



Knowsley Council

Knowsley Local Plan: Core Strategy

Accounting for Proposed Modifications Representations

February 2015

CONTENTS

CHAPTER	TITLE	PAGE
	<i>(NB - policy references are to those in the Knowsley Local Plan: Core Strategy)</i>	
00	INTRODUCTION	1
01	NO COMMENT	3
02	CONSULTATION	4
03	DUTY TO COOPERATE	19
04	POLICY CS1	20
05	POLICY CS2	21
06	POLICY CS3 HOUSING TARGET	22
07	POLICY CS3 HOUSING LAND SUPPLY	28
08	POLICY CS4 EMPLOYMENT TARGET	57
09	POLICY CS4 EMPLOYMENT LAND SUPPLY	62
10	POLICY CS5	70
11	POLICY CS6	71
12	POLICY CS7	73
13	POLICY CS8	76
14	POLICY CS11	79
15	POLICY CS14	81
16	PRESCOT, WHISTON, CRONTON AND KNOWSLEY VILLAGE AREA	82
17	SUSTAINABLE URBAN EXTENSIONS (GENERAL)	83
18	BANK LANE, KIRKBY	95
19	EAST OF KNOWSLEY INDUSTRIAL PARK	97
20	KNOWSLEY LANE, HUYTON	100
21	EDENHURST AVENUE, HUYTON	111
22	LAND BOUNDED BY A58, PRESCOT	123
23	CARR LANE, PRESCOT	132
24	EAST OF HALEWOOD	138
25	SOUTH WHISTON & LAND SOUTH OF M62	149
26	SAFEGUARDED LAND - KNOWSLEY VILLAGE	177
27	OTHER SITES	188
28	POLICY CS15	192
29	POLICY CS17	197
30	POLICY CS20	198
31	POLICY CS21	199
32	POLICY CS22	200
33	POLICY CS24	202
34	POLICY CS25	207
35	POLICY CS27	208
36	APPENDIX D	210
37	SUSTAINABILITY APPRAISAL	211
38	HABITATS REGULATION ASSESSMENT	226

List of abbreviations used in this document

AQMA	Air Quality Management Area
BMV	Best and Most Versatile
BREEAM	Building Research Establishment Environmental Assessment Methodology
CPRE	Campaign to Protect Rural England
DCLG	Department for Communities and Local Government
DEFRA	Department for Environment, Food and Rural Affairs
dpa	Dwellings per annum
dph	Dwellings per hectare
EVA	Economic Viability Assessment
FAQs	Frequently asked questions
GB	Green Belt
GI	Green Infrastructure
HCA	Homes and Communities Agency
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
IHLS	Interim Housing Land Supply
IPALA	Inspectors Interim Preliminary Assessment of Land Availability
KLPCS	Knowsley Local Plan: Core Strategy
LCR	Liverpool City Region
NPPF	National Planning Policy Framework
ONS	Office for National Statistics
PRA	Principal Regeneration Area
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SPD	Supplementary Planning Document
SUE	Sustainable Urban Extension
THI	Townscape Heritage Initiative
UDP	Knowsley Replacement Unitary Development Plan

0. Introduction

- 0.1 This document summarises the main issues raised by representors in their written responses to the public consultation on Proposed Modifications to the Knowsley Local Plan Core Strategy (“**the Plan**”), undertaken from September to November 2014.
- 0.2 A separate document, known as the Report of Representations (Knowsley MBC, 2014) sets out the full text of all of the responses received to the consultation.
- 0.3 This document should also be read in conjunction with other documents which have been published in connection with the Plan. These can all be viewed on the Examination in Public section of the website at www.knowsley.gov.uk/localplan.
- 0.4 This document is set out in a number of chapters, each relating to a specific part of the Plan or related issue. The representations received which relate to each part of the Plan or broad issue have been collated in each chapter. Where a representation raised a number of issues, these have been presented under multiple chapter headings.
- 0.5 In this document, the Council has summarised the main issues raised for each chapter heading. Many of the representations received raised the same or very similar issues, so these have been addressed as one main issue.
- 0.6 Each of the main issues raised in relation to each topic or part of the Plan (e.g. Policy CS1, Policy CS2, Consultation) are listed in table form. To assist the consideration of the responses during the remainder of the Examination in Public of the Plan, the Council has inserted comments about each issue raised. This position is supplemented with explanatory text assessing and where appropriate identifying existing evidence which is relevant to each comment.
- 0.7 In some cases, the consultation response did not include any request to change the Plan, or raised matters which have either already been resolved in the Plan or which are not relevant to the Plan. The Council’s comments make it clear where it considers this to be the case.
- 0.8 The Council has made this report available for public inspection. This is to help representors and the Inspector consider the representations submitted at the Proposed Modifications stage.
- 0.9 **Whilst this document does not identify at this stage any further modifications to the Plan, it should be noted that the Council has not to date made a formal decision about whether such further modifications may be needed. The Council will welcome further consideration of the issues as part of the on-going Examination in Public of the Plan. This document is intended to help inform this process, including during the new hearings which are expected to take place in summer 2015. Should**

a need be identified for further Main Modifications to the Plan these would need to be formally approved by the Council's Cabinet and made subject to a further period of public consultation. Any subsequent decision to finally adopt the Plan (with or without further modifications) would need to be made by a meeting of the full Council.

01 NO COMMENT

01 NO COMMENT

- No comment – duty to co-operate

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
No comment – duty to co-operate	Spirit of ongoing co-operation between our authorities, we would be most grateful if you would continue to engage in the preparation of the Knowsley Local Plan.	The Council intends to continue to inform and involve neighbouring authorities, duty to co-operate partners and other stakeholders in the preparation of the Knowsley Local Plan. The Council has produced a Duty to Cooperate Statement which outlines the cooperation with the relevant bodies undertaken to date (Examination library reference SD14 and SD30).

02 CONSULTATION

02 CONSULTATION

- Consultation – Soundness and Legal Compliance Issues – General
- Consultation – Compliance with Statement of Community Involvement
- Consultation – Proposed Modifications Consultation – Timescales
- Consultation – Proposed Modifications Consultation – Community Awareness
- Consultation – Proposed Modifications Consultation Materials – Nature of Documents
- Consultation – Proposed Modifications Consultation Materials – Document Availability
- Consultation – Proposed Modifications Consultation Materials – Response Forms
- Consultation – Proposed Modifications Consultation Materials – Site Notices
- Consultation – Proposed Modifications Consultation Materials – Letters
- Consultation – Proposed Modifications Consultation Materials – Events
- Consultation – Previous Consultation – General
- Consultation – Previous Consultation - Accounting for Previous Views
- Consultation – Previous Consultation – Leaflets
- Consultation – Previous Consultation – Methods
- Consultation – Consultation with Other Bodies
- Consultation – Future Hearings
- Consultation – Future Consultation

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Consultation – Soundness and Legal Compliance Issues - General	<p>The Plan is unsound and not legally compliant due to:</p> <ul style="list-style-type: none"> • The consultation has failed and must be legally challenged • There has been insufficient consultation. Residents have not been fully informed of the 	<p>The consultation undertaken on the Local Plan, including at the Proposed Modifications stage and all previous stages has been legally compliant. Evidence is set out in: the Reports of Consultation from the “Issues and Options” and “Preferred Options” stages (Examination library references SD04, SD05 and SD05A); Statement of Previous Consultation, which</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>whole process</p> <ul style="list-style-type: none"> • Plans should be based on evidence of participating of the local community and others having an interest in the area • The Plan was not positively prepared as it was against the wishes of the community • There has been a serious lack of communication and dialogue with local residents and community groups • Consultation period afforded to residents has not fulfilled the required time scale • There being minimum engagement with residents. Is there not a legal obligation for officers to overcome in order to attempt to engage with the majority? 	<p>summarises the consultation undertaken by the Council up to when it submitted the KLPCS to the Government in July 2013 (Examination library reference SD01); and Report of Consultation and Report of Representations at the Proposed Modifications stage (Examination library reference SD33 and SD34a to 34h). This is further summarised in the Note on Previous Consultation Stages produced by the Council in January 2015 (Examination library reference EX36).</p>
<p>Consultation – Compliance with Statement of Community Involvement</p>	<p>The Proposed Modifications Consultation has not complied with the Statement of Community Involvement. The Council should adhere to this, including elements which state “community involvement is more than a box ticking exercise and will require ongoing commitment”; “respecting people’s involvement”; “potential measures to engage hard to reach groups”.</p>	<p>The consultation undertaken on the Local Plan, including the Proposed Modifications stage and all previous stages, has been in accordance adopted Statement of Community Involvement. Evidence is set out in the Reports of Consultation from the “Issues and Options” and “Preferred Options” stages (Examination library references SD04, SD05 and SD05A); Statement of Previous Consultation, which summarises the consultation undertaken by the Council up to when it submitted the KLPCS to the Government in July 2013 (Examination library reference SD01); and Report of Consultation and Report of Representations at the Proposed Modifications stage (Examination library reference SD33 and SD34a to 34h). This is further summarised in the Note on Previous Consultation Stages produced by the Council in January 2015 (Examination library reference EX30).</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Consultation - Proposed Modifications Consultation - Timescales	Not enough time was allocated for objection, specifically: <ul style="list-style-type: none"> • Residents of Knowsley Village had six weeks to digest the impact of a plan the Council has been planning for over six years • The notice given by the Council with restrictive parameters does not intend to give people of Knowsley Village sufficient time to express their concerns, have consultations, or even offer alternative solutions. 	At each consultation stage, the Council has met or exceeded the minimum consultation period specified in the relevant legislation. At the Proposed Modifications stage, there was an 8 week consultation period (2 weeks in excess of the 6 week minimum). Therefore, there has been sufficient time for consultation responses to be prepared and submitted. This matter is addressed in the Note on Previous Consultation Stages produced by the Council in January 2015 (Examination library reference EX36).
Consultation – Proposed Modifications Consultation – Community Awareness	The Council’s activities did not sufficiently raise community awareness and foster community involvement, including: <ul style="list-style-type: none"> • Doing the minimum required to communicate the process to the public renders the consultation process flawed and unacceptable • The community has not been involved in drawing up the proposed modifications. • Residents have not been contacted in time to make a difference to the Plan • Awareness has been raised with the community through community groups and online pages • It has only been a local campaign that has seen the population informed • The consultation was only highlighted through reading about it on social media, through volunteers posting leaflets and through forming a committee • Local communities have not been sufficiently targeted. Many people still have no idea it is 	The Council has taken appropriate steps at this Proposed Modifications consultation, as at previous stages, to raise awareness within the community about the proposals within the Plan. The Council contests that the community have not been sufficiently consulted at this stage. As set out above the Council’s activities have been in accordance with legal requirements and in compliance with the Statement of Community Involvement.

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>going on. People cannot object if they don't know about it</p> <ul style="list-style-type: none"> • Knowsley Village community have felt marginalised in the planning process, which may not involve any further hearing of the representations made • There can be no consultation, only presentation – to be involved is not the same as being presented with Plans. • The Council's proposal served with no initial contact with residents, and is simply rolled out over people with no consideration for how it will affect residents. • The Council has sprung these plans on local residents, who feel they are being misled. • Members of the public are not being told the truth about the overall effect on public quality of life 	
<p>Consultation – Proposed Modifications Consultation Materials – Nature of Documents</p>	<p>Consultation materials have caused issues, including:</p> <ul style="list-style-type: none"> • There has been too little information given to local residents • A simplified outline document should have been produced • Those that are trying to get to grips with what's happening cannot possibly get up to speed with all the reading, documents and modifications that have taken place • Residents are faced with a very confusing and overly jargon packed application that makes it 	<p>There are many documents associated with the Local Plan Core Strategy, some of which are necessarily very long and complex in nature. The Proposed Modifications Consultation was focussed only on the proposed changes to the Plan, which were presented in a schedule. The Council also presented these in a "tracked changes" version of the Plan, so that the modifications which were the subject of the consultation were easier to identify. The Council did not consider producing a simplified leaflet, but this would have detracted from the nature of the consultation which was focussed on the proposed modifications only.</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>an intimidating process</p> <ul style="list-style-type: none"> • Details of the Plan and proposed modifications are too dense, meaning response forms cannot be completed properly, making objections and concerns invalid within the legal process • Local residents are being misled about proposals for land at Knowsley Village, which will be released before 2028 • Documents available filled a large crate and were technical and legalistic, hence not accessible for members of the public without time or experience to study documents. • The information on the website was not clear or specific as to how proposals will impact particular homes 	<p>Recognising the complexity of the consultation materials, the Council arranged a series of drop-in events, where members of staff were available to answer questions. Staff members were also available by telephone and e-mail for the duration of the consultation period during office hours. The Council produced a response form and guidance note, to assist in the submission of representations. The Council has used an FAQs leaflet throughout the Plan preparation process to provide simple explanations to questions often asked.</p>
<p>Consultation – Proposed Modifications Consultation Materials – Document Availability</p>	<p>There were issues with availability of materials, including:</p> <ul style="list-style-type: none"> • The One Stop Shop staff were unaware that they had the information to provide to people. • There was no publicity about the Plan in the One Stop Shop • Difficulty in obtaining Representations Forms from the local library and One Stop Shop • Links on the website were down for the first three weeks of the consultation process, which is why local residents had to take their own time and money to print hard copies of response forms for their neighbours. • Although information may exist at a specified web address, a lot of residents are unaware of it 	<p>Staff in the One Stop Shops and Libraries were briefed about the availability of materials, including consultation documents and Response Forms.</p> <p>It is acknowledged that many Knowsley residents do not have access to the internet. Hence, the Council has made key consultation documents available in all Council One Stop Shops and libraries for the duration of the consultation period. One Stop Shops and Libraries also host computers with internet access, on which documents could be accessed. Hard copies of all examination library documents were available to view on request at the Council offices in Huyton.</p> <p>The Council was not aware that there were any specific issues with its website during the consultation period.</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	and some do not have access to or use the internet in the first place	
Consultation – Proposed Modifications Consultation Materials – Response Forms	Issues were encountered with the Response Forms and Guidance Notes produced by the Council, including: <ul style="list-style-type: none"> • The consultation response form is a legal document that would be impossible for a layman to outline their objections • The Response Form is not a people friendly form and should have been simplified for ordinary people • Reject section 1.3 of the Guidance Notes which state that comments are sought specifically on the proposed modifications, on the grounds that the Council’s claims that enough people were informed of the process are unfounded, with thousands of others being completely unaware of the Consultation process • Few people knew of the correct form to complete 	<p>A standard Response Form and Guidance Notes was provided to assist representors in submitting a representation. The form was necessarily detailed, as the Council sought to encourage representors to set out their representations in the most effective way, i.e. focussing on issues of soundness and legal compliance, and including clear guidance notes for this.</p> <p>The Proposed Modification consultation focussed only on parts of the Plan which were subject to change following the progress of the Examination in Public to date. This was clearly stated in all consultation materials. The Guidance Notes also reflected this, therefore it is not considered appropriate to reject them.</p> <p>The Council sought to raise awareness about the availability of the Response Form throughout the consultation period. The Response Forms were available on the Council’s website, at One Stop Shops and Libraries, and at all drop-in events.</p>
Consultation – Proposed Modifications Consultation Materials – Site Notices	Issues were encountered with the site notices that the Council placed in close proximity to the locations proposed to be allocated as Sustainable Urban Extensions. These issues included: <ul style="list-style-type: none"> • The public notices were unfit for purpose throughout the development of this plan, however legally compliant they may have been • Site notices should have been displayed in more locations and secured properly 	<p>The Council chose to place site notices in close proximity to each of the proposed Sustainable Urban Extensions. These notices were affixed to lampposts or fences as close as possible to the perimeter of the site. The notices were placed in the most appropriate locations for public viewing, with up to ten notices being used for some sites. The notices included all of the relevant information relating to the Proposed Modifications consultation, including a map of the proposed site allocation, and details of where further information could</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Signage around the proposed sites for removal from the Green belt do not sufficiently inform local residents who live outside the 200m notification zone • The Knowsley Park Lane lamp post notice and letter received by some residents never appeared in Park Road, even though the proposal is in the vicinity • For land bordered by the A58 / Knowsley Park Lane, there did not appear to be any visible public notices on display for the entire stretch of the main road perimeters • Site notices at Edenhurst Avenue were not seen by vehicle users • There were no signs to indicate a planning order on the Sarum Road side of the Edenhurst Avenue site 	<p>be found, i.e. on the Council's website, or at drop in events. Contact details for representations to be sent to where also given, along with a telephone number and email address for further information. The site notices played an important role in notifying those who may not have received a letter directly from the Council at the Proposed Modifications stage.</p> <p>The Council can confirm that site notices were placed at the Land bounded by A58 and Edenhurst Avenue sites. The latter included a notice placed on the Sarum Road (Liverpool) side of the site.</p>
<p>Consultation – Proposed Modifications Consultation Materials – Letters</p>	<p>Issues were encountered with the consultation letters that the Council sent out at the commencement of the consultation period, including:</p> <ul style="list-style-type: none"> • The Plan is not justified as there was no consultation with local residents by letter • Some people within the 200m buffer of the proposed site have not been informed at all. • A wider catchment of people should have been informed • All Knowsley Village residents should have been notified of proposed changes to Green Belt, having particular regard to the 	<p>At the Proposed Modifications stage, the Council contacted directly by letter or e-mail the members of the Local Plan consultation database, those who had previously been involved in the Local Plan preparation process, and those whose addresses were within 200m of the proposed Sustainable Urban Extensions (SUEs) or safeguarded land. The rationale for including targeted neighbour letters at this stage was that site allocations (rather than broad locations for later allocation) were now being proposed. The decision was taken to utilise a 200m buffer around each site to send letters. Other measures were used to publicise the proposals to those living in the wider area. Further detail is set out in the Note on Previous Consultation Stages published by the</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>Government's commitment to deliver real local democracy through the Localism agenda</p> <ul style="list-style-type: none"> • A resident from Knowsley Lane who was legally entitled to be consulted has not been consulted. • Consultation ignored 80% of the residents directly affected, leaving them uninformed • Approximately 80% of residents from Knowsley and Liverpool (boundaries) remain uninformed. 	<p>Council in January 2015 (Examination library reference EX36).</p>
<p>Consultation – Proposed Modifications Consultation Materials – Events</p>	<p>Issues were raised with regard to the events held as part of the Proposed Modifications consultation, including:</p> <ul style="list-style-type: none"> • General knowledge of meetings regarding housing development and recent drop in meetings were not circulated • There have been no public meetings or forums, only a drop-in event which provided scant information • The only public consultation was a drop-in event at the Halewood Centre where boards were displayed and Council officers were made available to answer questions. This is not consultation. • Consultation meetings haven't answered questions, only served up more confusion and contempt • At the consultation event, there was no information on how the site would look, there were no planners or members of the council there • Members of the public were told that some 	<p>At the Proposed Modifications stage, the Council held seven public drop-in events around the Borough. These were publicised within a range of consultation materials, including letters/emails, site notices, posters and the Council's website. The claim that there were no consultation events is therefore incorrect. The drop-in event format was deemed the most appropriate, allowing members of the public to attend at any time during a three hour period over later afternoon / early evening, and speak to members of the Local Plan team. The team were on hand to explain the consultation process, answer any questions, and distribute response forms to attendees. Therefore, the claim that there were no officers at the event is incorrect. Some event attendees were frustrated with the format, or that there was insufficient detail of how the SUE sites would be developed, for example in terms of site layout, housing mix, or access points. However, this is a result of the stage of Plan preparation, and is unknown in advance of a planning application, rather than any attempt to disguise known details.</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	questions cannot be answered	
Consultation – Previous Consultation – General	<p>Issues were raised with respect to how the Council has undertaken previous consultation on the Local Plan, including:</p> <ul style="list-style-type: none"> • Council has not consulted at previous stages of plan preparation • At no stage have the residents of the areas affected been consulted about the removal of green belt • Loop holes have been used to pass this decision with little or no appropriate consultations with residents • Council’s consultation at previous stages of plan preparation has been insufficient and inconsistent • Members of the public would have liked to attend the public hearing sessions • Disappointing that the Council failed to publicise the examination of the Core Strategy more widely in 2013 and advertise more comprehensively the modification document in 2014 • No discussion of changes at Knowsley Town Council, despite the fact that Town Councillors are Borough Councillors and had attended Council meetings where reports were discussed and voted on • The Plan has been under consideration for some time, yet it is only just being brought to public attention. 	<p>The Council has consulted extensively at previous stages of Local Plan preparation. Evidence is set out in the Reports of Consultation from the “Issues and Options” and “Preferred Options” stages (Examination library references SD04, SD05 and SD05A); Statement of Previous Consultation, which summarises the consultation undertaken by the Council up to when it submitted the KLPCS to the Government in July 2013 (Examination library reference SD01).</p> <p>The Council contests any claims that Plans were deliberately concealed from residents. All relevant information has been made available in the public domain, and no particular areas have been excluded from the Plan preparation process.</p> <p>Members of the public with valid representations who feel they would have liked to attend the previous hearing sessions to make representations to the Inspector may be invited to participate in re-convened hearings.</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • The considerations of residents living in affected areas have not been sought • No recollection of being informed of the Examination in Public or hearing sessions. • Huge swathes of people concerned and affected by the Local Plan have not been informed of the consultation until after key phases were completed, therefore those phases cannot be considered to be valid. • There is a lack of understanding about options generation, as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision. • Property purchased in July 2014, with no mention of the pending action. • Nobody in the area has been aware of previous consultations. This has given the appearance that the Council did not wish people to be made aware of their intentions, as they knew residents would be against them. 	
Consultation – Previous Consultation - Accounting for Previous Views	Issues were raised about how the Council has accounted for previous comments and representations from the public within the Plan preparation process, including: <ul style="list-style-type: none"> • The Local Plan has not been prepared with the participation of the greater local community • The “planning application” by the Council is not justified as they have not listened or attempted to seek the views of the local people 	The detail of how the Plan has been prepared is set out in the Reports of Consultation from the “Issues and Options” and “Preferred Options” stages (Examination library references SD04, SD05 and SD05A); Statement of Previous Consultation, which summarises the consultation undertaken by the Council up to when it submitted the KLPCS to the Government in July 2013 (Examination library reference SD01); and Report of Consultation and Report of Representations at the Proposed Modifications stage

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> The proposal has not taken into account local resident concerns and therefore cannot be considered justified or sound, as residents have been excluded from proposals 	<p>(Examination library reference SD33 and SD34a to 34h). Specific details of responses to the representations received at the Preferred Options and Proposed Submission stages are available within the Accounting for Preferred Options Consultation document (Examination library reference SD17) and the Statement of Previous Consultation (Examination library reference SD01). Therefore the claim that the Council has not accounted for the views of local people is contested.</p>
<p>Consultation – Previous Consultation - Leaflets</p>	<p>Issues were raised about the distribution of consultation leaflets at the Issues and Options and Preferred Options consultation stages, including:</p> <ul style="list-style-type: none"> Many information brochures were not received by households; the Council is aware of this. The Council admitted that the company used did not deliver all of the pamphlets it should have KMBC acknowledged that thousands of leaflets had not been delivered Knowsley Council have failed in their due diligence to inform the local population of the proposed plans. They themselves have accused Royal Mail of failing to deliver notifications; however there has been no pressure or charges brought forward for tampering with the mail. There were no leaflets put through the door, even though the Council said they did. Understand that post goes astray, but people who should have been informed were not 	<p>This matter is addressed in the Note on Previous Consultation Stages produced by the Council in January 2015 (Examination library reference EX37).</p> <p>At the “Issues and Options” stage the Council received some evidence that the distribution of leaflets which was undertaken by a third party company may not have been undertaken to all residential addresses in all parts of the Borough as intended. This was the only instance of the Council using this third party company.</p> <p>The Council addressed this issue by using the Royal Mail (i.e. a new supplier) to distribute leaflets aimed at all residential addresses at the subsequent Preferred Options stage. Therefore, if there were any residential addresses that did not receive a leaflet because of distribution issues at the Issues and Options stage, it has taken appropriate steps to rectify this by using an alternative supplier to distribute leaflets at the Preferred Options stage.</p> <p>In terms of legal compliance it should be noted that there is no requirement in either the national regulations or the</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>Council’s Statement of Community Involvement (“SCI” – see Examination library reference PP15) for the Council to send leaflets or other forms of communication to all households at any stage in preparing the Knowsley Local Plan: Core Strategy.</p> <p>At each consultation stage, the Council has met or exceeded the minimum consultation requirements specified in the relevant legislation and the Council’s SCI - see document EX37 for specific details.</p>
<p>Consultation – Previous Consultation – Methods</p>	<p>Issues were raised with respect to how the Council has undertaken previous consultation on the Local Plan, including the methods used at previous stages, including:</p> <ul style="list-style-type: none"> • A proper public meeting has never happened either in Bowring Park or for any other sites. The last meeting of Bowring Residents Association was in November 2012 • There has been no Q and A session or organisation structured meeting • Members have not answered the repeated call for public meetings to be convened in the Roby Ward. • There were no previous Local Plan public notices • The five 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. • The Council has made no effort to advertise the 	<p>The Council selected a range of consultation methods to use at each stage of consultation on the Local Plan. These methods were selected in accordance with the guidance within the Statement of Community Involvement. Evidence is set out in the Reports of Consultation from the “Issues and Options” and “Preferred Options” stages (Examination library references SD04, SD05 and SD05A); Statement of Previous Consultation, which summarises the consultation undertaken by the Council up to when it submitted the KLPCS to the Government in July 2013 (Examination library reference SD01).</p> <p>The leaflet distributed to households at Preferred Options stage in 2011 clearly identified the broad locations where Green Belt release was proposed.</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>Green Belt status changes despite items in the Knowsley Challenge and Knowsley News</p> <ul style="list-style-type: none"> Residents have never been informed by letter by the Council or local Councillors. 	
<p>Consultation – Consultation with Other Bodies</p>	<p>The way in which the Council has consulted with other organisations and bodies was mentioned, including:</p> <ul style="list-style-type: none"> There is no reference to consultation with housing trusts There has been no consultation with bordering Councils. Liverpool consider the large amount of Green Belt release to be too much and premature. It is unclear what efforts have been made by Knowsley Council to engage in the preparation of the Liverpool Local Plan. 	<p>The Council has consulted with a range of organisations throughout the preparation of the Plan. This includes housing trusts such as Knowsley Housing Trust and Villages Housing Trust, as well as all neighbouring local authorities, who have been consulted at each plan preparation stage. Liverpool City Council have no outstanding objections to the content of the Plan, and consider that the Council has complied with its Duty to Cooperate with the City Council. The Council is a consultee for the Liverpool Local Plan, and is committed to continued cooperation with the City Council on all strategic planning matters.</p>
<p>Consultation – Future Hearings</p>	<p>The matter of future hearings was raised, including:</p> <ul style="list-style-type: none"> Public hearings should be reconvened, with participation from members of the community and local residents Public hearings should be reconvened due to the poor performance of the Council in letting the public know. The Inspector should convene another public meeting as residents were not able to understand the jargon and technical issues at the first consultation Invitation to the Inspector to arrange a hearing of the representations against the proposals to remove land at Knowsley Village 	<p>The Council notes the requests for further public hearings to be convened. It has confirmed (and the Inspector has agreed) that this is an appropriate course of action. The draft programme and arrangements for the new hearings are expected to be publicised in the near future (see correspondence in Examination library reference EX34-36).</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • A structured meeting should be arranged with a member of Central Government, as local government representations are incapable or have limited capacity to carry forward the expectations of the local community 	
Consultation – Future Consultation	<p>Suggestions were made as to how future consultation on the Local Plan should be undertaken, including:</p> <ul style="list-style-type: none"> • Future consultation should include organisation consultation and meetings • A referendum is required as the outcome of a transparent plan preparation process • Consultation should be more wide ranging than the minimum required by law • Wide consultation required to determine needs, requirements and information • Further consultation with reference to historical changes in societies / localities which were chopped out at whim and destroyed • To make the Plan legally compliant, the modification to Sustainable Urban Extension (at Prescot) should be subject to consultation with all residents of Prescot, the Historic Society, and THI. • The Council should let the people have a voice in determining what happens to the Green Belt and should not allow changes in the Green Belt to be led by developers • Public consultations should be quicker and better, including more advertisement, to inform 	<p>The suggestions about how future consultations can be undertaken are noted. The Council intends to review the Statement of Community Involvement in due course, and part of this process will be to review the suggestions made to ensure consultation with local communities remains effective. The Council's consultation on the Local Plan Core Strategy to date has met and in some respects exceeded the requirements of the law and its existing Statement of Community Involvement. It has also already used many of the methods of consultation listed here, including meetings/events, the use of leaflets, consultation with community groups, etc.</p> <p>It would be inappropriate to reconvene a period of public consultation at this stage. This is because the Proposed Modifications consultation stage has only recently concluded, and the next stage of the Examination process is currently being arranged. There will be a further stage of public consultation on this Plan, only if there are further modifications required to make the plan sound and legally compliant. Subsequent Local Plan documents will be subject to their own multi-stage consultation processes.</p>

02 CONSULTATION

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>the public</p> <ul style="list-style-type: none"> • The plan should be more publicised by more leaflets • There should be more in depth consultation as to what might happen next • There should be a review as there are currently numerous new community groups that were not previously involved in the consultation. • The Council should consider re-convening the public consultation process to take note of the views of local residents and the numerous new community groups • The consultation should be restarted with all addresses within the Borough and just outside notified, ideally put in with Council Tax demands. This should therefore include all communities for whom the Local Plan is for and to be fully included in the making of the Plan if they so wish • Every household in the Borough should be mailed and to save costs enclosed with the Council tax and rate demands • There is a need to start the Plan preparation process again, and inform residents from the beginning 	

03 DUTY TO COOPERATE

03 DUTY TO COOPERATE

- Duty to Cooperate – Consultation with neighbouring authorities
- Duty to Cooperate – Consultation with Liverpool City Council
- Duty to Cooperate – Vacant properties in Liverpool

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Duty to Cooperate – General consultation with neighbouring authorities	Lack of consultation with neighbouring Councils, specifically St Helens and Halton which may be able to take up some of Knowsley’s housing requirement	The Council has consulted with all neighbouring local authorities at each stage of Plan preparation. The Council has produced a Duty to Cooperate Statement which outlines the cooperation with the relevant bodies undertaken to date (Examination library reference SD14 and SD30).
Duty to Cooperate – Consultation with Liverpool City Council	Liverpool City Council consider that the amount of Green Belt release proposed is too much and may be premature	Liverpool City Council has no outstanding objections in place in relation to the Plan. This is evidenced within the Council’s Duty to Cooperate Statement (Examination library reference SD14 and SD30).
Duty to Cooperate – Vacant properties in Liverpool	Should take greater account of unused buildings / houses in Liverpool, specifically the Norris Green, Toxteth and L8 postal area.	The matter of whether a neighbouring authority could meet any of Knowsley’s housing requirement has been considered at length throughout the Plan preparation process. Earlier evidence demonstrated that this did not form a practicable solution to meeting Knowsley’s housing needs. Further explanation is given within the Council’s Duty to Cooperate Statement (Examination library reference SD14 and SD30).

04 POLICY CS1

04 POLICY CS1

- Policy CS1: Proposed modification - M042
- Policy CS1: Proposed modification - M045

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS1: Proposed modification - M042	Support 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.	Comment noted - no response required.
Policy CS1: Proposed modification - M045	Support 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.	Comment noted - no response required.

05 POLICY CS2

05 POLICY CS2

- Policy CS2: Proposed modification - M050

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS2: Proposed modification M050	Support for the proposed modification M050 – amendment to Policy CS2 Principle 4i, relating to addressing issues of unstable land resulting from Knowsley’s legacy of minerals extraction.	Comment welcomed – no response required.

06 POLICY CS3 HOUSING TARGET

06 POLICY CS3: HOUSING TARGET

- Policy CS3: Target – general justification for housing target
- Policy CS3: Target – population projections
- Policy CS3: Target – migration
- Policy CS3: Target – aspirational and affordable homes
- Policy CS3: Target – empty homes and vacant sites
- Policy CS3: Target – distribution
- Policy CS3: Target – rate of delivery
- Policy CS3: Target – benefits of new housing
- Policy CS3: Target – neighbouring boroughs

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS3: Target – general justification for housing target	<ul style="list-style-type: none"> • It is inherently difficult to predict the level of housing need 14 years ahead – it can be no more than speculative • The number of houses needed to be built in the next 5 years has been over estimated • North West doesn't have a housing shortage like London and the South East • The Planning for Housing Growth Technical Report should properly address the constraints of the models, methodology, assumptions and error margins in the report 	<p>The Plan has been prepared over an 18 year time frame (2010-2028). There is a need for new housing in Knowsley over the period of the Plan. The extent of the housing requirement is set out in the Technical Report: Planning for Housing Growth (Examination library reference TR01). The Inspector has on the basis of evidence submitted to date found the Council's approach to setting a housing target to be sound.</p> <p>The Plan incorporates a range of monitoring mechanisms to ensure that it remains the most appropriate strategy for the Borough. This means it can be subject to regular assessment during its implementation period.</p>

06 POLICY CS3 HOUSING TARGET

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS3: Target – population projections	<ul style="list-style-type: none"> • The baseline population assumption is incorrect and overstated • The Office of National Statistics (ONS) has produced new figures on population which should be taken into account in the housing requirement • Population projections from the ONS (Sub National Population Projections Update 2014) are far lower than is required to justify Green Belt release • The Council states that the population is going to increase, however Knowsley’s population has been decreasing for the last 50 years • Insufficient evidence that the population will increase enough to require the scale of development considered by the Plan • Lack of clarity about how the demand for additional housing has been evaluated and the demographic basis on which the calculations are based • Needs to be based on a realistic population projection and mortality of the aging population • A robust monitoring system is required to demonstrate the need for housing relative to population projections 	<p>The Council has utilised the most up-to-date national statistics regarding the existing population, and projected future population growth and household growth. These national statistics represent an important element of the Council’s consideration of the need and demand for new housing, and hence of an appropriate housing target. Further detail is set out in the Technical Report: Planning for Housing Growth (Examination library reference TR01).</p> <p>The Council has already accounted for the latest population projections from the ONS (the 2012-based sub-national population projections, published in 2014) (see Sub-National Population Projections Update, Examination library reference SD31). This matter was discussed at the July 2014 hearings; the Inspector has not raised any issues about the soundness of the Council’s approach to setting a housing target.</p> <p>The Government has stated that it intends to issue new household projections in February 2015. The Council intends to provide evidence assessing the implications of these to be taken into account during the remainder of the Examination in Public.</p> <p>The Plan incorporates a range of monitoring mechanisms to ensure that it remains the most appropriate strategy for the Borough. This means it can be subject to regular assessment during its implementation period.</p>
Policy CS3: Target - migration	<ul style="list-style-type: none"> • No guarantee people will come to the area due to little or no employment opportunities • It has been stated that houses are needed to 	<p>The Plan is seeking to meet both housing and employment needs in Knowsley. Council Hearing Statement 3A (Examination library reference CH03A) outlines the Council’s</p>

06 POLICY CS3 HOUSING TARGET

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>meet expected demand and that they are needed to encourage people to move to the area – this is a contradiction</p> <ul style="list-style-type: none"> • Illegal immigrants take properties (Council ones) and cause a shortage of houses 	<p>position on the relationship between its plans for housing growth and employment growth.</p> <p>The Plan seeks to deliver housing to meet needs arising in the Borough. An element of this will involve providing housing for residents who may have otherwise move elsewhere. Knowsley is within a wider strategic housing market with neighbouring Boroughs like Liverpool and Sefton, and there is strong evidence of migration and commuting between Knowsley and these areas. The Council’s approach has accounted for this. Further detail is set out in the Technical Report: Planning for Housing Growth (Examination library reference TR01).</p> <p>There is no evidence that illegal immigrants are causing a particular issue for housing demand in Knowsley.</p>
<p>Policy CS3: Target – aspirational and affordable homes</p>	<ul style="list-style-type: none"> • ‘Executive’ aspirations are unachievable in this area • Emphasis is frequently given to affordable / supported housing with no emphasis given for ‘aspirational’ properties for the upper end of the market to support business activity in Halewood • Appropriate housing needs to be built to encourage higher earners to stay within or relocate to Knowsley 	<p>The Plan includes clear objectives about the need to rebalance the housing market in Knowsley. This means ensuring the market delivers a range of choice, size and type of homes across the Borough. There is an identified shortage of larger market (or “executive”) homes in Knowsley. There is also likely to be a market for these homes in some parts of Knowsley, particularly due to the trends of high earnings of those who commute into Knowsley for work from different areas. This is reflected in various policies of the Plan, which require developers to demonstrate how their proposal will contribute to rebalancing the housing market. Further detail is set out within the Technical Report: Planning for Housing Growth (Examination library reference TR01).</p>
<p>Policy CS 3:</p>	<ul style="list-style-type: none"> • Numerous housing developments have been 	<p>In its assessment of housing land availability the Council has</p>

06 POLICY CS3 HOUSING TARGET

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Target – empty homes and vacant sites	<p>built and others are about to start – have these been taken into account in the housing target?</p> <ul style="list-style-type: none"> • The model for predicting the number of houses to be built is flawed as land in Prescot and Huyton that was previously earmarked for development is undeveloped • Existing (completed) housing developments unsold and unoccupied – these have not been adequately considered 	<p>accounted for all known housing developments which are on site, or which have planning permission but have not yet commenced development. The Council has also assessed the suitability of a range of other vacant sites within the urban area. Further detail is set out in the latest assessment of land availability published by the Council (Examination library reference AD38).</p> <p>The Council's Technical Report: Planning for Housing Growth (TR01) confirmed that in 2013 there were 2,311 vacant units in Knowsley. This figure represented nearly 3.7% of the Borough's housing stock, but is not excessive when compared to previous national averages. Empty homes are not usually counted towards the supply of land for new housing. This is particularly because the type of housing which is vacant often does not match (for example in terms of size, location, market sector or tenure) the needs which exist.</p>
Policy CS3: Target – distribution	<ul style="list-style-type: none"> • The scale of Green Belt release at Knowsley Village represents a disproportionate and unsound extension to the village. • Prescot and its surrounding area have already seen extensive house building programmes. • There has been no justification for the number of houses that are proposed for the development at Halewood • Further research should be done into whether so many homes are actually needed in Whiston now • Population growth in Halewood does not show the need for the amount of houses proposed by 	<p>The Council's previous evidence considered the need for housing growth in all of Knowsley's main settlements. This matter was considered at the November 2013 hearings. The Council's position on the distribution of housing growth is set out in Hearing Statement 3B (Examination library reference CH03B).</p>

06 POLICY CS3 HOUSING TARGET

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	the Local Plan	
Policy CS3: Target – rate of delivery	Whilst some development / additional housing may be needed in the future, this growth should be slow and supported by the local economy	<p>The Plan sets a target of 8,100 new homes to be delivered between 2010 and 2028, at an annual average of 450 dwellings per annum. The Inspector has found this target on the basis of evidence submitted to date to be sound. The Plan also seeks to deliver growth in employment land development over the period. It is recognised that these matters are interrelated; however there is no evidence that delivering the required levels of housing growth should be held back due to a lack of economic development. The Council's evidence suggests that both its housing and employment land targets are deliverable.</p> <p>The Plan incorporates a range of monitoring mechanisms to ensure that it remains the most appropriate strategy for the Borough. This means it can be subject to regular assessment during its implementation period.</p>
Policy CS3: Target – benefits of new housing	Notion that new housing will contribute towards economic development and population retention is fundamentally flawed	Housing growth is required to meet the housing needs arising from the existing population, which is projected to grow. Meeting this need will help to prevent de-population. There are clear economic benefits to housing growth, arising for example from the construction jobs necessary to deliver housing. Increased housing can also help to deliver economically sustainable communities, by providing a local workforce, and a population to sustain local services. The Council has set out its justification for its proposed level of housing growth within the Technical Report: Planning for Housing Growth (Examination library reference TR01).
Policy CS3: Target –	<ul style="list-style-type: none"> • Neighbouring boroughs may be able to take up some of the housing requirement and have not 	The matter of whether a neighbouring authority could meet any of Knowsley's housing requirement has been considered

06 POLICY CS3 HOUSING TARGET

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
neighbouring boroughs	<p>been consulted</p> <ul style="list-style-type: none"> • Liverpool Council is in the process of preparing a Local Plan – consideration should be given to whether Liverpool can cater for housing needs after 2028 	<p>at length throughout the Plan preparation process. Earlier evidence demonstrated that this did not form a practicable solution to meeting Knowsley’s housing needs. Further explanation is given within the Council’s Duty to Cooperate Statement (Examination library reference SD14 and SD30), which has itself been subject to consultation and agreement with neighbouring local authorities.</p>

07 POLICY CS3 HOUSING LAND SUPPLY

07 POLICY CS3 HOUSING LAND SUPPLY

- Policy CS3: Supply - Proposed modification - M055 - support
- Policy CS3: Supply - Proposed modification - M055 - recommended change
- Policy CS3: Supply - Proposed modification - M057
- Policy CS3: Supply - Proposed modification - M059
- Policy CS3: Supply - Housing trajectory
- Policy CS3: Supply - Land supply - alternative brownfield / previously developed sites in Knowsley to Green Belt release in Knowsley
- Policy CS3: Supply - Land supply - alternative brownfield / previously developed / Green Belt sites in neighbouring districts
- Policy CS3: Supply - Land supply - assessment inconsistent with new Green Belt guidance and national policy
- Policy CS3: Supply - Land supply - density assumptions used in calculations
- Policy CS3: Supply - Land supply - assumptions applied to viability and deliverability calculations
- Policy CS3: Supply - Land supply - contribution of windfall development
- Policy CS3: Supply - Land supply - contribution of conversions
- Policy CS3: Supply - Land supply - status of housing developments recently built and commenced
- Policy CS3: Supply - Land supply - affordable housing
- Policy CS3: Supply - Land supply - inadequate employment provision to support new housing
- Policy CS3: Supply - Housing delivery - impact upon development of brownfield / previously developed sites
- Policy CS3: Supply - Housing delivery - brownfield sites easier to develop / constraints relating to Green Belt sites
- Policy CS3: Supply - New evidence/guidance/best practice - previously not available to the hearings or consultations on the Local Plan

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS3: Supply - Proposed modification - M055 - support	Support acceptance of the Sedgefield method to calculate the five year housing requirement as part of Policy CS3 and its accompanying	Comment noted - no response required.

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	text (M056A, M056B, M065).	
Policy CS3: Supply - Proposed modification - M055 - recommendation	To reflect comments made regarding Policy CS5 clause 4 being unnecessary, there is no need to cross reference Policy CS5 within the text of Policy CS3.	This recommendation is not a matter of soundness or legal compliance, as the Council's approach to Green Belt and the allocation of Sustainable Urban Extensions is relevant to Policy CS3.
Policy CS3: Supply - Proposed modification - M057	<p>The plan is unsound because:</p> <ul style="list-style-type: none"> • No emphasis is given in the Plan for the development of 'aspirational' properties for the upper end of the market to support Industrial and Business activity in areas like Halewood. • Great majority of the senior figures who make their living in Knowsley depart at night for the leafier parts of Cheshire or West Lancashire, in part, at least, because there are very few, if any, developments which might satisfy the needs of those individuals or their families in Knowsley. 	The Plan acknowledges the shortages of larger, executive market homes in Knowsley, and the need to address out-migration. Balancing the housing market is a strategic objective of the Plan, and meeting housing needs is one of its core development principles. Policy CS3 ensures that developers demonstrate how they are contributing to this rebalancing, whilst Policy CS17 seeks justification of new residential development in terms of how the size of dwellings to be provided contributes to an appropriate mix of housing.
Policy CS3: Supply - Proposed modification - M059	Support this modification setting out the circumstances which would trigger a review of Policy CS3. However consider that this should be classified as a main modification given its importance to the soundness of the plan.	Not a matter of soundness or legal compliance. Nevertheless no objection is offered if the Inspector chooses to re-classify M059 as a main modification in his Inspectors report. This is noting that the full list of proposed modifications have been subject to consultation.
Policy CS3: Supply -	The plan is unsound because:	The five year requirement is for 3592 dwellings (i.e. 450

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Housing trajectory	<ul style="list-style-type: none"> • The figures used are understated and therefore the trajectory is incorrect - we estimated that the final five-year housing requirement was 3592, taking into account the backlog of 743 houses and the 20% Buffer required by the NPPF for Local Authorities with a consistent track record of poor completions. • Knowsley estimate that even if they remain on target during this first five-year period, which seems highly unlikely, they will construct approximately 2800 houses, a shortfall of 792 houses which means that the current backlog is, in effect, being carried forward by design into the second five-year phase of the Plan. • the council cannot say, that it is impossible to deal with the requirement to deal with any backlog within the first five years of the Plan period, as required by the NPPF "where possible" whilst refusing to consider the smaller Green Belt sites (i.e. Weston House) • Risks to the delivery of the Housing Trajectory Projections for the 15 year period have not been properly addressed. • The relatively brief period of time in which the original phasing mechanism for the release of Green Belt has been completely 	<p>x 5, plus 743, all plus 20% uplift). This is the land that the Council would, assuming the 20% uplift is applied to the shortfall as well as the annual target in this way, need to ensure is available within a five year period in order to provide a range and choice of development sites; this is different to the quantity of housing which the Council believes is deliverable, which is included within the housing trajectory.</p> <p>There is no justification for consideration of additional Green Belt sites, given that the overall capacity for residential development on such sites exceeds the Plan period requirement to provide flexibility in the Plan and a degree of 'headroom' in capacity should a particular site not come forward as anticipated. Alternative Green Belt sites including Weston House have been considered and rejected. The Inspector has indicated that the Council's approach to such alternatives is sound and that none of the proposed alternative sites warranted inclusion in the Plan (see Inspector's First Interim Findings, Examination library reference EX26).</p> <p>Risks to the delivery of housing have been extensively assessed through the application of the Inspector's Note on Assessment of Land Availability (Examination library reference EX23), which resulted in a reconsideration of the available land for housing (Examination library reference AD38). The Council's position on this matter has not changed as a result of the removal of the Green Belt phasing mechanism.</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>abandoned, and justifiably so, has meant that there has simply not been enough time to give proper consideration to the effect on both Knowsley and Landowners/Developers of moving from 'famine' in the first five years to 'feast' in the same period, in terms of Development potential. All sorts of issues may arise – Landowner Intentions, Availability of funds for Development, the Business environment, Political issues, Infrastructure implications, costs and the issue of Developer Contributions.</p> <ul style="list-style-type: none"> • The Housing Trajectory numbers in the first five years rely heavily on the SHLAA sites many of which have been available for years with Knowsley being unable to persuade Developers to take them on, and the new Sustainable Urban Extension sites, and in particular three very large sites. • Does not take into account the significant difficulties which may be encountered during the Plan period in bringing the development of the SUE sites, particularly the three very large sites, to fruition. • We are heading towards the end of the second year of the Plan period, and it does not take a great deal of imagination to envisage issues, problems, hold-ups, 	<p>The Plan contains sufficient monitoring and review mechanisms to allow for any failure in delivery of new housing to be addressed through review of the Plan.</p> <p>The justification for the phasing of the SUEs within the housing trajectory is outlined in the Sustainable Urban Extensions Technical Report (chapter 5). This document highlights the infrastructure provider and landowner engagement that underpins the assumptions in the housing trajectory. The principal assumptions for the phasing of the SUEs are outlined in Table 5.5 of the SUE Technical Report (Examination library reference TR07) which includes adequate provision for sites to progress through their pre-planning application, planning application and development phases.</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>disputes on the part of both sides which are likely to ensure that the projected housing numbers for the first five years will not be achieved.</p> <ul style="list-style-type: none"> • Clear admission in Proposed Modification M030 of Knowsley of their very poor historic record of Net Completions in the period 2002/3 to 2012/13 - an average of 189 per annum, and yet we are asked to believe that in the remaining three years of the first five-year part of the plan more than 1,000 houses per annum will be constructed. • Cannot understand the reluctance of Knowsley to include the smaller Additional Reserve sites (Weston House) which are available, in single ownership, and deliverable within a very short period of time - No explanation for the Inspector's Finding has ever been proffered by the Inspector to date, and therefore it has been impossible to present a cogent argument to Knowsley to gainsay the Inspector's decision. • Knowsley has not provided convincing evidence to support the view that the SUE sites are deliverable in total. • Recommended to revise the Housing Trajectory figures to show numbers which include the Housing Backlog and the 20% 	

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>Buffer, and review strategy to allow the inclusion of the smaller Green Belt Sites (including Weston House) so that this shortfall can be dealt with in accordance with NPPF requirements.</p>	
<p>Policy CS3: Supply - Land supply - alternative brownfield / previously developed sites in Knowsley to Green Belt release in Knowsley</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • There is an absence of need for Green Belt sites given availability and sufficient quantity of alternative brownfield sites, waste land, etc, not currently or adequately considered. • There is an absence of need for Green Belt sites given availability and sufficient quantity of vacant offices, light industrial uses, businesses and shops, not currently or adequately considered. Business parks stand empty with empty units and land (Kings Business Park, Huyton Business Park and Fallows Way, Whiston mentioned as specific examples). • Now easier to bring vacant and underused public land back into use through the Community Right to Reclaim Land (reference to Eric Pickles statement in October 2014). • Since January 2014 a new Right to Contest has enabled the public to 	<p>The Inspector's Second Interim Findings (Examination library reference EX34) suggest that the revision to the calculation of a five year housing land supply, the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The Council's calculation of the housing supply position from 1 April 2013 as set out in document AD38 includes a comprehensive appraisal of the deliverability of previously developed (i.e. brownfield) sites, updating the information within the Housing Position Statement (document SD22). This accords with the Inspector's methodology produced in document EX23 during the hearings.</p> <p>The Council's Technical Report: Planning for Housing Growth (TR01) confirmed that in 2013 there were 2,311 vacant units in Knowsley. This figure represented nearly 3.7% of the Borough's housing stock, but is not excessive when compared to previous national averages. Empty homes are not usually counted towards the supply of land for new housing. This is particularly because the type of housing which is vacant</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>challenge the government about land and property they feel could be put to better use, and ask for it to be sold.</p> <ul style="list-style-type: none"> • Green Belt release should only be considered after all available brownfield sites and vacant premises have been developed as recommended by the Government (references made to statement made by Eric Pickles MP when new guidance was published in October 2014). • 5,222 new properties can be built on brownfield sites and with over 2,000 empty homes this could practically meet our housing needs and would be an acceptable way forward. • Latest figures for empty homes in Knowsley of 2,020 (April 2012) and SHLAA (2012) identify enough land in Knowsley to build another 5,636. Why do we therefore need to release areas of Green Belt for a similar amount (i.e. 7,000 - 8,100) by 2028? • At least 7,656 potential dwellings are available before any Green Belt release should be considered. • Empty homes should be brought back into use first, before Green Belt sites are considered. • Knowsley has a poor record of bringing 	<p>often does not match (for example in terms of size, location, market sector or tenure) the needs which exist.</p> <p>The Community Right to Reclaim Land is noted as a valuable tool to ensure vacant and underused public land. However there appears to be limited prospect of significant additional surplus land being identified which would contribute to housing land supply. This is noting that the Council is already proceeding with a Strategic Housing Land Disposal Programme to dispose of surplus Council owned land assets, with the associated sites already included in Knowsley's housing land supply calculations. Details of Council Land Residential Sales and Transfers since 2003/04 and those anticipated during the plan period are included in document AD28b.</p> <p>The overall amount of land identified as being available for new housing during the Plan period amounts to 8,998 dwellings (including the SUEs), which is nearly 900 dwellings in excess of the Plan period target thereby providing suitable headroom for flexibility.</p> <p>Consultation has been undertaken with Registered Providers (housing trusts / associations) at every stage of Plan preparation. Evidence is set out in the Reports of Consultation from the "Issues and Options" and "Preferred Options" stages (Examination library references SD04, SD05 and SD05A) and the Statement of Previous Consultation, which summarises the</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>empty and derelict homes back into use.</p> <ul style="list-style-type: none"> • The Council has not utilised empty properties and brownfield sites in its calculations. • The Council has not considered other Council holdings such as redundant schools and conversion of employment land via the SHLAA as recommended by Government. • Consideration should also be made of the already extensive house building, business and retail developments that have already taken place and are ongoing in the urban area. • SHLAA Report of 2012 there is reference to the Borough having 12.6 years of capacity rather than 15 years. It must be a possibility that as the 12.6 years approach the situation regarding available brownfield land may have changed, and/or assess migration/population increase. In this context relating to housing there is no reference to any consultation with any local housing trusts. There is potential of alternative brownfield sites / previously developed land to reduce the amount of Green Belt land required. • Smaller developments on unused land are better for communities than building large developments. 	<p>consultation undertaken by the Council up to when it submitted the KLPCS to the Government in July 2013 (Examination library reference SD01).</p> <p>The sites specifically identified in responses as awaiting redevelopment which are not included in housing land supply calculations in document AD38 are as follows (with reason for non-inclusion):</p> <ul style="list-style-type: none"> • the Former Huyton Cricket Ground (allocated as Urban Greenspace); • Knowsley Community College site (not available for development or surplus to requirements as at 1 April 2013); • Land adjoining Ellis Ashton Street (allocated for employment); • Former Knowsley Training Centre (not available for development or surplus to requirements as at 1 April 2013); • Huyton fire station (not available for development or surplus to requirements as at 1 April 2013); • Whiston fire station (not available for development or surplus to requirements as at 1 April 2013); • Roby Community Centre (not available for development or surplus to requirements as at 1 April 2013); • Land at Sewell Street, Prescot (allocated as a development opportunity site with planning permission for mixed use retail development) • Former Esso garage, Prescot (in private ownership,

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Significant sites are awaiting redevelopment and should be prioritised before Green Belt - specific examples provided: <ul style="list-style-type: none"> a) Former Huyton Cricket Club, Huyton Lane b) Former Huyton Leisure Centre, Roby Road c) Former Prescot Leisure Centre, Scotchbarn Lane d) Vacant Community College site, Rupert Road e) Former Bowring Park High School, Western Avenue f) Land adjoining Ellis Ashton Street, Huyton Quarry g) Former BICC site with access off Cross Lane, Prescot h) Former Bridgefield Forum site, Halewood i) Former Knowsley Training Centre, Primrose Drive & Knowsley Lane, Huyton j) Huyton / Whiston fire stations. k) Delph Lane, Prescot l) Garage in Huyton with planning permission for flats m) Page Moss area. n) Roby Community Centre, Arnside Road 	<ul style="list-style-type: none"> not submitted as part of SHLAA call for sites) • Chapel Street / Warrington Road, Prescot (specific site referred to unknown). <p>The Council has reflected the requirement to evaluate the long term protection of land allocated for employment use (as required by NPPF Para. 22), including vacant land and premises in existing business parks. This evidence is presented in the Joint Employment Land and Premises Study which identified only sites within the South Prescot Action Area and land to the rear of Halewood International at Huyton Industrial Park as no longer suitable for employment development. For clarification it should be noted that there is not a significant headroom or surplus of employment land supply relative to requirements up to 2028 as demonstrated by Table 5.1A of the Local Plan: Core Strategy (Proposed modification M071).</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>/ Merton Crescent.</p> <p>o) Land at Sewell Street, Prescott</p> <p>p) Former Esso garage, Warrington Road, Prescott</p> <p>q) Chapel Street / Warrington Road, Prescott</p> <ul style="list-style-type: none"> • Given time more brownfield sites will become available reducing the need for the loss of Green Belt. • No reference to consultation with housing trusts. • Small areas of Green Belt land (example provided Edenhurst Avenue) that supply only a small contribution to the dpa shortfall should not be released until all other areas are exhausted. Small error margins in calculations have a far greater impact upon these sites. • Government policy could change within coming years to incentivise the development of brownfield land within the urban area. 	
<p>Policy CS3: Supply - Land supply - alternative brownfield / previously developed / Green Belt sites in neighbouring districts</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • The Council has not consulted with neighbouring districts, including well advanced building programmes in St. 	<p>The Council has consulted with all neighbouring local authorities at each stage of Plan preparation, including St.Helens, Halton and Liverpool. The Council has produced a Duty to Cooperate Statement which outlines the cooperation with the relevant bodies undertaken to date (Examination library reference SD14 and SD30).</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>Helens and Halton that may take up some of the housing requirement in Knowsley.</p> <ul style="list-style-type: none"> • Surplus land available within the administrative area of Liverpool which could meet the housing need (if it arises) in Knowsley after 2028. Examples offered include opportunities in Toxteth, L8 area and Norris Green, with positive regeneration benefits associated. • Liverpool City Council is in the process of preparing a Local Plan for its area and it is unclear what if any attempt has been made by Knowsley to engage in that process. • Liverpool City Council consider that the large amount of Green Belt release is too much, may be premature and no contact has been made with Liverpool under duty to co-operate. Reference made to Liverpool response to original inspections. • Unclear whether there are Green Belt sites in adjacent areas (Liverpool, Sefton or St. Helens) that are less sensitive than those selected in Knowsley (Knowsley Village emphasised as example). • Potential to co-ordinate addressing longer term needs with adjacent districts (e.g. St. Helens) with consideration of predicted population changes. 	<p>The matter of whether a neighbouring authority could meet any of Knowsley's housing requirement has been considered at length throughout the Plan preparation process. Earlier evidence demonstrated that this did not form a practicable solution to meeting Knowsley's housing needs. Further explanation is given within the Council's Duty to Cooperate Statement (Examination library reference SD14 and SD30) which has itself been subject to consultation and agreement with neighbouring local authorities.</p> <p>Liverpool City Council has no outstanding objections in place in relation to the Plan. This is evidenced within the Council's Duty to Cooperate Statement (Examination library reference SD14 and SD30).</p> <p>The Council intends to continue its ongoing engagement with Liverpool City Council on the preparation of the Liverpool Local Plan.</p> <p>There is potential to address longer term needs jointly with neighbouring authorities. To this end, the Council intends to commission a joint needs assessment with neighbouring authorities, which will demonstrate continued joint working and cooperation, and inform monitoring and potential future review of the Knowsley Local Plan (see Council Hearing Statement 3A – Examination library ref CH03A).</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>Longer term development needs (i.e. those beyond 2028) will be considered as part of a review of the Plan currently being examined or an entirely new document. At that stage a suite of evidence is likely to be required to identify likely development requirements. Such evidence will include engagement with neighbouring authorities.</p> <p>In preparing Knowsley's current Plan and associated Green Belt Study, the Council has engaged extensively with neighbouring authorities. The Council has also worked closely with neighbouring Council's (specifically West Lancashire, Sefton, Halton and St Helens) as they prepared their respective Green Belt reviews. This is evidenced within the Council's Duty to Cooperate Statement (Examination library reference SD14 and SD30) which has itself been subject to consultation and agreement with neighbouring local authorities.</p>
<p>Policy CS3: Supply - Land supply - assessment inconsistent with new Green Belt guidance and national policy</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • New guidance on Green Belt protection (October 2014) in supporting the National Planning Policy Framework. This guides that when assessing the availability and suitability of land, the Council should take account of any constraints such as Green Belt which indicate development should be 	<p>The Inspector's Matters, Issues and Questions (Examination library ref: EX06, Qu. 5.10) prompted written evidence and discussion during the hearings in November 2013 of whether the capacity of broad locations proposed for Green Belt release (now SUE allocations) exceeds the potential shortfall.</p> <p>The Inspector's Second Interim Findings (EX34) suggest that the revision to the calculation of a five year housing land supply, the identification of Sustainable</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>restricted and restrains the ability of an authority to meet its targets.</p> <ul style="list-style-type: none"> • The guidance suggests that unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt. • Exceptional circumstances do not exist to justify removing land from the Green Belt. • There is no evidence of very special circumstances to override the harm to the Green Belt. The absence of a five year housing land supply in Knowsley does not constitute very special circumstances. • How can the Council justify doubling the supply of housing (via Green Belt release) through an additional 3,221 dwellings when the shortfall is only 1,812 dwellings? • Difference between these figures doesn’t justify release of small sites in Green Belt (Edenhurst Avenue referenced as example). 	<p>Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The existence of exceptional circumstances required to alter Green Belt boundaries exist (in accordance with NPPF paragraph 83) is informed by evidence such as the Council’s Green Belt Study (EB08) and Green Belt Technical Report (TR02). The need for earlier release of sites from the Green Belt to allow dwellings to be delivered in the period up to 31 March 2018 is evidenced by the Sustainable Urban Extension Technical Report (TR07).</p> <p>As part of this process, the Council considered four strategic options within the Technical Report: Sustainability Appraisal (TR07) to identify the most sustainable approach, including a Sustainability Appraisal of each (SD32b).</p> <p>The strategic option progressed within the proposed modifications to the Plan is that all the ‘reserved’ locations would be removed from the Green Belt and allocated for development in the Plan, thereby allowing their development in the short term. This is necessary to maximise the contribution of the sites to identifying and maintaining a five year deliverable supply of housing land in the short to medium term as risks associated with sites ‘stalling’ and reducing short term land supply are minimised due to there being a broader mix of sites.</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>Furthermore, table 6.2 (see TR07) confirms that of the four strategic options appraised only the allocation of all SUEs would meet the Council's deliverable housing land supply requirements.</p> <p>The overall amount of land identified for new housing during the Plan period amounts to a supply of 8,998 dwellings, which is nearly 900 dwellings in excess of the Plan period target thereby providing suitable headroom for flexibility in the Plan should one of more sites fail to come forward as anticipated. This is in line with national guidance within the NPPF (paragraph 14).</p>
<p>Policy CS3: Supply - Land supply - density assumptions used in calculations</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Densities used in the SHLAA are conservative. This is highlighted in Section 3.51 (pg.40) of the Housing Position Statement. This is also clearly shown in Table 3.13 (pg.40) of this document, where a higher figure of densities is given for sites with extant planning permission. This table shows the SHLAA 0-5 year supply with an average density of 33.2 dwellings per hectare (31.2 dph for 6 - 10 years). Extant planning permissions have an average density of 37.5 dph. This difference could multiply into a large number of dwellings. 	<p>The Inspector's Second Interim Findings (Examination library reference: EX34) suggest that the revisions to the calculation of a five year housing land supply are sound. Such calculations include assumptions relating to density.</p> <p>The above conclusion has been informed by responses to the Inspector's Matters, Issues and Questions (EX06) which included whether density assumptions in the SHLAA were unduly cautious and whether there are locations where higher densities would be acceptable. The Council's written response is included in document CH03C and justifies the reason for the density assumptions applied to different sites within the SHLAA, including the regular review of all site appraisals, current planning permissions, new evidence and engagement with the Housing Market Partnership. The Council</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • The Council has not considered more intensive use of land already identified via the SHLAA as recommended by Government. • Higher density development (high rise) should be built on brownfield land. • A lot of previously developed sites have been assumed to have lower capacity than their actual potential resulting in more pressure on the Green Belt. Following examples mentioned: <ul style="list-style-type: none"> a) Larch Road (K0440) - shown in SHLAA as potential capacity of 87 dwellings with an additional 20% discount in the Inspectors Interim Preliminary Assessment of Land Availability (IPALA) and the Council's Initial Housing Land Supply (IHLS). The discounted yield is 81% lower than the planning permission granted by Knowsley Council for 127 dwellings in September 2014. b) Pinnington Place, Huyton - has planning approval for 20 flats (planning ref: 13/00497/FUL) with the site listed with a capacity of 6 within the IHLS, to which a 20% discount has been applied. c) St. Georges Church Hall, St. Georges 	<p>applies different site densities where evidence exists (such as sites with planning permissions or where indicative site layouts have been provided as part of a funding bid to the Government (HCA) to deliver affordable units). This issue was discussed in detail during the hearings in November 2013.</p> <p>The Council's Technical Report: Sustainable Urban Extensions (TR07) provides details of housing delivery including density of developments of over 50 dwellings with completions during 2012/13 - 2013/14 in Table 5.3 (pg. 29). This demonstrates a range of between 8 and 82 dwellings per hectare (dph), illustrating the potential variance of density which the Council's assumptions can accommodate. It is inevitable that planning permissions will on occasion comprise both higher and lower densities than assumptions made within the SHLAA. However the average assumed densities of SHLAA sites of 33.2 dph and 31.2 dph for the 0-5 year and 6-10 year supply respectively are well within the correct range when compared with those with existing planning permission which had an average density of 37.5 dph at 1 April 2013. It is therefore not considered that the SHLAA assumptions under-estimate numbers of potentially deliverable dwellings, or that they significantly influence the overall need for removal of additional land from the Green Belt or immediate allocation of Sustainable Urban Extensions.</p> <p>Site densities within Sustainable Urban Extensions for</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>Road, Huyton - planning permission given for 14 dwellings (planning ref: 14/00035/FUL), site is listed within the IHLS with a capacity of 7, to which a 66% discount has been applied and pushed back to the 6 - 10 year supply.</p> <p>d) Hilton Grace Community Centre, The Avenue, Halewood - shown with a potential yield of 16 dwellings in the SHLAA 2012, this was updated to 21 units in the IHLS, however a 20% discount was applied. In December 2013, planning permission was granted for 21 dwellings (planning ref: 13/00497/FUL)</p> <ul style="list-style-type: none"> • Inconsistency of the 2012 SHLAA stating <i>“there are no wholly apartment / high density schemes within the identified SHLAA supply”</i> – planning permission was recently approved for 2no. apartment blocks on land at Thingwall Hall (14/00085/FUL). The site is just less than half a hectare in size giving a density of 48 dph. • Thingwall Hall apartments are part of a site for 525 dwellings, substituting seven detached properties – new plans increase the density and are likely to result in more than 525 dwellings (presently under 	<p>residential development at 30 dph are applied (except Land bounded by A58, Prescott and Land at Knowsley Village (Safeguarded Land) which are 25 dph) following necessary deductions from the gross site area to reflect the net development area. Gross developable areas and the calculation of net developable areas are identified in the Green Belt Technical Report (TR03) Appendix 7. Subsequent changes resulted in reduced capacity to the South of Whiston SUE (- 29 dwellings) in response to developer engagement and the Knowsley Lane SUE (- 158 dwellings) to reflect the policy approach pursued relating to the proportion of housing / employment to be allocated, developer engagement and discussion at the July 2014 hearings.</p> <p>The extant planning approval for the Bank Lane, Kirkby SUE is an ‘outline’ rather ‘full’ permission for up to 207 dwellings. Therefore the precise number of units will be considered in greater detail at a subsequent planning application stage when matters such as access, layout and design must be fully addressed.</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>construction) being built.</p> <ul style="list-style-type: none"> • Pinnington Place (13/00497/FUL) is another example of high density development. • Lower density development proposed on Green Belt sites (Knowsley Village and South Whiston identified as an example) is less sustainable than development of available brownfield sites. • Inconsistency of site densities of Green Belt locations with conclusions associated to SHLAA densities in the sustainability appraisal also noted. • Example of recent outline planning permission at Bank Lane (207 dwellings) which is a 76 dwelling increase (58%) on the Council's stated capacity for the site (13/00393/FUL). 	
<p>Policy CS3: Supply - Land supply - assumptions applied to viability and deliverability calculations</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Knowsley have adopted a cautious approach to identified sites and the actual potential figure is much higher (mentioned in context of 5,636 dwelling supply figure from SHLAA) due to discounting method. • Disagree with deductions through discounting and density assumptions 	<p>The Inspector's Second Interim Findings (Examination library ref: EX34) suggest that the revision to the calculation of a five year housing land supply, together with the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The Council's calculation of its housing supply position from 1 April 2013 as set out in Examination document AD38 includes a comprehensive appraisal of the</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>applied by Knowsley adding up a large number of dwellings deducted from the housing land supply.</p> <ul style="list-style-type: none"> • Disagree with Inspector’s approach of discounting brownfield sites put forward by Knowsley Council due to not being available immediately. • Discounting applied is too severe and should be re-considered now there is an upturn in the housing market and much more activity. • DEFRA release Category 4 Screening Levels (C4SLs). Those reforms, says the report, “will avoid costly unnecessary remediation operations and focus attention on high risk sites, potentially saving business an estimated £132m a year”. Therefore, brownfield sites that were previously discounted by the Inspector due to slow release should be released more swiftly. • Knowsley Council should explore more ways to hasten brownfield development rather than sacrificing Green Belt. • There are modern exemplars of successful development on brownfield land, where developers were undaunted by the cost of ground remediation and landscape improvement - specific example provided: 	<p>deliverability of sites, updating the information within the Housing Position Statement (SD22). This accords with the Inspector’s methodology produced in document EX23 during the hearings.</p> <p>The Council’s calculations in Examination document AD38 include realistic assumptions about the availability, suitability and economic viability of land to meet the identified need for housing over the plan period in accordance with the requirements of NPPF paragraph 159, as informed by the Council’s evidence base.</p> <p>Due to the methodology of discounting (or ‘risk assessing’) sites, it is inevitable that there will be examples of subsequent planning permissions comprising higher dwelling capacities than discounted site assumptions in housing land supply calculations. This is because the purpose of deductions is not to predict the precise figure which will be developed at individual sites, rather reflect the extent to which the overall housing land supply identified is likely to be delivered in addressing needs during the plan period. There are greater degrees of risk to deliverability of individual sites dependent upon their status and site-specific context that inform the variation in discounts applied via the methodology.</p> <p>The Council has no specific evidence which would lead to a conclusion that the discounting assumptions applied are no longer robust.</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>a) Cables Retail Park - mixed development.</p>	<p>The Council is seeking to prioritise the delivery of development on previously developed land by identifying Principal Regeneration Areas in the Plan. There is also a Strategic Housing Land Disposal Programme to dispose of surplus Council owned land assets, with the associated sites already included in Knowsley's housing land supply calculations. Evidence of Council Land Residential Sales and Transfers since 2003/04 and those anticipated during the plan period are also included in Examination document AD28b. However these approaches do not alter the fact that there is a current shortfall of deliverable housing to provide a five year housing land supply and meet the Borough's needs up to 2028, which necessitates release of Green Belt and immediate allocation of Sustainable Urban Extensions.</p>
<p>Policy CS3: Supply - Land supply - contribution of windfall development</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • The Council has not considered the contribution of windfall development via the SHLAA as recommended by Government. • The following site is an example of a windfall addition to housing land supply since the SHLAA was published in 2011 through planning permission being granted: <p>a) Land at Larch Road, Huyton (K0440) –</p>	<p>NPPF paragraph 48 is clear that for an authority to make allowances for windfall development compelling evidence is required that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Such compelling evidence does not currently exist.</p> <p>The Inspector's Matter, Issues and Questions (Examination library ref: EX06) included a question on windfall development (Qu.3.10) with further discussion of the issue during the November 2013 hearings. The Council's written response in document CH03C referred to the SHLAA 2012 Update (EB01) which provided the</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>planning permission for 127 dwellings granted in September 2014, included in SHLAA update (87 dwellings)</p> <ul style="list-style-type: none"> • The following sites are identified as examples of windfall additions to housing land supply since the Council's Initial Housing Land Supply (IHLS) through planning permission being granted: <ul style="list-style-type: none"> a) Prescott Citizens Advice Bureau (13/00560/FUL) - 5 apartments b) Blundell Road, Prescott (14/00488/OUT) - 3 dwellings • Also some submitted planning applications (not yet decided) for sites not identified within the IHLS. 	<p>first reliable opportunity to assess windfall delivery and concluded that an average of 12 dwellings per annum (dpa) had been delivered on windfall sites between 1 April 2008 and 30 September 2011. Whilst this figure was considered robust it has not been included in the Council's supply calculations. This is primarily due to the short time frame over which this evidence is available and the prevailing housing market conditions which have adversely affected the delivery of new housing. The Council proposes to assess future windfall trends in the annual updates to the SHLAA.</p>
<p>Policy CS3: Supply - Land supply - contribution of conversions</p>	<ul style="list-style-type: none"> • Between 2003/2004 and 2011/12 there were 191 conversion gains or 21 per year (Housing Position Statement). Although there are some losses to conversions, there is a net gain of conversions. • The conversion gains show the potential from this source - the potential will now be higher given the easing of Government restrictions on the conversion of former office space to dwellings. 	<p>Between 2003/04 and 2011/12 there were 191 gains from conversions, but 123 losses, leaving a net gain of 68 dwellings. Over ten years, this is less than 7 dwellings a year - a small addition to overall completions. It is difficult to quantify the likely on-going contribution from this source to housing supply. As numbers have historically been low, it is not considered appropriate to rely on completions from this source (see Technical Report: Planning for Housing Growth, Examination library reference TR01).</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
<p>Policy CS3: Supply - Land supply - status of housing developments recently built and commenced</p>	<p>The plan may be unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Numerous housing developments have recently been built and others are ready to start. Have these been deducted from the proposed totals? 	<p>The Inspector has agreed a base date of 1 April 2013 for land supply calculations within the Local Plan: Core Strategy. The Council's Monitoring Report 2014 (PP30) provides an update on the annual monitoring of net housing completions and housing land supply. As the Local Plan: Core Strategy Examination in Public remains ongoing and the supply figures provided remain at a base date of 1 April 2013 in the interest of consistency with previous discussions. It is intended that an update to housing land supply information will be provided at regular updates in the future.</p> <p>In the interest of clarity the number of net additional dwellings completed in 2013/14 in Knowsley was 360 (comprising 358 gross new build dwellings, four demolitions, 17 dwellings gains through conversion or change of use, and 11 dwellings lost through conversion or change of use). The total net additions is 90 dwellings below the annual target of 450 dwellings.</p>
<p>Policy CS3: Supply - Land supply - affordable housing</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Plans should include provision for affordable housing. • There is concern that people will be unable to obtain the necessary mortgages for the new dwellings. 	<p>The Local Plan includes provision for affordable housing to be sought as part of new market housing development, within Policy CS15. The Council is seeking to ensure that a range of housing needs are met, including those who require affordable housing solutions such as social rented or intermediate homes.</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
<p>Policy CS3: Supply - Land supply – inadequate employment provision to support new housing</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Future employment opportunities are overstated, aspirational, not guaranteed and cannot support new housing proposed. • Executive aspirations are unachievable in the area (referring to South Whiston specifically) – people will come to the area with little or no employment opportunities. 	<p>The Inspector’s Second Interim Findings (Examination library ref: EX34) suggest that the revision to the calculation of a five year housing land supply, together with the identification of Sustainable Urban Extensions (SUEs), the removal of the phasing mechanism for the release of these sites for development and the policy approach to employment supply and delivery, are sound.</p> <p>The Inspector’s Matter, Issues and Questions (EX06) included a question (Qu. 3.4) querying the extent to which employment factors have been taken into account in determining the scale of housing need, and whether the scale of new housing is in balance with the anticipated growth in jobs. The Council response in document CH03A established that the scale of job growth planned for in the KLPCS broadly accords with the population growth which is estimated to result from the Plan’s housing policies. This matter was discussed in further detail at the November 2013 hearings, and consequently the Inspector Interim Findings (EX26) suggested that evidence from a wide range of sources indicated 183.5 hectares of employment land over the Plan period is towards the upper end of the range of probable needs. The resultant recommendation was a modification to 160 hectares up to 2028.</p> <p>In terms of the South of Whiston SUE, the proposed new housing is complemented by new employment opportunities associated to the neighbouring Land South</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>of M62 SUE. The South of Whiston SUE is also in close proximity to existing employment areas (Whiston Enterprise Park and Huyton Business Park) and has access to wider opportunities via sustainable modes of travel and the adjacent strategic highway network (M62 / M57 / A5300).</p>
<p>Policy CS3: Supply - Housing delivery - impact upon development of brownfield / previously developed sites</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Early release of Green Belt will delay the development of brown field sites, as stated by the Council in previous hearings. • Early release of Green Belt sites will impact upon the Council's regeneration objectives - developers will not consider run down existing areas whilst vast areas of Green Belt are available and are considerably easier to develop. 	<p>The Inspector's Second Interim Findings (Examination library ref: EX34) suggest that the revision to the calculation of a five year housing land supply, together with the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The Council written response (CH05A) to the Inspector's Matter, Issues and Questions (EX06) included justification for the original clause 3(b) in policy CS5 relating to urban regeneration and phasing. However following consideration of evidence and discussion at the November 2013 hearings, the Inspector's Interim Findings (EX26), whilst acknowledging concern about such an impact, noted that it should be supported by compelling evidence that the early release of a particular reserve location would significantly undermine delivery of a Principal Regeneration Area.</p> <p>The Council's Sustainability Appraisal (SD28) of the preferred option for the proposed modification (i.e. allocation of all SUEs) as referred to in the Technical Report: Sustainable Urban Extensions (TR07, pg.52)</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>acknowledges concern that the approach may lead to competition with, and risk the delivery of, housing-led regeneration across the borough. However this risk is outweighed by the benefits to the scope for housing (and employment) delivery to address plan period requirements and identification of a five year housing land supply to address immediate needs. Furthermore, the Council is aware of no evidence that would categorically prove a negative impact on any of the proposed PRAs as a result of allocating the SUEs. This does not confirm that there would not be any adverse impact, but highlights that such an impact cannot be proven at this stage. The Council covered this matter in its statements to the reconvened hearings in July 2014 (document CH13A).</p>
<p>Policy CS3: Supply - Housing delivery - brownfield sites easier to develop / constraints relating to Green Belt sites</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Brownfield sites are often easier to develop due to existing utilities and road access. Specific example identified: <ul style="list-style-type: none"> a) Former BICC site, Prescott • There is inadequate infrastructure associated to Green Belt sites proposed for release and numerous constraints to development, examples identified: 	<p>NPPF paragraph 111 promotes the effective use of land by re-using land that has been previously developed (brownfield land). The Council's calculation of housing supply position from 1 April 2013 as set out in Examination document AD38 includes a comprehensive appraisal of the deliverability of previously developed (i.e. brownfield) sites, updating the information within the Housing Position Statement (SD22). This accords with the Inspector's methodology produced in document EX23 during the hearings.</p> <p>The Inspector's Second Interim Findings (EX34) suggest that the revision to the calculation of a five year housing land supply, together with the identification of</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> a) Absence of community facilities. b) Adjacent heritage assets. c) Air quality d) Existing local deprivation. e) Flood risk. f) Geology, soils and mining legacy. g) Impact upon existing highway infrastructure, traffic generation, highway safety and road access. h) Impact upon health and wellbeing, and social welfare. i) Impact upon natural environment, ecology, biodiversity, species, habitats, wildlife, flora and fauna (examples mentioned include invertebrates, bee and butterfly populations, buzzards, kestrels, skylark, yellow hammer, grey partridge, bats, moles, shrews, hedgehogs, foxes, rabbits, rats, mice, voles, swans, Canada geese, coots, moorhens, herons, lap wing and brown hare and linking to the North Merseyside Biodiversity Action Plan). j) Impact upon rural businesses (examples mentioned were riding centre and farming) k) Inadequate public transport. l) Light pollution m) Loss of agricultural land (Grade 2 BMV mentioned). 	<p>Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The Council's statements to the reconvened hearings in July 2014 (CH13A) confirm the extent of re-engagement with a range of public sector partners and infrastructure partners. This was necessary to inform the proposed modifications relating to the allocation of SUEs and the preparation of the associated policies in the KLPCS. Reasonable and necessary infrastructure to ensure delivery of an acceptable development can be secured through the requirements of Policy SUE2 - SUE2c (and the wider KLPCS policies as appropriate) and development is feasible in terms of utilities provision.</p> <p>The constraints to development identified (except loss of agricultural land), are all capable of being resolved and / or appropriately mitigated, through the design, layout, and / or master planning of development (where appropriate), including the examples of detailed material considerations that are appropriately addressed at planning application stage.</p> <p>The net developable areas (which inform the notional capacity of SUEs identified in the KLPCS Appendix E: Allocation Profiles) account for site constraints arising from historic environment, public open space/outdoor sports provision, flood risk, natural environment/ecology/biodiversity, etc. The Council has</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>n) Loss of green space, playing fields, trees, woodlands (including reference to ancient woodland and Old Wood), wetlands / water bodies (examples mentioned - Big Water, Little Lake, Prescott Brook) and recreational space.</p> <p>o) Limited range of services, including retail provision.</p> <p>p) Noise impact.</p> <p>q) Pressure on hospitals, GP practices, dental facilities and other medical and services.</p> <p>r) Pressure on policing / increase in crime.</p> <p>s) Pressure on school and nursery provision.</p> <p>t) Proximity to motorways (linked to air quality, noise and traffic impacts).</p> <p>u) Public rights of way.</p> <p>v) Utilities and drainage.</p> <ul style="list-style-type: none"> • Inadequate information / very little detail provided on the potential design of development proposed in the Green Belt, i.e. type and layout of housing, amenities, access points and infrastructure to be provided. • Confusion during consultation meetings on precise numbers of housing in certain Green Belt locations - are 1,500 dwellings 	<p>prepared a detailed evidence base relating to each of these thematic areas which informed the calculations, together with the individual policies in the wider KLPCS which will necessarily apply to the development of the SUEs.</p> <p>The Council has previously provided a written response (CH05A) to the Inspector's Matter, Issues and Questions (EX06, Qu. 5.5) relating to the loss of agricultural land, with further discussion at the hearings in November 2013.</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	likely to be built in South Whiston or is this guidance misleading the community as developers will decide?	
Policy CS3: Supply - New evidence/guidance/best practice - previously not available to the hearings or consultations on the Local Plan	<p>Request for a review of the Local Plan because of new evidence/guidance/best practice that was previously not available to the hearings or consultations of the Local Plan:</p> <ul style="list-style-type: none"> • DEFRA - March 2014 DEFRA release Category 4 Screening Levels (C4SLs) • DCLG - New rules further strengthen green belt protections 16/10/14. • Eric Pickles - Councils must protect our precious green belt land 06/10/14. • Eric Pickles – now easier to bring vacant and underused public land back into use through the Community Right to Reclaim Land 24/10/14. • Brandon Lewis - Development on the Green Belt 11/08/14. • DCLG – Consultation on proposed changes to planning policy and guidance, ensuring fairness in the planning system, and strengthening protection of the green belt and countryside 14/09/14. • DCLG - Brownfield sites to be prioritised for development 28/10/14. • DCLG - Since January 2014 a new Right 	<p>The DEFRA publication about methods for screening potential contamination of land is not considered to make any material difference to the Plan policies.</p> <p>The DCLG changes to Planning Practice Guidance on Green Belt, as covered in Secretary of State announcements and the Planning Ministerial Statement about the protection of the Green Belt and prioritisation of brownfield sites are noted. The Council proposed to prioritise brownfield land as part of the KLPCS (submission version) which included a phasing ‘mechanism’ that would restrict the release of Green Belt until it was needed to maintain a supply of deliverable sites. This approach is evidenced by Council’s written statement (CH05A). The Inspector’s Interim Findings identified that the Plan was unsound with regard to land supply. Therefore proposed modifications including the early release of Green Belt sites have been developed to address these soundness issues. The Sustainable Urban Extensions Technical Report demonstrates that this approach is the only option that allows the Council to demonstrate a deliverable housing land supply.</p> <p>The Inspector’s Second Interim Findings (EX34)</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>to Contest has enabled the public to challenge the government about land and property they feel could be put to better use, and ask for it to be sold 08/01/14.</p> <ul style="list-style-type: none"> • Government initiatives to help build more new homes on brownfield land 13/06/14, £5 million fund will unlock 100 brownfield sites for new homes 07/08/14 • Bidding opens for £200 million to build homes on brownfield land 13/08/14 • The government has announced plans to create 30 housing zones on brownfield sites across the country to increase housing supply 22/10/14 • Land held by Homes and Communities Agency (HCA) and other major land holding departments has been sold with capacity for over 76,000 homes 31/03/14 • CPRE – Green belt development is “not the path to economic growth” 27/08/12 • Nick Boles MP - inspectors in Local Plan examinations should continue to determine whether local planning authorities have followed NPPF in seeking to meet the objectively assessed development needs of their area 18/03/14 • Reference to Reigate and Banstead and Mole Valley inspections. • Nick Boles MP – shortfall in housing does not constitute “exceptional circumstances” 	<p>suggest that the approach to the housing and employment land supply and delivery, together with the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The Secretary of State announcements about Community Right to Reclaim land are noted, but are not considered to make any material difference to the Plan policies.</p> <p>The DCLG consultation on proposed changes to planning policy and guidance from September 2014 relates to Gypsy and Travellers only, and does not make any material difference to Policy CS18 which relates to Travellers.</p> <p>The DCLG announcement on Right to Contest is noted, but this is not considered to make any material difference to the Plan policies.</p> <p>Whilst the Government initiatives for house building on brownfield land may facilitate delivery of homes, they are unlikely to make any material difference to the Plan policies.</p> <p>The CPRE announcements on Green Belt development are noted, but do not raise any issues which have not already been addressed through the Plan preparation process.</p>

07 POLICY CS3 HOUSING LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>18/03/14)</p> <ul style="list-style-type: none"> • The Guardian (Simon Jenkins) – “Housing crisis? No, just a very British sickness” states that building on green belt “wastes energy and infrastructure, it promotes commuting and destroys a dwindling environment. Housing “need” is in cities, where labour mobility and immigration are high and most poor people find work”. • Danny Dorling (Professor/author) concludes, “We cannot build our way out of the disaster of our current housing system.” We should rather tackle “how to better share and look after what we have already got” 21/05/14. • Letter from the Leader of the Council, Councillor R.J.Round, about financial strains on the Borough due to the Local Plan, October 2014. 	<p>The Ministerial statement on Local Plans, the NPPF and objectively assessed needs is noted. These matters have already been addressed through the Plan preparation process.</p> <p>The outcomes of other Examinations of Local Plans and articles regarding the need for housing are noted but cover many of the matters already addressed in the Plan. The need for housing in Knowsley has already been resolved through the Plan preparation process. Articles about the financial pressures of the Council are noted, but are not considered to make any material difference to the Plan policies.</p>

08 POLICY CS4 EMPLOYMENT TARGET

08 POLICY CS4 EMPLOYMENT TARGET

- Policy CS4: Target – Employment Land Target Justification
- Policy CS4: Target – Existing Economy / Employment
- Policy CS4: Target – Jobs
- Policy CS4: Target – Requirement for Business Park Uses
- Policy CS4: Target – Link between Housing and Employment

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS4: Target – Employment Land Target Justification	<p>The proposed employment land target is too high because:</p> <ul style="list-style-type: none"> • Employment targets are aspirational and future employment opportunities are overstated • Promises of new jobs are not supported by evidence • There is a lack of justification for the employment target due to the lack of guarantee that economic development will benefit local people, companies, etc. 	<p>The Inspector’s Second Interim Findings (Examination library ref: EX34) suggest that the approach to employment land supply and delivery, the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The evidence base which informed the Council approach to employment requirements and deliverability includes the Joint Employment Land and Premises Study (EB07), Liverpool City Region Housing and Economic Development Evidence Base Overview Study (LC03), Employment Position Statement (SD23) and Technical Report: Planning for Employment Growth (TR02).</p> <p>The Council provided a written response (CH04A) to the Inspector’s Matter, Issues and Questions (EX06). This matter was discussed in further detail at the November 2013 hearings, and consequently the Inspector Interim Findings</p>

08 POLICY CS4 EMPLOYMENT TARGET

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>(EX26) suggested that evidence from a wide range of sources indicated 183.5 hectares of employment land over the Plan period is towards the upper end of the range of probable needs. The resultant recommendation was a modification to 160 hectares up to 2028.</p> <p>Policy CS4 focuses new employment investment into existing and new locations in Knowsley enabling support for the growth of businesses and job opportunities. Interventions and new infrastructure to improve the accessibility of employment areas to Knowsley residents are sought through this and wider policies in the KLPCS. The policy also supports wider initiatives encouraged through the Council's Economic Regeneration Strategy (PG32) to provide training and support attainment levels of residents.</p>
Policy CS4: Target – Existing Economy / Employment	Question where the jobs are, as there are not any jobs in the area (South Whiston) at the moment.	The South of Whiston SUE location (and its neighbouring area) is complemented by proposed new employment opportunities associated to the neighbouring Land South of M62 SUE. The South of Whiston SUE (and its neighbouring area) is also close to existing employment areas (Whiston Enterprise Park and Huyton Business Park) and has access to wider opportunities via sustainable modes of travel and the adjacent strategic highway network (M62 / M57 / A5300).
Policy CS4: Target - Jobs	<p>The impact of the proposed employment land target on job creation was questioned, including:</p> <ul style="list-style-type: none"> • There is no guarantee that new and existing residents would fill the posts created by 	The Inspector's Second Interim Findings (Examination library ref: EX34) suggest that the approach to employment land supply and delivery, together with the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for

08 POLICY CS4 EMPLOYMENT TARGET

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>employment development on brownfield sites</p> <ul style="list-style-type: none"> • There is no evidence that development will bring employment to the area • There is nothing to say local firms will be used in construction • There must be more employment opportunities to ensure that Knowsley does not become even more deprived, but releasing Green belt will not aid this • Potentially bringing new jobs and investment and sustaining local employment in the area is not a sound reason for economic development 	<p>development, are sound.</p> <p>Policy CS4 clause 1(f) of KLPCS encourages recruitment targeted towards communities living in and around the development site. This ensures that any voluntary agreement(s) that the developer enters into with regard to local employment can be attributed positive weight when determining planning applications. The policy also supports wider initiatives encouraged through the Council's Economic Regeneration Strategy (PG32) to provide training and support attainment levels of residents.</p> <p>It is not however considered appropriate to impose specific restriction or targets associated to local labour / employment. Such an approach would conflict with NPPF paragraphs 14 and 19, and undermine Knowsley's economic links to the wider Liverpool City Region.</p>
<p>Policy CS4: Target – Requirement for Business Park Uses</p>	<p>The need for a successor to King's Business Park was questioned, due to:</p> <ul style="list-style-type: none"> • Existing vacancy at King's Business Park and opportunities for expansion • Vacancy at Huyton Business Park and Whiston Business Park (Fallows Way) • There is no need for more office space, only a want from the Council to encourage residents / business to locate in the Council area. 	<p>The Inspector's Second Interim Findings (Examination library ref: EX34) suggest that the approach to employment land supply and delivery, together with the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The Council identified qualitative needs for a successor site to Kings Business Park through evidence within the Joint Employment Land and Premises Study (EB07), Liverpool City Region Housing and Economic Development Evidence Base Overview Study (LC03) and Technical Report: Planning for</p>

08 POLICY CS4 EMPLOYMENT TARGET

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>Employment Growth (TR02). This was referred to in the Council's statements (CH04A, CH04B & CH04C) to the hearings in November 2013, together with responses to issues such as existing vacancy and land supply. This information was provided in response to the Inspector's Matters, Issues and Questions (EX06), leading to further discussion at the hearings in November 2013. Following this, the Inspector's First Interim Findings (EX26) suggested that on qualitative grounds there is justification for the early release of Green Belt sites to meet the specific needs for a high quality business park (following on from Kings Business Park).</p> <p>Kings Business Park is almost fully developed, with only 5.75 hectares of risk assessed land supply available as confirmed in the Council's statement (CH12C, Table 12C.4) to the hearings in July 2014.</p>
<p>Policy CS4: Target – Link between Housing and Employment</p>	<p>The relationship between residential development policies and the proposed employment land target was questioned, including:</p> <ul style="list-style-type: none"> • The Council's philosophy about new housing contributing to economic development and population retention is flawed • There is not enough employment in Knowsley to support a larger population • Little in the way of long term employment will come from vast housing estates • There are already not enough jobs to support 	<p>The Inspector's Second Interim Findings (EX34) suggest that the revision to the calculation of a five year housing land supply, together with the identification of Sustainable Urban Extensions (SUEs), the removal of the phasing mechanism for the release of these sites for development and the policy approach to employment supply and delivery, are sound.</p> <p>The Inspector's Matter, Issues and Questions (EX06) included a question (Qu. 3.4) querying the extent to which employment factors have been taken into account in determining the scale of housing need, and whether the scale of new housing is in balance with the anticipated growth in jobs. The Council</p>

08 POLICY CS4 EMPLOYMENT TARGET

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>the local community. More residents will lead to increased competition for jobs. This will result in increased unemployment and resentment from existing residents</p>	<p>response in document CH03A establishes that the scale of job growth planned for in the KLPCS broadly accords with the population growth which is estimated to result from the Plan's housing policies. This matter was discussed in further detail at the November 2013 hearings, and consequently the Inspector's Interim Findings (EX26) suggested that evidence from a wide range of sources indicated 183.5 hectares of employment land over the Plan period is towards the upper end of the range of probable needs. The resultant recommendation was a modification to 160 hectares up to 2028.</p>

09 POLICY CS4 EMPLOYMENT LAND SUPPLY

09 POLICY CS4: EMPLOYMENT LAND SUPPLY

- Policy CS4: Supply - availability of vacant units and land
- Policy CS4: Supply - effect of Green Belt release on delivery of previously developed sites
- Policy CS4: Supply - support for modifications
- Policy CS4: Supply - jobs
- Policy CS4: Supply - Kings Business Park
- Policy CS4: Supply - Shrogs Farm
- Policy CS4: Supply - Economic Viability

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
<p>Policy CS4: Supply – availability of vacant units and land</p>	<ul style="list-style-type: none"> • Building at ‘East of Knowsley Industrial and Business Parks’ is unsatisfactory when units around School Lane are half empty • 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 of these are within a 3 mile radius of the South of Whiston SUE • There are lots of empty premises in Knowsley Business and Industrial Park that could be used for future employment needs • The ‘Alchemy’ site in (Knowsley Industrial Park) still has land for sale • The former ‘Kodak’ site in (Knowsley Industrial Park) should be utilised • Build on Knowsley Industrial and Business Park 	<p>The Inspector’s Second Interim Findings (Examination library ref: EX34) suggest that the approach to employment land supply and delivery, together with the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The Council identified quantitative and qualitative needs for employment through evidence within the Joint Employment Land and Premises Study (EB07), Liverpool City Region Housing and Economic Development Evidence Base Overview Study (LC03) and Technical Report: Planning for Employment Growth (TR02). This was referred to in the Council’s statements (CH04A, CH04B & CH04C) to the hearings in November 2013, together with responses to issues such as vacancy, land supply and potential for remodelling of existing areas. This information was provided in response to the Inspector’s Matters, Issues and Questions</p>

09 POLICY CS4 EMPLOYMENT LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Kirkby is surrounded by industrial estates that are not being fully utilised. They should be surveyed before building further industrial areas • Huyton Business Park is likely to contain unused land or empty units • The occupancy of employment units recorded incorrectly in the Plan's supporting documentation • There are a lot of new developments in the area, including business parks so additional ones aren't required. • At Fallows way, it is believed that two of three units are vacant. The occupant could be encouraged to relocate to Huyton Business Park. Fallows Way could then be given over to housing. • The Council has no appetite to fill empty space in Huyton Business Park and at Fallows Way. • There are many brownfield sites or vacant units which are available for development • Reconsider the use of brownfield sites before land in the Green Belt is considered • Knock down empty business units • I wonder if anyone at the Council has bothered to look at the brownfield sites and at other sites that are unlikely to be used again 	<p>(EX06), leading to further discussion at the hearings in November 2013. Following this, the Inspector's First Interim Findings (EX26) suggested that on qualitative grounds there is justification for the early release of Green Belt sites to meet the specific needs for a high quality business park (following on from Kings Business Park) and to a lesser extent, for large scale distribution (to be accommodated at Land South of M62).</p> <p>The Council has reflected the requirement to evaluate the long term protection of land allocated for employment use (as required by NPPF Para. 22), including vacant land and premises in existing business parks. This evidence is presented in the Joint Employment Land and Premises Study which identified only sites within the South Prescott Action Area and land to the rear of Halewood International at Huyton Industrial Park as no longer suitable for employment development. For clarification it should be noted that there is not a significant headroom or surplus of employment land supply relative to requirements up to 2028 as demonstrated by Table 5.1A of the Local Plan: Core Strategy (Proposed modification M071).</p> <p>The Council's statement (CH12C, Tables 12C.3 and 12C.4) to the hearings in July 2014 provides details of the total and risk assessed plan period employment land supply. The latter informs Table 5.1A (proposed modification M071) of the KLPCS, although with a subsequent change to the capacity of the Land at Knowsley Lane SUE. This identified that the release of Green Belt is necessary to ensure a deliverable</p>

09 POLICY CS4 EMPLOYMENT LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> The area south of the M62 doesn't need more employment locations, existing areas just need to realise their full potential 	<p>employment supply is available to provide a range and choice of sites to address plan period needs up to 2028. This is notwithstanding existing land supply within Knowsley's existing business parks and industrial areas, such as Huyton Business Park, Knowsley Industrial and Business Parks and Whiston Enterprise Park (Fallows Way), which are expected to also contribute.</p> <p>The Inspector's Interim Findings suggested that the quantitative and qualitative evidence of the land supply necessary to support sustainable economic growth demonstrated exceptional circumstances to release land from the Green Belt.</p>
Policy CS4: Supply - effect of Green Belt release on delivery of previously developed sites	<ul style="list-style-type: none"> The Council has admitted that the early release of Green Belt will delay the development of brownfield sites 	<p>The Inspector's Second Interim Findings (EX34) suggest that the approach to employment land supply and delivery, together with the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The Council provided a written response (CH05A) to the Inspector's Matters, Issues and Questions (EX06) including justification for the original clause 3(b) in policy CS5 relating to urban regeneration and phasing. However following consideration of evidence and discussion at the November 2013 hearings, the Inspector's Interim Findings (EX26), whilst acknowledging concern about such an impact, noted that it should be supported by compelling evidence that the early release of a particular reserve location would significantly undermine delivery of a Principal Regeneration Area.</p>

09 POLICY CS4 EMPLOYMENT LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>The Council's Sustainability Appraisal (SD28) of the preferred option for the proposed modification (i.e. allocation of all SUEs) in the Technical Report: Sustainable Urban Extensions (TR07, pg.52) acknowledges concern that the approach may lead to competition with, and risk the delivery of employment led-regeneration (with particular regard to the East of Knowsley Industrial and Business Parks SUE). However this risk is outweighed by the benefits to the scope for employment delivery to address qualitative and quantitative plan period requirements and gateway enhancements that may assist regeneration. Furthermore, the Council is aware of no evidence that would categorically prove a negative impact on any of the PRAs as a result of allocating the SUEs. This does not confirm that there would not be any adverse impact, but that such an impact cannot be proven at this stage. The Council has previously provided written evidence on this matter in its statements to the reconvened hearings in July 2014 (document CH13A).</p>
Policy CS4: Supply – support for modifications	<ul style="list-style-type: none"> • Support for additional text stating preference to accessible, well connected sites 	Comment noted - no response required.
Policy CS4: Supply - jobs	<ul style="list-style-type: none"> • There are currently no jobs and the proposals will not bring anymore to the Borough • Any employment gains in the building industry are short term and have little impact on local unemployment 	<p>The Inspector's Second Interim Findings (Examination library ref: EX34) suggest that the approach to employment land supply and delivery, together with the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p>

09 POLICY CS4 EMPLOYMENT LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Already not enough jobs to support the local economy. More residents will lead to increased competition for jobs • No evidence the development of the South of Whiston SUE will bring employment to the area • The industrial estate at Windy Arbor Road has little impact on employment as the few units that are occupied have no need for additional workers 	<p>The evidence base which informed the Council approach to employment requirements and deliverability includes the Joint Employment Land and Premises Study (EB07), Liverpool City Region Housing and Economic Development Evidence Base Overview Study (LC03), Employment Position Statement (SD23) and Technical Report: Planning for Employment Growth (TR02).</p> <p>Policy CS4 focuses new employment investment into existing and new locations in Knowsley enabling support for the growth of businesses and job opportunities. Interventions and new infrastructure to improve the accessibility of employment areas to Knowsley residents are sought through this and wider policies in the KLPCS. The policy also supports wider initiatives encouraged through the Council's Economic Regeneration Strategy (PG32) to provide training and support attainment levels of residents.</p> <p>The proposed development within the South of Whiston SUE is complemented by new employment opportunities associated to the neighbouring Land South of M62 SUE. The South of Whiston SUE (and its neighbouring area) is also close to existing employment areas (Whiston Enterprise Park and Huyton Business Park) and has access to wider opportunities via sustainable modes of travel and the adjacent strategic highway network (M62 / M57 / A5300).</p>
Policy CS4: Supply –	<ul style="list-style-type: none"> • The owners of Kings Business Park have an option to increase the size of the park for B1 	<p>The Inspector's Second Interim Findings (Examination library ref: EX34) suggest that the approach to employment land</p>

09 POLICY CS4 EMPLOYMENT LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Kings Business Park	<p>(office) uses to the north of the site</p> <ul style="list-style-type: none"> • There are 10 vacant units at Kings Business Park • Kings Business Park is ¾ empty 	<p>supply and delivery, together with the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The Council identified qualitative needs for a successor site to Kings Business Park through evidence within the Joint Employment Land and Premises Study (EB07), Liverpool City Region Housing and Economic Development Evidence Base Overview Study (LC03) and Technical Report: Planning for Employment Growth (TR02). This was referred to in the Council's statements (CH04A, CH04B & CH04C) to the hearings in November 2013, together with responses to issues such as existing vacancy and land supply. This information was provided in response to the Inspector's Matters, Issues and Questions (EX06), leading to further discussion at the hearings in November 2013. Following this, the Inspector's First Interim Findings (EX26) suggested that on qualitative grounds there is justification for the early release of Green Belt sites to meet the specific needs for a high quality business park (following on from Kings Business Park).</p> <p>Kings Business Park is almost fully developed, with only 5.75 hectares of risk assessed land supply remaining as confirmed in the Council's statement (CH12C, Table 12C.4) to the hearings in July 2014.</p>
Policy CS4: Supply –	<ul style="list-style-type: none"> • Land at Shrogs Farm should be released from the Green Belt to help meet 	<p>The Council's statements (CH05B) to the hearings in November 2013, provided justification as to why the</p>

09 POLICY CS4 EMPLOYMENT LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Shrogs Farm	employment needs	<p>alternative site: Land at Shrogs Farm is unsuitable for release from the Green Belt. This information was provided in response to the Inspector's Matters, Issues and Questions (EX06, Qu.5.26), leading to further discussion at the hearings in November 2013. Following this, the Inspector's First Interim Findings (EX26) suggested that none of the proposed alternative locations warrants inclusion in the KLPCS. The Inspector's Second Interim Findings (EX34) reflected on the further representations relating to Green Belt sites proposed by landowners which are not included in the Plan, but did not propose additions to the sites selected by the Council.</p> <p>The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Shrogs Farm as it is within an "Essential Gap" between two settlements. The release of this area of land would conflict with national Green Belt policy.</p>
Policy CS4: Supply - Economic Viability	<ul style="list-style-type: none"> • Developer's preference to build on more lucrative Green Belt land over brownfield sites does not justify Green Belt release • Economic viability of brownfield land should not be a concern of the Council, which does not own the Green Belt 	<p>The Inspector's Second Interim Findings (EX34) suggest that the approach to employment land supply and delivery, together with the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The Council's statement (CH12C, Tables 12C.3 and 12C.4) to the hearings in July 2014 provides details of the total and risk assessed plan period employment land supply. The latter informs Table 5.1A (proposed modification M071) of the KLPCS, although with a subsequent change to the capacity of</p>

09 POLICY CS4 EMPLOYMENT LAND SUPPLY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>the Land at Knowsley Lane SUE. These details were informed by the Inspector’s Initial Findings – Employment Clarification (AD48) which included an appraisal of the deliverability of employment sites with appropriate discounting to address concerns relating to risk assessment within the Inspector’s Interim Findings (EX26) following the hearings in November 2013. The calculations in AD48 include realistic assumptions about the availability, suitability and economic viability of delivery of employment land to meet the identified needs over the plan period in accordance with NPPF paragraph 159, as informed by the Council’s evidence base.</p>

10 POLICY CS5

10 POLICY CS5

- Policy CS5: Proposed modification - M076
- Policy CS5: Proposed modification - M078
- Policy CS5: Proposed modification - M079

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS5: Proposed modification - M076	Welcome inclusion of reference to very special circumstances as part of Policy CS5.	Comment noted - no response required.
Policy CS5: Proposed modification - M078	The modification seeks to insert wording which is not in itself “policy” and provides information. This text should be included in the supporting justification and is not necessary within the body of the policy.	This recommendation is not a matter of soundness or legal compliance, as the Council’s approach to Green Belt in terms of the allocation of Sustainable Urban Extensions is relevant to the interpretation of Policy CS5.
Policy CS5: Proposed modification - M079	Welcome removal of the Sustainable Urban Extensions from the Green Belt as part of Policy CS5.	Comment noted - no response required.

11 POLICY CS6

11 POLICY CS6

- Policy CS6: Additional Retail development
- Policy CS6: Retail in Whiston

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS6: Additional Retail development	Creating any further shopping outlets will also damage the local businesses causing further unemployment	<p>The Inspector's Interim Findings (EX26) suggest that the approach to retail in the KLPCS is sound, subject to a proposed modification to policy CS10 to ensure alternative schemes to the existing approval for town centre expansion in Kirkby are critically appraised. The associated proposed modification (M145) was recently consulted upon.</p> <p>The Knowsley Town Centres and Shopping Study (EB12 & EB13) and the Technical Report: Planning for Retail in Knowsley (TR04) include information relating to the scale of potential growth and associated catchment areas which are not expected to impact upon existing centres or provision.</p> <p>Any planning applications received for development with floorspace above 2,500 sq.m. will be required to include an impact assessment in accordance with NPPF paragraph 26.</p>
Policy CS6: Retail in Whiston	<p>Concerns were raised about the potential impact of new retail units associated with the development of the SUE at South Whiston, including:</p> <ul style="list-style-type: none"> • Whiston Village shopping area and surrounding area are underused due to Tesco and various 	This issue raises no concerns in terms of soundness and legal compliance. Evidence within the Monitoring Report 2013 (PP24) indicated that Greenes Road District Centre in Whiston had 0% vacancy of A1 - A5 units when surveyed at August 2013.

11 POLICY CS6

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>outlets.</p> <ul style="list-style-type: none"> • If more outlets are created then local stores would vanish • The village centre would shift to the new shops, leaving the old shops derelict 	<p>Policy SUE 2c requires consideration of requirements for local retail provision (identified as convenience retail in policy CS6 clause 5c) to address needs arising from the site and/ or appropriate financial contributions to address these needs off-site. Any planning applications received will therefore be required to justify the scale of any proposal relative to the level of need arising, and any proposals with floorspace above 2,500 sq.m. would be also required to submit an impact assessment in accordance with NPPF paragraph 26.</p>

12 POLICY CS7

12 POLICY CS7

- Policy CS7: developer contributions
- Policy CS7: Fallows Way
- Policy CS7: reduction in public transport provision

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS7: developer contributions (South of Whiston)	<ul style="list-style-type: none"> • Many very significant costs for the South of Whiston SUE have not been costed by the Mott MacDonald Infrastructure and Development Options Study. These include contributions for public transport improvements, off-site highway works (i.e. Tarbock Island). 	<p>The Inspector's Second Interim Findings (Examination library ref: EX34) suggest that the revision to the calculation of a five year housing land supply, the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development together with the approach to infrastructure delivery and developer contributions, are sound.</p> <p>The South Whiston and Land South of M62 Infrastructure and Development Options Study (AD51) was unable to provide precise estimated costs for some abnormal infrastructure costs that may arise from this strategic site, however there is no evidence that the potential costs would make the development unfeasible.</p>
Policy CS7: Fallows Way	<ul style="list-style-type: none"> • Utilising empty units at Fallows Way, Huyton Business Park for residential uses would reduce the number of large lorries that use Windy Arbour Road each day and reduce congestion 	<p>The Council has evaluated the scope for long term protection of land allocated for employment use (as required by NPPF Para. 22), including vacant land and premises in existing business parks. This evidence is in the Joint Employment Land and Premises Study which identified only sites within the</p>

12 POLICY CS7

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>South Prescot Action Area and land to the rear of Halewood International at Huyton Industrial Park as no longer suitable for employment development. For clarification it should be noted that there is not a significant headroom or surplus of employment land supply relative to requirements up to 2028 as demonstrated by Table 5.1A of the Local Plan: Core Strategy (Proposed modification M071).</p> <p>The Transport Feasibility Study (EB10) and Transport Modelling Report (EB11) also identified that there are no key issues in principle which would preclude delivery of the Core Strategy. Site specific mitigation will be provided where appropriate.</p>
<p>Policy CS7: reduction in public transport provision</p>	<ul style="list-style-type: none"> • Bus routes and timetables have been revised, leaving only a minimal bus service in evenings • Network Rail have undertaken passenger surveys with a view to closing Whiston railway station. • Changes to public transport provision are likely to increase car usage which will have a negative impact 	<p>This is not a soundness or legal compliance issue.</p> <p>Policy CS7 states that the Council will work with regional and sub-regional partners to give priority to schemes which ... would provide for ... enhanced provision of buses. The Council continues to work closely with Merseytravel through the implementation of the Local Transport Plan. The Council will also work with regional and sub-regional partners to give priority to schemes which would provide for the enhancement of the principal bus routes through Quality Bus Partnerships and Quality Bus Contracts.</p> <p>Network Rail and Merseytravel undertake passenger surveys periodically at all train stations to ensure that the timetable of services remains effective. There is no reason to suggest that such a survey will indicate the potential closure of Whiston or</p>

12 POLICY CS7

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>any other station and the Council is not aware of any proposals of this nature based upon recent evidence and consultation.</p> <p>New development (except small scale proposals) will be required to be accompanied by Transport Assessments and/or Travel Plans by Policy CS7. Where required, developer contributions towards strategic transport schemes and programmes will be sought in accordance with Policy CS27. These may include contributions towards public transport provision where necessary to make the development acceptable in planning terms, directly related and fairly and reasonably related in scale and kind to the development.</p>

13 POLICY CS8

13 POLICY CS8

- Policy CS 8: Proposed modification - M117
- Policy CS 8: Proposed modification - M122
- Policy CS 8: Proposed modification - M123
- Policy CS 8: Proposed modification - M127 – support
- Policy CS 8: Proposed modification - M127 – recommendation
- Policy CS 8: Proposed modification - M128
- Policy CS 8: Green Belt release - inconsistent with policy CS8

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS 8: Proposed modification - M117	Modification to Policy CS8 clause 1(b) welcomed.	Comment noted - no response required.
Policy CS 8: Proposed modification - M122	Welcomed the previous iteration of Policy CS8 clause 6(c), which provided a more positive emphasis on the need to enhance the natural environment as well as protect it. Recommend this should read <i>“seek to protect, maintain and enhance biodiversity”</i> .	This is not a soundness or legal compliance issue. The Proposed Modification to this clause of policy CS8 is necessary to ensure adequate flexibility for consideration of circumstances where there are limited opportunities for enhancement. The requested further change is therefore not appropriate.
Policy CS 8: Proposed modification - M123	To ensure consistency with the Council’s intention to replace the Greenspace Standards and New Development SPD with a Developer Contributions SPD, expect to see GI and GI	This is not a soundness or legal compliance issue. The content and guidance within a Developer Contributions SPD will be subject to future consultation.

13 POLICY CS8

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	standards fully incorporated into this new SPD.	
Policy CS 8: Proposed modification - M127 - support	Welcome insertion of new paragraphs 5.95A and 5.95B detailing the Protection of Green Infrastructure, Natural Assets and Biodiversity.	Comment noted - no response required.
Policy CS 8: Proposed modification - M127 - recommendation	The key priorities in paragraph 5.95 should include the full hierarchy of designated sites as listed in paragraph 5.95B. First bullet should be re-worded as “manage the natural assets better - to protect the integrity of all designated nature sites, and to.....”	This is not a soundness or legal compliance issue. The wording of the proposed modification is deliberate, given the level of protection to designated sites of international importance (i.e. European sites) is greater than non-statutory designations. The recommended change is therefore not necessary given paragraph 5.95 guides protection of remaining nature and geodiversity assets in any case.
Policy CS 8: Proposed modification - M128	In section associated to new paragraph 5.95D 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 – mitigation and compensation options will need to follow strident tests set out in the regulations.	This is not a soundness or legal compliance issue. The reference to “ <i>in some circumstances</i> ” ensures that restrictions associated to European and internationally important sites are adhered to, in association with paragraph 5.95C.
Policy CS 8: Green Belt release - inconsistent with policy CS8	The plan is unsound and not legally compliant because: <ul style="list-style-type: none"> • The release of South Whiston is inconsistent with the policy approach of policy CS8. 	This is not a soundness or legal compliance issue. The removal of land at South of Whiston from the Green Belt and allocation as a Sustainable Urban Extension does not preclude the need for any future planning application(s) to comply with Policy CS8. There is no reason to suggest that a development that complies with Policy CS8 cannot be

13 POLICY CS8

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		achieved at South of Whiston in association with Policies SUE1, SUE2 and SUE2c.

14 POLICY CS11

14 POLICY CS11

- Policy CS11: Proposed Modification M150 – CS11 1(a)
- Policy CS11: Proposed Modification M150 – CS11 1(d)

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS11: Proposed Modification M150 – CS11 1(a)	Support for proposed modification M150 – relating to the reference to Lees Road as a gateway location in Policy CS11 1(a)	Welcomed.
Policy CS11: Proposed Modification M150 – CS11 1(d)	<p>Objection to proposed modification M150 – relating to the lack of justification for a local service centre to be located specifically at South Boundary Road in Policy CS11 1(d). Request that the plan text references a more generic location, and that the location of the services hub be delegated to the Local Plan Site Allocations and Development Policies document in order that consideration can be given the suitability, availability and viability of sites. Academy Business Park could provide a suitable location for such a services hub.</p> <p>An application (ref: 11/00055/OUT) for mixed use development at South Boundary Road was refused in 2011. Therefore, policy CS 11 is not justified or effective</p>	<p>This is not a soundness or legal compliance issue.</p> <p>The Council supports its policy approach of a services hub at South Boundary Road with close links to the existing Admin Road local centre as the priority location for shopping and services to meet local needs in Policy CS11.</p> <p>The Council does not accept that the Academy Business Park site is a more appropriate location for local shopping and services given it is an out of centre location, and noting its proximity to an existing local centre (Broad Lane / Park Brow Drive) and Kirkby Town Centre.</p> <p>Planning application (ref: 11/00055/OUT) was refused prior to consultation on the Proposed Submission version of the KLPCS. The site has subsequently received planning permission for employment purposes in accordance with its</p>

14 POLICY CS11

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	Suggested revisions to policy CS11 & para 6.27 to state that the Site Allocations document will define the location for the 'services hub'.	existing UDP allocation.

15 POLICY CS14

15 POLICY CS14

- Policy CS 14: prioritise brownfield sites
- Policy CS 14: Home Bargains store

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS14: prioritise brownfield sites	<ul style="list-style-type: none"> • Don't need more shops - use Prescot Town Centre • Use brownfield sites in Prescot first, such as Scotchbarn Lane School, former British Insulated Callenders Cables (BICC) and swimming baths 	This is not a soundness or legal compliance issue. Proposals for additional retail require compliance with the sequential test in policy CS4 and the requirements of policy CS6 of the KLPCS. The brownfield sites referred to are already included within the Council's housing land supply.
Policy CS14: Home Bargains store	<ul style="list-style-type: none"> • Do not allow the proposed Home Bargains store to be built - additional large shops are not required for Prescot 	<p>This is not a soundness or legal compliance issue.</p> <p>This representation refers to a current planning application (ref: 14/00478/FUL) for a retail development on Manchester Road in Prescot which is undetermined at the time of writing this document. Although the Council's Planning Committee resolved on 11 December that it was minded to grant planning permission this is subject to the applicant entering into an appropriate legal agreement with the Council. This planning application is being dealt with on its merits and its determination (whether to approve or refuse) will not impact on the soundness of policy CS14..</p>

16 PRESCOT, WHISTON, CRONTON AND KNOWSLEY VILLAGE AREA

16 PRESCOT, WHISTON, CRONTON AND KNOWSLEY VILLAGE AREA

- PWCKV Area - Paragraph 6.45

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
PWCKV Area - Paragraph 6.45	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Paragraph 6.45 is flawed and mostly irrelevant - highlights a lack of understanding of local issues with Knowsley taking a “one solution fits all approach” • Little mention is made of requirement for additional facilities, such as health care, clinic, GP surgeries, dentist, nursery and school requirements. • Paragraph 6.45 cannot be met, together with associated strategic objectives. 	<p>This is not a soundness or legal compliance issue.</p> <p>The area priorities are consistent with the Local Plan: Core Strategy strategic objectives and guide the detailed policy approaches seeking to deliver to each priority within the Plan, as informed by the Council’s comprehensive evidence base.</p> <p>The need for additional facilities and infrastructure to support and / or facilitate new development in Prescott, Whiston, Cronton and Knowsley Village will be secured through the implementation of policies CS2, CS4, CS6, CS7, CS8, CS13, CS14, SUE2, SUE2c, CS21, CS24 and CS27.</p>

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

17 SUSTAINABLE URBAN EXTENSIONS GENERAL

- SUE General - Policy SUE 2
- SUE General - master planning and site delivery
- SUE General - Support for M168
- SUE General - Green Belt purposes
- SUE General - updated guidance from central Government
- SUE General - Green Belt principles
- SUE General - highways
- SUE General - social issues
- SUE General - amenity
- SUE General - flora and fauna
- SUE General - flooding
- SUE General - Infrastructure
- SUE General - minerals
- SUE General - air quality
- SUE General - soils and agricultural land
- SUE General - non planning issues

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
SUE General - Policy SUE 2	<ul style="list-style-type: none"> • General support for policy SUE2, however the added value of the policy is unclear due to repetition with other policies (i.e. SD1, CS2, CS 7-8, CS19, CS 20-21, CS24 and CS27). • Elements of Policy SUE2 could be omitted or included as supporting text. • Removal of phasing mechanism via the 	<p>In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Policy SUE 2 draws together the priorities for development of the Sustainable Urban Extensions. In doing so the policy reasonably cross refers to other relevant KLPCS policies. Such an approach follows the principles of considering the</p>

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	modifications is noted and supported.	development plan as a whole.
SUE General - master planning, SUE SPDs and site delivery	<ul style="list-style-type: none"> • Many decisions have been deferred to the 'development management' stage and there is no clear guidance on what this means. • The master planning of specific SUEs has been introduced; however this should have been carried out as part of the submission version of the Plan. • The Green Belt sites should not be allocated until the proposed Supplementary Planning Documents have addressed highway and infrastructure issues in detail. • Key risks to delivery such as infrastructure provision and landowner aspirations have been understated. • There is a conflict between the Council's identification of risks to delivery of the SUEs when they have stated that the SUEs are deliverable. 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). The Council has demonstrated exceptional circumstances to justify the release of all of the SUE sites from the Green Belt. In his Interim Findings, the Inspector has found the Council's approach as set out in the proposed modifications to be sound (Examination library reference EX26 and EX34), including the deliverability of SUEs, and the approach to master planning and decision making in accordance with Supplementary Planning Documents.</p> <p>The policies in the KLPCS provide the strategic framework for development of Knowsley and there is no reason to suggest that appropriately designed new development cannot be achieved within each of the SUEs. However the policies also aim to encourage development proposals that comply with the KLPCS as a whole by establishing the development principles and requiring master planning (where appropriate). Decision making on the detail of development will necessarily be via applications for planning permission in accordance with the Town and Country Planning Act 1990.</p> <p>The SUE policies and associated master planning approach were introduced as proposed modifications in response to the Inspectors Interim Findings (EX26). The proposed</p>

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>modifications aim to make the KLPCS sound following the removal of the phasing elements of Green Belt release as part of Policy CS5, which would have deferred allocations to a later development plan document. In such circumstances it is not reasonable to expect the Council to have carried out the master planning process as part of the submission version of the Plan.</p>
<p>SUE General - Support for M168</p>	<ul style="list-style-type: none"> • General support for amendments that are proposed through M168 (i.e. inclusion of additional chapter to address proposed SUEs) • Support for the wording of policy SUE 1 and the recognition that these sites are meeting needs within the current plan period. 	<p>Noted and welcomed.</p>
<p>SUE General - Green Belt purposes and NPPF</p>	<ul style="list-style-type: none"> • The development of the 'A58, Prescott' and 'Knowsley Lane, Huyton' SUEs would result in the merging of Prescott and Huyton. This is contrary to the NPPF • Green Belt is supposed to prevent urban sprawl, the proposals for Green Belt release will cause Whiston and Cronton to merge with St Helens and Halton respectively. • The five purposes of the Green Belt stated in the NPPF should be adhered to. • Where does the Council's strategy account for protecting the Green Belt in line with the NPPF (section 9, para 79- 	<p>All SUE sites (and the safeguarded land) have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at previous stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p>

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>92)?</p> <ul style="list-style-type: none"> • There is limited Green Belt in Knowsley and it provides an important area of greenspace within an area of urban sprawl. • The Council has not demonstrated exceptional circumstances to justify Green Belt release in the context of the five purposes of Green Belt within national planning policy. 	
SUE General - Updated guidance from central Government	<ul style="list-style-type: none"> • Attention should be given to the latest Government guidance produced which states that once altered Green Belt boundaries should only be altered in exceptional circumstances. • Eric Pickles recently made announcements that planners should protect the Green Belt and that any incursions into the Green Belt must be planned in a logical and strategic way. • Except for developer's profit, there are no exceptional circumstances to release land from the Green Belt. 	<p>All SUE sites (and the safeguarded land) have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). The Council's evidence has demonstrated exceptional circumstances to justify the release of this and the other SUE sites from the Green Belt. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>DCLG changes to Planning Practice Guidance on Green Belt, as covered in the Secretary of State announcements and the Planning Ministerial Statement about the protection of the Green Belt and prioritisation of brownfield sites, do not appear to alter the conclusion that exceptional circumstances justify release of SUE sites from the Green Belt.</p>
SUE General -	<ul style="list-style-type: none"> • The evidence to support the removal of 	All SUE sites (and the safeguarded land) have been assessed

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
principle of Green Belt release	<p>the Green Belt sites is light touch.</p> <ul style="list-style-type: none"> • The North West does not have a housing shortage like London and South East so Green Belt release is not required. • The Plan as proposed does not show how the Council arrived at the choice of preferred Green Belt release sites when brownfield sites are available elsewhere. • Green areas should remain and be kept for the environment and future generations • The planned Green Belt release is contrary to the NPPF, Town and Country Planning Regulations and sustainability appraisal report. • The release of Green Belt conflicts with the Council's Greenspace Strategy. • The release of Green Belt should be a last resort. • Releasing Green Belt is not the right way to address the housing shortage • Guidance states that Council's should take account of constraints (such as Green Belt) which indicate that development should be restricted and may restrain an authority's ability to meet its own needs. • A range of Knowsley Council's strategic goals will not be achieved by releasing Green Belt 	<p>in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have already been considered within this process or at previous stages of Plan preparation. The Council's previous evidence demonstrated exceptional circumstances to justify the release of the SUE sites from the Green Belt.</p> <p>The Council proposed the prioritisation of brownfield land as part of the KLPCS (submission version) which included a phasing 'mechanism' that would restrict the release of Green Belt until it was needed to maintain a supply of deliverable sites. This approach is evidenced by Council's written statement (CH05A). Following the Local Plan hearings the Plan was found to be unsound with regard to land supply. Therefore proposed modifications including the early release of Green Belt sites have been developed to address these soundness issues. The Sustainable Urban Extensions Technical Report demonstrates that this approach is the only option that allows the Council to demonstrate a deliverable housing land supply The Inspector's Second Interim Findings (EX34) suggest that the approach to housing and employment land supply and delivery, together with the identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development, are sound.</p> <p>The extent to which the policy approaches in the KLPCS</p>

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>support the Council's strategic objectives is assessed and informed via the Sustainability Appraisal process. The sustainability appraisal is an iterative process which aims to promote sustainable development within the Local Plan by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. Sustainability appraisal has been an integral part of the preparation and development of the KLPCS, to identify how sustainable development is being addressed and has been undertaken independently at each stage of plan preparation (Examination library reference: SD07, SD07a, SD08, SD08a, SD09, SD09a, SD10, SD10a, SD10b, SD28, SD28a, SD28b and TR07). The Sustainability Appraisal reports help to integrate different areas of evidence and to demonstrate why the proposals in the Local Plan are the most appropriate.</p> <p>There is no conflict with the Council's Green Space Strategy, as KLPCS policies CS8 and CS21, with which development proposals will need to comply, will afford protection to as appropriate to green infrastructure and greenspaces.</p>
SUE General - highways	The modifications to the Plan represent a change to the submitted document. The capacity of the allocated SUEs differs from that assessed by the Council's evidence base. This may have implications for the strategic road network	Highway requirements are covered by the proposed SUE policies. Following strategic studies (e.g. Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring that SUEs can be served by appropriate highway infrastructure. For some sites, on or off site highway works will be necessary, but it is

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>The release of Green Belt land for development will cause:</p> <ul style="list-style-type: none"> • an increase in traffic and dependency on car travel; and • life to get harder as it will take longer to get around locally. 	<p>considered that these are best assessed and agreed with the developer at the planning application stage in accordance with Policies CS7 and CS27, alongside the SUE policies. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway works within the developer contributions process (see policy CS27 as modified, clause 7 and table 10.2 of the Plan).</p> <p>The Highways Agency representations relating to the strategic highway network and the Council's current transportation evidence base have been withdrawn. This is in line with the Statement of Common Ground between the Highways Agency and Knowsley Council (AD59).</p>
SUE General - social issues	<p>The release of Green Belt land for development will:</p> <ul style="list-style-type: none"> • Cause an increase in crime, disorder, fear of crime; • Cause a destruction of Knowsley's identity; • Have a detrimental impact on the communities in Knowsley; • Create a loss of Green Belt for future generations; • Spoil the character of the towns and villages in Knowsley; and • have an adverse impact on the level of physical activity and wellbeing of 	<p>These concerns are acknowledged. However, there is no evidence to suggest that appropriately designed new development would cause significant harm to the quality of life of existing residents to an extent which renders the KLPCS unsound.. Furthermore the design of development will be subject to the detailed requirements of other Local Plan policy requirements relating to sustainable development and preventing an unacceptable level of impact upon surroundings when a planning application is submitted.</p> <p>KLPCS Policies CS8 and CS21 aim to ensure provision for green infrastructure and greenspaces as part of new development proposals.</p>

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>residents and other local population groups</p>	
SUE General - amenity	<p>The proposed Green Belt allocations will cause:</p> <ul style="list-style-type: none"> • An increased amount of noise (especially if new housing abuts existing households); • A loss of landscapes and encroachment into the countryside; • A potential drop in house prices due to a loss of amenity / views 	<p>These concerns are acknowledged. However, there is no evidence to suggest that appropriately designed new development would cause significant harm to the quality of life of existing residents to an extent which renders the KLPCS unsound. Impact on property valuations is not a soundness issue. Furthermore the design of development will be subject to detailed requirements in the context of other Local Plan policy requirements relating to sustainable development and preventing impact upon surroundings when a planning application is submitted..</p>
SUE General - flora and fauna	<ul style="list-style-type: none"> • A detailed environmental impact assessment is required for all sites under consideration • All of the SUEs contain flora and fauna and species on the at risk register (i.e. lapwing, skylark, bats and crested newt) • A loss of farmland wildlife including declining species (i.e. skylark, yellow hammer, partridge and hare) • Further encroachment into the green areas would be environmental vandalism • Greenspace provides vital recreational space • The release of Green Belt will cause the loss of ancient woodland 	<p>Habitats for flora and fauna have been considered as part of all of the process of selecting the proposed SUEs. Key biodiversity assets have been protected through the approach to the selection of appropriate SUE locations, and the identification of the developable areas within these locations. Any impacts on flora and fauna and their habitats will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS8 and CS19, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
SUE General - flooding	<p>The proposed release of Green Belt land for development will:</p>	<p>The extent of flood risk has been considered as part of the process of selecting the proposed SUEs. The Green Belt</p>

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Potentially cause an increase in flooding: • Increase flooding due to some sites being within a flood plain 	<p>Study (Examination library reference EB08) outlines how flood risk issues have been considered in relation to the selection of Green Belt locations. Within the Strategic Flood Risk Assessment (Level 2) (Examination library reference EB15), areas of some SUE site have been identified as being Flood Zone 2 and / or Flood Zone 3 with notional capacities in the KLPCS adjusted accordingly. The findings of the SFRA (Level 2) have been accepted by the Environment Agency. A more detailed site-specific Flood Risk Assessment will be required for the sites affected by flood risk prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
SUE General - infrastructure	<ul style="list-style-type: none"> • Many sites may require upfront investment in infrastructure. • United Utilities acknowledge that following the allocation of a site, applications are prepared in advance of the preparation of master plans and independently of other landowners. Thus creating an approach which is not comprehensive or the most sustainable. • United Utilities wishes to highlight the difficulties in coordinating delivery of larger sites across multiple site ownerships. Infrastructure delivery should be supported by a site-wide infrastructure strategy for the entirety of 	<p>Infrastructure provision has been considered as part of the process of selecting the proposed SUEs. Following liaison with a range of infrastructure providers, there have been no significant issues identified in ensuring that SUEs can be served by appropriate infrastructure, including utilities, schools and doctors. The need for comprehensive development of SUE sites and requirement for master planning in accordance with Policies SUE2, SUE2a, SUE2b and SUE2c reflects the need for a strategic approach to infrastructure delivery.</p> <p>For some sites, on or off site infrastructure improvements may be necessary as a result of development and these will be assessed at the planning application stage in accordance with Policy CS27, alongside the SUE policies.</p>

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>each allocation.</p> <ul style="list-style-type: none"> • The Infrastructure Delivery Plan does not detail any public transport or highway improvements to deal with increased traffic. • For the larger SUEs it will be necessary to ensure development is guided by strategies for infrastructure which ensure coordination of United Utilities infrastructure delivery over prolonged periods of time. • United Utilities will be able to better understand the potential impacts of development on infrastructure at planning application and master planning stages. • Air quality in Knowsley is worse than the North West average, with Knowsley's having the highest concentration of pollutants of all districts in Merseyside. <p>The release of Green Belt will:</p> <ul style="list-style-type: none"> • Have a general negative impact on infrastructure as it cannot cope with the increase in homes; • have a negative impact on amenities and services; and • place additional pressure on doctors, schools and hospitals. 	<p>As part of the process of justifying and collecting developer contributions, the Council intends to maintain an up-to-date Infrastructure Delivery Plan which details the Council's future needs.</p>
SUE General -	<ul style="list-style-type: none"> • The proposed modifications address the 	The Coal Authority has been consulted at every stage of plan

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
minerals	<p>concerns of the Coal Authority regarding mineral safeguarding and mining legacy.</p> <ul style="list-style-type: none"> • The issue of mineral sterilisation should be identified within the 'Key Site Constraints and Opportunities' sections of relevant SUE Allocation Profiles (i.e. Knowsley Lane, Huyton and South Whiston & Land South of M62). 	<p>preparation and has not objected to the feasibility of developing the SUE sites. The consideration of issues of prior mineral extraction, mineral safeguarding and mining legacy can be appropriately considered through the master planning process and when a planning application is received.</p>
SUE General - air quality	<ul style="list-style-type: none"> • The areas adjacent to the SUEs would be subject to additional air pollution due to congested roads. • The loss of greenery as a result of development will increase carbon dioxide which will have health implications. 	<p>Knowsley currently has no Air Quality Management Areas designated. Through the identification of the SUEs, no evidence in terms of a particular risk to air quality as a result of new development has been identified. The potential for impacts on air quality arising from development will be assessed as part of planning applications, in accordance with Policy CS2, alongside the SUE policies.</p>
SUE General - soils and agricultural land	<p>The release of Green Belt will:</p> <ul style="list-style-type: none"> • Sacrifice food quality farm land; • Reduce food production within a country that cannot meet its own food production requirements; • Cause a reduction in soil within the Green Belt that acts as a carbon store which makes an important contribution to Government carbon reduction commitments; and • Cause the loss of Grade 2 agricultural land, which cannot enhance Green Infrastructure in line with the Plan's 	<p>The Council has previously provided a written response (CH05A) to the Inspector's Matter, Issues and Questions (EX06, Qu. 5.5) relating to the loss of agricultural land, with further discussion at the hearings in November 2013. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p>

17 SUSTAINABLE URBAN EXTENSIONS - GENERAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>objective.</p> <p>More investment / support needs to be provided for agricultural development and education to deliver sustainable communities.</p>	
SUE General - non planning issues	<ul style="list-style-type: none"> • The decision to release the Green Belt has been made by a non-elected Inspector who does not live in the area. • The process relating to Green Belt release in Knowsley calls into question suggestions that more decisions will be carried out locally and the democratic process generally. 	<p>The KLPCS proposed modifications reflect the Council's response to issues raised within the Inspector's Interim Findings (EX26), including consideration of reasonable alternatives. The KLPCS has been subject to appropriate consultation at each stage of plan preparation in accordance with the relevant national legislation.</p>

18 BANK LANE, KIRKBY

18 BANK LANE, KIRKBY

- Bank Lane, Kirkby – Existing Use
- Bank Lane, Kirkby – Proposed Use
- Bank Lane, Kirkby – Highways

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Bank Lane, Kirkby – Existing Use	Concern that the existing landfill could cause safety issues for the development of the site e.g. gas, asbestos, subsidence. There have been issues with the building of houses on landfill sites in other parts of the country	<p>All SUE site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Furthermore, the re-use of a brownfield site offers a range of sustainability and regeneration benefits which are noted by the Sustainability Appraisal - Green Belt Locations (Examination library reference SD08/08a).</p> <p>In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Outline planning permission has been granted at this site (ref: 13/00393/OUT). A reserved matters application is currently under consideration (ref: 14/00874/REM). Issues such as ground conditions and public safety are considered as part of the development management process and are dealt with via condition.</p>
Bank Lane – Proposed Use	There is plenty of housing in the area already; any new housing would cause overcrowding.	Outline planning permission has been granted at this site (ref: 13/00393/OUT). There is no evidence that new housing on this site would cause overcrowding. A reserved matters application is currently under consideration (ref:

18 BANK LANE, KIRKBY

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		14/00874/REM).
Bank Lane – Highways	Congestion needs to be addressed as part of the development of the site. Consideration must be given to the traffic signals at the junction of Melrose Road and Bank Lane.	Highway provision has been considered as part of all the proposed SUEs and in the consideration of the outline planning application for this site – see above, with improvements secured by legal agreement. Following strategic studies (e.g. Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring that the SUEs can be served by appropriate highway infrastructure. For some sites, on or off site highway works will be necessary, but these are best assessed and agreed with the developer at the planning application stage in accordance with Policies CS7 and CS27, alongside the SUE policies. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway works within the developer contributions process.

19 EAST OF KNOWSLEY INDUSTRIAL PARK

19 EAST OF KNOWSLEY INDUSTRIAL PARK

- East of KIP - Green Belt
- East of KIP - Highways
- East of KIP - Flora and fauna
- East of KIP - Impacts on adjacent areas

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
East of KIP - Green Belt	<p>No objection on basis of:</p> <ul style="list-style-type: none"> • Decision to remove the land from the Green Belt is appropriate in light of NPPF paragraph 83, which states that adequate consideration should be given to the long term permanence of green belt boundaries to ensure they are capable of enduring beyond the plan period. • National Grid contends that the land to the north of the A580, whilst not available for development at present is suitable for long term removal from the Green Belt. <p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • Absence of need for additional employment - abundance of empty premises and outlets built around School Lane (Knowsley 	<p>Comments on land supply issues and the general approach to Green Belt release are set out in chapters 9 and 10 above.</p> <p>The Council's statement (CH12C, Tables 12C.3 and 12C.4) to the hearings in July 2014 provides details of the total and risk assessed plan period employment land supply. The latter informs Table 5.1A (proposed modification M071) of the KLPCS, although with a subsequent change to the capacity of the Land at Knowsley Lane SUE. This identified that the release of Green Belt is necessary to ensure a deliverable employment supply is available to provide a range and choice of sites to address plan period needs up to 2028. This is notwithstanding existing land supply within Knowsley's existing business parks and industrial areas, such as Knowsley Industrial and Business Parks, which are expected to also contribute.</p> <p>The allocation of the SUE must ensure that any new Green Belt boundaries will need to be robust and defensible in line with national Green Belt policy to prevent further</p>

19 EAST OF KNOWSLEY INDUSTRIAL PARK

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>Business Park) lie empty.</p> <ul style="list-style-type: none"> • Taking land out of the Green Belt to have units standing empty seems stupid, when there are more than enough units and land on current industrial estates. Specific examples with regeneration benefits referred to: <ul style="list-style-type: none"> a) Alchemy site b) Old Kodak site. • Loss of character and identity of Knowsley Village. 	<p>encroachment into the remaining Green Belt. This necessitates the removal of the entire SUE from the Green Belt, notwithstanding the National Grid's ownership interests within the area of land north of the A580.</p>
East of KIP - Highways	<p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • Increased traffic where the level is high - direct lorries day and night to use Knowsley Lane to get to the Business Park. • Increased traffic congestion 	<p>Highway provision has been considered as part of the process of selecting the proposed SUEs. Following strategic studies (e.g. Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring that SUEs can be served by appropriate highway infrastructure. The evidence base (EB10) suggests that for this site potential mitigation measures should be focused on localised junction improvements and integration with the existing business park. Such measures must be assessed in greater detail and agreed with the developer at the planning application stage in accordance with Policies CS7 and CS27, alongside the SUE policies. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway</p>

19 EAST OF KNOWSLEY INDUSTRIAL PARK

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		works within the developer contributions process.
East of KIP - Flora and fauna	<p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • Impact upon wildlife - examples mentioned - birds, bats, stoats, badgers, pink footed geese. 	<p>Habitats for flora and fauna have been considered as part of the process of selecting the proposed Sues. The site contains no recognised designations (such as Local Wildlife Sites). Key biodiversity assets have been protected through the approach to the selection of appropriate SUE locations, and the identification of the developable areas within these locations. Any impacts on flora and fauna and their habitats will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS8 and CS19, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
East of KIP - Impacts on adjacent areas	<p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • A loss of privacy and outlook to adjacent properties. • Increased noise pollution. • Impact upon quality of life. • Devaluation of property. 	<p>These concerns are acknowledged. However, there is no evidence to suggest that appropriately designed new development would cause significant harm to the quality of life of existing residents to an extent which renders the KLPCS unsound. Impact on local property prices is not a soundness issue. The design of development will be subject to detailed requirements in the context of other Local Plan policy requirements relating to sustainable development and preventing an unacceptable level of impact upon surroundings when a planning application is submitted..</p>

20 KNOWSLEY LANE, HUYTON

20 KNOWSLEY LANE, HUYTON

- Knowsley Lane, Huyton – Green Belt Principles
- Knowsley Lane, Huyton – Proposed SUE boundaries
- Knowsley Lane, Huyton – Existing Uses
- Knowsley Lane, Huyton – Proposed Uses
- Knowsley Lane, Huyton – Proposed Mix of Uses
- Knowsley Lane, Huyton – Density of Proposed Development
- Knowsley Lane, Huyton – Master planning
- Knowsley Lane, Huyton – Highways
- Knowsley Lane, Huyton – Flora and Fauna
- Knowsley Lane, Huyton – Flooding
- Knowsley Lane, Huyton – Infrastructure
- Knowsley Lane, Huyton – Air Quality
- Knowsley Lane, Huyton – Impacts on Adjacent Areas

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Knowsley Lane, Huyton – Green Belt Principles	<p>The Council have failed to provide exceptional circumstances for the release of this site from the Green Belt and allocation as an SUE. There are concerns about the impact on the following aspects of Green Belt release:</p> <ul style="list-style-type: none"> • Development of the site would merge the town of Prescot with the town of Huyton; The land at Knowsley Lane is the first patch of green land after 8 miles from Liverpool City Centre • The site is part of the M57 Green Belt corridor 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p>

20 KNOWSLEY LANE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>designated as a strategic green link, which has various functions (Policy CS8)</p> <ul style="list-style-type: none"> • The site checks unrestricted sprawl • The site assists in safeguarding the countryside • The site provides a pleasant backdrop and enhances the lives of people living in the vicinity and those passing through • The site is a significant element in the character of Prescott • The land is highly valuable agricultural land • There is already sufficient development land, including brownfield land, in the area, hence there is no demand for Green Belt land to be released • The original arguments for the designation of Green Belt are still relevant and the majority of local people are not in favour of the removal of the land from the Green Belt. 	
<p>Knowsley Lane, Huyton – Proposed SUE boundaries</p>	<p>Suggest that the proposed SUE boundary be amended to omit the area of land to be retained for public open space (including outdoor sport)</p> <p>If there is to be development, the trees, habitat and environment should be protected.</p>	<p>The Technical Report: Sustainable Urban Extension (TR07) is clear that the developable area is restricted to areas outside outdoor sporting provision and associated woodland west of George Hale Avenue. National policy requires any new Green Belt boundaries to be robust and defensible to prevent further encroachment into the remaining Green Belt. The protection of identified outdoor sporting provision is provided for by a pre-existing Urban Greenspace allocation which is not sought to be altered. In addition, matters such as tree, habitat and environment protection are provided by</p>

20 KNOWSLEY LANE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		other policies in the KLPCS.
Knowsley Lane, Huyton – Existing Uses	<p>The existing uses of the Knowsley Lane site are valuable and should be maintained, due to:</p> <ul style="list-style-type: none"> • The site supports farm use, animals and the livelihood of the farmer • There are a range of community uses including for leisure, amenity, play, outdoor sport, football, dog walkers, equestrian uses. The loss of these uses could impact negatively on health and wellbeing. • The important role of greenspace in the character of the area, which is semi rural and in some parts, very rural and remote • The site is an inherent part of Prescott and its surroundings, and affords most welcome and aesthetically pleasing views; they are important, rare and attractive oases of green space, fresh air and relative beauty. • The land is a carbon sink • The land offers peace and relaxing views 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p>
Knowsley Lane, Huyton – Proposed Uses	<p>The need for new development in this area was questioned, due to:</p> <ul style="list-style-type: none"> • There is plenty of disused land which would be far more suitable than the Green Belt land which has been in the area for over 200 years • There is no need for any more housing in the 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan</p>

20 KNOWSLEY LANE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>area, due to recent vacant developments e.g. Knowsley Lane and Hillside</p> <ul style="list-style-type: none"> • A lack of clarity about how demand for additional housing has been evaluated • There is no demand that people want to move to the area • The delivery of more market housing would help to deliver regeneration in North Huyton and Stockbridge Village, as acknowledged by the Council • There are lots of plots of land in the area that could be used for residential development • There are office units standing empty, e.g. King's Business Park • Any additional retail facilities may have an economic boost for the area but will have a detrimental impacts on small local businesses • Potential for planning applications for fracking • Suggest investment should be in a leisure park similar to Victoria Park in Halton, which increased footfall in Widnes and local spending, gives people ability to exercise and will give children something to do, alongside health benefits 	<p>preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Issues relating to housing, employment and retail are dealt with separately in Chapters 6 - 9 and 11.</p>
Knowsley Lane, Huyton – Proposed Mix of Uses	Support for the principle of releasing the land at Knowsley Lane from the Green Belt for development, but the site should be allocated for a reduced area of employment development and a greater area of residential development, or a	This issue does not raise any new soundness issues. The proposed minimum of 16 hectares for business uses or other appropriate LCR key economic sectors is considered appropriate due to the quantitative and qualitative requirements, together with the land supply calculations

20 KNOWSLEY LANE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>more flexible allocation. The site is capable of accommodating significantly more than 94 dwellings. There is more market interest for residential development has been demonstrated than for employment uses</p>	<p>presented as part of the reconvened hearings (see Table 12C.1, Appendix 1, Statement 12C). The Joint Employment Land and Premises Study (paragraph 12.42, EB07) suggests allocation of a high quality business park of up to 19 hectares.</p>
<p>Knowsley Lane, Huyton – Density of Proposed Development</p>	<p>There should be higher density than 30 dwellings per hectare. A denser line of dwellings could be delivered along the northern boundary in order to minimise the potential impacts of noise from the M57. Concern that the Plan might unnecessarily and unjustifiably constrain the scope of any residential development, and should be amended to reflect that it would be appropriate for a residential development of considerably more than 94 residential units – potential 225 units.</p>	<p>The assumed density of 30 dpa allows for appropriate master planning and resultant landscaping to minimise adverse impacts upon surrounding properties and differentiate between housing and employment development, whilst providing a buffer to the M57 motorway to the north. The figure of approximately 100 dwellings is a notional capacity that does not preclude a degree of flexibility in the final layout of development if higher densities are justified in delivering an appropriate housing mix, provided at least 16 hectares is retained for employment development.</p>
<p>Knowsley Lane, Huyton - Master planning</p>	<p>The approach to Knowsley Lane master planning is not legally compliant or sound as it does not rest on a credible evidence base. Specifics of alternative proposal include:</p> <ul style="list-style-type: none"> • Persimmon Homes has commissioned a masterplan for the SUE site, which would help inform the preparation of an SPD and to establish the development capacity of the site. This is supported by a range of technical studies (attached – includes masterplan diagram, Technical Summary Note, Noise Assessment, Highways Assessment, 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Any master plan that is prepared would need to be policy compliant and retain the minimum 16 hectares of</p>

20 KNOWSLEY LANE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>Extended Phase 1 Habitats Survey)</p> <ul style="list-style-type: none"> • The master plan will consider that the brook running across the site is a logical boundary between residential and employment developments • Separate access points for residential and employment uses should be used, with site pedestrian connections proposed • A strong barrier of development, fronting the M57 should be incorporated, to help minimise the impacts of traffic noise • Concerns that Council SPD work is not being informed by technical studies, the work fails to take account of key features such as the brook, it relies on providing an unnecessary access point, and the work is being undertaken prematurely (i.e. in advance of adoption of the Local Plan). • Master planning exercise, informed by a range of technical studies and evidence, should be used to assist in the formulation of the Local Plan allocation. • The Plan should acknowledge that the precise quantum of residential development should be informed by principles of any SPD / master planning • The allocation profile should be based on a range of technical studies for the site to ensure an evidence-based approach to place making 	<p>employment development required by Policy SUE2a clause 1(b).</p> <p>The proposed minimum of 16 hectares for business uses or other appropriate LCR key economic sectors is appropriate due to the quantitative and qualitative requirements, together with the land supply calculations presented as part of the reconvened hearings (see Table 12C.1, Appendix 1, Statement 12C). The Joint Employment Land and Premises Study (paragraph 12.42, EB07) suggests allocation of a high quality business park of up 19 hectares.</p> <p>Policy SUE 2(a) proposes that the Council will prepare its own Supplementary Planning Document to support delivery of the SUE. This will be informed by initial technical evidence where necessary and appropriate.</p>
Knowsley	Concerns about the impacts of the proposed	Highway provision has been considered as part of all the

20 KNOWSLEY LANE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Lane, Huyton – Highways	<p>development at Knowsley Lane on highways in the area, because:</p> <ul style="list-style-type: none"> • At present the traffic flows well. The development of the site, in close proximity to other sites, will create traffic problems. • Knowsley Lane is extremely busy and dangerous with traffic during the day; proposals will increase traffic levels • Knowsley Lane was made and used as a country lane, it was never intended to take the volume of traffic that is already using it • Knowsley Lane is too dangerous to have new roads passing extra vehicles on to it. • Traffic restrictions in place on Knowsley Lane could not feasibly be lowered for a road as heavily used as it is, increasing danger for local residents • The Liverpool Road roundabout it also dangerous and congested, there is often a tailback of vehicles • Suggest that Policy SUE2a includes reference to “measures to ensure the safe and efficient operation of the strategic road network at M57 Junction 2” • Further traffic surveys should be carried out on Knowsley Lane • 95 new homes will potentially increase traffic by 180+ vehicles, employment site will have a large impact 	<p>proposed SUEs. Following strategic studies (e.g. studies available as Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring that SUEs can be served by appropriate highway infrastructure. For some sites, on or off site highway works will be necessary, but it is considered that these are best assessed and agreed with the developer at the planning application stage in accordance with Policies CS7 and CS27, alongside the SUE policies. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway works within the developer contributions process.</p>

20 KNOWSLEY LANE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Residents have undertaken a brief survey of traffic on Knowsley Lane • Children who currently play on the land will have to play on the roads, causing an unsafe environment • The development poses a highway safety risk • Development of the site will increase traffic past other accesses nearby • Congestion and pollution will be diabolical for all residents directly on/off Knowsley lane, with difficulty accessing the M57 • The development will bring road traffic accidents • There is likely to be a relatively low increase in traffic as part of any mixed use development, due to the high background traffic movements. 	
Knowsley Lane, Huyton – Flora and Fauna	<p>Site is home to a variety of resident fauna, including the following species, some of which are at risk: lapwing, skylark, bats, rabbits, foxes, swifts, squirrels, hedgehogs, crested newts, common bird species, field mice, breeding pairs of raptors including buzzards and kestrels, rare insect types including brimstone butterflies, hummingbird hawk moths and small tortoiseshell butterflies, roosting bats (a protected species). Animals on the site will be left to starve as the food chain will be affected.</p> <p>Development will see the destruction of sites used</p>	<p>Habitats for flora and fauna have been considered as part of all of the proposed SUEs. This site is not a Local Wildlife Site. Key biodiversity assets have been protected through the approach to the selection of appropriate SUE locations, and the identification of the developable areas within these locations. Any impacts on flora and fauna and their habitats will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS8 and CS19, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>

20 KNOWSLEY LANE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>by migratory birds i.e. Canada Geese, Oyster Catchers and Pink Footed Geese</p> <p>The site contains woodland leading to Knowsley Hall along George Hale Avenue consisting mostly of native species of trees and is several hundred years old. There is a need for more trees to supply oxygen and clean air. Hedges provide an environment for birds. Loss of trees will affect visual amenity.</p> <p>Unless appropriate mitigation measures were implemented, development could lead to the loss of priority habitat and mature trees</p> <ul style="list-style-type: none"> • Detailed environmental impact assessment is required 	
Knowsley Lane, Huyton - Flooding	<p>Concern about the impacts of development of the Knowsley Lane site on flooding in the area, including:</p> <ul style="list-style-type: none"> • Loss of trees and natural water courses on the site, with the addition of hard surfaces, will see a rise in flooding in the area, including pressure on inadequate drainage systems • The defined site is traversed by stream and probably farm ditches • Even if culverting is employed there could be danger from backing up • Building over the main water main might not 	<p>The extent of flood risk has been considered as part of all of the proposed SUEs. The Green Belt Study (Examination library reference EB08) outlines how flood risk issues have been considered in relation to the selection of Green Belt locations. The site is not identified as an area at risk of flooding within the Environmental Agency Flood Maps (November 2014). Any impacts relating to surface water drainage arising from any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS2, CS19 and CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>

20 KNOWSLEY LANE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>be sensible or accepted by United Utilities</p> <ul style="list-style-type: none"> If the new development is kept clear of the lowest flood endangered land, this would reduce the numbers of housing and maybe become non cost-effective 	
Knowsley Lane, Huyton – Infrastructure	An increase in population in the area will overstretch local resources leading to problems with school placements and GP cover.	Infrastructure provision has been considered as part of all the proposed SUEs. Following liaison with a range of infrastructure providers, there have been no significant issues identified in ensuring that SUEs can be served by appropriate infrastructure, including schools and doctors. For some sites, on or off site infrastructure improvements may be necessary as a result of development and these will be assessed at the planning application stage in accordance with Policy CS27, alongside the SUE policies.
Knowsley Lane, Huyton – Air Quality	Air quality will be affected by the increased volume in traffic and increase in CO2 from loss of greenery.	The Knowsley Monitoring Report 2014 (PP30) indicates that there are no Air Quality Management Areas (AQMAs) in Knowsley. Furthermore any potential impacts in terms of air quality arising from any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS2 and CS19, alongside the SUE policies. Appropriate mitigation, where necessary, will be identified through this process.
Knowsley Lane, Huyton – Impacts on Adjacent Areas	<p>The area around the development site will be subject to impacts, including:</p> <ul style="list-style-type: none"> Additional air, light and odour pollution, increase in traffic, congestion and noise 	These concerns are acknowledged. However, there is no evidence to suggest that appropriately designed new development would cause significant harm to the quality of life of existing residents to an extent which renders the KLPCS unsound. Furthermore the design of development

20 KNOWSLEY LANE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Disruption during construction to the local community e.g. road closures, noise, traffic, overlooking a building site, dirt and vermin • Loss of visual and practical amenity, privacy, views and access to open space for the local community • Concern that existing residential properties will end up in the midst of an industrial estate • Overall impacts on health, safety and wellbeing of the local community 	<p>will be subject to detailed requirements in the context of other Local Plan policy requirements relating to sustainable development and preventing impact upon surroundings when a planning application is submitted. Any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with policies in the KLPCS, including the SUE policies.</p>

21 EDENHURST AVENUE, HUYTON

21 EDENHURST AVENUE, HUYTON

- Edenhurst Avenue, Huyton - Green Belt Principles
- Edenhurst Avenue, Huyton - Proposed SUE boundaries
- Edenhurst Avenue, Huyton - Existing uses
- Edenhurst Avenue, Huyton - Proposed Uses
- Edenhurst Avenue, Huyton - Highways
- Edenhurst Avenue, Huyton - Flora and fauna
- Edenhurst Avenue, Huyton - Flooding
- Edenhurst Avenue, Huyton - Air quality
- Edenhurst Avenue, Huyton - Infrastructure
- Edenhurst Avenue, Huyton - Impacts on adjacent areas

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Edenhurst Avenue, Huyton – Green Belt Principles	<p>The Council have failed to provide exceptional circumstances for the release of this site from the Green Belt and allocation as an SUE. There are concerns about the impact on the following aspects of Green Belt release:</p> <ul style="list-style-type: none"> • Resident objections to development on the site were previously supported by the Council. Many of the grounds for refusal of previous planning applications on this site, not related to its Green Belt status still apply. • Council have failed to justify early release of the site based on the minimal impact this will have on delivering requirements of the Plan in meeting housing needs. 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Issues of alternative sites, land supply and the principles of Green Belt release are addressed separately in Chapters 6-9 and 11.</p>

21 EDENHURST AVENUE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Site is too small to accommodate sufficient numbers of houses to affect the plan. Site only accommodates less than 1% of estimated plan period housing requirements. The Plan can be made to work without the inclusion of the site. • Small Green Belt areas should not be released until other supply is exhausted. There is enough “brown belt” land to accommodate planning expansion. Council should research sites that would not carry such controversy. Alternative brownfield sites should be used e.g. old Bowing Park High School, Roby College on Rupert Road, Fire Stations in Prescot and Huyton, Roby Community Centre on Merton Crescent / Arnside Road • The land provides trees and greenspace that breaks up the areas of housing. The land provides separation between Liverpool and Knowsley/Huyton. Release of the site results in the erosion of any boundary between Liverpool and Knowsley • Council have failed to demonstrate why they have chosen to bring forward Edenhurst from the original review of 2028 • Development of the site is contrary to aims and objectives of greenspace strategy • The site should be considered windfall development within the Green Belt, which is 	

21 EDENHURST AVENUE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>not permitted except in exceptional circumstances</p> <ul style="list-style-type: none"> • Support proposed allocation of the site as a SUE for residential development, and the release of the site from the Green Belt on adoption of the Plan. 	
Edenhurst Avenue, Huyton – Proposed SUE boundaries	<p>The capacity of the site is based on development just within flood zone 1. As part of any planning application, a full Flood Risk Assessment would be carried out, and therefore it may be possible that the site would accommodate a greater number of dwellings. Support the lack of cap on the development capacity of the site. Initial assessments indicate that the developable area can be increased after mitigating flood risk.</p> <p>If development goes ahead, suggest that the Council take the opportunity should they need to redefine the boundary to retain a band of Green Belt land running the length of the boundary to ensure control is retained by the Council between the boundary of Liverpool and Knowsley.</p>	<p>The figure of 86 dwellings in the KLPCS Appendix E (Allocation profiles) is a notional capacity that does not preclude a degree of flexibility in the final layout of development if appropriately justified as part of a future application. It has however been informed by evidence in the Technical Report: Sustainable Urban Extensions (TR07) which includes consideration of flood risk.</p> <p>The extent of the SUE was defined in its current form as Government policy requires that any new Green Belt boundaries must be robust and likely to be permanent. However this does not preclude the potential for development layouts (if necessary) to incorporate areas on the periphery of the site where no residential development is proposed.</p>
Edenhurst Avenue, Huyton – Existing Uses	<p>The existing uses of the Knowsley Lane are valuable and should be maintained, due to:</p> <ul style="list-style-type: none"> • There is precious little greenspace left 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust</p>

21 EDENHURST AVENUE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • The site provides a barrier to the noise from the M62 and a valuable lung for the area • Site connects an important green corridor • Council Greenspace strategy supports arguments for green and open spaces • A tree preservation order is in place to protect the poplar trees – any proposed building will likely cause damage • Council has not updated its Open Space, Recreation and Sports Needs Assessment for 10 years, and should undertake an updated needs assessment to establish if there is a need for Edenhurst to remain as a recreational facility <p>Existing and past uses or activities on the site have caused issues, including:</p> <ul style="list-style-type: none"> • The site is not well managed or supervised. Previous sports pavilion and club burnt down • Recently the Council and police have fenced off the site and cut off a public right of way • There has previously been illegal tree felling on the site • The site cannot have been inspected, as it is necessary to experience on site inspection, and survey / inspection of trees, vegetation and animal life • It is impossible to gain access to the Edenhurst site, so it cannot have been 	<p>evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>The status of greenspace and outdoor sports provision has been considered in the context of evidence within the Knowsley Greenspace Audit (EB21) and Knowsley Playing Pitch Assessment and Strategy (EB22) published in 2012. These documents indicate that the site is surplus to requirements to meet local standards in terms of public open space and outdoor sports provision.</p> <p>Any impacts relating to noise, trees and public rights of way arising from any future proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with policies in the KLPCS, alongside the SUE policies. Appropriate mitigation, where necessary, will be identified through this process.</p>

21 EDENHURST AVENUE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	inspected	
Edenhurst Avenue, Huyton – Proposed Uses	<p>The need for new development in this area was questioned, due to:</p> <ul style="list-style-type: none"> • There is no demand for housing in the area. This will result in a large proportion of housing remaining vacant. • The Council is still short of land for sports facilities • There is no demand for a change of use other than by the owner and developer • There is no evidence that the planning application to be made by a prospective developer includes plans for the portion of the site not suitable for residential buildings that will bring benefits to the local community • The site is not deliverable by the developer • Site has historically been used for agricultural use, and should the land not be used for its current designation, it should be used for agriculture in keeping with the use of the adjacent land • Accuse the Council of working with developers to secure the site, in order to benefit the speculators / developers interests – this is to the detriment of local people and is challenged • Proposed change of use from Urban Greenspace and Educational Land requires 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Evidence suggests there is no current deficit of outdoor sports provision in Huyton Community Area, within which the Edenhurst Avenue, Huyton SUE is located. The Council's Monitoring Report (PP30, MI 86, pg.92) confirms this with respect to the local standards progressed in the supporting text of policy CS21.</p> <p>The detailed design and layout of any future proposal will be assessed with appropriate assessments (where necessary) as part of planning applications for new development, in accordance with policies in the KLPCS, alongside the SUE policies.</p> <p>Issues relating to alternative sites, land supply and the principles of Green Belt release are addressed separately in Chapters 6-9 and 11 of this document.</p>

21 EDENHURST AVENUE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>planning consent. All Bowring Park residents should be consulted</p> <p>The detail of the potential development of the site was questioned including:</p> <ul style="list-style-type: none"> • The Council have not given any information on how the site would look • There is no need for greenspace on the edge of the site, as there is already sufficient greenspace in the area; this will bring anti-social behaviour, be used as a cut-through and create an unsafe environment • Houses should be built in a similar style to existing properties to reflect the local area • Previous proposals have involved a mix of residential development and enhanced and new sporting and recreation facilities • The land could become available to travellers 	
Edenhurst Avenue, Huyton - Highways	<p>Concerns about the impacts of the proposed development at Edenhurst Avenue on highways in the area, because:</p> <ul style="list-style-type: none"> • Congestion on the B1578 is daily at all times of the day • School already creates significant traffic and parking issues along Edenhurst Avenue and Gladstone Avenue 	<p>Highway provision has been considered as part of all the proposed SUEs. Following strategic studies (e.g. studies available as Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring that SUEs can be served by appropriate highway infrastructure. For some sites, on or off site highway works will be necessary, but it is considered that these are best assessed and agreed with the developer at the planning</p>

21 EDENHURST AVENUE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Similar developments around the site have saturated the local highway network making the site undeliverable as a reserve housing location • Access roads are not of a standard to support increased traffic on to what is already a busy road – Roby Road / Bowring Park Road • Due diligence has not been complied with in consideration of the increase in traffic on the A5080, including the junction of Rimmer Avenue and A5080, which has been the location for a number of fatal accidents. Additional traffic concerns are Bowring Park Avenue, Rimmer Avenue, Gladstone Avenue, Edenhurst Avenue • Any change of use will further congest an area plagued by highway and access constraint • Highway and access constraints make it an inappropriate development • There may be increased risk of accidents <p>Potential configuration of highways was raised as an issue, including:</p> <ul style="list-style-type: none"> • Local people have been prevented from accessing bus stop on Childwall Valley Road and Post Office on foot • Presently the homes and roads around Edenhurst Avenue cannot be accessed by 	<p>application stage in accordance with Policies CS7 and CS27, alongside the SUE policies. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway works within the developer contributions process.</p> <p>In accordance with the findings of the Transport Feasibility Study, access to the site remains feasible from a highway perspective from both Edenhurst Avenue and Sarum Road without causing capacity issues, but may require improvements to the junctions at Roby Road and Childwall Valley Road respectively. The existing segregated access arrangements for the Bowring Park and Belle Vale areas are acknowledged. The design of any scheme will therefore be expected to carefully consider, prevent and / or appropriately mitigate the potential for additional traffic movements that could otherwise arise through the opening of a link between Roby Road and Childwall Valley Road.</p>

21 EDENHURST AVENUE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>vehicles from Childwall Valley Road</p> <ul style="list-style-type: none"> • If the land becomes accessible by road, the Bowring Park area would run the risk of being used as a short cut to Huyton or the M62 • Council should consider how the remaining land could be used while leaving the current access (no through road) • Concern about the potential new links from Edenhurst Avenue to Sarum Road and Childwall Valley Road 	
Edenhurst Avenue, Huyton - Flora and fauna	<p>Site is home to a variety of resident flora and fauna including small mammals, bats, fox, badgers, 35 varieties of birds including greenfinches, goldfinches, blue and coal tits, long-tail tits and jays, blackbirds and wrens, wildflowers and protected trees. The site also once contained an ancient circle of holly bushes and has considerable historical significance.</p> <p>Development will disconnect Green Belt between Bowring Park Golf Course and Farmland with Court Hey Park, which provide habitats.</p>	<p>Habitats for flora and fauna have been considered as part of all of the proposed SUEs. This site is not designated as a Local Wildlife Site. Key biodiversity assets have been protected through the approach to the selection of appropriate SUE locations, and the identification of the developable areas within these locations. Any impacts on flora and fauna and their habitats will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS8 and CS19, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
Edenhurst Avenue, Huyton - Flooding	<p>One quarter to one third of the land is designated as flood plain and there is flood zone which needs to be maintained. This brings issues including:</p>	<p>The extent of flood risk has been considered as part of all of the proposed SUEs. The Green Belt Study (Examination library reference EB08) outlines how flood risk issues have been considered in relation to the selection of Green Belt</p>

21 EDENHURST AVENUE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Flood risk mitigation works could cost thousands of taxpayers money to correct before building • Site is on a water table, with danger of possible subsidence • If houses are built, the area identified as flood zone should not be opened up, so to prevent increased crime and antisocial behaviour 	<p>locations. Within the Strategic Flood Risk Assessment (Level 2) (Examination library reference EB15), areas of the site have been identified as being within Flood Zone 2 (51% - 3.5 ha) including a smaller area of Flood Zone 3a (46% - 3.1 ha) which influences a reduced notional capacity in KLPCS Appendix E. The findings of the SFRA (Level 2) have been accepted by the Environment Agency. A more detailed site-specific Flood Risk Assessment will be required for the site prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
Edenhurst Avenue, Huyton - Air quality	<p>Pollution from traffic is already high. The site currently decontaminates the pollution residents suffer due to railway, M62, B5080 and the B5178, and muffles noise pollution. Any development will further increase the carbon footprint of the area due to the need to use cars. This could cause health issues.</p>	<p>The Knowsley Monitoring Report 2014 (PP30) indicates that there are no Air Quality Management Areas (AQMAs) in Knowsley. Through the identification of the SUEs, there have been no issues raised in terms of a particular risk to air quality as a result of new development. The potential for impacts on air quality arising from development will be assessed as part of planning applications, in accordance with Policy CS2, alongside the SUE policies.</p>
Edenhurst Avenue, Huyton - Infrastructure	<p>There are existing issues regarding infrastructure in the area, including:</p> <ul style="list-style-type: none"> • Local primary school outside of the Borough in Liverpool is already oversubscribed • St. Paschal Baylon school is under 	<p>Infrastructure provision has been considered as part of all the proposed SUEs. Following liaison with a range of infrastructure providers, there have been no significant issues identified in ensuring that SUEs can be served by appropriate infrastructure, including schools and doctors. For some sites, on or off site infrastructure improvements may be necessary</p>

21 EDENHURST AVENUE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>consultation to increase capacity, but this is to serve existing residential developments that have taken place in Liverpool</p> <ul style="list-style-type: none"> • The nearest primary school within the Borough is 1.7 miles away and has no public transport means to and from it. • It is currently difficult to get a doctors appointment • There is little retail provision in the area • The Council has no facilities in the region of Roby to service residents, who rely on services in Liverpool <p>The potential development of the site could exacerbate these issues, including:</p> <ul style="list-style-type: none"> • Local doctors currently accepting some new patients but will be stretched on its current resources. • More houses will stretch local services, such as health clinics, schools, etc. and which mostly will be in the adjacent borough. • Proposal would severely strain existing infrastructure of few unsustainable shops on Rimmer Avenue • Question whether the Council have sought the consultation of local services that would be drained by development on the site 	<p>as a result of development and these will be assessed at the planning application stage in accordance with Policy CS27, alongside the SUE policies.</p> <p>In terms of current retail and service provision, the Rimmer Road local centre is within 750m of the site, with additional facilities also accessible within neighbouring areas of Liverpool which adjoins the site.</p>
Edenhurst Avenue, Huyton	The area around the development site will be subject to impacts, including:	These concerns are acknowledged. However, there is no evidence to suggest that appropriately designed new

21 EDENHURST AVENUE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
<p>- Impacts on adjacent areas</p>	<ul style="list-style-type: none"> • Increased traffic would create significant disruption for residents, particularly during construction • Surroundings will not improve due to increased noise and traffic flow • Visual impact would be detrimental to existing dwellers • Development would destabilise the current estate village design • The proposal would impact on the view to Runcorn • Development will add little to the sustainability of the wider areas as it does not sustain any community or social facilities or new infrastructure • Increasing residential capacity within the estate could result in declining property values and a loss of quality of life • Residents should be compensated as house prices will be affected and potentially see a decrease in value especially during construction • There is a need for clarification about the benefits to the local community that development will bring • Main drivers and benefactors would be the developer and the current landowner, at the detriment of Bowring Park and its residents 	<p>development would cause significant harm to the quality of life of existing residents to an extent which renders the KLPCS unsound. Furthermore the design of development will be subject to detailed requirements in the context of other Local Plan policy requirements relating to sustainable development and preventing impact upon surroundings when a planning application is submitted. Any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with policies in the KLPCS, including the SUE policies.</p>

21 EDENHURST AVENUE, HUYTON

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none">• It has not been proved that proposals would be positive for the local community and area	

22 LAND BOUNDED BY A58 PRESCOT

22 LAND BOUNDED BY A58 PRESCOT

- Land Bounded by A58 Prescott - Green Belt
- Land Bounded by A58 Prescott - Proposed SUE boundaries
- Land Bounded by A58 Prescott - Existing uses
- Land Bounded by A58 Prescott - Proposed Uses
- Land Bounded by A58 Prescott - Highways
- Land Bounded by A58 Prescott - Flora and fauna
- Land Bounded by A58 Prescott - Flooding
- Land Bounded by A58 Prescott - Air quality
- Land Bounded by A58 Prescott - Infrastructure
- Land Bounded by A58 Prescott - Impacts on adjacent areas

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Land Bounded by A58 Prescott - Green Belt	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • The process by which the sites have been chosen is flawed (reference made to Inspector comments in November 2013) • Part of the M57 strategic corridor / green link - once set these areas should be permanent. • Long established Green Belt boundary (1980s) in the area that should not be altered - development of offices resisted in 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>The proposal is to allocate the land as a Sustainable Urban</p>

22 LAND BOUNDED BY A58 PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>1980s, same principles still apply.</p> <ul style="list-style-type: none"> • Absence of justification / exceptional circumstances for the selection of the site, when there are already a number of brownfield sites available in the locality, including empty business, office and light industrial units (alternative sites listed under Policy CS3 supply). • Site conforms to at least four of the five purposes of including land within the Green Belt in the National Planning Policy Framework. • Merging of towns and narrowing the gap between settlements - the site is an essential buffer between Prescott and Huyton - loss is contrary to National Planning Policy Framework and Town and Country Planning regulations. • The site checks unrestricted sprawl, merging of towns and assist in safeguarding the countryside in accordance with the National Planning Policy Framework. • These swathes of green provide a pleasant backdrop, enhance the lives of people living in the local vicinity and to those passing through, and are a significant element in the historic character of Prescott – gateway location. • Piecemeal erosion of Prescott is unacceptable. 	<p>Extension in accordance with Policy SUE1 with the proposed primary use as residential. Alternative uses of the land such as fracking are not proposed as part of this site allocation.</p>

22 LAND BOUNDED BY A58 PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Loss of this Green Belt land to development would be highly detrimental to Prescott on an ecological, social and environmental basis. • Approach is unsound as the plan to remove the greenbelt status is unsound as it does not restrict development in such areas (refers to NPPF paragraph 14). • Commercial preferences are not exceptional circumstances (refers to NPPF paragraph 17). • The wording of PM09, 42, Policy CS3, Clause 1 by the inspector that release of greenbelt land 'is required to meet the need for new housing over the plan period' and '3. On current evidence, this requires some land to be brought forward from sites in the Green Belt earlier than anticipated in the Submission CS' echoes language used earlier in relation to Reigate, language that Nick Boles was so 'disturbed' by - at the public meeting of 24th October, as interpreted by the attendees, the Council representatives confirmed that their hand had been forced by the inspector. • Surely the extent of development could be limited to the currently developed area, presuming that the owners of the garden centre are intending to sell to a developer. • Potential to encourage applications for fracking. 	

22 LAND BOUNDED BY A58 PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Land Bounded by A58 Prescott - Proposed SUE boundaries	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • The site currently contains playing fields used by the local Centre for Learning and local community - there is no other land that could be used as a practical alternative – these playing fields should be retained within the Green Belt. • SUE site boundary includes playing fields and therefore is allocated for residential use – despite the Green Belt Technical Report excluding the site from developable area in capacity calculations. • Approach of including the playing fields in the SUE boundary conflicts with policy CS8 – inclusion creates ambiguity and weakens the intention to protect existing areas for sport. • Loss of the site would result in a loss of the identifiable town boundary of Prescott - would result in a loss of local identity. • The boundary of the SUE should exclude the outdoor sports provision. 	<p>The Technical Report: Sustainable Urban Extension (TR07) is clear that the developable area is restricted to areas outside outdoor sporting provision. The allocation of the SUE must ensure that any new Green Belt boundaries will need to be robust and defensible in line with national Green Belt policy to prevent further encroachment into the remaining Green Belt. This is the reason why the KLPCS proposed the removal of the entire SUE from the Green Belt. Nevertheless the protection of identified outdoor sporting provision is assured via a proposed Urban Greenspace allocation for the section of the SUE that is currently used for outdoor sporting provision.</p>
Land Bounded by A58 Prescott - Existing uses	<p>The plan is unsound and not legally compliant because of:</p>	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt</p>

22 LAND BOUNDED BY A58 PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Loss of equestrian business. • Loss of agricultural land - site supports farm animals and the livelihood of a farmer. • Impact upon food production. • Loss of greenspace / “green lungs” - Prescott is an area which is deficient in greenspace. • Part of the site is currently within a Conservation Area and should not be changed. • Loss of employment – the garden centre provides employment for twenty five people. 	<p>(TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council’s approach to be sound (Examination library reference EX26 and EX34).</p> <p>The protection of identified outdoor sporting provision is provided for through a pre-existing Urban Greenspace allocation outside of the developable area that is not sought to be altered</p> <p>Any impacts arising from the detail of a proposed development such as loss of employment and impact upon the adjoining Prescott Town Centre Conservation Area will be assessed through appropriate assessments as part of planning applications for new development, in accordance with policies in the KLPCS, alongside the SUE policies. These constraints may influence the design and layout of a proposal, but there is no reason to suggest that they would preclude delivery of development within the SUE.</p>
Land Bounded by A58 Prescott – Proposed Uses	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Development of the site would conflict with NPPF paragraphs 109, 110 and 114. 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council’s approach to</p>

22 LAND BOUNDED BY A58 PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		be sound (Examination library reference EX26 and EX34).
Land Bounded by A58 Prescott - Highways	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Three developments (with Knowsley Lane and Carr Lane SUEs) in close proximity will create traffic problems through increased volume. • Only two roads that currently access this area (Knowsley Park Lane and Stanley Crescent) which would not sustain a development of the scale intended due to existing congestion. Is a new access road planned? • Congestion levels on nearby Derby Road, Park Road and Egerton Road. • Access to the site is impossible from the A58 (reference to KMBC DRN technical report dated 20th July 2008) in the interest of highway safety and movement. • Access to the site from Knowsley Park Lane and / or Liverpool Road would add to traffic chaos - school traffic and very busy A57 leading to Prescott Town Centre. 	<p>Highway provision has been considered as part of all the proposed SUEs. Following strategic studies (e.g. studies available as Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring that SUEs can be served by appropriate highway infrastructure. For some sites, on or off site highway works will be necessary, but it is considered that these are best assessed and agreed with the developer at the planning application stage in accordance with Policies CS7 and CS27, alongside the SUE policies. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway works within the developer contributions process.</p>
Land Bounded by A58 Prescott - Flora and fauna	<p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • Impact upon wildlife - species on the at risk 	<p>Habitats for flora and fauna have been considered as part of all of the proposed SUEs. Key biodiversity assets have been protected through the approach to the selection of appropriate SUE locations, and the identification of the developable areas</p>

22 LAND BOUNDED BY A58 PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>register, e.g. lapwing, skylark, buzzards, sparrow hawk, kestrels, migratory birds, bats, hedgehogs, small mammals, crested newts and invertebrates.</p> <ul style="list-style-type: none"> • Habitat surveys are vital - valuable wildlife area. • Loss of woodland and wetland areas. 	<p>within these locations. Any impacts on flora and fauna and their habitats will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS8 and CS19, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
<p>Land Bounded by A58 Prescott - Flooding</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • The site is prone to flooding - Prescott Brook runs through the site. • Avoiding flood risk areas would reduce housing numbers potentially to the point of becoming non cost-effective. 	<p>The extent of flood risk has been considered as part of all of the proposed SUEs. The Green Belt Study (Examination library reference EB08) outlines how flood risk issues have been considered in relation to the selection of Green Belt locations. According to the Environmental Agency Flood Maps (November 2014) the site has a limited area of flood risk (i.e. Flood Zone 2 and Flood Zone 3) adjacent to Prescott Brook. However at a total area of 0.4 hectares this is not extensive and there is no reason to suggest that they would preclude delivery of development within the SUE. A more detailed site-specific Flood Risk Assessment will be required for the site prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p> <p>Any impacts relating to surface water drainage arising from any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS2, CS19 and CS24, alongside the SUE policies. Appropriate mitigation</p>

22 LAND BOUNDED BY A58 PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		works, where necessary, will be identified through this process.
Land Bounded by A58 Prescott - Air quality	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> Air quality will be affected by increased volume of traffic and increased CO2 through loss of greenery. 	The Knowsley Monitoring Report 2014 (PP30) indicates that there are no Air Quality Management Areas (AQMAs) in Knowsley. Through the identification of the SUEs, there have been no issues raised in terms of a particular risk to air quality as a result of new development. The potential for impacts on air quality arising from development will be assessed as part of planning applications, in accordance with Policy CS2, alongside the SUE policies.
Land Bounded by A58 Prescott - Infrastructure	<p>Agree with the modification to change the northern section from Green Belt to Urban Greenspace and educational land as long as this does not mean high rise school buildings overshadowing the adjacent housing.</p> <p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> The three sites (with Knowsley Lane and Carr Lane SUEs) will require extra medical centres, provision for additional school places - no apparent land reserved for any additional primary schools or infrastructure projects. Lack of detail on the accurate infrastructure in terms of roads, traffic congestion, health and safety, schools, public transport and GP 	Infrastructure provision has been considered as part of all the proposed SUEs. Following liaison with a range of infrastructure providers, there have been no significant issues identified in ensuring that SUEs can be delivered and served by appropriate infrastructure, including schools and doctors. For some sites, on or off site infrastructure improvements may be necessary as a result of development and these will be assessed at the planning application stage in accordance with Policy CS27, alongside the SUE policies.

22 LAND BOUNDED BY A58 PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>services.</p> <ul style="list-style-type: none"> • Inadequate local infrastructure and service provision to support development - shopping facilities, libraries, parks, education, Prescott GPs are full, recent loss of leisure centre and swimming baths in Prescott, pressure on hospital services. • Five huge pipes (water mains) from Prescott reservoir that serve Liverpool run under and directly across the site. 	
<p>Land Bounded by A58 Prescott - Impacts on adjacent areas</p>	<p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • Increased noise and light pollution. • Issue of policing is not considered / addressed - potential for increased crime and unrest. • Harm to the health and wellbeing, and quality of life of local residents. • Overcrowding. • Health and safety issues. • Topography and levels unsuitable for development - lacking light and views. • Loss of views and vistas of Prescott. • Devaluation of properties. 	<p>These concerns are acknowledged. However, there is no evidence to suggest that appropriately designed new development would cause significant harm to the quality of life of existing residents to an extent which renders the KLPCS unsound. Furthermore the design of development will be subject to detailed requirements in the context of other Local Plan policy requirements relating to sustainable development and preventing impact upon surroundings when a planning application is submitted. Any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with policies in the KLPCS, including the SUE policies.</p>

23 CARR LANE, PRESCOT

23 CARR LANE, PRESCOT

- Carr Lane, Prescott – Green Belt Principles
- Carr Lane, Prescott – Existing Uses
- Carr Lane, Prescott – Proposed Uses
- Carr Lane, Prescott – Highways
- Carr Lane, Prescott – Flora and Fauna
- Carr Lane, Prescott – Flooding
- Carr Lane, Prescott – Infrastructure
- Carr Lane, Prescott – Air Quality
- Carr Lane, Prescott – Impacts on Adjacent Areas

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Carr Lane, Prescott – Green Belt Principles	<p>The Council have failed to provide exceptional circumstances for the release of this site from the Green Belt and allocation as an SUE. There are concerns about the impact on the following aspects of Green Belt release:</p> <ul style="list-style-type: none"> • The release of the site is contrary to the purposes of including land in the Green Belt • There is already sufficient development land, including brownfield land, in the area, hence there is no demand for Green Belt land to be released • The site selection process is flawed, as pointed out by the Inspector in November 2013 • The development of the site would involve the 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p>

23 CARR LANE, PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>loss of good quality farmland</p> <ul style="list-style-type: none"> • The site is part of the M57 Green Belt corridor, designated as a strategic green link and is an essential buffer between Prescott and Huyton – any development will erode this gap. • The site checks unrestricted sprawl • The site assists in safeguarding the countryside • The site is a significant element in the character of Prescott • Development of the site is contrary to the aims of the Sustainable Community Strategy and the aim to deliver “The Borough of choice” 	
Carr Lane, Prescott – Existing Uses	<p>The existing uses of the site are valuable and should be maintained, due to:</p> <ul style="list-style-type: none"> • The site offers an oasis of greenspace between towns • The site is used as recreational greenspace • The green areas provide a pleasant backdrop for local residents and visitors • The area is in deficit for greenspace, which can have health benefits • The site is an inherent part of Prescott and affords most welcome and aesthetically pleasing views • The site is an important, rare and attractive oasis of greenspace, fresh air and beauty 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council’s approach to be sound (Examination library reference EX26 and EX34).</p> <p>Any impacts arising from the detail of a proposed development such as interaction with the adjacent Local Wildlife Site will be assessed through appropriate assessments as part of planning applications for new development, in accordance with policies in the KLPCS,</p>

23 CARR LANE, PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> The site has high wildlife and historic value (Victorian tip) on old sewage works and mine workings 	<p>alongside the SUE policies. Such constraints may influence the design and layout of a proposal, but there is no reason to suggest that they would preclude delivery of development within the SUE.</p> <p>The Carr Lane SUE is not publicly accessible and does not offer any current recreational or greenspace value.</p>
Carr Lane, Prescott – Proposed Uses	<p>The need for new development in this area was questioned, due to:</p> <ul style="list-style-type: none"> At earlier stages, there was no mention of housing at Carr Lane, which was identified for employment uses It is premature to develop the site until there is certainty about what will happen to South Prescott Planning Action Area A decision should be delayed to combine the site with the strategy for South Prescott action area The site should become part of the wildlife site on the north side of Prescott Brook. Site should be given the status of safeguarded land 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council’s approach to be sound (Examination library reference EX26 and EX34).</p> <p>The Inspector’s Interim Findings (EX26, paragraph 11) suggested that the proposed primary uses at KLPCS paragraph 5.50 were sound apart from Carr Lane, Prescott (which had flexibility for both housing / employment) because the adjacent land is likely to be developed for housing and therefore the primary use of this location should be solely housing. This informed the Council’s proposed modifications (M093, M157 and M168).</p>
Carr Lane, Prescott -	Concerns about the impacts of the proposed development at Carr Lane on highways in the	Highway provision has been considered as part of all the proposed SUEs. Following strategic studies (e.g. studies

23 CARR LANE, PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Highways	<p>area, because:</p> <ul style="list-style-type: none"> • Areas immediately adjacent would be compromised by increase in traffic and congestion • Carr lane is already a busy road and additional dwellings will provide further congestion 	<p>available as Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring that SUEs can be served by appropriate highway infrastructure. For some sites, on or off site highway works will be necessary, but it is considered that these are best assessed and agreed with the developer at the planning application stage in accordance with Policies CS7 and CS27, alongside the SUE policies. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway works within the developer contributions process.</p>
Carr Lane, Prescott – Flora and Fauna	<p>Site is home to a variety of flora and fauna, including fishing ponds, meadows, species on the at risk register including lapwing, skylark, bats and crested newts</p>	<p>Habitats for flora and fauna have been considered as part of all of the proposed SUEs. This site is adjacent to a Local Wildlife Site at the Carr Lane fishing ponds. Key biodiversity assets have been protected through the approach to the selection of appropriate SUE locations, and the identification of the developable areas within these locations. Any impacts on flora and fauna and their habitats will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS8 and CS19, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
Carr Lane, Prescott – Air Quality	<p>Air quality will be affected by increased volume of traffic and increase in CO2 from a loss of greenery</p>	<p>The Knowsley Monitoring Report 2014 (PP30) indicates that there are no Air Quality Management Areas (AQMAs) in Knowsley. Through the identification of the SUEs, there have</p>

23 CARR LANE, PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>been no issues raised in terms of a particular risk to air quality as a result of new development. The potential for impacts on air quality arising from development will be assessed as part of planning applications, in accordance with Policy CS2, alongside the SUE policies.</p>
<p>Carr Lane, Prescott - Flooding</p>	<p>Concern about the impacts of development of the Carr Lane site on flooding in the area, including:</p> <ul style="list-style-type: none"> • The site is traversed by stream and possibly farm ditches and is the lowest point of the surrounding topography • Building would intensify danger from flash floods • Even if culverting is used, there is a risk of backing up 	<p>The extent of flood risk has been considered as part of all of the proposed SUEs. The Green Belt Study (Examination library reference EB08) outlines how flood risk issues have been considered in relation to the selection of Green Belt locations. According to the Environmental Agency Flood Maps (November 2014) the site has a limited area of flood risk (predominantly Flood Zone 3) adjacent to Prescott Brook on the perimeter of the site. However as this is not extensive, there is no reason to suggest that it would preclude delivery of development within the SUE. A more detailed site-specific Flood Risk Assessment will be required for the site prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p> <p>Any impacts relating to surface water drainage arising from any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS2, CS19 and CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>

23 CARR LANE, PRESCOT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Carr Lane, Prescott - Infrastructure	Development will require additional medical centres and school places.	Infrastructure provision has been considered as part of all the proposed SUEs. Following liaison with a range of infrastructure providers, there have been no significant issues identified in ensuring that SUEs can be served by appropriate infrastructure, including schools and medical services. For some sites, on or off site infrastructure improvements may be necessary as a result of development and these will be assessed at the planning application stage in accordance with Policy CS27, alongside the SUE policies.
Carr Lane, Prescott – Impacts on Adjacent Areas	<p>The area around the development site will be subject to impacts, including:</p> <ul style="list-style-type: none"> • Damaging social cohesion in communities • There is a risk of crime, unrest and damages to wellbeing; policing should be addressed • Areas immediately beyond the site would be compromised in terms of quality of life, views and open space, excess traffic and congestion on busy roads, loss of air quality, noise and light pollution 	These concerns are acknowledged. However, there is no evidence to suggest that appropriately designed new development would cause significant harm to the quality of life of existing residents to an extent which renders the KLPCS unsound.. Furthermore the design of development will be subject to detailed requirements in the context of other Local Plan policy requirements relating to sustainable development and preventing impact upon surroundings when a planning application is submitted. Any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with policies in the KLPCS, including the SUE policies.

24 EAST OF HALEWOOD

24 EAST OF HALEWOOD

- East of Halewood - Green Belt Principles
- East of Halewood - Proposed SUE boundaries
- East of Halewood - Existing uses
- East of Halewood - Proposed uses
- East of Halewood - Master planning
- East of Halewood - Highways
- East of Halewood - Flora and fauna
- East of Halewood - Flooding
- East of Halewood - Air quality
- East of Halewood - Infrastructure
- East of Halewood - Impacts on adjacent areas

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
East of Halewood - Green Belt Principles	<p>The Council have failed to provide exceptional circumstances for the release of this site from the Green Belt and allocation as safeguarded land. There are concerns about the impact on the following aspects of Green Belt release:</p> <ul style="list-style-type: none"> • Government states that Green Belt cannot be developed except as a last resort – these circumstances have not been proven • Site prevents unrestricted sprawl, prevents the merging of neighbouring towns, assists in safeguarding the countryside from encroachment, preserves the setting and 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Issues of alternative sites, land supply and the detailed principles of Green Belt release are addressed separately in</p>

24 EAST OF HALEWOOD

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>special character of Halewood</p> <ul style="list-style-type: none"> • The Council has not looked anywhere else for development • There must be brownfield sites which should be developed instead, e.g. former Bridgefield Forum site, Halewood • There would be a loss of the natural break from other nearby communities, creating urban sprawl • Development would reduce separation distance between Liverpool and Widnes • There would hardly be a break from Liverpool docks to Widnes given that Halewood already merges with Hunts Cross/Speke and Woolton and Gateacre • Green Belt between Knowsley and Halton is quite small and has already been compromised by the A5300 and the Everton training centre. • Sites are precious green lungs which allow for recreational space and a barrier against urban sprawl • Countryside and high quality farmland will be affected • The development would destroy the rural character of Halewood Village • Development would be counter to the aims of other parts of the plan e.g. Policy CS8, identification of the M57 Green belt as a strategic green link 	<p>Chapters 6-9 and 11.</p>

24 EAST OF HALEWOOD

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> Taking away Green Belt status will make the land more likely to be developed <p>Support for early release of land to deliver a SUE to the East of Halewood to help address shortfall of housing land</p>	
East of Halewood - Proposed SUE boundaries	<p>Using Finch Lane as a boundary will not create a clearly defined and defensible Green Belt boundary. Finch Farm training complex has already impacted on the Green Belt, with further phases planned</p> <p>An alternative site off Greensbridge Lane at Tarbock would be more appropriate than land at Halewood (North), and would offer opportunities for self-build homes.</p>	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Under national Green Belt policy the allocation of the SUE must ensure that any new Green Belt boundaries will be robust and defensible to prevent further encroachment into the remaining Green Belt. These boundaries are provided by Finch Lane and Lower Road for the southern parcel of the SUE, irrespective of neighbouring uses within the Green Belt.</p>
East of Halewood - Existing uses	<p>The existing uses of the land at East Halewood are valuable and should be maintained, due to:</p> <ul style="list-style-type: none"> Green Belt should be left for future generations to enjoy 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement</p>

24 EAST OF HALEWOOD

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Residents use the land for recreational purposes • Loss of heritage and protected lands from the Doomsday book • Loss of public space including footpaths • The archaeological potential of the site • The countryside feel of the Yew Tree Farm shop and coffee barn will be ruined • The current of the land at Higher Road for grazing and nature conservation would disappear • Area is already affected by expansion of the Jaguar Land Rover plant, green areas are a respite from this • Existing airport and expressway already limit open space and fresh air 	<p>CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Any impacts relating to existing public rights of way arising from any proposal will be assessed as part of the required master planning of the site and through appropriate assessments as part of planning applications for new development, in accordance with policies in the KLPCS, including the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
East of Halewood - Proposed uses	<p>The need for new development in this area was questioned, due to:</p> <ul style="list-style-type: none"> • Population growth in Halewood does not show the need for the number of houses proposed – it is not clear how this figure has been determined • There are many properties for sale and rent in the area, more homes aimed at owner occupiers are not needed • People in Halewood cannot sell their houses as it is. 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Issues of housing needs, supply of land / premises, affordable housing and the detailed principles of Green Belt</p>

24 EAST OF HALEWOOD

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>The type, mix and quantum of development was questioned, including:</p> <ul style="list-style-type: none"> • Any plans could include inappropriate affordable housing for sale and rent • Any affordable housing target of 25% should be applied to any development • Site could readily accommodate 1200 to 1300 dwellings – evidence has already been submitted (RH26a). Yield should be at least 1200 dwellings rather than approximately 1100 dwellings <p>Support for modifications M001, M020, M022, M024, M168 providing clarification on the role of the SUEs including at East Halewood, for residential development</p> <p>Policy SUE2b is supported, subject to changes to SUE2</p>	<p>release are addressed separately in Chapters 6-9, 11 and 28.</p>
<p>East of Halewood - Master planning</p>	<p>Issues were raised about past and ongoing master planning, including:</p> <ul style="list-style-type: none"> • Past master planning work has indicated that even taking account of the open space and flood mitigation requirements, a significantly higher yield can be achieved. • Other uses may be appropriate on the southern portion of the site between Higher Road and the railway line to the south – the 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised here have been assessed in this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library</p>

24 EAST OF HALEWOOD

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>policy should be amended to make provision for this, with the SPD to provide guidance on what these uses might be</p> <ul style="list-style-type: none"> • Policy fails to provide flexibility to deliver necessary housing in the short term, with unnecessary delay coming from the requirement to prepare and be consistent with a single detailed masterplan for the whole SUE. Part of the site (to the south of Higher Road) could deliver homes sooner and should not be constrained by inclusion in the masterplan area. Site has highway and utility access. This part of the site should include provision to respond to demand for alternative uses to complement residential development. suggest wording change to focus on master planning within “core” areas and further flexibility for smaller individual parcels to come forward for development independently. 	<p>reference EX26 and EX34), including the approach to master planning.</p>
<p>East of Halewood - Highways</p>	<p>Concerns about the impacts of the proposed development at Halewood on highways in the area, because:</p> <ul style="list-style-type: none"> • Traffic is already bad on Higher Road • Traffic calming measures have been implemented on Okell Drive • Baileys Lane is already very busy, with double yellow lines in place • Peripheral development in Halewood will result 	<p>Highway provision has been considered as part of all the proposed SUEs. Following strategic studies (e.g. studies available as Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring that SUEs can be served by appropriate highway infrastructure. For some sites, on or off site highway works will be necessary, but it is considered that these are best assessed and agreed with the developer at the planning application stage in accordance with Policies</p>

24 EAST OF HALEWOOD

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>in an over reliance on cars</p> <ul style="list-style-type: none"> • Development would produce an unacceptable increase in traffic on already busy roads and lanes • There would be heavy traffic on local roads which are not suitable for the amount of housing proposed. They are already heavily used and always in a poor state of repair • Traffic congestion will cause disruption during and after building is complete • Higher Road will be a main east-west route serving the area, so will be subject to a huge increase in traffic. • Traffic management will be an issue • Traffic would be channelled through an already overused road and over congested junction at Higher Road / Aldersgate Drive • Current parking issues will be exacerbated <p>Add to the policy wording of policy SUE2b that there should be measures to ensure the safe and efficient operation of the strategic road network.</p>	<p>CS7 and CS27, alongside the SUE policies. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway works within the developer contributions process.</p> <p>The recommended change to the policy wording of policy SUE2b is unnecessary given the strategic road network is already covered by clause 2(a).</p>
East of Halewood - Flora and fauna	The existing site is home to a variety of flora and fauna. Hedges provided an environment for birds, small mammals and bats, which may be roosting in buildings on or close to the site. There are habitats at Widnes end of Ditton Brook that contain Great Crested Newts, which could also	Habitats for flora and fauna have been considered as part of all of the proposed SUEs. Key biodiversity assets have been protected through the approach to the selection of appropriate SUE locations, and the identification of indicative developable areas within these locations which exclude locally designated ecological assets. Any impacts on flora

24 EAST OF HALEWOOD

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>inhabit the site at Halewood. There is a need to protect wildlife, including owls, and woodland</p> <p>Question the reason for development outweighing any adverse affect on wildlife and their habitats. Habitats will be disrupted, and are unlikely to be replaced in the future. Impact on wildlife and wildflowers would be catastrophic</p> <p>There would be a significant loss of wildlife, including species such as skylark, lapwing, grey partridge and brown hare – all declining nationally and will be under threat of local extinction. There is no guarantee that the wildlife and woodland would be protected.</p>	<p>and fauna and their habitats will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS8 and CS19, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
<p>East of Halewood - Flooding</p>	<p>Concern about the impacts of development of the Carr Lane site on flooding in the area, including:</p> <ul style="list-style-type: none"> • Development would mean building on a natural floodplain • Known that part of the site is subject to flooding, but the degree to which this impacts on the capacity of the site is not precisely known • Northern section of the Halewood plan involves building on a flood plain. There is greater risk of flooding arising from global warming. • Main foul water pipes have previously burst, causing localised pollution 	<p>The extent of flood risk has been considered as part of all of the proposed SUEs. The Green Belt Study (Examination library reference EB08) outlines how flood risk issues have been considered in relation to the selection of Green Belt locations. Within the Strategic Flood Risk Assessment (Level 2) (Examination library reference EB15), areas of the site have been identified as being in Flood Zone 2 (20.82 ha) including a smaller area of Flood Zone 3 (15.89 ha). This has influenced the notional capacity in policy SUE 2b and Appendix E of the KLPCS. The findings of the SFRA (Level 2) have been accepted by the Environment Agency. A more detailed site-specific Flood Risk Assessment will be required for the site prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the</p>

24 EAST OF HALEWOOD

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Question why the site is proposed for development when Government advice says that development should avoid areas at risk from flooding • Considerations must take account of costs of local emergency services dealing with flood situations • Flood risk mitigation works will require massive investment • Flood mitigation moves the floods elsewhere. • We need to be making land available for possible flood storage, not less • Concerns about surface water and foul water flooding being exacerbated • The developer should not be allowed to build on this area without a proper and cohesive plan in place • Council should offer guarantee of compensation for anticipated flood damage and inconvenience, accept insurance responsibilities for citizens, and ensure that costs paid by the Council will not come from taxes 	<p>SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p> <p>Any impacts relating to surface water drainage arising from any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS2, CS19 and CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
East of Halewood - Air quality	<p>Concerns about impact on local air quality, including:</p> <ul style="list-style-type: none"> • Pollution aspects are yet to be considered • Local air pollution would have a detrimental 	<p>The Knowsley Monitoring Report 2014 (PP30) indicates that there are no Air Quality Management Areas (AQMAs) in Knowsley. Through the identification of the SUEs, there have been no issues raised in terms of a particular risk to air quality as a result of new development. The potential for impacts on air quality arising from development will be</p>

24 EAST OF HALEWOOD

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>impact on residents</p> <ul style="list-style-type: none"> • More excessive housing would increase the carbon footprint 	<p>assessed as part of planning applications, in accordance with Policy CS2, alongside the SUE policies.</p>
<p>East of Halewood - Infrastructure</p>	<p>Concerns about impact on local infrastructure provision to support new development, including:</p> <ul style="list-style-type: none"> • School and sixth form provision in the area is already limited • Most primary schools are oversubscribed and would be unable to accommodate the hundreds of new children – also applies to doctors and dentist surgeries • More people means a huge drain on existing services • There is no provision seen for increase in public transport • Schools and doctors would be over capacity • The number of new residents would need at least one extra school and medical centre • Question whether there would be any community facilities to allow for Parent and Toddler groups, uniformed organisations, etc. • The local services of shops and buses have not been taken into account • Question whether pressure on local amenities and schools has been considered – also will affect the ability of current residents to freely choose their children’s schooling • There has been no reference to infrastructure 	<p>Infrastructure provision has been considered as part of all the proposed SUEs. Following liaison with a range of infrastructure providers, there have been no significant issues identified in ensuring that SUEs can be served by appropriate infrastructure, including schools and doctors. For some sites, on or off site infrastructure improvements may be necessary as a result of development and these will be assessed at the planning application stage in accordance with Policy CS27, alongside the SUE policies.</p>

24 EAST OF HALEWOOD

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>or social, environmental and economic resources</p>	
<p>East of Halewood - Impacts on adjacent areas</p>	<p>The proposed development in Halewood would bring impacts to the surrounding areas, including:</p> <ul style="list-style-type: none"> • Development would change the nature of the existing settled community • Affects on farmland will disrupt local landowners and businesses, and affect supply of produce from the area • Concern about traffic noise • Flood risk mitigation works would cause a major disturbance to site neighbours • Fear that the surrounding area could become a flood plain • Concerns about impacts on house prices and the local area, including as a result of affordable housing provision • Local residents will lose their view 	<p>These concerns are acknowledged. However, there is no evidence to suggest that appropriately designed new development would cause significant harm to the quality of life of existing residents to an extent which renders the KLPCS unsound.. Furthermore the design of development will be subject to detailed requirements in the context of other Local Plan policy requirements relating to sustainable development and preventing impact upon surroundings when a planning application is submitted. Any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with policies in the KLPCS, including the SUE policies.</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

25 SOUTH OF WHISTON & LAND SOUTH OF M62

- South of Whiston & Land South of M62 - Green Belt
- South of Whiston & Land South of M62 - Proposed SUE boundaries
- South of Whiston & Land South of M62 - Existing uses
- South of Whiston & Land South of M62 - Proposed uses
- South of Whiston & Land South of M62 - Proposed mix of uses
- South of Whiston & Land South of M62 - Density of proposed development
- South of Whiston & Land South of M62 - Master planning
- South of Whiston & Land South of M62 - Highways
- South of Whiston & Land South of M62 - Flora and fauna
- South of Whiston & Land South of M62 - Flooding
- South of Whiston & Land South of M62 - Infrastructure
- South of Whiston & Land South of M62 - Air Quality
- South of Whiston & Land South of M62 - Impact on adjacent areas

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
South of Whiston & Land South of M62 - Green Belt	<p>Representations were received in support of:</p> <ul style="list-style-type: none"> • The immediate release of SUEs to meet identified needs. • The development of the South Whiston site for between 1,500 - 1,800 dwellings (depending on whether the Council owned land retained for cemetery expansion is included in the developable area). • The development of land to the South of the 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>It is understood that the DCLG changes to Planning Practice</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>M62 for employment.</p> <ul style="list-style-type: none"> • The proposals demonstrating a comprehensive approach to site development and infrastructure provision, including matters set out at paragraph 6A.18. <p>Representations were received which consider the policy approach to be unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • The approach does not take account of Eric Pickles MP Ministerial Statement in October 2014 relating to protection of Green Belt and prioritisation of brownfield sites. • No exceptional circumstances exist in Whiston to justify Green Belt release. • Absence of a five year housing land supply does not constitute very special circumstances. • No justification for Green Belt release, except for Council's financial benefit / developer profits. • Knowsley has a declining population so no justification for scale of housing required. • Inadequate consideration of potential alternative brownfield sites, empty properties, business premises and other Council land holdings, before pursuing Green Belt release as last resort (specific 	<p>Guidance on Green Belt, as covered in Secretary of State announcements, and the Planning Minister's Statement about the protection of the Green Belt and prioritisation of brownfield sites will be considered at new hearing sessions in June 2015. The Council intends to set out its views on these matters in its statements for those hearings.</p> <p>The Council has already accounted for the latest population projections from the ONS (the 2012-based sub-national population projections, published in 2014) (see Sub-National Population Projections Update, Examination library reference SD31). This matter was discussed at the July 2014 hearings; the Inspector has not raised any issues about the soundness of the Council's approach to setting a housing target.</p> <p>The matter of whether a neighbouring authority could meet any of Knowsley's housing requirement has been considered at length throughout the Plan preparation process. Earlier evidence demonstrated that this did not form a practicable solution to meet Knowsley's housing needs. Further explanation is given within the Council's Duty to Cooperate Statement (Examination library reference SD14 and SD30).</p> <p>Sustainability Appraisals (SD7, SD7a, SD9, SD9a, SD10, SD10a, SD10b) have been undertaken at different stages of the preparation of the KLPCS to assess the economic, social and environmental impacts and also upon sites within the Green Belt (SD8, SD8a and TR07) to ensure that the sites selected for allocation are in sustainable locations. The</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>examples listed under Policy CS3 Supply).</p> <ul style="list-style-type: none"> • Inadequate consideration of alternative land supply in neighbouring districts under duty to co-operate to address needs (specific examples listed under Policy CS3 Supply) before pursuing Green Belt release as last resort. • Housing requirements should be addressed at a sub-regional level and consider the influence on demand of significant changes such as the New Runcorn Bridge. Not consistent with national policy as Green Belt intended to prevent urban sprawl and merging of neighbouring towns - proposals in South Whiston and Cronton will bring Knowsley up to the boundary with St. Helens, Liverpool and Halton and increase likelihood of merging with nearby urban areas. • There is a need to take account of recent population figures - new study required. • Land should be retained as a green corridor. • There would be increased encroachment upon the countryside. • The proposed development will damage the character and identity of Whiston. • There would be harm to the natural landscape and accessibility to it. • The approach is not consistent with the 	<p>findings of the Sustainability Appraisals support the view that the Council has selected the most sustainable approach given the reasonable alternatives. The chosen policy approach complies with the NPPF.</p> <p>Highway provision has been considered as part of all the proposed SUEs. Following strategic studies (e.g. studies available as Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring that SUEs can be served by appropriate highway infrastructure. For some sites, on or off site highway works will be necessary, but it is considered that these are best assessed and agreed with the developer at the planning application stage in accordance with Policies CS7 and CS27, alongside the SUE policies. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway works within the developer contributions process.</p> <p>To support the proposed Supplementary Planning Document for this area, the Council has commissioned specialist consultants to prepare additional transportation evidence related to the South of Whiston and Land South of M62 SUE, to be delivered in two stages. Stage 1 will use an updated run of the Liverpool City Region Transport Model (LCRTM) to confirm the potential 'hotspots' (i.e. areas of traffic congestion / increase in journey times) on the road network as a result of the SUE's development. Stage 2 will confirm indicative</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>Council's objectives relating to "improving Knowsley the place" and "quality infrastructure and environment" within the Sustainable Community Strategy.</p> <ul style="list-style-type: none"> • Conflict with policies and objectives relating to the enhancement of Green Infrastructure (i.e. Policy CS8) • It is illegal to build on Green Belt. • Inadequate consultation has been undertaken and the significant extent of opposition in local community despite this. • The decision has been made by an unelected Inspector who doesn't live in the area and has not shown how his requirements have been calculated. • Disproportionate level of housing growth in Whiston compared to other parts of Knowsley. • Unsuitability of areas adjacent to motorways for residential development. • Ageing population reduces the need for new housing in the area - natural turnover of property sales and rental addresses local demand. • Would result in the loss of the last remaining Green Belt in South Whiston. • Any growth required in the local area should be slow and supported by growth in the local economy. • Contradicts the purpose of Green Belt to 	<p>mitigation measures to address the 'hot spots' identified at Stage 1. The Highways Agency will be consulted closely on this study as outlined in the Statement of Common Ground (SoCG) between the Council and the Agency (AD59).</p> <p>The allocation of the SUEs will result in the loss of agricultural land within the sites. The Council has previously provided a written response (CH05A) to the Inspector's Matter, Issues and Questions (EX06, Qu. 5.5) relating to the loss of agricultural land, with further discussion at the hearings in November 2013.</p> <p>Specific issues relating to consultation, housing needs, supply of land / premises, affordable housing and the detailed principles of Green Belt release are addressed separately in Chapters 2, 6-9, 11 and 28.</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>“retain attractive landscapes, and enhance landscapes, near to where people live”.</p> <ul style="list-style-type: none"> • Loss of historic character. • Knowsley Council should look at more ways to hasten brownfield development rather than sacrificing valuable Green Belt. • Insufficient detail of areas of Green Belt to be developed make it difficult to quantify harm at this stage (context of NPPF paras. 88 and 89) and no details of precise development. • Destruction of semi-rural / rural environment. • Not positively prepared - Councillors don't know how many dwellings will be built or who will live in them. • No detail of specific timescales for development. • Inconsistency of housing numbers and developable area with density of development assumptions applied to other sites in calculations. • Not a sustainable location in the Green Belt as required by NPPF para. 84. • The proposal to bring forward Green Belt release on such a scale will produce more houses than the SHLAA calls for. • Sustainability appraisal has numerous acknowledgements of negative impact relating to transport, climate change / 	

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>emissions, environmental and greenspace, landscape character, biodiversity, green infrastructure, air quality, agricultural land, outdoor activity / recreation and protecting land and soil.</p> <ul style="list-style-type: none"> • Conclusions within the sustainability appraisal are flawed relating to this site, including in terms of E1 (local character and accessibility of landscapes and countryside), E2 (protect, manage and enhance biodiversity...), E10 (reduce need to travel and improve choice and use of sustainable modes of transport) and S2 (safe and convenient highway access for the sites together with ...traffic mitigation measures). • Early release of Green Belt sites will undermine the demand for and development of brownfield sites and the Council's regeneration objectives. • Unwanted precedent for further release. • Councillors and MPs oppose the plans. • Does not take into account a number of national studies and best practice from national bodies ("A Nature and Wellbeing Act" proposed by the RSPB and Wildlife Trust referred to specifically). • Development won't be delivered based upon Knowsley Council's track record of not being capable of implementing changes. 	

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Given the attractiveness of such green field sites to developers, due to their better viability, redevelopment of brown field sites in the sub region could be compromised. • Now these sites are being promoted for removal from the Green Belt on adoption of the Core Strategy they need to be looked at in detail now. St.Helens is concerned that the approach and evidence to support these sites removal is light touch. Whilst this is acceptable for identifying a strategic location, as with the submission version, it is not acceptable for an allocation of land. • Given the lack of information at present and our concern about the impacts on St.Helens - sites should not be released from the Green Belt until the supporting Supplementary Planning Documents have addressed the concerns. • As specific Allocation Profiles are included within the Plan as a Modification we consider that the issue of mineral sterilisation prompting the need to consider the prior extraction of mineral resources and the presence of land instability should be identified in the 'Key Site Constraints and Opportunities' sections of relevant SUEs - these issues will impact on the deliverability and viability of these SUEs. 	

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
<p>South of Whiston & Land South of M62 - Proposed SUE boundaries</p>	<p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • The status of the Site of Former Saunders Garden Centre, which should be excluded from the SUE for the following reasons: <ul style="list-style-type: none"> a) It can be brought forward immediately as a standalone scheme and should not be delayed while it awaits the uncertain timescales for SUE SPD completion / adoption. b) It is previously developed land and is therefore different in character to the predominantly greenfield agricultural land comprising the South Whiston SUE. c) Precedent of the suitability of the land for development having been established by recently expired planning permission (approved 2010). d) Current approach ignores the amenity and other benefits of the site arising from early redevelopment, including contribution to five year housing land supply and prioritising previously developed land. e) The site is not required to achieve a satisfactory comprehensive development of the wider area. 	<p>Policy SUE 2c clause 1 requires the comprehensive development of the South of Whiston SUE, including the site of Former Saunders Garden Centre as identified in the associated allocation (see document CS10a). This site is currently within the Green Belt. In line with national Green Belt policy any new Green Belt boundaries will need to be robust and defensible to prevent further encroachment into the remaining Green Belt. For this reason the KLPCS proposed the removal of the entire SUE from the Green Belt. The SUE includes the Site of Former Saunders Garden Centre to ensure a comprehensive development and to avoid the creation of an isolated parcel of Green Belt which would not fulfil the purposes as listed at NPPF paragraph 80. Such an approach would also have a consequent need for very special circumstances to justify development. Furthermore as the previous permission was granted on the basis of the circumstances of a specific proposal, very special circumstances may not necessarily apply to a different scheme if Green Belt status is retained.</p> <p>The Technical Report: Sustainable Urban Extension (TR07) is clear that the developable area of South Whiston is restricted to areas outside outdoor sporting provision. In addition, the appropriate protection of identified outdoor sporting provision and Local Wildlife Sites is provided for by existing allocations alongside the SUE allocation that are not sought to be altered, with the notional capacity including deductions for these areas. Related matters such as tree, habitat and environment protection are provided by other policies in the KLPCS.</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>f) The principle of access of Windy Arbor Road close to the junction of the M62 and to the north off Lickers Lane has already been accepted by the Council.</p> <p>g) The Council has given no reason for the inclusion of the site at this stage, when it has been previously excluded.</p> <ul style="list-style-type: none"> • Loss of Whiston Juniors playing fields off Windy Arbor Road / Lickers Lane. • Loss of Big Water and Old Wood for recreational purposes including fishing. 	
<p>South of Whiston & Land South of M62 - Existing uses</p>	<p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • Loss of agricultural land (Grade 2 BMV) for food production and loss of associated employment - impact upon food poverty. • Lack of and loss of greenspace, “green lungs” and access to recreational space / natural environment for local residents. • Current shopping provision in Whiston village cannot support new development and is underused at present due to retail park at Prescot. Further outlets would lead to existing shops closing. • Modifications take the emphasis off investment in existing locations and place it firmly on the “new” – Knowsley has little 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council’s approach to be sound (Examination library reference EX26 and EX34).</p> <p>Sustainability Appraisals (SD7, SD7a, SD9, SD9a, SD10, SD10a, SD10b) have been undertaken at different stages of the preparation of the KLPCS to assess the economic, social and environmental impacts and also upon sites within the Green Belt (SD8, SD8a and TR07) to ensure that the sites selected for allocation are in sustainable locations. The findings of the Sustainability Appraisals support the view that</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>appetite to fill empty space in Huyton Business Park and empty units at nearby Fallows Way.</p>	<p>the Council has selected the most sustainable approach given the reasonable alternatives. The chosen policy approach complies with the NPPF.</p> <p>The allocation of the SUEs will result in the loss of agricultural land within the sites. The Council has previously provided a written response (CH05A) to the Inspector's Matter, Issues and Questions (EX06, Qu. 5.5) relating to the loss of agricultural land, with further discussion at the hearings in November 2013.</p> <p>Greenes Road District Centre in Whiston had 0% vacancy of A1 - A5 units when surveyed at August 2013. Furthermore policy SUE 2c permits consideration of requirements for local retail provision (identified as convenience retail in policy CS6 clause 5c) to address needs arising from the site and/ or appropriate financial contributions to address these needs off-site.</p> <p>There is not a significant headroom or surplus of employment land supply or vacant premises relative to requirements up to 2028 as demonstrated by Table 5.1A of the Local Plan: Core Strategy (Proposed modification M071).</p>
<p>South of Whiston & Land South of M62 - Proposed uses</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • The philosophy of new housing contributing to economic development and population 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>retention is fundamentally flawed (reference to KGBS 14, SA objective EC1).</p> <ul style="list-style-type: none"> • Not policy compliant - the proposed approach does not meet the objectives of restoring soil and land quality with a detrimental impact upon emission reduction target and carbon budget. • Absence of need for new business park on land to South of M62 - given existing vacancies (Huyton Business Park, Kings Business Park and Whiston Business Parks offered as examples). • Existing employment opportunities for local Whiston residents are overestimated and do not justify the scale of residential development proposed and the conclusions of the Sustainability Appraisal. • The Council does not appear to have much control over how many houses will be built in a given time - too much freedom for developers in the proposed policy approach. • Proposed housing will not be affordable for local residents given levels of unemployment and deprivation experienced locally. • Future employment opportunities for locals are overstated and aspirational - no guarantees. • Executive aspirations are unachievable in 	<p>soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>The allocation of the SUE must ensure that any new Green Belt boundaries will need to be robust and defensible in line with national Green Belt policy to prevent further encroachment into the remaining Green Belt. For this reason the KLPCS proposes the removal of the entire Land South of M62 SUE from the Green Belt, irrespective of the differing land uses (including a country park) as identified in policy SUE 2c.</p> <p>The proposed new housing within the South of Whiston SUE is complemented by new employment opportunities associated to the neighbouring Land South of M62 SUE. In addition, the South of Whiston SUE is close to existing employment areas (Whiston Enterprise Park and Huyton Business Park) and has access to wider opportunities via sustainable modes of travel and the adjacent strategic highway network (M62 / M57 / A5300).</p> <p>Issues of needs and supply of land / premises for housing and employment, affordable housing and the detailed principles of Green Belt release are addressed separately in Chapters 6-9, 11 and 28.</p> <p>The proposed houses to be delivered on the South of Whiston SUE as part of any subsequent application will need to be</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>an area of little or no employment opportunities.</p> <ul style="list-style-type: none"> • No details of type of housing – don't want social housing. • Employment in building industry is short term and would have little impact on local unemployment – no guarantees local firms will be used either. 	<p>guided by the policies of the KLPCS and any associated guidance provided in Supplementary Planning Documents, linking to evidenced needs.</p>
<p>South of Whiston & Land South of M62 - Proposed mix of uses</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Inadequate local employment opportunities to support the scale of residential development proposed. • There is a need to open a country park at Cronton. • Impact of the proposal on the delivery of the proposed country park in Cronton. • Unclear why so much Green Belt is required to be released from the Green Belt to the south of the M62 when only a third is reported to be developed. If a large area of the site is going to become a country park then why is it necessary to remove from the Green Belt? • No mention of timescale for implementation of the country park and if funding for it is in place. • Consideration should be given to the area 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Issues relating to housing, employment and retail are dealt with separately in Chapters 6 - 9 and 11.</p> <p>Aspirations of residents for uses such as parkland and community allotments are noted. Subject to consistency with the delivery of the proposed development these aspirations may be capable of being considered at least in part within the proposed Supplementary Planning Document for this area.</p> <p>Policy SUEc expresses support for the delivery of the country park, however timescales of delivery are subject to the</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>of ex-Saunders garden centre on Windy Arbor Road and land adjacent to Tarbock Island/M62 for alternative use as community allotments.</p> <ul style="list-style-type: none"> The area should be developed as parkland. 	<p>intensions of the owners of this part of the SUE - the Land Trust.</p>
<p>South of Whiston & Land South of M62 - Density of proposed development</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> Pressure on Green Belt should be reduced by increasing density on brownfield sites, including building luxury high rise. Density of South Whiston is inconsistent and misleading - 75% of proposed area of 110.3 hectares minus 27.6 = 82.70 hectares @30 dwellings per hectare is 2,481 dwellings. The Council have only declared 1,503 dwellings - calls estimates of housing into question. 	<p>The Council's Technical Report: Sustainable Urban Extensions (TR07) provides details of housing delivery including density of developments of over 50 dwellings with completions during 2012/13 - 2013/14 in Table 5.3 (pg. 29). This demonstrates a range of between 8 and 82 dwellings per hectare (dph), which in an example of the potential variance of density which assumptions intend to accommodate. In such circumstances it is inevitable that planning permissions will on occasion comprise both higher and lower densities than assumptions made within the SHLAA. However the average assumed densities of SHLAA sites of 33.2 dph and 31.2 dph for the 0-5 year and 6-10 year supply respectively are well within the correct range when compared with those within existing planning permission which had an average density of 37.5 dph at 1 April 2013. It is therefore not considered that SHLAA assumptions under-estimate potentially deliverable dwellings, or that they significantly influence the overall need for the Sustainable Urban Extensions.</p> <p>Site densities within Sustainable Urban Extensions for residential development at 30 dph are applied (except Land bounded by A58, Prescott which is 25 dph) following necessary deductions from the gross site area to reflect the net development area. Gross developable areas and the</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>calculation to net developable areas are identified in the Green Belt Technical Report (TR03) Appendix 7. Subsequent changes resulted in reduced capacity to the South of Whiston SUE (- 29 dwellings) in response to developer engagement. The notional capacity of 1,500 dwellings takes account of constraints within the SUE such as pre-existing land uses (such as Fox's Bank Lane Cemetery), Local Wildlife and Geological Sites and the outdoor sports provision that are protected by other policies in the KLPCS.</p>
<p>South of Whiston & Land South of M62 - Master planning</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Note that Supplementary Planning Document to look at the detail for the site is going to be prepared. Ideally the content, detail and evidence for this should have been produced alongside this consultation whereby we could assess the impacts upon St.Helens with better information. • Object to third part of Policy SUE2 where masterplan is required to “accord” with development plan policy “<i>and any associated Supplementary Planning Document</i>” – inappropriately incorporates an SPD into development plan policy when it has not been subject to the examination process. SPDs are only a material consideration in planning decisions. • The SUE SPDs have not been prepared at 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council’s approach to be sound (Examination library reference EX26 and EX34), including the approach to master planning and decision making in accordance with Supplementary Planning Documents set out in the proposed modifications.</p> <p>The concerns expressed regarding the content of Supplementary Planning Documents are premature to the potential content and consultation process to be undertaken. It remains the Council’s responsibility to ensure that new statements of policy are not introduced.</p> <p>The Coal Authority has been consulted at every stage of plan</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>present – wholly inappropriate to require planning decisions to accord with them when it is not known what matters they cover and whether they are policy compliant particularly in terms of viability.</p> <ul style="list-style-type: none"> • Need for consistency of the approach to the SUE SPDs will modifications to other parts of the Plan which have been modified to remove any requirement to accord with SPDs. • Risk that the master planning approach via SPDs would be unlawful for the following reasons: <ul style="list-style-type: none"> a) vagueness of what the Development Plan leaves as the potential content of the SPD - Appendix E is not comprehensive and the SPD therefore risks introducing new statements which regulate the development of SUEs. b) reference in Policy SUE2 to the SPD containing a spatial development framework and further details of development and infrastructure requirements, envisages the SPD going beyond its lawful scope. c) lack of clarity in policy SUE2 means the policy itself could be unlawful – clause 3 runs risk of requesting “further development requirements” which could 	<p>preparation and has not objected to the feasibility of developing the South of Whiston SUE. The issues of prior mineral extraction, mineral safeguarding and mining legacy can be considered through the master planning process and when a planning application is received.</p> <p>Under national Green Belt policy, any new Green Belt boundaries will need to be robust and defensible to prevent further encroachment into the remaining Green Belt. For this reason, the KLPCS proposed the removal of the entire SUE from the Green Belt.</p> <p>The notional capacity of 1,500 dwellings takes account of constraints within the SUE such as Local Wildlife and Geological Sites and the outdoor sports provision that are protected by existing allocations and other policies in the KLPCS.</p> <p>Consideration of issues such as design can be undertaken at planning application stage and through the master planning stage with reference to existing policies of the KLPCS and SPDs as appropriate.</p> <p>To support the proposed Supplementary Planning Document for this area, the Council has commissioned specialist consultants to prepare additional transportation evidence related to the South of Whiston and Land South of M62 SUE, to be delivered in two stages. Stage 1 will use an updated run of the Liverpool City Region Transport Model (LCRTM) to confirm the potential ‘hotspots’ (i.e. areas of traffic congestion</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>be interpreted as excluding policy provisions which the decision maker intends to guide decision making.</p> <p>d) SPD may contain new statements of policy that have not been tested at examination.</p> <ul style="list-style-type: none"> • The development will be influenced by local geology - a new survey is required to address the significant amount of previous mine workings within the site. Cronton Colliery was closed down due to a major geological fault. • Concern about the potential for piecemeal development, if a proposal only takes account of a small section of a large parcel of land this could result in incompatible, planned and unsympathetic development. • No reference to the playing field within the text dealing with SUE 2c. • The site boundary of the SUE shown in appendix E includes the playing field off Windy Arbor Rd and as such it is land allocated for residential use. However, the Green Belt Technical Report excludes the playing field from the developable area in capacity calculations • The inclusion of the playing field land within the SUE is inconsistent with the objective of policy CS8 which seeks to maintain and 	<p>/ increase in journey times) on the road network as a result of the SUE's development. Stage 2 will confirm indicative mitigation measures to address the 'hot spots' identified at Stage 1. The Highways Agency will be consulted closely on this study as outlined in the Statement of Common Ground (SoCG) between the Council and the Agency (AD59).</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>enhance green infrastructure (including outdoor sports provision). As the whole of the site is identified by the allocation boundary for the SUE this implies that any area within the site could be developed. This creates a degree of ambiguity and weakens the message / intention to protect the existing areas used for outdoor sport.</p> <ul style="list-style-type: none"> • Potential for unacceptable and unsympathetic design of development. 	
<p>South of Whiston & Land South of M62 - Highways</p>	<p>Highways Agency concludes the plan is not unsound, however concerns expressed in terms of:</p> <ul style="list-style-type: none"> • Highways evidence has not been updated to reflect the change to allocation of SUEs and modifications to the scale, sizes and land use - although noted the scale and trip generation is less in the Core Strategy than assessed in the Transport Feasibility Study. The following issues however remain: <ul style="list-style-type: none"> a) Concerns in relation to the approach adopted by the Transport Feasibility Study in 2013. b) Critical junctions for improvement were identified in the Transport Feasibility Study, but no direct consideration was given to the strategic road network and 	<p>Highway provision has been considered as part of all the proposed SUEs. Following strategic studies (e.g. studies available as Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring that SUEs can be served by appropriate highway infrastructure. For some sites, on or off site highway works will be necessary, but it is considered that these are best assessed and agreed with the developer at the planning application stage in accordance with Policies CS7 and CS27, alongside the SUE policies. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway works within the developer contributions process.</p> <p>The recommended change to the policy wording of policy SUE2 and SUE c is unnecessary given the strategic road network is already covered by clause 2(a) of policy SUE2c.</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>no mention is made specifically to it in the Core Strategy or SUE policies.</p> <p>c) Evidence relating to the current version of the Plan should be prepared to enable a view to be taken in terms of the transport influences of the allocations and any measures required to support the development aspirations.</p> <p>d) The above issue extends to the Infrastructure Delivery Plan prepared in 2012, which does not mention the SUEs.</p> <ul style="list-style-type: none"> • Notwithstanding the above, Highways Agency accepts there is an evidence base basis for the transport policies in the Local Plan: Core Strategy and 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. • 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. This 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. • Suggested wording changes to the 	<p>To support the proposed Supplementary Planning Document for this area, the Council has commissioned specialist consultants to prepare additional transportation evidence related to the South of Whiston and Land South of M62 SUE, to be delivered in two stages. Stage 1 will use an updated run of the Liverpool City Region Transport Model (LCRTM) to confirm the potential 'hotspots' (i.e. areas of traffic congestion / increase in journey times) on the road network as a result of the SUE's development. Stage 2 will confirm indicative mitigation measures to address the 'hot spots' identified at Stage 1. The Highways Agency will be consulted closely on this study as outlined in the Statement of Common Ground (SoCG) between the Council and the Agency (AD59).</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>following (to reflect the above):</p> <ul style="list-style-type: none"> a) SUE2 clause 1 (g): add “including considering the impact of development on the strategic road network and identifying appropriate supporting measures” b) SUE2 clause 3: add “including at the strategic road network”. c) SUE2c clause 2(a): add “and measures to ensure the safe and efficient operation of the strategic road network at M57 Junction 2”. <p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • Transport evidence is out of date / inaccurate. • Increased traffic congestion arising for the development (additional 1,800 - 2,000 cars) – harm to existing local network - Windy Arbor Road, Lickers Lane, Dragon Lane, Dragon Drive, St. Nicholas and Pottery Lane mentioned specifically. • Pressure on the capacity of Lickers Lane and junction of M62 / M57 (Tarbock Island) which are already heavily used - potential for chaos. • Impact upon highway safety. 	

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • The proposed development will increase dependency on car travel as the development is unsustainable. • Inadequate public transport provision – no buses in evening. • Car parking issues. • An up to date transport study relating to the impacts upon the area is required. • Impact upon highway safety - increased risk of accidents due to volume of traffic. • Not a sustainable location - not served by public transport and unacceptable increase in traffic on Fox's Bank Lane and Blundells Lane, both of which are in St. Helens borough and within Rainhill Parish Council area. • To suggest building a large number of houses will increase public transport is naïve in the least and downright misleading (comments in context of SA appraisal). • Proximity to M62 causes diversions through Whiston when accidents occur – development will worsen congestion. • Recent loss of evening bus services. • Regular passenger surveys at Whiston station are with a view to closure. • Concerns about potential points of access on Windy Arbor Road, Lickers Lane and Fox's Bank Lane. 	

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Particular concern about traffic generation arising from such a development on Blundells Lane and Mill Lane from St.Helens Council. <p>Recommendations:</p> <ul style="list-style-type: none"> • Whiston needs a by-pass to ease congestion. • New up to date transport assessment required. 	
South of Whiston & Land South of M62 - Flora and fauna	<p>The plan is unsound and not legally compliant because of :</p> <ul style="list-style-type: none"> • Conflict with the objectives in local and national policy to enhance, protect and manage biodiversity, protect endangered habitats, species and geodiversity. • Loss of agricultural land adjoining Big Water and Old Wood which currently provides refuge for nationally endangered red listed grey partridge, together with sky lark, yellow hammer, buzzards, kestrels, pheasants, sparrows, goldfinch, wrens, greenfinches, bees, butterflies, bats, foxes, squirrels, moorhens, hedgehogs, woodpecker, rabbits and hare, invertebrates and migrating water fowl such as swans, Canada geese, coots and 	<p>Habitats for flora and fauna have been considered as part of all of the proposed SUEs. Key biodiversity assets have been protected through the approach to the selection of appropriate SUE locations, and the identification of the developable areas within these locations. Any impacts on flora and fauna and their habitats will be assessed through appropriate assessments as part of the master planning process and when planning applications are received for new development, in accordance with Policies CS8 and CS19, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>herons.</p> <ul style="list-style-type: none"> • Impact on Big Water and Old Wood irrespective of whether they are retained due to pressure of surrounding development – isolated and unsustainable as a quality natural landscape and habitat for wildlife. • Potential loss of trees and shrubs with associated wildlife. • Loss of wildflowers. • Potential loss of ancient woodland with increased risk of vandalism and fly tipping. • Affecting areas of priority habitat and Local Wildlife Sites together with the water table and impacts on Halsnead fishing lake – lack of mitigation is recognised in the sustainability appraisal as a major negative impact. • Colonization of protected and endangered species will be prevented by fragmentation of habitat networks. • Inadequate dispersal of species will cause a local and regional extinction of nationally significant and endangered species. • No mention is made in the Habitat Assessment of any impact on non-native invasive species on planned development, i.e. Japanese knotweed, Himalayan balsam, etc, which are present – no evidence of risk assessment performed. 	

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Timing of habitat survey in October is not sound – many species are dormant or in hibernation, and desktop nature of survey is not adequate. • Disturbance to local wildlife during long phases of construction. • Full ecological, habitat and archaeological surveys required. 	
South of Whiston & Land South of M62 - Flooding	<p>The plan is unsound and not legally compliant because of :</p> <ul style="list-style-type: none"> • Flooding in 2007 was extensive- the site provides flood mitigation for the local area through soak away. • Development will impact on the ability of main drains to handle future downpours (reference made to DEFRA 2009 study regarding loss of Green Belt on drainage). • Proposal reduces resilience to increased flood risk - M62 may flood if the site is developed. • Surely land on the flood plain cannot be developed. • Development on land to the South of the M62 will be prone to flooding as it is lower lying. • Flood risk to properties on Foxshaw Close and Windy Arbor Road due to the very high 	<p>The extent of flood risk has been considered as part of all of the proposed SUEs. The Green Belt Study (Examination library reference EB08) outlines how flood risk issues have been considered in relation to the selection of Green Belt locations. Within the Strategic Flood Risk Assessment (Level 2) (Examination library reference EB15), areas within the Land to the South of M62 have been identified as being Flood Zone 2 (9.3 hectares or 12%) with a reduced area of this also being Flood Zone 3 (6.7 hectares or 9%). The findings of the SFRA (Level 2) have been accepted by the Environment Agency. A more detailed site-specific Flood Risk Assessment will be required for the site prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p> <p>According to the Environmental Agency Flood Maps (November 2014), no areas of the South of Whiston SUE are within Flood Zones 2 and 3. Consequently there is no reason</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>water table in the localised area (including Green Belt land to rear)</p> <ul style="list-style-type: none"> • No evidence of Knowsley having accessed Environment Agency flooding records. • Strategic Flood Risk Assessments need to be completed to identify areas at risk of flooding in the proposed building sites. 	<p>to suggest that flood risk would preclude delivery of development, necessitate a specific design of scheme within the SUE or result in any increased flood risk to neighbouring properties. A more detailed site-specific Flood Risk Assessment will however be required for the site prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process, including consideration of issues such as surface water and drainage.</p>
<p>South of Whiston & Land South of M62 - Infrastructure</p>	<p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • Need for additional evidence relating to infrastructure requirements. • Inadequate local infrastructure, amenities, services and shopping provision to support new development – cumulative impact when considered with other proposed developments. • Increase in residents will place pressure upon local amenities and services including doctors, hospital, school provision, local shops, ambulances, fire, policing, social services, and nurseries. • Recent closure of library. • Need for research into capacity of doctors, 	<p>Infrastructure provision has been considered as part of all the proposed SUEs. Following liaison with a range of infrastructure providers, there have been no significant issues identified in ensuring that SUEs can be served by appropriate infrastructure, including utilities, schools and doctors. For some sites, on or off site infrastructure improvements may be necessary as a result of development and these will be assessed at the planning application stage in accordance with Policy CS27, alongside the SUE policies.</p> <p>To support the proposed Supplementary Planning Document for this area, the Council has commissioned specialist consultants to prepare additional transportation evidence related to the South of Whiston and Land South of M62 SUE, to be delivered in two stages. Stage 1 will use an updated run of the Liverpool City Region Transport Model (LCRTM) to confirm the potential 'hotspots' (i.e. areas of traffic congestion</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>dentists and schools - local children already travel out of the Borough for schools and doctors are full.</p> <ul style="list-style-type: none"> • Pressure on utilities - water supply, electricity, sewage facilities, television, telephone. • Not sustainable development as infrastructure requirements have not been met. • There already exists a significant interaction of Knowsley residents accessing school places in south St. Helens due to the quality of the schools in the area. This not only creates local traffic but pressure on schools places. A further 1,500 homes on the South Whiston site will add to this situation. <p>Recommendations:</p> <p>Further information is requested on the impacts of the development on Knowsley residents accessing school places in south St. Helens and the proposed mitigation on both highways and schools capacity in the area.</p>	<p>/ increase in journey times) on the road network as a result of the SUE's development. Stage 2 will confirm indicative mitigation measures to address the 'hot spots' identified at Stage 1. The Highways Agency will be consulted closely on this study as outlined in the Statement of Common Ground (SoCG) between the Council and the Agency (AD59).</p>
South of Whiston & Land South of M62 - Air quality	<p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • Impact upon health and wellbeing through reduced air quality resulting from increased 	<p>Knowsley currently has no Air Quality Management Areas designated. Through the identification of the SUEs, there have been no issues raised in terms of a particular risk to air quality as a result of new development. The potential for impacts on air quality arising from development will be assessed as part</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>pollution / carbon emissions arising from South Whiston development and associated loss of recreation space.</p> <ul style="list-style-type: none"> • Loss of trees which filter carbon emissions. • Industrial development of land to the South of M62 will cause increased pollution. 	<p>of planning applications, in accordance with Policy CS2, alongside the SUE policies.</p>
<p>South of Whiston & Land South of M62 - Impact on adjacent areas</p>	<p>The plan is unsound and not legally compliant because of:</p> <ul style="list-style-type: none"> • Direct impact upon existing residents of the Mobile Home park. • Loss of views and outlook from neighbouring properties. • Increased noise pollution and disturbance to local residents. • Impact upon health and wellbeing through loss of recreation and outdoor sports space. • Increase in population will increase crime levels. • Increased light pollution adversely affecting the observatory at Pex Hill. • Loss of recreation space for fishing and walking will increase the potential for crime. • Insufficient evidence and no mitigation suggested for negative effects on water - potential harm to fishing lakes. • Provision of parks and open spaces in deprived areas such as Knowsley is worse 	<p>These concerns are acknowledged. However, there is no evidence to suggest that appropriately designed new development would cause significant harm to the quality of life of existing residents to an extent which renders the KLPCS unsound. Furthermore the design of development will be subject to detailed requirements in the context of other Local Plan policy requirements relating to sustainable development and preventing impact upon surroundings when a planning application is submitted. Any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with policies in the KLPCS, including the SUE policies.</p>

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>than in affluent areas – removal of this area of Green Belt would severely impact upon deprived residents.</p> <ul style="list-style-type: none"> • Impact upon sustainability - the site is not within a priority zone for renewable and low carbon energy – builders now need not put in place the high specifications needed in the development to mitigate climate change – due to removal of requirement for Code for Sustainable Homes, BREEAM, etc. • Proposals ignore social welfare and interests of Whiston residents. • Impact upon and potential loss of nearby riding school / equestrian uses. • Not sustainable and increased carbon impact. • Denial of access to natural environment. • Increases physical, social, emotional and psychological challenges to an area suffering existing deprivation. • Impact on listed features of historic interest within Halsnead Park. • Influence of mining legacy and the potential for workable coal measures remaining. • Harm to the objective of improving community decision making. • Will result in segregation of Whiston into two communities. • Loss of access to land breaches human 	

25 SOUTH OF WHISTON & LAND SOUTH OF THE M62

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>rights.</p> <ul style="list-style-type: none">• Devaluation of property.• Disturbance to local residents during long phases of construction.	

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

- Safeguarded Land - Knowsley Village – Green Belt Principles
- Safeguarded Land - Knowsley Village – Safeguarded Status
- Safeguarded Land - Knowsley Village – Proposed Safeguarded Land boundaries
- Safeguarded Land - Knowsley Village – Existing Uses
- Safeguarded Land - Knowsley Village – Proposed Uses
- Safeguarded Land - Knowsley Village – Density of Proposed Development
- Safeguarded Land - Knowsley Village – Highways
- Safeguarded Land - Knowsley Village – Flora and Fauna
- Safeguarded Land - Knowsley Village – Flooding
- Safeguarded Land - Knowsley Village – Infrastructure
- Safeguarded Land - Knowsley Village – Air Quality
- Safeguarded Land - Knowsley Village – Impacts on Adjacent Areas

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Safeguarded Land - Knowsley Village – Green Belt Principles	<p>The Council have failed to provide exceptional circumstances for the release of this site from the Green Belt and allocation as safeguarded land. There are concerns about the impact on the following aspects of Green Belt release:</p> <ul style="list-style-type: none"> • Development would be in direct conflict with national policy to protect Green Belt land • There may be alternative sources of land which may be less sensitive would prevent the need for Knowsley Village to be safeguarded, e.g. land within Liverpool City 	<p>All SUE and safeguarded sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p>

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>Council area</p> <ul style="list-style-type: none"> • Housing need does not justify the loss of Green Belt • Green Belt should be there to protect historic nature of settlements 	
<p>Safeguarded Land - Knowsley Village – Safeguarded Status</p>	<p>Proposals to safeguard land until after 2028 are unsound, because:</p> <ul style="list-style-type: none"> • Land at Knowsley Village is not required to meet any housing need during the plan period, and should therefore remain in the Green Belt • The perceived need for housing after 2028 cannot justify the release of land now. It is difficult and speculative to predict need 14 years ahead. • Residents are being misled about the safeguarded status, developers will be able to submit applications from April 2015, with construction soon after 	<p>The Council provided evidence relating to the approach to and requirement for safeguarded land at Land at Knowsley Village in the Statements to the July hearings (CH13A, Qu.2.3). In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>In accordance with NPPF paragraph 85, safeguarded land is not allocated for development at the present time and planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development.</p>
<p>Safeguarded Land - Knowsley Village – Proposed Safeguarded Land boundaries</p>	<p>The proposed boundary for the area of safeguarded land is not appropriate, due to:</p> <ul style="list-style-type: none"> • Proposed site represents a disproportionate extension of the Village • The development would make the village into a small town • The Village was originally built to 	<p>All SUE and safeguarded sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings,</p>

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>accommodate only 500 families</p> <ul style="list-style-type: none"> • The site is not well contained • There is a very clear division between Knowsley Village and the wider countryside set by Ormskirk Road • Part of the site contains an area of designated public open space, leased by Knowsley Town Council, therefore this area cannot be used for development • It would be excessive to have over 1000 houses more, unless landscaping and preservation of sizeable areas of land are guaranteed • The Council should consider the implication of the number of dwellings before formally allocating the site. The council must ensure that any future development is the correct size for Knowsley Village and it's proportionate. • Alternative sites to the north west and south west of the village would be more suitable for development. 	<p>the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34), including the discounting of alternative sites.</p> <p>In accordance with NPPF paragraph 85, safeguarded land is not allocated for development at the present time and planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development.</p> <p>The notional capacity of the site, accounts for the existing urban greenspace allocation (unaffected) which is subject to the separate protection of emerging KLPCS policies CS8 and CS21.</p>
Safeguarded Land - Knowsley Village – Existing Uses	<p>The existing uses of the site are valuable and should not be changed, due to:</p> <ul style="list-style-type: none"> • The need protect local distinctiveness, character or quality of the village. Changes would be contrary to the vision and objectives of the plan 	<p>All SUE and safeguarded land sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at</p>

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Proposals would damage the special landscape character and appearance of the area, which is semi-rural and in some parts, very rural and remote • The need to protect adjacent heritage assets or biological interest. Knowsley Village heritage goes back as far as the Domesday Book • The site provides a green lung and is well used by local people, for example dog walkers, horse riders, walkers elderly and young • Children use the wooded areas for recreation • Land is good arable agricultural land and is under permanent cultivation 	<p>earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>The allocation of the safeguarded land is likely to result in the loss of agricultural land within the sites. The Council has previously provided a written response (CH05A) to the Inspector's Matter, Issues and Questions (EX06, Qu. 5.5) relating to the loss of agricultural land, with further discussion at the hearings in November 2013.</p>
Safeguarded Land - Knowsley Village – Proposed Uses	<p>The need for safeguarded land for future development in this area was questioned, due to:</p> <ul style="list-style-type: none"> • Residents don't want to live in a small city • Would like Knowsley Village to stay a small village and not a housing estate • Alternatively the site could be viably used for 2,000 allotments, which would be popular and generate income for the Council. • The building of Council properties would destroy the area 	<p>All SUE sites and safeguarded land have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>Aspirations of residents for alternative uses such as community allotments are noted, but are not likely to be</p>

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>deliverable at the scale suggested given the requirement for the SUE sites to address Knowsley's development requirements up to 2028 and safeguarded land for the period beyond.</p>
<p>Safeguarded Land - Knowsley Village – Density of Proposed Development</p>	<p>The proposed density of residential development within the proposed safeguarded land is inappropriate, due to:</p> <ul style="list-style-type: none"> • As a result of the sensitivity of the location, the density was reduced, which means that the proposal is land hungry, and is inappropriate in the Green Belt • Lord Derby has questioned whether 1093 dwellings could be satisfactorily accommodated on site, and hence density could fall below 25dpa. • Development density is greater than the other sites proposals, is unsound in promoting excessive development density • High density development with little green space has proven to be detrimental to society 	<p>In his Interim Findings, the Inspector has found the Council's approach to safeguarded land at Knowsley Village to be sound (Examination library reference EX34).</p> <p>The notional capacity for the safeguarded land at Knowsley Village reflects an assumed density of 25 dwellings per hectare, which is comparable to the SUE sites in accounting for potential future master planning and resultant landscaping to minimise adverse impacts on historic assets in the area.</p> <p>In accordance with NPPF paragraph 85, safeguarded land is not allocated for development at the present time and planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development.</p>
<p>Safeguarded Land - Knowsley Village – Highways</p>	<p>Concerns about the impacts of the proposed safeguarding of land for development at Knowsley Village on highways in the area, due to existing issues, including:</p> <ul style="list-style-type: none"> • Knowsley Village and the surrounding area 	<p>Highway provision has been considered as part of all the proposed SUE sites and safeguarded land. Following strategic studies (e.g. studies available as Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring</p>

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>road network are already at capacity</p> <ul style="list-style-type: none"> • Traffic on Knowsley Lane is a serious problem – it is overstressed at peak times and accessing it can be difficult and dangerous • There is constant traffic from 6am to 10pm on Knowsley Lane, with noise pollution from the road and the motorway affecting the village • There are current issues accessing Sugar Lane, Longborough Road, Tithebarn Road, and Ormskirk Road • Parking outside of the Industrial Park is often excessive on Sugar Lane and Knowsley Lane • There are additional traffic hazards since the opening of offices on Ormskirk Road • No money has been spent on improvement to the roads and infrastructure <p>Concerns about the impacts of the proposed safeguarding of land for development at Knowsley Village on highways in the area, due to potential issues arising from development, including:</p> <ul style="list-style-type: none"> • Development would mean more car journeys into the village • Whether roads can cope with the additional traffic • Additional traffic generation will generate 	<p>that SUEs and safeguarded land can be served by appropriate highway infrastructure. For some sites, on or off site highway works will be necessary, but it is considered that these are best assessed and agreed with the developer at any future planning application stage. In the case of the safeguarded land at Knowsley Village this would be after 2028 if it is to accord with the Plan. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway works within the developer contributions process.</p> <p>In accordance with NPPF paragraph 85, safeguarded land is not allocated for development at the present time and planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development. Transport assessments will be likely to be required as part of any future planning application.</p>

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>adverse community and economic impact</p> <ul style="list-style-type: none"> • Creation of new routes in and out the village would further congestion • Impact on highway safety due to new accesses • Highway safety for cars, cyclists and pedestrians due to poor visibility • Roads would have a 20mph speed limit • Knowsley Lane would become a motorway • No Traffic Impact Assessment has been carried out • Council should carry out an official traffic survey, to assess the impact of the proposal on the volume of traffic 	
<p>Safeguarded Land - Knowsley Village – Flora and Fauna</p>	<p>Site is home to a variety of flora and fauna, including stoats, squirrels, pheasants, partridge, mallards, lapwings, heron, French partridge, wood pigeon, buzzards, kestrel, owls, rabbits, foxes, birds of prey, the fish pond, colonies of bats (protected species), moles, shrews, hedgehogs, rats, mice and insect life. Species are interdependent on each other to create a balanced ecology. Proposal is a blatant act of wildlife vandalism</p> <p>Question what are the plans for collection, relocation or conservation for species.</p> <p>Lack of thrushes and finches in the local area is</p>	<p>Habitats for flora and fauna have been considered as part of all of the proposed SUEs. Key biodiversity assets have been protected through the approach to the selection of appropriate SUE locations, and the identification of the developable areas within these locations. Any impacts on flora and fauna and their habitats will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS8 and CS19, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>thought to have started with the spread of the industrial estate.</p> <p>No Environmental Impact Assessment or Ecology Survey has been carried out to ascertain the effect of the development. Environmental impact assessment is required to assess potential effects on wellbeing of residents, environmental pollution, flooding and established wildlife habitats.</p>	
<p>Safeguarded Land - Knowsley Village – Flooding</p>	<p>Concern about the impacts of potential future development of the Knowsley Village site on flooding in the area, including:</p> <ul style="list-style-type: none"> • The area has been subject to areas of flooding the past. Ormskirk Road floods regularly, and this would increase with the removal of Green Belt • Existing drainage network is insufficient and below capacity for existing flows • The main sewer system would not be able to cope and would overflow • The area would need a lot of work, including a complete new drainage system • No drainage analysis has been carried out to predict the effect of increased outflows will have on both the existing and adjacent networks 	<p>According to the Environmental Agency Flood Maps (November 2014), no areas of the safeguarded land in Land at Knowsley Village are within Flood Zones 2 and 3. Consequently there is no reason to suggest that flood risk would preclude delivery of development, necessitate a specific design of scheme within the safeguarded land or result in any increased flood risk to neighbouring properties.</p> <p>In accordance with NPPF paragraph 85, safeguarded land is not allocated for development at the present time and planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development. A more detailed site-specific Flood Risk Assessment will be likely to be required for the site prior to development taking place. Appropriate mitigation works, where necessary, will be identified through this process, including consideration of issues such as surface water and drainage.</p>

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Safeguarded Land - Knowsley Village – Infrastructure	<p>Concern about the impact of potential future development of the Knowsley Village site on infrastructure provision, as current infrastructure cannot sustain extension to the village including schools, shops, doctors, nurseries, dentists and play areas. There are already issues with accessing doctors, nurseries and schools. Children have always had to travel out of the area to secondary schools. Any development would have a detrimental impact on social infrastructure.</p> <p>Knowsley Village is not well served by public transport. Bus services are at certain hours very poor and buses are busy at peak hours. The development of the site would not reduce carbon emissions, reduce the need to travel, and will not recognise environmental limits of the area.</p> <p>Question deliverability of infrastructure improvements, as there is a lack of funding availability due to government cuts. There wouldn't be any more extra public transport, as there haven't seen any improvements in the past. Development would cause disruption by demanding that existing infrastructure is renewed.</p>	<p>Infrastructure provision has been considered as part of all the proposed SUEs and safeguarded land. Following liaison with a range of infrastructure providers, there have been no significant issues identified in ensuring that SUEs and safeguarded land can be served by appropriate infrastructure, including schools and doctors. For some sites, on or off site infrastructure improvements may be necessary as a result of development.</p> <p>The safeguarding of the land means it is not allocated for development at the present time and planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development.</p>

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	There may be a better bus service and other things this village misses out on like roads and pavements getting resurfaced	
Safeguarded Land - Knowsley Village – Air Quality	Aspects of Knowsley Village are highly polluted; adding 1000 homes and cars will exacerbate this issue. The development of the site will have a major impact on air quality and sustainability.	Knowsley currently has no Air Quality Management Areas designated. Through the identification of the SUEs, there have been no issues raised in terms of a particular risk to air quality as a result of new development. The potential for impacts on air quality arising from development will be assessed as part of planning applications, in accordance with Policy CS2, alongside the SUE policies.
Safeguarded Land - Knowsley Village – Impacts on Adjacent Areas	<p>The area around the proposed safeguarded land and potential development site will be subject to impacts, including:</p> <ul style="list-style-type: none"> • Impact of proposals would be negative on residents • There would be a loss of much loved countryside and greenspace • There will be a loss of view for residents • There will be a loss of property value due to the greater availability of property in the area • Development would drive large business owners away from their homes on Ormskirk Road • The impression of Lord Derby’s estate through the hedgerow on Ormskirk Road would be lost 	<p>These concerns are acknowledged. However, there is no evidence to suggest that appropriately designed new development would cause significant harm to the quality of life of existing residents to an extent which renders the KLPCS unsound.</p> <p>In addition, the safeguarding of the land means it is not allocated for development at the present time and planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development.</p>

26 SAFEGUARDED LAND - KNOWSLEY VILLAGE

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • There are no opportunities to screen the site from the Village • A lot of people enjoy going for a walk about the village and will not be able to due to the amount of cars and traffic • The area currently doesn't have lots of trouble, it's a quiet place and residents want it to stay that way • Large groups of newcomers being housed in one area would have effects on local integration • There will be an increase in crime with influx of people from other areas • Problems arising in the construction period, subject to existing residents to excessive disruption, noise, pollution, service interruption and delays 	

27 OTHER SITES

27 Other Sites

- Other Sites – Shrogs Farm
- Other Sites – Land at Greensbridge Lane, Tarbock Green
- Other Sites – Academy Business Park
- Other Sites – Flukers Brook Farm
- Other Sites – Weston House, Halewood

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Other Sites – Shrogs Farm	<ul style="list-style-type: none"> • Land at Shrogs Farm is identified by the Council’s Strategic Flood Risk Assessment as ‘not susceptible to ground water flooding’ and 97% of the site is suitable for less vulnerable developments. • The evidence indicates that Shrogs Farm could assist the delivery of large scale distribution / logistics • Suggested additional wording for Policy SUE 1 (clause 3) to include reference to the release of Shrogs Farm from the Green Belt and designation as a SUE 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council’s approach to be sound (Examination library reference EX26 and EX34) and also identified no suitable alternatives to the SUEs.</p> <p>The Study rejected the land in the vicinity of Shrogs Farm as it is within an “Essential Gap” between two settlements. The release of this area of land would therefore be in conflict with national Green Belt policy.</p>
Other Sites – Land at Greensbridge Lane,	<ul style="list-style-type: none"> • Allowing the development of land at Greensbridge Lane will prevent area the northern parcel of the East of Halewood 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust</p>

27 OTHER SITES

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Tarbock Green	<p>SUE (which is productive farmland) from being required.</p> <ul style="list-style-type: none"> • The site could be self-build site which is inline with Government aspirations • The site would utilise redundant agricultural land and assist the development of the rural community at Tarbock Green • The site is not currently in use and contributes little to the local economy • The boundaries of the site are identified by a mixtures of trees, hedgerows and a watercourse • The proposal could boost the local economy by constructing 80-100 dwellings • The site has potential to create a sustainable community and deliver large executive homes 	<p>evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34) and also identified no suitable alternatives to the SUEs.</p>
Other Sites – Academy Business Park	<ul style="list-style-type: none"> • The site is located within a 'gateway' location and provides an opportunity to contribute to the local economy • Agreement that a 'services hub' should be located within Knowsley Industrial and Business Parks, but there is little justification for it to be located on South Boundary Road • The location of the 'services hub' should be delegated to the Local Plan: Site Allocations and Development Policies document. • Academy Business Park could provide 	<p>No soundness and legal compliance issues arising.</p> <p>The proposal in the KLPCS of providing a services hub at South Boundary Road would ensure close links to the existing Admin Road local centre which serves the Knowsley Industrial Park. South Boundary Road remains the priority location for shopping and services to meet local needs within the Industrial Park in Policy CS11.</p> <p>Academy Business Park is not a more appropriate location for local shopping and services given it is in an out of centre location, and noting its proximity to an existing local centre outside the Industrial Park (Broad Lane / Park Brow Drive)</p>

27 OTHER SITES

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>suitable locations for small scale shopping / services to serve the needs of nearby employees. The location is sustainable, visible and sequentially preferable to the South Boundary Road site</p> <ul style="list-style-type: none"> • Provision for shopping / services within the site would not prejudice the wider redevelopment of the site for B8 (warehousing and distribution) uses 	<p>and Kirkby Town Centre.</p>
Other Sites – Flukers Brook Farm	<ul style="list-style-type: none"> • If land to the north-west and south-west of Knowsley village were used instead of the Council’s safeguarded site there would be less disruption for the residents of the village 	<p>All SUE sites and safeguarded land have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council’s approach to be sound (Examination library reference EX26 and EX34) and also identified no suitable alternatives to the SUEs and safeguarded land.</p>
Other Sites – Weston House, Halewood	<ul style="list-style-type: none"> • Include Weston House within Policy CS5 (clause 1) to provide greater flexibility in the Plan • The Weston House site does not have a critical role in fulfilling the purpose of including land in the Green Belt • The site could be developed without any significant impact on the integrity of the Green Belt 	<p>All SUE sites and safeguarded land have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council’s approach to be sound (Examination</p>

27 OTHER SITES

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Sites with greater more importance to the Green Belt purposes than the Weston House site are proposed for removal from the Green Belt • The decision of not include Weston House in the Plan is inconsistent with decisions in relation to planning approvals at Bank Lane, Kirkby and at an adjacent site • The site is readily available and deliverable and could balance any shortfalls due to the delayed delivery of larger sites 	<p>library reference EX26 and EX34) and also identified no suitable alternatives to the SUEs and safeguarded land.</p>

28 POLICY CS15

28 POLICY CS15

- Policy CS15: Affordable housing - requirements
- Policy CS15: Affordable housing - delivery

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
<p>Policy CS15: Affordable housing - requirements</p>	<p>Support for:</p> <ul style="list-style-type: none"> • The amendment made to clause 1 which reduces the provision of affordable housing sought within the urban area to 10%. • Conclusion that there is generally a higher level of development viability in the proposed SUEs and therefore a higher rate of 25% affordable housing is generally acceptable within the SUEs. • Recognition that viability will also be a key consideration for any individual case as set out at paragraph 7.6. <p>General comment:</p> <ul style="list-style-type: none"> • Consider that the existing housing mix in the area should be considered when assessing the amount and tenure of affordable housing in order to assist in creating mixed communities. • A number of the proposed SUEs are 	<p>Comments in support of the policy as modified are noted and welcomed.</p> <p>The Inspector has confirmed his view that the Council's approach is sound, in particular the differentiation between targets for affordable housing within urban sites and SUEs and the flexibility introduced into the assessment of tenure mix (see Inspector's Second Interim Findings, Examination library reference EX34). No further modifications are therefore needed. The rationale and justification for the percentage targets for affordable housing is given in the Technical Report: Affordable Housing Policy (Examination library reference TR09).</p> <p>Many of the issues raised relate to the percentage targets for affordable housing. Some responses request that the proposed modification (M169) to Policy CS15 should not be accepted, and that a higher target for affordable housing should be maintained in urban areas. The Council has reduced the target for urban areas from 25% to 10% to better reflect evidence of development viability in such areas.</p>

28 POLICY CS15

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>adjacent to areas dominated by social rented properties and therefore in some instances it may be preferential for a development to provide a higher level of private, low cost for sale units to balance the housing market.</p> <ul style="list-style-type: none"> • This area is socially deprived; releasing Green Belt for yet more social housing is not going to increase revenue for the Council. <p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • The proposed policy requirement for Sustainable Urban Extensions (i.e. the distinction of 25% as opposed to 10% in the current urban area introduced by proposed modification M169) has not been properly justified by viability evidence and therefore does not accord with national policy. • The Knowsley EVA fails to undertake the type of exercise required by national policy to justify an affordable housing target. Tables at pages 186 to 188 (of the EVA) only examine the impacts of individual policy requirements, and no conclusions are reached about the cumulative impact of the policy requirements. • If the impacts of individual policies in Tables 7.30 to 7.32 (of the EVA) are added together, it is clear that a 25% affordable housing 	<p>Other responses seek further modifications which would introduce a further reduction in the affordable housing target. These arguments have already been considered at the previous hearing sessions. No further reductions are needed as the suite of policies within the Core Strategy already offer sufficient flexibility to developers who consider that the affordable housing targets cannot be delivered due to economic viability. This includes Policy CS27, which provides guidance on the prioritisation of developer contributions in circumstances where economic viability is proved to be challenging. This reflects the Council’s acknowledgement that there could be circumstances in which development costs are higher, and hence developer contributions towards affordable housing may not be deliverable without viability being affected. Evidence for this approach is set out in the Technical Report: Developer Contributions (Examination library reference TR08).</p>

28 POLICY CS15

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>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.</p> <ul style="list-style-type: none"> • The Core Strategy does not propose developing the Sustainable Urban Extensions at the unrealistically high density of 40 dwelling per hectare which is the alternative figure in the EVA. • EVA case study takes no account of the introduction of zero carbon homes in 2016 which will significantly increase construction costs. If Zero Carbon Homes (roughly equates to Code Levels 5/6), is added the proposed development would be unviable as none of the larger sustainable urban extensions are likely to begin significant housing construction before 2016. • EVA case study does not make an adequate allowance for likely infrastructure costs - a total infrastructure cost for the case study of £8,090 per dwelling is applied compared to the Mott MacDonald report for the South of the Whiston proposal showing infrastructure an average of £8,500 per dwelling (for 1,800 dwellings). • Other very significant infrastructure costs for the South of Whiston proposal which have not been costed by Mott MacDonald, 	

28 POLICY CS15

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>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. 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. Such a level of infrastructure costs would not be viable with a requirement for 25% affordable housing.</p> <ul style="list-style-type: none"> • 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 forward for development. • Disagree with modification - an affordable housing target of 25% should be applied to any development which takes place (mentioned in context of Halewood). • Totally opposed to the reduction in affordable housing target from 25% to 10%. • The reduced level of affordable housing can only be in favour of developers, government guidelines call for a level of 25%. 	
Policy CS15: Affordable	The plan is unsound and not legally compliant because:	Policy CS15 includes provision for affordable housing within Sustainable Urban Extensions. The policy allows for the

28 POLICY CS15

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
housing - delivery	<ul style="list-style-type: none"> • Affordable housing will not be for the local community or affordable to local people. <p>Recommendation:</p> <ul style="list-style-type: none"> • Need to ensure plans (Sustainable Urban Extensions) include affordable housing for sale and rent. 	<p>provision of both social rented housing and intermediate housing. The Council's intention is to ensure that this provision, alongside other affordable housing provision (e.g. through the Affordable Homes Programme) will provide affordable housing options which will benefit Knowsley's communities.</p>

29 POLICY CS17

29 POLICY CS17

- Policy CS17: Building Standards

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS17: Building Standards	<ul style="list-style-type: none">• Support the deletion of the requirement to achieve Code for Sustainable Homes, BREEAM and decentralised renewable and low carbon energy systems and the removal of the requirement to achieve Building for Life and Lifetime Homes. These requirements cannot be justified and could adversely affect deliverability and viability of new development (M179, M183, M208, M209, M210, M212, M215, M217)	Comment noted - no response required.

30 POLICY CS20

30 POLICY CS20

- Policy CS20: Protection of historic assets

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS20: Protection of historic assets	<ul style="list-style-type: none"> • Objection to modification to Policy CS20 (clause 1b) as it removes the need for proposals to have regard to setting • The modification weakens the protection given to heritage assets and does not comply with the NPPF (para 132) • The modification is also contrary to the 1990 Act, specifically the requirement for 'special regard' should be given to the preservation of the setting of historic assets 	<p>In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26).</p> <p>Modifications M193 and M194 were prepared specifically to improve consistency with NPPF paragraphs 131 - 135.</p> <p>Policy CS20 clause 1(a) requires appropriate integration with the setting of a Listed Building, which therefore suggests that it could reasonably be considered to relate to the substantial harm test within clause 1(b). Such an approach is consistent with NPPF paragraph 132.</p> <p>The approach within Policy CS20 is not contrary to the Listed Building and Conservation Area Act 1990, as Section 16(2) requiring 'special regard' is a matter for decision making rather than policy preparation. In any case Policy CS20 (as amended) provides an appropriate approach to the Borough's historic environment which facilitates the ability to have 'special regard' in decision making.</p>

31 POLICY CS21

31 POLICY CS21

- Policy CS21: Greenspace and Trees - inconsistency of Green Belt release

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
<p>Policy CS21: Greenspace and Trees - inconsistency of Green Belt release</p>	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • The release of Green Belt means that the objectives of this policy cannot be met. 	<p>In his Interim Findings, the Inspector has found the Council's approach to green infrastructure and greenspaces and trees to be sound (Examination library reference EX26).</p> <p>The Technical Report: Sustainable Urban Extension (TR07) establishes that developable areas of SUE sites (and safeguarded land) has notional capacities which reflect areas of valuable public open space and outdoor sports provision. In addition, the appropriate protection of identified outdoor sporting provision and Local Wildlife Sites is provided for through existing allocations alongside the SUE allocation that are not sought to be altered, with the notional capacity including deductions for these areas. Related matters such as tree, habitat and environment protection are provided by other policies in the KLPCS.</p> <p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). There are five purposes of Green Belt identified at NPPF paragraph 80 which clearly demonstrate that the value of such areas is much broader than access or outdoor recreational benefits.</p>

32 POLICY CS22

32 POLICY CS22

- Policy CS22: Removal of Standards – Objection
- Policy CS22: Removal of Standards – Sustainability
- Policy CS22: Removal of Standards – Support
- Policy CS22: Viability

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS22: Removal of Standards – Objection	<p>The removal of the requirement to achieve a certain Code for Sustainable Homes standards is objected to, due to:</p> <ul style="list-style-type: none"> • It will mean there is a reduced level of certainty that proposed SUEs would have a positive impact on objectives relating to poverty, deprivation and health • It goes against the Council’s green credentials and is a bizarre decision particularly due to the threat of climate change, and increased demands on energy, water and other resources • It will increase energy usage. • The affect on the ability to reduce the carbon footprint of a household 	<p>The rationale for the proposed modification which removes reference to sustainable construction standards is to ensure that the Plan reflects national policy, and the move to incorporate sustainable building standards in statutory Building Regulations. This also reflects the lack of evidence at a local level to justify sustainable construction targets above the national minimum. The Inspector has confirmed that the Council’s approach to sustainable construction is sound (see Inspector’s Second Interim Findings, Examination library reference EX34).</p>
Policy CS22: Removal of Standards - Sustainability	<p>The need to build more sustainable housing within a limited supply of land means that innovation is necessary but delivery of sustainable communities relies on more than achievement of zero carbon</p>	<p>In his Interim Findings, the Inspector has found the Council’s approach to be sound (Examination library reference EX26 and EX34).</p>

32 POLICY CS22

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>housing – need also to select appropriate locations for development.</p> <p>In addition to housing there are numerous other issues that contribute to the carbon footprint of UK households, e.g. construction and maintenance. Knowsley Council will not meet targets for the reduction of greenhouse gases</p>	<p>Sustainable construction standards are being transferred to the statutory Building Regulations. Given that development will need to comply with these regulations, the policy approach in Policy CS22 is considered to provide a flexible and consistent approach which also reflects the requirements of NPPF paragraph 173.</p>
<p>Policy CS22: Removal of Standards - Support</p>	<p>Support the removal of the part of the policy relating to Sustainable Construction Targets (M210).</p> <p>Acknowledge that the Government intends to abolish the Code for Sustainable Homes and that some aspects of sustainable design are expected to be covered in the Building Regulations. Support for the inclusion of new paragraph 9.7A which states that the Council will consider the need for some aspects of sustainable design to be defined by local policies. Endorse the incorporation of water efficiency measures as part of the design process for all new developments.</p>	<p>Noted, comments welcomed.</p>
<p>Policy CS22: Viability</p>	<p>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.</p>	<p>Sustainable construction standards are being transferred to the statutory Building Regulations. Given that development will need to comply with these regulations, it is not appropriate for the Plan to incorporate flexibility about meeting these standards.</p>

33 POLICY CS24

33 POLICY CS24

- Policy CS 24: climate change
- Policy CS 24: flood risk at South of Whiston & Land South of M62 SUE
- Policy CS 24: flood risk evidence base
- Policy CS 24: engagement with United Utilities
- Policy CS 24: use of brownfield sites
- Policy CS 24: insurance liability

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS24: climate change	<ul style="list-style-type: none"> • Climate change is already causing heavier downpours and that trend is anticipated to increase food 	<p>In his Interim Findings, the Inspector has found the Council's approach to managing flood risk to be sound (Examination library reference EX26 and EX34).</p> <p>The approach of Policy CS24 is consistent with the objectives of the NPPF in seeking to meet the challenge of climate change and flood risk, alongside other complimentary policies within the KLPCS.</p>
Policy CS24: flood risk at South of Whiston & Land South of M62 SUE	<ul style="list-style-type: none"> • Main drains may not be able to handle rainfall due to areas of hard standing within the proposed developed site and increased rainfall • The development of the site may cause the M62 to flood • The impact of dwellings at South of Whiston need to be considered in the context of flood zones 	<p>The extent of flood risk has been considered as part of all of the proposed SUEs. The Green Belt Study (Examination library reference EB08) outlines how flood risk issues have been considered in relation to the selection of Green Belt locations. Within the Strategic Flood Risk Assessment (Level 2) (Examination library reference EB15), areas within the Land to the South of M62 have been identified as being Flood Zone 2 (9.3 hectares or 12%) with a reduced area of this also being Flood Zone 3 (6.7 hectares or 9%). The findings of the</p>

33 POLICY CS24

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Properties at Foxshaw Close and Windy Arbor Close and the Green Belt to the rear of the properties are subject to a high water table. Development in this vicinity will influence the high water table and increase the risk of flooding • There are a number of watercourses in the vicinity of the site which drain into a low lying area to the east of the A5300 	<p>SFRA (Level 2) have been accepted by the Environment Agency. A more detailed site-specific Flood Risk Assessment will be required for the site prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p> <p>According to the Environmental Agency Flood Maps (November 2014), no areas of the South of Whiston SUE are within Flood Zones 2 and 3. Consequently there is no reason to suggest that flood risk would preclude delivery of development, necessitate a specific design of scheme within the SUE or result in any increased flood risk to neighbouring properties. A more detailed site-specific Flood Risk Assessment will however be required for the site prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process, including consideration of issues such as surface water and drainage.</p>
Policy CS24: flood risk evidence base	<ul style="list-style-type: none"> • The proposed modifications may compromise the Council's flood risk assessment • Strategic Flood Risk Assessments need to be completed to identify areas at risk of flooding within the site 	<p>In his Interim Findings, the Inspector has found the Council's approach to managing flood risk to be sound (Examination library reference EX26 and EX34).</p> <p>The policy approach and proposed modifications have been informed by evidence relating to flood risk, including the Strategic Flood Risk Assessment (Level 2) (Examination</p>

33 POLICY CS24

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>library reference EB15), which identifies areas at risk of flooding within sites, where such risk exists. The findings of the SFRA (Level 2) have been accepted by the Environment Agency. A more detailed site-specific Flood Risk Assessment will be required for each site affected by flood risk, prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
<p>Policy CS24: Engagement with United Utilities</p>	<ul style="list-style-type: none"> No indication has been given as to the capacity of United Utilities to provide water and sewerage treatment for the proposed development at South of Whiston. 	<p>Infrastructure provision has been considered as part of all the proposed SUE sites and Safeguarded Land. Following liaison and consultation with a range of infrastructure providers (including United Utilities), there have been no significant issues identified related to the delivery of SUE sites being served by appropriate infrastructure. For some sites, on or off site infrastructure improvements may be necessary as a result of development and these will be assessed at the planning application stage in accordance with Policy CS27, alongside the SUE policies.</p>
<p>Policy CS24: use of brownfield sites</p>	<ul style="list-style-type: none"> To prevent flooding issues the Council should ensure that brownfield sites are development before considering Green Belt release 	<p>In his Interim Findings, the Inspector has found the Council's approach to managing flood risk to be sound (Examination library reference EX26 and EX34).</p> <p>Flood risk is a constraint which on a site by site basis can impact upon brownfield, greenfield and Green Belt. Policy CS24 is therefore considered to provide an appropriate policy approach which is consistent with the NPPF and can be</p>

33 POLICY CS24

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		applied through decision making to all types and locations of development.
Policy CS24: insurance liability	<ul style="list-style-type: none"> • The Council has not guaranteed compensation for potential flood damage / inconvenience. Confirmation of this should be provided to residents for insurance purposes • Information regarding flood risk has not been provided to developers or the Council's planning and building control departments 	<p>In his Interim Findings, the Inspector has found the Council's approach to managing flood risk to be sound (Examination library reference EX26 and EX34).</p> <p>Policy CS24 provides an appropriate policy approach which is consistent with the NPPF and can be applied through decision making to all types and locations of development. This prioritises areas with a low probability of flooding, and in areas of medium and high flood risk (or a development of above 1 hectare) a detailed site-specific Flood Risk Assessment will be required for each site affected by flood risk, prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process. Consequently there is no reason to suggest that any flood damage would occur as new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted.</p> <p>The policy approach has been informed by evidence relating to flood risk, including the Strategic Flood Risk Assessment (Level 2) (Examination library reference EB15), which identifies areas at risk of flooding within sites, where such risk exists. The findings of the SFRA (Level 2) have been accepted by the Environment Agency. A more detailed site-specific Flood Risk Assessment will be required for each site</p>

33 POLICY CS24

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>affected by flood risk, prior to development taking place, and will be assessed as part of planning applications for new development, in accordance with Policy CS24, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p> <p>The Council's decision making regarding flood risk is informed by the latest flood maps published and updated by the Environment Agency at least annually.</p>

34 POLICY CS25

34 POLICY CS25

- Policy CS25: Proposed modification M225

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS25: Proposed modification M225	Modification supported by Coal Authority.	Noted, comments welcomed.

35 POLICY CS27

35 POLICY CS27

- Policy CS27: Infrastructure Delivery Plan
- Policy CS27: Highways
- Policy CS27: Water Infrastructure
- Policy CS27: Viability
- Policy CS27: Proposed modification M231

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Policy CS27: Infrastructure Delivery Plan	<p>Various issues were raised about the role and content of the Infrastructure Delivery Plan (IDP), including:</p> <p>Support for the addition of paragraph 10.9 which relates to revisions to the IDP being made open for public consultation (M239).</p> <ul style="list-style-type: none"> • Support for the addition of paragraph 10.10A which requires that new development proposals have regard to the content of the IDP. The importance of the highways network and strategic road network should be highlighted within the IDP. • Validity of the IDP is questioned, due to the short timeframe which the Council has had to prepare or modify the IDP • Risk and mitigation factors have not been properly accounted for – statements make clear that the IDP has not been properly thought through 	<p>Noted comments in support of proposed modifications, these are welcomed.</p> <p>Ensuring the delivery of infrastructure to support new development is recognised as a priority. The IDP has a central role in this, and the need to update this regularly in consultation with stakeholders and subject to public consultation is recognised within paragraph 10.9 of the Plan.</p> <p>The Council also intends to produce a Developer Contributions SPD, which will set out further policy guidance about the negotiation of contributions towards infrastructure in accordance with Policy CS27.</p>

35 POLICY CS27

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Biggest risk to the IDP is that the landowners/developers refuse to pay for new infrastructure requirements, and hence hold the Council to ransom – this could impact on housing delivery, or could result in the Council having to bear a larger proportion of the infrastructure development costs. • The IDP should be reviewed to account for the fact that the planning and paying for new infrastructure is a more arduous and complex task than implied in the policy, particularly with regard to developer contributions 	
Policy CS27: Highways	Policy CS27 and its various provisions, alongside other policies, will ensure that detailed consideration is given to the strategic road network during subsequent stages of the planning process	Comments noted – welcomed.
Policy CS27: Water Infrastructure	United Utilities will seek to work with the Council to identify any infrastructure issues and appropriate resolutions throughout the development of the Local Plan. It is important to incorporate water efficiency measures / infrastructure as part of the design process for all new developments.	Comments noted – welcomed.
Policy CS27: Viability	Support the removal of the clause of Policy CS27 which relates to the payment towards independent scrutiny of submitted viability evidence (M235).	Comments noted – welcomed
Policy CS27: Proposed modification M231	Support the modification to Policy CS27 (M231) but suggest additional wording to add clarity and support the provision and protection of cultural infrastructure.	Table 10.1 specifically identifies cultural infrastructure. The current policy wording, as modified, has sufficient protections for existing cultural infrastructure. The additional suggestions do not materially affect the soundness of the Plan.

36 APPENDIX D

36 APPENDIX D

- Appendix D – delivery

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Appendix D - delivery	<ul style="list-style-type: none">• Strategic Objectives are not considered to be SMART. The outputs are not measurable and therefore cannot be seen as achievable.	In his Interim Findings, the Inspector has found the Council's approach to monitoring (as modified) to be sound (Examination library reference EX26 and EX34).

37 SUSTAINABILITY APPRAISAL

37 SUSTAINABILITY APPRAISAL

- Sustainability Appraisal - General
- Sustainability Appraisal - Employment
- Sustainability Appraisal - Retail
- Sustainability Appraisal - Green Belt release
- Sustainability Appraisal - Affordable housing
- Sustainability Appraisal - Highways
- Sustainability Appraisal - Flora and fauna
- Sustainability Appraisal - Infrastructure
- Sustainability Appraisal - Impact on adjacent areas

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
Sustainability Appraisal - General	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Proposed modifications are contrary to the conclusions of the Sustainability Appraisal report. • The Council’s philosophy about new housing contributing to economic development and population retention is fundamentally flawed. • Para 5.159 (document SD32) - conclusion of no anticipated negative effects upon sustainability objectives arising from proposed modifications is unproven given detrimental impact upon climate change. • Paras 5.183 and 5.184 (document SD32) - 	<p>The sustainability appraisal is an iterative process to promote sustainable development within the Local Plan by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. Sustainability appraisal has been an integral part of the preparation and development of the KLPCS, to identify how sustainable development is being addressed and has been undertaken independently at each stage of plan preparation (Examination library reference: SD07, SD07a, SD08, SD08a, SD09, SD09a, SD10, SD10a, SD10b, SD28, SD28a, SD28b and TR07). The Sustainability Appraisal reports help to integrate different areas of evidence and to demonstrate why the proposals in the Local Plan are the most appropriate.</p>

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>removing the need for Code for Sustainable Homes / BREEAM standards undermines the Council's green credentials. Will create a greater demand for energy, water and other resources and have a negative effect on the objective to mitigate climate change. Completely at odds with other statements and shows a negative effect on objectives relating to poverty, deprivation and health.</p>	<p>In evaluating the Local Plan in terms of environmental, economic and social objectives, the Sustainability Appraisal reports consider the range of positive and negative impacts. As such, negative impacts are often unavoidable in circumstances where development is required. Consequently negative impacts acknowledged within the Sustainability Appraisal documents do not imply that the Local Plan is unsound, rather that such impacts in sustainability terms must be considered against reasonable alternatives. Where the policy approach in the KLPCS is considered to be preferential in sustainability terms but negative impacts remain, measures are identified to improve the performance of the policies (where practicable). These are set out in document SD07 (pgs. 80 -83), including reference to instances where the KLPCS was informed by Sustainability Appraisal recommendations and modified accordingly.</p> <p>The Sustainability Appraisal of the proposed modifications (SD32, para. 6.5) affirms that converting all of the 'reserved' locations to SUE site allocations and allowing development early in the plan period (as pursued in the KLPCS) would provide a greater level of certainty that these sites would come forward and therefore increase the likelihood of there being a positive impact on a number of objectives, particularly in the early part of the Plan period, than the reasonable alternatives otherwise discounted by the Council. It also confirms in para. 6.10 that the proposed modifications would not significantly alter the performance of the policies in the SA process (as previously considered and documented).</p>

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		<p>Para.5.159 (document SD32) this relates to proposed modifications M162 (providing certainty of extending town centre boundary) and M163 (simplification of policy approach to Cables Retail Park). Consequently there is no reason to suggest that the conclusion is incorrect, as the modifications do not influence the negative impact previously identified with respect to Policy CS14.</p> <p>The proposed modification to Policy CS22 removing the need for Code for Sustainable Homes / BREEAM standards is to ensure soundness of the approach relative to the Government's expectations. Sustainable construction standards are being transferred to the statutory Building Regulations. Given that development will need to comply with these regulations, the policy approach in Policy CS22 (and associated policies in the KLPCS) is considered to provide a flexible and consistent approach which also reflects the requirements of NPPF paragraph 173.</p>
Sustainability Appraisal - Employment	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> Development that may encourage further investment in the area, sustain local employment and potentially bring new employment into the area is not sound reason for economic development, competitiveness and productivity of business (reference to document KGBS 14, SA 	<p>In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34). It is still considered that the Council has demonstrated exceptional circumstances to justify the release of this and all of the SUE sites from the Green Belt, including identified employment requirements.</p> <p>The proposed new housing within the South of Whiston SUE is complemented by new employment opportunities associated to the neighbouring Land South of M62 SUE. In</p>

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>Objective EC1) given no employment in South of Whiston.</p> <ul style="list-style-type: none"> • Para 3.26 (document SD32) - reduced level of employment land means that the target of job creation must be flawed. • Para 5.44 (document SD32) - any employment gains in the building industry are short term and will have little impact on local employment. 	<p>addition, the South of Whiston SUE is in close proximity to existing employment areas (Whiston Enterprise Park and Huyton Business Park) and has access to wider opportunities via sustainable modes of travel and the adjacent strategic highway network (M62 / M57 / A5300). These benefits accord with the conclusions of para. 5.44 (document SD32).</p> <p>The reduction in the employment target through the proposed modifications reflects a modification to the historic trends methodology, whereby previous loss of employment land is now accounted for in the flexibility of discounted land supply identified rather than the baseline forecast. In this regard, Policy CS4 identifies provision for “at least” 164 hectares to be developed between 2010 and 2028, and therefore does not preclude accommodating higher demands if they arise. No effect therefore results upon levels of job creation anticipated in achieving the KLPCS economic growth objectives.</p>
Sustainability Appraisal - Retail	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Para. 5.156 (document SD32) - broadly agrees with assessment that Prescott Town Centre is run down and irrelevant in retail terms. • Para. 5.157 (document SD32) - major positive impact on the objective relating to protecting and enhancing Knowsley’s built heritage (within Prescott Town Centre) is dependent upon investment and not proven. 	<p>Reference to paragraphs 5.156 and 5.157 (Examination library reference SD32) within consultation responses misinterpret the context and purpose relative to previous Sustainable Appraisal conclusions (i.e. in document SD07) and necessary planning judgements.</p> <p>The Sustainability Appraisal recognises the potential to have a major positive impact on the relevant strategic objectives in the Plan, but reduces the certainty due to evidence within the Economic Viability Assessment which suggests that town centre development is generally unviable in current market conditions. However this does not preclude other funding</p>

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
		sources being available beyond the scope of the Economic Viability Assessment and therefore that Policy CS14 is deliverable in the context of NPPF paragraph 173. This is supported by the Inspector's Interim Findings (EX26 and EX34) with regard to soundness.
Sustainability Appraisal - Green Belt release	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Sustainability Appraisal of Knowsley Local Plan: Core Strategy Proposed Modifications - September 2014 is unsound and fails to properly examine the impact of SUE2c on the Environment objectives E.2 as follows: <ul style="list-style-type: none"> a) Does not take account of a number of national studies and best practice from national bodies relative to retaining urban Green Belt land and conservation of priority habitats. b) Does not take into consideration that the loss of Green Belt in this area, the 6th most deprived borough in the UK, will have on the surrounding community (within Whiston). c) Release of land will have a detrimental impact on the local wildlife, well-being, air quality and impact on climate change. d) Timing of habitat survey in October is 	<p>All SUE sites have been assessed in terms of their Green Belt role and function as part of the Green Belt Study (Examination library reference EB08) and Technical Report: Green Belt (TR03). All site selections have been on the basis of robust evidence (as summarised in Council Statement CH05B). Any soundness issues raised have been considered within this process or at earlier stages of Plan preparation. In his Interim Findings, the Inspector has found the Council's approach to be sound (Examination library reference EX26 and EX34).</p> <p>With regard to habitat assessments, the evidence supporting the KLPCS is robust and proportionate for the purposes of SUE and safeguarded land allocations. Any specific impacts on flora and fauna and their habitats will be further assessed through appropriate assessments as part of the master planning process and when planning applications are received for new development, in accordance with Policies CS8 and CS19, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p> <p>The stated conflicts against Sustainability Appraisal objectives do not take account of the significant evidence which informed the preparation of the KLPCS, together with its range of</p>

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>not sound – many species are dormant or in hibernation, and desktop nature of survey is not adequate.</p> <ul style="list-style-type: none"> • Conflicts with the following SA objectives as follows: <ul style="list-style-type: none"> a) S1 - no evidence that the proposals will benefit local trade. b) S2 – building (in Whiston) will not improve amenities it will place pressure on those existing. c) S3 - population growth will increase costs for services such as policing. d) S4 - no contribution to improving community decision making. e) S5 - no consideration of pressure on NHS services and impact on health. f) S7 - no certainty of training opportunities. g) S8 - ancient woodland and lakes are included in development proposals – they should be protected. h) E1 - no longer have access to the landscape and countryside - remainder of Green Belt is on the Derby Estate which is private property with little access. i) E2 - cannot be justified. j) E3 - no record of Knowsley Council 	<p>policies, objectives, expectations relating to employment, housing, retail and service provision, Green Belt, green infrastructure / environment, flood risk, climate change and infrastructure. These points do not appear to raise any soundness or legal compliance issues. The conclusions within the independently prepared Sustainability Appraisal reports are robust.</p> <p>Reference to specific paragraphs in the Sustainability Appraisal (Examination library reference SD32) within consultation responses misinterpret the wider context and purpose relative to previous Sustainable Appraisal conclusions (i.e. in document SD07) and necessary planning judgements made in preparing the KLPCS. The specific thematic issues on matters such as Green Belt, etc and specific sites such as South of Whiston are addressed separately in this document.</p>

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>accessing EA flood records</p> <p>k) E4 - evident that Knowsley Council believes that it will not meet its target for green house gas reduction if development and Green Belt goes ahead.</p> <p>l) E5 to E11 - no evidence of positive effect.</p> <p>m) EC1 - little investment being put into these areas, starting to look tired and unkempt.</p> <p>n) EC2 - attempts to revitalise Prescott Town Centre have failed, in no way it would attract people to the area leaving the proposed estate (South of Whiston) with little interest.</p> <p>o) EC3 - insufficient jobs from the occasional job, housing would be unaffordable.</p> <ul style="list-style-type: none"> • Para. 3.20 (document SD32) - question how removing Green Belt can have a positive impact upon a range of objectives, particularly those relating to landscape character and accessibility; biodiversity and adapting to climate change. • Para. 3.21 (document SD32) - inconsistency of conclusions - how can the statement in relating to the uncertain impact of CS1 and CS5 hold true to statement 3.20 	

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>(document SD32), one is negative and one is positive?</p> <ul style="list-style-type: none"> • Para. 3.23 (document SD32) - actions contained in the Local Plan are identified here (RE: general policy approach plus CS11 and CS13) as uncertain and would certainly fail in meeting our green credentials as the development of Green Belt out of centre would increase carbon impact. • Para. 3.24 (document SD32) - how can this point (RE: general policy approach plus CS15 - 18, CS21, CS22, CS23) be made as positive when the document already highlights the possibility of a negative impact on all of the CS range of reports? • Para 5.44 (document SD32) - a development on this scale (South Whiston and M62) would cause a negative impact on all areas mentioned (social, environmental and economic objectives). • Paras 5.46 and 5.50 (document SD32) – why is it 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. If a large area of this site is going to become a Country Park then why is it necessary to remove it from the Green Belt? No mention of timing and funding for it is in place. 	

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Para 5.47 (document SD32) - clear admission here of taking this area (South of Whiston and Land South of M62) out of the Green Belt. Increase in global commodity prices makes local food production more important – the need to remove Grade 2 BMV agricultural land is not proven and this paragraph highlights the negative impact of this policy. • Para 5.48 (document SD32) - clear admission that the development proposed is identified as having a negative effect on carbon emissions and would certainly fail in meeting our green responsibilities. • Para 5.48 (document SD32) - reinforce the need for a structure approach to any release of Green Belt and more time should be spent understanding all the issues before a decision is taken that cannot be revoked. • Para 5.85 (document SD32) - highlights negative impact upon objectives that relate to landscape character, biodiversity and green infrastructure, and a major negative impact on the protection of land and soil. Due to quantum of development and number of associated vehicle trips, each option could have a negative impact upon the objective relating to air quality and also increase congestion. 	

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Para 5.85 (document SD32) - highlights negative impact upon outdoor activities and recreation for local people. • Para 5.133 (document SD32) - use of Green Belt overwhelmingly opposed by local people. Reason used by Council does not meet the NPPF with regard to the five purposes of Green Belt and extraordinary needs do not exist to remove BMV agricultural land. • Paras 5.134 and 5.177 (document SD32) - rapid release of Green Belt can only benefit developers and will put back development of brown field sites (as admitted by Council at hearings). To release Green Belt early is a poor decision not made in the best interests of local people. • Para 5.135 (document SD32) – proposal to release Green Belt early will impact upon Council’s regeneration objectives. Little in the way of long term employment will come from vast housing estates, only a greater demand on roads, schools, GPs, lowering of air / water quality and increase in noise pollution. • Para 5.136 (document SD32) - query conclusion on appropriate density given the average density of 30 dwellings per hectare is above figures given for South of Whiston SUE. 	

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Para 5.179 (document SD32) - Green Belt release will create precedent encouraging future planning applications. • Para. 5.181 (document SD32) - welcome opportunity to see where Knowsley believe they can get new greenspaces from. • Para. 5.181 (document SD32) - Council overstate positive impact on health, poverty and social deprivation that a vast estate of houses can have. • Document SD32b (pg. 198 - 202) - options for A58 / Whitakers site, preference for retaining playing fields with benefits identified for removing Green Belt as reducing deprivation by stimulating jobs and creating jobs in the construction sector (S1) which might be offset by reduced commercial activity at the nursery. • Document SD32b (pg. 198 - 202) - further negatives of Green Belt release (due to all options resulting in houses being developed on a greenfield site and unless appropriate mitigation measures were implemented could lead to a loss of priority habitat and mature trees) include: <ul style="list-style-type: none"> a) negative effect on the objectives relating to local character of landscape and biodiversity - detrimental to visual amenity. 	

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> b) concerns over traffic undermine Council conclusions that the site has good access and transport links, with easy access to local facilities in walking distance (S2). c) recreational amenities will not be preserved. d) health implications of loss of playing fields. e) increased flood risk. <ul style="list-style-type: none"> • How can bringing 4,000 new residents to an area (South of Whiston), be scored as a minor positive for reduction the overall need for travel (CS Strategic Objective 6 quoted). This is incorrect. • Reference to Strategic Objective 8 (Green Infrastructure and Rural Areas) scored as a minor negative. The report is flawed this should be a major negative – noting that ‘development of this area may have a detrimental effect on this land (which is best and more fertile) coming back into agricultural use in future’. 	
Sustainability Appraisal - Affordable housing	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Para 3.26 (document SD32) - reduced level of affordable housing can only be in the 	<p>Reference to specific paragraphs in the Sustainability Appraisal (Examination library reference SD32) within consultation responses misinterpret the wider context and purpose relative to previous Sustainable Appraisal conclusions (i.e. in document SD07) and necessary planning</p>

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>favour of developers, government guidelines call for a level of 25%.</p> <ul style="list-style-type: none"> • Para 5.44 (document SD32) – with the reduction in affordable housing previously mentioned (para. 3.26) how can the massive addition of over 2,400 houses have a beneficial effect, without considerable investment in infrastructure. 	<p>judgements made in preparing the KLPCS. The Council provided justification for proposed modifications to the affordable housing requirement in Policy CS15 within a statement to the July hearings (CH13C).</p> <p>The Council is seeking appropriate infrastructure improvements to support new development within the KLPCS in particular the SUE policies and policy CS27.</p> <p>In his Interim Findings, the Inspector has identified the Council’s approach to be sound (EX34).</p>
Sustainability Appraisal - Highways	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Para 5.45 (document SD32) - local transport (in Whiston) is very poor and has seen a reduction in buses available since deregulation including a lack of evening services. Naïve and misleading to suggest building a large number of houses will increase local transport • Para 5.45 (document SD32) - local shopping centre (Greenes Road) is log jammed at busy times with cars, deliveries and drivers shortcutting to Tarbock Island. • Para 5.48 (document SD32) - mention of a significant number of vehicular trips bears out our belief that there would be a serious 	<p>Reference to specific paragraphs in the Sustainability Appraisal (Examination library reference SD32) within consultation responses misinterpret the wider context and purpose relative to previous Sustainable Appraisal conclusions (i.e. in document SD07) and necessary planning judgements made in preparing the KLPCS.</p> <p>Highway provision has been considered as part of the preparation of the KLPCS including the identification of the proposed SUEs and safeguarded land. Following strategic studies (e.g. studies available as Examination library references EB10 and EB11) and liaison with infrastructure providers including the Highways Agency, there have been no significant issues identified in ensuring that the Plan (and the SUEs) can be served by appropriate highway infrastructure. For some sites, on or off site highway works will be necessary, but it is considered that these are best assessed</p>

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<p>impact on traffic congestion (in Whiston).</p> <ul style="list-style-type: none"> • Para 5.84 (document SD32) - local centre (Greenes Road, Whiston) is a small satellite and cannot be expanded; increasing traffic will increase traffic congestion. • Para. 5.138 (document SD32) - contest accuracy of Transport Feasibility Evidence which is out of date. 	<p>and agreed with the developer through either master planning (as appropriate) or at planning application stage in accordance with Policies CS7 and CS27, alongside the SUE policies. The Council places significant emphasis on ensuring that development is safe for pedestrians and vehicles to access, and that it does not cause safety risks off site, as reflected in the prioritisation of highway works within the developer contributions process.</p>
Sustainability Appraisal – Flora and fauna	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Para 5.51 (document SD32) - loss of 100 hectares of open countryside (South of Whiston and land to south of M62) will seriously impact local wildlife. • Para 5.137 (document SD32) - 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 this ecological disaster forward. 	<p>Habitats for flora and fauna have been considered as part of all of the proposed SUEs. Key biodiversity assets have been protected through the approach to the selection of appropriate SUE locations, and the identification of the developable areas within these locations. Any impacts on flora and fauna and their habitats will be assessed through appropriate assessments as part of planning applications for new development, in accordance with Policies CS8 and CS19, alongside the SUE policies. Appropriate mitigation works, where necessary, will be identified through this process.</p>
Sustainability Appraisal - Infrastructure	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Para 5.44 (document SD32) - there are only two local primary schools (in South Whiston), question if they have capacity to cope with the massive development. 	<p>Infrastructure provision has been considered as part of all the proposed SUEs. Following liaison with a range of infrastructure providers, there have been no significant issues identified in ensuring that SUEs can be served by appropriate infrastructure, including schools and doctors. For some sites, on or off site infrastructure improvements may be necessary as a result of development and these will be assessed at the</p>

37 SUSTAINABILITY APPRAISAL

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	<ul style="list-style-type: none"> • Para 5.44 and 5.84 (document SD32) - increase in local population will only put more pressure on what is already stretched NHS provision. 	<p>planning application stage in accordance with Policy CS27, alongside the SUE policies.</p>
Sustainability Appraisal - Impact on adjacent areas	<p>The plan is unsound and not legally compliant because:</p> <ul style="list-style-type: none"> • Impact upon Conservation Area. • Potential to encourage applications for fracking. • Impact upon climate change not adequately considered. • Para 5.51 (document SD32) - no definitive study of water quality provided. • Paras 5.82 and 5.83 (document SD32) - lack of local engagement / consultation in options selection. Proposal is at odds with local public opinion and the Localism bill. • Para. 5.37 (document SD32) - uncertain impact upon archaeological assets within the area will be compromised. • Para. 5.181 (document SD32) - influx of new residents will increase anti-social behaviour. 	<p>These concerns are acknowledged. However, there is no evidence to suggest that appropriately designed new development would cause significant harm to the quality of life of existing residents to an extent which renders the KLPCS unsound. Furthermore the design of development will be subject to detailed requirements in the context of other Local Plan policy requirements relating to sustainable development and preventing impact upon surroundings when a planning application is submitted. Any proposal will be assessed through appropriate assessments as part of planning applications for new development, in accordance with policies in the KLPCS, including the SUE policies.</p> <p>The issues in question relating to consultation and the others specific to Green Belt locations are addressed elsewhere in this report.</p>

38 HABITATS REGULATION ASSESSMENT

38 HABITATS REGULATION ASSESSMENT

- HRA – Habitats Surveys
- HRA – Conclusions
- HRA – Additional Factors

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
HRA – Habitats Surveys	<p>Issues were raised around how the HRA and other habitats survey work has been undertaken, including:</p> <ul style="list-style-type: none"> • It is not sound to conduct a habitat survey in October when many species are dormant or in hibernation • A desktop habitat survey is not adequate to accurately determine the significance of any adverse effects on habitats, conservation and biodiversity • No detailed study of ecology has taken place in recent years • Studies have acknowledged that further work is required to fully identify flora and fauna present • No mention is made of any non-native invasive species e.g. Japanese Knotweed and Himalayan Balsam, which are present 	The evidence supporting the KLPCS is robust and proportionate for the purposes of SUE and safeguarded land allocations. Any specific impacts on flora and fauna and their habitats will be further assessed through appropriate assessments as part of the master planning process and when planning applications are received for new development
HRA – Conclusions	Note that the plan has undergone further stage of HRA to assess the impacts of proposed	The evidence supporting the KLPCS is robust and proportionate for the purposes of SUE and safeguarded land

38 HABITATS REGULATION ASSESSMENT

Theme of Issue	Summary of Issues Raised	Council Comments on this Issue
	modifications on habitats and European sites. The conclusions of this are agreed.	allocations. Any specific impacts on flora and fauna and their habitats will be further assessed through appropriate assessments as part of the master planning process and when planning applications are received for new development
HRA – Additional Factors	Take into account references from specialist organisations and academics within the State of Nature Report with regard to: nature conservation, species decline, access to nature, health benefits of greenspace, the work of environmental charities, climate change and highways, public health.	The evidence supporting the KLPCS is robust and proportionate for the purposes of SUE and safeguarded land allocations. Any specific impacts on flora and fauna and their habitats will be further assessed through appropriate assessments as part of the master planning process and when planning applications are received for new development

For more information log on to
www.knowsley.gov.uk/LocalPlan

You can also get this information in other formats.
Please phone Customer Services on 0151 443 4031
or email customerservices@knowsley.gov.uk

