21

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

The council has failed to release brownfield sites in a timely manner for development such as the 2 demolished leisure centres in Huyton and Prescott. Further investigation as to why Green belt is now favoured over all brown field should be investigated.

Knowsley Council have failed in their due diligence to inform the local population as to the proposed plans. They themselves have accused Royal Mail of failing to deliver notifications however there has been no pressure or charges brought for tampering with the mail. It has only been a local campaign that has seen the population informed.

The 5 day consultation last year when very few people came shows how poorly informed people were in comparison to all the forms you are receiving now in protest to it. I would recommend a new consultation of the local people.

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Signature



Date

14/11/14



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	MICHAEL JAMES	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	-	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

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Name and/or Organisation

M. JAMES

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Continue on a separate sheet if necessary...

10 / 11 / 2014

Dear Sir

I am writing to strongly object to the removal of land in South Whiston from the Green Belt in order to meet the Borough's needs for new homes and/or jobs. This land has been accessible to the public for recreation for many years. My family have benefited from this accessibility and my own children have had access to these open space areas of Halshead Park and the large lake. I now have two grandchildren who I would hope will also benefit from these open areas.

I have always assumed that the purpose of Green Belt land was to provide open areas for people living in congested urban environments. Your Core Strategy Plan seems to be at odds with the very essence of Green Belt policy. I cannot believe that there are not other areas of the Borough outside of Green Belt land that would

be more suitable for your proposed developments.

The building of over 1,500 dwellings on this land seems to me to be excessive and would have considerable detrimental effects in this area of the Borough. The sheer number of dwellings proposed would undoubtedly put considerable extra strain on local services and amenities. The probable addition of over 1000 extra cars in the immediate vicinity would not help the congestion and confusion that already exists on the roundabout of Junction 6 on the nearby M 62.

Yours faithfully



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

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Signature



Date

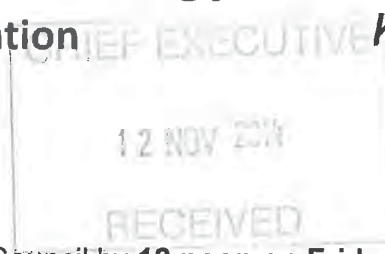
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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	mrs	
Name	Michelle Zeman	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
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| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I object because of increased traffic, Pollution and noise, overloading local services, loss of Farming land, loss of wildlife, loss of village community resulting in an urban sprawl.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

To use Brown Field sites For Development only when these Developments have been SuccesFull Then Consider using Greenbelt land For Development.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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Signature



Date

1/11/14

[REDACTED]

From: Victoria McMullen [REDACTED]
Sent: 21 September 2014 16:30
To: [REDACTED]
Subject: Knowsley Lane , Huyton green belt project removal of greenbelt

Follow Up Flag: Follow up
Flag Status: Flagged

To Whoever this concerns

As Local residents

We Completely and absolutely object to you lifting the greenbelt area so that you can build on the farmlands of knowsley lane, there are plenty of houses new and old build property's in the Knowsley area that are not even getting sold and Kings business park is 3/4 empty , the new build propertys on knowsley lane and hillside are empty.

Instead of building houses and units to be left rotting and wasted why don't you invest in knowsley in a leisure park similar to victoria park Halton it certainly increased the footfall to widnes and spending , plus it gives people of all ages and abilities exercise and will give the children of knowsley something better then houses and football pitches and hanging around the local shops.

Please do not to hesitate to contact ourselves to discuss our complaints , one very disappointed in KMBC resident

Mr and Mrs McMullen

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 13 October 2014 09:10
To: [REDACTED]
Subject: FW: Knowsley Lane , Huyton green belt project removal of greenbelt

From: Victoria McMullen [REDACTED]
Sent: 22 September 2014 20:58
To: [REDACTED]
Subject: RE: Knowsley Lane , Huyton green belt project removal of greenbelt

Thank you Mr.Howarth for your response

It is very kind of you to take the time to read and take on board our concerns,has you can appreciate we are a young family and we want to see investments in Parks and leisure for young and older people there is an amazing park called Victoria park in Halton and everyone uses it they even have day services with learning disability and Mental health hiring bikes out for a couple of pounds which helps with enabling a person to do work plus it helps with fitness of all ages I suggest yourself and parks and leisure do visit this place, I believe the people of Knowsley will benefit with these facilities long term has you can appreciate health is a key factor in Knowsley and through regular exercise this will benefit people and take some pressure off the nhs long termplus children of all ages have something to do and exercise , I pass several schools daily and see obesity is rife which will in the future impact on services, but when I look around there isn't much for kids to do in Knowsley and to use the leisure and cultural park can be expensive to use if parents are struggling Victoria park has tennis courts , skater ramps 2 parks bowling for older people and green land Ive never seen any trouble there at all.
I have been a knowsley resident all my life but I am disapointed to just see see houses and buisness parks and football fields has a Knowsley resident I'd like to see more investment in parks and leisure and thinking outside the box not just taking away greenbelt areas to build yet more houses that people cannot afford to buy.

We love our greenbelt areas and should try to maintain and keep them , there are plenty of new houses that are not being sold the estate I live on the houses that should be for sale go up for rent has nobody is buying them and the business park that will be over the road from the proposed business park is half empty .

We do appreciate your response very much and I think its only fair for you to know the reasons why we are disappointed into what is being proposed.

With Kind regards

Mr and Mrs McMullen



Knowsley Council

Knowsley Local Plan: Core Strategy

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12 NOV 2014

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MISS.	
Name	MYRA HANKEY.	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

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Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

K9BS14

Policy Ref

E1-E9

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

This plan would bring extra traffic to the area. There is already too much in the village already windy about roundabout isn't capable of coping with more traffic. More houses means more cars, families have more than one car, when the round about is out of action windy about road is grid locked!

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

It is impossible, Whiston will never cope with the amount of traffic, new homes will bring schools can't cope now, so all the extra children will put extra strain on the services

Take note of EMC Pickles Oct 14. no green belt should be built on until all Brown Fields sites have been built on.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date 11/14

[REDACTED]

From: [REDACTED]
Sent: 13 October 2014 09:09
To: [REDACTED]
Subject: FW: Greenbelt Land on Knowsley Lane

From: Patricia Dobson [REDACTED]
Sent: 24 September 2014 09:49
To: [REDACTED]
Subject: Greenbelt Land on Knowsley Lane

Dear Mr Howarth

Pattens farm on Knowsley Lane is targetted by the local council to be used for building dwellings and employment property. We believe there is plenty of disused land which would be far more suitable within the borough and that it is not right that they are taking green belt land that has been in the area for over 200 years. We think this is disgraceful and hope you will be attending the meeting on the 9th October 2014 to support the people who have voted for you to support them.

I would like to hear your views with regard to the proposal of the council taking this land.

Yours faithfully

Patricia Dobson
Michael Bailiff

[REDACTED]



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

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- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Patricia McDonald-Holmes	
Job Title (if appropriate)	Printmaker Artist / Teacher	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Patricia McDonald-Holmes

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS14

Policy Ref

E3

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

- There is a need to consider the impacts of flooding in general and flood risk; **'The re-use of land should be promoted to minimise the take-up of greenfield land'**.

Source: Sustainability issues were derived from the baseline data gathered in 2008 – 2009 to inform the SA SD07 Scoping Report, Knowsley council

- Extensive inland flooding in 2007 focused attention on the economic and human costs of flooding (Pitt, 2008).
- South of the M62, the watercourse becomes Chapel Brook and is joined by a number of tributaries, including Fox's Bank Brook. South of this the watercourse is known as Ochre Brook and it flows southwards for approximately 1km before being met by Dog Clog's Brook and turning to flow westwards. Fox's Bank Brook and Dog Clog Brook both drain the low lying area to the east of the A5300 that lies between Whiston and Rainhill in the north and Ditton in the south.

"The areas generally affected by Flood Zone 3 are: Settlements along Dog Clog Brook; Settlements along Fox's Bank Brook;"

http://www.knowsley.gov.uk/pdf/EB15_StrategicFloodRiskAssessment-Level2.pdf

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- To prevent flooding possibilities in the future **YOU** must Insist that brownfield sites are developed before considering GreenBelt Land release as the impact on our area and community will be disastrous.
- Strategic Flood Risk Assessments need to be completed to identify areas at risk of flooding in the proposed building sites!.
- Put back any GreenBelt release until the end of the plan period, and even then consider all other areas first.
- GreenBelt release is the last resort and not the first response to take.

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- a) No, I do not want to participate at any further public hearing
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Signature



Date 13/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	PAUL CROUCH	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I object to the removal of land at Whiston from the Green belt for the following reasons
a lot of people use the parts of open green spaces and value them

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

use Brown sites !!

Continue on a separate sheet if necessary...

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Signature



Date

1/11/14



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Paul Marshall	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Paul Marshall

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

All relevant

Policy Ref

All relevant

Paragraph Ref

All relevant

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Consultation Process

I would like to make clear that I wholly reject the assertion made in section 1.3 of the guidance notes of this form (CS Mods Response Form and Guidance PDF), which states

"Comments are sought specifically on the proposed modifications to the Plan. This is because parts of the Plan which are unchanged have already been subject to consultation and discussed at the Examination hearings. "

I reject this on the grounds that the Council's claims that enough people were informed of the consultation process are unfounded, with myself and hundreds if not thousands of others being completely unaware of the Consultation Process or the Local Plan even existing until after these important consultation periods had ended.

Also although a lot of information may exist at the specified website address, a lot of residents are unaware of it and some do not even have access to or use the internet in the first place, which is what the entire consultation process is more or less designed around, excluding further people from the process.

If the council has not properly informed its constituents of the consultation process, then there is no way that that process can then go on to be legally compliant or sound. Huge swathes of people concerned and affected by the Local Plan have not been informed of the consultation until after key phases were completed and therefore those phases cannot be considered to be valid.

CONTINUED....

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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Signature [REDACTED]

Date 7th of November 2014

Further objections to the Local Plan include the following points:

WILDLIFE

The wildlife on the greenbelt site must be protected at all costs, but no guarantees have been made about this. At the public consultation in Whiston, a video of which can be found here: <https://www.youtube.com/watch?v=d3WuxRrS1ow&list=UUTaqTuHMu4mtYyoTYUCyMrQ>

██████████ of Knowsley Council stated that the council's own survey commissioned to assess the area found that there is significant ancient woodland and valuable wildlife within the greenbelt. He then went on to state that they would 'like' for developers to develop on the areas that have less value in this respect, but later in the same video Knowsley Council's representatives admitted that any details on where would be developed and where wouldn't would not be a decision for the council but for the developers.

In other words, there is no guarantee that the wildlife and woodland would be protected, and what is certain is that at least part of it (the supposedly 'less valuable' parts) would be lost.

POPULATION

Knowsley's population has been in decline for several decades and there is no solid evidence that this is going to change. Even population projections from Knowsley Council's own data (Sub National Population Projections Update 2014) offer contradicting guesses and predictions of growth far lower than that would necessitate the exceptional circumstances which would justify removing the land in question from greenbelt status. There are already significant numbers of empty properties all over the borough, as well as plenty of brownfield that remains undeveloped as well as business properties that remain vacant.

GREENBELT STATUS

The council attempts to assure us that the plan is only to remove the protected land out of greenbelt status, and that this doesn't necessarily mean it will be developed. It will be a lot more likely to be developed once it has lost greenbelt status protections afforded to it. The idea that taking the status away is in itself an innocuous act is incredibly disingenuous.

BROWNFIELD AND ECONOMIC VIABILITY

The Government Secretary of State Eric Pickles recently went on record to reiterate that councils must protect greenbelt at all costs and may only consider developing greenbelt land in extremely exceptional circumstances. Such circumstances have not been proven by the Local Plan, and not enough has been done to source alternative land for development. Economic Viability of brownfield land should not be a concern of the council, which does not own the greenbelt. Simply stating that developers would prefer the more lucrative economic prospect of greenbelt development over developing on brownfield does not fall into exceptional circumstances or a last resort justifying its release from. The council states government has forced its hand to develop greenbelt, and Government says don't develop on greenbelt. If even government and the council cannot agree on who is the driving force behind this plan, then how can the plan be considered legally compliant and sound?

In conclusion, I oppose the legal compliance and soundness of the local plan on the following grounds:

- No guarantees of protection to wildlife or heritage land from developer's future proposals.
- Seriously flawed consultation process which failed to involve the majority of the affected constituents within the consultation period.
- Insufficient evidence that the population of Knowsley will increase to the degree that necessitates the scale of development considered.
- Insufficient evidence that other sites were properly considered, or that the Government's instruction to protect greenbelt at all costs has been adhered to.

The law states that Greenbelt cannot be developed except as a last resort, and the circumstances which constitute this have not been proven by any stretch of the imagination. If the government is against greenbelt development, if the council was reluctant to use the greenbelt in its plan, and if the people themselves are against the development, how can it go ahead? Do developers now have the power to govern our country and our communities? Does economic viability trump both the law and the will of the people?

[REDACTED]

From: paula day [REDACTED]
Sent: 14 November 2014 08:35
To: Knowsley Local Plan
Subject: Objection to Knowsley Local Plan
Attachments: 001.jpg; 002.jpg; 003.jpg

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it concerns

Please see attached my completed form objecting the early release of Green belt within Whiston. I do believe in development as we all develop however the local plan is about number of homes not how these contribute and integrate to Knowsley. Housing development is not just about money but on the spirit of a town and community integration agenda. This local plan just screams Knowsley Council only cares about the money, keeping develops happy and an easy life! Is this easy for you?

I'm objecting as I believe the plan is not sound based on sustainability and best interest of the community. The development is to large and is an easier solution than working with other reasonable sites across Knowsley, Prescott, Whiston and Huyton.

This plan meets the needs of the government and council but not the people who matter. Occasionally some hard decisions need to be made and stand up to the Government Inspector saying Knowsley Matters. We live here not them.

Many kind regards

Paula

Paula Day [REDACTED]

[REDACTED]

Sent from Windows Mail

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Paula Day	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Paula Day.

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M0001

Policy Ref

1

Paragraph Ref

1.3

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I would like to object to the early release of the Whiston & Cronton Greenbelt area for large scale housing development. These changes are not sound on the basis of positively prepared or justified.

These modifications are not justified based on the figures of the housing need. The evidence base is not strong enough to support the proposed number of new housing. For Whiston alone the proposed household build is an increase of 20% (based on information supplied at public meetings). This type of development has significant impact on infrastructure and services which are not suitable. Furthermore, this size of development will lead to Whiston being over-developed with limited green space for the population size.

These modifications are short-sighted and limit further development when other reasonable alternatives have been exhausted. The local plan illustrates a rushed implementation without any robust measure of the impact or consequences to public health.

Furthermore, the sustainability of the local plan is poor. Currently, sustainability within Whiston is limited. Services have closed, over-crowded of health and education and poor quality infrastructure impacting on quality of life within Whiston.

The early release of the Whiston greenbelt will not lead to community or lifestyle that is suggested but will segregation of 2 communities.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

The local plan needs to reinstate the use of brown sites and industrial empty sites. Furthermore a reduction of the number (if not remove completely) of houses to be built for the Whiston & Cronton Greenbelt. Therefore retaining more green belt for recreational and educational use for the population growth. The use of the investment from the sale of green belt back into the existing area of Whiston.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

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Signature



Date 13/NOV/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

RECEIVED

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	PAULINE JONES	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS14

Policy Ref

Paragraph Ref

EJ

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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I object to this plan as areas not released from Green Belt (Big Water + Old Wood) would result in an influx of residents ~~to~~ trying to use the small area and thus render this natural landscape unsustainable for wildlife.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Please take account of Eric Pickles (Oct 14) comments.

No Green belt land should be used until all available "Brown field" sites have been used, including the old BICC sites on Manchester Road.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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Signature



Date

1/11/14

[REDACTED]

From: Pete Lamble [REDACTED]
Sent: 01 October 2014 11:02
To: Knowsley Local Plan
Subject: Proposed residential development on Green Belt land in Whiston.

Follow Up Flag: Follow up
Flag Status: Completed

Mr P. Lamble
[REDACTED]

1st October 2014.

To Whom it may concern.

Re: Proposed residential development on Green Belt land in Whiston.

I write to register my objections to the above proposal.

Yet again we see councils giving up Green Belt land for various schemes, in this case housing development. There is so little 'Green' space in this country that people are still able to enjoy and Knowsley Council are consider depleting it even further. Apart from the impact on wildlife, we continue to build on flood plains with the inherent damage that ultimately causes, not to mention the chopping down of trees and hedgerows that allow this planet to breathe. A lot of people would consider this an act of vandalism.

There are people who will not be happy until until the whole country is concreted over.

I wonder if anyone at the planning offices has even bothered to look at all the brownfield sites in Knowsley on which once stood factories and various other developments that are unlikely ever to be used again. The infrastructure such as roads and utilities are usually in place as well to support what once stood on the site so cutting down on those costs as well.

I appreciate that people need housing but the world also needs its 'lungs' and developments such as this will cause immense damage if they continue at the same rate as in the past. When I look at the map of Knowsley, it is not difficult to pick out areas such as derelict housing and factories which could be utilised for new housing without having to concrete over 'Green' spaces.

I doubt if anyone will take any notice of this letter but at least it's getting it off my chest. If however anyone does actually read it, I would appreciate some kind of reply to my concerns.

Yours

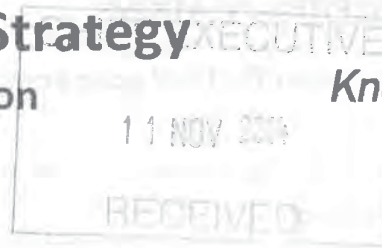
P. Lamble.



Knowsley Local Plan: Core Strategy EXECUTIVE

Proposed Modifications - Consultation Representations Form

Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	PETER BRADEN	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref
To improve services amenities

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I OBJECT TO THIS PROPOSAL BECAUSE IT IS NOT SOUND WITH THE REASON BEING THERE IS NOT ENOUGH LOCAL SERVICES + AMENITIES IN THE AREA TO COPE WITH THE DEMAND ON WHICH AN INCREASE OF PEOPLE (AVERAGE 4 PER FAMILY x 150000 HOUSES IS POTENTIAL 60000 PEOPLE.

THE LOCAL SERVICES I MEAN ARE THE HOSPITAL WHICH IS ALREADY STRUGGLING WITH CURRENT NUMBERS. THE LOCAL SCHOOLS WHICH HAVEN'T GOT ENOUGH PLACES FOR THE CURRENT NUMBER OF LOCAL KIDS. TRANSPORT LINKS IN/OUT OF WHISTON VIA TRAMBUCK ISLAND WOULD COST THE COUNCIL MORE MONEY FOR MAINTENANCE + CONGESTION WOULD INCREASE CAUSING H+S ISSUES. Continue on a separate sheet if necessary... POTENTIAL MORE ROAD TRAFFIC ACCIDENTS

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I DON'T THINK IT SHOULD GO AHEAD AT ALL, BECAUSE THERE IS NO WAY YOU COULD PREVENT THIS PROBLEMS FROM ESCALATING WITH THE INCREASE OF POPULATION.

IF TARGETS HAVE TO BE MET, THE ONLY WE KNOWN BROWN SITES SHOULD BE USED TO HELP ACHIEVE YOUR TARGETS. ALL THE BROWN FIELD SITES COULD INCREASE YOUR HOUSING NEEDS BY AT LEAST 75% OF YOUR TARGET NO.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

2 NOV 14.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

RETURNING THIS FORM

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title MR		
Name MONAGHAN		
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

PETER MONAGHAN

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KGBS14

Paragraph Ref

EC2

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

DUE TO THE INCREASE IN TRAFFIC ONTO WARBUCK ROUNDABOUT THE INCREASING STRAIN ON THE DRAINAGE SYSTEM AND HUGE STRAIN ON THE AREAS LAND TO ACT AS A SOAK AWAY TO DISPERSE RAIN WATER WHICH THE GREEN BELT LAND IS PROVIDING AT THE MOMENT, THE RISK OF FLOODING TO THE PROPERTIES NOW PRESENT AND ANY NEW DWELLINGS IS CONSIDERABLE.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

THE GREEN BELT LAND IN SOUTH WHISTON SHOULD NOT BE REMOVED FROM THE GREEN BELT. AND ALL PROPOSED BUILDING RESIDENTIAL AND INDUSTRIAL SHOULD BE UNDERTAKEN ON BROWN FIELD SITES WITH THE KNOWSLEY BOUNDARY..

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE **Knowsley Council**

12 NOV 2014

RECEIVED

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	PHILLIP JENNINGS	
Job Title (if appropriate)	FINANCIAL ADVISOR	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

PHILLIP JENNINGS

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I THINK IT IS NOT SOUND BECAUSE ALL THE IMPROVEMENTS THAT THE PROPOSALS SUGGEST WILL HAPPEN ARE UNPROVEN. NO GUARENTEED PLAN HAS BEEN PUT FORWARD AND TO SACRIFICE GREEN BELT LAND WITHOUT A GUARENTEE IS UNACCEPTABLE

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

THE GREEN BELT LAND MUST NOT BE USED AND DEVELOPED AT ANY COST, ESPECIALLY WHEN THERE ARE PLENTY OF LAND THAT COULD BE USED AS AN ALTERNATIVE. I MOVED TO THE AREA TO LIVE NEAR TO THE COUNTRY SIDE, TO DEVELOP THE LAND WILL EFFECTUVELY PUT ME IN THE MIDDLE OF A LARGE HOUSING ESTATE. TARBOCK ROAD ROUNDABOUT AND WINDY ARBOR ROAD IS ALREADY UNABLE TO COPE WITH TRAFFIC ALSO, IN VIEW OF KNOWSLEY COUNCIL'S PAST RECORD ON JOB CREATION AND OTHER ISSUES THAT HAVE BEEN IN THE NEWS, THE PLANS THAT THEY SUGGEST ARE BOUND TO FAIL, BECAUSE THEY ARE NOT CAPABLE OF IMPLEMENTING THESE CHANGES.

Continue on a separate sheet if necessary...

ALSO, IF THE HOUSES ARE CONSTRUCTED BY THE SAME DEVELOPER AS THE ONE WHO BUILT THE HOUSES AT LABLES RETAIL PARK THEY WILL LOOK HIDEOUS AND CHEP.
PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature 

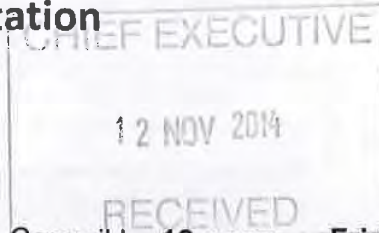
Date 1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	PHILIP JONES	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I wish to object to this plan as the release of the last Green belt within the South Whiston area will exacerbate our lovely village and its identity and character as a village community will be lost forever.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

To make this plan sound, please take into consideration the comments from Eric Pickles (Oct 14).

All Brownfield sites used before considering "Green belt".

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/14



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Philip Williamson	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	██████████ ██████████ ██████████	
Postcode	██████████	
Telephone Number	██████████	
Email Address	████████████████████	
Preferred Method of Contact	email	

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

All relevant

Policy Ref

All relevant

Paragraph Ref

All relevant

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Consultation Process

I would like to make clear that I wholly reject the assertion made in section 1.3 of the guidance notes of this form (CS Mods Response Form and Guidance PDF), which states

"Comments are sought specifically on the proposed modifications to the Plan. This is because parts of the Plan which are unchanged have already been subject to consultation and discussed at the Examination hearings. "

I reject this on the grounds that the Council's claims that enough people were informed of the consultation process are unfounded, with myself and hundreds if not thousands of others being completely unaware of the Consultation Process or the Local Plan even existing until after these important consultation periods had ended.

Also although a lot of information may exist at the specified website address, a lot of residents are unaware of it and some do not even have access to or use the internet in the first place, which is what the entire consultation process is more or less designed around, excluding further people from the process.

The 'signage' around the proposed sites for removal of the green belt, which amounts to a single A4 sized notification tied to a nearby lamppost along the whole perimeter of the sites do not sufficiently inform local residents who live outside the 200m 'notification zone'.

CONTINUED....

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

If the council has not properly informed its constituents of the consultation process, then there is no way that that process can then go on to be legally compliant or sound. Huge swathes of people concerned and affected by the Local Plan have not been informed of the consultation until after key phases were completed and therefore those phases cannot be considered to be valid.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature

Date

Further objections to the Local Plan include the following points:

WILDLIFE

The wildlife on the greenbelt site must be protected at all costs, but no guarantees have been made about this. At the public consultation in Whiston, a video of which can be found here:

<https://www.youtube.com/watch?v=d3WuxRrS1ow&list=UUTaqTuHMu4mtYyoTYUCymrQ>

Jonathan Clark of Knowsley Council stated that the council's own survey commissioned to assess the area found that there is significant ancient woodland and valuable wildlife within the greenbelt. He then went on to state that they would 'like' for developers to develop on the areas that have less value in this respect, but later in the same video Knowsley Council's representatives admitted that any details on where would be developed and where wouldn't would not be a decision for the council but for the developers.

In other words, there is no guarantee that the wildlife and woodland would be protected, and what is certain is that at least part of it (the supposedly 'less valuable' parts) would be lost.

POPULATION

Knowsley's population has been in decline for several decades and there is no solid evidence that this is going to change. Even population projections from Knowsley Council's own data (Sub National Population Projections Update 2014) offer contradicting guesses and predictions of growth far lower than that would necessitate the exceptional circumstances which would justify removing the land in question from greenbelt status. There are already significant numbers of empty properties all over the borough, as well as plenty of brownfield that remains undeveloped as well as business properties that remain vacant. In addition to this, the council's bigger neighbour Liverpool, which contains far more social, cultural and industrial infrastructure is planning to increase the number of dwellings by far more than the projected population growth to attract people to the area. No doubt a number of those people will come from Knowsley and other surrounding councils.

In the local plan no consideration has been given to the necessary social and green infrastructure that is required to accommodate the new dwellings. In Halewood in particular, most of the primary schools are already oversubscribed and would be unable to accommodate the hundreds of children that would come with 1124 new dwellings. Similar arguments apply to the local GP and dentist surgery's.

GREENBELT STATUS

One of the five purposes of the green belt is the 'prevention of urban sprawl into the countryside', while perhaps not being legally classified as 'countryside', Yew Tree Farm on lower road is regarded by many of the residents of Halewood as being part of the countryside, and perhaps not having a history going back a hundred years, it does have a historical value to the people of Halewood. The idyllic countryside feel of the Yew Tree Farm shop and coffee barn will now be ruined by being directly opposite to a large housing estate instead of the farmland that currently faces it.

The council attempts to assure us that the plan is only to remove the protected land out of greenbelt status, and that this doesn't necessarily mean it will be developed. It will be a lot more likely to be developed once it has lost greenbelt status protections afforded to it. The idea that taking the status away is in itself an innocuous act is incredibly disingenuous.

BROWNFIELD AND ECONOMIC VIABILITY

According to the government's own Natural Land Use Database there is enough brownfield sites in the country to accommodate over 1.5 million new dwellings and still more for commercial and industrial development. Clearly there is not yet a requirement to build on arable land that is required to feed a growing population.

The Government Secretary of State Eric Pickles recently went on record to reiterate that councils must protect greenbelt at all costs and may only consider developing greenbelt land in extremely exceptional circumstances. Such circumstances have not been proven by the Local Plan, and not enough has been done to source alternative land for development. Economic Viability of brownfield land should not be a concern of the council, which does not own the greenbelt. Simply stating that developers would prefer the more lucrative economic prospect of greenbelt development over developing on brownfield does not fall into exceptional circumstances or a last resort justifying its release from. The council states government has forced its hand to develop greenbelt, and Government says don't develop on greenbelt. If even government and the council cannot agree on who is the driving force behind this plan, then how can the plan be considered legally compliant and sound?

In conclusion, I oppose the legal compliance and soundness of the local plan on the following grounds:

- No guarantees of protection to wildlife or heritage land from developer's future proposals.
- Seriously flawed consultation process which failed to involve the majority of the affected constituents within the consultation period.

- Insufficient evidence that the population of Knowsley will increase to the degree that necessitates the scale of development considered.

- Insufficient evidence that other sites were properly considered, or that the Government's instruction to protect greenbelt at all costs has been adhered to.

The law states that Greenbelt cannot be developed except as a last resort, and the circumstances which constitute this have not been proven by any stretch of the imagination. If the government is against greenbelt development, if the council was reluctant to use the greenbelt in its plan, and if the people themselves are against the development, how can it go ahead? Do developers now have the power to govern our country and our communities? Does economic viability trump both the law and the will of the people?

In a recent Knowsley town council 'Local Plan' meeting, the planning officers stated that the original plan, that only included brownfield sites to be developed, was rejected by the Planning Inspector due to a number of brownfield sites being 'unviable'. Presumably this means commercially unviable to the housing developers who own the land, i.e. there is insufficient profit for them to make in building on the land (or less profit to be made than building on the green belt). Might I suggest that if an organisation not driven by profit, in fact driven by supplying residents with their housing needs, such as a local authority, purchase this land and build social housing on it. This would result in little, or no green belt being developed to meet the area's needs and would prove the council is working for the residents benefits rather than working for the benefit of corporations such as Redrow Homes and Taylor Wimpy and wealthy landowners such as Lord Derby.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	R Martin	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I object
Because we have enough Brown field sites so we do not need to build on Green belt

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I object to the plans to build on Green Belt.
We do not have enough diversity in greenery in this area as it is. So building on Green Belt would only diminish what variety we do have. Please think about the effect on wild life, think about the bees and the butterflies. This country is expected to get wetter. So concreting over fields will cause more runoff in to local rivers and streams causing flooding.

Continue on a separate sheet if necessary...

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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1 / 11 / 14

From: [REDACTED]
Sent: 02 October 2014 22:18
To: [REDACTED]
Subject: FW: Ms Rachel Freeman, [REDACTED]
Importance: High
Follow Up Flag: Follow up
Flag Status: Completed

From: Rachel Freeman [REDACTED]
Sent: 01 October 2014 16:36
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Green Space
Importance: High

Hello [REDACTED]

Yes, I am emailing with regards to KMBC's Local Plan. Can you please take this to the Council please?

I am literally sickened to receive the letter from KMBC Policy Manager, Jonathan Clarke regarding the release of the Knowsley Lane green belt land. Apparently there is a need for houses and offices so I've been told. How can this be the case when there has already been development on the Hillside Estate accessible from Knowsley Lane? Aren't there empty houses there waiting to be filled.....and space for further development? Yes, I believe there is which I saw with my own eyes when I took a walk there a couple of weeks ago.

What are the plans for the patch of land on the corner of Primrose Drive and Knowsley Lane, where Knowsley Training Centre used to occupy? I suppose more houses hey? Why is there a need for office space, when you have King's Business Park again not occupied to full capacity?

Where is the evidence that supports the need for this development? Show me the research and proof that states hundreds of people want to move to this area and therefore require this development to go ahead.....Show me the evidence that supports the need for more office space. For some reason, I don't truly believe that this is a need....more like a want. More like a stab in the dark to see if it works and hundreds of people flock to Knowsley! What a gamble if there is not sufficient evidence, and who accepts responsibility if it all goes pear shaped?!!!!

What if this beautiful piece of land/natural habitat is removed forever by this development and the houses and offices do not get occupied? What then? I have been informed that 450 houses are to be built, whether that means purely on Knowsley Lane Green Belt or between the 10 areas, I don't know. What I do know is this.....once that land becomes a housing estate / industrial park and based on an average of two cars per household, the congestion and pollution will be diabolical for all residents directly on/off Knowsley Lane, Prescott, Knowsley Village, Huyton. Even accessing / exiting the M57 could be a nightmare.....DOES ANYONE TRULY CARE ABOUT US LITTLE PEOPLE..... MONEY TALKS HEY?!

Don't the people responsible for this development realise that Knowsley lane is already very busy as it is with the amount of traffic that goes through in either direction, and their bright idea is to bring more houses, cars..... POLLUTION AND CONGESTION!!!!

For the people who are making this decision, does it affect YOU or where YOU live? Is YOUR home life going to be turned upside down? How long will this development take to completion? How would YOU like it, or even cope with it if this was going to happen opposite YOUR home, where you loved living as a direct result of living opposite a very calming healthy piece of land where nature occupies.

Before this development reaches completion you expect us to literally be overlooking a building site, with cranes, diggers, and a whole host of very noisy, large vehicles. Dirt blowing over into our homes/gardens / vermin etc.

Don't you think that this will directly impact on residents' health and wellbeing like mine and my neighbours for example? AGAIN, DO YOU CARE?

My understanding of any large organisation is that they have a corporate social responsibility to uphold SUSTAINABILITY as it's in the public interest to do so. Isn't environmental protection one of KMBC's responsibilities??? Yet this organisation will be responsible for removing this land from the green belt and destroying it. Is this not a huge contradiction?

I bought my house 3 years ago in 2011. The land search showed no development plans and yet a few months previous to moving in, a petition to save this land had been in action. Regarding this new development, this is the first letter I have received. Why have I not been informed sooner about this?? Going back to 2011, had I known about the development or should I say destruction of this natural habitat, I would have reconsidered buying my home directly opposite this green belt! I believed for a long time that Knowsley Council did care about its residents.....and now, I feel totally cheated!!

I'm sure it comes as no surprise that I am one of many, many residents OPPOSED to this development. We are joining forces and will try to save this unique and much loved/appreciated area of North Huyton.

Rachel

Knowsley Lane resident



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE
17 OCT 2014
RECEIVED

Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR & MRS	
Name	Ray Harrison & Lesley Harrison	
Job Title (if appropriate)	Retired Receptionist	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Knowsley Local Plan - Public Consultation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

LOCAL PLAN

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We live here in Knowsley, and we have since 1980. We bought our Council property in Homefarm Road, and decided to buy, because of the beautiful Green Belt area around us. We have brought two daughters up here. It is a lovely place to live, and was once known as Knowsley Village, and that's why most of us decided to live here, the wildlife around us, the facilities we have here, our two small schools, our medical centre were adequate for our village. We now know why our village became a Town, to introduce this Unity Development Plan. We do not want this passed, because this is a small area, and to build Council property's here, although we know how much these properties are needed, it would destroy our area. There would be a health and safety risk, our roads in and out, from Knowsley here, would be overloaded and dangerous, for our children, and elderly residents

Continue on a separate sheet if necessary...

need: Objection to Green Belt being sold off.

We have many elderly residents who live here, we need to support them. If this Plan was to be passed, and hopefully it won't, the areas we live in now, would need a lot of work, for instance, a complete new drainage system, our roads and drains are always flooded when we have our bad weather. The medical Centre, were I work, just about copes with the residents living here now. Our schools are only small Primary schools. We have never had a Secondary school, our children have always had to travel on buses, outside the area. Also our fishing areas, that provide a peaceful tranquillity for our residents and visitors. Our squirrels and birds, and wildlife we enjoy, would all go. You have to live here to appreciate the beauty around us. The Knowsley Industrial areas, and Kirby surrounding us, have plenty of space to build Council properties. Why Not use these areas.

Please do not Destroy, what was once our Village
We do not want to be Removed from Our Green Belt Areas
There are Plenty of Non Green Belt to sell to the Government.
(Why is everything, always about Money) Please think out of this
Box for once, and do the Right Thing. Those of us living, P.T.O

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Signature

Date 13.10.2014

near the Green Belt Areas, is the fact it
is the home of all our Wildlife & Nature,
Without the Green Belt, there will be no nature.
Please Re-consider these Green Belt-areas

Yours Sincerely



4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Instead of selling of our Green Belt land.

Build on Knowsley & Kirby Industrial Areas

Also all the land opposite the 'Showcase Cinema'
off the East Lanes
(which was for properties to be built) that is still
empty. Why not build there.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature

Date 13.10.2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE **Knowsley Council**

12 NOV 2014

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	RONALD PRESCOTT	
Job Title (if appropriate)	PRODUCT CONTROL	
Organisation (if appropriate)	CONVATEC	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

^{MOSS}

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

THERE HAS NO BEEN ANY PROPER CONSULTATION WITH THE LOCAL PEOPLE
THERE HAS BEEN NO CONSIDERATION FOR THE LOCAL GREEN BELT, WHICH WAS DEPLETED OVER THE LAST 30 YRS
THIS PART OF MERSEYSIDE NO SHORTAGE OF WASTE LAND IN THE PRELOT AREA.
GREEN BELT IS THERE FOR PEOPLE TO ENJOY AND STOP URBAN EXPANTION.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature [REDACTED] Date 1.11.14.



Knowsley Local Plan: Core Strategy Proposed Modifications - Consultation Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	ROY EASTON	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is ? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I HAVE USED THE GREENBELT LAND HERE IN WHISTON FOR MY ENTIRE LIFE (OVER 50 YEARS). I PLAY FOOTBALL, I WALK MY PRESENT DOG FOR THE LAST 5 YEARS AND MY PREVIOUS DOG FOR 18 YEARS UNTIL SHE DIED IN 2008. I FEEL ITS AGAINST MY HUMAN RIGHTS TO TAKE AWAY THIS GREEN BELT LAND, ~~WHICH~~ (I USE DAILY) TO WALK THE DOG, AS ONCE HOUSES ARE BUILT ON THIS LAND THERE'S NOWHERE ^{ELSE} TO GO!

Continue on a separate sheet if necessary

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I FEEL THE INSPECTOR SHOULD NOT
AGREE TO THE SALE OF GREEN-BELT
LAND, AS THERE IS ENOUGH BROWN BELT LAND
THAT COULD BE USED 1ST.

Continue on a separate sheet if necessary

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date

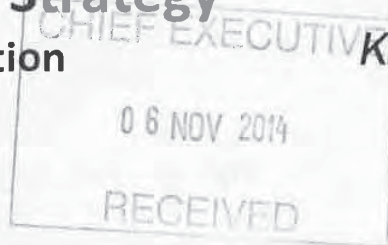
01 - NOV - 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	ROY HARDMAN.	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation MR R HARDMAN

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref WHISTON
STH.
MILS. Policy Ref 1/2c. Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Continue on a separate sheet if necessary...

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- 1) INFORMATION SHOULD BE PROVIDED THAT A LAY PERSON CAN UNDERSTAND PLAIN / SIMPLE ENGLISH.
- 2) DUE TO THE LACK OF JOB OPPORTUNITIES WE FEEL MORE HOUSING IS NOT REQUIRED AS PEOPLE HAVE NO REASON TO MOVE INTO THE AREA.
- 3) DUE TO HISTORIC MINE WORKINGS THE LAND MAY BE UNSTABLE AND DANGEROUS TO BUILD ON.
- 4) THE DESTRUCTION OF THE GREENBELT / OPEN COUNTRYSIDE WOULD DESTROY THE HABITAT OF WILD LIFE ON THE PROPOSED LAND, I THOUGHT THE COUNCIL HAD A DUTY TO PROTECT WILDLIFE.
- 5) THE LOSS OF A TREMENDOUS AMOUNT OF GREENBELT / AGRICULTURAL LAND THAT PRODUCES FOOD.
- 6) THERE WOULD BE A MASSIVE STRAIN ON LOCAL INFRASTRUCTURE DUE TO OVER CAPACITY PUTTING MORE STRAIN ON SCHOOLS, DOCTORS, PUBLIC TRANSPORT AND THE NHS.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

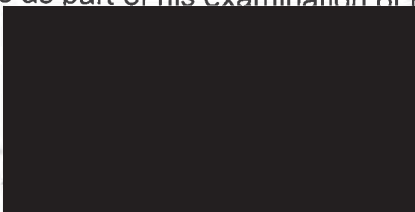
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature




Date

6/11/2014

UNACCEPTABLE HIGH DENSITY/ OVER DEVELOPMENT OF THE SITE WOULD LOSS THE OPEN ASPECT OF THE NEIGHBOURHOOD, REMOVING THE BUFFER BETWEEN WHISTON AND THE MOTORWAYS M57/62.

- 8) THE ROAD NETWORK IS ALREADY AT BREAKING POINT AT TIMES, MORE CARS WILL ONLY ADD TO THE CURRENT PROBLEM.
- 9) NEW HOUSEHOLDS ON GREENBELT LAND WILL CREATE NEW INCREASED CARBON EMISSIONS FROM INCREASED POPULATION, TRANSPORT ETC. ETC, WHERE THERE WAS ONCE GREENBELT. THIS IS CONTRARY TO THE GOVERNMENT'S POLICY TO REDUCE GLOBE WARMING.
- 10) INCREASE IN TRAFFIC WOULD INCREASE NOISE, POLLUTION AND INCREASE IN CO² GASES WHICH COULD EFFECT THE HEALTH OF THE POPULATION IN WHISTON.
- 11) COUNCIL SERVICES ARE UNDER STRAIN AT PRESENT, DUE TO BUDGET CUTS, INCREASING THE HOUSING STOCK IN KNOWSLEY WOULD ONLY INCREASE THESE PRESSURES.
- 12) I URGE THE COUNCIL NOT TO CONSIDER BUILDING ON THE GREENBELT OR FARMLAND BUT TO UTILISE THE NUMEROUS BROWN FIELDS SITES. THIS WOULD MORE THAN MEET THE CURRENT HOUSING DEMANDS IN THIS AREA.

WHEN GREENBELT LAND HAS BEEN DEVELOPED, ITS LOST FOR EVER.



6/11/2024.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	SUSAN BENTLEY	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	-	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I WISH TO OBJECT TO THE PROPOSAL - PRIMARILY ON THE ENVIRONMENTAL GROUNDS BUT ALSO BECAUSE OF THE EFFECT IT WILL HAVE ON THE VILLAGE, ITS OCCUPANTS AND ALSO THE DETRIMENTAL EFFECT ON WILDLIFE. RELEASE OF THE GREENBELT WILL CONTRADICT THE PURPOSE OF THE GREENBELT "TO RETAIN ATTRACTIVE LANDSCAPES, AND ENHANCE LANDSCAPES, NEAR TO WHERE PEOPLE LIVE". AS THIS IS THE LAST AREA OF GREEN BELT LAND WITHIN SOUTH WHISTON, WE THE RESIDENTS WILL NO LONGER HAVE ACCESS TO THE NATURAL ENVIRONMENT AND ALL THE BENEFITS THAT THIS NATURAL LANDSCAPE BRINGS. THIS WILL ALSO IMPACT ON THE IDENTITY AND CHARACTER OF THE VILLAGE WHICH WILL BE LOST FOREVER AND CANNOT BE REVERSED. ONCE BUILDING COMMENCES, ANIMALS SUCH AS VOLES, BEES, BATS, FOXES, HEDGEHOGS, SQUIRRELS AS WELL AS THE HUGE VARIETY OF BIRDS WILL HAVE LOST THEIR HABITAT.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

THERE ARE MANY SOLUTIONS TO THIS PROBLEM.

USE THE NUMEROUS BROWNFIELD SITES IN THE AREA. I

APPRECIATE USING BROWNFIELD CAN BE EXPENSIVE
HOWEVER NO PRICE CAN BE PUT ON MOST WILDLIFE

USE EMPTY HOUSES THROUGHOUT THE BOROUGH. COUNCIL
CAN PUT CHARGING ORDERS ON THEM.

BUILD BUSINESS UNITS ON LAND ALREADY DESIGNATED
CLOSE TO TESCO'S IN PRESCOT

Continue on a separate sheet if necessary...

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5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/14

[REDACTED]

From: [REDACTED]
Sent: 22 October 2014 21:20
To: [REDACTED]

Core strategy policies reference CS5, SUE1, SUE2. Modifications Schedule reference M078, M168 and M272. Kirkby is surrounded by Industrial estates that are not being fully utilised, the current industrial estates should be surveyed and utilised fully before building further new ones. Taking land out of green belt just to have units standing empty seems stupid when there are more than enough units and land on the current industrial estates. Alchemy still has land up for sale and what about utilising the old Kodak site. This would provide space for a number of units and would tidy the industrial estate up.

I object very strongly to the above proposal

susan smith

[REDACTED]

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Suzanne Lewis	
Job Title (if appropriate)	Receptionist	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The councils philosophy about new housing correlating to economic development and population erosion is fundamentally flawed. See first para in document KGBS14 SA objected ECI (above) outlining 'none of the options for land to the south of which include an employment element. May encourage further investment in the area sustaining local employment and also potentially bringing new jobs into the area is not a "sound" reason for economic development and productivity of business as stated in document KGBS14 SA objective ECI

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Use the latest figures from the office of national statistics to carry out an up to date housing requirement.
Traffic Management surveys taking into account the existing peak time traffic and extra traffic of at least 2500 vehicles.
Develop empty properties and brownfield sites first.
Put green belt release back until last and consider all other options first
Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 1st / 11 / 14



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Vitti Osborne	
Job Title (if appropriate)	Parish Clerk	
Organisation (if appropriate)	Cronton Parish Council	
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	[REDACTED]	

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Cronton Parish Council

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M078, M168
and M272

Policy Ref

CS5 ,SUE1, SUE2,
SUE2c

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The proposed modification is not sound and inconsistent with the NPPF Green Belt Policy.

The Parish Council **objects** to the removal of the sites (South of Whiston and Land South of M62) from Green Belt to Sustainable Urban Extension.

It is the Parish Council's policy to safeguard green belt. The National Planning Policy Framework states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that a key attribute of land in the Green Belt is its openness. The removal of the sites from Green Belt is totally against the Green Belt policy and its purposes.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

To protect the countryside, brownfield land in the Borough should be used for the proposed developments.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 6 November 2014

RESPONSE DICTATED
TO G. WILDGOOSE
IN OSS RECEPTION
ON 13/11/14 DUE
TO INABILITY TO
COMPLETE FORM AS A
RESULT OF VISUAL
IMPAIRMENT

13/11/14

Core Strategy

consultation



Knowsley Council

13 NOV 2014

RECEIVED

Knowsley Council by **12 noon on Friday 14 November**
can not be accepted.

- > By email: LocalPlan@knowsley.gov.uk
- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	YVONNE OWENS	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M168

Policy Ref

SOUTH
WHISTON
& LAND SOUTH OF M62

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

- Concerned about traffic on Lickers Lane, Foxs Bank Lane, Windy Arbor Road arising from development.
 - Need to protect woods on Lickers Lane.
 - No pavement on Foxs Bank Lane and Cumber Lane is poor.
 - Traffic is getting worse, impact from developments
 - Concerned about principle of Green Belt release
 - Need to look at empty houses and brownfield land first + empty other properties (retail, etc)
 - Concerned about affordability for first time buyers
→ houses at Cables in Prescott not selling
 - Lack of need for additional employment given vacant premises elsewhere in Knowsley, including Prescott
- Continue on a separate sheet if necessary...*
- Poor public transport links – particularly buses & trains to Prescott town centre
 - limited capacity of hospital & health clinic & schools

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- ~~Not~~ releasing Green Belt - should be looking at empty properties, empty premises and brownfield land first.
- Green Belt retained to promote healthy activities such as parks.
- Recommend Country Park promotes employment and follows the example of the Wildflower Centre.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

[Redacted Signature]

Date

13/11/19

10 POLICY CS5

Representations Relating to Policy CS5: Green Belt (excluding those relating to proposed SUEs – see chapter 17)

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS5 001	1	108	Chris Edge, Barton Willmore for Junction Property Ltd
POLICY CS5 002	1	295	Jane Aspinall, Bellway Homes
Total	2		

From: Chris Edge [REDACTED]
Sent: 14 November 2014 08:34
To: Knowsley Local Plan
Subject: Knowsley Local Plan Core Strategy and SPD: Representations on Behalf of Junction Property Limited
Attachments: CS Mods Response Form.pdf; SUE Consultation- 20 10 14.pdf; Counsel's Opinion-Policy SUE2-Nov 2014.pdf; Repls -Proposed Mods-Final- 07 11 14.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

Please find attached representations on behalf Junction Property Limited (JPL) to the following consultation documents:

1. Representations to the Knowsley Local Plan: Core Strategy: Proposed Modifications - Consultation (representations form, representations report and Counsels Opinion - 3 pdf files); and
2. A Representations Form in respect of the South of Whiston (residential) and Land South of M62 (employment and Country Park) SPD (1 pdf file).

Please acknowledge receipt of this email and the attachments in due course.

Kind Regards,

Chris Edge
Associate

Planning . Design . Delivery
bartonwillmore.co.uk



Please consider the environment before printing this email



We are exhibiting at the Farm Business Innovation Show 2014!
Find more information on our stand and seminar [here](#)

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Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title		
Name		Michael Courcier
Job Title (if appropriate)		
Organisation (if appropriate)	Junction Property Ltd	Barton Willmore
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Junction Property Ltd

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

See
attached

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

Date

RE: THE KNOWSLEY LOCAL PLAN: CORE STRATEGY AND POLICY SUE2

ADVICE

1. I am asked to advise on an issue which has arisen in respect of the latest proposed form of policy SUE2 of the Knowsley Local Plan Core Strategy.
2. My Instructing Planner is acting on behalf of clients who are promoting the development of land South of Whiston and South of the M62 in Knowsley. Both areas of land are proposed to be taken out of the Green Belt and allocated in the Core Strategy as Sustainable Urban Extensions (“SUE”).
3. The policy contains some detail about how applications for planning permission in those (and other) SUEs will be treated. This largely consists of referring to issues that would be material considerations in any planning decision and giving cross-references to other plan policies. Masterplans are to be prepared, as are Supplementary Planning Documents.
4. Part 2 of policy SUE2 would provide that “Indicative considerations applicable to the sustainable development of each SUE are listed at Appendix E ‘Sustainable Urban Extension Allocation Profiles’”. However, Appendix E gives very little information. For each of the SUEs in which my client is interested, the appendix gives details of site location, size and capacity and then refers to flood zones, wildlife sites, urban green space and the need to connect to extant urban development. Importantly, appendix E is introduced with a statement that whilst

the appendix sets out key planning constraints and opportunities, the items listed are not exhaustive and other considerations are likely to apply.

5. Part 3 of policy SUE2 states that for each SUE, the Council will prepare a Supplementary Planning Document (“SPD”) which will set out a proposed spatial framework, together with “further details of development and infrastructure requirements”.
6. I am asked whether there is a risk that the proposed SPDs would be unlawful. I think that there is. I say that for the following reasons.
7. The Town and Country Planning (Local Planning) Regulations 2012 set out, rather tortuously, what documents can and cannot be SPDs. They do so in a most convoluted way.
8. Regulation 2 of the 2012 Regulations sets out a definition of “Local Plan” as being any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv) or 5(2)(a) or (b), and requires such documents to be prepared as a development plan document. For some unknown reason, that definition is repeated in identical terms in Regulation 6.
9. The 2012 Regulations define an SPD as any document of a description referred to in regulation 5 (except an adopted policies map or a statement of community involvement) which is not a local plan. For all practical purposes, that means that only a document which falls within the scope of Regulation 5(1)(a)(iii) can be an

SPD. No other document can be an SPD because it will either (i) not be within the scope of Regulation 5 at all, or (ii) be within the scope of Regulation 5 but is a local plan: see *R (RWE NPower Renewables Limited) v Milton Keynes BC and another* [2013] EWHC 751 (Admin) at [28].

10. A document does not come within the scope of Regulation 5 at all if it merely repeats Development Plan policy for background information or for clarity of presentation and Regulation 5 is concerned with *new* statements of policy: *RWE NPower* at [67].
11. The difficulty is caused in this case by the vagueness of what the Development Plan leaves as the potential content of the SPD. The warning that the information in the plan and its Appendix E is not comprehensive runs the real risk that new statements could be set out in the SPD for the first time and it cannot be said that the SPD would simply repeat the Development Plan policy for clarity or background. So much is, I think, clear from the introductory words of caution in Appendix E and the generality of the content of policy SUE2 itself.
12. If that is so, one has to consider whether the SPD might contain provisions which fall within the definition of a local plan. It is clear that the SPD would not contain new site allocations because that is an issue about which policy SUE2 is sufficiently clear. There is therefore no need to consider Regulation 5(1)(a)(ii), aspects of (iv) or 5(2)(b) any further.

13. Regulation 5(1)(a)(i) applies to documents which contain statements about “the development and use of land which the local planning authority wish to encourage during any specified period”. The Courts have emphasised the references to encouragement and to a specified period: *Miller Homes Limited v Leeds City Council* [2014] EWHC 82 (Admin) at [24]¹. There must be a real risk, given the current terms of the Core Strategy, that the SPD would contain new statements which fall within this classification.

14. Further, Regulation 5(1)(a)(iv) has the effect of providing that a document will be a local plan and has to be prepared as a DPD if it contains statements about “development management policies, which are intended to guide the determination of applications for planning permission.” The Courts have held that the important consideration is whether the policy is designed to regulate the use of land: see *RWE NPower* at [75] and *Miller Homes* at [37]. Given the indications in the Core Strategy of what the SPD might deal with, there must be a real risk that the purported SPD would contain new statements of policy which regulate the development of the SUEs.

15. In short, the only document which could lawfully be an SPD connected to policy SUE2 would be one which fell within the scope of Regulation 5(1)(a)(iii) of the 2012 Regulations, namely a document containing statements about “any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i)”. I do not believe that it can be said that SPD would be bound to fall within this

¹ It should be acknowledged that this case is the subject of an appeal to the Court of Appeal which has a date for a hearing fixed in March 2015.

category, given that policy SUE2 part 3 states that the SPD will contain a spatial development framework and further details of development and infrastructure requirements. It seems to me that the draft Core Strategy envisages the SPD going beyond what is within the lawful scope of an SPD.

16. I therefore conclude that on the basis of the presently proposed terms of policy SUE2, there is a very real risk that any purported SPD would go beyond the lawful scope of an SPD and would enter territory which can only be covered by a Development Plan Document.

17. Indeed, the matter goes further than that. The lack of clarity in the proposed policy itself means that the policy itself may be unlawful. That is because part 3 of policy SUE2 vaguely refers to the provision of “further details of development requirements” being set out in the SPD. That approach, depending upon what those words intend and the proposed content of the SPD, runs the risk of falling foul of the principle that a Development Plan Document cannot choose to exclude from it policy provisions which the plan maker intends to guide decision-making: see *Westminster City Council v Great Portland Estates* (1985) AC 636 at page 674E where Lord Scarman said:

“If a local planning authority has proposals of policy for the development and use of land in its area which it chooses to exclude from the plan, it is, in my judgment, failing in its statutory duty.”

18. I accept that SPDs can be used to prescribe further detail to a policy set out in the DPD², but the vagueness of part 3 of SUE2 means that it cannot be said that SUE2 prescribes the policy requirements at a general level and the SPD would only set out further detail. I think the wording of SUE2 opens the risk that an SPD might contain new statements of policy, not foreshadowed in the Core Strategy and which would not be tested by any examination of their soundness.

19. I trust that I have dealt with all of the matters upon which my view was sought. If I can be of any further assistance, then my Instructing Planner must not hesitate to contact me in Chambers.

MARTIN CARTER
20th October 2014.

Kings Chambers
Manchester – Leeds – Birmingham.

² E.g, *Simplex (GE) Holdings Limited v SoSE* [1988] JPL 809; and *Watson v Essex CC* [2002] EWHC 669 (Admin).

RE: THE KNOWSLEY CORE
STRATEGY AND POLICY SUE2

ADVICE

Michael Courcier MRTPI



KNOWSLEY LOCAL PLAN CORE STRATEGY EXAMINATION
PROPOSED MODIFICATIONS TO SUBMISSION DOCUMENTS
REPRESENTATIONS BY BARTON WILLMORE
ON BEHALF OF JUNCTION PROPERTY LTD
NOVEMBER 2014

1 Supporting Representations

1.1 Junction Property Ltd (JPL) supports most of the proposed modifications now being suggested by the Council.

1.2 JPL welcomes in particular the following proposed modifications for the reasons given in evidence to the hearing sessions:

MO42 The removal of the Sustainable Urban Extensions from the Green Belt and their allocation for development as part of the spatial strategy identified in Policy CS1 and its accompanying text.

MO55 Acceptance of the Sedgefield method to calculate the five year housing requirement as part of Policy CS3 and its accompanying text (also MO56A, MO56B, MO65).

MO59 Setting out the circumstances which would trigger a review of Policy CS3. (However JPL considers that this should be a Main Modification because of its importance to the soundness of the Plan rather than a minor modification as currently suggested).

MO76	Inclusion of the reference to very special circumstances as part of Policy CS5.
MO78	Removal of the Sustainable Urban Extensions from the Green Belt as part of Policy CS5.
M112	Confirmation that measures to mitigate carbon emissions and improve air quality will only be sought " <i>where appropriate</i> ".
M157	Confirmation that the release of the Sustainable Urban Extensions will no longer be delayed until the longer-term.

2 Representations Objecting to Specific Proposed Modifications

2.1 M168: New Chapter 6A on Sustainable Urban Extensions

2.1.1 JPL welcomes most of the principles set out in Policies SUE1 to SUE2c. In particular it supports the following:

- the immediate release of the sustainable urban extensions to meet identified development needs;
- the development of the South of Whiston site for between 1500 and 1800 dwellings (depending on whether of the Council owned land currently identified for a cemetery extension is included in the development area);
- the development of the land South of the M62 for employment development; and
- proposals must demonstrate a comprehensive approach to site development and infrastructure provision, including the matters set out in paragraph 6A.18.

- 2.1.2 JPL however **OBJECTS** to the third part of Policy SUE2 where it says that the masterplan required under the policy to accompany any planning applications for the site should "*accord*" with development plan policy "*and any associated Supplementary Planning Document.*" There is of course no objection to the principle that the masterplan should accord with development plan policy. However the development plan should not impose a requirement that the masterplan for a site must "*accord with*" the proposed Supplementary Planning Document. Such a requirement would effectively incorporate the supplementary planning document into the development plan policy as lack of accord with it would create conflict with Policy SUE2 itself. This is wholly inappropriate because supplementary planning documents are not subject to the same rigorous statutory procedures and testing as development plan policies.
- 2.1.3 Development plan policies only receive the status accorded to them under Section 38(6) of the 2004 Act after they have been independently tested and examined, and found to meet the tests of soundness set out in national policy. They are also subject to very exacting and lengthy procedures for stakeholder and public involvement and consultation. In contrast, supplementary planning documents are not the subject of any independent examination or testing against the tests of soundness. Moreover they are not required to undergo the same rigorous requirements for stakeholder and public involvement and consultation. Because of these differences, planning law gives development plan policy and supplementary planning documents very different statuses in decision-making
- 2.1.4 Section 38(6) of the 2004 Act requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Under this section of the Act, a supplementary planning document has only the status of a material consideration to which regard should be given. It is not development plan policy where there is an expectation

of accordance unless material considerations indicate otherwise. As such, a proposal which accords with the development plan but is not in accordance with a supplementary planning document would still receive the presumption in favour under Section 38(6). The proposed modification seeks to reverse this position established by statute. The same would apply to the national policy position, and in particular the presumption in favour of sustainable development under paragraphs 14, 196 and 197 of the NPPF.

2.1.5 The proposed supplementary planning documents for the sustainable urban extensions have not, of course, been prepared yet. As such, it is not known what matters they will cover or whether their policies and proposals will be consistent with national policy and guidance, especially in respect of viability which is so important to the delivery of the Core Strategy as a whole. In such circumstances, it is wholly inappropriate for Policy SUE2 to require planning decisions to accord with them. We note in this respect that the Council has suggested other proposed modifications that remove any requirement for proposals to accord with supplementary planning documents. A similar change should be made here.

2.1.6 To assist the Inspector, we attach Counsel's Written Opinion which confirms that the provisions of Policy SUE2 so far as they relate to the proposed Supplementary Planning Documents would be potentially unlawful and may be capable of successful challenge in the Courts.

2.1.7 For these reasons we consider that the proposed modification in this respect fails the tests of soundness and would be potentially unlawful.

2.2 M169 and M190: Policy CS 15 on Affordable Housing

2.2.1 The proposed modifications make a distinction between the levels of affordable housing required on sites within the current urban area (10%) and on Sustainable Urban Extensions (25%). Proposed Modification 190 says that this distinction is

because the Knowsley Economic Viability Assessment (EVA) "*suggests*" there is a generally higher level of development viability in the proposed Sustainable Urban Extensions than in the existing urban areas.

- 2.2.2 JPL considers that the proposed policy requirement for sustainable urban extensions has not been properly justified by viability evidence. As such, it does not accord with national policy.
- 2.2.3 The National Planning Policy Framework (NPPF) states (paragraph 173) that pursuing sustainable development requires "*careful attention*" to viability and costs in plan-making. It emphasises that plans must be deliverable and to achieve this, "*the (allocated) sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.*" The Framework adds that to ensure viability, the costs of any requirements likely to be applied to development "*such as requirements for affordable housing, standards, infrastructure contributions or other requirements*" should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing developer to enable the development to be deliverable.
- 2.2.4 The Knowsley EVA fails to undertake the type of exercise required by national policy to justify an affordable housing target. The tables at pages 186 to 188 only examine the impacts of individual policy requirements, and no conclusions are reached about the cumulative impact of the policy requirements. Nonetheless, if the impacts of individual policies in Tables 7.30 to 7.32 are added together, it is clear that a 25% affordable housing requirement would not be viable on most large housing sites currently in the Green Belt (equivalent to the sustainable urban extensions) at the likely density of 30 dwellings per hectare. In this regard the Core Strategy does not propose developing the sustainable urban extensions at the

unrealistically high density of 40 dwellings per hectare which is the alternative figure given in the tables.

2.2.5 The EVA does contain a "*case study*" at pages 190 to 191 which purports to undertake a cumulative impact assessment of a large housing site in the Green Belt. However this case study is totally unreliable as a guide to policy-making because:

1. The case study takes no account of the introduction of zero carbon homes in 2016 which will significantly increase construction costs. This is clear from Table 7.33 because it is based on baseline viability which the EVA says excludes zero carbon homes. Instead zero carbon homes is treated by the EVA as an additional policy requirement. This is confirmed by Tables 7.30 to 7.32 (pages 186 to 188) which show additional costs under the Code Level heading. For clarification, zero carbon homes roughly equates to Code Levels 5/6, even after the most recent announcements by the Government. If Zero Carbon Homes is factored into Table 7.33, the proposed development would be unviable. In this regard, none of the larger sustainable urban extensions are likely to begin significant housing construction before 2016.
2. The case study does not make an adequate allowance for likely infrastructure costs. The baseline viability includes an allowance of £7500 per dwelling (Table 7.1, page 127). In addition, Table 7.33 includes a further £590.02 per dwelling for additional infrastructure required by the case study proposal (health centre/primary school/SUDS). Together, it makes a total infrastructure cost for the case study of £8090 per dwelling. This figure must be compared with the infrastructure costs set out in the Mott MacDonald report for the South of the Whiston proposal. Table 6.1 of the Mott MacDonald Report shows infrastructure

costs of £15,300,394 for an 1800 dwelling scheme (which includes the Council's proposed cemetery extension land). This is an average of £8500 per dwelling which is well over the EVA figure for infrastructure in the case study. Moreover there will be other very significant infrastructure costs for the South of Whiston proposal which have not been costed by Mott MacDonald, including contributions for public transport improvements, off-site highway works (such as to the Tarbock Island junction), and for new and improved education and community facilities. Appendix F (penultimate page) of the Mott MacDonald Study confirms that these costs have not been included in their estimates. Although no exact figures can yet be given, these further costs are unlikely to be less than £5million given the scale of the South of Whiston proposal, thereby generating a total infrastructure cost of not less than £20,300,000 which is equivalent to over £11,200 per dwelling. As the EVA report shows, such a level of infrastructure costs would not be viable with a requirement for 25% affordable housing. This is highly relevant to the generality of Policy CS15 because, firstly, there is no evidence that South of Whiston is untypical of the other large sustainable urban extensions in this respect; and secondly, the South of Whiston site constitutes such a large proportion of the total capacity coming forward from the sustainable urban extensions. If its development is stalled by unrealistic policy burdens, the policies of the Core Strategy will not be delivered.

- 2.2.6 In conclusion, the clear evidence is that a 25% affordable homes requirement is likely to jeopardise the viability of the Sustainable Urban Extensions, especially the larger sites, such as South of Whiston, where significant infrastructure will be required to bring the sites for development. In these circumstances, the requirement would be contrary to national policy.

2.2.7 For these reasons we consider that the proposed modification in this respect fails the tests of soundness.

2.3 MO78, M168 and M272: Former Saunders Garden Centre, Windy Arbor Road, Whiston

2.3.1 The site of the former Saunders Garden Centre should be excluded from the South of Whiston Sustainable Urban Extension so that it can be brought forward immediately and not await the completion of the masterplanning exercise for the urban extension as currently required by the proposed modifications for Policy SUE2. This masterplanning exercise has not yet begun and there is no timetable yet for it.

2.3.2 The Saunders site is previously developed land. As such it is very different in character from the rest of the developable land within the proposed Sustainable Urban Extension which is predominantly greenfield agricultural land.

2.3.3 The site is a former retail garden centre which closed about 7 years ago. It is in a semi-derelict state and its unkempt appearance detracts from the amenity of the wider area.

2.3.4 The suitability of the site for housing development has been established for many years. As previously developed land, the principle of its redevelopment is in accordance with national and local green belt policy. The site was originally granted planning permission for housing development in 2010. Since then, the site has regularly formed part of the Council's five year supply of deliverable housing land. The site is therefore very different from the remainder of the developable parts of the South of Whiston site where the principle of development is dependent upon being identified by the Core Strategy as part of the sustainable urban extension.

- 2.3.5 The decision of the Council at a late stage to include the garden centre site within the South of Whiston site has important implications for its development because the current draft of Policy SUE2 would prevent it coming forward for housing except as part of a comprehensive proposal for the whole urban extension. This could delay its development for some time as the wider proposal is dependent upon the cooperation of a number of landowners and developers.
- 2.3.6 The inclusion of the garden centre site within the sustainable urban extension ignores the long history of acceptance by the Council that it is suitable for housing development as a standalone scheme. The decision also ignores the amenity and other benefits arising from the early redevelopment of the site, including its contribution to the five year supply and prioritising the use of previously developed land in accordance with national policy and guidance.
- 2.3.7 The Council has given no reasons why the site has been included in the sustainable urban extension when it has previously been treated as a separate site. As the history shows, it is capable of being developed independently. It is also not required to achieve a satisfactory comprehensive development of the wider area. The Council has already agreed the principle of an access to the south off Windy Arbor Road close to the junction with the M62, and to the north off Lickers Lane. There is no obvious reason why another access onto Windy Arbor Road is necessary or desirable.
- 2.3.8 In conclusion, there is no reason why the development of this previously developed site with its benefits for amenity and deliverable housing supply should be delayed until there is an approved masterplan for the whole of the proposed sustainable urban extension. Such a requirement fails key soundness tests of being justified and in accordance with national policy.

2.3.9 For these reasons we consider that the proposed modifications in this respect fail the tests of soundness and would be potentially unlawful

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



Knowsley Council

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Ms	
Name	Jane Aspinall	
Job Title (if appropriate)	Planning Manager	
Organisation (if appropriate)	██ ██████████	
Postal Address	████████████████████ ██████████	
Postcode	██████████	
Telephone Number	██████████████████	
Email Address	██	
Preferred Method of Contact	email	

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M001 etc.

Policy Ref

Paragraph Ref

1.3 etc.

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Proposed Modifications M001, M020, M022 and M024 are supported in providing clarification on the role of the Sustainable Urban Extensions, including the site East of Halewood.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M042

Policy Ref

CS1

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|--------------------------|
| c) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Sound? (see guidance note 2.3) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the identification and allocation of the Sustainable Urban Extensions in Policy CS1 including the last East of Halewood which is required to meet identified needs for housing.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- c) No, I do not want to participate at any further public hearing
- d) Yes, I wish to participate at any further public hearing

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Signature



Date 13 November 2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055

Policy Ref

CS3

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| e) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the identification and allocation of the Sustainable Urban Extensions in Policy CS3 including the last East of Halewood which is required to meet identified needs for housing.

For the reasons we state in our response to Policy CS5 we do not consider that there is a requirement for Criterion 4 within the body of the policy and that this should be moved to the supporting text. There is therefore no need to cross reference Policy CS5 within the text of Policy CS3.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- e) No, I do not want to participate at any further public hearing
- f) Yes, I wish to participate at any further public hearing

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Date 13 November 2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M078

Policy Ref

CS5

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| g) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

This modification seeks to insert wording which is not in itself a “policy” and provides information. This text should be included in the supporting justification and is not necessary within the body of the policy.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

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Signature



Date 13 November 2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M133 etc.

Policy Ref

Paragraph Ref

6.5 etc

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the provision of clarification that the area priorities will apply to the Sustainable Urban Extensions in M133 and M166. However, as Policy CS5 is effectively a relatively standard Green Belt policy it is unclear why the reference to this policy is retained as the review is no longer (due to modifications to that policy) “in accordance” is incorrect and the policy does not now on its own seek to meet development needs (it is a policy of constraint).

We support the modification of the Halewood Map (6.4) as proposed by M167.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

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Date 13 November 2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
k) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input type="checkbox"/>
l) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the amendments that are proposed through M168 which proposes the inclusion of an additional chapter to address the proposed Sustainable Urban Extensions.

We support the proposed wording of Policy SUE1 and the recognition that these sites are meeting needs during the current plan period and beyond and the implementation of the associated changes to the Green belt boundaries. We specifically support the inclusion of the East of Halewood site (criterion 1(g)) for a residential led development. Criterion 4 should be amended as it refers to “guidance” in policies SUE2 and SUE2a to 2c but this is policy and not guidance. Criterion 5 may not be necessary as by reference to the Policies Map and Policy CS5 it is apparent that this is a matter of fact rather than policy.

In terms of Policy SUE2, whilst we support the Policy in principle, the degree to which it adds value rather than simply repeats other policies is however unclear. It is apparent in terms of the detailed criteria that:

- 1(a) repeats Policy SD1
- 1(b) requires a comprehensive approach but this could be included within SUE1 and repeats Policy CS27
- 1(c) repeats Policy CS19
- 1(d) repeats Policy CS2

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- 1(e) repeats Policy SUE1
- 1(f) repeats Policy CS8 and CS21
- 1(g) repeats Policy CS7
- 1(h) repeats Policy CS20
- 1(i) repeats Policy CS24
- 2) makes reference to “indicative considerations” which are not in themselves policy and therefore this could be in the supporting text.
- 3) simply confirms the council will prepare SPD for certain sites which again is not in itself a policy and just is a statement of intent.
- 4) provides more detail on 1(b) as outlined above but this could be reasonably incorporated within Policy SUE1.

On this basis it is considered that a large part of this policy could be omitted or included within the supporting text, and that those parts which cannot, can be readily and more appropriately incorporated within Policy SUE1.

Policy SUE2b applies specifically to the land East of Halewood and is broadly supported, subject to the comments on SUE2 and associated references, and the matters below. It is known that part of the site is constrained by flooding but the degree to which this impacts upon the capacity of the site is not precisely known. It is considered that the site could readily accommodate 1200 to 1300 dwellings and that evidence has previously been submitted to the Inspector (see the Development Statement for this site (Examination Document RH26a).

Continued...

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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

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Date 13 November 2014

It is therefore considered that the yield from this site should be identified to be **at least** 1200 dwellings rather than “approximately 1100 dwellings”. There is no evidence that indicates that this higher requirement cannot be achieved and indeed past masterplanning work has indicated that even taking into account the open space and flood mitigation requirements, a significantly higher yield can be achieved.

In addition to the proposed residential development it is considered that other uses may be appropriate on the southern portion of the site between Higher Road and the railway line to the south. The policy should be amended to make provision for the fact that some non-residential uses may be appropriate on the site. This would allow the SPD to provide guidance on what these may be and the circumstances in which they may be acceptable.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
m) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input type="checkbox"/>
n) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the deletion of the requirement to achieve the Code for Sustainable Homes, BREEAM and decentralised renewable and low carbon energy systems (see also M183, M208, M209, M210, M212, M215, and M217) and the removal of the requirement to achieve Building for Life and Lifetime Homes. We do not consider that those requirements could be justified and could adversely affect the deliverability and viability of new development.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

m) No, I do not want to participate at any further public hearing

n) Yes, I wish to participate at any further public hearing

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Signature



Date 13 November 2014

11 POLICY CS6

Representations Relating to Policy CS6: Town Centres and Retail Strategy

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS6 001	1	199	Darren Seddon
POLICY CS6 002	1	214	Dennis Crehan
POLICY CS6 003	1	243	Eric Stephenson
POLICY CS6 004	1	351	Katy Andrews
Total	4		



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	DARREN SEDDON	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

DARREN SEDDON

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

WGRS14

Paragraph Ref

EC3

2. Do you consider that the proposed modification is ? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Whiston Village is undermined owing to large retail park at Prescot. Further outlet would lead to local shops closing with disused buildings becoming unsightly and dangerous. If outside contractors come in they would use outside labour & not local people. Future employment opportunities for locals is overstated & aspirational. There are no guarantees and therefore people will come to the area with no or little employment opportunities. "Executive aspirations" are unachievable in this area.

Continue on a separate sheet if necessary

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- 1) Take into account Eric Pickles M.P. comments on Oct. 16 2014
- 2) Take into account O.N.S. Population figures for 2014
- 3) Re-convene public inspectors & carry out up to date transport survey.

Continue on a separate sheet if necessary

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

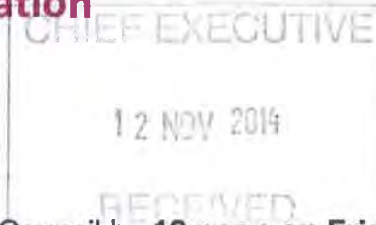
1/11/14



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Dennis Crehan	
Job Title (if appropriate)	Retired	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS14

Policy Ref

KGB 14

Paragraph Ref

204/18

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

PLEASE NOTE: Personal information provided as part of a representation should be treated as confidential. If you wish to provide information which will only be used for the purposes of preparing the Local Plan, please contact the Data Protection Officer at the Council. **Continue on a separate sheet if necessary.**

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Before giving permission to build on this land I would like you to consider the impact on the local wildlife and the destruction of the ~~rural~~ environment. The premise of providing housing in a semi-rural setting does not make sense if the ~~rural~~ setting has been destroyed. Also to build on any green belt when there is the possibility of world food shortage is madness. The impact also of this project would be to the village itself because the centre would shift to the new shops leaving the old shops derelict.

Continue on a separate sheet if necessary...

All the promise of new jobs is as usual Pie in the sky and is not supported by any evidence

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 1/11/2014

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



Knowsley Council



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Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	Eric Sibley	
Job Title (if appropriate)	Retired	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

IC STRATHKENSON

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

88B14

Policy Ref

K9B14

Paragraph Ref

E23

2. Do you consider that the proposed modification is ? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Wickrow Village Shopping Area & Surrounding Area.
are not used to TO, THESE VARIOUS OUTLETS
if more outlets are created than local stores.
would vanish!
" Employment opportunities for local people. A
question are are estimated, as all jobs have to go
out for tender? leading to various build up
development from central in such that used
local trade persons, as stated in DOCK 88B14
SA. Obj. E23.
worry like may. prospective & possible scene in
the Core Strat Plan. with not guarantee that em.
jobs will be created!

Continue on a separate sheet if necessary

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

No To Building A Green Belt.
Plenty of Brown Land. in
the surrounding Area To build
Houses.

Continue on a separate sheet if necessary

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy** and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Si  Date 1/11/2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE **Knowsley Council**

12 NOV 2014

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	miss	
Name	Katy Andrews	
Job Title (if appropriate)	Banking customer relations manager	
Organisation (if appropriate)	Barclays	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Katy Andrews

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KGBS14

Paragraph Ref

EC3

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

There is no evidence this development will bring employment to the area that is why I feel this proposed modification is not sound.

There's nothing to say local firms will be used for the construction, either

creating any further shopping outlets will also damage the local business causing further unemployment.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Allow brown belt land to be developed before considering the sale of Greenbelt.
Take into consideration the information given by Eric pickles about Greenbelt land.

Continue on a separate sheet if necessary...

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- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature 

Date 11/11/14

12 POLICY CS7

Representations Relating to Policy CS7: Transport Networks

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS7 001	1	108	Chris Edge, Barton Willmore for Junction Property Ltd
POLICY CS7 002	1	359	Keith Wooding
Total	2		

From: Chris Edge [REDACTED]
Sent: 14 November 2014 08:34
To: Knowsley Local Plan
Subject: Knowsley Local Plan Core Strategy and SPD: Representations on Behalf of Junction Property Limited
Attachments: CS Mods Response Form.pdf; SUE Consultation- 20 10 14.pdf; Counsel's Opinion-Policy SUE2-Nov 2014.pdf; Repls -Proposed Mods-Final- 07 11 14.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

Please find attached representations on behalf Junction Property Limited (JPL) to the following consultation documents:

1. Representations to the Knowsley Local Plan: Core Strategy: Proposed Modifications - Consultation (representations form, representations report and Counsels Opinion - 3 pdf files); and
2. A Representations Form in respect of the South of Whiston (residential) and Land South of M62 (employment and Country Park) SPD (1 pdf file).

Please acknowledge receipt of this email and the attachments in due course.

Kind Regards,

Chris Edge
Associate

Planning . Design . Delivery
bartonwillmore.co.uk



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We are exhibiting at the Farm Business Innovation Show 2014!
Find more information on our stand and seminar [here](#)

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Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title		
Name		Michael Courcier
Job Title (if appropriate)		
Organisation (if appropriate)	Junction Property Ltd	Barton Willmore
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

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- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature

Date

RE: THE KNOWSLEY LOCAL PLAN: CORE STRATEGY AND POLICY SUE2

ADVICE

1. I am asked to advise on an issue which has arisen in respect of the latest proposed form of policy SUE2 of the Knowsley Local Plan Core Strategy.
2. My Instructing Planner is acting on behalf of clients who are promoting the development of land South of Whiston and South of the M62 in Knowsley. Both areas of land are proposed to be taken out of the Green Belt and allocated in the Core Strategy as Sustainable Urban Extensions (“SUE”).
3. The policy contains some detail about how applications for planning permission in those (and other) SUEs will be treated. This largely consists of referring to issues that would be material considerations in any planning decision and giving cross-references to other plan policies. Masterplans are to be prepared, as are Supplementary Planning Documents.
4. Part 2 of policy SUE2 would provide that “Indicative considerations applicable to the sustainable development of each SUE are listed at Appendix E ‘Sustainable Urban Extension Allocation Profiles’”. However, Appendix E gives very little information. For each of the SUEs in which my client is interested, the appendix gives details of site location, size and capacity and then refers to flood zones, wildlife sites, urban green space and the need to connect to extant urban development. Importantly, appendix E is introduced with a statement that whilst

the appendix sets out key planning constraints and opportunities, the items listed are not exhaustive and other considerations are likely to apply.

5. Part 3 of policy SUE2 states that for each SUE, the Council will prepare a Supplementary Planning Document (“SPD”) which will set out a proposed spatial framework, together with “further details of development and infrastructure requirements”.
6. I am asked whether there is a risk that the proposed SPDs would be unlawful. I think that there is. I say that for the following reasons.
7. The Town and Country Planning (Local Planning) Regulations 2012 set out, rather tortuously, what documents can and cannot be SPDs. They do so in a most convoluted way.
8. Regulation 2 of the 2012 Regulations sets out a definition of “Local Plan” as being any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv) or 5(2)(a) or (b), and requires such documents to be prepared as a development plan document. For some unknown reason, that definition is repeated in identical terms in Regulation 6.
9. The 2012 Regulations define an SPD as any document of a description referred to in regulation 5 (except an adopted policies map or a statement of community involvement) which is not a local plan. For all practical purposes, that means that only a document which falls within the scope of Regulation 5(1)(a)(iii) can be an

SPD. No other document can be an SPD because it will either (i) not be within the scope of Regulation 5 at all, or (ii) be within the scope of Regulation 5 but is a local plan: see *R (RWE NPower Renewables Limited) v Milton Keynes BC and another* [2013] EWHC 751 (Admin) at [28].

10. A document does not come within the scope of Regulation 5 at all if it merely repeats Development Plan policy for background information or for clarity of presentation and Regulation 5 is concerned with *new* statements of policy: *RWE NPower* at [67].
11. The difficulty is caused in this case by the vagueness of what the Development Plan leaves as the potential content of the SPD. The warning that the information in the plan and its Appendix E is not comprehensive runs the real risk that new statements could be set out in the SPD for the first time and it cannot be said that the SPD would simply repeat the Development Plan policy for clarity or background. So much is, I think, clear from the introductory words of caution in Appendix E and the generality of the content of policy SUE2 itself.
12. If that is so, one has to consider whether the SPD might contain provisions which fall within the definition of a local plan. It is clear that the SPD would not contain new site allocations because that is an issue about which policy SUE2 is sufficiently clear. There is therefore no need to consider Regulation 5(1)(a)(ii), aspects of (iv) or 5(2)(b) any further.

13. Regulation 5(1)(a)(i) applies to documents which contain statements about “the development and use of land which the local planning authority wish to encourage during any specified period”. The Courts have emphasised the references to encouragement and to a specified period: *Miller Homes Limited v Leeds City Council* [2014] EWHC 82 (Admin) at [24]¹. There must be a real risk, given the current terms of the Core Strategy, that the SPD would contain new statements which fall within this classification.

14. Further, Regulation 5(1)(a)(iv) has the effect of providing that a document will be a local plan and has to be prepared as a DPD if it contains statements about “development management policies, which are intended to guide the determination of applications for planning permission.” The Courts have held that the important consideration is whether the policy is designed to regulate the use of land: see *RWE NPower* at [75] and *Miller Homes* at [37]. Given the indications in the Core Strategy of what the SPD might deal with, there must be a real risk that the purported SPD would contain new statements of policy which regulate the development of the SUEs.

15. In short, the only document which could lawfully be an SPD connected to policy SUE2 would be one which fell within the scope of Regulation 5(1)(a)(iii) of the 2012 Regulations, namely a document containing statements about “any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i)”. I do not believe that it can be said that SPD would be bound to fall within this

¹ It should be acknowledged that this case is the subject of an appeal to the Court of Appeal which has a date for a hearing fixed in March 2015.

category, given that policy SUE2 part 3 states that the SPD will contain a spatial development framework and further details of development and infrastructure requirements. It seems to me that the draft Core Strategy envisages the SPD going beyond what is within the lawful scope of an SPD.

16. I therefore conclude that on the basis of the presently proposed terms of policy SUE2, there is a very real risk that any purported SPD would go beyond the lawful scope of an SPD and would enter territory which can only be covered by a Development Plan Document.

17. Indeed, the matter goes further than that. The lack of clarity in the proposed policy itself means that the policy itself may be unlawful. That is because part 3 of policy SUE2 vaguely refers to the provision of “further details of development requirements” being set out in the SPD. That approach, depending upon what those words intend and the proposed content of the SPD, runs the risk of falling foul of the principle that a Development Plan Document cannot choose to exclude from it policy provisions which the plan maker intends to guide decision-making: see *Westminster City Council v Great Portland Estates* (1985) AC 636 at page 674E where Lord Scarman said:

“If a local planning authority has proposals of policy for the development and use of land in its area which it chooses to exclude from the plan, it is, in my judgment, failing in its statutory duty.”

18. I accept that SPDs can be used to prescribe further detail to a policy set out in the DPD², but the vagueness of part 3 of SUE2 means that it cannot be said that SUE2 prescribes the policy requirements at a general level and the SPD would only set out further detail. I think the wording of SUE2 opens the risk that an SPD might contain new statements of policy, not foreshadowed in the Core Strategy and which would not be tested by any examination of their soundness.

19. I trust that I have dealt with all of the matters upon which my view was sought. If I can be of any further assistance, then my Instructing Planner must not hesitate to contact me in Chambers.

MARTIN CARTER
20th October 2014.

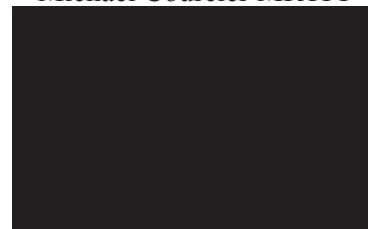
Kings Chambers
Manchester – Leeds – Birmingham.

² E.g, *Simplex (GE) Holdings Limited v SoSE* [1988] JPL 809; and *Watson v Essex CC* [2002] EWHC 669 (Admin).

RE: THE KNOWSLEY CORE
STRATEGY AND POLICY SUE2

ADVICE

Michael Courcier MRTPI



KNOWSLEY LOCAL PLAN CORE STRATEGY EXAMINATION
PROPOSED MODIFICATIONS TO SUBMISSION DOCUMENTS
REPRESENTATIONS BY BARTON WILLMORE
ON BEHALF OF JUNCTION PROPERTY LTD
NOVEMBER 2014

1 Supporting Representations

1.1 Junction Property Ltd (JPL) supports most of the proposed modifications now being suggested by the Council.

1.2 JPL welcomes in particular the following proposed modifications for the reasons given in evidence to the hearing sessions:

MO42 The removal of the Sustainable Urban Extensions from the Green Belt and their allocation for development as part of the spatial strategy identified in Policy CS1 and its accompanying text.

MO55 Acceptance of the Sedgefield method to calculate the five year housing requirement as part of Policy CS3 and its accompanying text (also MO56A, MO56B, MO65).

MO59 Setting out the circumstances which would trigger a review of Policy CS3. (However JPL considers that this should be a Main Modification because of its importance to the soundness of the Plan rather than a minor modification as currently suggested).

MO76	Inclusion of the reference to very special circumstances as part of Policy CS5.
MO78	Removal of the Sustainable Urban Extensions from the Green Belt as part of Policy CS5.
M112	Confirmation that measures to mitigate carbon emissions and improve air quality will only be sought " <i>where appropriate</i> ".
M157	Confirmation that the release of the Sustainable Urban Extensions will no longer be delayed until the longer-term.

2 Representations Objecting to Specific Proposed Modifications

2.1 M168: New Chapter 6A on Sustainable Urban Extensions

2.1.1 JPL welcomes most of the principles set out in Policies SUE1 to SUE2c. In particular it supports the following:

- the immediate release of the sustainable urban extensions to meet identified development needs;
- the development of the South of Whiston site for between 1500 and 1800 dwellings (depending on whether of the Council owned land currently identified for a cemetery extension is included in the development area);
- the development of the land South of the M62 for employment development; and
- proposals must demonstrate a comprehensive approach to site development and infrastructure provision, including the matters set out in paragraph 6A.18.

- 2.1.2 JPL however **OBJECTS** to the third part of Policy SUE2 where it says that the masterplan required under the policy to accompany any planning applications for the site should "*accord*" with development plan policy "*and any associated Supplementary Planning Document.*" There is of course no objection to the principle that the masterplan should accord with development plan policy. However the development plan should not impose a requirement that the masterplan for a site must "*accord with*" the proposed Supplementary Planning Document. Such a requirement would effectively incorporate the supplementary planning document into the development plan policy as lack of accord with it would create conflict with Policy SUE2 itself. This is wholly inappropriate because supplementary planning documents are not subject to the same rigorous statutory procedures and testing as development plan policies.
- 2.1.3 Development plan policies only receive the status accorded to them under Section 38(6) of the 2004 Act after they have been independently tested and examined, and found to meet the tests of soundness set out in national policy. They are also subject to very exacting and lengthy procedures for stakeholder and public involvement and consultation. In contrast, supplementary planning documents are not the subject of any independent examination or testing against the tests of soundness. Moreover they are not required to undergo the same rigorous requirements for stakeholder and public involvement and consultation. Because of these differences, planning law gives development plan policy and supplementary planning documents very different statuses in decision-making
- 2.1.4 Section 38(6) of the 2004 Act requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Under this section of the Act, a supplementary planning document has only the status of a material consideration to which regard should be given. It is not development plan policy where there is an expectation

of accordance unless material considerations indicate otherwise. As such, a proposal which accords with the development plan but is not in accordance with a supplementary planning document would still receive the presumption in favour under Section 38(6). The proposed modification seeks to reverse this position established by statute. The same would apply to the national policy position, and in particular the presumption in favour of sustainable development under paragraphs 14, 196 and 197 of the NPPF.

2.1.5 The proposed supplementary planning documents for the sustainable urban extensions have not, of course, been prepared yet. As such, it is not known what matters they will cover or whether their policies and proposals will be consistent with national policy and guidance, especially in respect of viability which is so important to the delivery of the Core Strategy as a whole. In such circumstances, it is wholly inappropriate for Policy SUE2 to require planning decisions to accord with them. We note in this respect that the Council has suggested other proposed modifications that remove any requirement for proposals to accord with supplementary planning documents. A similar change should be made here.

2.1.6 To assist the Inspector, we attach Counsel's Written Opinion which confirms that the provisions of Policy SUE2 so far as they relate to the proposed Supplementary Planning Documents would be potentially unlawful and may be capable of successful challenge in the Courts.

2.1.7 For these reasons we consider that the proposed modification in this respect fails the tests of soundness and would be potentially unlawful.

2.2 M169 and M190: Policy CS 15 on Affordable Housing

2.2.1 The proposed modifications make a distinction between the levels of affordable housing required on sites within the current urban area (10%) and on Sustainable Urban Extensions (25%). Proposed Modification 190 says that this distinction is

because the Knowsley Economic Viability Assessment (EVA) "*suggests*" there is a generally higher level of development viability in the proposed Sustainable Urban Extensions than in the existing urban areas.

2.2.2 JPL considers that the proposed policy requirement for sustainable urban extensions has not been properly justified by viability evidence. As such, it does not accord with national policy.

2.2.3 The National Planning Policy Framework (NPPF) states (paragraph 173) that pursuing sustainable development requires "*careful attention*" to viability and costs in plan-making. It emphasises that plans must be deliverable and to achieve this, "*the (allocated) sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.*" The Framework adds that to ensure viability, the costs of any requirements likely to be applied to development "*such as requirements for affordable housing, standards, infrastructure contributions or other requirements*" should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing developer to enable the development to be deliverable.

2.2.4 The Knowsley EVA fails to undertake the type of exercise required by national policy to justify an affordable housing target. The tables at pages 186 to 188 only examine the impacts of individual policy requirements, and no conclusions are reached about the cumulative impact of the policy requirements. Nonetheless, if the impacts of individual policies in Tables 7.30 to 7.32 are added together, it is clear that a 25% affordable housing requirement would not be viable on most large housing sites currently in the Green Belt (equivalent to the sustainable urban extensions) at the likely density of 30 dwellings per hectare. In this regard the Core Strategy does not propose developing the sustainable urban extensions at the

unrealistically high density of 40 dwellings per hectare which is the alternative figure given in the tables.

2.2.5 The EVA does contain a "*case study*" at pages 190 to 191 which purports to undertake a cumulative impact assessment of a large housing site in the Green Belt. However this case study is totally unreliable as a guide to policy-making because:

1. The case study takes no account of the introduction of zero carbon homes in 2016 which will significantly increase construction costs. This is clear from Table 7.33 because it is based on baseline viability which the EVA says excludes zero carbon homes. Instead zero carbon homes is treated by the EVA as an additional policy requirement. This is confirmed by Tables 7.30 to 7.32 (pages 186 to 188) which show additional costs under the Code Level heading. For clarification, zero carbon homes roughly equates to Code Levels 5/6, even after the most recent announcements by the Government. If Zero Carbon Homes is factored into Table 7.33, the proposed development would be unviable. In this regard, none of the larger sustainable urban extensions are likely to begin significant housing construction before 2016.
2. The case study does not make an adequate allowance for likely infrastructure costs. The baseline viability includes an allowance of £7500 per dwelling (Table 7.1, page 127). In addition, Table 7.33 includes a further £590.02 per dwelling for additional infrastructure required by the case study proposal (health centre/primary school/SUDS). Together, it makes a total infrastructure cost for the case study of £8090 per dwelling. This figure must be compared with the infrastructure costs set out in the Mott MacDonald report for the South of the Whiston proposal. Table 6.1 of the Mott MacDonald Report shows infrastructure

costs of £15,300,394 for an 1800 dwelling scheme (which includes the Council's proposed cemetery extension land). This is an average of £8500 per dwelling which is well over the EVA figure for infrastructure in the case study. Moreover there will be other very significant infrastructure costs for the South of Whiston proposal which have not been costed by Mott MacDonald, including contributions for public transport improvements, off-site highway works (such as to the Tarbock Island junction), and for new and improved education and community facilities. Appendix F (penultimate page) of the Mott MacDonald Study confirms that these costs have not been included in their estimates. Although no exact figures can yet be given, these further costs are unlikely to be less than £5million given the scale of the South of Whiston proposal, thereby generating a total infrastructure cost of not less than £20,300,000 which is equivalent to over £11,200 per dwelling. As the EVA report shows, such a level of infrastructure costs would not be viable with a requirement for 25% affordable housing. This is highly relevant to the generality of Policy CS15 because, firstly, there is no evidence that South of Whiston is untypical of the other large sustainable urban extensions in this respect; and secondly, the South of Whiston site constitutes such a large proportion of the total capacity coming forward from the sustainable urban extensions. If its development is stalled by unrealistic policy burdens, the policies of the Core Strategy will not be delivered.

- 2.2.6 In conclusion, the clear evidence is that a 25% affordable homes requirement is likely to jeopardise the viability of the Sustainable Urban Extensions, especially the larger sites, such as South of Whiston, where significant infrastructure will be required to bring the sites for development. In these circumstances, the requirement would be contrary to national policy.

2.2.7 For these reasons we consider that the proposed modification in this respect fails the tests of soundness.

2.3 MO78, M168 and M272: Former Saunders Garden Centre, Windy Arbor Road, Whiston

2.3.1 The site of the former Saunders Garden Centre should be excluded from the South of Whiston Sustainable Urban Extension so that it can be brought forward immediately and not await the completion of the masterplanning exercise for the urban extension as currently required by the proposed modifications for Policy SUE2. This masterplanning exercise has not yet begun and there is no timetable yet for it.

2.3.2 The Saunders site is previously developed land. As such it is very different in character from the rest of the developable land within the proposed Sustainable Urban Extension which is predominantly greenfield agricultural land.

2.3.3 The site is a former retail garden centre which closed about 7 years ago. It is in a semi-derelict state and its unkempt appearance detracts from the amenity of the wider area.

2.3.4 The suitability of the site for housing development has been established for many years. As previously developed land, the principle of its redevelopment is in accordance with national and local green belt policy. The site was originally granted planning permission for housing development in 2010. Since then, the site has regularly formed part of the Council's five year supply of deliverable housing land. The site is therefore very different from the remainder of the developable parts of the South of Whiston site where the principle of development is dependent upon being identified by the Core Strategy as part of the sustainable urban extension.

- 2.3.5 The decision of the Council at a late stage to include the garden centre site within the South of Whiston site has important implications for its development because the current draft of Policy SUE2 would prevent it coming forward for housing except as part of a comprehensive proposal for the whole urban extension. This could delay its development for some time as the wider proposal is dependent upon the cooperation of a number of landowners and developers.
- 2.3.6 The inclusion of the garden centre site within the sustainable urban extension ignores the long history of acceptance by the Council that it is suitable for housing development as a standalone scheme. The decision also ignores the amenity and other benefits arising from the early redevelopment of the site, including its contribution to the five year supply and prioritising the use of previously developed land in accordance with national policy and guidance.
- 2.3.7 The Council has given no reasons why the site has been included in the sustainable urban extension when it has previously been treated as a separate site. As the history shows, it is capable of being developed independently. It is also not required to achieve a satisfactory comprehensive development of the wider area. The Council has already agreed the principle of an access to the south off Windy Arbor Road close to the junction with the M62, and to the north off Lickers Lane. There is no obvious reason why another access onto Windy Arbor Road is necessary or desirable.
- 2.3.8 In conclusion, there is no reason why the development of this previously developed site with its benefits for amenity and deliverable housing supply should be delayed until there is an approved masterplan for the whole of the proposed sustainable urban extension. Such a requirement fails key soundness tests of being justified and in accordance with national policy.

2.3.9 For these reasons we consider that the proposed modifications in this respect fail the tests of soundness and would be potentially unlawful



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Keith Wooding	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B 1- YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055 to
M065

Policy Ref

CS1, to CS5,
SUE

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Generally, the Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

It is disappointing that these proposals to build on Greenbelt at South Whiston have only just come to light despite claims that due consultation process has been followed. Public meetings with the Inspector should be re-convened to take into account the views of local residents in accordance with the provision of the Government in the Localism Bill.

It can be seen that the Knowsley Local Plan does not take into account the latest data from the Office of National Statistics (ONS) in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014. Furthermore, the plan, its strategy and objectives contain many conflicting and ambiguous statements, with little in the way of tangible deliverables. Often making reference to flawed and outdated supporting documentation.

Delivery of Strategic Objectives is not considered to be SMART, outputs are not 'measurable' and therefore cannot be seen as being 'achievable'. This in turn would cast doubt on the 'realistic' criteria.

On a personal note if I had submitted proposals for work, of this standard with this many grey areas, undefined & unquantified benefits with little substantive basis, I'd be shot.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature 

Date 11/11/14

PART B2 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055 to
M065

Policy Ref

CS1, to CSS,
SUE

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| c) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP (updated October 2014) the Secretary of State for Communities, which states "Planners must protect our Green Belt" and "This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development". See link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. It is clear that no exceptional circumstances exist in Whiston.

The North West does not have the Housing shortage that London and the South east has, and as such removal of Greenbelt should not be considered in this case.

This objection to the release of green belt has also been raised as Knowsley council have not proven that all practical alternatives & Brown Field sites have been explored, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley plan fails to give high enough priority and consideration to the empty housing stock within the borough. Knowsley have a very poor record of bringing empty and derelict housing back into use. No reference can be found to any consultation with local housing trusts. Knowsley have not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touches Liverpool at Huyton and the proposals at South Whiston will bring urbanisation up to the boundary with St Helens. Likewise the proposal at Cronton will bring Knowsley closer to Halton. This is NOT consistent with National Policy.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

c) No, I do not want to participate at any further public hearing

d) Yes, I wish to participate at any further public hearing

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Signature



Date

11/11/14

PART B3 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| e) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

In relation to KGBS14 South of Whiston. This policy is contrary to Strategic Objective 8, CS5, CS8 & CS21. Either the principles set out in SO8 are adhered to, or the land is used for development.

As stated in CS5 and CS8, it cannot meet both opposing policies. In fact C21 8.21-8.26 reduce to the point of being ineffective the relevance of CS3 and the requirement to release Green Belt land for development at all.

Given that there are prime areas of land around Prescot & Huyton that previously have been earmarked for housing yet lie undeveloped for a number of years indicates that Knowsley model for predicting the number of houses that will need to be built and the land required is flawed.

If the model was correct those areas would have been redeveloped. This proves that there is no justification to release Green Belt land except for Knowsley council financial benefit.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

e) No, I do not want to participate at any further public hearing

f) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

PART B 4– YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
g) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to the area south of M62. The proposed September modifications took the emphasis off investment in existing locations and placed it firmly on the 'new'. This indicates that Knowsley have little or no appetite to fill the empty space in Huyton Business park and empty units on nearby Fallows Way.

A ten minute drive round Huyton Business Park will show how much unused land or empty unit/buildings are available. The occupancy level is one area where there are inaccuracies in the supporting documentation.

The area south of M62 doesn't need more employment locations, it just needs the existing areas to realise their full potential. Proper effective management would achieve this whilst allowing other Core Objectives to be met.

Clearly the site has potential, as recently a developer acquired a large site for redevelopment.

For Fallows way, it is believed that two of the three units are un occupied at present. If the remaining occupant could be encouraged to relocate to Huyton Business Park, the whole of Fallows Way could be given over to housing. Reducing further the need to use Green Belt land. This would have the added benefit of reducing the number of large lorries that use Windy Harbour Road daily and hence congestion.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

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Signature



Date

11 / 11 / 14

PART B5 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to KGBS14 South Whiston, there is very little mention of provision for new local centre, expansion or regeneration of existing local shops

As for 6.45, the policy is flawed and mostly irrelevant. This highlights lack of understanding of local issues. In turn this suggests that Knowsley have taken a 'one-solution-fits-all' approach. This element of the core strategy cannot be met.

Little mention is made of requirement for additional facilities such as health care or clinic, GP surgeries and dentist. Nursery and school requirements are also not described.

No reference was found to alternative policy documents that would detail these requirements, which suggests that no additional pre-school or school facilities are planned to meet huge increase in demand for services from such a large housing development. Similarly no additional health care provision. A number of strategic objectives will not be met

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

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Signature



Date

12/11/14

PART B6 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M112

Policy Ref

CS7

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| k) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| l) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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With reference to KGBS14 South Whiston area.

Improvements to existing rail network, enhancements to stations.

As a regular train user from Whiston Station, Network Rail have been observed undertaking a passenger survey. This is with a view to CLOSE Whiston station. How does that help meet the transport policy? Clauses 1a, 1c, 2b, 3b, 3e

Also, and contrary to supporting documents, bus routes and times have been revised to the effect of after evening rush hour a minimal number buses are running. This will prevent a number of clauses from being met.

This removes choice, a key policy objective.

In reality this will manifest itself as people making greater use of personal car or cars. This will further bring the transport policy into disarray and have a negative impact on other perceived benefits & strategic policies

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

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k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

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Signature



Date

11/11/14

13 POLICY CS8

Representations Relating to Policy CS8: Green Infrastructure

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS8 001	1	11	Kate Wheeler, Natural England
POLICY CS8 002	1	359	Keith Wooding
POLICY CS8 003	1	427	Mike Collier, Wildlife Trust
Total	3		

Date: 11 November 2014
Our ref: 132515



localplan@knowsley.gov.uk
BY EMAIL ONLY



Dear 

Planning consultation: Modifications to the Knowsley Local Plan

Thank you for your consultation on the above which was received by Natural England on 19 September 2014.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has the following comments to make on the Knowsley Local Plan and its further proposed main modifications. We note one of the key issues covered is the removal of the previous phasing mechanism covering the release of sites from the Green Belt to meet Knowsley’s needs for new housing and employment development, with the 9 previously identified “reserve” locations for longer term release from the Green Belt up to 2028 are now proposed to be brought forward in the short term as site allocations in the Core Strategy.

Natural England welcomes: M117, 69, Policy CS8 clause 1b
1b. Sustain and promote biodiversity and (including designated sites, priority habitats and protected and endangered species) in accordance with importance and contribution to ecological networks (including protected and endangered species);

Natural England notes that M122 (PM29), 69, Policy CS8 clause 6c has been amended as follows:
6c. Seek to Protect, maintain and **where possible** enhance biodiversity within and around new developments, according to their designation and significance to provide space for nature; and. To enable adequate flexibility for consideration of circumstances where appropriate justification of limited opportunities for enhancement could be provided. ‘Where possible’ has been added in, Natural England welcomed the previous iteration of this policy, which provided a more positive emphasis on the need to enhance the natural environment as well as protect it. We suggest it is should read, *seek to protect, maintain and enhance biodiversity*.

M123 (PM30), 69, Policy CS8 new clause 6d.
Provide adequate mitigation and / or, as a last resort, compensation for Green Infrastructure or biodiversity loss, in circumstances where harm resulting from the development is otherwise unavoidable.

Natural England notes to ensure consistency with the Council’s intention to replace the Greenspace Standards and New Development SPD with a Developer Contributions SPD, we would expect to



see GI and GI standards fully incorporated into this new SPD.

M127, 73, Paragraph 5.95

New paragraphs 5.95A, 5.95B,

Natural England welcome the inclusion on new paragraphs detailing the Protection of Green Infrastructure, Natural Assets and Biodiversity.

M128, 73

New Paragraph 5.95D

In this section it would also be beneficial to add that any European and International sites affected by development will need to be considered in respect to the Habitats Regulations due to the fact that mitigation and compensation options in these cases will need to follow stringent tests set out in the regulations.

Habitats Regulations Assessment

Natural England note that the plan has undergone a further stage of Habitats Regulations Assessment to assess the impacts of the final proposed modifications on habitats, and in particular on "European Sites". It is noted the most significant proposed modification from an HRA point of view is the inclusion of Chapter 6 and the nine proposed Sustainable Urban Extensions (SUEs). Natural England agrees with the conclusions reached in this further assessment.

For any queries relating to the specific advice in this letter only please contact Kate Wheeler on [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED]

Yours sincerely

Kate Wheeler

Cheshire, Greater Manchester, Merseyside and Lancashire Area



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

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- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Keith Wooding	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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Keith Wooding

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M065

Policy Ref

CS1, to CS5,
SUE

Paragraph Ref

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- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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It is disappointing that these proposals to build on Greenbelt at South Whiston have only just come to light despite claims that due consultation process has been followed. Public meetings with the Inspector should be re-convened to take into account the views of local residents in accordance with the provision of the Government in the Localism Bill.

It can be seen that the Knowsley Local Plan does not take into account the latest data from the Office of National Statistics (ONS) in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014. Furthermore, the plan, its strategy and objectives contain many conflicting and ambiguous statements, with little in the way of tangible deliverables. Often making reference to flawed and outdated supporting documentation.

Delivery of Strategic Objectives is not considered to be SMART, outputs are not 'measurable' and therefore cannot be seen as being 'achievable'. This in turn would cast doubt on the 'realistic' criteria.

On a personal note if I had submitted proposals for work, of this standard with this many grey areas, undefined & unquantified benefits with little substantive basis, I'd be shot.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 11/11/14

PART B2 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
c) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP (updated October 2014) the Secretary of State for Communities, which states "Planners must protect our Green Belt" and "This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development". See link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. It is clear that no exceptional circumstances exist in Whiston.

The North West does not have the Housing shortage that London and the South east has, and as such removal of Greenbelt should not be considered in this case.

This objection to the release of green belt has also been raised as Knowsley council have not proven that all practical alternatives & Brown Field sites have been explored, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley plan fails to give high enough priority and consideration to the empty housing stock within the borough. Knowsley have a very poor record of bringing empty and derelict housing back into use. No reference can be found to any consultation with local housing trusts. Knowsley have not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touches Liverpool at Huyton and the proposals at South Whiston will bring urbanisation up to the boundary with St Helens. Likewise the proposal at Cronton will bring Knowsley closer to Halton. This is NOT consistent with National Policy.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

c) No, I do not want to participate at any further public hearing

d) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

PART B3 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
e) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

In relation to KGBS14 South of Whiston. This policy is contrary to Strategic Objective 8, CS5, CS8 & CS21. Either the principles set out in SO8 are adhered to, or the land is used for development.

As stated in CS5 and CS8, it cannot meet both opposing policies. In fact C21 8.21-8.26 reduce to the point of being ineffective the relevance of CS3 and the requirement to release Green Belt land for development at all.

Given that there are prime areas of land around Prescot & Huyton that previously have been earmarked for housing yet lie undeveloped for a number of years indicates that Knowsley model for predicting the number of houses that will need to be built and the land required is flawed.

If the model was correct those areas would have been redeveloped. This proves that there is no justification to release Green Belt land except for Knowsley council financial benefit.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

e) No, I do not want to participate at any further public hearing

f) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

PART B 4– YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
g) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to the area south of M62. The proposed September modifications took the emphasis off investment in existing locations and placed it firmly on the 'new'. This indicates that Knowsley have little or no appetite to fill the empty space in Huyton Business park and empty units on nearby Fallows Way.

A ten minute drive round Huyton Business Park will show how much unused land or empty unit/buildings are available. The occupancy level is one area where there are inaccuracies in the supporting documentation.

The area south of M62 doesn't need more employment locations, it just needs the existing areas to realise their full potential. Proper effective management would achieve this whilst allowing other Core Objectives to be met.

Clearly the site has potential, as recently a developer acquired a large site for redevelopment.

For Fallows way, it is believed that two of the three units are un occupied at present. If the remaining occupant could be encouraged to relocate to Huyton Business Park, the whole of Fallows Way could be given over to housing. Reducing further the need to use Green Belt land. This would have the added benefit of reducing the number of large lorries that use Windy Harbour Road daily and hence congestion.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy** and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11 / 11 / 14

PART B5 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to KGBS14 South Whiston, there is very little mention of provision for new local centre, expansion or regeneration of existing local shops

As for 6.45, the policy is flawed and mostly irrelevant. This highlights lack of understanding of local issues. In turn this suggests that Knowsley have taken a 'one-solution-fits-all' approach. This element of the core strategy cannot be met.

Little mention is made of requirement for additional facilities such as health care or clinic, GP surgeries and dentist. Nursery and school requirements are also not described.

No reference was found to alternative policy documents that would detail these requirements, which suggests that no additional pre-school or school facilities are planned to meet huge increase in demand for services from such a large housing development. Similarly no additional health care provision. A number of strategic objectives will not be met

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 12/11/14

PART B6 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M112

Policy Ref

CS7

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| k) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| l) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With reference to KGBS14 South Whiston area.

Improvements to existing rail network, enhancements to stations.

As a regular train user from Whiston Station, Network Rail have been observed undertaking a passenger survey. This is with a view to CLOSE Whiston station. How does that help meet the transport policy? Clauses 1a, 1c, 2b, 3b, 3e

Also, and contrary to supporting documents, bus routes and times have been revised to the effect of after evening rush hour a minimal number buses are running. This will prevent a number of clauses from being met.

This removes choice, a key policy objective.

In reality this will manifest itself as people making greater use of personal car or cars. This will further bring the transport policy into disarray and have a negative impact on other perceived benefits & strategic policies

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

Supplementary Planning Documents (SPD) & Local Development Orders (LDO)

Consultation - Response Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Tuesday 21 October 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Mike Collier	
Job Title (if appropriate)	Volunteer Planning Officer	
Organisation (if appropriate)	████████████████████ ████████████████████	
Postal Address	██████████ ██████████ ██████████ ██████████	
Postcode	██████████	
Telephone Number	██████████	
Email Address	████████████████████	
Preferred Method of Contact	email	

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR RESPONSE

Please use duplicates of Part B, as necessary for different parts of the document.

COMMENT No 1

1. To which SPD or LDO are these comments intended to relate?

Core Strategy (Proposed Modifications)

2. To which part of the SPD or LDO are these comment intended to relate?

Page

Paragraph / Figure

5.95

3. Please provide comments below.

The Trust feels that the Key Priorities referred to in paragraph 5.95 should include the full hierarchy of designated sites as listed in paragraph 5.95B. Wording for the first bullet point along the following lines is suggested:

[“To manage the natural assets better – to protect the integrity of all designated nature sites, and to.....”](#)

COMMENT No 2

1. To which SPD or LDO are these comments intended to relate?

Core Strategy (Proposed Modifications)

2. To which part of the SPD or LDO are these comment intended to relate?

Page Paragraph / Figure

3. Please provide comments below.

The Trust suggests the amendment of the wording of the third sentence of paragraph 6A.29 to read as follows:
“These capacity estimates take account of constraints within the site allocation including Local Wildlife and Geological Sites, and the presence of priority habitats and protected species.”

COMMENT No 3

1. To which SPD or LDO are these comments intended to relate?

Core Strategy (Proposed Modifications)

2. To which part of the SPD or LDO are these comment intended to relate?

Page

Paragraph / Figure

3. Please provide comments below.

The Trust fully supports the wording of this paragraph of the policy.

Continue on a separate sheet if necessary...

Signature: Mike Collier

Date: 7th October 2014

14 POLICY CS11

Representations Relating to Policy CS11: Principal Reeneration Area - Knowsley Industrial and Business Parks

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS11 001	1	105	Matthew Dugdale, Emerson for Orbit
Total	1		

THE EMERSON GROUP

EST. OVER 55 YEARS

Planning Department

E-mail: [REDACTED]

PLANNING DEPARTMENT

DAVID W SHORT BSc DipTP MRTPI
GRAHAM A BEE BSc DipTP MRTPI
MATTHEW DUGDALE BA MCD MRTPI
KERREN J PHILLIPS BSc
TOM LOOMES BA (Hons) DipTP MRTPI
ANGELA DC PENNY

[REDACTED]
Local Plan Team
Knowsley MBC
1st Floor Annexe
Municipal Buildings
Archway Road
Huyton
L36 9YU

Our ref: MD/Planning

14 November 2014

Dear [REDACTED]

**RE: KNOWSLEY LOCAL PLAN CORE STRATEGY PROPOSED MODIFICATIONS,
AUTUMN 2014 – CONSULTATION RESPONSE ON BEHALF OF ORBIT
INVESTMENTS (PROPERTIES) LIMITED**

I am writing to provide comments on behalf of Orbit Investments (Properties) Limited regarding the above, which are set out on the attached, completed Representations Forms.

Orbit Investments (Properties) Limited, part of The Emerson Group, owns Academy Business Park, as illustrated by the attached Estate Plan (389-SCH-1019). The site is situated at a prime "gateway" location fronting Knowsley Industrial Park. At 10.79 hectares in size, it provides a key opportunity to contribute to the local economy through the adaptation of existing buildings and creation of new build premises fit for modern business needs.

Orbit's view is that the Local Plan Core Strategy with the Proposed Modifications is largely sound, subject to the changes requested in the attached Representations Forms. These objections relate to the location of the proposed "Services Hub" in Policy CS11 and the viability of sustainable and low carbon development in Policy CS22.

I would be grateful if you could confirm receipt of the attached comments. Should you wish to discuss any of these points in further detail, please do not hesitate to contact me.

Yours sincerely,

[REDACTED]
Matthew Dugdale
Planner

Enc. Proposed Modifications Representations Forms (Autumn 2014)
Estate Plan (389-SCH-1019)

DIRECTORS: PE JONES OBE (CHAIRMAN) ME JONES (DEPUTY CHAIRMAN)
AE JONES AC WEATHERBY BA (Law) (SECRETARY) J EDWARDS BSc (Hons) FCMA CGMA (FINANCIAL)
SP WILSON JP BURGESS BA (Hons) Law MST ROYLE BA (Arch) JR CLABER BSc (Hons)
NON-EXECUTIVE DIRECTORS: AJ WHITE BEng A JONES THE LORD LEE OF TRAFFORD DL FCA JP ALLEN ACIB DipFS
EMERSON DEVELOPMENTS (HOLDINGS) LTD

REGISTERED OFFICE [REDACTED]

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title		Mr
Name		Matthew Dugdale
Job Title (if appropriate)		Planner
Organisation (if appropriate)	Orbit Investments (Properties) Limited	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
a) Legally Compliant? (see guidance note 2.2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Sound? (see guidance note 2.3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Orbit support the reference to Lees Road as a “gateway” location, as requested in comment #1105 (December 2012).

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

N/A

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

14/11/2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
c) Legally Compliant? (see guidance note 2.2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Orbit agree with the need for a Local Service Centre (or “Services Hub”) at Knowsley Industrial Park. However, as previously stated in comment #1105 (December 2012), there is little justification for a local service centre to be located specifically at South Boundary Road. An application (11/00055/OUT) for mixed use development at the junction of South Boundary Road and Hornhouse Lane, including 1,115 sqm of commercial floorspace (use classes A1, A2, A3, A5 & D1), was refused by the Council 19th October 2011 for 3 reasons including: a detrimental impact on the viability and vitality of Kirkby Town Centre and loss of employment land without any regeneration benefit. As such, the policy as worded is not justified or effective.

Therefore, Orbit request that the location of the “Services Hub” be delegated to the Local Plan Site Allocations and Development Policies document, in order that full consideration can be given to suitability, availability and viability of sites. This is the approach taken by Policy CS6 (Town Centres and Retail Strategy) and reflective of NPPF paragraph 23, which should be mirrored by Policy CS11.1(d) in order to ensure consistency in approach across the Plan.

Academy Business Park, as identified on the attached Estate Plan (389-SCH-1019), could provide a suitable location for small scale shopping and services to serve the needs of the workforce. This would be a sustainable location which is highly visible, accessible and more sequentially preferable than the South Boundary Road site. In addition, the site currently benefits from implemented planning consents for a petrol filling station and drive-thru restaurant (04/00275/FUL & 04/00276/FUL), which are compatible uses to serve the needs of local businesses on the Park. The provision of such uses at the southern end of the site would not prejudice the wider redevelopment of the site for B8 warehousing and distribution.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

The text in Policy CS11.1(d) should be re-worded to remove specific reference to South Boundary Road and be replaced with a more generic location that can be defined by the Allocations and Development Policies document and Policies Map, as follows:

"d. A local service centre (or "Services Hub") at ~~South Boundary Road~~ A5208 County Road South/South Boundary Road/Moorgate Road/Arbour Lane/Lees Road, to provide small scale shopping and services to serve the needs of the workforce within the Park, will be defined on the Policies Map by the Local Plan Site Allocations and Development Policies document".

The last bullet point of paragraph 6.27 would also need amending accordingly.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

- c) No, I do not want to participate at any further public hearing
- d) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

14/11/2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Orbit Investments (Properties) Limited

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M210

Policy Ref

CS22.5

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|--------------------------|
| e) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Sound? (see guidance note 2.3) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Orbit support the removal of part 5 of the policy relating to Sustainable Construction Targets.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

N/A

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- e) No, I do not want to participate at any further public hearing
- f) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 14/11/2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
g) Legally Compliant? (see guidance note 2.2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Policy CS22 needs to include reference to the viability of delivery of sustainable and low carbon development.

Flexibility is required so that delivery of this policy does not make schemes unviable.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

As stated in comment #1105 (December 2012), Orbit request that the words "and/or viability" be inserted after the words "subject to feasibility".

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- g) No, I do not want to participate at any further public hearing
- h) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 14/11/2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|--------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| j) Sound? (see guidance note 2.3) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Orbit support the removal of the last sentence from part 6 of the policy relating to the payment towards independent scrutiny of submitted viability evidence.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

N/A

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

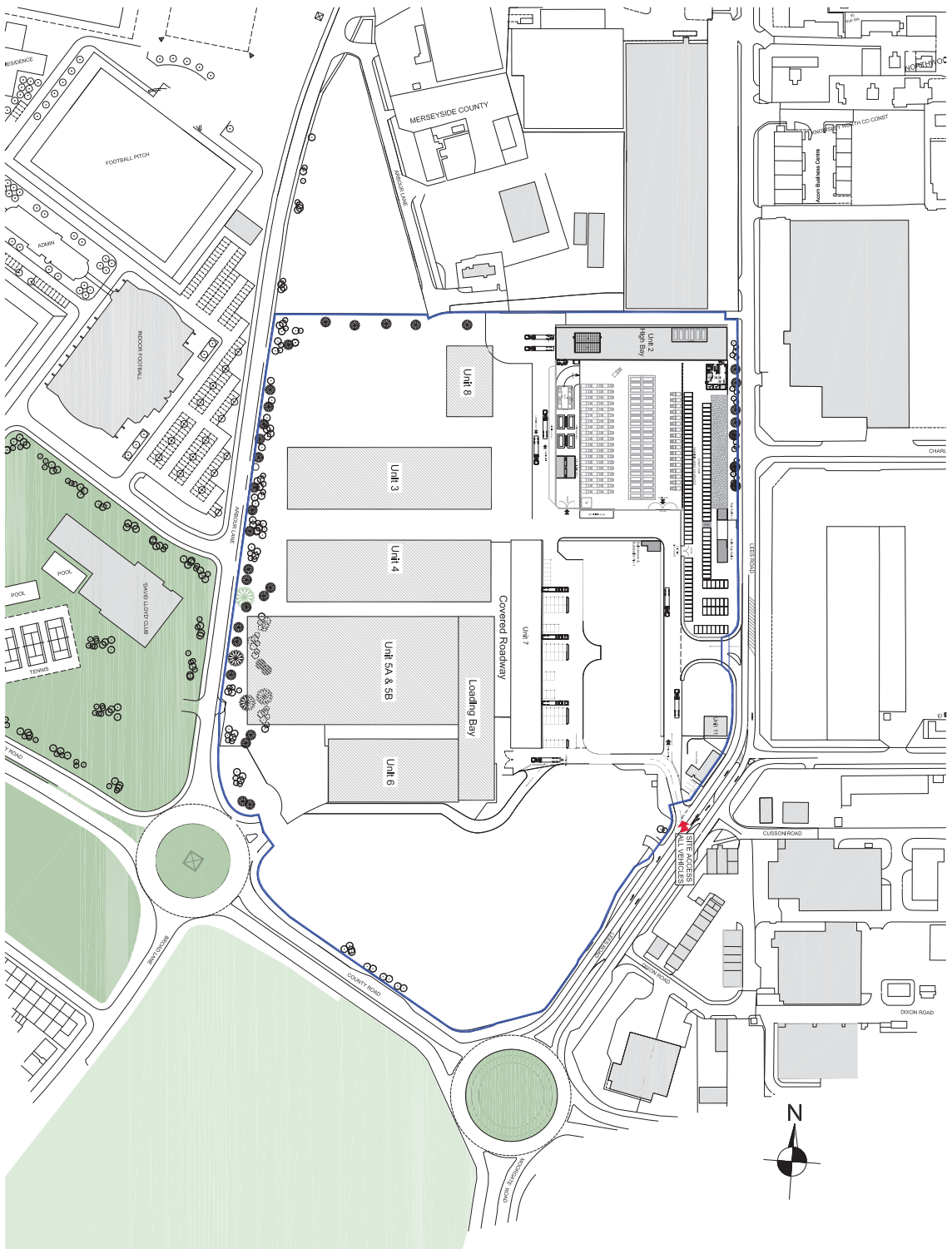
- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

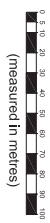


Date 14/11/2014



SITE PLAN scale 1:1250

This Contract is made for the purpose of providing a design and construction service to the client and the client's service providers. It is intended to be used for the purpose of providing a design and construction service to the client and the client's service providers. It is not intended to be used for any other purpose. It is not intended to be used for any other purpose. It is not intended to be used for any other purpose.



REV	DESCRIPTION	DATE

Orbit
Developments

ACADEMY BUSINESS PARK
KNOWSLEY

ESTATE PLAN

Scale: 1:1250 @ A1
Date: 10.10.14
Drawing No: 389-SCH-1019

15 POLICY CS14

Representations Relating to Policy CS14: Principal Regeneration Area - Prescott Town Centre

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS14 001	1	353	Keith Daw
Total	1		



Knowsley Council

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email:
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	KEITH DAW	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Positive preparation - infrastructure
- roads would be congested.
- Health + safety compromised.

Justified - use brownfield areas first
- most smaller brownfield areas have road infrastructure in place
- less overall effect on traffic
- improve local communities by regenerating unused local areas

effective - overcrowding the area - roads
- no access on Bypass - major safety risks

proposal - use Brownfield areas FIRST
- scotchbarn lane - school, Bicc, swimming baths
- old Bicc site *Continue on a separate sheet if necessary...* Spaces

- decline Home + Bargain New store
we don't need more big shops - use Prescot town
- use this space for needed housing

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I strongly object to the removal of GREENBELT areas for the Government to sell over protected Greenbelt areas to property developers for massive amounts of money and profits just to build houses when there are lots of brownfield sites still available.

It is logical to use brownfield areas for new houses and keep the protected Greenbelt areas for the local environment

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

13-11-14

16 PWCKV AREA

Representations Relating to the Area Priorities for Prescott, Whiston, Cronton and Knowsley Village

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
PWCKV	1	359	Keith Wooding
Total	1		



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

RETURNING THIS FORM

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- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Keith Wooding	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B 1- YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055 to
M065

Policy Ref

CS1, to CS5,
SUE

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Generally, the Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

It is disappointing that these proposals to build on Greenbelt at South Whiston have only just come to light despite claims that due consultation process has been followed. Public meetings with the Inspector should be re-convened to take into account the views of local residents in accordance with the provision of the Government in the Localism Bill.

It can be seen that the Knowsley Local Plan does not take into account the latest data from the Office of National Statistics (ONS) in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014. Furthermore, the plan, its strategy and objectives contain many conflicting and ambiguous statements, with little in the way of tangible deliverables. Often making reference to flawed and outdated supporting documentation.

Delivery of Strategic Objectives is not considered to be SMART, outputs are not 'measurable' and therefore cannot be seen as being 'achievable'. This in turn would cast doubt on the 'realistic' criteria.

On a personal note if I had submitted proposals for work, of this standard with this many grey areas, undefined & unquantified benefits with little substantive basis, I'd be shot.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature 

Date 11/11/14

PART B2 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
c) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP (updated October 2014) the Secretary of State for Communities, which states "Planners must protect our Green Belt" and "This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development". See link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. It is clear that no exceptional circumstances exist in Whiston.

The North West does not have the Housing shortage that London and the South east has, and as such removal of Greenbelt should not be considered in this case.

This objection to the release of green belt has also been raised as Knowsley council have not proven that all practical alternatives & Brown Field sites have been explored, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley plan fails to give high enough priority and consideration to the empty housing stock within the borough. Knowsley have a very poor record of bringing empty and derelict housing back into use. No reference can be found to any consultation with local housing trusts. Knowsley have not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touches Liverpool at Huyton and the proposals at South Whiston will bring urbanisation up to the boundary with St Helens. Likewise the proposal at Cronton will bring Knowsley closer to Halton. This is NOT consistent with National Policy.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

c) No, I do not want to participate at any further public hearing

d) Yes, I wish to participate at any further public hearing

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Signature



Date

11/11/14

PART B3 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| e) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

In relation to KGBS14 South of Whiston. This policy is contrary to Strategic Objective 8, CS5, CS8 & CS21. Either the principles set out in SO8 are adhered to, or the land is used for development.
As stated in CS5 and CS8, it cannot meet both opposing policies. In fact C21 8.21-8.26 reduce to the point of being ineffective the relevance of CS3 and the requirement to release Green Belt land for development at all.

Given that there are prime areas of land around Prescot & Huyton that previously have been earmarked for housing yet lie undeveloped for a number of years indicates that Knowsley model for predicting the number of houses that will need to be built and the land required is flawed.

If the model was correct those areas would have been redeveloped. This proves that there is no justification to release Green Belt land except for Knowsley council financial benefit.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

e) No, I do not want to participate at any further public hearing

f) Yes, I wish to participate at any further public hearing

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Signature



Date

11/11/14

PART B 4– YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
g) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to the area south of M62. The proposed September modifications took the emphasis off investment in existing locations and placed it firmly on the 'new'. This indicates that Knowsley have little or no appetite to fill the empty space in Huyton Business park and empty units on nearby Fallows Way.

A ten minute drive round Huyton Business Park will show how much unused land or empty unit/buildings are available. The occupancy level is one area where there are inaccuracies in the supporting documentation.

The area south of M62 doesn't need more employment locations, it just needs the existing areas to realise their full potential. Proper effective management would achieve this whilst allowing other Core Objectives to be met.

Clearly the site has potential, as recently a developer acquired a large site for redevelopment.

For Fallows way, it is believed that two of the three units are un occupied at present. If the remaining occupant could be encouraged to relocate to Huyton Business Park, the whole of Fallows Way could be given over to housing. Reducing further the need to use Green Belt land. This would have the added benefit of reducing the number of large lorries that use Windy Harbour Road daily and hence congestion.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

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Signature



Date

11 / 11 / 14

PART B5 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to KGBS14 South Whiston, there is very little mention of provision for new local centre, expansion or regeneration of existing local shops

As for 6.45, the policy is flawed and mostly irrelevant. This highlights lack of understanding of local issues. In turn this suggests that Knowsley have taken a 'one-solution-fits-all' approach. This element of the core strategy cannot be met.

Little mention is made of requirement for additional facilities such as health care or clinic, GP surgeries and dentist. Nursery and school requirements are also not described.

No reference was found to alternative policy documents that would detail these requirements, which suggests that no additional pre-school or school facilities are planned to meet huge increase in demand for services from such a large housing development. Similarly no additional health care provision. A number of strategic objectives will not be met

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 12/11/14

PART B6 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M112

Policy Ref

CS7

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| k) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| l) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With reference to KGBS14 South Whiston area.

Improvements to existing rail network, enhancements to stations.

As a regular train user from Whiston Station, Network Rail have been observed undertaking a passenger survey. This is with a view to CLOSE Whiston station. How does that help meet the transport policy? Clauses 1a, 1c, 2b, 3b, 3e

Also, and contrary to supporting documents, bus routes and times have been revised to the effect of after evening rush hour a minimal number buses are running. This will prevent a number of clauses from being met.

This removes choice, a key policy objective.

In reality this will manifest itself as people making greater use of personal car or cars. This will further bring the transport policy into disarray and have a negative impact on other perceived benefits & strategic policies

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14