



Knowsley Council

**Knowsley Local Development Framework
Core Strategy Development Plan Document
Preferred Options: Report of Consultation
December 2011**

CONTENTS

<u>Section</u>	<u>Page</u>
<u>Executive Summary</u>	1
<u>Report</u>	
1. Introduction	6
2. Preparation for Consultation	9
3. Public Consultation Process	17
4. Collecting and Acknowledging Representations	28
5. Analysing Representations	32
6. Results of Consultation – Summary of Main Issues Raised	36
<i>Section A – Written Responses to the Preferred Options Summary Leaflet</i>	39
<i>Section B – Written Responses to the Preferred Options Full Document</i>	49
<i>Section C – Written Responses to the Preferred Options Evidence Base or Supporting Assessments</i>	145
<i>Section D - Petitions</i>	154
<i>Section E – Responses documented at Meetings and Consultation Events</i>	156
7. Lessons Learnt	163
8. Next Steps	166
9. Glossary	170

APPENDICES

- A Statement of Compliance with the Statement of Community Involvement
- B Cabinet Agenda, Agenda Pack and Minutes
- C Publicity Materials
- D Standard Preferred Options Presentation
- E Full List of Respondents
- F Web Link to Report of Consultation (Objective consultation portal)

LIST OF TABLES

- Table 1: Evidence base documents produced for Issues and Options consultation
- Table 2: Additional evidence base documents produced for Preferred Options consultation
- Table 3: Examples of strategies and policies reviewed as part of the Preferred Options consultation
- Table 4: Events and presentations undertaken as part of the Preferred Options consultation
- Table 5: Methods of consultation response
- Table 6: Type of consultee
- Table 7: Question 1 – On the whole, do you agree with the proposals set out in this leaflet?
- Table 8: Question 3 – If you would like to comment on a specific area, please tell us which one
- Table 9: Preferred Policy Option CS1: Spatial Strategy for Knowsley
- Table 10: Preferred Policy Option CS2: Development Principles
- Table 11: Preferred Policy Option CS3: Housing Supply, Delivery and Distribution
- Table 12: Preferred Policy Option CS4: Economy and Employment
- Table 13: Preferred Policy Option CS5: Green Belts
- Table 14: Preferred Policy Option CS6: Town Centres and Retail Strategy
- Table 15: Preferred Policy Option CS7: Transport Networks
- Table 16: Preferred Policy Option CS8: Green Infrastructure
- Table 17: Preferred Policy Option CS9: Principal Regeneration Area – North Huyton and Stockbridge Village
- Table 18: Preferred Policy Option CS10: Principal Regeneration Area – Kirkby Town Centre
- Table 19: Preferred Policy Option CS11: Principal Regeneration Area – Knowsley Industrial and Business Parks
- Table 20: Preferred Policy Option CS12: Principal Regeneration Area – Tower Hill
- Table 21: Preferred Policy Option CS13: Principal Regeneration Area – South Prescott
- Table 22: Preferred Policy Option CS14: Principal Regeneration Area – Prescott Town Centre
- Table 23: Preferred Policy Option CS15: Delivery Affordable Housing
- Table 24: Preferred Policy Option CS16: Specialist and Supported Accommodation
- Table 25: Preferred Policy Option CS17: Housing Sizes and Design Standards
- Table 26: Preferred Policy Option CS18: Accommodation for Gypsies and Travellers and Travelling Show People
- Table 27: Preferred Policy Option CS19: Design Quality and Accessibility in New Development
- Table 28: Preferred Policy Option CS20: Managing the Borough's Heritage
- Table 29: Preferred Policy Option CS21: Urban Greenspaces

- Table 30: Preferred Policy Option CS22: Sustainable and Low Carbon Development
- Table 31: Preferred Policy Option CS23: Renewable and Low Carbon Infrastructure
- Table 32: Preferred Policy Option CS24: Managing Flood Risk
- Table 33: Preferred Policy Option CS25: Management of Mineral Resources
- Table 34: Preferred Policy Option CS26: Waste Management
- Table 35: Preferred Policy Option CS27: Planning for and Paying for New Infrastructure

LIST OF FIGURES

- Figure 1: Photographs from road show events (Kirkby and Halewood)
- Figure 2: Screenshot of the Council Local Development Framework webpage
- Figure 3: Screenshot of the Council Local Development Framework Consultation Portal (Objective)
- Figure 4: Front cover for the summary leaflet and Preferred Options Report
- Figure 5: Preferred Options consultation poster
- Figure 6: Screenshot of Facebook page
- Figure 7: Example of local press article (Knowsley News, June 2011)
- Figure 8: Main stages of Knowsley's Core Strategy preparation (dates subject to review)

EXECUTIVE SUMMARY

The Purpose of this report

- The Preferred Options represents an important stage of consultation on the strategy for the future development of Knowsley, known as the Local Development Framework Core Strategy.
- The Core Strategy Preferred Options report was published in summer 2011 for a period of public consultation.
- This Report of Consultation is being published subsequent to the consultation period. The Report undertakes the following main tasks:
 - Summarises the process involved in preparing and conducting the consultation and its supporting materials
 - Summarises the results of the consultation to feed back to the Council, partners, participants and other stakeholders; and
 - Presents the range of main issues raised for use in subsequent stages of Core Strategy preparation.

Preparation for consultation

- Extensive preparation was undertaken prior to the commencement of the consultation period. This included the following tasks:
 - Review of results of consultation from previous stages
 - Continued collation of evidence
 - Review of impacts of changing legislation and regulations
 - Undertaking of assessments of the Report
- Consultation began with informal internal consultation with key stakeholders and partners
- The Preferred Options Report was then approved by Knowsley Council Cabinet for public consultation purposes
- The consultation period was carefully planned and extensively publicised through a variety of methods, including the distribution of leaflets and posters, press releases and website updates
- It was emphasised that consultation responses needed to be received in writing by the deadline of 5th September.

Consultation process

- Specific consultation bodies and those on the Council's Local Development Framework database were contacted by letter or email regarding the consultation.
- Summary leaflets were circulated to all households, as well as to public buildings including GP surgeries, One Stop Shops and libraries
- All materials were available on the Council's website, including through a specific consultation portal, and selected materials were also made available at Council One Stop Shops and Libraries
- The consultation process involved a range of activities including:
 - Roadshow events in each of Knowsley's main centres
 - Presentations to Town and Parish Councils, Area Partnership Boards and thematic partnerships
 - Presentations to specialist groups such as the Knowsley Older People's Voice

- Use of social networking facilities such as Facebook and Twitter

Results of consultation

- A large number of consultation responses were received through a variety of methods. This is summarised as follows:

Total Number of Individual Comments	Supportive Comments	Non Supportive Comments	Other Comments	Total Comments
Summary Leaflet*	79	111	63	253
Preferred Options Policies	91	65	143	299
Other Elements of Preferred Options Report**	0	0	412	412
Petitions	0	1412	0	1412
Facebook**	0	0	9	9
Total	170	1585	536	2385
*based on responses to the answer of the first question in the leaflet				
**not logged as supportive or non supportive as not relating to policy content				

- A wide variety of comments were made to the consultation. The following table shows broadly how many of these were supportive and non-supportive.

Methods of Consultation Response		
<u>Method of Response</u>	<u>Number of Respondents</u>	<u>Comments Attributable</u>
Online		
Consultation Portal	4 (plus 71 anonymous comments)	88
Email	69	510
Facebook	9	9
Paper		
Letter	48	113
Summary Leaflet Response Form	253	253
Petition Signatories	1412 (6 petitions)	1412
Total	389	2385

Summary leaflet

- 253 responses to the Summary Leaflet were received. Although the number received was comparatively low considering the number of leaflets circulated, the responses gave some interesting feedback on Borough-wide and particularly on local issues.

- When questioned about overall agreement with the proposals outlined in the leaflet, of those answering the question, one third agreed with the proposals, and two thirds disagreed.
- Many comments received related to the following issues:
 - Objection to the preferred approach of utilising Green Belt land to meet future development needs, including objections to specific Green Belt locations identified
 - Support for town centre regeneration, particularly in Kirkby and Halewood
 - Support for the provision of new houses including affordable housing
 - Concern about the status of Prescot Town Centre
 - Questions around distribution of regeneration activity around the Borough
 - Concern about other local non-planning issues e.g. provision of bus services, litter and anti-social behaviour.

Full document

- 117 individual responses were received in relation to the full document (including emails, letters and consultation portal responses). These responses contained 711 individual points relating to the Preferred Options Report, 299 of which related specifically to the policies within the Core Strategy Preferred Options Report. Most policy areas received some response, with some receiving extremely extensive comments in both support and objection. The main issues are summarised as follows:

Spatial Strategy

- Support for efforts to plan for growth in Knowsley, including more jobs and houses
- Support for efforts to enhance and rebalance housing markets with different types, sizes and tenures of new housing
- Emphasis that development of brownfield land should be prioritised over greenfield and Green Belt land
- Concern about the approach to identifying locations for growth (see below)
- Questions around identifying the scale of housing and employment land required to 2027, including in relation to emerging policy and legislation
- Support for greater consideration to be given to providing a range of employment sites and premises

Green Belts

- Questions around the need for release of land in the Green Belt for development, the validity of the approach to the Green Belt Study, the process of selecting preferred locations and the methodology for phasing the release of tiers of sites
- Concerns about the impact of development of land within the Green Belt on local and Borough-wide issues including: habitats and

flora/fauna, flood risk, agriculture, access and congestion, anti-social behaviour and noise, infrastructure provision, existing recreation and amenity value, house prices and tranquillity of existing residential areas

- Strong public and other stakeholder objection to the inclusion of:
Location 8: Land to the South of Whiston; Location 4: Land at Edenhurst Avenue (Huyton); Location 7: Land to the east of Halewood; Location 3: Land at Knowsley Lane (Huyton); Location 1: Land at Bank Lane, Location 6: Land at Carr Lane (Prescot); Location 9: Land at Cronton Colliery and Location 10: Land at Knowsley Village
- Strong developer / landowner support for the inclusion of all Green Belt locations
- A range of alternative locations were suggested by landowners and developers for release of Green Belt land for development, including: Woolton Waste Water Treatment Works (Halewood); Land South of M57 Junction 4 (Knowsley Village); Shrogs Farm / Radshaw Nook (Kirkby); and Land at Former Walton Sewage Farm / Axis Business Park (near Gillmoss)

Regeneration areas

- Both support and objection to the retail-led regeneration of Kirkby Town Centre including questions around the scale of floorspace being planned
- Questions around feasibility of delivering housing and employment at South Prescot
- Questions around deliverability of improvements in Prescot Town Centre

Environmental issues

- The Council should consider undertaking additional flood risk assessment work, to provide detail of site specific flood risks
- Support for recognition of importance of Green Infrastructure
- Biodiversity should be emphasised to a greater degree
- Concern about protection and enhancement of existing open spaces and playing pitches
- Minerals safeguarding areas should be introduced

The full body of this report contains extensive details of the comments received in relation to each of the policy areas within the Preferred Options Report.

Supporting documents

- A range of responses were received relating to supporting documents, technical reports and assessments produced to support the Preferred Options Report.
- A large number of comments related to the draft Knowsley and Sefton Green Belt Study – Knowsley Report, including questioning its methodology, the application of this, and its conclusions

- Comments were received on the methodology for the two technical papers relating to housing and employment growth, for which the methodologies and conclusions were questioned.
- Comments were also received about the Sustainability Appraisal, Habitats Regulation Assessment and Health Impact Assessment.

Petitions

- 6 petitions were received in total, including some which were duplicates of standard letters, and others which included space for signatories to sign.
 - 3 petitions (153 signatures) objected to the identification of land at Edenhurst Avenue (Huyton) for potential housing development
 - 1 petition (53 letters) objected to the identification of land at Knowsley Lane (Huyton) for potential mixed use development
 - 1 petition (412 signatures) objected to the identification of land to the east of Halewood for potential housing development
 - 1 petition (794 signatures) objected to the identification of land to the south of Whiston for potential housing development

Notes from meetings and presentations

- Comments were noted and minutes received from the wide variety of meetings and presentations held as part of the consultation period.

Conclusion and next steps

- Following the conclusion of the consultation period, written responses were acknowledged, and then all responses were coded and uploaded to the consultation portal, and key messages drawn out within this Report.
- In addition, consideration was given to the relative merits and perceived shortcomings of the consultation process.
- Responses will be considered during the drafting of the next stage of the Core Strategy, the Proposed Submission Version, along with newly emerging evidence, legislation and other contextual information.
- This report will be utilised to demonstrate the “storyboard” of Core Strategy drafting and therefore will be a key supporting document for the Examination in Public of the Core Strategy.

REPORT

1 Introduction

1.0.1 Welcome to the Report of Consultation for the Preferred Options Report Consultation on the Core Strategy, part of Knowsley's Local Development Framework. This document summarises the process involved in preparing and conducting the consultation, and the results of the consultation so that these can be fed back to participants, and be used in subsequent stages of Core Strategy preparation.

1.1 What is the Preferred Options Report?

1.1.1 The Preferred Options Report was the second formal stage of preparation of the Knowsley Core Strategy and was published in June 2011. The Core Strategy is the central document within the Knowsley Local Development Framework (LDF), the system of spatial planning introduced by the 2004 Planning and Compulsory Purchase Act. Once completed, the Core Strategy will provide the overarching strategy for the development of Knowsley up to 2027 and beyond, and along with the other documents to be produced as part of the LDF, will replace Knowsley's existing development plan (the Knowsley Replacement Unitary Development Plan, completed in 2006).

1.1.2 As the first stage of preparation of the Core Strategy, the Issues and Options Paper (November 2009) presented what the Council considered to be the key issues affecting Knowsley both now and in the future, and discussed broad options for tackling these issues. Being published for a period of public consultation, the Issues and Options Paper represented the first opportunity for people living and working in Knowsley to have their say on the development of the Borough, and particularly about the broad issues and options presented by the Council.

1.1.3 In June 2011, the Council published the Core Strategy Preferred Options Report which represented the second stage of preparation. Using the findings from the Issues and Options consultation (including the Issues and Options: Report of Consultation, published in May 2010) as well as a range of evidence and policy guidance, the Preferred Options Report set out the Council's preferred spatial strategy for Knowsley, within a series of policies. This explained in essence the range of planning policies which the Council thought most appropriate to guide the future development of Knowsley up to 2027. The publication of the Report for consultation represented the second opportunity for local people and stakeholders to participate in the preparation of the Core Strategy. Critically, the Preferred Options consultation represented the first opportunity for comments to be made on the Council's preferred strategy and range of policies. As explained in this document, the consultation process is critical to the success of

the Local Development Framework, allowing for community involvement in spatial planning and helping those with an interest in Knowsley to understand and help to inform the Council's strategic planning policies.

1.2 Purpose of the document

1.2.1 The purpose of the Report of Consultation document is to explain the processes involved in the Preferred Options consultation, and to make clear how and why this was a valuable process. The document summarises the results of the consultation, including the main points raised by respondents to the consultation. In doing this, the Council will be able to demonstrate that points raised have been considered, summarised and accounted for and hence that the consultation has been a helpful and worthwhile exercise. Finally, this document will play an important role in supporting the development of subsequent stages of the Knowsley Core Strategy, notably the forthcoming Publication and Submission stages, which will represent the final strategy which the Council will be seeking to adopt. The form and content of this will be shaped by consultation responses received at the Preferred Options stage. Finally, this Report of Consultation will feed into a wider "Developing the Knowsley Core Strategy" document, which will explain how the Core Strategy has been developed through different stages towards completion, accounting for consultation undertaken throughout the preparation process.

1.3 Summary of content

1.3.1 This document includes the following sections:

- **Preparation for consultation:** This summarises work undertaken in preparation for the public consultation.
- **Public consultation process:** This describes the activities involved in conducting the public consultation, including events and presentations, publication of materials and information dissemination.
- **Collecting and acknowledging representations:** This summarises the different ways in which responses to the consultation were submitted to the Council, how these were acknowledged and how these were sorted into a database.
- **Analysing representations:** This section involves a discussion of how many of the different types of representations the Council received and how these were analysed to ensure that the main points raised were accounted for.
- **Results of consultation – summary of main issues raised:** This summarises the results of the consultation including the main issues raised. This is presented by topic, demonstrating which of the issues were particularly commented upon during the consultation and which of the points were raised numerous times.

- **Lessons learnt:** This section explores the successes of the consultation, and also suggestions for ways in which consultation for subsequent stages of Local Development Framework preparation could be done differently.
- **Next steps:** This outlines the tasks to be completed to ensure that the results of the Preferred Options Consultation are fully considered as part of the preparation of the Core Strategy Publication and Submission versions. The section also briefly explains how and when subsequent stages of consultation will take place, as the Core Strategy progresses towards completion.

1.3.2 This document is supplemented by several appendices, which contain much of the detailed and technical content required to support the report. The appendices include the following:

- **Appendix A: Statement of Compliance with the Statement of Community Involvement:** This appendix sets out how the Preferred Options Consultation complies with the Council's Statement of Community Involvement, adopted as part as the Local Development Framework.
- **Appendix B: Cabinet Agenda, Agenda Pack and Minutes:** This appendix sets out the papers related to the Cabinet meeting at which the Preferred Options Report was given approval for consultation.
- **Appendix C: Publicity Materials:** This appendix includes a selection of the publicity materials used to promote and advertise the Preferred Options consultation period.
- **Appendix D: Standard Preferred Options Presentation:** A copy of a standard presentation used for a number of the Preferred Options consultation events is contained within this appendix.
- **Appendix E: List of Respondents:** This appendix lists the name and details of all those responding to the Preferred Options Report by letter and email.
- **Appendix F: Web Link to Report of Consultation (Objective):** This web link allows access to the Council's consultation portal, hosted on the Council's website, where all of the comments received relating to the Preferred Options Report can be viewed in full next to the relevant policy, paragraph, figure or table.

1.3.3 Throughout this document, signposts are provided using an "arrow" symbol, referring to data contained within the Appendices.

2 Preparation for Consultation

2.1 Drafting research and evidence collection: Issues and Options

2.1.1 Prior to the commencement of preparation of the Issues and Options Paper for the Core Strategy, the Council conducted widespread research of the current situation in Knowsley. This involved reviewing existing material held by the Council and its partners and also involved commissioning studies and evidence to support Core Strategy development. The following exercises were undertaken:

- The Council commissioned consultants to undertake data and analysis for the Council and the Local Strategic Partnership to help them plan their forthcoming activities (including the Sustainable Community Strategy, Local Development Framework and Economic Regeneration Strategy). This was the **Knowsley MBC: Core Evidence Base report** and was completed in November 2007.
- In addition to the exercises described above, a **review of existing evidence and local policy** was undertaken. This included existing policy documents and studies held and commissioned by the Council.
- As a result of this research, it was necessary for the Council to undertake or commission **additional research and evidence** for use in the development of the Core Strategy to Issues and Options stage and beyond. In some cases, this research was supplementary to existing information held by the Council and involved an update of research; in other cases this was new work required as part of the Local Development Framework process. Where appropriate, the Council sought to undertake studies jointly with neighbouring authorities within the Liverpool City Region area. These documents are listed in **Table 1**.

Document	Description
Strategic Housing Land Availability Assessment (SHLAA)	Undertaken by White Young Green on behalf of Sefton, West Lancashire and Knowsley Councils. This study is an assessment of the position of the Borough in terms of availability of land for housing over a 15 year period from a base date of April 2009. National planning policy states that all local authorities must undertake such assessments.
Town Centres and Shopping Study Part 1	Undertaken by Roger Tym and Partners on behalf of Knowsley Council. This study is a review of the Borough's town and local centres, shopping facilities and the needs and habits of those who live within Knowsley and use its centres.
Joint Employment Land and Premises Study	Undertaken by BE Group on behalf of Halton, Sefton, West Lancashire and Knowsley Council. This study is a review of existing employment land uses in the area,

(ELPS)	and estimates the need for new employment land for each Borough.
Housing Needs Survey and Update	Undertaken by David Couttie Associates on behalf of Knowsley Council. This study assesses in detail the housing needs of Knowsley, including in terms of quantity, type and tenure.
Knowsley Renewable and Low Carbon Energy Options Study	Undertaken by Arup on behalf of Knowsley Council. This study assesses the capability of Knowsley to accommodate renewable energy development.
Strategic Flood Risk Assessment (SFRA) Part 1	Undertaken by Atkins on behalf of Sefton and Knowsley Councils. The study demonstrates an assessment of flood risk across the area, in order that development may be directed away from areas facing the greatest risk of flooding.
Landscape Character Assessment (LCA)	Undertaken by 20/20 Knowsley on behalf of Knowsley Council. The study identifies and describes the character of the Borough's rural landscape, leading to the classification, naming and description of landscape character at the local authority scale.
Open Space, Recreation and Sports Needs Assessment and Strategy	Undertaken by PMP on behalf of Knowsley Council in 2005. The study identifies the needs for different types of open space in the Borough and standards of provision which are required.

2.2 Drafting research and evidence collection: Preferred Options

2.2.1 Much of the material produced to support the Issues and Options consultation was also referred to within the Preferred Options consultation. However, subsequent to the completion of the Issues and Options consultation in early 2010, the Council identified a need to update some of this previously collected evidence, and also to collect information in additional areas to help support the Preferred Options consultation. Again, this involving reviewing and manipulating existing data held by the Council, as well as commissioning and collating new materials. **Table 2** lists the documents that were commissioned or undertaken in-house by Knowsley Council officers.

Document	Description
Strategic Housing Land Availability Assessment (SHLAA) 2011 Update	An update to the previous SHLAA, undertaken by Knowsley Council. This study is an assessment of the position of the Borough in terms of availability of land for housing over a 15 year period from a base date of April 2010. National planning policy states that all local authorities must undertake such assessments.
Knowsley and	A joint study undertaken by Knowsley and Sefton

Sefton Draft Green Belt Study – Knowsley Report	Councils, supported by Envision UK. Assesses the capacity of Knowsley’s Green Belt to accommodate housing and employment growth. Guides the selection of broad locations potentially suitable for such growth, as outlined in the Preferred Options Report.
Town Centres and Shopping Study Part 2	Undertaken by Roger Tym and Partners on behalf of Knowsley Council. This second part of the study builds on the previous stage in identifying the appropriate levels of retail growth in Knowsley’s centres, to be consulted on within the Preferred Options Report.
Strategic Housing Market Assessment	Undertaken by David Couttie Associates on behalf of Knowsley Council. This study assesses in detail the housing needs of Knowsley, including in terms of quantity, type and tenure.
Draft Liverpool City Region Housing and Economic Development Evidence Base Overview Study	Undertaken by GVA Grimley in association with the 6 Liverpool City Region authorities, plus West Lancashire and Cheshire Councils. Assesses land supply and requirements for housing and employment across the Liverpool City Region and associated authority areas.
Draft Technical Report: Planning for Housing Growth in Knowsley	Produced by Knowsley Council, the report explains and justifies approach to housing provision and the setting of preferred housing growth targets within the Preferred Options Report. Included information summarising evidence relating to housing need and housing land availability.
Draft Technical Report: Planning for Economic Growth in Knowsley	Produced by Knowsley Council, the report justifies approach to employment land provision and setting employment land targets within the Preferred Options Report.
Draft Technical Report: Spatial Profile of Knowsley	Produced by Knowsley Council, the report summarises the spatial context of Knowsley, including issues and opportunities affecting each of Knowsley’s communities.

2.3 Review of policy context

2.3.1 As part of the preparation of the Preferred Options Report, a comprehensive update assessment of existing policy and strategy was undertaken. This was an important exercise to undertake to account for policy changes which had occurred since the Issues and Options stage, particularly accounting for the change of government at a national level which occurred in May 2010.

2.3.2 This exercise involved looking at several spatial levels of policy documentation, ranging from national planning policy provided by the Planning Policy Statements (PPS), down to existing policy at the local level, including that already adopted by the Council, such as the

Knowsley Sustainable Community Strategy. In addition, the implications of new policies and proposals announced by the national government were considered, including the Localism Bill. As at the Issues and Options stage, this process was extremely important in establishing the policy context in which the Preferred Options Report should be prepared, both in terms of the content and direction of existing policy statements as well as the processes and regulations for Local Development Framework preparation. Examples of strategy and policy reviewed are given in **Table 3**.

Table 3: Examples of strategies and policies reviewed as part of the Preferred Options consultation	
National Policy	Planning Policy Statements (PPS), Planning Policy Guidance (PPG), Minerals Policy Statements (MPS), Minerals Policy Guidance (MPG), National Policy Statements (NPS), Legislation, Circulars, draft Bills.
Regional Policy	The North West Plan: Regional Spatial Strategy for the North West (RSS) and its predecessor Regional Planning Guidance (RPG13), Regional Economic Strategy (RES), Regional Housing Strategy (RHS)
Sub-regional Policy	Multi-Area Agreement (MAA), Merseyside Local Transport Plan (LTP2)
Local Policy	Development Plan including Knowsley Replacement Unitary Development Plan (RUDP), Existing LDF documents including Supplementary Planning Documents and process documents, Sustainable Community Strategy, Future Schools documents, Council leisure and economic strategies.
Other Documents	CLG Plan Making Manual and Practice Guidance

2.3.3 In late 2010, the government published the Localism Bill, which identified several proposed changes to the planning system, including the legislation and regulations supporting LDF preparation by local authorities. These changes included: the preparation of a new, slimmed down national planning policy framework; changes to regional planning; a statutory duty for local authorities to cooperate in their production of LDFs; greater powers for local communities (including the ability to prepare neighbourhood plans); and powers to create Local Enterprise Partnerships.

2.3.4 The Regional Spatial Strategy has set the context within which much of the work to date on Knowsley's Local Development Framework has been undertaken. The RSS set statutory targets for new housing (by district) and employment land (by sub-region), which the Council was required to accommodate within its plans. This position informed the development of the Issues and Options Paper. However, in mid 2010, the government signalled its intention to abolish this tier of regional planning. Although this move will require legislation as set out within the Localism Bill, and therefore has not yet taken place, this future

change was a key issue for the Preferred Options Report and consequently the report and its supporting materials accounted for this.

- 2.3.5 The implications of the proposed National Planning Policy Framework were not accounted for within the Preferred Options Report, as at the time of preparation and consultation, the draft NPPF had not yet been published for consultation.

2.4 Sustainability Appraisal

- 2.4.1 The Council appointed consultants Urban Vision to undertake work on the **Scoping Report** for the Sustainability Appraisal for the Core Strategy and the wider Local Development Framework. The role of this document was to establish the type and scope of sustainability issues affecting Knowsley or likely to affect Knowsley in the future, including social, economic and environmental issues. This document also established a Sustainability Appraisal Framework and objectives, which will be used in assessing the sustainability impacts of policies and strategies within the Local Development Framework, including draft Core Strategy policies. The Sustainability Appraisal Scoping Report was prepared during early 2009, and was subject to consultation with the specific consultation bodies (Government Office for the North West, English Heritage, Environment Agency and Natural England). The Sustainability Appraisal Scoping Report was completed in May 2009 and later revised in October 2009, to be made available at subsequent stages of public participation on the Core Strategy, and in the appropriate Core Strategy Sustainability Appraisal report. This work was completed prior to the consultation on the Issues and Options Paper in late 2009 / early 2010.
- 2.4.2 Subsequent to this scoping exercise, the Council commissioned consultants to undertake an **Interim Sustainability Appraisal** on the content of the Issues and Options Paper. This was undertaken in two distinct phases: firstly the assessment of the broad strategic options being consulted on at the Issues and Options stage, and secondly of the thematic areas presented for discussion within the Issues and Options Paper. This exercise was extremely useful in assessing the relative social, economic and environmental sustainability of the range of potential policy options presented within the Issues and Options stage. The recommendations of this stage of the Sustainability Appraisal were included within the Preferred Options Report, and assisted the Council in determining a preferred spatial strategy for Knowsley, based on the most sustainable policy approaches. The Interim Sustainability Report for the Issues and Options stage was also published in full as a supporting assessment for the Preferred Options consultation.
- 2.4.3 In addition to this, the Council have commissioned a further **Interim Sustainability Appraisal**, in turn assessing the proposals within the Preferred Options Report. The purpose of this exercise is to identify the

sustainability implications of the different preferred policies within the Report. The second interim assessment was published alongside the Preferred Options Report to assist consultees in a) drawing conclusions about the sustainability of the Council's approach and b) recognising that the Council's commitment to considering sustainability implications at every stage of plan preparation. The Interim assessment report will assist the Council in refining its preferred policy approaches within the Publication and Submission versions of its Core Strategy. During the final stages of Core Strategy preparation, it will be extremely important for the Council to demonstrate how policy options have been scrutinised in terms of their sustainability and hence how sustainability considerations have been taken into account.

2.5 Other assessments

2.5.1 In addition to the Sustainability Appraisal work undertaken so far, at the Preferred Options stage, the Council considered it appropriate to undertake several different additional assessments.

2.5.2 The interim **Habitats Regulation Assessment** assesses the impacts of the Preferred Options Report on "European sites" which are of particular importance for flora and fauna. Although Knowsley does not contain any of these sites, the Council has a statutory duty under European regulations to assess whether the proposals of the plan could have impacts on European sites in surrounding districts. The Interim report, published alongside the Preferred Options report, was produced for the Council by specialist consultants.

2.5.3 The Council has also undertaken an interim **Health Impact Assessment** of the Preferred Options Report, which assesses the potential positive and negative impacts of the proposals within the plan on health and wellbeing within Knowsley. In addition, the first screening stage of an **Equality and Diversity Impact Assessment** has also been undertaken, which identifies potential impacts on different equality groups within the Borough, e.g. men and women, those who are disabled, etc.

2.6 Meetings and informal consultation

2.6.1 An extended series of meetings and discussions was critical to the development of the Preferred Options Report and to the development of a programme of public consultation on the content of the document. These meetings included the following:

- **Team meetings:** The Local Development Framework Team (also known as the Places and Neighbourhoods Team) of officers within the Council met frequently during the preparation of the Preferred Options Report, to discuss progress with the document and its supporting evidence base, and to resolve policy- and process-related issues arising during the preparation of this material.

- **Officer meetings:** The officer-level Local Development Framework Steering group met on an approximately monthly basis during the preparation of the Preferred Options Report, and received regular reports regarding progress on the Core Strategy and the wider Local Development Framework, giving a management-level steer for the development of planning policy and consultation materials.
- **Member meetings:** The Economic Development and Environment Scrutiny Committee carried out an “in meeting” review of the Knowsley Local Development Framework (LDF) on 24th January 2011 which provided an opportunity for Members to comment on:
 - The current progress of the LDF;
 - How the public and other stakeholders could be most effectively engaged in the Core Strategy Preferred Options Report; and
 - The implications of the changes proposed in the Localism Bill for the LDF.
- **Other meetings:** In addition to internal meetings and discussions, the Council sought to engage in discussions with key external partners regarding the development of the Preferred Options Report. These discussions enabled an outside perspective to be gained on the content of the Report as well as the processes involved in the preparation of the Core Strategy and the wider Local Development Framework. This included:
 - The Council secured support for the development of the Issues and Options Paper from **Planning Officers Society Enterprises (POSE)**. This useful exercise meant that a member of the Society read and gave critical advice on the emerging document, giving an outside perspective to the development of the document, particularly in terms of legal and soundness requirements.
 - A former senior employee of **4NW** was seconded for a month long period to provide an independent “critical friend” assessment in late 2010 of the emerging strategy.

2.7 Planning for the Preferred Options consultation

2.7.1 The Statement of Community Involvement (SCI) explains how the Council will involve the community in planning issues. Community involvement has a vital role to play in planning decisions; improving community participation is a central aim of the new planning system – the Statement of Community Involvement sets out in detail how this will be conducted. The production of the Statement of Community Involvement itself involved community involvement, with the Community Engagement Steering Group (part of the Knowsley Partnership), which enabled research to be undertaken around how people would like to be consulted during the process of development plan preparation. It is a statutory requirement for local authorities to produce and adopt Statements of Community Involvement; Knowsley’s Statement of Community Involvement was adopted by the Council and published in May 2007.

2.7.2 The Statement of Community Involvement explains the Council's preferred processes of consultation for Development Plan Documents, Supplementary Planning Documents and planning applications. It also sets out standard methodologies and consultation groups which will be utilised during consultation periods. The Council is responsible for ensuring that the process of Local Development Framework production is fully compliant with the measures set out in the Statement of Community Involvement. This is a critical element of ensuring that Local Development Framework documents, including the Core Strategy, are sound and eventually appropriate for adoption as the Council's development plan.

- **Appendix A** states how the Council has complied with the Statement of Community Involvement during the Preferred Options consultation.

2.7.3 The consultation for the Preferred Options Report and the preparation of the paper itself was subject to a detailed project planning process undertaken by the Council's Local Development Framework team. This included planning the completion of the document as well as its supporting information and evidence base, for political approval and subsequent publication. It also involved a detailed scheduling process for the consultation period, including the arrangement of meetings and drop-in events, the preparation of the online consultation portal and the printing of relevant materials, all ready for the commencement of the consultation itself.

2.8 Council Member approval

2.8.1 The Preferred Options Report was approved at the Knowsley Council Cabinet meeting of 8 June 2011 to be published for a 10-week period of public consultation in summer 2011.

- **Appendix B** gives a link to the minutes of the Cabinet meeting which gave the approval for the publication of the Preferred Options Report for a period of public consultation.

2.8.2 In addition, the Council's Deputy Chief Executive, in consultation with the portfolio holder for Regeneration Economy and Skills, approved on 15 June 2011 supporting materials for the Preferred Options Report to be published as part of the consultation.

3 Public Consultation Process

3.0.1 The Preferred Options Report was subject to a 10-week period of public consultation from **27 June 2011 until 5 September 2011**. In accordance with the adopted Statement of Community Involvement, the consultation was wide-ranging, in an effort to involve as many of those living in and working in Knowsley as possible. Methods of consultation included events and presentations, information dissemination and web-based consultation and also involved measures such as making sure that the consultation was widely accessible. These are summarised as follows.

3.1 Events and presentations

3.1.1 A number of meetings, workshops and presentations were undertaken to promote the Preferred Options consultation. These included:

- Public roadshow events in Knowsley's four town centres (these were advertised in advance) (see Figure 1);
- Presentations to Area Partnership Boards;
- Presentation and workshop at a Knowsley Council member event;
- Presentation at other Council boards and committees including the Town Centre Committee;
- Presentation to the Knowsley Local Strategic Partnership and associated sub-boards;
- Presentations to Parish and Town Councils;
- Presentations to specialist groups including: Knowsley SPARK Youth Group, Knowsley Older People's Voice, Knowsley Housing Partnership;
- Presentations to Knowsley Council officers groups; and
- A sub-regional partner's workshop for neighbouring authorities and regional and sub-regional agencies.

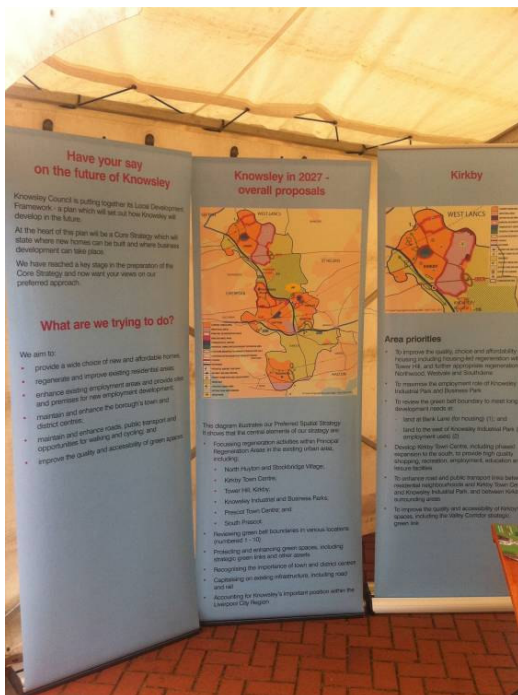
3.1.2 Where **presentations** were given, these were tailored to the specific needs and interests of the group receiving the presentation. For example, the Area Partnership Boards each received, during one of their scheduled meetings, a report which focussed on the implications of the Preferred Options report for the relevant geographic locality concerned. Where events contained a discussion element, these were also directed towards the particular interests of attendees, for example the Knowsley Housing Partnership discussions focussed upon issues of housing delivery and housing land.

3.1.3 For the previous Issues and Options consultation, roadshow or "drop in" events had been held at different Council One Stop Shops, Libraries and Leisure Centres. However, for the Preferred Options consultation, it was considered more appropriate to base **roadshow events** within Knowsley's town centres, as it was felt that this would attract a wider range of participants, including people going about daily business within the town centres. The range of dates were chosen based on the

need for a week-day and a weekend event in each centre, as this would avoid discriminating against those who were unavailable in the week or at the weekend. Therefore, eight events were planned, including one weekday and one weekend day for Prescot, Kirkby, Huyton and Halewood, running from 10am until 4pm each day. In addition to these, Whiston Town Council requested, arranged and advertised a further evening roadshow event for their constituents, which Council officers attended.

Figure 1: Photographs from roadshow events (Kirkby and Halewood)





3.1.4 A full list of events and presentations undertaken as part of the Preferred Options Consultation is given in Table 4 (shaded events undertaken during formal consultation period).

Table 4: Events and presentations undertaken as part of the Preferred Options consultation	
Date	Event / Presentation
22.06.11	Presentation to Town Centre Committee
22.06.11	Presentation to Knowsley "SPARK" meeting
30.06.11	Presentation to Knowsley Local Strategic Partnership Executive Board
2.07.11	Prescot Roadshow Event (Eccleston Street)
4.07.11	Knowsley MBC Members Event
4.07.11	Presentation to Cronton Parish Council
5.07.11	Kirkby Roadshow Event (Newtown Gardens)
8.07.11	Huyton Roadshow Event (Derby Road)
12.07.11	Report to Halewood Area Partnership Board
13.07.11	Sub-regional Partners Workshop
14.07.11	Report to North Kirkby Area Partnership Board
14.07.11	Presentation to Halewood Town Council
15.07.11	Halewood Roadshow Event (The Halewood Centre)
15.07.11	Presentation to Whiston Town Council
19.07.11	Report to South Kirkby Area Partnership Board
19.07.11	Joint Housing Market Partnership (at Sefton Council)
20.07.11	Presentation to Knowsley Housing Partnership
20.07.11	Report to South Huyton Area Partnership Board
21.07.11	Report to North Huyton Area Partnership Board
21.07.11	Presentation Knowsley Parish Council
26.07.11	Prescot Roadshow Event (Eccleston Street)
27.07.11	Report to Prescot, Whiston, Cronton & Knowsley Village Area Partnership Board
6.08.11	Kirkby Roadshow Event (Newtown Gardens)
13.08.11	Huyton Roadshow Event (Derby Road)
17.08.11	Whiston Roadshow (organised by Town Council)
20.08.11	Halewood Roadshow Event (The Halewood Centre)
25.08.11	Presentation to Health and Wellbeing Partnership Board
1.09.11	Presentation to Knowsley Older People's Voice

3.2 Publication of materials

3.2.1 On 27 June 2011, the Council made publicly available the Preferred Options Report and supporting evidence. The Council also produced materials specific to the consultation, including an 8 page summary leaflet which summarised the content of the Preferred Options Report. In summary, the materials published specifically as part of the consultation, included:

- Preferred Options Report
- Preferred Options Summary Leaflet
- Draft Knowsley and Sefton Green Belt Study – Knowsley Report

- Draft Technical Report: Planning for Housing Growth in Knowsley
- Draft Technical Report: Planning for Employment Growth in Knowsley
- Draft Technical Report: Spatial Profile of Knowsley
- Interim Sustainability Appraisal
- Interim Habitats Regulations Assessment
- Interim Equality and Diversity Impact Assessment
- Interim Infrastructure Delivery Plan

3.2.2 All materials were made available to the public through the following methods for the period until 5 September 2011:

- Publication of all materials on the Council's website (including versions to be downloaded and the use of the Council's consultation portal). This included up-to-date evidence and technical reports used to support the development of the Preferred Options Report. Screenshots of the Council's website and consultation portal are shown in **Figure 2** and **Figure 3** respectively.
- Supplying publicly accessible deposit locations, including Council One Stop Shops and libraries with the relevant materials (including reference copies of the Preferred Options Report and draft Green Belt Study, and copies of the Summary Leaflet and Response Form which could be taken away). Front covers of the Preferred Options Report and Summary Leaflet are shown in **Figure 4**.

Figure 2: Screenshot of the Council Local Development Framework webpage

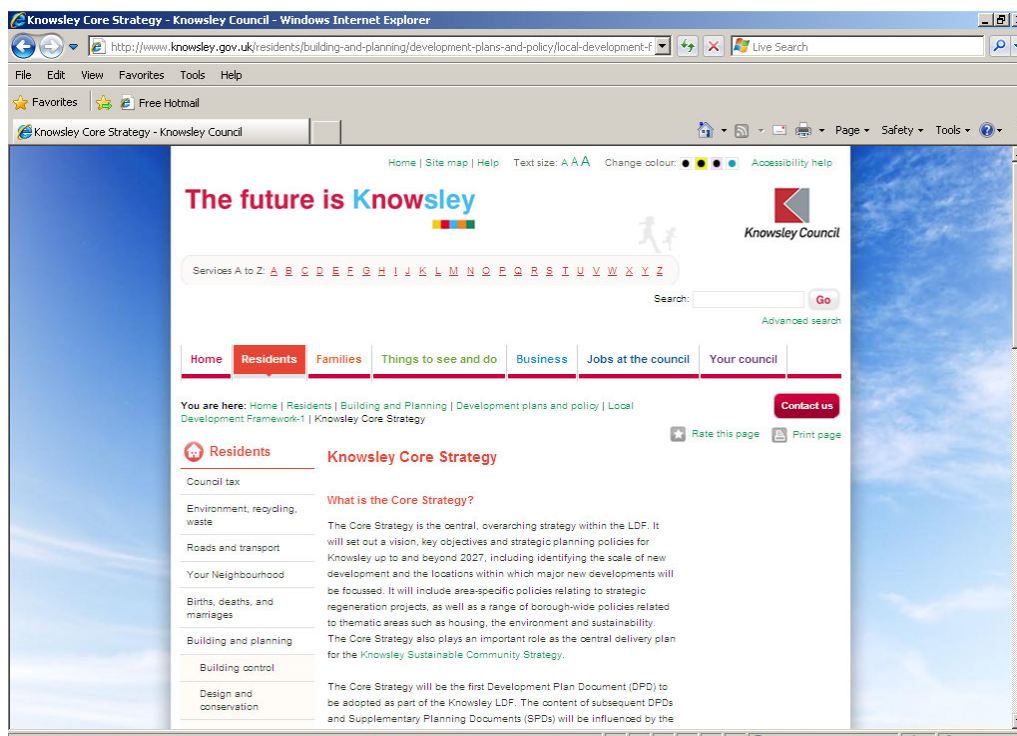


Figure 3: Screenshot of the Council Local Development Framework Consultation Portal (Objective)

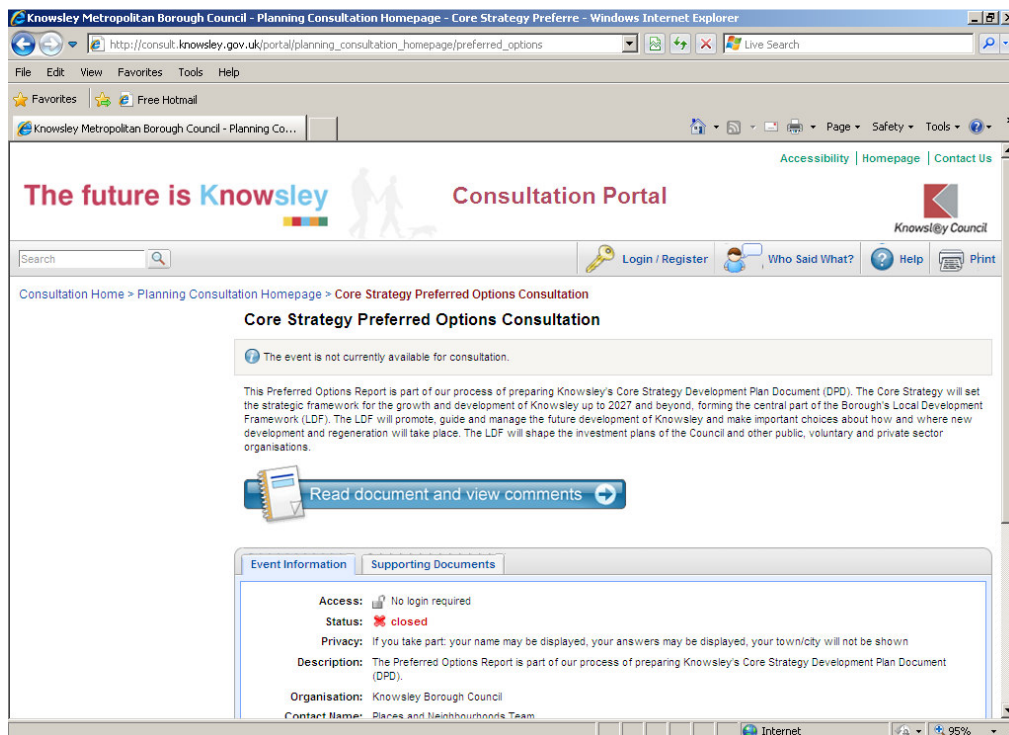
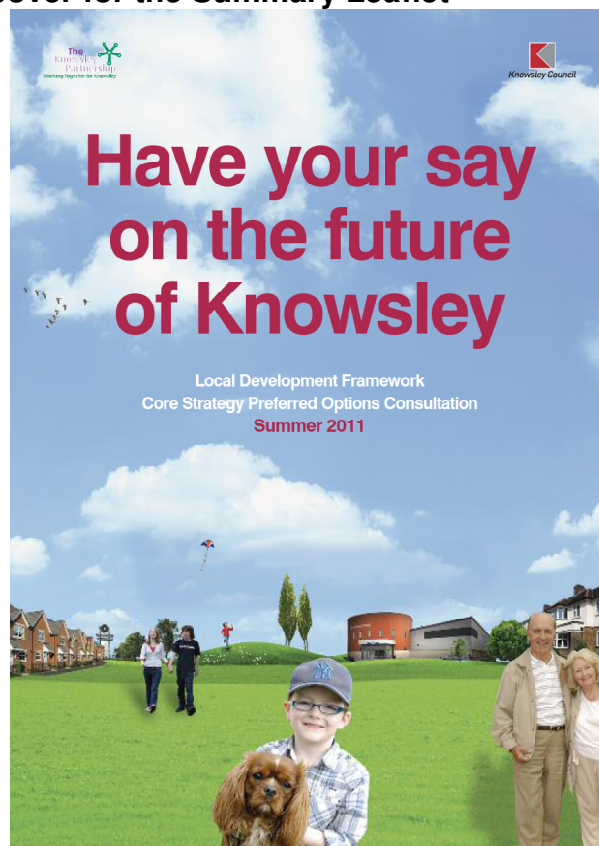


Figure 4: Front cover for the Summary Leaflet



- **Appendix C** contains a sample of the range of publicity materials used to promote and advertise the Preferred Options consultation.

3.3 Information dissemination (public)

- 3.3.1 The Council made every effort to ensure that information about the public consultation on the Preferred Options Report reached as many of those living in and working in Knowsley as possible. This included the following methods:
- Public notice in the local press
 - Sending a paper copy of the Preferred Options Summary Leaflet to each household in the Borough (via Royal Mail)
 - Electronically circulating a consultation update to businesses in the Borough (via Council Business e-newsletter)
 - Circulating posters advertising the consultation to public buildings, including libraries, One Stop Shops and Primary Care Trust premises
 - Contacting those on the Local Development Framework consultation database by email or letter
 - Updating the Council's website with the relevant information, including a front-page link to the Local Development Framework page which hosted all related documents (as above) and links to web-based consultation (using consultation portal software)
 - Utilisation of "Facebook" and "Twitter" social networking sites to promote the consultation, including linking to existing Knowsley-based networks
 - Dissemination of information to Knowsley Council officers through briefings, blogs, intranet updates
 - Local press articles including those placed by the Council and those reported by the media.

Figure 5: Preferred Options consultation poster



Figure 6: Screenshot of Facebook page



Figure 7: Example of local press article (Knowsley News, June 2011)



- **Appendix C** contains a further sample of the range of publicity materials used to promote and advertise the Preferred Options consultation.

3.4 Information dissemination (specific consultation bodies and Council members)

3.4.1 In addition to making members of the public and other interested parties aware of the public consultation for the Preferred Options Report, the Council also disseminated information about the public consultation to specific consultation bodies which the Council is obliged to consult in a particular way, as these bodies will have a particular interest in the Knowsley Local Development Framework. These bodies received a consultation letter accompanied by a paper copy of the Preferred Options Report at the start of the consultation period. This action was taken in accordance with the Knowsley Statement of Community Involvement.

- **Appendix A** states how the Council has complied with the Statement of Community Involvement during the Preferred Options consultation.

3.4.2 Knowsley Council members also received a package of consultation materials at the start of the consultation period, including a paper copy of the Preferred Options Report and copies of the Summary Leaflet prepared for the consultation period.

3.5 Web-based consultation

3.5.1 The Council has developed an online consultation system using “Objective” software, in order that representations on the Preferred Options consultation could be submitted quickly and easily. The Preferred Options Report was uploaded onto this system for the consultation period, which then presented opportunities to comment on the content of the papers at different junctures. The use of this web-based method for submitting consultation responses was encouraged during the Preferred Options consultation period, as it enabled respondents to focus on particular relevant parts of the consultation report, and ensured that those interpreting comments would clearly know to which paragraph of policy they related. Submitted comments through the consultation website required individuals to “log in” to the system with a unique username and password, to ensure that multiple versions of the same comments were not submitted by one person.

3.5.2 Whilst it was encouraged that respondents make use of the online consultation portal, there were other methods available for those who wanted to submit responses online. Responses were accepted through web-based email, and through the electronic return of a response form. The form was created in Microsoft word to either be filled in electronically or to be printed off and written on.

3.5.3 The Council’s website also hosted supporting documents for the Preferred Options consultation, including the key documents such as the draft Green Belt Study and Interim Sustainability Appraisal, as well as the full suite of available evidence supporting the development of the Preferred Options Report. It was therefore possible for consultees to view and comment on this supporting documentation. This was particularly relevant for those consultees who wished to comment on a particular aspect of the document which was strongly related to or relied on supporting evidence. Again, such comments could be returned electronically using the aforementioned response form, or in other written forms.

3.6 Making the consultation accessible

3.6.1 The Council recognises that at all stages of the preparation of the Core Strategy and the wider LDF, some of the consultation material would be necessarily complex and sometimes difficult to understand. The

Council therefore ensured that measures were taken to simplify materials and provide succinct summaries, which would allow members of the public and other stakeholders to practically engage with the consultation.

3.6.2 A major component of this effort to ensure that the consultation was accessible to a wide number of people was the production of the Preferred Options Summary Leaflet, mentioned earlier. This leaflet presented the Council's preferred strategy in a simplified way, including a copy of the key diagram. The leaflet also highlighted key priorities for the four constituent areas of Knowsley, and explained these in diagrammatic terms. Included within the leaflet was information for those who wanted to know more about the consultation, including links to the Council's website, and also information about the public roadshow events taking place during the consultation period. The leaflet included a series of key questions about what respondents liked or disliked about the preferred strategy, and also gave an opportunity to specify any area for which a particular comment was being made. Respondents were able to return their responses to the leaflet to the Council via a Freepost tear-out slip.

3.6.3 In addition to the Summary Leaflet, other measures included in the Preferred Options consultation to attempt to make the materials published more accessible and easier to understand included:

- The ability to provide large-print, Braille, audio and other language versions of materials where requested
- The ability to contact Council officers by telephone, email, post or in person (at drop in events) to discuss the consultation and any problems arising
- A comprehensive glossary included in the full Preferred Options Report, explaining specialist terms and acronyms
- The offer of engagement with minority and hard-to-reach groups through presentations and workshops
- Tailored presentations for specialist and interest groups to highlight relevant issues and sections of the Preferred Options Report.

4 Collecting and Acknowledging Representations

4.1 Collecting representations

4.1.1 The Council made arrangements that representations and comments on the content of the Preferred Options Report could be returned to the Council in a variety of ways.

- Firstly, they could be made using the online consultation portal as described in Section 3 of this report;
- Tear-off slips within Summary Leaflet, which could be returned to the Council via a Freepost;
- Longer response forms were made available at deposit locations, which could be returned at any One Stop Shop or library or alternatively returned by post or email;
- By writing to the Council, for example in letter or email form, attaching or including their representations within this correspondence;
- By commenting on the Council's Facebook page.

4.1.2 The Council requested that all representations on the Preferred Options Report were made in writing. However, the Council also had resources available to ensure that representations could be made in other ways, for example for partially sighted respondents, or for those who had problems with writing. On consultation materials, it was explained how comments would be used in the subsequent preparation of the Knowsley Core Strategy.

4.1.3 Further to those representations received by the Council, information was also gathered from the various events and presentations undertaken to promote the Preferred Options consultation. This includes notes taken at workshops and formal minutes of meetings. These resources proved to be a valuable method of collecting feedback from those attending and participating in discussions at these events.

4.2 Referencing representations

4.2.1 On receipt of representations in writing, the Council gave reference numbers to all communications. These included the following codes:

- Leaflet responses – POL(X)
- Letter responses – POLT (X)
- Email responses – POE(X)
- Facebook responses – POF(X)
- Petitions – these were given one reference for the whole petition (where text for every entry was identical) – POP(X). Some were also registered as letters, although the cross-reference to the petition reference was noted)
- Consultation Portal responses – these were given automatic referencing numbers when receiving by the consultation software (starting PO).

- 4.2.2 Where the same response was received in duplicate (e.g. by email and by letter), then individual reference numbers were given, though the cross reference indicating duplication was included in the referencing process. This applied also to some petitions, which were registered as letters and also subsequently as petitions.
- 4.2.3 All responses that were received after the consultation deadline were denoted with the code “L” to indicate that they were a late response. Late responses were not considered in the same manner as those which were received during the consultation period. This is because the Council considered it important to honour the well-publicised end date for the consultation, in particular in order to be fair to those who made a considerable effort to meet the deadline. However, Officers will undertake to review late responses in due course. In addition, where responses were submitted with the caveat that they may be changed (e.g. after formal sign off process had been undertaken) these were marked with the code “D” to indicate that these were in draft.

4.3 Acknowledging representations

- 4.3.1 It was important to ensure that those submitting comments on the Core Strategy Preferred Options consultation were made aware that their comments had been received by the Council. This was achieved in the following ways:
- The Council’s online consultation system automatically generates an acknowledgement of receipt of a representation for those responding online; and
 - Where representations were received via email or writing, the Council acknowledged these with a short written response. It should be noted that this did not include petitions received as part of the consultation (many of which were signed for by Council officers).
- 4.3.2 In receiving consultation responses, Council officers had to determine whether it was appropriate to log all responses exactly as received, as some responses contained content that was irrelevant or difficult to determine. The decision was made to log all responses but the following measures were also taken:
- Where representations were not relevant to the Preferred Options consultation but were relevant to another area of Council service, these comments were passed on to the relevant party.
 - Where representations were not relevant to the Preferred Options consultation and also contained offensive or abusive content, these were discounted from the process.
 - Where respondents requested to be kept informed of subsequent stages of preparation of the Core Strategy (through commenting on the full version of the Preferred Options Report), their contact details were added to the Local Development Framework consultation database. As a matter of process, all respondents

whose comments were added to the consultation portal (as described below) were also added to the consultation database.

4.4 Coding and inputting representations

- 4.4.1 All of the handwritten representations received by the Council through the method of returning the Summary Leaflet were inputted electronically using a spreadsheet function. This meant that a full catalogue of all of the responses received could be collected in a database for interpretation. All of the original versions of the response forms returned by post and submitted onto the Council's system were kept on record in paper form and are available to view on request.
- 4.4.2 Once all responses were available electronically, officers began the process of coding the responses before inputting these to the consultation portal. The coding process involved a detailed review of the points being made in each response, then selecting parts of the Preferred Options Report to which these could be attributed. The coding process was undertaken using a standard methodology, although this was undertaken by several different officers, hence cross-validation was used to ensure a consistent approach. Where comments could not be attributed to a particular paragraph, policy or graphic within the Preferred Options Report, these were attributed to a chapter or to the document in general. It is important to note that some text received was attributable to more than one part of the document (for example, the policy wording and a supporting table); in this case, multiple codes were used and the text in question was attached to more than one part of the document.
- 4.4.3 Some detailed responses received focussed on supporting documents to the Preferred Options Report, rather than on the text of the Report itself. This included evidence base documents such as the draft Knowsley and Sefton Green Belt Study, as well as published assessments such as the Sustainability Appraisal. Where this was the case, these responses were coded with the appropriate document name, and collated for later consideration as part of the review and refinement of the range of supporting documents. As above, some responses related to both the text of the Preferred Options Report and also to a supporting document; in this case, multiple codes were used so that these could be attributed to both the Report and the relevant supporting document(s).
- 4.4.4 With the coding complete, the process of inputting responses to the consultation portal began. The first stage of this was establishing whether the respondent was already registered to use the consultation portal. This depended on a) whether they had previously utilised the consultation portal, b) whether they had made responses to previous LDF consultations which had been input to the portal by officers, or c) whether they were a specific consultation body or other party which the Council had registered on the portal in order that they receive

notification of ongoing consultations. If the respondent was not already registered as a consultee, then a consultee profile was created for them. In addition, if an agent was employed to act on behalf of a respondent, an agent profile was created and attached to the consultee profile through a function of the consultation portal software.

- 4.4.5 It is important to note that the portal does allow respondents to register as “anonymous” although this is discouraged by the Council as it prevents respondents being notified of any further stages of consultation (i.e. by designated email or letter). It is also important to note that a number of respondents sent numerous responses to the consultation (i.e. several letters and/or emails). Once registered as a respondent, all communications were logged under the same profile. This means that there are less consultee “profiles” responding than individual responses (i.e. letters, emails, etc.).
- 4.4.6 Once the consultee was registered, each of their coded responses was added to the appropriate part of the document. Each individual entry was given an individual reference number (beginning “PO(X)”). This was contiguous with those respondents who used the consultation portal to register their comments; hence the early reference numbers were taken up by these respondents.
- 4.4.7 A full record was made of the response reference numbers (beginning “PO(X)”) and the consultee ID reference numbers. These are shown at **Appendix E**, alongside the full list of respondents and other references. This should enable cross-reference between the original response formats (i.e. letter, email) to the responses which were input onto the consultation portal.
- 4.4.8 On completion of the coding of responses and their input to the consultation portal, all responses were validated and published online. This means that all responses are available to view electronically, in association with the parts of the document they had been attributed to. This in essence represents a full Report of Consultation and a useful resource for cross-reference to the full wording of responses as part of the subsequent analysis of the responses. As noted earlier, the Council has also kept a full record of all materials received, including originals of emails and letters, which are available to view on request.
- 4.4.9 It is also possible for respondents to search for their name or email address on the consultation portal to view all responses added in by them, or by Council officers in their name, to the consultation portal. If any respondent was unhappy with the way in which their response had been coded and input to the consultation portal, Council officers would be glad to discuss this and alter the approach if appropriate.

5 Analysing Representations

5.1 Quantity of representations received

5.1.1 In total, the Council received 1866 responses to the Preferred Options consultation. This included individual responses and the signatories of 6 petitions. The breakdown of methods of responses that were used is shown in the **Table 5** below.

5.1.2 Of the consultation responses received, some were received from specific consultation bodies, and some were received from members of the public and other organisations. The breakdown of the responses received into those from specific consultation bodies, and those from non-specific consultation bodies is shown in **Table 6** below.

Type of consultee	Quantity
Specific Consultation Body (letter, email, consultation portal)	22*

<u>Method of Response</u>	<u>Number of Respondents</u>	<u>Comments Attributable</u>
Online		
Consultation Portal	4 (plus 71 anonymous comments) = 75	88
Email	69	510
Facebook	9	9
Paper		
Letter	48	113
Summary Leaflet Response Form	253	253
Petition Signatories	1412 (6 petitions)	1412
Total	1866	2385

Non-Specific Consultation Body	
<ul style="list-style-type: none"> Member of the Public (Letter, email, Facebook, petition, summary leaflet, consultation portal) 	1732
<ul style="list-style-type: none"> Developer / Landowner (letter, email, consultation portal) 	26
<ul style="list-style-type: none"> Other Agency (letter, email, consultation portal) 	15

• Other / Unknown (consultation portal)	71
Grand Total	1866
*some specific consultation bodies made more than one response	

5.2 List of specific consultation bodies responding

5.2.1 Of the 18 specific consultation bodies responding to the Preferred Options consultation, the following bodies were included (NB some specific consultation bodies made more than one response):

- Network Rail (POE06)
- Halewood Town Council (POE09, POLT18)
- Natural England (POE17)
- Wirral MBC (POE18)
- Sefton MBC (POE21)
- Homes and Communities Agency (POE24, POLT32)
- National Trust (POE25)
- United Utilities (x3) (POE27, POE32, POE55, POLT59)
- Halton BC (POE38)
- Highways Agency (POE42)
- English Heritage (POE44, POLT65)
- Merseytravel (POE46, POLT63)
- Liverpool CC (POE47)
- Environment Agency (POE51)
- Sport England (POE59)
- Whiston Town Council (POE57)
- Cronton Parish Council (POLT21)
- The Coal Authority (x3) (PO81, PO82, PO83)

➤ **Appendix E** gives the full list of specific and non-specific consultation bodies responding to the consultation on the full Preferred Options Report

5.3 Analysing written responses

5.3.1 The most important way of analysing the representations received was to consider the detailed responses received by the Council during the consultation period. This included, as explained in the previous section, both responses received online (either through the consultation portal or email) and on paper (either through letters or petitions). A separate analysis was undertaken of the responses submitted via the summary leaflet.

5.4 Responses to the summary leaflet

- 5.4.1 The basic methodology for analysis included the following measures:
- Numerical analysis of the “yes” and “no” responses
 - Numerical analysis of the geographical areas of interest
 - Looking for and grouping together similar issues and comments
 - Summarising the main issues raised overall
- **Chapter 6 Section A** sets out the **main issues raised** by those submitting leaflet responses
- **Appendix F** gives a link to the part of the Council’s website where full responses to the leaflets are stored.

5.5 Responses to the Preferred Options Report and supporting documents

- 5.5.1 The basic methodology for analysis included the following measures:
- Coding responses by type of response and topic raised
 - Attaching responses to the Preferred Options Report (where appropriate) within the consultation portal
 - Attaching responses to evidence base documents or supporting assessments (where appropriate)
 - Looking for and grouping together similar issues and comments
 - Summarising the main issues raised overall
- **Chapter 6 Section B** sets out the **main issues raised** by those submitting responses to the full Preferred Options Report.
- **Chapter 6 Section C** sets out the main issues raised by those submitting responses to the Preferred Options evidence base or supporting assessments.

5.6 Petition responses

- 5.6.1 Since the number of petitions received was relatively limited, and given the importance of fully representing the views of the signatories of these, the report includes a full reproduction of the text of the petition, any supporting text, plus a statement of the number of signatories.
- **Chapter 6 Section D** lists the petitions received.

5.7 Notes of comments received from meetings and presentations

- 5.7.1 As outlined in **Chapter 3** of this report, a number of events and presentations were held as part of the Preferred Options consultation, some of which involved workshops and discussion sessions around the content of the Preferred Options Report. The discussions undertaken and the points raised therein were documented in the form of minutes and detailed notes of the meetings, in order that these may be fed into the consultation process. The following events / presentations were recorded in such a way:
- Halewood Area Partnership Board

- Halewood Town Council
- Knowsley Health and Wellbeing Board
- Knowsley Older People's Voice Event
- Knowsley Parish Council
- North Huyton Area Partnership Board
- North Kirkby Area Partnership Board
- Prescott, Whiston, Cronton and Knowsley Village Area Partnership Board
- South Huyton Area Partnership Board
- South Kirkby Area Partnership Board
- Sub-regional Partners Workshop Event
- Town Centre Committee
- Whiston Town Council

5.7.2 In analysing the records of these meetings, summaries of main issues raised were produced, ordered by theme and geographical area to which points related. The basic methodology for analysis including the following measures:

- Looking for and grouping together similar issues and comments
 - Summarising the main issues raised overall
- **Chapter 6 Section E** includes the **main issues raised** as part of the consultation meetings and presentations undertaken

6 Results of Consultation – Summary of Main Issues Raised

6.1 Chapter format and presenting the issues

- 6.1.1 This important chapter summarises the main issues raised in different types of response to the Preferred Options consultation. The Chapter is split into four sections: one relating to the responses received to the summary leaflet, one relating to responses received to the full document (including petitions), one relating to responses received to the evidence base and supporting assessments, and one relating to responses documented at meetings / workshops. A final section concludes with comments received about the consultation process, and how this could be changed or improved.
- 6.1.2 Due to the differing views and competing interests of those responding to the Preferred Options Report, some of the main issues raised were directly contradictory to each other. However, it is important that these issues were raised and have been summarised accordingly, to demonstrate the competing views of those responding, and to ensure that where disagreement over a particular preferred policy approach exists, both sides are able to air their views. In addition, due to the varying interests of those responding to the consultation, there is an uneven coverage as to which parts of the consultation materials were focused upon.
- 6.1.3 It is extremely important to emphasise that this section of the Report of Consultation is a “summary of the main issues raised”, and hence there is not a presentation in this document of the exact responses submitted to the consultation. However, we have sought to make available, in so far as it is possible, the full, un-summarised and unabridged consultation responses, on the Council’s consultation portal.
- **Appendix F** gives a link to the online consultation portal, which includes all comments in full, linked to the relevant part of the full Preferred Options document.

Section A – Written Responses to the Preferred Options summary leaflet

- 6.1.4 This section summarises the main issues raised through the analysis of written responses received to the Preferred Options Summary Leaflet. It summarises the responses received to the specific questions asked within the leaflet response form, and also the numerical analysis available through looking at the leaflet e.g. considering answers to the “yes” / “no” question, and which areas upon which comments were being focused. The section is organised under the different elements of the leaflet questions, namely:

- On the whole, do you agree with the proposals set out within this leaflet? (yes / no / other analysis)
- What are your overall thoughts on the proposals?
- If you would like to comment on a specific area, please tell us which one (geographical area analysis)
- What do you like about plans for this area?
- What do you dislike about plans for this area?
- Any other comments?

Section B – Written Responses to the Preferred Options full document

6.1.5 The section summarises the main issues raised through the analysis of written responses received to the full Preferred Options Report. This section summarises various detailed comments received for each of chapters and the preferred policy options set out in the report.

6.1.6 This section focuses on the qualitative responses received regarding different parts of the Preferred Options document, which should be read in full. The section is structured under titles referring to the different chapters of the report, and also specifically refers to the Preferred Policy Options which make up the proposed policy content of the report. For each section and policy, the headings “supportive”, “non-supportive” and “other” have been used. In this regard, the ‘other comments’ sub category includes a comparative level of responses that could not be categorised as specifically supportive or non-supportive.

6.1.7 Since the majority of the comments focused on the wording of the preferred policies, some statistical analysis was also considered appropriate. Hence, for each Preferred Policy Option, a standard format has been included, and is set out as follows:

Preferred Policy Option CSXX: (Title)	Total	%
Supportive Comments	X	X
Non Supportive Comments	X	X
Other Comments	X	X
Total Comments	X	X

6.1.7 To complete the above table, each of the detailed responses were considered, assessed and subdivided into appropriate categories in terms of whether they were supporting or not supporting a specific preferred policy option or just commenting on an issue in general. This approach therefore offers a more accurate context for the proportion of overall responses received per issue.

6.1.8 Although the overall response levels per preferred policy option are in most cases relatively low, a percentage based statistical analysis still

offers the potential for useful insight into the overall consultation response for the approach.

Section C – Written responses to the Preferred Options evidence base or supporting assessments

6.1.9 This section summarises the main issues raised through the analysis of written responses relating to evidence documents or supporting assessments which were published alongside the Preferred Options Report. The section is organised by the document in question, with any relevant issues raised summarised beneath this sub-heading. While some documents received a great deal of attention (e.g. the Knowsley and Sefton Green Belt Study), others only received a very small number, or no comments. A list of those evidence base and supporting documents which did not receive any comments is included within the conclusion of this section.

Section D – Petitions

6.1.10 This section reproduces the petitions received during the consultation period, including the full text of the petition, any supporting or additional text, and the number of signatories.

Section E - Responses documented at meetings and presentations

6.1.11 This section summarises the main issues raised through analysis of the notes and minutes taken at various consultation events and meetings. These are organised by the theme of the main issue raised and also geographical area affected.

SECTION A – WRITTEN RESPONSES TO THE PREFERRED OPTIONS SUMMARY LEAFLET

A1: Question 1 – On the whole, do you agree with the proposals set out in this leaflet?

A1.1: The majority of respondents to this question responded by indicating one of the “yes” or “no” options given. However a substantial number of respondents chose not to respond to this question, leaving the “yes” and “no” options blank. A small number of respondents chose to add another option to the “yes” / “no” question, such as “don’t know” or “yes and no” to indicate that they agreed with parts of the leaflet, but not others. The below table illustrates the numerical breakdown of these responses.

Table 7: Question 1 – On the whole, do you agree with the Proposals set out in this leaflet?	
Yes	79
No	111
Other / Don’t Know	7
Blank	56
Total Responses	253
% Yes Responses	31%
% No Responses	44%

A2: Question 2 – What are you overall thoughts on the proposals?

A2.1 A wide variety of responses were given to this question. These can be loosely grouped together as follows:

A2.2 Support

- Over 60 responses to this question expressed general support for the proposals outlined within the leaflet.
- Aspects of the proposals which were particularly supported included:
 - Regeneration of Kirkby town centre
 - Provision of new houses including affordable housing

A2.3 Objection

- Over 120 responses to this question expressed objections to the proposals set out in this leaflet
- Aspects of the proposals which were particularly objected to included:
 - Proposed use of Green Belt land for housing / employment development, particularly in Whiston, Halewood and Huyton
 - The lack of progress with retail-led regeneration at Raven Court centre in Halewood
 - The current position of Prescot Town Centre

A2.4 Scepticism / confusion

- Nearly 30 responses expressed scepticism about the proposals, and whether these could ever be delivered within Knowsley
- A substantial number of respondents also expressed scepticism about the value of the consultation exercise, stating that they did not believe this represented a valuable exercise
- Over 15 responses expressed confusion or a lack of understanding about the proposals and also questioned whether the level of detail set out within the leaflet was appropriate for the purposes of consultation

A2.5 Non-planning issues

- Many respondents mentioned issues that were not directly relevant to the proposals set out within the leaflet. Popular issues included:
 - Litter and the urban environment
 - Anti-social behaviour
 - Congestion and public transport services
 - The Council's leisure strategy and previous decisions made about the location of leisure centres
 - A perceived monopoly of the retail market by some retailers

A3: Question 3 – If you would like to comment on a specific area, please tell us which one:

A3.1 The below table illustrates the responses given to this question. The total number of responses is not equitable to the number of leaflets received, as some respondents indicated more than one specific area which they wished to comment on e.g. "Huyton and Halewood". These were logged under both areas.

Table 8: Question 3 – If you would like to comment on a specific area, please tell us which one:	
Huyton and Stockbridge Village	47
Kirkby	29
Prescot, Whiston, Cronton and Knowsley Village	60
Halewood	44
Blank	78
Total Responses*	258
% Huyton and Stockbridge Village	18%
% Kirkby	11%
% Prescot, Whiston, Cronton and Knowsley Village	23%
% Halewood	17%
% Blank	30%
* some respondents indicated more than one area they wished to comment on	

A4: Question 4: What do you like about plans for this area?

A4.1 Huyton and Stockbridge Village

- Recognition of local history and character
- Construction and completion of the new Leisure and Culture Park

A4.2 Kirkby

- That the plans may bring jobs for young people and currently unemployed in Kirkby
- Planned retail-led regeneration in Kirkby Town Centre
- Potential positive impact of drawing more families into the town due to improved residential offer, facilities and infrastructure
- Protection of Valley Road Corridor

A4.3 Prescot, Whiston, Cronton and Knowsley Village

- Capitalising on Prescot's historic legacy and regenerating the town centre, including provision of better links to Cables retail park
- Protecting and enhancing character of rural villages including Knowsley and Cronton
- Provision of affordable housing options, particularly within areas which currently attract anti-social behaviour
- Possibility of new jobs and businesses locating in the area
- Improving the quality of greenspaces around Whiston

A4.4 Halewood

- Delivering planned retail-led regeneration in Raven Court
- Improving quality and accessibility of green and open spaces, including Halewood triangle
- Recognition of the need for new jobs and housing, including affordable housing
- Opportunity to enhance connections between Halewood and Liverpool, including employment
- Focus on development of existing vacant brownfield sites e.g. Bridgefield Forum

A5: Question 5: What do you dislike about plans for this area?

A5.1 Huyton and Stockbridge Village

- Utilisation of land at Edenhurst Avenue and Knowsley Lane for new residential development, including concerns about traffic and environmental impacts, flood risk, community safety and impacts on houses prices
- Overlooking of the Bluebell Estate and the Roby areas within plans and proposals
- Lack of replacement of "Heatwaves" centre in Stockbridge Village and poor facilities for youth recreation
- Lack of plans for new shops and existing range of shops / facilities and vacancy in the town centre
- Poor existing transport links for Huyton and Roby

- The car parking charging scheme in Huyton town centre
- Apparent mismatch between residential regeneration and infrastructure provision e.g. in North Huyton

A5.2 Kirkby

- Utilisation of land at Bank Lane, Kirkby for new residential development, including concerns about damage to local amenity, traffic increases and environmental impacts
- Residential development should be private market housing, not social housing
- New retail development in Kirkby town centre could undermine the existing shops and facilities
- Lack of good public transport links to Liverpool and other areas
- Lack of schemes to encourage reinvestment in employment areas or public transport facilities to service these areas
- Potential loss of open and green spaces for new development
- Lack of detail about funding proposals for long term regeneration of employment areas
- Lack of proposals for new and improved sports and leisure facilities e.g. sports arena, ice rink, cinema

A5.3 Prescot, Whiston, Cronton and Knowsley Village

- Utilisation of land at Knowsley Village for new residential development, including concerns that this may undermine the “village” atmosphere
- Utilisation of land to the south of Whiston for new residential development, including concerns about potential impacts on traffic levels and the loss of environmental amenity, important habitats for flora and fauna and functional farm land
- Utilisation of land at Cronton Colliery for employment uses including concerns that this should be left for nature conservation. Question whether brownfield sites should be used instead
- Apparent turnaround of 1995 decision to keep land to the South of Whiston within the Green Belt
- That any new development at Halsnead area should include employment development to limit the number of length of journeys for local people
- Lack of visible progress with footpath links from Whiston to Cronton
- Lack of detailed focus on regeneration of Prescot Town Centre, including tackling town centre vacancy / unsuitable shops and dealing with the negative impact of Cables retail park on the town centre
- Lack of recognition of the impact of car parking charges on the viability of town centre regeneration
- Lack of plans for new / replacement leisure facilities within Prescot and the need for new community infrastructure
- Lack of plans for regeneration in Whiston
- Lack of recognition of the unique character of the constituent parts of the area, and disagreement with grouping together areas under one title

- Questionable need for new houses when there are problems with selling empty houses in the existing market

A5.4 Halewood

- Utilisation of land to the east of Halewood for new residential development, including impacts of enlargement of the settlement
- Lack of information about the type / tenure / access to any new residential area to the east of Halewood
- Questionable whether new houses built in Halewood would be attractive and would sell given existing housing market
- Concern that additional “private” housing schemes would be poorly integrated into the community
- All existing greenspaces should be left for use for agriculture and wildlife and not be used for new development
- Potential negative impact on flooding and local flood plain caused by new development
- Potential negative impacts of new residential communities taking jobs in local industry away from local people
- Poor existing retail provision and continued delays to the delivery of retail-led regeneration in Raven Court, Halewood centre
- Poor existing facilities e.g. community centres and public transport links to larger centres and insufficient provision of infrastructure for new communities
- Potential negative impacts of improving access to existing greenspaces e.g. risk of anti-social behaviour
- The feeling of relative neglect of Halewood compared to other areas of the Borough

A6: Question 6: Any other comments?

A6.1 Many of the responses to this question repeated points made in relation to questions 4 and 5. Additional responses to this question have been summarised as follows under the following area-based headings (comments and questions). A further section relating to points which are not attributable to a particular area are included under additional sub-headings.

A6.2 Huyton and Stockbridge Village - comments

- There is a need for provision of play equipment in the Alt area / Bluebell Estate
- There is a need for better public transport links to the new Leisure and Culture park
- The Council should support local police and enforce anti-social behaviour measures. The police should conduct further investigations into local drug use
- The subway at Huyton train station needs improvement
- More employment opportunities should be provided locally
- There is a need to bring the community back to Stockbridge Village

- Better public transport is needed, especially via Tarbock Road to Broadgreen hospital, and around Bowring Park
- The electrification of the railway could mean the bridge at Bridge Road Roby might need to be dismantled
- There is a need for a One Stop Shop and community centre in Court Hey / Bowring Park and a better footpath to Childwall Valley Road doctors, post office and buses
- Everything is great in L36, please leave it as it is

A6.3 Huyton and Stockbridge Village - questions

- What is happening to the old leisure centre in Huyton?
- Is the area appropriate for supported / affordable housing and housing for professionals?
- What are the plans for the former Bowring Park school site?
- Why hasn't Bowring Park been refurbished yet?
- Have Liverpool residents and City Council been informed of plans for Edenhurst Avenue area?

A6.4 Kirkby - comments

- Better shopping facilities are needed in the Shevington Park area, including 24 hour shops and petrol stations
- Transport to and from surrounding communities is needed, particularly if people are going to visit Kirkby town centre development
- There is a need for new magistrate court facilities in Kirkby
- Opponents of new development are in a tiny minority – Kirkby has been denied investment and existing plans are welcomed
- Other companies (in addition to Tesco) should be encouraged to locate in Kirkby town centre
- Open and green space should be preserved as far as possible, including at Westvale, Southdene and Field Lane
- Traffic volumes on Cherryfield and Bewley Drive should be considered

A6.5 Kirkby - questions

- What about Kirkby's history i.e. St Chad's Church and Millennium Green?
- Why are there no leisure facilities in the plans for Kirkby?

A6.6 Prescott, Whiston, Cronton and Knowsley Village - comments

- More sports grounds are required in Knowsley Village area
- Facilities for activities are required, e.g. dancing, singing, sport; creating 'useable' green space for football, cricket, basketball, shooting, etc.
- More thought should be given to easily affordable life enhancing activities e.g. swimming for over 70s
- The Council should listen to what Prescott residents want, not what developers want
- Prescott's town centre retail park has taken trade away from the town centre. It should be recognised that Prescott town centre and the retail park are separate entities

- Traffic should be directed through Prescot town centre rather than around it
- Whiston is a village and not a town
- The children in Whiston are not able to access the same facilities as elsewhere e.g. leisure centre, public transport
- Residents of Park Home retirement park moved there for peace and quiet and there is concern about surrounding them with houses
- Suggestion that the waste ground by the roundabout at the end of Windy Arbor Road could be used as a development site
- The Council should work with the RSPB and Woodland Trust developing these urban areas (Whiston) beneficial to nature, including grass gardens rather than rockeries. The Council should take responsibility for the habitat they destroy
- There is a need for swimming pools, leisure centre, bowling centre, play facilities for the young children, and a cinema and new shops in Prescot
- Any development of land south of M62 would reduce the feel of Cronton as a village
- Why is Cronton a part of Knowsley when villagers shop in Widnes and use Halton leisure facilities as it is more convenient
- The creation of a park of the size of Richmond Park (London) would be a more positive move, and the opening up of the historic park and gardens to the public (Lord Derby Estate)
- If the 1800 homes are built, a conservative estimate three cars per house, 5,400 cars in and out using Windy Arbour Road, Tarbock Roundabout or Rainhill roundabout

A6.7 Prescot, Whiston, Cronton and Knowsley Village - questions

- What the Council are gaining by ruining the (Knowsley) Village?
- Where are the new leisure facilities and cinema promised for Prescot many years ago?
- Why is Whiston not included in regeneration plans?
- If you go ahead and build the houses (at South Whiston) are you prepared to provide 24 hours round the clock security with cameras for Halsnead Park, plus constant uniformed patrols?
- Properties in Prescot and nearby areas lie empty - why encroach on a retirement park - and what will happen to nearby flora and fauna?
- Stadt Moers Park is a vast area, far too big. Why not use small suitable pockets of the 'Park Land' for housing development?

A6.8 Halewood - comments

- High density development would bring congestion and less urban greenspace for Halewood
- Calling on Halewood Town Council to reject plans for location of new residential development in areas of Green Belt
- There are some positive instances of apartment developments in Halewood
- Social housing already provided in Halewood seems very small with inadequate parking

- Problems parking at Halewood station, as well as access for disabled and those with mobility difficulties
- People of Halewood are excluded from Knowsley. Kirkby and Huyton should not be given priority over Halewood
- Halewood residents should pay less community charge (i.e. Council tax) due to the lack of facilities and shops in the area

A6.9 Halewood – questions

- When will the completion of Raven Court centre regeneration occur?
- What are the plans for provision of community infrastructure e.g. police stations?
- Do disused railway lines (i.e. loop line) have potential for reinstatement?
- What tenure will new houses in Halewood be, either private or rented?
- Why there isn't an additional railway station on the West Coast Main Line between Liverpool South Parkway and Runcorn?
- Will proposals for cutting of housing benefits affect those living in their own houses and force them to move?

A6.10 Green Belts

- “Chipping away” at the Green Belt should not be allowed
- There are lots of pieces of land and units lying around that should be used / refurbished rather than interfering with the Green Belt
- The most important thing is to keep Green Belt land green
- Question whether the Green Belt study has looked at the wider impacts of development e.g. on the flood plain, local habitats
- Employ planners with environmental sympathy
- Why ruin Green Belt with houses nobody can afford? There is no shortage of houses for sale round Edenhurst
- Green Belt land (should be) owned by the people, not the Council, and should not be developed
- Does review the Green Belt mean reduce the Green Belt?

A6.11 General

- Sefton has brought together empty property owners with those needing flats or houses – could this method be employed in Knowsley?
- Who is going to pay for all these improvements? Now shoppers have to pay for parking, do we need more shops when markets and shops are already empty?
- Knowsley has a high housing vacancy and repossession rate
- Where are all the young people going to go? They are the future
- That developers should be made to pay for planning consent, for provision of community facilities and infrastructure
- Disapproval is given to house builders making huge profits and then moving out of an area, leaving the burden of maintenance of infrastructure with the local authority
- Regeneration money has been squandered and would be better spent on provision of banks and food retail stores

- Demolition and rebuilding of existing estates would represent a better approach to provision of new housing
- Waste DPD allocations should be shown within the publication document (for Huyton and Kirkby)
- All of the jobs created should be for the people of Knowsley as employment is at an all time low in the area. Construction jobs should also go to local people rather than being outsourced
- There is no mention of new transport links except airport link road and cycle ways. Electric railways must be part of development plans
- The housing would give young families a chance to get on the housing ladder
- If new housing is needed to meet council needs isn't it short sighted to remove facilities in the area, e.g. swimming baths, function suites, etc?
- What about looking at setting up more allotment spaces, and also renewable energy for households that qualify and for council buildings?
- Support is given to provision of affordable housing and shared ownership housing products
- Older people without access to cars have been overlooked
- Accommodation for those wishing to downsize must include two bedrooms, which are essential for accommodating families and carers

A6.12 The consultation process

- More details needed i.e. name affected areas by road names not North, South, East or West as the majority of people do not see themselves or associate where they live as compass points
- The Council have introduced parking fees in Huyton but feel justified in spending money on a consultation exercise
- Lack of information about the consultation event means poor attendance at drop-in events
- The provision of an advert in a local paper would represent better value for money than the production of a consultation leaflet
- There is scepticism about whether comments will be taken into account and feelings that the decisions about the plan have already been made
- Welcome for the receipt of consultation materials but the cost of production and distribution within the current financial climate is questioned
- Areas of Knowsley Village have not been informed about the consultation, except by neighbours
- The Council should circulate proposed plan with road names and exact locations of new housing before building starts
- The Council did not ask the views of ordinary people
- Why consult residents and then ignore the results of consultation?
- Is the Council are trying to sneak plans in through the back door?
- Did the Council not circulate leaflets to residents so that there was insufficient time to reply to the consultation?

A6.13 Non-planning issues

- More refuse bins, dog bins and dog walkers required
- Work is required at the Page Moss and Dinas Lane area

- Younger people in Huyton South should stop playing football close to people's houses
- Young children play area activities are not being considered at all due to the cut backs
- The police should control rowdiness of people leaving pubs
- Council should support fencing off of houses backing on to open green spaces, including St. Chad's, as anti-social behaviour is a local issue
- The Council continues to paint a depressing view of Kirkby, even when the town has produced many high achievers and sportsmen
- Sonae should be closed as it is having negative health impacts on the current and future populations of Kirkby
- More control is needed to stop vandalism on Friday nights on South Avenue
- Local people can't afford to go to the Safari Park
- Improved pavements and road surfaces are required
- The bus stop outside 'Rays' confectionary shop in Prescott should be moved for health and safety reasons including diesel emissions. Prescott bus station should be used as it is always empty
- There are road speed issues on Bridge Road in Roby
- There are too many speed bumps in Halewood, making driving uncomfortable and damaging cars
- There are local instances of speeding traffic in parts of Halewood
- It is hoped that there will be information about any change in transport (times, etc.) once Kirkby town centre has been redeveloped
- Lack of support for Future Schooling programme, including questioning whether this represents positive value for money for the Council
- Why there isn't a weekly market in Huyton as there is in Kirkby?
- Bring back the clock to Prescott Precinct as it is a beautiful feature
- The narrowest street in Europe (in Prescott) could be a tourist attraction

SECTION B – WRITTEN RESPONSES TO THE PREFERRED OPTIONS FULL DOCUMENT

B1 Chapter 1: Introduction

B1.1 Local Development Framework context / Sustainable Community Strategy

- Support is given for the overall LDF preparation process, including the role of the Core Strategy in this process and the role of the Sustainable Community Strategy (SCS) in supporting the pro-growth agenda for new residential development
- Future revisions to the SCS should refer to landscape and natural environment
- Reference to the SCS drivers is questioned given the apparent lack of infrastructure investment
- The SCS mentions health and well being; impacts on these should be considered when deciding to build on Green Belt
- The “Borough of Choice” is inappropriate terminology, as it is felt that decisions have already been made by consultants as part of the Green Belt study process

B1.2 National policy context

- The Localism Bill seeks to return decision making powers to local communities and allow them to protect the character of their neighbourhoods. This requires more than just consultation and is not considered in sufficient detail
- The Localism Bill and changes to national policy will make community engagement even more crucial. It will also make it increasingly important to ensure that the community are informed and understand the importance of key infrastructure projects and developments
- The Localism Bill will enable local authorities and developers to utilise Green Belt land for new development – this should be recognised
- The Government is giving a clear steer that decisions such as whether to build on the Green Belt should be taken locally. Knowsley Council should no longer be bound by arbitrary targets for growth
- The Council’s proposals to build on Green Belt land do not meet aspirations for sustainable development as set out in the Planning and Compulsory Purchase Act 2004
- In order to comply with the requirements of Planning Policy Statement 12, the Council should consider allocating strategic sites for development within the Core Strategy, for example to the east of Halewood
- Planning Policy Guidance 2: Green Belts, states that exceptional circumstances should exist before building is permitted on Green Belt land – it is considered that no such exceptional case has yet been demonstrated by the Council

B1.3 National Planning Policy Framework (NPPF)

- The Core Strategy should directly address the Government’s “Plan for Growth” as set out in the 2011 budget. The draft National Planning Policy Framework presents this and other pro-growth messages in the form of national planning policy
- The draft NPPF represents a material consideration (in accordance with advice from PINs), but it is recognised that weight should also be attributed to the existing national planning policy before its adoption
- The final NPPF is likely to be in place before the Knowsley Core Strategy examination and therefore should be a material consideration in subsequent stages
- The main message of the draft NPPF for the Core Strategy is that development is essential to achieving the growth that Government policy promotes, and that a development plan should be just that - a plan for development. Development should be that which meets the needs of the future community and economy, and that is demonstrated to be required by evidence
- In respect of housing, the draft NPPF and other policy statements require local authorities to plan for an additional 20% percent of housing supply over and above existing housing targets – this should be considered.

B1.4 Regional / sub-regional policy context

- Reference should be made to the “Atlantic Gateway” concept, of which Knowsley Council is a partner
- Reference made to the Regional Spatial Strategy (RSS) is questioned given its intended revocation under the Localism Bill
- The proposed revocation of the RSS represents positive news for developers
- There are initiatives within Liverpool to encourage the growing of local food to reduce global warming and dependence on other countries for our food; the plans to build on farm land is therefore contrary to initiatives being promoted in nearby areas
- References to the Multi-Area Agreement for the sub-region should be removed
- References to the Action Plan for the Liverpool City Region 2008 – 2011 should be removed
- The Core Strategy should be fully linked to the Local Transport Plan 3 and its action plan
- This section provides a very useful hook for the Waste DPD, including that the document is given its own paragraph and also features in the policy framework figure

B1.5 Other Issues

- The Core Strategy’s proposals to build on open spaces would impact on local health levels, including air quality
- Natural England submitted comments on the Habitats Regulation Assessment, published as a supporting document to the Preferred Options Report

- Scepticism that the people who oppose development within the Green Belt are being listened to
- Residents of Whiston didn't get the opportunity to comment on previous stages of development of the Core Strategy

B2: Chapter 2: Knowsley – the Place

B2.1 Knowsley / Liverpool City Region context

- Support is given to the identification of the main issues which affect Knowsley's population, including out migration, limited housing choice and the importance of retention of economically active populations
- Support is given to the recognition of the role of Knowsley in supporting the Liverpool Super Port concept, and also references to the importance of Liverpool Airport and the Port of Liverpool
- Reference should be made to the "Atlantic Gateway" concept and where appropriate, shared objectives should be highlighted
- The Borough is unusually diffuse with a dispersed settlement pattern lacking a natural centre. Decisions to make Huyton the civic centre were never properly debated. Descriptions of the Borough as a "federation of communities" are redundant
- Inclusion of the Waste DPD is supported as this is beneficial to generating wider understanding of the DPD and providing necessary links between LDF documents

B2.2 Housing

- Support is given to the emphasis on the need to create a balanced housing market in Knowsley, meeting needs and demands, increasing the delivery of housing at sustainable locations
- The release of Green Belt land will help to create a more balanced housing market and provide higher value and/or family housing located adjacent to the urban area, hence tackling some of the opportunities outlined in relation to housing

B2.3 Employment

- Support is given for maximising regeneration opportunities and the utilisation of brownfield land
- The maximisation of regeneration opportunities in Knowsley Industrial Park should also recognise the opportunities offered by the regeneration of Knowsley Business Park. There should be consistency as to whether the Council considers these Parks as separate locations or a single regeneration area

B2.4 Town centres and shopping

- The identification of the priority of improving / increasing retail and leisure opportunities in town centres is supported

B2.5 Transport

- A modal shift away from car based transport should be encouraged
- The tool of green travel plans should be mentioned

B2.6 Green Spaces, outdoor sport and leisure in Knowsley

- Recognition of the importance of Green Infrastructure is welcomed, as all as the commitment to redressing the uneven distribution of greenspaces throughout the Borough
- Recognition of the role of greenspaces in health and wellbeing is welcomed
- The existing environmental assets and resources within the Borough should be detailed, in order to provide a baseline position for policies to build on
- Existing content could go further in recognising the importance of protecting and enhancing biodiversity and geodiversity, including for protected sites / species and also for assets outside of specific designations
- Wording should be changed from “protection and / or enhancement” to “protection and where possible enhancement” of the network of open countryside and greenspaces
- Reference should be made to how the creation or enhancement of existing green spaces can provide enhanced ecological functionality
- Public access to areas that are primarily managed for nature conservation can be of benefit to people's health and well-being
- The Council should consider undertaking a Strategic Flood Risk Assessment Level 2 to examine in more detail the critical drainage areas and areas which could be within the functional flood plain
- As surface water flooding incidents are prevalent in all major settlements, this should be considered a key issue for these areas
- The statement that Knowsley is well served by sporting and leisure facilities is not justified by evidence; evidence produced in 2005 must be treated with caution
- A new open space sport and recreation assessment and playing pitch strategy is required, and steps towards completion of this are welcomed
- Issues of uneven distribution of sports and leisure facilities should be mentioned in relation to each area of Knowsley, in accordance with an updated evidence base
- Contextual information regarding the current Leisure Strategy should be included
- Sport and improvements to health should be emphasised as a key link
- Terminology should be changed from “site of biological importance” (SBIs) to “local wildlife sites” (LWS) and from “site of geological importance” (SGI) to “local geological sites” (LGS)

B2.7 Built environment and heritage

- Support is given for the identification of conservation areas at risk, including that measures to tackle this are translated into policy. Positive and proactive strategies for the enhancement of the historic environment should be included

- Support is given for ensuring that the historic built and natural environments are not compromised by future development and that the local distinctiveness of the areas is enhanced

B2.8 Area specifics

- Key issues and opportunities for each township identified in this Chapter should better relate to the area priorities identified in Chapter 6. They could be combined to reduce length of the document and improve legibility
- The consultation document provides spatial portraits of parts of the urban area within the District, something which represents good practice in plan making

B2.9 Huyton and Stockbridge Village

- No specific points made

B2.10 Kirkby

- There is an identification of a conservation area at risk in Kirkby, but this is not followed through within the area priorities section
- Kirkby is a free-standing town but the gap between the town and Liverpool has been eroded by the Strategic Investment Area that has allowed large warehouse development up to the boundaries
- The profile of Kirkby is unrealistically negative, given recent successes in reducing the number of job seeker's allowance claimants, provision and protection of jobs, and reducing crime rates
- The recognition of the importance of the protection and enhancement of the Valley corridor within Kirkby is supported

B2.11 Prescott, Whiston, Cronton and Knowsley Village

- The recognition of the role of Knowsley Business Park north of Knowsley Village is supported. Further detail should be provided within the Core Strategy to allow any future development within the Business Park sufficient flexibility to ensure mixed use schemes can be secured as a means to enhance the current offering
- Support is given to improving the quality, choice and affordability of housing in this area. However, there are concerns about the initial focus being solely on the area at South Prescott
- Improving the cultural and leisure offer in Knowsley's centres seems to be aimed at Huyton and Kirkby, not at Prescott

B2.12 Halewood

- Halewood suffers from a shortage of 3 and 4 bedroom properties in the private sector, and 2 and 3 bedroom properties in the affordable sector. A significant housing development could help address these issues
- That the Council should seek to 'promote a mixed and balanced housing offer in Halewood, including affordable housing' is strongly supported

- Advantage should be taken of the close proximity of Halewood to employment areas in South Liverpool and the existing Jaguar Land Rover employment site
- Support is given for the recognition of existing sustainable transport links (such as the Trans Pennine train line and Halewood Station) as valuable opportunities
- The identification of the importance of the expansion of Liverpool Airport, including the provision of the proposed Eastern Access Transport Corridor near Halewood, is supported
- Enhancing the existing connections between Halewood and the rest of Knowsley and the wider Liverpool City Region via an efficient sustainable local transport system, would also be very beneficial to the area
- Halewood has not been dealt with correctly within the spatial strategy, including failure to attach enough significance to the future role of Halewood amongst the different parts of the district, for both housing and employment, and in part a consequence of the Council's misdirection through the errors of the Green Belt review
- The release of Green Belt land will help to create a more balanced housing market and provide higher value and/or family housing located adjacent to the urban area in Halewood
- There are various positive characteristics of the area which indicate that a significant part of the development taking place in the District ought to be at Halewood. Additional well planned and integrated development would also assist in regeneration in Raven Court and the need to improve quality of local greenspace

B3: Chapter 3: Vision and Objectives

B3.1 Spatial Vision – support

- The Spatial Vision is supported along with Strategic Objectives 5 and 8.
- The Spatial Vision is generally supported and broadly sets out the correct priorities. Particular support is given to the aim of providing a wide choice of housing to meet local needs and creating a housing offer and safe, vibrant and cohesive communities which will attract residents
- The commitment to provide a wide choice of housing is welcomed
- The spirit of the Vision is supported, alongside the explicit recognition of the links between open space, sports and leisure facilities with active and healthier lifestyles. It should be added that active lifestyles, including access to sport and recreation, can play a central role in relation to quality of life and sustainability
- Support is given for the references made to sustainable transport, open space, recreation opportunities, landscape character, biodiversity / geodiversity, and multi-functional green infrastructure
- The statement that 'New housing will be provided in sustainable locations, be well-designed, affordable and form attractive and identifiable neighbourhoods where residents choose to live' is strongly supported.

- The role of housing is of fundamental importance in meeting the wider aims and objectives of the Core Strategy, particularly those related to building a stronger and more diverse economy. The Borough's housing offer and the provision of a range of housing, will be key to delivering and sustaining economic growth and particularly in attracting the skilled workers which Knowsley will critically need to deliver growth
- Support is given for the statement that Knowsley will provide a wide choice of housing to meet local needs. It is considered that sites to the east of Halewood will provide a choice of housing types and tenures in a sustainable location and can provide an element of affordable housing in accordance with policy requirements
- The aim of ensuring that communities will be better connected to local employment opportunities, health care, education, shopping, leisure and recreation provision is supported
- Support is given for the content of the Vision that relates to the District Centre of Halewood. In order for the redevelopment of the District Centre to come forward, additional housing will need to be provided within Halewood. This will allow such redevelopment proposals to be viable and provide a critical mass of residents to support the town centre (particular those living within aspirational family type homes)

B3.2 Spatial Vision - objection

- There is no long term vision on infrastructure when housing estates are created
- The vision is flawed as building on the Green Belt gaps will merge Knowsley into other parts of Liverpool and St Helens
- There is no specific reference to environmental quality or any waste-related/resource efficiency type issues within the vision statement. The Council should clarify this matter.

B3.3 Spatial Vision – additions and changes

- Support would be given to an additional reference to the provision of open space within new housing development and climate change
- At present the Vision only refers to heritage and biodiversity in relation to rural areas. This needs to be amended to recognise the importance of heritage and biodiversity across Knowsley, including in urban areas
- The Vision refers to rural landscapes as do the Area Priorities for the Halewood area, therefore the inclusion of a landscape policy which summarises the important aspects of the character of Knowsley's landscapes and how these will be protected and enhanced, is requested
- The Vision should acknowledge the importance of enhancing the range and quality of supporting functions within Knowsley Business Park as a means to strengthen and diversify Knowsley's economy
- The recognition is welcomed that Knowsley will seek to provide a wide choice of housing and that it will be provided in sustainable locations. However, the type and location of new housing should reflect market demand, as well as identified needs. There is a need to provide a

broader range of housing, including larger family housing on attractive sites in good market areas e.g. in Prescott.

- In order that the vision supports the provision of a wide choice of housing to meet local needs, the Council will need to ensure that the type of major development which will provide this wide choice of housing is permitted in sustainable locations. Strategic allocations which have a strong relationship to the current urban area should be promoted in order to deliver significant short term and long term benefits that other projects cannot achieve
- The vision should give greater regard to the economic, social and environmental benefits that can accrue as a result of new housing development, including short term and long term job opportunities, Community Infrastructure Levy (CIL) payments and the New Homes Bonus Scheme.
- In order to ensure the vision for transport is met, it is suggested that the Council allocate strategic sites in sustainable locations, which take full advantage of the existing employment areas and community infrastructure. For example, Halewood benefits from links to employment sites, community facilities, recreation provision and transport links.
- The need to focus on delivering regeneration within areas such as Kirkby, North Huyton and Stockbridge Village is recognised. However, other areas of the Borough, and particularly those with stronger housing markets, such as South Huyton, offer more certainty over delivery, should not be marginalised as locations for housing growth.
- The wording of the final part of the Vision could be improved by beginning with an overall sentence along the lines of 'the natural resources and environmental assets of Knowsley will be protected and enhanced, including...' - this would give the section more focus as at present it reads as a slightly disjointed list of environmental issues to be addressed with no overall focus linking the themes mentioned
- The wording in the first sentence of the last paragraph should read 'The character and quality of landscapes will be protected and where possible enhanced...'
- The Vision refers to "areas of biodiversity and geological importance", which is supported. The Vision should also acknowledge the role of creating networks and supporting biodiversity over the wider landscape. The last sentence should be rephrased as: "The character of Knowsley's rural landscapes and the villages of Cronton, Tarbock and Knowsley Village will be maintained. The rural areas will provide distinct breaks between Knowsley's townships, and good public access for informal countryside recreation and opportunities for formal recreation. Knowsley's ~~areas of biodiversity and geological importance~~ *heritage* together with buildings, structures and areas of historic and cultural importance will be protected and enhanced, contributing to Knowsley's environmental quality and distinctiveness".

B3.4 Strategic Objectives

- Support is given for the Strategic Objectives which provide overall a strong sustainable framework for the Core Strategy

- The Strategic Objectives are broadly supported, and the explicit objective of improving access to leisure, sport and recreation facilities (amongst others) is welcomed. Quality of facilities, alongside access, including quantity of facilities, should be mentioned.
- Given the challenge around housing land supply, it is felt that objectives should refer to protection of existing open space, sports and recreation facilities. It is recognised that PPG17 offers some protection, but local policies based on audits and assessments of needs are required in order to ensure that provision is appropriate, that deficiencies / surpluses are addressed, that spaces / facilities of high quality or value are protected, and that appropriate developer contributions can be sought.

B3.5 Strategic Objective 1: Sustainable Economic and Employment Growth

- Maximisation of regeneration opportunities is supported. The reuse of vacant property and emphasis on brownfield sites within the document is of great value
- This objective is supportive of the Waste DPD indirectly

B3.6 Strategic Objective 2: Well-Balanced Housing Market

- Strategic Objective 2 is welcomed, which seeks to promote a well balanced housing market throughout Knowsley, including larger executive housing, with a view to attracting new households to settle in Knowsley
- The emphasis given to creating a balanced housing market, meeting needs and demands, increasing the delivery of housing at sustainable locations is welcomed
- Strong support is given to the supporting text for this objective which states that housing growth is needed in Knowsley to address the imbalances in the Borough's housing market
- Support is given for seeking to provide a sufficient quantity and mix of high quality sustainable housing in appropriate locations to meet needs and demand. The supporting text confirms that there is a shortage of a number of types of housing, including large executive homes. The release of Green Belt sites to the east of Halewood could provide a mix of housing types and tenure, including larger detached homes.
- Knowsley is in the top four in the UK for House repossessions. Therefore the Council have got this wrong in the past and in this strategy

B3.7 Strategic Objective 3: Regenerate and Transform

- It is questioned whether regeneration into vast housing estates is what residents want

B3.8 Strategic Objective 4: Distinct, Viable and Sustainable Town Centres

- Support is given to policies to increase and/or improve upon retail and leisure opportunities within town centres, attracting new and improving existing facilities to create better choice and variety

- If the regeneration of Halewood District Centre is to take place, there needs to be a demand for these services which can only be released through new development within Halewood and in particular, new residential development

B3.9 Strategic Objective 5: Quality of Place

- The Council should consider the history of Whiston and should not build on what little is left of the Willis Estate
- Support is given for policies which ensure that the historic built and natural environments are not compromised by future development and that the local distinctiveness of the areas is enhanced

B3.10 Strategic Objective 6: Sustainable Transport

- The inclusion of Strategic Objective 6 which targets the use of more sustainable modes of transport is supported
- Strong support is given for the encouragement of a modal shift away from car based transport and also for policies which promote sustainable transport. It is recommended that green travel plans are included within this section
- The firm start within the Issues and Options Paper regarding an objective for transport has been built upon further by assertion of the value of the current Merseyside Local Transport Plan 3 (LTP3). Linkage between LTP3 and implementation plans of the Merseyside district authorities would help to facilitate more effective integration of land use and transport planning

B3.11 Strategic Objective 7: Manage Environmental Resources

- There should be a prudent focus on the environment and hence no building on Green Belt at Whiston
- The inclusion of this Strategic Objective is welcomed, which endorses the prudent use of natural resources and the tackling of climate change
- It is recommended that this objective should also mention sustainable drainage systems and reducing water pollution which is a known issue in some areas of the borough
- The supporting text for this objective should include water, as this needs to be used efficiently

B3.12 Strategic Objective 8: Green Infrastructure and Rural Areas

- This objective is contrary to proposals to build on Green Belt land across Knowsley
- This objective goes some way to covering issues relating to the natural environment, but this should be made more comprehensive by endorsing the conservation and enhancement of specific environmental assets including biodiversity, geodiversity and the landscape
- This section should include links to other relevant strategic objectives that benefit ecological connectivity and functionality between existing nature conservation areas within, and adjacent to the borough, ideally also mentioning and promoting the value and benefits of watercourses as wildlife corridors

- The objective should strengthen the focus on multifunctional benefits that developments can bring, including the potential for implementation of measures for offsetting the physical impact of developments on a case-by-case basis
- Reference should be made to the Liverpool City Region Ecological Framework and recognition made of the part Knowsley plays in delivering wider sub-regional strategic objectives.
- Specific changes are recommended to strengthen the approach to green infrastructure, biodiversity and the character of rural settlements.
 - Objective 8 Biodiversity: To enhance the biodiversity of Knowsley's urban and rural areas, by identifying and supporting ecological networks, sites of importance and areas for potential habitat restoration or creation
 - Objective 9 Rural Areas: Maintain the open character of Knowsley's rural areas and the distinctive character of rural settlements including Cronton, Tarbock and Knowsley Village
 - Objective 10 Green Infrastructure: To support and enhance Knowsley's Green Infrastructure and promote its role in supporting the other strategic objectives, particularly Regenerate and Transform, Quality of Place, Sustainable Transport, Manage Environmental Resources, Enhance Biodiversity and Rural Areas

B3.13 Health and Wellbeing

- This objective is recognised in the document as being one of the highest priorities, but there is no specific strategic objective to achieve this. Instead, the objective is described as a cross cutting theme. It is felt that the priority of the aim would be better reflected by making it a specified strategic objective.

B4: Chapter 4: Towards a Spatial Strategy

B4.1 Spatial Strategy influences

- The proposals draw heavily on the demands laid down by the Regional Spatial Strategy and yet it is acknowledged that this document is in effect redundant with plans by the current government to revoke the strategy when the Localism Bill becomes primary legislation – this is problematic
- National policy is currently in a state of flux. There are clear steers that matters such as whether to build on the Green Belt should be taken locally. Knowsley is therefore not to be bound by arbitrary targets set by central government. Equally, Knowsley shouldn't try to bind itself with such targets, when considering options for a spatial strategy

B4.2 Options A, B and C

- Support is given for the spatial strategy for Knowsley, including the focus on Option C
- The spatial strategy is supported insofar as it accepts the need to identify areas within the Green Belt to meet, in part, the housing needs of Knowsley. Option C is supported as a very minimum measure to

ensure the delivery of the housing target of 7650 homes over the plan period.

- Support is given to the preferred approach which is a combination of Options B or C. This is good as this focuses development onto existing main settlements which are more accessible than the more outlying areas but with limited expansion into Green Belt to meet future needs
- The Council's intention to incorporate Option C in its Preferred Spatial Strategy is welcomed, accepting that there is limited land available within the existing urban area to satisfy housing need through to the end of the plan period
- Support is given to Option C which was the only option the Council viewed as capable of meeting all of the development needs of the Borough through to the end of the plan period, i.e. 2027. It is agreed that aspects of this option should be mitigated by ensuring that the location of new development in the Green Belt is within the most appropriate and sustainable areas, which strong relationships with the existing urban area. For example, land adjacent to the existing settlement of Halewood would prove ideal to achieve these objectives.
- Option C was the only option capable of meeting all the development needs of the Borough over the plan period. There has been an over reliance on housing development within urban regeneration areas generally and within Knowsley in particular which has been a factor in the Council now considering the release of Green Belt land. The Council should promote sustainable urban extension within the Borough as this will not only readdress the housing imbalance but will also accord more closely with the Government's 'pro-growth' agenda. This requires Councils to take a proactive approach when considering development proposals and also to plan positively for growth.
- A hybrid between Option B and Option C would provide more flexibility as to the future choice of sites for release for development, including those currently in the Green Belt
- Support is given to the principle of combining elements of Option B 'Focussed Regeneration' and Option C 'Sustainable Urban Extensions'. However, in order to meet housing needs, there is an urgent case for bringing forward sites which are genuinely deliverable at an early date and this cannot be achieved by relying solely on a strategy of focussed regeneration in the short term.
- A clear preference for Option C has been expressed and this ought to be translated more explicitly as there is a risk that deliverable sites will be held back unnecessarily, with harmful social and economic consequences
- In general, the protection of Green Belt land is supported, as these areas can provide valuable open space on the urban fringe with associated benefits including recreation, human health and enjoyment and biodiversity conservation. However, some Green Belt land is of poor quality and therefore a stringent policy of avoiding any development on Green Belt land can increase pressure for development on land that may be more environmentally sensitive. Some Green Belt land can and should be enhanced to provide more greenspace benefits.

- Where Green Belt is to be reviewed there should be no net loss, and development on any areas removed from the Green Belt as part of a review should itself provide greenspace, so bringing about a net gain in greenspace.
- Further reference should be made to the Draft National Planning Policy Framework, including the presumption in favour of sustainable development and the need for Local Planning Authorities to provide five years worth of housing against their housing requirement and in addition, to include an additional allowance of at least 20% to ensure choice and competition in the market for land. Therefore the housing need is far greater than that which has already been acknowledged by the Council
- Any option that includes expansion into the Green Belt areas will have a negative effect on the environment and the surrounding areas. Knowsley is a green area which is why a number of people choose to live within Knowsley rather than the 'urban' environment of Liverpool.
- The recently published DEFRA White Paper on the Natural Environment should be mentioned with regard to Option C as it promotes the use of carbon offsetting and local partnerships to secure sustainable development
- In addition to ensuring that the actual locations of new development in the Green Belt are the most appropriate, a further mitigation option would be to provide a financial incentive for the redevelopment of 'previously developed' land

B4.3 Evidence base studies and technical reports

- It would be prudent to add the LCR Ecological Framework to the LDF evidence base
- That a review of the open space, sport and recreation assessment is in preparation is welcomed.

B5: Chapter 5: Preferred Spatial Strategy

B5.1 Preferred Policy Option CS1: Spatial Strategy for Knowsley

Table 9: Preferred Policy Option CS1: Spatial Strategy for Knowsley	Total	%
Supportive Comments	10	32%
Non Supportive Comments	4	13%
Other Comments	17	55%
Total Comments	31	100%

B5.2 Spatial Strategy – Preparation

- The Council has already agreed that Option C will form part of the Council's Spatial Strategy. The wording should therefore confirm that there will be a need for Green Belt land release in order to meet the vision and Strategic Objectives of the Core Strategy

- The role of spatial strategies and the way that they are to be prepared are explained in both PPS1 and PPS12. The Council has set in place the basic evidence to apply the proper approach. It has identified parts of the urban area with their own centres as 'townships' and for each of these, in accordance with good practice in plan making, has set out 'spatial profiles'. However, there is no evident connection thereafter between what is noted as the characteristics of the townships, and the amount of development that is directed to each of the townships. A basic and vital stage is absent from the process being followed in making the plan and this casts considerable doubt over the soundness of the preferred strategy. It is evident that Green Belt has been a primary consideration in the distribution of development. The total amount of development needed has been distributed according to the capacity within the urban area, followed by the use of the capacity available in the edge of settlement locations selected on the basis of the least harm to a very narrow and simplistic interpretation of their importance to Green Belt purposes. The Council has therefore departed from the spatial planning process set out in current policy guidance and which is set to be reiterated with NPPF
- The plan allows the Green Belt to determine the location of the development that will necessarily take place beyond the existing urban edge to far too great a degree. The spatial strategy should establish the broad distribution of development first, and do so having regard to the location and role of the main centres, the economic potential of places, future population structure, the need for affordable housing, the relationship between jobs and homes, the availability of facilities and services, movement patterns and the level and equity of accessibility. How the level of development, primarily housing and employment accommodation, is achieved and from which sources of supply - whether within the urban areas or on the edge of settlements - should be the second step. Only when there is an overwhelming problem created by seeking to accommodate too much development in relation to a particular centre should a further iteration change the overall distribution
- The Preferred Options consultation document appears to distribute the residential provision in a proportionate way, that is, Halewood represents 15% of the population of the District and the dwelling provision for Halewood proposed in the plan is 15% of the total District provision. This does not amount to a strategy as there is no conscious shift in the existing situation proposed to address what the evidence says about parts of the District at present, or to help bring about any particular role for Halewood in the future. A greater proportion of the plan's District housing provision should be directed to Halewood
- The Core Strategy plan period only runs to 2027, it is questioned whether this should be extended in light of the Core Strategy timescales and the requirement in PPS12 for the time horizon of the Core Strategy to be at least 15 years from the date of adoption

B5.3 Spatial Strategy - General

- The strategic direction set by the Core Strategy should be a balanced and sustainable development approach towards integrating land use and transport, regeneration and economic development, social inclusion, and help tackle climate change
- That the housing stock needs to be re-balanced by providing a wide choice of new market sector and affordable housing with supportive services and facilities appropriate to needs is supported
- Support is given for the Spatial Strategy and particular its focus on delivering development within existing urban areas. The urban area is already well served by existing infrastructure and well connected to key areas of activity, including town centres and other areas of service and employment concentration. Focusing development within the urban area represents a sustainable approach to delivering growth and is wholly consistent with principles of PPS1
- It would have to be demonstrated that any potential development impacts do not adversely impact upon the strategic road network. It is realised that the latter consideration has to be fairly balanced with the needs of urban regeneration. However, potential developers should be required to assess traffic impacts via transport assessments including travel plan consideration. This is necessary in the interest of maintaining an efficient and safe strategic highway network
- The Council's spatial priority should be to create more open spaces, not less
- Knowsley is one of the most deprived Boroughs in the country, and the aspirations for growth and development set out in the Core Strategy can be seen in this context
- This policy approach is broadly compatible with the Waste DPD.
- Support is given for the identification of the importance of maintaining the character of Knowsley's rural landscapes and the villages of Cronton, Tarbock and Knowsley Village
- Support is given for the objective of maintaining the position of Huyton within the settlement hierarchy and therefore as a sustainable location for growth. Huyton is the largest town within the Borough, is the principal centre, contains a critical mass of existing service and employment and is well served by existing infrastructure.

B5.4 Spatial Strategy – brownfield, greenfield and Green Belt Land (see also CS5)

- The emphasis on development within urban areas and the efficient and sustainable use of land and infrastructure should be strengthened to ensure that priority is given to the efficient and effective use of previously developed land within urban areas, ahead of greenfield sites
- Further encroachment on the Borough's Green Belt areas should be resisted wherever possible and new developments should use brownfield and former residential / industrial land
- More detail should be provided on brownfield land reclamation and redevelopment, as there may be sites which would be considered to be highly appropriate for housing development, such as currently

unidentified vacant or soon to be vacant brownfield sites within the urban area

- There is concern that the necessary processes for ground preparation should be effectively carried out and monitored where potentially dangerous processes or substances remain from previous industry
- Support is not given for identified Greenfield land to be used for housing development, especially as it contains a substantial part of the local flood plain
- The emphasis should be on development within and adjacent to the existing urban area, in order to cater for the full range of housing need/demand and support the local economy. The case for an early Green Belt review is supported, recognising that Knowsley's urban area is constrained in terms of housing land availability
- It is essential that a rigorous and considered approach to the review of Green Belt boundaries is undertaken in order to ensure that the release of land from the Green Belt does not impede or restrain urban regeneration
- Support is given for the spatial strategy, especially the commitment to a review of Green Belt boundaries. Agreement is given with the Council's position that there is no alternative if identified development needs and demands are to be met
- Considerations for Green Belt land release should start with achieving a sustainable and deliverable pattern of economic development for Knowsley through the identification of sites which will enhance the competitive advantage of Knowsley and the Liverpool City Region and only then examine the impacts arising from the development of these sites on the purposes of including land in the Green Belt
- The spatial strategy and the proposed review of Green Belt boundaries to meet longer term needs for housing and employment development is in accordance with the Government's pro-growth agenda and also with the Council being unable to provide sufficient housing land to meet demand over the plan period.

B5.5 Spatial Strategy – Identification of Principal Regeneration Areas / other areas

- Support is given for the identification of the Tower Hill area as a priority regeneration area
- That Green Belts in Cronton will be safeguarded is welcomed
- The Council should identify alternative sites for mixed use schemes that have the capability to compete with the existing Kings Business Park and also draw in new investment from the wider Liverpool and Manchester regions. Therefore the identification of both Knowsley Industrial and Business Parks as a Principal Regeneration Area where development and regeneration can be maximised, is supported
- The Council's intention to rebalance the existing housing stock by providing a wide choice of new market sector and affordable housing in the Borough is supported. The area to the east of Halewood could provide a mix of types and tenures of housing and include affordable

housing. If this site was developed it would increase to demand for as well as viability of improved services within Halewood District Centre

B5.6 Suggested additions / changes

- The Core Strategy should include a statement that, as part of taking forward any urban extensions or other large-scale development / redevelopment proposals, it will be necessary for any sterilisation effects on the coal resource to be considered, as well as whether the prior extraction of the coal would be appropriate
- The Core Strategy should include a statement that, as part of taking forward development proposals within these areas, it will be necessary for the mining position and ground conditions to be fully considered and addressed
- The sentence relating to the application of the Principal Regeneration Area policy in other areas, subject to funding, should be deleted as it creates uncertainty in a key strategic policy. If further areas justify designation as Principal Regeneration Areas, the Council should make a formal amendment to Policy CS1 in the future.
- Support is given for the Council's intention to review Green Belt boundaries to meet the longer term needs for housing and employment development in the Borough, but this element of Knowsley Spatial Development Strategy should be reworded to be much more positive in relation to the release of Green Belt sites.
- The Knowsley Older People's Strategy - 'A Positive Age' details improvements to enhance life for older people in Knowsley; there is a real opportunity now to ensure that some of these ideas are incorporated in the Core Strategy as the Council develops plans for the Borough for the next few years
- High priority should be given to the economic development of the Borough. The following wording should be added:
 - "Enhance existing employment areas and provide a wide range of sites and premises for new employment development."
- The policy as set out is too broad insofar as it states that opportunities for development in the Priority Regeneration Areas will be maximised without any limitation or proviso, such as the protection of important greenspaces. For this reason, reference to 'development' should be deleted so that it now states:
 - "Opportunities for regeneration within the following Principal Regeneration Areas will be maximised."

B5.7 Key Diagram

- The identification of the Principal Regeneration Area at South Prescot is welcomed. The identification of Location 5 as a location reserved as an urban extension is a major concern, as this will undoubtedly impact on the regeneration prospects of the South Prescot Principal Regeneration Area. This element should be reconsidered with priority being given to the use of Green Belt as a strategic tool to encourage urban regeneration. Whilst the need for some Green Belt land is recognised, it would offer a much less sustainable and environmentally sound option to South Prescot Regeneration Area.

- It is questioned why Whiston has got the largest proposed expansion into Green Belt land for the development of housing, and then after 2027, bigger commercial development, when the areas of the old Pirelli and cables factory in Prescott have not been fully developed yet.
- There will be no Green Belt in Whiston/Cronton to link to as commercial sites may occupy these linked spaces. A path along a disused railway line does not support the rich ecosystem of plants and animals that currently live in the Halsnead Park area.
- The Key Diagram would benefit from the inclusion of the Strategic Opportunities areas to fully support the Ecological Framework and show where there are current assets and opportunities
- There is concern that Location 7 may be described as the flood plain for the River Mersey. Flooding has occurred on previous occasions in spite of a drainage system being installed hence there is concern that the proposed developments would increase the risk by reducing the area of absorption of the water. Assurances would be given that the development of this area would be of low to medium density, adequate room sizes, no higher than two storeys, accompanied by adequate off-road parking adjacent to the properties and developed alongside recreation facilities within the estate.
- Concern is stated about proposal 8 on the map, and to a lesser extent about proposal 9.
- The map within the Local Development Framework shows no clear boundaries of the sections of Green Belt land which are under threat of development, i.e. roads, properties, etc.
- The Key diagram should not show land surrounding Widnes as Green Belt unless and until an appropriate assessment had been undertaken and agreed with Halton Borough Council
- Support is given for the inclusion of diagrammatic reference to the possible Eastern Access Road for Liverpool John: Lennon Airport
- Consideration should be given to the inclusion of the now jointly consented access road to the 3MG site (Widnes)
- On the various maps included within the consultation document the Eastern Access Transport Corridor is incorrectly referred to as the 'Potential Airport Link Road' – this should be labelled accurately
- Support is given for the identification locations to the east of Halewood reserved for urban extensions within the plan. This area is deliverable within the early part of the plan period and that there are no constraints to its development.

B5.8 Preferred Policy Option CS2: Development Principles

Table 10: Preferred Policy Option CS2: Development Principles	Total	%
Supportive Comments	3	43%
Non Supportive Comments	0	0%
Other Comments	4	57%
Total Comments	7	100%

--	--	--

- Support is given for the strong approach to sustainable development within strategic policy CS2, which is taken forward in more detailed policies particularly CS19, CS22 and CS23
- This is an umbrella policy which sets the framework for much of what follows in these areas and is supported
- This is a high level policy with limited detail but providing welcome profile for climate change mitigation and adaptation and carbon emissions specifically, resource (including water) efficiency and flood risk and protection of water, land and soil quality.
- The Development Principles are supported, particularly those related to the environment, local character and quality of place
- CS2 supports and is compatible with the Waste DPD and promotion of waste as an employment use, and is compatible with the vision, strategic objectives and sustainable waste transport policy within the emerging DPD.

B5.9 Preferred Policy Option CS3: Housing Supply, Delivery and Distribution

Table 11: Preferred Policy Option CS3: Housing Supply, Delivery and Distribution	Total	%
Supportive Comments	5	13%
Non Supportive Comments	7	18%
Other Comments	26	68%
Total Comments	38	100%*
*figures rounded, hence do not total 100%		

B5.10 General

- The emphasis given to creating a balanced housing market, meeting needs and demands, increasing the delivery of housing at sustainable locations is welcomed
- Housing is just one element of many that go towards creating sustainable communities. All the various elements are of equal importance e.g. health, education, shops, community facilities, etc. Delivering houses and not communities will just create dormitory suburbs and towns and so lead to greater and longer distance commuting; this will then have significant implications for the transport infrastructure
- A minimum density target of between 30 and 40 dwellings per hectare is not supported. The Council should ensure that density on new development sites remains flexible and therefore should not impose a minimum target. Each site put forward for development should be assessed on its own merits to ensure the best range and mix of housing is provided
- There is a strong case for encouraging lower densities in Knowsley in order to help re-balance the housing market. A more flexible approach is required which would involve an assessment of each scheme on its

merits, having regard to the character of the surrounding area, the constraints of the site and evidence of need / market demand

- Support is given to the Council's intention to rebalance the housing market to better meet with needs and demands of these communities. There is a need for aspirational and larger family homes.

B5.11 Housing needs and targets

- The Knowsley Housing Needs Assessment 2009 showed little increase in the population over the next 20 years.
- Recent news items have shown Knowsley in the top ten for house repossessions, so why do we need more housing if we can't afford the ones already built?
- There are still many houses in Prescot on the old BICC site which lie unsold. This proposal therefore is short sighted and only meets the requirements of developers and not the community
- Knowsley has developed hundreds of houses around the borough in recent years and a number are still unoccupied particularly in Prescot
- Objection is made to the housing target on the basis that it does not make any allowance for the shortfall in net housing completions since 2003. As the Core Strategy is still required to be in general conformity with the Regional Spatial Strategy (RSS), due to High Court rulings, the policy should be amended to make an additional allowance for the backlog of unmet net additions to the housing stock.
- Will these plans (and targets) be revised when details of the 2011 Census are available, which may alter the forecast of population growth significantly?
- There is potential concern about population change, leading to overcrowding and congestion, particularly with continued migration, and potential impacts on food, quality of life, accessibility of green and open spaces. The Council should be addressing this far more important factor at a local level rather than a Core Strategy where another 7,000 new houses are to be built, plus the provision of sites and premises for new employment development.
- It is acknowledged that in setting the housing target for the Borough a balance will need to be sought between the level of housing growth to be planned for, and the impacts on the Knowsley Green Belt. Sites identified for potential release need to be considered carefully in respect of whether release of individual sites would or would not erode the purposes of the Green Belt in that location as specified by PPG2. It is clear that there are a number of potential Green Belt sites that satisfy the various tests of PPG2 for release which can potentially accommodate more growth than has currently been targeted for.
- Support is given for the proposed overall strategic housing requirement of 7,650 new dwellings net of clearance. This figure is consistent with the findings of the most up to date evidence regarding housing need, including that which informed the production of RSS. Consistent with Policy L4 of RSS and in the spirit of the Government's Plan for Growth agenda, this figure should be treated as a minimum housing requirement; this should be reflected in the wording of CS3

- Objection is made to the housing target set at an annual average of 450 dwellings per annum and the suggestion is made that this section be reworded to an annual average of at least 540 dwellings per annum over the plan period. This represents an additional 20% over the RSS figures
- It is agreed that the release of approximately 11,000 Ha of Green Belt land to accommodate an annual housing target of 1,048 would not necessarily be appropriate or sustainable; however, it is considered that due to the existing backlog and the massive housing demand as identified by the SHMA, that a higher figure of 525dpa would be more appropriate. The higher figure would also be more appropriate as the projections based on the proposed housing target do not take into account the shortfall in housing delivery experienced in Knowsley since 2003. There is already an existing deficit of over 1,500 homes, which has been further compounded by the recent historically low housing delivery
- The wording of this section could be much more positive and encouraging for developers and would therefore align more closely with the Governments 'pro-growth' agenda and the NPPF

B5.12 Housing land supply

- It is considered that the Council has over-estimated the likely deliverability of sites identified by the Strategic Housing Land Availability Assessment (SHLAA) but the degree of shortfall cannot be quantified from the current information. That a discount has been placed on the total supply to recognise potential non-deliverability is welcomed, as this is in accordance with the guidance set out in the draft NPPF
- No contribution to housing supply should be assumed for urban greenspace, Council asset reviews, increasing residential densities, conversions, re-use of empty houses and changes in vacancy rates, or contributions by neighbouring authorities. Beyond the contribution already included within the SHLAA, any contribution of these sources within the plan period is highly speculative and uncertain, and should not be relied on for policy-making. In addition, no allowance should be made for potential re-allocation of employment land for residential uses.
- Objection is made on the basis that the policy should seek to ensure a minimum five year supply of housing land is maintained, plus an allowance of at least 20%, to ensure compliance with the draft National Planning Policy Framework
- The footnote relating to five-year supply should be amended to read at least 540 dwellings in line with the Governments Draft NPPF which requires Councils to plan for at least 20% over existing housing targets
- It is considered unlikely the Council will be able to demonstrate a five year housing land supply at present based on housing land supply within these regeneration priority areas. As a result, the Council should provide a mechanism for releasing Green Belt land for residential development that has been identified as a reserved location

B5.13 Distribution of new housing

- Support is given for the preferred Option CS3, in particular the indicative distribution of new housing
- As far as possible development that cannot be accommodated satisfactorily within the urban area should come forward in mixed use urban extensions in accessible locations well related to the existing communities.
- The fact that the boroughs population is located on one third of land in the borough is a potential problem for CS3. Evidence indicates that Kirkby has seen unprecedented levels of house building over the past 20 years and not seen since the 1950s. The deliverability of the policy should be considered as part of the Core Strategy examination.
- The identified distribution of housing across the Borough is supported, including 40% to be delivered within Huyton and Stockbridge Village. This reflects Huyton's position within the settlement hierarchy and its ability to support growth in a sustainable manner. The need to deliver the regeneration of North Huyton and Stockbridge Village as part of the overall objective of delivering a more balanced housing market is not contested. However, in order to deliver a truly balanced market across the whole of Knowsley, the Core Strategy must support limited housing growth within stronger housing market areas, e.g. South Huyton. This will assist in growing the stock of higher value housing in Knowsley
- There are significant reservations about the ability of weaker housing market areas such as North Huyton and Stockbridge Village, to deliver the overall level of housing growth allocated to the area (i.e. 3,060 dwelling net of clearance). Many sites within these areas are constrained by their historic uses and the viability of their development, particularly in the current economic climate, is marginal. Failure to deliver sufficient levels of housing within the urban area will put the Council under pressure to release less sustainable sites. To avoid this pressure and the resultant unsustainable spatial pattern of growth, it is vital that the Core Strategy supports targeted growth in more stable housing market areas which provide more certainty of delivery
- Objection is made to the over-reliance on Huyton and Stockbridge Village for housing delivery that is not justified by the evidence base. In order to cater for the full range of housing needs and ensure a continuous supply of deliverable housing sites, Prescott, Whiston, Cronton, Knowsley Village and Halewood should be identified for a higher share of growth
- Knowsley must address its growth needs as a whole, looking at the future needs of the Borough, as well as current needs. As the urban area is relatively constrained, sustainable development on land adjoining the urban area, such as in Halewood, would help to address this issue and ensure a sufficient amount of land for housing in the future.
- Broad support is given to Preferred Option CS3, however it is suggested that the broad indicative distribution of new housing development to be delivered should provide a greater proportion within the area of Halewood. The Preferred Options consultation document appears to distribute the residential provision in a proportionate way.

Though the actual numbers are not made explicit, the Core Strategy proposes 7,600 dwellings for the District over the plan period with 1,147 dwellings in Halewood. This does not amount to a strategy, as there is no conscious shift in the existing situation proposed to address what the evidence says about parts of the District at present, or to help bring about any particular role for Halewood in the future. A greater proportion of the plan's District housing provision should be directed to Halewood in the plan than would simply maintain the existing pattern

- The overall Borough provision should be at least what it is, and could be higher to reflect the appropriateness of provision at Halewood, and the attractiveness of Halewood to the market, the growth agenda of the Draft NPPF, and the practicality of meeting the '5 year supply plus 20%' rule which is approaching
- Objection is made as the distribution of housing for Halewood should be much higher. CS1 confirms the existing settlement hierarchy and places Halewood as a larger suburban centre. Given this, it is unclear as to why Halewood should not have at least as much planned housing as Kirkby at 20% given the lack of evidence presented by the Council to support this. Therefore, the planned distribution of 15% of total new housing for Halewood should be amended to at least 20%. These figures should also be seen as indicative only and as a guide to developers

B5.14 Housing and Green Belt / other housing sites (see also CS5)

- Support is given for the conclusion of the Council that significant Green Belt releases are required to meet any reasonable housing requirement for the Borough
- The need for an immediate, major boost in housing development in Knowsley is critical. To achieve this, appropriate release of some Green Belt sites must be considered. The site adjacent to the proposed Epicentre NW at Knowsley is not only felt to be appropriate for release, but would also assist in delivering significant investment and jobs into the area, that would benefit the local community and Borough as a whole
- The Core Strategy proposes a release mechanism to manage the switch of housing development location from urban area to Green Belt. However, there are number of concerns as to how the release mechanism is proposed to operate
- The Council should not consider land in the Whiston area as potential sites for housing development in the future
- The South Prescot Action Area or part thereof should not be reallocated for residential uses
- Re: Bank Lane, Kirkby Green Belt site - If developed for housing it would create a contiguous urban link into Melling / Sefton and be an over development of this area of Kirkby

B5.15 Preferred Policy Option CS4: Economy and Employment

Table 12: Preferred Policy Option CS4: Economy and Employment	Total	%
--	--------------	----------

Supportive Comments	6	30%
Non Supportive Comments	6	30%
Other Comments	8	40%
Total Comments	20	100%

B5.16 General

- Policies in relation to maximising regeneration opportunities are supported. The reuse of vacant property and emphasis on brownfield sites within the document is of great value
- Support is given to the policy objectives, particularly the emphasis on enhancing the quality of existing employment areas
- Support is given to the general aims of CS4. In particular, support is given to the aims of meeting the employment needs of established and emerging market sectors, and encouraging mixed use employment/residential schemes
- Regarding the 'Town Centre' Employment Uses, whilst the sequential approach to site selection for retail, leisure and office development is in line with national guidance, the Core Strategy should acknowledge the need for some flexibility when assessing individual sites to establish the potential for ancillary uses to support or enable greater levels of employment development. The cross-subsidy generated by the inclusion of such uses can assist in the delivery of wider employment development. Whilst the justification text states that employment sites need to be safeguarded against residential development, mixed development of such land to include a range of alternative uses and ancillary facilities should be promoted as a means to enable wider employment development.
- Various aspects of national and regional planning policy allow for and promote the review of historic employment sites. This is firmly reinforced in the draft National Planning Policy Framework. This element of CS4 which seeks to protect all current or allocated employment sites from alternative types of development and land uses is inappropriate and too restrictive. It fails to recognise that there are many reasons why redevelopment of current, historic or allocated employment sites for alternative uses is appropriate and desirable - e.g. to secure regeneration and the effective recycling of previously developed urban land; to secure environmental and physical improvements; to assist in the delivery of new homes and reduce the need for release of Green Belt; to generate funds for the relocation of existing businesses; in recognition of the fact that many historic employment sites are not fit for purpose or do not meet the requirements of the market. It therefore represents an unreasonable burden and constraint to development
- A short-coming in the Joint Employment Land and Premises Study is that there is an inconsistency between the quality of employment land in Knowsley and the limited number of sites recommended for de-allocation. There could be a case for accepting that a greater number

of employment sites in Knowsley are unsuitable for modern business and that a more fundamental rationalisation is required

- CS4 is broadly compatible with the Waste DPD.

B5.17 Employment land needs and targets

- An independent market review of employment trends and the supply/demand position for employment land in Knowsley concludes:
 - That there will be a continuing trend towards a need for large, single user buildings in Merseyside, particularly for logistic purposes. The location of such buildings will be biased towards the M6, M62 and M57 corridors. The M57 corridor is particularly important given the direct link to the expanding Port of Liverpool and the investment potential that this brings
 - That the supply of suitable floorspace to meet projected demand is limited (unit of over 100,000 sq ft). The ready availability of suitable sites to meet demand is vitally important for occupiers and developers alike. There is predicted to be a shortfall of suitably located and readily available sites in Merseyside in general and in Knowsley in particular in the period to 2027.
- To meet the employment aims of the Council, it is important that the land needs of targeted employment sectors are met. Different sectors of the employment market have very different requirements in terms of accessibility and site characteristics. An undue emphasis on quantity of total provision is likely to lead to those various requirements not being met, with the consequent loss of potential employment opportunities to Knowsley. Large mixed use developments can play a major role in reducing the need to travel and are encouraged by national policy
- Policy CS4 states that the Council will identify 216.5ha of land for employment use between 2010 and 2027 and the use of the long term historic take-up rate as the basis for the projection of employment requirements over the plan period is supported. However, it is suggested that an element of 20% should be added to the historic take-up rate to allow for range and choice and the 'churn' factor. A further 20% should be added to allow the Council to plan proactively for uplift on historic take up rates. Therefore the Core Strategy should provide for an employment provision of at least 311.76ha. An additional element should also be included to allow for a full 15-year supply after the expected date of adoption. The only reason not to provide this amount would be if such land releases that would harm essential purposes of the Green Belt. This is because:
 - It is highly unlikely that all the employment land identified will be developed within the plan period for a mixture of deliverability reasons, including ownership, physical and marketing factors. Therefore, to provide a land supply equivalent to past take-up, would mean in practice that those take-up rates would not be achieved over the plan period
 - There is a need to provide developers and occupiers with a degree of range and choice and also to provide some ongoing supply at the end of the plan period.

- The RSS endorses the use of a flexibility factor of 20%. Equally, the Joint Employment Land and Premises Study produced by BE Group for the Council also proposes a 20% flexibility allowance, partly to reflect the CLG Employment Land Review guidance which "suggests a buffer is needed to allow for churn, and to allow for continuing range and choice."
- The basis on which the 20% flexibility factor has not been applied is flawed. There is no reason to dismiss a requirement just because it is "high" if it is properly justified and in accordance with guidance and best practice. Equally the Council's position ignores the fundamental purpose of the flexibility factor which is to ensure that development plans allow for the maintenance of at least past rates of economic development.
- The long-term rate used (12.73 ha per annum) is an average over some 13 years but is unduly influenced by Knowsley's poor performance since 2003/04. The Council fully accepts that this poor performance is mainly due to a lack of deliverable attractive sites. From this, it follows that if a good quality supply is now produced by the Core Strategy, long-term take-up rates can be increased significantly over the plan period. In addition, a policy to increase take-up rates would be consistent with PPS4, which urges the need to build prosperous communities by "improving" economic performance, and in particular to reduce the gap in economic performance rates. This focus on proactively planning for growth is reflected across a range of policies, including the draft NPPF, RSS, and the Government's pro-growth agenda.
- There is no document which seeks to assess whether the land supply - either existing or proposed - would be suitable for target sectors or facilitate their growth. If the Council had carried out this more detailed analysis, it would have shown that Knowsley's existing and proposed supply is deficient in sites appropriate for the following: Large logistics and distribution users; Advance manufacturing and knowledge-based industries, including research and development; and High amenity business parks.

B5.18 Distribution of employment land

- Sustainable location of employment opportunities is critically important. It should be ensured that these are only located where existing public transport and other sustainable modes are available, or failing this, where public transport and other sustainable modes can be easily introduced. In the latter instance the costs of new public transport and other sustainable transportation requirements will need to be borne as part of the overall development costs. The importance of sustainable access to employment via modes other than the car was reflected in Local Sustainable Transport Fund (LTSF) bid and is an integral part of the LTP so the Core Strategy needs to encompass this to control / direct the release or maintenance of employment land

- The identification of Knowsley Industrial Park, including Knowsley Business Park as a first priority for the development of employment uses is supported
- The preferred employment distribution is mismatched to housing, with both Kirkby at 51% and Prescot at 26.7% having additional employment land in excess of the housing allocation. In the case of Kirkby employment provision represents 51% of the Borough total whilst it only represents and receives 20% of the housing provision. Both Huyton at 10.6% and Halewood at 11.8% are under provided for in employment terms. No additional sites are identified in Halewood, above existing provision and the single allocation. When compared to housing provision, Halewood receives 15% of future housing. The combination of the existing and proposed provision will lead to a reduction in the opportunity for people to live and work in Halewood. The Council make no attempt to address the geographical imbalance of the existing employment provision; in fact it exacerbates the problem because it identifies the majority of new employment land in both Kirkby and Prescot. It is therefore questioned why the Council appears to have not taken the opportunity to review the existing allocations for these townships that have an oversupply of employment land relative to housing provision. Specifically, examination has been undertaken of the location of existing allocations, and whilst the majority are within existing employment areas and appear logical employment sites, they include nine greenfield sites of which five are located on the periphery of Knowsley Industrial Park. It is questioned why these sites have automatically been included in the supply figures, given the apparent over provision of employment land in the Kirkby township. Again this situation is further compounded with the new proposed allocations, when both Huyton (the largest township) and Halewood both have an apparent undersupply. The result of the Core Strategy as it currently stands would be increased commuting for Halewood residents who don't happen to work for Jaguar.
- The amount of employment land provided for at Halewood is clearly inadequate. The amount provided for at Halewood in total should be at least equivalent to what will be the proportion of the population resident at Halewood, whereas it will be a lot less, and this includes provision that is at best inflexible and may not be generally available. Achieving an amount at least equivalent to the distribution of housing would reflect the importance of Halewood as an employment area and lead to a more balanced supply across the Borough
- Jaguar Land Rover (Halewood) is identified as a priority for employment, but no further land is allocated for employment purposes at Halewood to supplement the existing allocation. This existing allocation (18.44 ha) at Eastern Compound is land owned by Tata held for Jaguar expansion and is consequently not available for other potential employers. This position effectively leaves Halewood with no additional or alternative employment provision at all. It is a missed opportunity to ignore the potential for employment growth in this accessible location, especially for manufacturing related business which could be attracted to premises in close proximity to the car plant.

- It is considered that Knowsley's employment land supply lacks sites within the key M62 corridor which is one of the prime locations for economic development in the North West Region. This corridor has experienced high levels of economic growth in recent years. In this regard, the success of the Huyton Business Park off Junction 6 shows the potential of sites which are highly accessible to the M62 motorway. Knowsley also lacks sites which have the potential to share in the future economic growth of the Liverpool John Lennon Airport. Sites off Junction 6 of the M62 motorway provide the opportunity to make up these deficiencies. Therefore the development land to the south-east of Junction 6 is promoted, including the former Cronton Colliery site for employment. This site is well placed to meet demand from many of the key target sectors, has immediate access off the M62 motorway; and, with the development of the land to the north of the motorway for residential, provides the opportunity for a major mixed development, offering sustainable transport links to the rest of Knowsley, including the major concentration of unemployment and deprivation in North Huyton. The site at Junction 6 should be released relatively early in the plan period because of the important contribution it can make to providing a balanced portfolio of employment opportunities, including for large distribution users.

B5.19 Employment and Green Belt / other employment sites

- The Council's approach is to identify locations for Green Belt land release which are considered to be the most suitable taking account of the five purposes for including land in the Green Belt: this approach is too narrow. It is an approach which is unlikely to lead to the most sustainable patterns of development. The advice in the Draft NPPF is that the review of Green Belt boundaries should be guided by the overriding need to promote sustainable patterns of development
- The review of Green Belt boundaries to meet long term development requirements needs to be based on a thorough understanding of how sustainable patterns of development will be served. From the perspective of employment land, sites need to be identified to best meet the needs of established and emerging market sectors. The identification of well located and available opportunities for employment uses is a key feature of sustainable development.
- First priority should normally be given to the development of land in the current urban area. However, the most important factor determining timing should be sustainability. In deciding the order of release, the most sustainable sites should be developed first. In certain circumstances this should be sites currently within the Green Belt. Given the scale of the employment and housing requirements of the Borough, some sites should be released from the Green Belt in the early part of the plan period. In this regard, there is a strong case that some of the larger sites currently within the Green Belt should be identified by the Core Strategy as strategic sites within the meaning of PPS12 because they are so central to achievement of its strategy. Other sites should be identified as broad locations for development.

- All of Site 8 and Site 9 should be included for release early in the plan period, should be shown as a strategic employment site. Development at the South of the area should be linked to that of the land of the north.
- At Kings Business Park, there are at least 8 vacant properties on this site and one building, as one enters the Business Park, formerly "The Malt College of Learning for Teachers" that has never been used. The waste of ground is unbelievable and is also poorly maintained
- The South Prescott Action Area or part thereof should not be reallocated for residential uses. There is nothing to gain by doing this, unless it can be demonstrated that Knowsley will meet its forecast housing targets but not its forecast employment land targets during the plan period. The site is highly unsuitable for housing, and evidence indicates it's suitability for employment development, including within the Joint Employment Land and Premises Study, and also when the site was sold in 2010, it was noted that "The sale (of the site) demonstrates there is still a healthy demand in the North West for good quality, well located employment sites of this scale that offer the potential for redevelopment". The Council's argument that there has been limited interest in redeveloping the land for employment uses is incorrect, particularly due to continued interest in the Tank House site. This site has also recently gained planning consent for use as a Hazardous Waste Facility which will be operational 24 hours a day, and could have impacts on residents sited near to the site, particularly when accounting for the need to segregate housing from heavy industrial uses. Furthermore, the selection of the Tank House site as a hazardous waste facility was decided based on seeking to avoid any detrimental impacts on residential areas which could arise from the industrial operations or from the 24hr operation of the site – its redevelopment for housing could impact upon the viability of the consented operation. It is however noted that bring the wider site up to a standard suitable for redevelopment on a par with the other available employment sites within Knowsley, could involve consider expenditure on site remediation and new infrastructure; which the developers of sites on the other industrial estates in the Borough have not had to take on. This factor is likely to have had an impact upon the level of interest in redeveloping the site for employment use.
- Land adjacent to the M57, when viewed alongside the remaining undeveloped land at Axis Business Park, will create a substantial and deliverable opportunity which is well positioned to attract occupiers (and employment) to the North West region. It is a location that has particular advantages over the other sites in the Green Belt identified in the Green Belt Study for release to meet long term development needs. These other sites are not nearly as well served by infrastructure and ownership constraints cast doubt over their deliverability.
- The statement that "Knowsley Safari Park should be permitted to continue to evolve and develop as a tourist attraction" is supported. The Safari Park sits within the Green Belt; this raises planning application issues in response to its evolution and development as a tourist attraction. The approach that "there is potential for a more detailed policy focus as part of a Site Allocations and Development

Policies DPD..." in respect of the Safari Park is supported. It is important that the Safari Park has the flexibility to evolve to meet changing tourism demands and there is value working with Knowsley Council to develop appropriate policies.

B5.20 Preferred Policy Option CS5: Green Belts

Table 13: Preferred Policy Option CS5: Green Belts	Total	%
Supportive Comments	7	12%
Non Supportive Comments	22	39%
Other Comments	28	49%
Total Comments	57	100%

B5.21 Principles / drivers of Green Belt review / release – Support

- The Government has acknowledged that for sustainable growth to be driven by private sector investment and enterprise, and the Council adopt the same ethos. The Council must address its growth needs as a whole, looking at the future needs of the Borough, as well as current needs. As the urban area is relatively constrained, sustainable development on land adjoining the urban area would help to address this issue and ensure a sufficient amount of land for housing in the future
- In the event of extensions of development taking place into the Green Belt, this should only occur where good public transport and access by other sustainable modes exists, or can be readily and easily achieved. If such extensions require new public transport or other sustainable mode infrastructure / services, the cost of these provisions should be met within the development costs / funding
- Strong support is given to the identification of some Green Belt land as reserved and safeguarded locations for future development.
- The proposal to release land from the Green Belt to meet employment and housing requirements is supported. There is no sensible alternative to Green Belt release if the identified requirements are to be met. However, the Council has underestimated land requirements and overestimated land supply. It is noted that the land identified by the Council for release from the Green Belt is in excess of the shortfalls which the Council has identified, providing some opportunity for an increase in housing and employment provision without further impact on the Green Belt.
- Welcome and support is given to the proposal to identify safeguarded land for development beyond the plan period. Such provision is required to comply with PPG2 which explains that any proposals affecting Green Belts should be related to a timescale which is longer than that normally adopted for other aspects of the plan, and that planning authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period. This will in some cases mean safeguarding land between the urban

area and the Green Belt which may be required to meet longer-term development needs.

- It is welcomed that Green Belt land around Cronton Village will continue to be safeguarded.

B5.22 Principles / drivers of Green Belt review / release - *Objection*

- Inside a Green Belt, approval should neither be given, except in very special circumstances, for the construction of new buildings, nor for purposes other than agriculture, sport, cemeteries, and institutions standing in extensive grounds, or other uses appropriate to a rural area. The development of the number of proposed dwellings within the Green Belt cannot be considered 'special circumstances' and for these reasons the plan is unacceptable.
- The proposals are heavily weighted to presume there is a need to utilise Green Belt land yet there is very little evidence given as to how the figure for the number of dwellings to be built on existing land has been arrived at.
- Disagreement is made with the approach of expansion into Green Belt areas, as this as a short sighted, easy solution instead of concentrating on the urban infrastructure and local sites available for development.
- Further encroachment on the Borough's Green Belt areas should be resisted wherever possible. There would be much more support offered to new developments using brownfield and former residential / industrial land.
- The Council should consider "brownfield" sites in preference to the use of existing "greenfield" land. Greenfield land should not be used for housing development, especially as it contains a substantial part of the local flood plain.
- The careful planning, redevelopment and regeneration of existing deprived areas or brown field sites can ensure that existing amenity is better utilised in these areas to create new, vibrant sustainable communities. More efficient use of these areas (as opposed to new green field development) ensures the continued protection of our greatest amenity, the Green Belt. Areas such as these must always be released for development in advance of Green Belt land coming forward.
- The original Everton academy planning application should be looked at in the context of safeguarding the existing Green Belt.
- In section 5.36 Option 5B considered meeting the need for development through a greater number of small scale Green Belt amendments. This option was dismissed as "insufficient appropriately sized and located areas for small scale detailed Green Belt amendment have been identified to meet the shortfall in development requirements". However the Council have failed to identify the type of sites that they considered or the methodology used to form this opinion.
- Green Belt policy is a remarkably powerful policy, in that it reverses the reasoning process followed in determining applications by placing the onus on applicants to demonstrate why an application should be allowed rather than the planning authority demonstrating why it should

be refused. A policy of such power should not be treated lightly and should not be used for anything other than that for which it is intended. Statements in the policy should only be applied according to what they say and not according to what the planning authority wishes.

B5.23 Impacts on neighbouring authorities / sub-region / infrastructure

- The Merseyside Green Belt Study (Final Report) published in January 2005, utilised the findings of urban capacity studies for Knowsley and Merseyside as a whole and concluded that there was no need to review the Green Belt boundary in Merseyside.
- Why has Green Belt land been identified as suitable for development without a full review of the Merseyside green belt boundaries?
- While the Preferred Options Report does not highlight any issues which would have a direct impact on Wirral, the potential release of land within the Merseyside Green Belt following an isolated partial review could however have a negative impact on the implementation of the wider strategy of urban regeneration across Merseyside as a whole which has, to date, been a key element of the agreed wider spatial strategy
- There is satisfaction that the Preferred Options Report does not expand any settlements in Knowsley into Green Belt on the Lancashire boundary.
- CS5 should consider the development requirements and potential need for Green Belt review around Widnes (in Halton), and in particular the potential for any such need to be met as a westward urban extension into Knowsley. It should be noted that this is not an option that has been formally considered / endorsed by Halton. This notwithstanding, it would be premature for Knowsley to preclude this option in the Core Strategy without proper consideration by the two authorities.
- Although the justification regarding CS5 refers to a shared approach with Sefton and to some extent West Lancashire, there is no reference to other neighbouring authorities which systematic of the purely 'locally arising needs' approach to the Green Belt Study.
- As identified in the Overview Study, there is some scope for Knowsley's housing needs to be accommodated within Liverpool, but this is not evaluated within the assessment of housing supply. Given too that Liverpool's own strategy is aimed at reducing net outflows of population and households to adjoining districts and elsewhere - within which net outflows to Knowsley have historically comprised the larger part - a closer evaluation of the impacts of changes to those flows is warranted before a commitment is made to Green Belt release.
- With respect to employment land in Knowsley, the Overview Study suggests that since the estimates of supply of and demand for this land should be treated with some caution and that the resulting figure for shortfall of land for employment on existing allocations in Knowsley might be an over-estimate.
- Potential scope for accommodating some of its land requirements in St. Helens - particularly in the longer term, when release of Green Belt land in Knowsley might be considered - is not explored in the Preferred Options document.

- It is recognised that decisions on the suitability and final identification of some major Green Belt sites may be deferred to the later Site Allocation stage in the LDF process. It would have to be demonstrated that any potential development impacts do not adversely impact upon the strategic road network. It is realised that the latter consideration has to be fairly balanced with the needs of urban regeneration. Potential developers would be required to assess traffic impacts via transport assessments including travel plan considerations. This is necessary in the interest of maintaining an efficient and safe strategic highway network.

B5.24 Distribution of development

- The Council's approach is too narrow and is unlikely to lead to the most sustainable patterns of development. The advice in the Draft NPPF is that the review of Green Belt boundaries should be guided by the overriding need to promote sustainable patterns of development. From the perspective of employment land it is particularly important to ensure that opportunities are identified which enable the promotion of sustainable economic development (in accord with CS2). This means selecting locations that reduce the need to travel and that do not require major investment in new infrastructure, and by recognising that the portfolio of available opportunities needs to support the development needs of established and emerging sectors (in accord with CS4). More priority should be given to land which is capable of development and well served by infrastructure rather than a reliance on historic allocations.
- The plan allows the Green Belt to determine the location of the development that will necessarily take place beyond the existing urban edge to far too great a degree. This is the wrong approach to making a spatial strategy which rather should establish the broad distribution of development first, and do so having regard to the location and role of the main centres, the economic potential of places, future population structure, the need for affordable housing, the relationship between jobs and homes, the availability of facilities and services, and movement patterns. The level and equity of accessibility in future should be key considerations. How the level of development, primarily housing and employment accommodation, is achieved and from which sources of supply should be the second step. Only when there is an overwhelming problem created by seeking to accommodate too much development in relation to a particular centre should a further iteration change the overall distribution. The Council has followed an approach which is driven by 'what can be built where and in what circumstances', and not sufficiently by 'how economic, social and environmental objectives will be achieved' or 'by the needs and problems of the communities'.
- The total amount of development that the Council has decided is needed for the District has been distributed it seems, according to the capacity within the urban area, followed by the use of the capacity available in the edge of settlement locations selected on the basis of the least harm to a very narrow and simplistic interpretation of their

importance to Green Belt purposes. Following a proper process, more development would be provided for at Halewood in the spatial strategy.

- The level of housing directed to Halewood reflects the agreed overall Borough provision and the current distribution of the population between the townships. The overall Borough provision should be at least what it is, and could be higher to reflect the appropriateness of provision at Halewood as noted, and the attractiveness of Halewood to the market, the growth agenda of the Draft NPPF, and the practicality of meeting the '5 year supply plus 20%' rule which is approaching.
- The amount of employment land provided for at Halewood is clearly inadequate. The amount provided for at Halewood in total should be at least equivalent to what will be the proportion of the population resident at Halewood, whereas it will be a lot less, and this includes provision that is at best inflexible and may not be generally available. Achieving an amount at least equivalent to the distribution of housing would reflect the importance of Halewood as an employment area and lead to a more balanced supply across the Borough.

B5.24 Housing land supply and urban area capacity

- The Council may have taken insufficient account of the potential housing supply that lies within existing urban areas and to a lesser degree within its own housing stock. Its proposals to release Green Belt land are based on an underestimate of the capacity that potentially lies on urban land. Knowsley's SHLAA is self-evidently a cautious assessment of urban land supply and is also a partial assessment as it does not factor in potential supply arising from: windfalls, urban greenspaces, other Council landholdings, changes in allocation, changes in densities of development and bringing empty homes back into use. Moreover, the supply that is identified in the SHLAA is subject to a 20% "risk assessment" discount to allow for non-implementation. There is little evidential justification for this discount and no evaluation of the factors presumed to underpin it.
- Due to Knowsley's constrained urban area, the identification of a sufficient long term housing land supply is not possible, and as a result, the Council's SHLAA identifies that the Borough suffers from a shortfall of 2,146 dwellings over this 15 year period. This figure differs from that which is quoted within the Draft Green Belt Study (a shortfall of 2,884 dwellings), which need to be accommodated outside of the urban area. The reports should be consistent and backed up by a robust evidence base.
- Support is given that planning applications for residential development within the reserved sites will only be granted when it is necessary to maintain a five year deliverable supply of housing sites in accordance with CS3. It is unlikely that the Council is able to demonstrate a deliverable five year housing land supply at present and that there is an urgent need to ensure that these reserved Green Belt sites are released from the Green Belt so that development on these sites can assist with the Strategic Objectives of the Core Strategy.

B5.25 Phasing of Green Belt release, tiers and trigger mechanisms

- The effectiveness of the release mechanism to determine the urban areas to be prioritised before the broad locations is undermined by the emphasis on maintaining a five-year supply for housing land. The Core Strategy acknowledges the flexibility offered by maintaining a five year supply to address emerging deficits in supply, which should such deficits occur, would put pressure on bring forward locations that were formerly in the Green Belt. Consequently, locations identified initially to meet the longer term development needs may be developed in advance of sites which would contribute to the urban regeneration focus of the Spatial Strategy and as a result the expense of the latter.
- Whilst CS5 highlights that the first priority for housing shall be the existing urban area and release of the broad locations must not undermine the urban regeneration objectives, this is offset by permitting locations proposed for housing to be granted to maintain a five year deliverable supply. In effect, the trigger mechanism is likely by default become the need for maintenance of a five year housing supply. The application of the trigger mechanism to determine the spatial pattern of development strictly only applies to the phasing of the development of the three categories of broad locations, sequenced as firstly Reserved Tier 1 locations, followed by Reserved Tier 2 locations, and post 2027 Safeguarded locations. Whereas, the relationship between the urban areas and Green Belt vis-à-vis housing development is managed only in general terms by the overall spatial development strategy and a phasing approach which seeks to 'ensure a five year supply to support the efficient use of available land and protection of urban regeneration priorities'. As regards the phasing approach, the concern is that achieving urban regeneration priorities is undermined by the need to ensure a five year supply.
- It is agreed that first priority should normally be given to the development of land in the current urban area. However, the most important factor determining timing should be sustainability. In deciding the order of release, the most sustainable sites should be developed first. In certain circumstances this should be sites currently within the Green Belt. It is considered that given the scale of the employment and housing requirements of the Borough, some sites should be released from the Green Belt in the early part of the plan period. In this regard, there is a strong case that some of the larger sites currently within the Green Belt should be identified by the Core Strategy as strategic sites within the meaning of PPS12 because they are so central to achievement of its strategy. Other sites should be identified as broad locations for development.
- The Preferred Options Report explains that "for reasons of scale and flexibility" the smaller sites have been placed in Tier 1 for the purposes of phasing. This is the wrong way in which to accord priority to release. The main factors should be the relative sustainability of the various sites, including the likely contribution to the planning objectives for the area and the impact upon the Green Belt. Larger sites are more likely to be sustainable and make a greater contribution to planning objectives than smaller sites because of their ability to incorporate sustainable features such as public transport and carbon reduction

measures, and to provide social and community infrastructure. Furthermore, larger sites are likely to have much longer lead-in times and be developed over a much longer time-period.

- CS5 suggests that further small alterations to the Green Belt boundaries will be identified in the Site Allocations and Development Policies DPD along with the strategic sites identified in table 5.4. Support is given to this as there are a number of other sites where smaller alterations are required to create more robust, longer term boundaries.
- There is some ambiguity over the status of a “reserved location”. Would the policy remove the location from the Green Belt on adoption of the core strategy, or when the location meets the criteria for development (i.e. at some point after the adoption of the core strategy)? If it is the former, then should the locations actually be identified and allocated by the core strategy as strategic sites (it is argued that they are critical to the delivery of the strategy)? Similarly the core strategy refers to the reserved and safeguarded areas as broad locations. However, the supporting Green Belt study identifies specific sites.
- It is considered that the clause which suggests that planning permission should only be granted for the development of reserve locations, where it is necessary to maintain a five year supply, is not appropriate. Objection is made to this. There is a clear and distinct need for housing now: it can never be accurately determined when or if development is to come forward on a site once planning permission has been granted. In the case of outline planning permissions, it can potentially take three to four years, and in some instances, even longer.
- The assessment criteria used to establish phasing is too arbitrary, simplistic and ultimately flawed. Just because a site is comparatively smaller than another does not, in any way mean that it should have an automatic advantage over another, or necessarily that it will be easier or more flexible to develop than another. Each site is different with its own unique opportunities and constraints. Whether a site is small or large is largely inconsequential; what should matter more are the site’s comparative suitability, availability and developability in PPS3 terms. Therefore it is recommended that decisions taken regarding tiering and the phased release of sites for residential development should be based on such PPS3 criteria. The Green Belt Study should be revised to reflect this.
- There is concern that the new Green Belt boundaries will only be defined in the Site Allocations and Development Policies DPD. The adoption of these documents is likely to be some time after the adoption of the Core Strategy and this may lead to a delay in the delivery of housing within the Borough. There should be a clear trigger release within the Core Strategy, which will allow the release of these sites where a five year housing land supply cannot be demonstrated.
- The draft NPPF reiterates the notion of ‘safeguarded land’ and presents the policy instruction that in making changes to the Green Belt in its local plan, a planning authority should ensure that changes will not need to be made at the end of the plan period. The Council will have to address this issue, taking land out of the Green Belt that does

not need to be kept permanently open and as the development requirements likely beyond the end of the current plan period provide the exceptional circumstances.

- Support is given to the need to urgently review the Green Belt in Knowsley, as well as the general distribution of reserve locations identified. However, the phasing of Tier 1 and Tier 2 sites is not sufficiently explained or justified. A more flexible and responsive approach is desirable which would allow sustainable sites to come forward which do not undermine the Spatial Vision or the Strategic Objectives.
- Objection is made to one of Green Belt locations in Halewood being categorised as a Tier Two location. CS5 states that these Tier Two locations will only be released when Tier One locations are not available. It is understood that the only reason the Tier One sites have been categorised as such, is because they are smaller and potentially will require less infrastructure works. However at this stage it is difficult to make such an assessment based purely on the indicative capacity of the sites. Some of the Tier One sites may well require major infrastructure works and therefore the reserved housing sites should not be categorised as Tier One or Tier Two as there is a real possibility that in prioritising one site or set of sites over the others the potential early deliverability of a large site could be missed. Therefore objection is made to the categorisation of sites and suggests that priority is not given to any particular housing sites. Any of the reserved locations identified should be able to be released for development when a five year housing land supply cannot be demonstrated.
- A flexible approach to land release must be taken to allow both Tier 1 and 2 sites to come forward in response to market conditions; something which is supported within the draft NPPF. Although CS5 states that permission will only be granted on these locations when it is necessary to maintain a five-year 'deliverable' supply of housing sites in accordance with Preferred Option CS3, the Council should ensure that this is in fact a flexible approach. This will enable to the Council to meet the identified housing demands of the Borough.
- Objection is made to one of the sites near Halewood being categorised as a Tier Two location. Preferred Option CS5 states that these Tier Two locations will only be released when Tier One locations are not available. Reserved housing sites should not be categorised as Tier One or Tier Two as there is a real possibility that in prioritising one site or set of sites over the others the potential early deliverability of a large site could be missed. Reserved locations identified should be able to be released for development when a five year housing land supply cannot be demonstrated.
- The assessment criteria used to establish phasing is too arbitrary, simplistic and ultimately flawed. All land to the South of Whiston should be entirely reclassified as a Tier 1 reserved location for residential development, i.e. first phase release.

B5.26 Impacts on urban regeneration

- Knowsley would be facilitating and kick starting such regeneration by identifying some early releases of Green Belt land.
- The need to encourage urban renewal in Kirkby and other parts of the district is understood, but there needs to be a parallel, although smaller scale, promotion of other sites, such as Bank Lane, Kirkby, which can bring forward the type of balanced housing market which the Spatial Vision sets out. As the Core Strategy presently stands, there is a danger that highly sustainable and well located sites will be deferred and delayed by the phasing mechanism. If the desired balanced housing market is to be achieved, it will be necessary to bring forward some of the Reserved Tier One locations as soon as possible, both to deliver the desired mix of housing and to raise the profile of Knowsley as a desirable destination for existing and new households.
- The phasing indicated, including an immediate policy presumption for the release of "reserve" locations in circumstances where a five year supply of deliverable sites cannot be demonstrated, will almost inevitably lead to pressure for the early release of Green Belt sites. National planning policy (PPS3 and NPPF) does provide a presumption in favour of housing proposals where a five year supply of deliverable sites does not exist. However, this presumption is caveated – the release of land must also accord with the spatial strategy and should not undermine wider policy objectives e.g. urban regeneration. This is a worrying prospect as it will impact on the ability of landowners to promote the redevelopment of previously developed sites in South Prescott. In respect of Prescott it is vital that priority is given to the use of Green Belt as a strategic policy tool, in order to promote and encourage urban regeneration.
- It is considered that that Knowsley's proposed commitment to a degree of Green Belt release may be premature. Before endorsement could be given an approach which plans for Green Belt release for employment, and especially for housing use, during the latter years of the Knowsley Core Strategy period it would need to be demonstrated that all efforts to achieve the development of land within existing urban areas have been made, and that Green Belt release is genuinely a last resort, thereby representing the exceptional circumstances required for Green Belt release under national planning guidance. This to be particularly important given the close functional and physical linkages between Liverpool City Council and Knowsley areas, as is well demonstrated by travel to work patterns and recent flows of households, and the important role the Merseyside Green Belt plays in supporting the wider sub-regional strategy of directing investment and development to the conurbation's inner areas, where there is a substantial resource of vacant brownfield land and buildings and where the essential infrastructure in support of development is already in place.

B5.27 Impacts on the green and rural environment and flood risk

- A number of locations which are highlighted for Green Belt release pre 2027, and post 2027, contain sites and areas which are currently important for biodiversity and the environment, as well areas that have the potential to enhance and reconnect biodiversity in the future. Some

of these locations also have the potential for increasing community access to green spaces. This seems to be at odds with other priorities and preferred options set out within the report. For example, the planned release of Green Belt south of the M62 around Cronton Colliery, post 2027, seems to contradict with enhancing the public realm and green infrastructure between Whiston and Cronton. However, these two priorities can be taken forward together with good planning and design. Therefore it is expected that the current biodiversity assets, the biodiversity potential and the potential green infrastructure improvements, are taken into account when all Green Belt release sites are being allocated.

- The global commodity markets have seen massive inflation in recent months, and to take more farming land can only cause problems in the future. This approach (to Green Belt release) is short-sighted and lacks common sense. A stringent policy avoiding any development on Green Belt land should be followed especially when the land is in farming use.
- There is little enough farm land left without the Council pandering to developers and allowing the building on Green Belt which forms a welcome breathing space for Knowsley residents and should be protected.
- How does Knowsley's LDF fit in with the work being undertaken by Transition Liverpool, and their 'Feed Liverpool' campaign? One of their aims is to raise awareness about issues like the need to keep farm land as farm land, as well as serve as a way of connecting people up who are interested in supporting existing urban farming initiatives and developing new ones.
- Building on Green Belt will not tackle climate change and will have the opposite effect. This is not considered in sufficient detail.
- Objection is given to the methodology used to assess Green Belt parcels in relation to the potential for flood risk. Land within Flood Zone 2 is being identified for development over many more sites within Flood Zone 1, and there is no evidence of a sequential approach (required by PPS25) having been taken. It is noted that the development capacity of the identified 'reserve' and 'safeguarded' sites is based on the total area of the site outside of Zone 3. What has not been considered is whether the resulting pattern of development created should only include the area within Flood Zone 1 and 2 being developed and whether or not this would create a robust, long-term Green Belt boundary or whether the proposed development is likely to increase the likelihood of flooding elsewhere. Due to the proximity of the development area to Flood Zone 3, and given the sites are all previously undeveloped, this will have an impact on the capacity of the site to absorb water and lead to greater volume of surface run-off and potentially exacerbate flooding on site or in the vicinity. It is also important to note that the Draft Knowsley and Sefton Green Belt Study a Strategic Flood Risk Assessment (SFRA) (level 2) had not yet been undertaken and none of the individual sites have been tested. Therefore, it is considered that the identified 'reserve' and 'safeguarded' sites within Flood Zones 2 and 3 should be withdrawn from the sites proposed to be removed from the Green Belt under

Preferred Core Strategy CS5 due to the flawed assessment methodology used within the Draft Knowsley and Sefton Green Belt Study.

B5.28 Impacts on recreation and sports facilities

- By virtue of its location adjoining urban areas and comprising of essentially open land, the Green Belt makes an ideal location for outdoor sports facilities and can accommodate a wide range of sports close to major centres of population. PPG2 recognises outdoor sport as an appropriate land use in the Green Belt. Therefore it is recommended that criteria to release land from the Green Belt should take account of current and potential use for sport and recreation. Whilst it is understood that the Core Strategy would only remove the Green Belt designation of the identified locations, the text makes clear that the locations are suitable for, and indeed required for, development when specified circumstances exist.
- It is recommended that the text of the Core Strategy makes clear that in terms of sporting uses, prior to any future development the sites will need to be demonstrated as being surplus to requirement or that equivalent replacement facilities would be needed. In the absence of evidence that the locations are surplus to need, then there has to be a question over the ability of the Core Strategy to deliver, as whilst there might be enough land for employment and housing through Green Belt release, the development of such sites might require equivalent areas of land to be identified for replacement sports facilities.

B5.29 Table 5.4 – broad locations

- *A very substantial number of comments were received which related directly to this table, which identified the “reserved” and “safeguarded” locations within the Green Belt required to meet development needs. In addition, respondents suggested alternative sites which could be used to meet these needs – these are listed below. Further detailed comments on the Green Belt Study are given in Section C of this report.*
- CS5 states that any development within one of the locations identified within Table 5.4, must be sustainable and be carried out in accordance with agreed master plans, development briefs and other development assessment tools as required to accord with CS2. However, further detail is not given as to the timescale involved in creating such documents, or who they will be created by. Such tools should be more flexible in nature to ensure that any development provides housing required by the local area, whilst remaining feasible and viable.
- Objection is made to any housing being built on Whiston or Prescott's Green Belt land and the scaling back of Green Belt land in the same areas. Some areas identified are areas such as Whitakers in Prescott and the area surrounding Lickers Lane in Whiston. Building on this land will infuriate residents in the area and more importantly will impact on the area's beautiful appearance.
- Some of the sites identified for removal from the Green Belt are in current use (or were last used for) sport. For example, reserved

locations 3 and 5 appear to include playing fields. Objection would be made to proposals to develop such sites unless they had been demonstrated as being surplus to provision (taking into account current and future need), or genuine replacement facilities of equivalent quantity and quality are provided in a suitable location.

- It is wrong that a developer should be able to buy the land at Green Belt prices and then hold on to it in the hope of making a profit from change of designation. This form of speculation may be common, but it should be discouraged. There are many potential uses of the land which are consistent with Green Belt status, and the Council should make it clear that they have no intention of changing it.
- The identification of locations is almost incomprehensible, (e.g., “Land to the South of Whiston for Housing”) and meaningless.

B5.30 Location 1: Land at Bank Lane, to the north west of Kirkby: *Support*

- Knowsley would be facilitating and kick starting such regeneration by identifying some early releases and would, therefore, suggest that the Preferred Options should recommend the site at Bank Lane be released for immediate development. Furthermore, given the location of the Bank Lane site and its present derelict condition, it makes sense to bring this site forward for development as soon as possible.
- The proposed housing development site at Bank Lane, Kirkby, would have only a very limited impact on Sefton residents.
- The identification of parcel land at Bank Lane, Kirkby as a location reserved for urban extension is welcomed. This site is, however, developable well in advance of the pre 2027 timescales suggested.
- Bringing forward this site for immediate development, to complement the regeneration of the adjacent Tower Hill area, will deliver the desired mix of housing in a highly prominent "Gateway" location into Knowsley. Such a development would not prejudice the urban regeneration needed in other parts of the district. Moreover, higher quality residential development at Bank Lane would help stimulate other regeneration opportunities throughout the Borough by attracting specialist national residential developers to Knowsley. The Core Strategy should be amended to allow a trigger mechanism to support the site's release for immediate development in advance of the adoption of the Allocations DPD.

B5.31 Location 1: Land at Bank Lane, to the north west of Kirkby: *Objection*

- What is attractive about the residential area near this site is the nearby Green Belt. There are few open field spaces as it is and it would be beneficial to see the space developed into a park area, or woodland area, which is something the area does not have.
- The development of this site would devalue neighbouring properties. There seems to be a lot of houses 'to let' and 'up for sale' so it is not very convincing that there is a demand in the area for additional new housing.
- Given the scale of house building in Kirkby during the past 20 years, a proposal to develop land at Bank Lane does not fall into the category as being exceptional circumstances as required by PPG2.

- The land has open views of the countryside with no means of access from Bank Lane and provides a break from the unrestricted built up areas at Tower Hill and Shevington Lane. The development would merge Kirkby with Sefton and therefore would be contrary to the principles of PPG2.

B5.32 Location 2: Land to the east of Knowsley Industrial Park: *Support*

- The land is at an adequate distance from Knowsley Park so that its development will not impact on the historic setting of the Park
- Part of the land is in agricultural production, but it is farmed on a contract farming basis as a small part of a larger business. The removal of the land from that business will have no significant effect on the viability of the business.

B5.33 Location 2: Land to the east of Knowsley Industrial Park: *Objection*

- This description is confusing as it isn't clear where the land is situated - Kirkby or Knowsley Village. If it is the latter the land is Green Belt near to a Conservation Area. This must overcome the policies in PPG2 and the process of the Examination in Public.
- Further release of Green Belt land for industrial uses around Knowsley Village will erode the character of the area.

B5.34 Location 3: Land at Knowsley Lane, to the north of Huyton: *Support*

- Strong support is given to the allocation of this land within the Reserved Tier 1 Locations.
- The site is bounded on the north by the motorway and this very effectively eliminates any impact on Knowsley Park that the development of the site might have.
- The land has for many years been used almost entirely for equine use and therefore the development of the land will have minimal effect on food production. A survey of land quality will be undertaken and provided to the Council.

B5.35 Location 3: Land at Knowsley Lane, to the north of Huyton: *Objection*

- Land on Knowsley Lane should remain as green fields and farm land to retain a rural feel in the area. Opposition is given to the Council's proposal to consider this site for future development and it should be removed as a "Tier 1" location. There are clear reasons for this:
 - A single family have lived at Knowsley Lane farm for over 120 years with each generation of the family continuing to farm the land. The family intention is to continue farming the area for many generations to come and there is extreme concern about the proposal to release the land for future housing or employment development.
 - The farm currently provides an open vista for the occupants of houses along Knowsley Lane and ensures a feeling of rural openness as well as a link to the historic nature of Knowsley Village. The replacement of this with new housing development will impact hugely on the semi-rural feel of the surrounding area and will generate further urban sprawl.

- The Council already recognises that the local area requires “more retail, community and leisure facilities”. The provision of new housing in this location will exacerbate this problem by removing community and leisure services (i.e. the existing stables) but also by putting more strain on the remaining local amenity with the influx of a large number of additional residents.
- Loss of farming is a huge problem for the UK. The loss of further farmland must be a very last resort and other areas in the Borough must be re-considered.
- The farm currently provides a natural buffer between the motorway and the residential area. Provision of new houses adjacent to the motorway would create a poor natural environment for occupiers of new dwellings. The Council have a duty of care to their residents and should therefore retain this natural buffer rather than build new family homes in an area where there are known amenity / pollution problems.
- There are questions and queries about how the location has been dealt with within the Green Belt Study methodology, including that the site helps to a) preserve the setting and special character of a historic area; b) provide opportunities for outdoor sport and recreation; c) provide countryside uses that should be protected. In addition, some of its “severely restrictive constraints” were not adequately recognised. There are also questions around the methodology for grouping together sites.
- There are questions about the extent to which the Council has given enough consideration to the actual real life benefits that Knowsley Lane Farm offers to the community.
- An alternative way of releasing some land for development whilst at the same time protecting the benefits of the Green Belt would be to divide Knowsley Lane Farm itself up into smaller parcels. If this methodology was adopted the farm and its immediate surrounding area would be retained and a small area of land adjacent to the motorway junction could then be allocated for future housing / employment use. In these circumstances the farm would continue to operate and some land would potentially be available for future development. Although this would not create a more logical boundary, it would enable some land to be released in order to meet the Council’s objectives whilst still retaining an important area of open amenity land and thus maintaining the integrity of the Green Belt.

B5.36 Location 4: Land at Edenhurst Avenue, to the west of Huyton: *Support*

- The site exhibits development potential and would make a suitable and sustainable site for future housing land which could contribute to the portfolio of housing land required to fulfil annual housing land requirements

B5.37 Location 4: Land at Edenhurst Avenue, to the west of Huyton: *Objection*

- The Green Belt study states the limited capacity for housing would ‘make little impact on efforts... to re-balance the housing market’ and

'have a negative influence on the financial viability of affordable housing'.

- When the field was owned by Lucas's it was a well used playing field/sports facility. This area has seen the gradual erosion of playing fields. Lucas's playing fields are gone; the land where Plessey's used to be is now being developed for housing purposes. The Council cannot keep developing into every available space within this part of Knowsley, e.g. disused leisure centre and school sites
- The land was purchased several years ago by speculative investor, for a relatively minimal amount due to its Green Belt Status. It has been deliberately neglected, allowed to deteriorate and give access to unsociable behaviour, and opening up this parcel of land for private housing (or other purpose) would generate minimal income for the Council, but would give huge profit to the private land-owner, who has not maintained the land in any form since purchase.
- Overriding Green Belt governance would then allow the owner of the land to significantly profit from its onward sale to a developer for the sake of 90 dwellings. This circumvents the protection supposedly offered by Green Belt status, and also erodes its central purpose of separation by green field and completely dismisses any consideration for the land's alternative use that would actually benefit the Bowring Park community as a whole.
- In the recent past plans were submitted to Knowsley Council to develop this site. The area surrounding Bowring Park Avenue was canvassed and the overwhelming opinion was against these plans. At this time residents were encouraged that the Council was against the development, there was sufficient land within Knowsley for future developments, and as the area was Green Belt, the Council would not pass the plans. Most residents in the area have not changed their views and hence there is a failure to see why Knowsley Council has changed its stance in such a short space of time. In addition, since the amount of housing to be planned for has fallen from 10,000 to 7000, so there should be plenty of space without building on the Green Belt in this location.
- Massive increase in residential density opposite Edenhurst Avenue is unacceptable overdevelopment of this area. Even 90 units will be a huge detrimental impact on the local environment. "Brownsite" development of Wilson Road should be used.
- More than half of this location is within Flood Zone 3 and 2. This leaves the north-eastern portion of the site as the developable area. The resulting development boundary would not create a long term defensible Green Belt boundary. The development of this site would not be able to extend the whole length of the eastern side in order to fully contain the site, and there is no existing containment feature to visually contain or terminate the site.
- Objection is made to the review of Green Belt boundary in this location for the following additional reasons:
 - The site is already prone to flooding and further building structures would cause further problems for local residents.

- Insurance costs are already increasing as the area is viewed as a higher risk area.
- Existing access creates a natural boundary that serves to reinforce one of the key things all residents have in common and that is that houses were bought in Bowring Park, not Belle Vale.
- There is no suitable or safe access to this parcel of land. Developers would either have to (a) access the area via Rimmer Avenue/Bowring Park Avenue or (b) bring in access from the other side of the field which falls within the remit of Liverpool City Council. (a) Would prove very problematic to local residents and (b) would be an issue because it would open the area up to being a rat run for people to access the motorway network through the roads leading off Edenhurst Avenue.
- It would lead to an increase in local anti social behaviour. Opening up access to this area would only exacerbate this ongoing problem, and lower the quality of social life for the local community.
- There are no school, medical or sports facilities provided by Knowsley Borough Council within the vicinity. Additional dwellings will surely place only further strain on existing services that are at near full capacity.
- Current open space / rural feel will be lost, leading to a massive reduction in quality of life
- The land has a wealth of beautiful trees many with preservation orders; it would be devastating to lose what has become an area of natural beauty.
- There is now a wide range of flora, fauna and wildlife, on the field. In a survey carried out over the last two years, it was found that 32 different species of birds visited the ground and surrounding gardens, including 15 less common and 4 scarcer species.
- It would lead to visual pollution of the current landscape as well as noise pollution due to huge increase in traffic and people.
- It would create air pollution due to additional traffic to new houses and lorries for building work.
- The housing would probably not be in keeping with the houses within the Edenhurst Avenue area.
- If this development is at the planning stage and is likely to be approved then the following concerns are appropriate:
 - Any development abutting Edenhurst Avenue should be no more than ground floor and one floor high.
 - The current trees along Edenhurst Avenue which currently do not have a preservation order are given one and are maintained with high density planting of bushes all maintained by the Council as a minimum 5m buffer zone before residential development starts.
 - Access to the site should be by lorries and residents should be on the opposite side of the field to Edenhurst Avenue to reduce congestion / pollution.

- Measures should be put in place to prevent traffic coming from the motorway or Bowring Park Road to use the new development as a cut through to Childwall Valley Road.
- Lastly this site is inappropriate for development due to mines that criss-cross the surrounding fields and brown site development would be far preferable if additional housing stock is needed.
- Social housing should not abut Edenhurst Avenue.
- There is an awareness that all the proposed building is in the planning and process stage, however there is an expectation that further plans and actual numbers for the houses to be built and where the roads and access points would be for any road traffic, would be made available to local residents.
- The current situation offers a unique opportunity to positively enhance the Bowring Park and surrounding areas and develop the land in such a way that either enhances the emerging eco system developing there as a result of the land being left to fallow or in some form that incorporates this 'wild' feature to compliment the National Wildflower Centre at Court Hey and other recreational activities.

B5.38 Location 5: Land bound by the A58, north of Prescott: *Support*

- No comments received.

B5.39 Location 5: Land bound by the A58, north of Prescott: *Objection*

- The development of this location for housing is a non-starter, as it incorporates Whitakers Nursery and the land up to the M57. The vista into Prescott from Liverpool along Liverpool Road and junction with Knowsley Lane, provides a wonderful green landscape of the western slopes of the township of Prescott, possibly little altered over the past centuries, especially where it is contiguous to Knowsley Park. Housing here would be a monstrosity, let alone viable roads on Liverpool Road.
- Opposition is made to the utilisation of land bounded by the A58 to the north of Prescott for housing (Whittaker's Nursery Site). This should be removed from Tier 1.
- Is this area for building, or to make a road off Prescott bypass, as was discussed in 1985/86?

B5.40 Location 6: Land at Carr Lane, to the west of Prescott: *Support*

- Support is given for the inclusion of the site as the location to be released from the Green Belt to serve future development needs. However, there is a compelling case for either housing or employment in this location, which should be led by a comprehensive master planning process for the wider South Prescott area. The site should be fully considered as part of evolving master plan ideas. The site should be viewed as a priority opportunity for redevelopment in the context of CS13 and, as such, should be viewed as a Tier 1 Location.

B5.41 Location 6: Land at Carr Lane, to the west of Prescott: *Objection*

- There are premises there that have not been occupied; also 65 acres are for sale. Being a household landfill, this will make an ideal forest area.
- The proposed development of this location for employment uses is incomprehensible. Does this mean that parts of Huyton Golf Club and the Prescot Recreation Sports Field are included or just the remaining factory buildings of the former BICC site? As Green Belt it should remain so without patchwork indiscriminate placements of houses and factories
- Opposition is made to the development of the former BICC site as it is designated as a site for hazardous waste, with a part designated for housing.

B5.42 Location 7: Land at Finch Lane / Higher Road, to the east of Halewood:

Support

- Support is given to the identification of locations to the east of Halewood for removal from the Green Belt and eventual development.
- Strong support is given to the importance of reviewing the existing Green Belt boundary in order to meet longer term development needs for housing development at two locations to the east of Halewood. The sustainability credentials of this area would ensure that the aims and objectives of both National and Local policy are upheld whilst providing sustainable growth.

B5.43 Location 7: Land at Finch Lane / Higher Road, to the east of Halewood:

Objection

- These areas are designated as Green Belt in the most recent Unitary Development Plan, and it was stated that this would not be changed.
- A main concern is the threat of the removal of the existing Green Belt boundary currently based on Baileys Lane, including concerns about how the Council has dealt with issues of containment and combination of different Green Belt sites.
 - The northern parcel of land at Greensbridge Lane is separated from the Baileys Lane / Lower Road parcel by a 40ft+ railway embankment. Any new Green Belt boundary for the two 'combined' parcels would have to have an artificial boundary feature added on the Greensbridge site to provide a solid 'clearly defined' Green Belt boundary that the council could then defend from future development. With the rail embankment physically separating the two areas and no clear view of both together the need for combining them seems very weak.
 - With regards to moving the Green Belt boundary from Baileys Lane, the reasoning is flawed. Presently behind Baileys Lane there are trees and farmland running all the way across to Lower Road and Finch Lane. The only structures behind the houses and buildings on Baileys Lane are the RSPCA site situated remotely at the top end of Finch Lane / Higher Road. Hence, the site is an unspoilt piece of undeveloped Green Belt land used for agriculture. The excuse of using Finch Lane as a new, clearly defined boundary lacks substance and it would be difficult to

determine where the Green Belt starts and finishes under the proposed change. The new proposed boundary would put other parcels of land under pressure; the caravan park on Lower Road would be an example. Small parcels of land between Finch Lane / Lower Road and isolated settlements like the caravan park would subsequently be picked off in future reviews.

- Objection is made to this proposal for the following reasons:
 - Plans fail to take account of the potential for flooding in the area; why has no mention been made about the risk of flooding in this area and the fact that the flood plain is the reason part of the former Bridgefield Forum site remains undeveloped?
 - There are major concerns regarding infrastructure needed to service such an increase in the number of dwellings in the area; and they fail to offer any alternative options.
 - The local infrastructure – schools, transport links, public amenities and services and shops – would not be able to cater for this level of increased demand. The Council has no control over bus services which are already poor from Halewood to key destinations such as Whiston Hospital, this would only make matters worse.
- The proposals make provision for an additional 1440 dwellings in the east Halewood area, despite the fact that in the Council's own housing survey Halewood is ranked 5th out of 6 areas in Knowsley where people would want to buy property and it is stated that 100% of double income households would not be able to afford to purchase property based on current prices.
- It is understood that there is a need to make land available for houses, but the following questions are relevant:
 - Why take land that extends the urban area? Why not take land closer to the present housing area, e.g. land off Lydiate Lane, which is not used for food production.
 - The area is used for food production - surely land should not be taken away from this, because of the present world food shortage?
 - The Rural Payments Fee that is paid to farmers for looking after the land is being reassessed - surely proposals will affect this for those farmers who now own the proposed areas?
 - When the A5300 Knowsley Expressway was built, KMBC made the statement that the edge of the Green Belt would not be moved towards it - surely that is what you are proposing, and you should consider areas closer to the present urban area
 - Many people have moved to live in Halewood, as it is the edge of housing – the Council is now proposing to renege on its promise to those people, as per the UDP.

B5.44 Location 8: Land to the south of Whiston (Phase 1, Windy Arbour Road and Phase 2, Lickers Lane): Support

- All of Site 8 and Site 9 should be included for release early in the plan period.

- Land to the south of Whiston (in association with land surrounding it) can play a major and positive role in delivering the aims of the Core Strategy. The location and natural canvas surrounding the land (and certain woodland and wet features to be retained within it) create an exceptionally attractive setting for a new housing development. The capacity of the land for residential development will make a significant contribution to meeting the housing target. This will also help to retain and attract new investment, sustaining local employment and bringing new jobs to the area. However, the assessment criteria used to establish phasing is too arbitrary, simplistic and ultimately flawed. All land to the South of Whiston should be entirely reclassified as a Tier 1 reserved location for residential development, i.e. first phase release. The primary reasons being:
 - The suitability of the land, including its proximity to the main urban area and a wide range of key facilities.
 - The existence of main suburban access roads means the site's development can be easily accessed and phased.
 - Fox's Bank Lane and the M62 allow a logical extension to and containment of the urban area, and will leave a very strong defensible boundary
 - There are no significant constraints to development in relation to flood risk, nature conservation, or conservation.
 - Part of the land is immediately available for development, provided this is on appropriate commercial terms. In addition, it is understood that surrounding third party owners are equally prepared to allow their land to be developed.
 - There are no physical or legal (covenanted) restrictions to development.
 - The land will be extremely attractive to residential developers seeking prime residential locations within the borough.

B5.45 Location 8: Land to the south of Whiston (Phase 1, Windy Arbour Road and Phase 2, Lickers Lane): *Objection*

- Why has Whiston got the largest proposed expansion into Green Belt land for the development of housing and then after 2027 bigger commercial area developments, when the areas of the old Pirelli and cables factory in Prescott have not been fully developed yet. Expansion is not the answer if you have not managed to fulfil the initial targets of developments in the current areas.
- Over the years a large proportion of Green Belt in this area has been lost. In the 1970s and 1980s all the farm land between Lickers Lane and the Liverpool-Manchester railway line was developed for a council housing estate including a church, schools, public houses, community centre, shops and private housing. Significant Green Belt was also lost to the M62, M57, Knowsley Expressway, Tarbock Interchange, The Villages Hotel and Leisure complex and Fallows Way industrial estate. Previous plans for this location were rejected, supported by resident opposition, and Knowsley MBC informed the residents that the land would remain part of the Green Belt. The Local Development Framework would now indicate that, despite past assurances from

Knowsley MBC, all of the remaining Green Belt in South Whiston, which is of the highest classification of agricultural land, is now to be considered for future development.

- Objection is made to the proposal for Whiston for the following reasons:
 - The quality of space within Knowsley will be reduced as building houses on Green Belt will lose the country feel of the area. Whiston is all ready over built on
 - Whiston's Green Belt is a small but significant breathing space within Whiston's already cramped and congested township. These areas can provide valuable open space on the urban fringe with associated benefits including recreation, human health / enjoyment and biodiversity conservation.
 - This breathing space provides residents with an opportunity to benefit from the last remaining area of Green Belt; family excursions, dog walkers, photographers, bird watchers and wildlife enthusiasts all utilise this Green Belt and gain invaluable pleasure from its aesthetical and ecological value
 - Whiston's commercial, educational and medical amenities have not the capacity to withstand more pressure from an increasing town population.
 - The development of a further 1450 dwellings would severely impact on overstretched Primary Education facilities which have been cut drastically in recent years together with cuts in youth services.
 - Residents who are registered with the local GP's surgeries have to wait up to two weeks sometimes longer to get an appointment at the moment, so an increase in population would have a considerable strain on a service that is already stretched to capacity.
 - An increase in crime rates would be expected with an overstretched police force and only a part time police station now available in Prescott.
 - The road network in South Whiston is already stretched to capacity with no alternative routes due to the congestion at the Tarbock Roundabout, traffic lights at Whiston Village t-junction and the circuitous Fox's Bank Lane, a narrow and winding highway. Windy Arbor Road's heavy congestion received from the Tarbock Interchange is exacerbated by the continuously used emergency route of Whiston Hospital's emergency services and further congestion at Whiston Village.
 - Development would significantly increase the number of vehicles using the road network both during and after construction and would also increase noise and air pollution. The road infrastructure would not cope with this increase.
 - Increased traffic will also be a danger to local school children crossing the road to Whiston's primary schools
 - The access would not be very good and it would be difficult getting out of the development.
 - The area under construction is a haven for wildlife the movement of which is now curtailed by the urban boundaries

and those of the M62 / Knowsley Expressway. Further development and loss of Green Belt would ultimately result in further loss of wildlife habitats, which are significant to the areas of biodiversity.

- This wildlife is enjoyed by the whole community and includes foxes, rabbits, water voles, mice, shrews, hedgehogs, woodland rats, squirrels, bats, barn owls, buzzards, cuckoos, woodpeckers, kestrels, skylarks and grey partridges, together with migrating wildfowl at Big Water as well as a huge diversity in insects and flora. The loss of these habitats is unacceptable.
- The remaining woodland, which is not included in the plans, would be severely impacted on with overuse by the public. The quality of this remaining woodland would significantly decrease and the negative impact on wildlife would be significant.
- This proposed expansion will affect some 'user-friendly' pathways that are already well established.
- This will prevent organised walks and fishing hobbies from continuing in a quiet and peaceful natural environment.
- It is a necessity for the local community to keep in touch with the countryside as they use it for recreational purposes, and it forms a "green lung" for the urban area.
- There is potential for the gap between Whiston and Rainhill to be bridged by the new development
- There are potential detrimental impacts on the peaceful and rural surrounds of both the existing cemetery and Halsnead Park. There is currently seclusion, not isolation, which all residents require in their remaining years. The area has the peace and quiet of a country village which will be destroyed with a housing estate.
- There is a possibility of the unruly element using the park as a playground and a shortcut.
- Residents who are overlooking the Green Belt Land, that include Foxshaw Close, Windy Arbor Close, Simons Close and Halsnead Caravan Park have paid premium rate for their properties for the outlook that they have. This aesthetic value would be lost should the plans be adopted. The building of 1400+ houses on the proposed land would severely devalue the properties worth, and may leave some people with negative equity values.
- It is out of step with what residents want. This land should be protected for our grandchildren.
- This would be contrary to the content of PPG2, including the guidance given about the use of land within Green Belts and defining boundaries of Green Belts.
- The Halsnead Park area should be transformed into a leisure area with the 'Old Saunders Nursery' made into visitors centre and ample parking area as well. This would not only enhance this area of outstanding beauty but also provide an area rich in educational values for schools.
- Why has Whiston got the largest proposed expansion into Green Belt land for the development of housing and then after 2027 bigger

commercial area developments, when the areas of the old Pirelli and cables factory in Prescot have not been fully developed yet? Expansion is not the answer if the initial targets of developments in the current areas have not been fulfilled.

B5.46 Location 9: Cronton Colliery (and land south of M62): *Support*

- Welcome is given the proposal that the land south of M62 primarily for employment uses will only be developed after 2027.
- All of Site 8 and Site 9 should be included for release early in the plan period.

B5.47 Location 9: Cronton Colliery (and land south of M62): *Objection*

- The 42 hectare former Cronton Colliery site currently has planning approval in place for use by local communities as a country park. It is acknowledged that there is a need to establish a series of sites in the borough for future employment use and there are clear benefits of such uses in the immediate vicinity to Cronton Colliery on both sides of the motorway. However, the Charitable remit of the Land Trust and the purpose of the trust holding the site is for developing quality open green space for use by the community to improve health, provide an educational resource, protect and enhance the environment, develop social and community cohesion, and also generate economic activity. The Cronton Colliery and adjoining land can provide a resource in each of these 5 areas.

B5.48 Location 8 & 9: Joint Comments in *Support*

- Welcomes the exclusion of Locations 8 (Phase 1 and 2) and Location 9 from the Green Belt and their identification for development. None of these three areas fulfil essential Green Belt functions, and their exclusion is necessary to meet identified development needs and demand. It is also consistent with national policy, especially as the sites together are deliverable within the meaning of PPS3 and PPS12.
- It is contended that the land to the north of the motorway (Location 8) does not make any essential contribution to the purposes of the Green Belt as set out in PPG2. This includes that it does not play a role in checking the unrestricted sprawl of large built-up areas, that it does not prevent neighbouring towns from merging into one another, that it does not assist in safeguarding the countryside from encroachment, that it does not preserve the setting and special character of historic towns and that it does not assist in urban regeneration by encouraging the recycling of derelict and other urban land. This area also meets the criteria for developability as set out in PPS3, including:
 - The site is well-contained by the existing built-up area to the north and west and by the motorway to the south and Fox's Bank Lane to the east.
 - The site is close to existing social, community and retail facilities, It is within walking distance of Whiston Town Centre and the added spending power it would generate would help sustain that centre

- The northern part of the site is within easy walking distance (500 metres) of Whiston Railway Station. The station is also a major public transport interchange
- The site is close to existing areas of employment, including the successful industrial and business estate on the opposite side of Windy Arbor Road.
- Regular bus services run along the roads bordering the site. Due to the scale of the proposed development, there is considerable potential to enhance these services or provide new ones which would run through the site.
- There are no physical or environmental constraints which would prevent development. Parts are best and most versatile agricultural land but this is true for most of Knowsley. The site contains features of nature conservation interest including three SBIs. However many of these features are in poor condition because of lack of management. Hence there is considerable potential for the housing development to provide enhancement through creating linkages in the form of greenspace corridors and long-term management. Equally the site contains the remains of former coal-mining activity. These can be dealt with as part of the housing development process. The site contains some listed buildings and archaeological remains but these can be protected as part of the development, including their relevant settings. The site is not at risk of flooding.
- The overall landscape value of the site is not high. However remnants of the former Halshead Hall parkland including the woodland and lakes remain. These would be preserved and enhanced and would form an important contribution to the character of the proposed housing development
- The site is large enough to provide a full mix of housing types and tenures. It is however especially suitable for aspirational housing for which there is a large need in Knowsley
- The site would help to promote low carbon emissions, partly through its closeness to existing and proposed jobs and facilities, and partly because it allows a large enough critical mass that can support innovative carbon reduction strategies, including potentially combined heat and power.
- The site is fully deliverable for housing. The key parts are within the control of two developers, and discussions are taking place about the remaining land.
- The land to the south of the motorway (Location 9) does make more contribution to Green Belt purposes (in accordance with PPG2) than the land to the north of the motorway but its contribution is not essential. Firstly, the area has been previously developed and is contaminated, and therefore it does not have the character of open countryside. In addition, there are realistic options to provide containment and well-defined and defensible boundaries for the area. Although the development of the site would narrow the gap between the towns of Huyton/Whiston and Widnes, there would remain an effective separation, especially as there would be no inter-visibility

between the various settlements. There is no conflict arising from the development of the site in terms of preserving the historic environment, as Whiston is not a historic town in terms of PPG2. Finally, the development would make a very significant contribution to the economic development objectives of Knowsley. Furthermore, the location is suitable for employment development and meets the criteria set out in PPS4 as follows:

- The site is close to the motorway junction which provides the intersection between the M62 and M57 motorways. The M62 motorway is the most important economic development corridor in the North West and has seen some of the highest levels of development of inward investment activity within the Region. However Knowsley's existing and proposed land supply provides few significant opportunities for economic development within this corridor. The M57 provides important linkages to North Merseyside and has experienced significant economic development in the past. The site's location at the junction of the two motorways is very important.
- The site is highly accessible to John Lennon Airport via the Knowsley Expressway (A5300). The Airport has already witnessed significant growth and is likely to become one of the major economic development poles in the Sub-Region.
- The site would be able to attract businesses within key target sectors identified by the Council because of its accessibility and potentially high amenity. These target sectors include large logistics and distribution users, advanced manufacturing and knowledge based industries, and offices.
- Although the site is not currently located adjacent to the existing urban area, this will change once the land on the north side of the motorway starts to be developed for housing. The layout and development of the two sites can be integrated so that the potential for sustainable transport and carbon reduction measures are maximised.
- A major part of the site is previously developed as it was the former Cronton Colliery. Employment development on the wider site south of the motorway can be integrated with the current proposals by the Land Trust for a country park on part of the former colliery.
- There are no insuperable environmental or physical constraints which would prevent the development of the site for employment. The former colliery land is severely contaminated and contains the remains of previous coal working, including colliery waste and mineshafts. However these constraints would be dealt with as part of the restoration and remediation of the land for employment development and Country Park, provided the development is of sufficient scale.
- The site contains SBIs but these can be integrated into the overall development without harm. The areas proposed for development are not at risk of flooding.

- The development is deliverable. The site is in the in the control of two developers and the Land Trust. Development is viable provided it is of sufficient scale. Nearly all the land required is in the control of two development companies.
- The release of the sites north and south of the motorway represents a major strategic opportunity for Knowsley. In particular, it creates the opportunity for a major strategic gateway development at a key entrance into the Borough off the M62 motorway.

B5.49 Location 8 & 9: Joint comments regarding phasing

- It is considered that the whole area north of the motorway should be planned comprehensively, and the first phase should be off Lickers Lane as it is better placed for public transport and local facilities, including Whiston Railway Station, than the land in the south-west of the site off Windy Arbor Road. These should not be separated into different tiers.
- There is an issue about the timing of the release of the proposed employment development at Cronton Colliery. The site is likely to be more attractive to the key economic development target sectors than the sites currently proposed for release in Tiers 1 and 2. Of special importance, the site is within the key M62 motorway corridor which is one of the prime economic drivers in the Sub-Region. The employment supply proposed by the Preferred Options Report is deficient in sites of this type and potential quality which is likely to mean that important economic development opportunities are lost to the Borough. There is also the advantage that an early release would allow the employment proposals to be integrated with the proposed reclamation of the part of the derelict colliery to a country park and so avoid wasted expense to the public purse. The only reason given for the later phasing of the site is its lack of linkage with the existing urban area. However this can be resolved by integrating the development of the site with that of Site 8 to the north of the motorway, including the creation of new sustainable transport links.
- Alterations to be made include:
 - The two parts currently making up Location 8 - Windy Arbor Road and Lickers Lane - should be shown as one strategic site or broad location. It should be shown in the first phase of releases but the Core Strategy should recognise that its size (1,900 dwellings) means that its contribution to housing supply would be phased over the full plan period (and probably beyond).
 - Area 9 (Cronton Colliery and land south of M62) should be shown for release within the first phase of releases because of the very important contribution it can make to meeting the economic development of the Borough.
- If a choice about which sites to locations to be released in order needs be made, Locations 8 and 9 (land north and south of the motorway) should be given a higher priority for release. These two sites have considerable sustainability and other advantages over the other sites identified as locations for Green Belt release.

B5.50 Location 8 & 9: Master planning

- All of the land proposed for development north and south of the motorway should be planned comprehensively so that it has the maximum strategic and sustainability benefits for the Borough. A Concept Master plan for the whole area has been prepared. Its key features include:
 - The two sites north and south of the motorway would be developed comprehensively.
 - The site to the north of the motorway would be developed for around 1900 dwellings. As part of its development, the existing woodland and water areas would be integrated into an integrated network of greenspace corridors running through the site. The existing historic parkland would be restored and extended so that it becomes a major feature of the development providing identity and character.
 - A wide mix of housing would be produced including affordable units. The emphasis would however be on the provision of aspirational housing of which there is an agreed major shortage in Knowsley.
 - Because of its critical mass, the development would provide a wide range of social and community facilities. It is also of sufficient size to fund other major infrastructure, including public transport initiatives and low carbon technologies. This is an important sustainability advantage over other smaller sites
 - The main vehicular access into the housing development would be off Lickers Lane with secondary accesses off Windy Arbor Road and Fox's Bank Lane. There would also be sustainable transport linkages from other points to ensure full integration with the existing urban area and into the proposed employment development area south of the motorway.
 - The housing development would be phased over the full plan period and beyond.
 - The land south of the motorway would be developed for employment development and integrated with the country park which is being proposed by the Land Trust for part of the colliery site.
 - The employment area would be laid out so that it provides for large logistics and distribution users, advanced manufacturing including knowledge-based industries, and offices. It has the potential to attract types of business occupiers to Knowsley which other sites within the Core Strategy proposed employment land supply could not.
- Treating areas at Locations 8 and 9 as distinct sites, which would be developed separately and over different timescales, would create a missed opportunity and would result in a much less satisfactory form of development. A comprehensive, master planned development over the three sites would have major advantage over a piecemeal approach.
- Both sites should be designated as strategic sites because of their importance to the delivery of the overall development strategy for the

Borough (PPS12 paras 4.6 and 4.7). The alternative is that the sites are identified as Broad Locations for Development.

B5.51 Location 10: Land at Knowsley Village: *Support*

- The land adjoins the boundary wall of Knowsley Park, but the majority of the boundary is screened by belts of mature trees, so that the visual impact into and out of the Park will be moderated. The use to be allocated to the land within the site, where it adjoins the Park wall, needs to be appropriate to enhance the separation of any development from the historic Park. The part of the site at Home Farm Road adjoins the section of the Park wall that has been rebuilt in block work rather than the traditional attractive sandstone.
- The fields adjoining Home Farm Road are subject to trespass and this limits the potential stocking and cropping of the land. It is not possible to keep livestock on the land and any straw or hay produced from the land needs to be removed speedily before it is damaged. The production from this land is a small proportion of the total output of the farm and the removal of the land from the farm holding would not have a significant impact on its profitability. A survey of the land quality will be undertaken and the results provided to Knowsley Council.
- The site is classified as a site of biological importance. This only relates to the occasional use of the land by geese for grazing or as a buffer to the parkland itself which is a site of biological importance. It is believed that the site has very little significance in relation to supporting bio-diversity.

B5.52 Location 10: Land at Knowsley Village: *Objection*

- At Fluker's Brook Lane, Knowsley Village, the area identified includes fine agricultural land. Where is our food to come from? No thought has been given to this at all.
- Opposition is made to the use of land at Knowsley Village for housing. The land should be taken out as its development would lead to a change of character in an area known for its semi rural appearance that is much valued by the local community.

B5.53 Additional / alternative sites

- Scotchbarn Lane, Prescott, which was once Bisley and Fildes, including salesroom and offices, could very easily be converted into a useful housing option.
- The land at the rear and sides of Pottery Close off Pottery Lane, Whiston, which is a small part of Stadt Moers Park, that was once farm land could be utilised for development. There is more than sufficient parkland area within Whiston especially with the ongoing development from the main park area of Stadt Moers along the old railway line leading to the new proposed open area at Cronton Colliery.
- Housing estates should be built at the back of Kirkby where there is no football ground, or at the back of the trading estate. Both areas are full of families.
- At the top of South Ave, Manchester Road, Prescott, there is a cabin plus a grassed area that obstructs the view of any vehicle trying to exit

South Ave onto Manchester Road. Also, in Sewell Street, Prescot, there is a garage for sale, which has been empty for some time, right next to vulnerable person's homes, which is an ideal place for a small bungalow.

B5.54 Land at Woodlands, Knowsley Village

- Green Belt restrictions should be lifted at land at Woodlands, Shannon's Lane, Knowsley Village. The land already has a house on it and is used commercially. There is also planning permission for a retail outlet and storage facility. The land is also very close to the village housing estate, the local shops and amenities, and just across the road from an area that is already being proposed for Green Belt removal within the Core Strategy.

B5.55 Land at Shrog's Farm / Radshaw Nook, Kirkby

- Support is given to the credentials of the land for short term release from the Green Belt for development purposes (employment, hotel and possibly for other uses). The land is ideally placed to accommodate part of the Borough's development needs in the short to medium term future.
- The site has been the subject of considerable discussion and correspondence in recent years, and the possible release of the site was considered by the Knowsley Replacement UDP examination in 2005. The site was then described as "... surrounded by major roads, is no longer viable as an agricultural unit and is in a sustainable location". The site is approx 8 acres and adjacent to a Strategic Investment Area. The site has also been subject to Compulsory Purchase of Property: Notice to Treat since 2003 by Merseytravel for Line 1 for Merseytram.
- The land was considered as part of the Joint Employment Land and Premises Study, and was dismissed as a development opportunity. There are questions around the robustness of the interrogation of the site as part of this study.
- It is felt this site would be the most likely to provide a high profile development and not be in conflict with PPG2. The site has been often promoted to date and warrants inclusion in the category of "Reserved" Tier 1 Locations to meet development needs for employment in Table 5.54 Page 75 of Preferred Option CS5.
- Green Belt around this site it is narrow and dominated by three artificial embankments provided as public engineering works, with high speed roads on top. The site is sandwiched between two of them, and is effectively in a depression and can make little contribution to the openness in such circumstances. The quality of the break between Gillmoss and Kirkby previously benefited from adjacent open land within the Liverpool City Boundary, but this quality has been eroded by the recent large warehouse developments in this area.
- There seems a happier relationship between the built development to the east and open land lying between it and the motorway embankment since the buildings are of a considerably lesser scale.
- Land to the east of the site, designated as Green Belt and in/near a conservation area at Knowsley Village, is included as a preferred

location in CS5. Policy objections have not been raised against the Green Belt sites that are more in conflict with PPG2 than Shrog's Farm.

- It is proposed that the land at Shrogs Farm / Radshaw Nook no longer serves the purposes of PPG2 and accordingly it should be included in the "Reserved" Tier 1 Locations for Employment in CS5.

B5.56 Land at Woolton Waste Water Treatment Works / Weston House

- There is an alternative for development at Halewood which should be considered. This is: to use the land identified for development on the edge of Halewood for mixed use urban extensions, enabling the amount of employment land at Halewood to be increased and a better balance of employment and housing to be achieved; and to identify additional land on the edge of Halewood to be developed for housing.
- The land controlled by United Utilities and Weston House is well placed to form a sustainable extension of the Halewood urban area. It falls in a location which is enclosed by an arc of distinct neighbourhoods within the Liverpool urban area. These neighbourhoods have a range of facilities and services and are already well served by public transport routes.
- New development at this location can be patched in to the existing urban structure in a way that would create an integrated and sustainable pattern of development. There is potential to strengthen infrastructure of services and facilities through the new development.
- There is strong potential to access open space and recreational routes. Development of the site should be progressed so that an effective and commodious network of green space is created, with accessible links between the new and existing areas of development and between the developed areas and the open areas beyond.
- The Green Belt study methodology is flawed and has been misapplied in relation to this site and potentially other locations within the study. The explanation of the rejection of this land is unsatisfactory on many counts. It is felt that the land does not fulfil a gap between Halewood and Liverpool, and keeping the land open is not preventing two neighbouring towns from merging into one another. In addition, the land in question is discrete and well contained in terms of its landscape character. There are well defined and distinct boundaries which provide visual separation from adjoining land.
- It is considered that the two locations in Halewood which are identified in CS5, have been selected contrary to PPG2, due to matters including their characteristics of open countryside, their lack of containment and the role they play in maintaining a gap between Halewood and Widnes.
- If this alternative is rejected, the plan would demonstrably have not followed a process that could lead to the inclusion of the most appropriate strategy having regard to the alternatives, and should therefore be found unsound. This unfortunate outcome can clearly be avoided.

B5.57 Land at Former Walton Sewage Farm / Axis Business Park

- There are compelling reasons why this site should be considered as a principal site to serve long term economic development needs in

Knowsley. The starting point is the overriding need to promote a sustainable pattern of development with employment sites identified which respond to the needs of existing and emerging economic sectors and which are readily deliverable. With this in mind, the site is a strong candidate location for sustainable economic development in accord with the principles set out in CS2 and should play a significant role in the portfolio of deliverable employment opportunities to meet the needs of established and emerging employment sectors in Knowsley.

- The site is within in an area which is subject to redevelopment (Axis Business Park). There is infrastructure in place to serve the subject land but the dominant feature is the neighbouring M57 motorway corridor. A combination of existing development and the motorway corridor reduces or eliminates any perception that this land plays an important Green Belt role in the way that it separates settlements.
- The site is served by high frequency public transport along the A580 and it is accessible to a significant potential employee catchment. This catchment is burdened by low levels of employment and hence every opportunity needs to be taken to improve job prospects. In addition, the essential infrastructure already exists to facilitate timely development, including access infrastructure, utilities and services.
- Axis Business Park is a key project in the Approach 580 Gateway which is promoted by Liverpool Vision as a focus for economic investment on the arterial link between Liverpool and Manchester. The site has the potential to significantly expand the successful development of Axis Business Park and when viewed alongside the remaining undeveloped land at this location, will create a substantial and deliverable opportunity which is well positioned to attract occupiers. The supply of suitable floorspace to meet projected demand is limited (units of over 100,000 sq ft).
- It is a location that has particular advantages over the other sites in the Green Belt identified in CS5, which are not as well served by infrastructure and ownership constraints cast doubt over their deliverability.

B5.58 Land at Junction 4 of the M57 (Epicentre NW)

- Developers are jointly are proposing to bring forward a comprehensive set of proposals involving the establishment of the Epicentre NW sports complex near to Junction 4 of the M57. The complex would incorporate a national facility for polo, other equestrian sports and a regional centre the Modern Pentathlon. Other elements would incorporate a range of homes including some provision for elderly and dementia care, a hotel, an outdoor education centre, and linked commercial/industrial development in the adjacent business park. The proposals would be sensitive to local environmental assets, preserving the open nature of critical areas, enhancing and improving access to local woodlands, planting up firm boundaries against future encroachment, and offering bridleway and footpath network improvements.
- Objection is made the identification of the area as an Essential Gap and it is considered that the north-eastern portion of the site should be released from the Green Belt as this would not alter the material

function of the Gap or purpose of Green Belt. It is suggested that the whole of this location should be kept open in order to define the existing settlement gaps between Kirkby and Knowsley Village and Croxteth. It is considered that the existing gap between Kirkby and Knowsley Village in particular has already been significantly eroded by the expansion of Knowsley Industrial Park down from Kirkby towards Knowsley Village. The industrial park is clearly visible across from Knowsley Lane.

- The initial Green Belt boundary was tightly drawn almost 30 years ago, and has not been subject to detailed review, leaving anomalous pockets of land surrounded by development and similar development incursions into predominantly open areas. While a clear boundary might once have been able to be clearly defined by Knowsley Lane to the east and School Lane to the north, developments to the west of Knowsley Lane have blurred the distinction between the Green Belt and built up area.
- It is important to note that by releasing the north-eastern portion of the site for housing and elderly/dementia care, a significant Essential Gap will still be left. The existing gap is very wide at this location and that it would make a more logical and robust Gap if the width were maintained along this length of the M57.
- This location is preferable to the other identified “Tier 1”, “Tier 2” and “Safeguarded” location within the Green Belt, which are considered to be constrained by issues such as flood risk, existing land quality, accessibility and biodiversity value, and which also have less defensible Green Belt boundaries and options for containment. The location at Junction 4 of the M57 is preferable for a variety of reasons, as follows:
 - The land does not fulfil the purposes of Green Belt, as it is already punctuated by development, it does not prevent the merger of neighbouring towns and it would form a defensible Green Belt boundary.
 - The proposals involve the retention and enhancement of the existing Site of Biological Interest and wider landscape proposals.
 - The site is not prime agricultural land.
 - The entire site is within Flood Zone 1.
 - The site is easily accessible by public transport
 - The site is also in close proximity to the shops and amenities of Knowsley Village and employment opportunities within the nearby Knowsley Business and Industrial Parks, and Village.
 - The development will also benefit from immediate access to recreational land and facilities.
 - The development of the eastern plot for homes and elderly/dementia care will provide much needed additional homes and accommodation in the area.
 - The wider proposals and associated development would include sports and recreation facilities and uses that would not unduly impact upon the overall openness and function of the Green Belt.

- The existing site is currently poorly managed and maintained. The proposals will involve the rejuvenation of the site through the provision of additional landscaping.
- The proposals will benefit Knowsley Village and surrounding urban areas by providing access to sporting facilities and additional recreational space.

➤ *See also comments submitted on Draft Knowsley and Sefton Green Belt Study – Knowsley Report, in Section C of this report. This includes detailed comments on the study methodology and outputs.*

B5.59 Preferred Policy Option CS6: Town Centres and Retail Strategy

Table 14: Preferred Policy Option CS6: Town Centres and Retail Strategy	Total	%
Supportive Comments	4	18%
Non Supportive Comments	9	41%
Other Comments	9	41%
Total Comments	22	100%

B5.60 General

- The Council's intention with respect to retailing in the Borough is to strengthen its existing offer, most notably through the consolidation and regeneration of existing centres. This in itself is non-controversial and in accordance with PPS4.
- Proposals for developing the local town centres, some of which no longer provide an appropriate and varied range of shops, are welcomed.
- Support is given to policies to increase and/or improve upon retail and leisure opportunities within town centres, attracting new and improving existing economy to create better choice and variety.
- New retail should only be developed in centres or locations where existing public transport and other sustainable modes are present and good. Other sites should only be considered when no sites in locations with good public transport and sustainable modes of access are available. In these instances then only sites which can easily acquire good access should be considered, and the provision of this new transportation infrastructure / services should be borne as a cost of development.
- Firm support is given to the Council's policy approach for major retail developments within town centres. Adherence to the very important principle of directing large scale retail developments only to the more major centres of Kirkby, Huyton and Prescot should be paramount. This would maximise the chances of achieving fully integrated transport solutions across this part of the metropolitan area, which should achieve the aim of minimising the frequency and length of additional private care journeys.

- It is questioned whether CS6 will enhance the equal role of Knowsley's centres when the new retail plan for Kirkby will place it much higher than Huyton and Prescott in the Knowsley and North West retail hierarchy. This is likely to make CS6 unachievable as the three centres will no longer maintain their equal role within the Knowsley hierarchy.
- Huyton and Prescott have a significant heritage which is in danger of being totally lost.
- While the individual town centre policies contain aspirations to improve their evening economies there should be overarching guidance in CS6 to relate to this key issue.
- The current wording of CS6 is too restrictive in terms of the potential phasing of comparison goods retail development, with the result that development in one town could be constrained by permissions in another, given all three towns are considered to have equal roles. The inclusion of a phasing table for comparison goods retail development is also inconsistent with the approach adopted for convenience goods retail development. CS6 should also be amended to remove the reference to phasing
- CS6 provides a hierarchy in which Kirkby, Huyton and Prescott have equal status. A conflict arises in CS10: Kirkby Town Centre
- There is dismay at the apparent ease with which retailers of controlled substances such as off licenses and pharmacies obtain necessary licences to trade. These types of retailers sometimes seem to be over-represented in communities, and there are real concerns about the clientele that they attract, often from outside the local area and often during long opening hours.

B5.61 Kirkby

- Greater clarity should be provided as to the Council's intentions for Kirkby Town Centre and the amount of retail floorspace that is expected to come forward in this location. At present, the document is vague and leaves significant concerns as to its impact on higher order centres including that of Liverpool City Centre
- Reference should be made to the granted outline planning permission for Spenhill and that its implementation is regarded as delivering the planned expansion of the town centre.
- The proposed expansion of Kirkby Town Centre is much more modest than the development proposals that were rejected at a Public Enquiry in 2008, and therefore would not have a major detrimental impact on Bootle Town Centre.
- Objection is made to CS10, in particular the expansion of Kirkby Town Centre, on the grounds that there is sufficient land in the existing Town Centre to provide an appropriate retail development within Kirkby. Opposition is given to the inclusion of the residential areas known as Eagles Court, Hadrian's Way and Spicer Grove as part of the Kirkby Town Centre Regeneration Action Area. This objection is given because of the confusing and contradictory messages it sends out. It is felt that there is a real prospect that CS6 will fail due to CS10.

- The Council is seeking "to retain the existing retail hierarchy within Knowsley"..."broadly in terms of PPS4", but this will not be possible to achieve due to the Council granting outline planning permission for the Spenhill / Tesco application.

B5.62 Prescott

- It is suggested that an extension to the hours of car parking from 2 hour to 3 hours in Prescott Town Centre be considered.
- There is a strong view that the Tesco development has been allowed to exert too much influence in Prescott leading to the general demise of the local shopping facilities.

B5.63 Huyton

- Huyton Town Centre is lacking a good variety of shops. Cavendish Walk is a nice development, but have the proposals for the Sherborne Square improvements been cancelled? What is needed is a major retail store, like Marks and Spencer, to come into the area. They would do well and would attract a different clientele to the existing clothing stores.

B5.64 Halewood

- When exactly can it be expected that work will begin on the shopping centre at Raven Court? Residents find it frustrating and annoying to receive publications showing other parts of the borough enjoying facilities long denied to Halewood, which is dependent on a weekly visit from a veggie man, butcher and mobile shop within the district centre. Halewood is getting a raw deal.

B5.65 Floorspace and tables 5.5, 5.6 and 5.7

- Further clarity is required to ensure that the floorspace ranges set out in CS6 and Tables 5.5 and 5.7 are explicit that they relate to new planning permissions granted from 2011 onwards and exclude any previous permissions that may have been permitted but not implemented
- Table 5.6 should be removed and CS6 reworded accordingly. A suggested wording would be "New comparison goods floorspace will be broadly distributed as set out in Table 5.5 'Preferred Indicative Distribution of New Comparison Retail Floorspace 2011-2027'. The phasing of development should reflect market demand, with more development expected in the early part of the plan period." Paragraph 5.3 needs to be amended and updated to reflect the fact that outline planning permission has now been granted for the Kirkby town centre development.
- Policy support is given for the provision of additional retail floorspace over and above that which has recently been approved in Kirkby Town Centre. Whilst the plan period exceeds the timescales for the approved application for the redevelopment of Kirkby Town Centre by some ten years, it is of concern that the Preferred Options document allows for an additional (circa) 15,000 sq.m (gross) of comparison goods retailing to come forward in this location by 2027 (this is unless this takes into

account the demolition and replacement of existing retail floorspace). Allowances should be made for growth during the plan period, given the scale of retail development already approved. However, an additional (circa) 15,000 sq.m seems excessive (particularly for a centre such as Kirkby) and at odds with the conclusions of the Inspector in respect of the application for the redevelopment of the Town Centre that was dismissed in 2008. In the event that the additional (circa) 15,000 sq.m (gross) does take into account the demolition of existing retail provision in the Town Centre (the Preferred Options document does not specify), it is noted that any replacement floorspace is likely to turnover at a much higher level than that of existing floorspace. The Council should ensure that the turnover of proposed replacement floorspace has been properly assessed in compiling its evidence base to support the type and scale of development that is being proposed the emerging Core Strategy. The replacement of existing floorspace in Kirkby Town Centre cannot be seen as 'like for like' and the implications of replacement floorspace vs. existing, including that of impact on higher order centres in the region, should be properly assessed

B5.66 Preferred Policy Option CS7: Transport Networks

Table 15: Preferred Policy Option CS7: Transport Networks	Total	%
Supportive Comments	4	36%
Non Supportive Comments	1	9%
Other Comments	6	55%
Total Comments	11	100%

B5.67 General

- Welcome is given to the support for the Liverpool SuperPort concept and the references made to the importance of both the Airport and Liverpool's Ports. In addition appropriate reference should be made to the Atlantic Gateway, an important regional / sub-regional concept and where appropriate shared objectives should be highlighted.
- The references made to the Airport Master Plan and the support given within the Core Strategy to both the expansion of Liverpool John Lennon Airport and the delivery of the Eastern Access Transport Corridor, are welcomed
- CS4 is broadly compatible with the Waste DPD, including its vision, strategic objectives and sustainable waste transport policy
- The alternative option 7A, to reject not giving support to currently unfunded transport schemes, is supported. This should engender flexibility on future transport solutions. It would also allow for strategic highway mitigation measures or improvement schemes to be brought forward as may be needed within the plan period.

B5.68 Public transport

- The ongoing support of the Council for the rail electrification project is welcomed.
- Strong support is given to the encouragement of a modal shift away from car based transport, and policies which promote sustainable transport. It is recommended that green travel plans are introduced.
- There are six bus stations across Merseyside including Huyton Bus Station. These are major assets and key hubs in the bus network.
- There are issues with bus timetables, connectivity and ticketing synergies between Halewood, Huyton, Prescott and Kirkby. It is questioned whether these issues could be resolved by bus companies working together and Merseytravel and the Council exerting their influence where possible
- Opportunities must be taken to improve public transport provision in Knowsley wherever new development presents them. Despite good public transport links in an East / West direction (especially to the hub of Liverpool) it remains difficult to travel between individual localities of Knowsley. For example, journeys between Halewood in the South and Kirkby in the North are hardly possible by public transport, and those living in outlying areas of Prescott have to use two buses to reach the town centre of Huyton. A greater willingness to influence Merseytravel and the individual transport operators seems to be required
- Buses in terms of their network routes and capacity are generally flexible; however this comes at a cost. Each extra vehicle in the network costs around £100,000 plus per year, every mile costs about £3.50. The cost of accommodating changes to the bus network should be mitigated by locating developments close to existing routes. Detailed designs can make it easy to route bus services directly through development and high quality design is also important. It is recommended that the Council should refer to existing best practice and the Institution of Highways & Transportation (IHT) "Guidelines for Planning for Public Transport in Developments".
- The taxi sector can make an important contribution to improving accessibility to key opportunities and services in particular for Merseyside's most disadvantaged groups and areas. As part of LTP3, there is a need to facilitate a greater role for taxis. There is scope for improved management of taxi ranks including measures such as raised access kerbs or bays to allow safe loading of the less mobile into taxis.
- In the Infrastructure Delivery Plan that will in due course accompany the Local Development Framework and as consideration starts to be given to Community Infrastructure Levy issues, consideration should be given to including to the transport measures outlined in Merseytravel's infrastructure schedule as shared with the Council.

B5.69 Traffic and congestion

- In selecting sites for future residential and employment development, it should be ensured that impacts do not adversely impact upon the strategic road network. It is realised this consideration has to be fairly balanced with the needs of urban regeneration. However potential developers should be required to assess traffic impacts via transport assessments including travel plan considerations.

- Support is given to measures which reduce the need to travel by private car as this should minimise traffic impacts upon the strategic road network. Any new development or land use intensification which would attract significant trip generation should be supported by a robust evidence base which justifies their location in transport terms and where necessary should be supported by a transport assessment.

B5.70 Preferred Policy Option CS8: Green Infrastructure

Table 16: Preferred Policy Option CS8: Green Infrastructure	Total	%
Supportive Comments	4	31%
Non Supportive Comments	2	15%
Other Comments	7	54%
Total Comments	13	100%

B5.71 General

- Strong support is given to this comprehensive approach to Green Infrastructure which will provide the basis of developing detailed proposals over time to ensure that GI will play a significant role in delivering the strategic priorities for Knowsley. Delivery mechanisms outlined are also supported.
- Support is given to the positive and strategic approach to Green Infrastructure in CS8, which recognises the wide range of important benefits that green infrastructure does and can bring to Knowsley
- Green Infrastructure provides opportunities for a wide range of sports including not only pitch based sports such as football and cricket, but also sports such as orienteering, cycling, canoeing, rowing, sailing, motorsports, etc. It is therefore important to seek to maintain Green Infrastructure as it provides a natural resource for sporting activities. The objective to maintain and enhance existing green infrastructure is therefore supported.
- The inclusion of the historic environment in the consideration of Green Infrastructure is welcomed
- Recognition and support is given to the requirement to ensure adequate protection of Green Infrastructure, however it is important to balance this against the need for the Borough to deliver the development it needs in the most sustainable manner. It is important to provide sufficient flexibility and contingencies to ensure that policies do not become restrictive and act as an unnecessary barrier to delivering sustainable growth, potentially resulting in less sustainable routes to growth having to be taken.
- The Council should explain its policy of creating the "corridor effect" in parts of Kirkby - the length of Simonswood Lane from County Road to Quarryside Drive is enclosed by unsightly steel palisade fencing that make this area very unattractive and is visually damaging for local residents. One solution, would be to move the fencing back to restore

some space to improve visually amenity residents enjoyed before the LFC academy was built in the area.

- A corridor effect has been created on County Road Kirkby from its junction with Hall Lane to St. Kevin's Drive. This is a major arterial route into Kirkby that once had open views. To give CS8 integrity, measures should be taken to relieve the sense of enclosure in this area. It is noted that the Longview Lane site in Huyton is circled by Liverpool Road, around a large open green space that has fencing of a high quality and set well back from grass verges facing residential properties. Why do three sites near residential properties receive different policy treatment in different areas of the borough? There is a need for greater consistency on these types of Green Infrastructure issues.

B5.72 Changes / additions

- It is noted that certain aspects of Green Infrastructure are supported by further more detailed policies including CS20 and CS21. It is recommended that a similar policy is provided for biodiversity.
- In relation to climate change, it is suggested that tree planting is added to the list of possible adaptation measures. It is appreciated these are only by way of example, but tree planting will be a significant and achievable means of reducing urban temperatures and surface runoff
- Definitions for Green Space and Green Infrastructure should be set out, together, within the report. This will enable readers to fully understand the process the Council has followed to focus upon the district's Green Infrastructure. There will be areas and sites that are important for biodiversity and community recreation, which are green spaces, but they will not necessarily fall into the Green Infrastructure network. It would be very beneficial if these sites, and their potential, was recognised.
- The primary method of achieving maintenance and enhancement of Green Infrastructure needs amendment. In relation to sport and recreation, there is no explicit reference to protection. This contrasts with strategically important areas of greenspace, assets which function as ecological frameworks, biodiversity, etc. all of which are identified for specific protection. There is reference to improving accessibility for communities to greenspace offering leisure and recreation opportunities, but if such spaces are not protected there is a question of how this can be achieved. The quality of a sports facility is also important as there is little value if accessibility is improved to a playing pitch which has limited or no additional capacity due to being of poor quality.
- There could also be difficulties in terms of applying the definition of Green Infrastructure to some sports facilities. For example, some cricket pitches comprise of a relatively small wicket with a synthetic surface and a large grass outfield. Some football pitches comprise of an entirely artificial grass surface, whilst others are a mix of natural grass reinforced by synthetic fibres inserted into the soil. It is unclear whether such pitches are seen as Green Infrastructure.

- It is usual for playing pitches and other outdoor sports facilities to be located close to built facilities such as changing rooms, spectator facilities, or indoor sport facilities. In such cases it is unclear whether the Green Infrastructure designation would include the built facilities.
- The report should take account of the Liverpool City Region Ecological Framework and how there are opportunities to build upon the existing biodiversity assets within Knowsley and benefit the City Region
- Remove terminology “and the North Merseyside Urban Green Infrastructure Habitat Action Plan”. Terminology should be changed from “site of biological importance” (SBIs) to “local wildlife sites” (LWS) and from “site of geological importance” (SGI) to “local geological sites” (LGS). Combined, there are currently 72 LWS and LGS in Knowsley.
- It should be included that the provision of Green Infrastructure to serve new development must meet the needs of residents “and the environment”.
- A new bullet point should be included in part iv) of CS8: “protect, maintain and enhance biodiversity within and around new developments”.
- There is little reference to ecological functionality in its own right. Recognition should be given to the specific requirement to provide habitats that function.
- The wording “maintenance” can be a double-edged sword in terms of biodiversity. Hence, it is recommended clarity is provided to ensure good ecological potential is not limited by poor habitat management of important sites to nature conservation - in particular, watercourses. Suggested re-wording would include the term “appropriate maintenance”
- Outright protection of areas through both appropriate designations and related policy controls should only be provided where the area/space in question fulfils a clear and measurable Green Infrastructure role, is needed to avoid local deficiencies in standards of open space provision and where it cannot be proven that the benefits of a development would outweigh the harm caused by the loss the area. To achieve this required flexibility, “where appropriate” should be added to the policy wording in relation to protection, management and enhancement of Green Infrastructure.
- Reference should be made to how all new development opportunities will make “space for nature” as set out in the Natural Environment White Paper. In addition, links from the above can be made with the Environment Agency’s “Make Space for Water” guidance.

Chapter 6: Area Priorities

B6.1 General

- It may be clearer if the numbers or headings were changed, or possibly combine both sets of “Key Issues and Opportunities” (i.e. Chapter 2 and Chapter 6) to improve the legibility of the document and avoid repetition.

- The area priorities for both Huyton and Kirkby are broadly compatible with the Waste DPD with respect to employment uses on the relevant business parks and industrial estates.

B6.2 Huyton and Stockbridge Village

- Not enough attention has been given to the opportunities presented by both rail electrification, and building of a line to connect Manchester Victoria and Piccadilly stations, for Huyton. This will mean that the opportunities to travel to and from Huyton will be greatly expanded, and the integration with the bus network is an advantage. So, there could be a potential to attract people to Huyton, rather than Liverpool Lime Street, or Liverpool South Parkway, to commence their journeys, as well as the potential to attract more visitors to Huyton.
- The need to deliver the regeneration of North Huyton and Stockbridge Village as part of the overall objective of delivering a more balanced housing market is not contested. However, in order to deliver a truly balanced market across the whole of Knowsley, support should be given to limited housing growth within stronger housing market areas such as South Huyton. Such areas are able to deliver higher quality, higher value housing which both the Borough and wider Liverpool City Region needs if it is to provide a balanced housing offer capable of supporting stated aspirations to achieve economic growth.

B6.3 Kirkby

- The Key Issues and Opportunities for Kirkby in Chapter 2 addresses heritage assets and identifies the Conservation Area at Risk, however this is not followed through in the Area Priorities for Kirkby in Chapter 6
- The availability of land for housing has seen the permanent loss of open space and playing fields during the last 20 years. This must put limitations on the land supply to meet regeneration needs and opportunities within the Northwood, Westvale and Southdene of Kirkby, as expressed.
- Support is given to the continuing emphasis on the need for comprehensive regeneration of Kirby town centre and the residential area of Tower Hill, linking economic, residential, transport and health issues to create a more sustainable town centre
- The term 'Industrial Park' refers to areas both north and south of the A580, thereby incorporating the Business Park. Both sites are considered as one strategic location. This causes confusion when reading the wider document as it is unclear whether the Business Park is considered by the Council to form part of the Industrial Park in all circumstances or purely within specified options.
- The sentence "...as part of Knowsley's wider Green Infrastructure provision" should be added to the final bullet of the area priorities for Kirkby.

B6.4 Prescot, Whiston, Cronton and Knowsley Village

- There is no mention of provision of community or leisure facilities for Prescot. Scotchbarn Pool is closing, the leisure centre is being down-graded and hence there is no community centre of any description. The

existing Methodist Centre is being used to capacity. There is a large church building which would be ideal for cultural or community use if Council were prepared to do something with it; this should be part of the regeneration plans for Prescott.

- What is development grant of £45,000 for the Prescott Townscape Heritage Initiative being used for and are there any updates on the programme?
- The historic environment is covered in the area priorities for Prescott, but there is no specific mention of the Conservation Area at Risk.
- The unique heritage and historic assets in Cronton are taken into account, which is supported
- An additional bullet point is suggested referring explicitly to a priority for the regeneration of the South Prescott Principal Regeneration Area. It is vital that this regeneration priority is identified and emphasised throughout the Core Strategy. This is equally significant and desirable as the regeneration of Prescott Town Centre. It is especially worrying that this element is not explicitly identified as an 'Area Priority' whilst a review of the Green Belt to meet longer term development needs is. The priority to review Green Belt boundaries will over-ride the need to regenerate the wider South Prescott Area and potentially undermine prospects for this area. The current and emerging national planning policy purpose of Green Belt to "assist in urban regeneration, by encouraging the recycling of derelict and other urban land" is highly significant. There is an argument that the review of Green Belt land for housing should only be countenanced to meet longer term development needs and should not precede the successful regeneration of the South Prescott Area.

B6.5 Halewood

- The proposals in relation to Halewood appear to be a sacrifice of important Green Belt areas and ultimately will contribute to the slow urban sprawl towards the built up areas of Widnes and Runcorn.
- Strong support is given to the identification that an appropriate range of new residential development needs to be provided within Halewood in order to meet local needs. This will include both market and affordable housing, and would provide sustainable development within the Borough.
- Broad support is given to the requirement for additional housing and investment, but there appears to be no account taken of land available for use in adjoining urban areas that can be utilised without relying on Green Belt i.e. land adjoining Jaguar Land Rover, United Utilities land bordering the Transpennine way or a significant surplus of land in Lee Park and Netherley
- The Council is challenged to see how Halewood has declined over the last few years. A nonexistent shopping centre, local pubs closed or closing, working men's clubs derelict and empty, not even a takeaway. It cannot be right that in 2011 residents have to buy newspapers and groceries from the back of van. Residents want to hear when the work (on Raven Court) is going to start and what date is expected for the completion.

- References made to the Airport Master Plan and the support given within the Core Strategy to both the expansion of Liverpool John Lennon Airport and the delivery of the Eastern Access Transport Corridor is welcomed.
- In future drafts of the Core Strategy the proposed link road to the airport should be more accurately labelled as the 'Potential Eastern Access Transport Corridor'.

Chapter 7: Principal Regeneration Areas

B7.1 Preferred Policy Option CS9: Principal Regeneration Area – North Huyton and Stockbridge Village

Table 17: Preferred Policy Option CS9: Principal Regeneration Area – North Huyton and Stockbridge Village	Total	%
Supportive Comments	1	33%
Non Supportive Comments	0	0%
Other Comments	2	67%
Total Comments	3	100%

B7.2 General

- The need to deliver the regeneration of North Huyton and Stockbridge Village as part of the overall objective of delivering a more balanced housing market is not contested. However, there are significant reservations about the ability of weaker housing market areas within the area, to deliver the overall level of housing growth allocated (i.e. 3,060 dwelling net of clearance). Many sites within these areas are constrained by their historic uses and the viability of their development, particularly in the current economic climate, is marginal. Failure to deliver sufficient levels of housing within the urban area will put the Council under pressure to release less sustainable sites. To avoid this pressure and the resultant unsustainable spatial pattern of growth, it is vital that the Core Strategy supports targeted growth in more stable housing market areas which provide more certainty of delivery, e.g. in South Huyton.
- There is no mention of employment land within Huyton in this preferred approach.

B7.3 Preferred Policy Option CS10: Principal Regeneration Area – Kirkby Town Centre

Table 18: Preferred Policy Option CS10: Principal Regeneration Area – Kirkby Town Centre	Total	%
Supportive Comments	5	33%
Non Supportive Comments	5	33%

Other Comments	5	33%
Total Comments	15	100%*
*figures rounded to 100%		

B7.4 General

- The continuing emphasis within the Strategy, on the comprehensive regeneration of Kirby town centre and the residential area of Tower Hill linking economic, residential, transport and health issues to create a more sustainable town centre is supported.
- Kirkby is going to be drastically improved which can only help the area. It all appears to have been brought about by the building of a Tesco store.
- The proposed expansion of Kirkby Town Centre is much more modest than the development proposals that were rejected at a Public Enquiry in 2008, and would not have a major detrimental impact on Bootle Town Centre
- Residents are pleased to see all the changes that are in the pipe line, for Kirkby. A lot of changes to the town centre have happened over the last 50 years, but they have been mostly cosmetic. It would be preferable to have a covered in town centre for much more pleasant for shopping, like Bootle or St.Helens. The design of St Chad's parade could be covered by a dome which would help. Residents do not want more betting shops but do need some big stores like Marks and Spencer, etc. and a DIY shop. It is also important to remember that not everyone in Kirkby has cars to get to the centre.
- The list of town centre uses set out should include those recently permitted under the outline planning permission and therefore also refer to restaurants, pubs/bars, takeaways and cafes, professional and financial services, a replacement health centre and library. It should also be explained that implementation of the recently granted outline planning permission will secure the planned expansion of the centre, which will form part of Kirkby town centre and its primary shopping area.
- Opposition is given to the expansion of Kirkby Town Centre on the grounds there is sufficient land in the existing Town Centre to provide an appropriate retail development within Kirkby.
- An outline application for mixed use development to comprehensively regenerate Kirkby Town Centre including retail expansion south of Cherryfield Drive was approved by the Council's Planning Committee in March 2011. To support this application the Council produced their own study to justify development that will change the Knowsley shopping hierarchy due to the scale of the proposed new retail for Kirkby. Furthermore in 2008/09 the then Secretary of State upheld the findings of a Public Inquiry into retail, and other uses, in and around Kirkby Town Centre, during which the Council and its partners unsuccessfully argued for extra retail to be built south of Cherryfield Drive on a green field site. The Planning Inspector came to the view; "I find that there is no convincing argument that the need for a retail development of an appropriate scale could not be met within the existing centre". As this conclusion was reached as recent as 2009 it raises concerns as to why

the Council is still pursuing the expansion argument whilst at the same time consulting on retaining equal status for its three main shopping centres. There is a real prospect that Policy CS6 will fail due to Policy CS10.

- A conflict arises in CS10, the supporting text for which states that the Knowsley Town Centres Shopping Study identified a requirement for further retail development in Kirkby Town Centre. In addition, it explains "Due to restrictions in the amount of land available within the current town centre boundary this was likely to necessitate consideration of strategic expansion of the town centre, with the land to the immediate south appearing to offer the most appropriate area for expansion". Yet, the policy seeks to provide residential components within an expanded town centre. So is the Council seeking to expand the town centre to include housing at some future date?
- Why is CS10 proposing residential components in Kirkby Town Centre? This is opposed. This is at odds with supporting the demolition of up to 78 properties in Cherryfield Drive to provide a footprint for a new 14,000 sq.m food store.
- The inclusion of the residential areas known as Eagles Court, Hadrian's Way and Spicer Grove as part of the Kirkby Town Centre Regeneration "Action" Area is opposed.
- Issues around Kirkby's poor access to goods and services, and its failure to grow to a sub-regional size centre, were noted in a study completed in 1982. This contradicts the position in the supporting text of CS1 which explains that the town centre's inability to attract a major food store for almost twenty years, indicates it is not capable of meeting modern food operator needs
- There are a number of questions as to why the Council are pursuing the approach in CS10 after granting a planning permission that is in conflict with CS6. These include:
 - Why have the Council failed to take into account a Government decision on the scale of retail development appropriate for Kirkby Town Centre?
 - Why have the Inquiry's findings not been used to formulate retail policy?
 - Having been given a direction of travel by an Inquiry (i.e. that there is no convincing argument for the scale of retail development which could not be met in the existing town centre), why have the Council chosen to ignore it and promote retail development of an "appropriate scale" in Kirkby Town Centre as predetermined by the public inquiry?

Subsequently, there are concerns around why alternative option 10A, which was the option to retain the existing Kirkby Town Centre with no expansion, was discounted.

- The findings of the Council's retail survey and the identified need for 39,700 sq.m gross of additional floorspace together with a new superstore, is questioned. The survey was undertaken two months after an Inquiry and Government decision rejected a plan that included a retail increase that was contrary to the development plan policy for Kirkby Town Centre. This permitted superstore of up to 9,000 sq.m with

a further comparison floor space of at least 2,000 sq.m. It is plainly evident that the Council recycled evidence that had been dismissed by the Public Inquiry some two months earlier.

- Many Kirkby residents hold the view that following the news that the Council had declined to accept an opportunity for a major retail redevelopment of Kirkby Town Centre in 2005, that the Council had other plans to downsize the existing town centre. The permitted Spenhill scheme seems to confirm this as new retail units will be built outside the existing town centre.
- It is uncertain that Kirkby can attract a Primary Catchment Area (PCA) which has a population in excess 225,000 compared to a population of just over 41,000 in Kirkby, to make the Spenhill plan viable.
- There is concern if the policy went forward as currently proposed, due to the level of new retail development discussed in the justification (39,700 sq.m (gross) additional comparison floorspace plus a major new convenience goods superstore). It is understood that the comparison goods element of the superstore is included within the 39,700 sq.m. However, this level of development is significantly higher than the 24,185 sq.m (gross) additional comparison floor space recently approved, and is more similar to the scale of the original planning application that was refused at appeal (47,821 sq.m (gross) additional comparison floor space). This leaves a residual capacity of up to 15,515 sq.m gross. Any retail development in Kirkby Town Centre, over what has been granted planning permission, could undermine the regeneration proposals for Skelmersdale Town Centre. If the policy went forward as is currently proposed, the residual capacity should be tested when the committed scheme is built out and operating in line with the monitoring proposals in CS6.

B7.5 Preferred Policy Option CS11: Principal Regeneration Area – Knowsley Industrial and Business Parks

Table 19: Preferred Policy Option CS11: Principal Regeneration Area – Knowsley Industrial and Business Parks	Total	%
Supportive Comments	1	33%
Non Supportive Comments	1	33%
Other Comments	1	33%
Total Comments	3	100%

B7.6 General

- CS11 refers to the Principal Regeneration Area of Knowsley Industrial and Business Parks and states that the Council will support the regeneration of these areas. However, it has a strong focus on the Industrial Park, particularly when identifying areas suitable for a mix of new employment development. It is felt that this option needs a balanced approach with reference to the regeneration opportunities

that can be secured within the Business Park through the development of mixed use employment-led schemes.

- It has been recognised by the Council that there is a lack of high quality business parks within the borough, therefore the Council should seek to promote sites such as the Knowsley Business Park and allow the delivery of high quality employment schemes which can appeal to new investors as a means to compete with other sites within the wider Liverpool and Manchester regions.
- It is acknowledged within the supporting text that Knowsley Business Park has a high quality built form and public realm, image and market appeal; however this is not reflected within CS11 which currently offers no support to the further enhancement of the Park through elements of mixed use development. The Business Park needs to deliver a broader range of infrastructure as a means to enhance their offering to attract new businesses. It is essential that this is covered within any future policies to ensure it can be delivered.
- Support is given to the Council's objective of enhancing the existing gateways into the Parks, by creating a positive 'first impression' and identity. This will be of benefit to Knowsley Business Park. This can be secured through the delivery of appropriate mixed use, high quality development.
- The gateway locations identified include the location "Boundary Road/Moorgate Road", but this does not adequately identify that the full Academy Business Park site (at A5208 County Road / Lees Road / Harbour Lane) is appropriate for B1 uses. It has always been an aspiration of the Council for a gateway B1 development and the B1 use should not be lost. The site is on the main entrance into Knowsley Industrial and Business Park from the M57 and A580, at the end of Moorgate Road. Many B1 uses can support large numbers of potential staff and therefore the Council should be supporting the potential for significant employment within this area. It is therefore important that the Academy Business Park site is included for B1 use in addition to the B2 & B8 uses already set out in the policy.
- The Academy Business Park site is an appropriate location for the provision of a local service centre to provide small scale shopping services to serve the needs of the workforce within the park. There should be flexibility in uses allowed at the site to complement the area which involves shopping facilities that complement the business park.
- In order that the woodlands within the industrial park "enhance the benefits that these provide as amenity spaces for the users of the Industrial Park", they will need protecting from future development. This is particularly important for Charley Wood, as it is currently under immense pressure. It is advised that this woodland is given appropriate protection and maintained as a community green space and wildlife habitat for the future.
- The approach is broadly compatible with the Waste DPD allocations and policies. Supporting text provides a direct link to the document, but it is not clear what is meant by utilising waste from the industrial park, but that this would not constitute energy from waste. This is contradictory, as although the Waste DPD does not designate specific

sites for this technology, it does include a policy which enables small-scale energy from waste.

B7.7 Preferred Policy Option CS12: Principal Regeneration Area – Tower Hill

Table 20: Preferred Policy Option CS12: Principal Regeneration Area – Tower Hill	Total	%
Supportive Comments	0	0%
Non Supportive Comments	0	0%
Other Comments	0	0%
Total Comments	0	0%

B7.8 General

- No specific comments were made.

B7.9 Preferred Policy Option CS13: Principal Regeneration Area – South Prescot

Table 21: Preferred Policy Option CS13: Principal Regeneration Area – South Prescot	Total	%
Supportive Comments	2	33%
Non Supportive Comments	1	17%
Other Comments	3	50%
Total Comments	6	100%

B7.10 General

- The broad mixed use redevelopment approach to the South Prescot Area is welcomed. That approach has emerged in recent months through positive engagement and negotiation on an initial illustrative master plan for the former BICC/Prysmian Cables site, which forms the basis of an outline planning application submitted to the Council in August 2011.
- There are some concerns that CS13 does not provide sufficient flexibility. It must be borne in mind that the South Prescot Area incorporates land beyond one ownership. It is the case that those wider areas are already or are to be developed for commercial/economic development purposes (e.g. traditional business units, etc. at Prescot Business Park; waste management activities at the Tank House). In order that the policy support the mixed use redevelopment of the larger part of the area, the following changes are sought:
 - There is an unnecessarily narrow definition of economic development which does not, for example, reflect the definition of economic development as set out in PPS4. This is particularly pertinent to the Carr Lane and Manchester Road 'gateway' sites, where other high quality developments may be secured - e.g.

community/leisure; public service buildings; public house/restaurant; nursing home/close care/quasi medical uses, etc. CS13 should allow for this wider range of 'economic development';

- The identification of a precise and inflexible range for residential development is unnecessary and creates a burden on development and the delivery of new homes. It could also hamper the most effective and efficient use of the area in terms of housing delivery, placing a more pressing need for the delivery of homes on Green Belt land. This may also affect economic viability of the scheme and be contrary to the Government's Plan for Growth. There is not any analytical or planning basis for the threshold, nor a justification for this requirement. The current illustrative master plan for the areas indicates a dwelling yield of around 620 dwellings; it is therefore suggested that point CS13 should simply refer to new development of around 600 dwellings for the area.
- It is important that current proposals to establish development and land use principles for South Prescott are not delayed or compromised by the LDF process. Significant investment and resources are being used to plan for its redevelopment. With that in mind it is imperative that proposals are not delayed by having to fit in with the production of site specific policies or SPD which may be some years off. Reference to a site specific SPD is unnecessary as broad proposals for the site should have been defined and approved ahead of any such process. In addition, it would be anticipated that the Site Allocations DPD would reflect the proposals that have emerged for the site. CS13 should, therefore, provide for mixed use regeneration proposals to be brought forward through the Development Management process in the short term.
- Other development opportunities would be appropriate to the South Prescott Area. In particular, given the acknowledged absence of sufficient sites within Prescott Town Centre and Cables Retail Park to meet assessed needs for additional retail development in full, retail and town centre developments of an appropriate type and scale should be considered within the South Prescott Area - subject to the established sequential approach and impact assessments. In parallel to CS6 and CS14 therefore, it may be necessary for CS13 to recognise that retail and other town centre uses may be appropriate, subject to other policy tests.
- The South Prescott Action Area should be allocated for employment uses, and the area or part thereof should not be reallocated for residential uses. There is nothing to gain by doing this, unless it can be demonstrated that Knowsley will meet its forecast housing targets but not its forecast employment land targets during the plan period. When assessed within the SHLAA 2010, the site scored highly for accessibility, but low for physical suitability and achievability due to the site being contaminated with old and/or unsuitable infrastructure, which infers that an extensive and costly reclamation scheme would be required to rectify this situation. In addition, the local environment may

be of concern, with the area bounded by a railway, motorway and industrial development.

- The Prescott Business Park and Tank House area have a valuable role to play as employment land in Knowsley, particularly given the identified shortage of employment land availability in the long term, and should remain as such. In addition, the Joint Employment Land and Premises Study classifies the site as Grade B which it defines as a ‘good employment site...’ The suitability of the site for employment uses is also supported by Property Advisors acted on the behalf of Prysmian Cables & Systems when 61 acres of the site was sold in October 2010. In addition, it is contested that there has been limited interest in the site from the market.
- The nearby Tank House site has recently gained planning consent for use as a Hazardous Waste Facility which will be operational 24 hours a day, and could have impacts on residents sited near to the site, particularly when accounting for the need to segregate housing from heavy industrial uses. Furthermore, the selection of the Tank House site as a hazardous waste facility was decided based on seeking to avoid any detrimental impacts on residential areas which could arise from the industrial operations, or from the 24hr operation of the site. It is suggested that it is unlikely that the aforementioned planning consent would have been granted if the remaining part of Area A of the South Prescott Action Area had already been allocated for housing.
- Land at Carr Lane to the west of Prescott is mentioned in CS13. Subject to the provisions of CS5 with regard to Green Belt review, there is scope for this area to be included within the Regeneration Area boundary. The approach to regeneration in South Prescott outlined in CS13 is founded on mixed use principles guided by an overall master planning exercise. This approach is fully supported but it is felt that this master planning exercise should determine the preferred land use on the subject land. The option of housing or an employment use on the land at Carr Lane would serve to support and not constrain a comprehensive master plan for the South Prescott Regeneration Area.

B7.11 Preferred Policy Option CS14: Principal Regeneration Area – Prescott Town Centre

Table 22: Preferred Policy Option CS14: Principal Regeneration Area – Prescott Town Centre	Total	%
Supportive Comments	1	17%
Non Supportive Comments	2	33%
Other Comments	3	50%
Total Comments	6	100%

B7.12 General

- The aspects of CS14 which seek support the future viability and vitality of Prescott Town Centre are broadly in line with policy in PPS4 relating to planning for centres and main town centre uses. However, other

aspects of CS14 do not satisfy the policy requirements in PPS4 in terms of planning to accommodate the identified need for retail and other main town centre uses, nor do they comply with the guidance outlined in the draft NPPF. This is because CS14 is predicated on an approach which will not ensure that assessed local needs are met in full. Limited site availability within a centre is not a justification for compromising the delivery of retail and leisure development needs. CS14 should be amended to ensure that all of the assessed needs for Prescott are met in full. It is apparent that is likely to require the identification of additional sites beyond the defined centre given the physical and environmental constraints within the centre. Therefore CS14 should indicate that consideration will be given to additional sites, particularly where they can deliver physical regeneration benefits, employment opportunities and increased investment. Elements of the South Prescott area that in good proximity to Prescott town centre and the Cables Retail Park (e.g. Manchester Road) would represent an appropriate and sustainable option for meeting the assessed needs of Prescott for additional retail development.

- Proposals to improve the retail facilities in Prescott and provide better links to the retail park is going to impact greatly on the shops in Prescott town centre. Prescott used to be a vibrant and interesting place to shop, with a mix of unusual retail outlets and the chain stores. Now it seems on some days like a ghost town and it almost appears that some of the shopkeepers have given up.
- The Tesco development has been allowed to exert too much influence leading to the general demise of the local shopping facilities. Therefore proposals for redeveloping town centres are welcomed.
- How has the massive Tesco store in Prescott helped Prescott town centre? If the museum and library needed to be moved, the vacant Somerfield Store in the town centre would have been an ideal place. Tesco should be approached to help bring this, as they must take a huge amount of money from the surrounding area.
- Prescott town centre has declined due to the competition from the retail park having a negative effect on the main shopping street area. There are many beautiful buildings in the town centre, as well as a strong mediaeval history. The town could be rebuilt as a mini-Chester with Tudor-look buildings and new trees and signs, etc. This could be done by local tradesmen and any new shops would provide work for local people. It is recognised that this work would be costly, but some of the buildings could be sold off to local builders at a reasonable price, on the understanding that all properties must tie in with the overall look of the town. Lottery and European funding could be applied for so that shops and banks could be refaced, and there are television shows to apply to which regenerate towns and villages.
- There are many other things that are needed in the Prescott area, including a new leisure park, a cinema and a bowling alley to produce more jobs and facilities for the local community. These could be built outside the town centre - perhaps on the site of the old BICC club.

- Council car parking in Prescot should be extended from 2 to 3 hours, as 2 hours are insufficient for local activities e.g. for attending Prescot Cables football team matches.
- As with the other town centres, bringing in the parking charges, at a time when there are less people going into the town centres because of the economic downturn, was a huge mistake. Shoppers will go to the retail park because it is free to park there, but how does that help the shops in the main streets?
- It is appreciated that the current museum building would have to have costly improvements, but part of the experience of going into the museum is the building itself. The proposals for the new scheme do not indicate that there is going to be much of the museum facility left. The museum is not publicised enough and the dedicated staff do a fantastic job, with little resources.
- It appears that the library and museum, being amalgamated into the One Stop shop will have restricted opening hours, how is this going to help the families who visit both of these attractions?
- Whatever happened to the proposals for the Shakespeare of the North project? This was not given lottery funding, but this just seems to have been totally forgotten.

Chapter 8: Balancing the Housing Market

B8.1 Preferred Policy Option CS15: Delivering Affordable Housing

Table 23: Preferred Policy Option CS15: Delivery Affordable Housing	Total	%
Supportive Comments	4	100%
Non Supportive Comments	0	0%
Other Comments	0	0%
Total Comments	4	100%

B8.2 General

- The Council has a poor record in this area as shown in the recent reports that Knowsley is in the top four for housing repossessions, present homeowners obviously can't afford the housing Knowsley is providing
- Welcome is given to the emphasis on creating a balanced housing market, meeting needs and demands and increasing the delivery of housing at sustainable locations
- Support is given to CS15, which notes the importance of financial viability when providing an element of affordable housing within a proposed market sector housing development. It is vital that this is embraced by the Council when determining proposals for housing developments, particularly during periods of economic downturn. As such, proposals should be assessed on a site by site basis rather than enforcing a blanket minimum of 25% Affordable Housing. This will

ensure that any development is not rendered unviable and will allow the Council to meet its housing requirements

- General support is given to the proposed approach to affordable housing provision and particularly the flexibility within this policy which allows for a lower proportion of affordable housing provision where it is demonstrated with appropriate evidence that 25% provision would be unviable. This flexibility is critical to ensuring that the overall strategic housing requirements of the Borough can be met.
- Although CS15 states that the Council will seek legal agreements with developers to secure affordable housing contributions, the mechanisms of which will be set out within a future SPD, no further detail as to the content of this SPD, or the timetable for its preparation and publication is given.
- The supporting text is objected to as it states that a blanket tenure split of affordable housing between social rented housing and intermediate housing to be 75%:25% respectively will be applied to all residential developments within which affordable housing provision is being sought. Although it is noted that this is suggested within the Council's SHMA, it does not account for the individual circumstances of a site, and could lead to viability issues for a development. As such, this should be re-visited by the Council, and reference to it should be removed from the Core Strategy.

B8.3 Preferred Policy Option CS16: Specialist and Supported Accommodation

Table 24: Preferred Policy Option CS16: Specialist and Supported Accommodation	Total	%
Supportive Comments	2	100%
Non Supportive Comments	0	0%
Other Comments	0	0%
Total Comments	2	100%

B8.4 General

- Welcome is given to the emphasis on creating a balanced housing market, meeting needs and demands and increasing the delivery of housing at sustainable locations
- The plans for new housing should not overlook the specific needs of an ageing population.
- It is encouraging to note that there appears to be a growing understanding that 1-bedroom properties are not popular even among 1 person households, and this should continue to influence the design and development of older people's housing in the Borough.
- Measures to tackle under-occupancy in Knowsley are more likely to be considered by older people if there are realistic options for them to downsize. These options need to extend to owner occupiers and tenants in appropriate proportions.

B8.5 Preferred Policy Option CS17: Housing Sizes and Design Standards

Table 25: Preferred Policy Option CS17: Housing Sizes and Design Standards	Total	%
Supportive Comments	3	100%
Non Supportive Comments	0	0%
Other Comments	0	0%
Total Comments	3	100%

B8.6 General

- Welcome is given to the emphasis on creating a balanced housing market, meeting needs and demands and increasing the delivery of housing at sustainable locations
- Support is given for the proposal that developments of 15 units or more should provide an appropriate mix of dwellings. Ensuring that individual developments provide a mix of dwellings is critical to delivering a more balance housing market across Knowsley.
- Broad support is given to the need for an appropriate mix of dwelling sizes within the Borough, and the need to have regard to evidence of local housing needs and the monitoring of housing completions. However, the supporting table to CS17 is not supported. The SHMA clearly identifies that certain areas require different proportions of a particular type of housing, and that some areas have shortfalls of some types of properties, while others contain surpluses. This table does not allow for this difference, and therefore should not be included within the Core Strategy as a “catch all” requirement for new housing developments within the Borough.
- It is necessary to ensure that any residential design standards within new housing developments imposed by the Council do not render it unviable. This aspect of viability has not been included within CS17, and it is vital that residential proposals are assessed on a site by site basis by the Council to ensure this is taken into consideration.

B8.7 Preferred Policy Option CS18: Accommodation for Gypsies and Travellers and Travelling Show People

Table 26: Preferred Policy Option CS18: Accommodation for Gypsies and Travellers and Travelling Show People	Total	%
Supportive Comments	1	50%
Non Supportive Comments	0	0%
Other Comments	1	50%
Total Comments	2	100%

B8.8 General

- Welcome is given to the emphasis on creating a balanced housing market, meeting needs and demands and increasing the delivery of housing at sustainable locations
- Broad support is given to the approach taken with broad criteria set against which to judge applications. This does give a measure of flexibility which is required given the difficulties experienced in finding sites which are suitable, affordable and available. It is trusted that the Council will take a measured and reasonable approach to enable needed sites to be developed on the ground.
- There is concern that despite the evidence base having been tested through an Examination in Public into the Regional Plan that the council is still equivocal about the need for the identification of a site or sites through an appropriate DPD. The Panel report of the Partial review of the NW Plan remains a material consideration even though in the long term RSSs will be revoked. There is sufficient information to hand at present to proceed with site identification as soon as possible. Failure to do so does inevitably mean further delay. This is inexcusable given the identified shortfall in both the district and region. Hence, any final policy developed should commit to meeting needs identified with a timetabled trajectory as for bricks and mortar housing.

Chapter 9: Promoting Quality of Place

B9.1 Preferred Policy Option CS19: Design Quality and Accessibility in New Development

Table 27: Preferred Policy Option CS19: Design Quality and Accessibility in New Development	Total	%
Supportive Comments	5	56%
Non Supportive Comments	3	33%
Other Comments	1	11%
Total Comments	9	100%

B9.2 General

- Support is given to the strong approach to sustainable development strategic policy in more detailed policies, including CS19.
- Support is given to policies which ensure that the historic built and natural environments are not compromised by future development and that the local distinctiveness of the areas is enhanced.
- The approach is supported as providing the framework for the effective conservation, enhancement and enjoyment of the historic environment and its heritage assets. Particular support is given to the identification of locally important heritage assets
- CS19 makes reference to sustainable development, waste recycling, energy and resource efficiency, and the Code for Sustainable Homes and BREEAM, all of which provide a good link for the Waste DPD and related design policies.

- CS19 includes welcome recognition of the move to zero carbon development and sets specific references to Code for Sustainable Homes and BREEAM, which are linked through to more detailed options later. The reference to energy and resource efficiency is also welcome.
- This policy proposes a disproportional emphasis on the promotion of Knowsley at the expense of historic towns and villages in the borough.
- Proposals to utilise Green Belt land at Whiston for new residential development will directly affect existing homes and is unacceptable. This is contrary to the supporting text within CS19.
- The wording of CS19 could be improved, it could read “protect and where possible enhance...” It is also recommended that more could be said about biodiversity here.
- A new bullet point should be added to the third section of this policy which references “biodiversity enhancements, in line with the Liverpool City Region Ecological Framework.”
- The identities of Kirkby and Knowsley Village have been suppressed are not accurately reflected in this policy approach. For example, Knowsley is a village from which the borough takes its name and not an easily identifiable place as a result. In addition, Kirkby’s identity has been eroded by encouraging companies not to include Kirkby in postal addresses, failure to provide appropriate signage; removal of area names from postal addresses e.g. Northwood, Southdene, etc.
- Within the Knowsley area there approximately 209 recorded mine entries and around 3 other recorded surface coal mining related hazards. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards. Land instability and mining legacy is not a complete constraint on new development, but should be addressed to ensure that this is safe, stable and sustainable. At present the Core Strategy fails to address mining legacy that is present within the area and it provides no policy to address the requirements of PPG14 in relation to unstable land. CS19 should be amended as follows: "Address any issues of land instability, including that arising from mining legacy, to ensure that it is either removed or appropriately remediated through the development process."

B9.3 Preferred Policy Option CS20: Managing the Borough’s Heritage

Table 28: Preferred Policy Option CS20: Managing the Borough’s Heritage	Total	%
Supportive Comments	3	75%
Non Supportive Comments	0	0%
Other Comments	1	25%
Total Comments	4	100%

B9.4 General

- CS20 is supported as it provides the framework for the effective conservation, enhancement and enjoyment of the historic environment and its heritage assets. Particular support is also given to the identification of locally important heritage assets.
- Support is given to policies which ensure that the historic built and natural environments are not compromised by future development and that the local distinctiveness of the areas is enhanced.
- CS20 links well with the policies within the Waste DPD.

B9.5 Preferred Policy Option CS21: Urban Greenspaces

Table 29: Preferred Policy Option CS21: Urban Greenspaces	Total	%
Supportive Comments	3	27%
Non Supportive Comments	1	9%
Other Comments	7	64%
Total Comments	11	100%

B9.6 General

- The proposal to build houses on Green Belt at Whiston is at odds with the policy approach in CS21 and therefore should be abandoned.
- Strong support is given to the content of CS21, but clear and full reference should also be made to Natural England's Accessible Natural Greenspace Standard (ANGSt). ANGSt is specifically aimed at towns and cities and would be ideal for adoption in Knowsley.
- The objective of protecting greenspaces and setting standards is broadly supported. However, it is recommended that the bullet points which set out where development of greenspace would be resisted are amended. Specifically, the third bullet point seeks to resist development which would result in the loss of a greenspace which is suitable to prevent or address deficiencies. However, there will be circumstances where a particular greenspace should be retained because of its value, even if its loss would not result in a quantitative deficiency.
- In terms of the proposed standards, the intention to calculate quantitative standards which would address needs of individual sports is welcomed. Any standards relating to outdoor pitches or pitch team sports should be based on an up to date playing pitch assessment / strategy which has been carried out in accordance with the methodology set out in Towards A Level Playing Field (the recommended methodology for producing playing pitch strategies).
- There is some ambiguity relating to the securing of enhancements to greenspaces. The option states that 'enhancements' to green spaces would be secured through onsite provision or developer contributions. On site provision in my mind suggests that this would be provision of new greenspace as opposed to enhancement of existing greenspace.

Support would be offered to a policy which allowed both for the provision of new and enhancement of existing greenspaces.

- There is a need for a flexible approach to be taken in implementing policies to protect Green Infrastructure to ensure that development is not hindered unnecessarily either where green infrastructure does not perform any valuable function or the benefit of redevelopment would outweigh the harm caused by the loss/part loss of green infrastructure. This flexibility is critical to ensuring the Core Strategy is able to deliver the growth the Borough needs in the most sustainable manner. CS21 confirms that, in considering proposals which would result in the loss of greenspace, these be resisted where the land in question is needed to avoid a deficiency in local provision as measured against established standards. This provides the flexibility needed as outlined above insofar as where no deficiency would result, proposals would not be automatically resisted. However, CS21 also confirms that proposals will be resisted where this would result in significant harm to existing or potential green infrastructure functions listed in CS8. This means the policy is slightly contradictory.
- There may be exceptional circumstances where, notwithstanding that the loss of an area of open space may result in the local area being deficient in provision; this loss would be acceptable when the benefits of the development are balanced against the negative effects of the loss of the open space. Where such circumstances exist, the restrictions imposed by CS21 should not prevent development from being permitted. It is recommended that the first part of CS21 should be amended to read as follows:
 - “Significant harm of existing or potential Green infrastructure functions listed in the first four bullets of CS8.
 - A loss of greenspace suitable in terms of size, location or character to prevent or address individual deficiencies of different types of greenspace, without suitable mitigation being provided through replacement facilities of at least an equal quantity, quality and accessibility, unless the benefits of the proposed development would outweigh the negative impact of the loss of the greenspace...”

The recommended amendment to bullet one and the exclusion of the fifth function of green infrastructure listed in CS8 ensures that this does not contradict bullet two which is specifically concerned with the fifth green infrastructure function listed in CS8.

- The wording should be revised to state “retention of existing trees and woodland, vegetation and other habitat features which offer a positive contribution to the local environment...” Further revised wording should include: “appropriate planting of trees, other soft landscaping and installation of habitats features for the benefit of biodiversity”.
- Halewood Triangle Park could be enhanced with the provision of additional planting, including sycamore trees and horse chestnut trees, which would be of benefit to local children and also to the local squirrel population, who are lacking food. In addition, the area would benefit from a new boating lake with an attendant and a camping area. The existing sculptures are an eyesore and are not in keeping with the local

environment or habitat. The Council's Open Spaces department have been reported over a badly polluted pond in woods that migrating birds frequent but this issue has still not been attended to four months later. Council staff have to answer for their responsibilities as park authorities and have to act according to the law.

- The area under consideration for new development at South Whiston is a haven for wildlife the movement of which is now curtailed by the urban boundaries and those of the M62 and M57/Knowsley Expressway. This wildlife is enjoyed by the whole community and has a huge diversity in fauna, insects and flora. As champion of the National Wildflower Centre it is unbelievable that Knowsley MBC would countenance the loss of such species diversity and the important role they play in the natural and agricultural landscape. Further development and loss of the Green Belt would ultimately result in further loss of wildlife habitats which are significant to the areas biodiversity. The contribution of Stadt Moers Country Park is acknowledged, however it does not provide the amount of space and natural and ancient environment for the diversity of wildlife within the whole of the South Whiston area. The remaining woodland, which is not included in the plans, would be severely impacted upon with overuse by the public, run off polluting water habitats and impacting negatively on air quality.
- The Council aims to improve the quantity, quality and accessibility of open spaces, including the 'green link'... but there will be no Green Belt to link to as there will be commercial sites on these linked spaces in Whiston and Cronton. A path along a disused railway line does not support the rich ecosystem of plants and animals that currently live in the Halsnead Park area.

Chapter 10: Caring for Knowsley

B10.1 Preferred Policy Option CS22: Sustainable and Low Carbon Development

Table 30: Preferred Policy Option CS22: Sustainable and Low Carbon Development	Total	%
Supportive Comments	3	30%
Non Supportive Comments	0	0%
Other Comments	7	70%
Total Comments	10	100%

B10.2 General

- The preferred option on Sustainable and Low Carbon Development is welcomed
- Welcome and support is offered to the strong approach to sustainable development within the document which is taken forward in more detailed policies including CS22.

- This policy is welcome and is supported given the importance of climate change, resource efficiency and energy security issues. The recognition of the energy hierarchy is particularly welcome, as is the reference to efficient use of water and mineral resources, as well as to flood risk and the use of SUDs.
- Support is given to the promotion of sustainable development and innovation in design and policies promoting zero carbon developments are welcomed. All new development should enable sustainable living that will set an example to other areas nationally and internationally. Development should be designed, built and laid out in ways which reduce reliance on the private car; use energy and water efficiently; minimise waste; and keep the carbon-footprint as low as possible.
- Encouragement is given to policies which include appropriate renewable energy targets and positive policies within DPDs to achieve local sustainability targets are welcomed. The inclusion of reference to higher levels of the Code for Sustainable Homes is welcomed. However any such references should seek to improve standards over those given as the minimum under Building Regulations.
- Under the Priority Zones clause, the Council should consider whether the policy should accommodate the identification of future Priority Zones in the future and also the possibility to respond to windfall opportunities.
- The carbon compensation fund is an interesting concept which may have implications for CIL or a future Allowable Solutions regime. This may require some elaboration and a link to be drawn to CS27 which covers developer contributions.
- There is reference to new and/or revisions to existing SPDs, but it is questioned whether this likely to proceed under the latest revisions to the planning regime, which seems to discourage their use.
- It should be made clear that every item within the list of sustainable construction principles is merely a set of guidelines to target rather than a list of set requirements that every new development should meet. At present, this proposal does not provide the flexibility required to impose this type of policy. Although it is accepted that the Government is moving towards a low carbon economy, sites should be assessed on a site by site basis to ensure the overall viability of the site is not at risk.
- The plan period for this Core Strategy is to 2027, and new technologies may supersede this policy, thus providing/encouraging more efficient low carbon techniques in the future and rendering this policy out of date.
- Supporting text explains that energy from waste is not highlighted as a potential solution for decentralised networks in the borough, or within the 'Primary Zone' in Knowsley Industrial and Business Park. Further clarity could be provided to set out that energy from waste does not include CHP for the purpose of this policy.
- Under sustainable construction principles, the bullet which begins "Supplying energy efficiently..." is somewhat misleading and should instead read "Using energy efficiently..." as supply has generation and distribution implications which do not seem to be the subject of the

clause, and a previous bullet has already referred to "Limiting energy use..."

- The approach gives Sustainable Construction Targets for residential and non-residential development. In particular, it identifies that developments should achieve BREEAM Very Good or Excellent after 2019. The need to include this policy is recognised, however it is not considered to have any flexibility and therefore would recommend that additional wording is added such as “subject to the viability and feasibility of provision”.
- CS22 introduces the concept of Priority Zones and Decentralised Energy Networks, but again there is no flexibility within the wording of the policy. It is important that the policy introduces a ‘subject to viability and feasibility of provision’ statement otherwise it could prevent much needed development from coming forward.
- The fourth bullet of CS22 could usefully include waste. Mention of “sustainable waste behaviours” should be “sustainable waste practices”. Supporting text provides a useful link to the Waste DPD, but also rules out energy from waste. It therefore may be worth referring to small-scale energy from waste where this services a particular need, as this would link better with the Waste DPD.

B10.3 Preferred Policy Option CS23: Renewable and Low Carbon Infrastructure

Table 31: Preferred Policy Option CS23: Renewable and Low Carbon Infrastructure	Total	%
Supportive Comments	5	100%
Non Supportive Comments	0	0%
Other Comments	0	0%
Total Comments	5	100%

B10.4 General

- Welcome and support is offered to the strong approach to sustainable development within the document which is taken forward in more detailed policies including CS23.
- CS23 is supported, though the text talks about proposals that produce energy. This should also explicitly support distribution infrastructure, which is a key component of decentralised energy systems.
- Reference to ‘aviation safety’ in respect of CS23 is welcomed. Reference should also be made to Department for Transport / Office of the Deputy Prime Minister Circular 1/2003 in respect of wider aerodrome safeguarding considerations in the plan making process.
- While waste is not referred to specifically within the wording of CS23, the policy wording is broadly compatible with the Waste DPD policies.
- Support is given to CS23, but the wording should be amended in the first paragraph to “provided that they do not cause harm...” rather than “significant harm”

B10.5 Preferred Policy Option CS24: Managing Flood Risk

Table 32: Preferred Policy Option CS24: Managing Flood Risk	Total	%
Supportive Comments	1	50%
Non Supportive Comments	0	0%
Other Comments	1	50%
Total Comments	2	100%

B10.6 General

- This policy option complies with the requirement of national policy and recognizes the importance of addressing flooding issues early in the planning process, and is therefore welcomed and supported.
- It is suggested that the approach is changed to remove the caveat of the requirement for SuDS due to ground contamination or conditions. It is felt that there are enough SuDS techniques to overcome these problems and this would be beneficial to the drainage of the catchment and relieving flooding hotspots highlighted by the Council considering recent pluvial events in the area, e.g. Huyton.
- It is recommended that the Council considers a Level 2 Strategic Flood Risk Assessment, to examine in more detail critical drainage areas and areas which could be within Flood Zone 3b (Functional Floodplain), as identified in CS24.

B10.7 Preferred Policy Option CS25: Management of Mineral Resources

Table 33: Preferred Policy Option CS25: Management of Mineral Resources	Total	%
Supportive Comments	2	50%
Non Supportive Comments	1	25%
Other Comments	1	25%
Total Comments	4	100%

B10.8 General

- Support is given to the preferred policy approach.
- With specific reference to Cronton Claypit, it would be advisable to discuss the feasibility of a Minerals Safeguarding Area designation with the owners of the site and also the Waste DPD team to ensure full compatibility with the owner's plans and the Waste DPD.
- While this approach is generally supported, it is recommended that additional flexibility be built in to the process of identification of Mineral Safeguarding Areas in the allocations DPD, as room needs to be left to respond to emerging practice in this area. Such a restrictive MSA policy may not prove sustainable.

- The approach to mineral resources is considered fundamentally unsound. This is because the approach:
 - Fails to reflect the requirements of MPS1 to safeguard minerals as far as possible
 - Fails to take account of the MPS1 Practice Guide and the BGS document 'A Guide to Mineral Safeguarding in England'.
 - Ignores the importance of safeguarding surface coal resources and avoiding their unnecessary sterilisation is set out in MPG3 and in the emerging Draft National Planning Framework.
 - Fails to address the potential for the prior extraction of minerals
 - Fails to account to Knowsley's potential contribution to energy security through its coal resources
- The Minerals Safeguarding Area (MSA) for the surface coal resource should be amended to cover the whole geological resource across the DPD area without exception. Alongside this there needs to be a policy focussed on promoting the prior extraction of mineral resources where non-mineral development is proposed in order to prevent the unnecessary sterilisation of resources. The Council has the opportunity to rectify this fundamental policy deficiency ahead of examination through the publication version. It should be noted that the Planning Inspectorate Guidance makes it explicit that it is necessary to identify MSAs on the Key Diagrams accompanying the Core Strategy with their precise boundaries then being delineated in a DPD such as a Site Allocations document.
- It is suggested that the following changes be made to policy wording to the second criterion of CS25: "Mineral Safeguarding Areas in the general location of Cronton Clay Pit and for the surface coal resource are shown on the Key Diagram and will be identified in the Site Allocations and Development Policies DPD. Proposals for non-minerals development will be required to consider the potential for the prior extraction of the minerals and to demonstrate that the mineral resources in that area will not be sterilised in accordance with the criteria to be set in the Site Allocations and Development Policies DPD..."

B10.9 Preferred Policy Option CS26: Waste Management

Table 34: Preferred Policy Option CS26: Waste Management	Total	%
Supportive Comments	2	67%
Non Supportive Comments	0	0%
Other Comments	1	33%
Total Comments	3	100%

B10.10 General

- Support is given to the preferred policy approach.

- The report takes account of the Waste DPD and most sections of the report were found to be broadly compatible with the Waste DPD vision, strategic objectives and development management policies.
- CS26 represents an important inclusion, which is both compatible with the Waste DPD vision and strategic objectives, but also provides an essential link between these two Knowsley LDF documents. Certain paragraphs of supporting text will need to be updated prior to the subsequent stage of Core Strategy preparation, given progress with the preparation of the Waste DPD.

Chapter 11: Infrastructure Delivery and Funding

B11.1 Preferred Policy Option CS27: Planning for and Paying for New Infrastructure

Table 35: Preferred Policy Option CS27: Planning for and Paying for New Infrastructure	Total	%
Supportive Comments	4	50%
Non Supportive Comments	0	0%
Other Comments	4	50%
Total Comments	8	100%

B11.2 General

- The inclusion of culture in this policy is welcomed. The preferred approach is sensible as it recognises that it is more sustainable to improve existing infrastructure than build new.
- Whilst the final mechanism has yet to be identified, the principle of securing infrastructure and / or contributions to pay for infrastructure which includes indoor and outdoor sport facilities is supported.
- Lottery funding is available for local authorities to bid for funds to protect and improve playing fields. A robust and up-to-date playing pitch assessment is required to support bids.
- Waste is not explicitly mentioned, except in the table outlining infrastructure categories, although waste is an essential element of any community. It is implicit that the policies and text are compatible with the Waste DPD.
- The ongoing support of the Council for the rail electrification project is welcomed.
- Opportunity to comment on further revised and updated versions of the Infrastructure Delivery Plan would be welcomed at the appropriate stage. In addition, a dialogue in relation to matters of detail on developer contributions in providing an effective mechanism for supporting any infrastructure improvements on the strategic highway network would be welcomed.
- Support is given to the Council's confirmation that due regard will be given to the potential impacts of developer contributions for infrastructure provision, and other policy requirements on the economic

viability of new development. Any contributions requested by the Council in relation to new development must ensure this is adhered to.

- Any developer contributions arising as a direct result of any new development must be compliant with National and Development Plan policy and future CIL requirements
- It is critical that infrastructure is in place to deliver the Plan, in particular it is critical that adequate public transport infrastructure is in place, minimising unnecessary travel by non-sustainable means. It is also important to ensure there are sufficient high quality educational, social and leisure facilities.
- The approach should include Local Wildlife Sites within the open space category.
- Within the infrastructure categories defined, the open space section should also include “important wildlife habitats”. The term “green public realm” is repeated twice in this section.
- Infrastructure categories should also be revised to include the category “water-bodies” with sub-categories including “rivers, streams, ditches, ponds, lakes, canals and reservoirs”.
- When the expansion of housing is being considered, or discussions around the suitability of settlement site for travellers, to what extent is access to religious establishments/ places of worship, and access to children’s centres considered?
- Regarding transport infrastructure, the following issues are noted:
 - Buses are more flexible but this comes at a cost. The cost of accommodating changes to the bus network should be mitigated by locating developments close to existing routes, detail design issues to make it easy to route bus services directly through development and finally high quality design is important.
 - The Council should refer to existing best practice and the Institution of Highways & Transportation (IHT) "Guidelines for Planning for Public Transport in Developments".
 - There are six bus stations across Merseyside, including one at Huyton within Knowsley, which are major assets and key hubs in the bus network.
 - The taxi sector can make an important contribution to improving accessibility to key opportunities and services in particular for disadvantaged groups and areas. There is scope for improved management of taxi ranks including measures such as raised access kerbs or bays to allow safe loading of the less mobile into taxis.
- In the Infrastructure Delivery Plan and as consideration starts to be given to Community Infrastructure Levy issues, consideration should be given to including the following transport measures, as well as smarter choices measures, if possible:
 - Welcome would be given to a statement of support for the Merseyside & Halton Freight Quality Partnership and the Merseyside Taxi Quality Partnership
 - Improving partnership working with Knowsley Council in regard to improving management of coaches (both scheduled and tourist) to ensure adequate layover infrastructure is provided.

- The improved management of taxi ranks including measures such as raised access kerbs or bays to allow safe loading of the less mobile into taxis. This will help ensure a high quality customer experience for those using taxis.
- Capitalising on opportunities arising from the Northern Hub project which will help relieve the bottlenecks on the rail network in the Manchester area and open up new journey opportunities across Northern England.
- Further rail electrification in the future such as the North Transpennine Line (Manchester-Leeds-York), Cheshire Lines Route (Liverpool to Manchester via Warrington), Crewe to Chester, Manchester to Bolton, Wigan and Southport.
- In the run up to High Speed 2 being implemented, further development of rail services on the West Coast Main Line to increase frequencies on the Liverpool to London route via additional services and create new journey opportunities such as direct train services from Liverpool to Scotland (e.g. Glasgow and Edinburgh) and from Liverpool to the South Coast and South West
- Provision of level, step free access infrastructure such as lifts and ramps to enable access for all at many of railway stations in Merseyside
- Possible future provision of station travel plans, which will seek to manage patronage growth, minimise the negative impacts on communities caused by rail stations, improve ticketing and information, embrace the full range of sustainable modes of travel and bring together the full range of stakeholders.
- It would be helpful to encourage faster and better broadband coverage to homes and businesses as this will help reduce the need to travel, enable further development of alternatives to travel such as home working and video conferencing etc. This includes greater coverage of Wi-Fi across the city region and further afield. This digital infrastructure is also especially important for emerging Real Time Information Strategies for transport which is likely to involve linking with Wi-Fi and internet, including the provision of real time customer information screens (CIS)
- Support is given for new transport buildings to achieve a BREEAM "Very Good" rating or equivalent CEEQUAL rating. Other green infrastructure measures to consider could include infrastructure related to climate change adaptation such as tree planting to shade car parks/road surfaces, sustainable urban drainage, resurfacing, bridge maintenance, etc. and wildflower planting along transport corridors to improve biodiversity.

Appendix A: Monitoring Framework

BA.1 General

- Support is given for the range of indicators for monitoring the objectives relating to the natural environment, especially those specific to monitoring improvements in biodiversity.

- The framework should also include the condition of locally designated wildlife sites as a way of monitoring the impacts of development and / or increased population upon these valuable areas. This could be achieved through species monitoring.
- Monitoring indicators MI115, MI124 and MI125 are also linked to policies CS19 and CS21.
- MI141 and MI142 are the same.
- There do not seem to be references to the sources of the monitoring indicators and therefore it is unclear where they have been derived from and whether they are still appropriate. It is not clear whether MI144, MI145 and MI146 are old National Indicators or whether these still stand.

Appendix B: Glossary

BB.1 General

- There are small theatres groups in the district which provide a valuable outlet for young people and these facilities should be recognised within the term “community facilities”.
- The glossary contains an explanation of what is meant by the term “community facilities” for clarity and ease of reference, and it is recommended that this include “community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.”
- Terminology should be changed from “site of biological importance” (SBIs) to “local wildlife sites” (LWS) and from “site of geological importance” (SGI) to “local geological sites” (LGS).
- The definition for Local Wildlife Sites should be: “Local Wildlife Sites, known as Sites of Biological Interest (SBI) in the UDP are areas of land with significant wildlife value. Typically they can comprise a wide variety of sites including woodland, grassland meadows and water-bodies”.
- The definition for Local Geological Sites should be: “Local Geological Sites, known as Sites of Local Geological Interest (SLGI) in the UDP are areas of significant geological interest. They can comprise features such as rocky outcrops, road/rail/rover cuttings and historic quarries”.

Appendix D: Schedule of UDP Policies

BD.1 General

- CS8, as well as CS21, will work towards replacing UDP policies ENV9 and ENV10. This should be included.

SECTION C – WRITTEN RESPONSES TO THE PREFERRED OPTIONS EVIDENCE BASE OR SUPPORTING ASSESSMENTS

Draft Knowsley and Green Belt Study – Knowsley Report

C1: 41 individual responses relevant to the report, issues as summarised as below;

C1.1 General

- The potential release of land within the Merseyside Green Belt following an isolated partial review could have a negative impact on the implementation of the wider strategy of regeneration across Merseyside as a whole.
- Any release of Green Belt land will need careful planning and design to ensure that biodiversity, nature conservation and Green Infrastructure are adequately taken into account when the land is allocated.
- It is considered that the Council has incorrectly allowed the Green Belt Study and specifically the locations the Study deems suitable for Green Belt release to dictate which sites should come forward at part of the Council's preferred strategy. In doing so, the study has not promoted sustainable patterns of development over the maintenance of the Green Belt.
- It is felt that the Study's methodology which discounts land for development due to its effect on Green Belt purposes in an incorrect approach.
- Generally supportive of the methodology employed by the Study and (subject to detailed points) it is considered generally a robust and transparent document.
- It is considered that urban extensions within the Green Belt should only occur where public and sustainable transport provision exists.
- It is considered that the principles of PPS3 should govern the phased release of Green Belt locations.
- Recommend that the criteria for Green Belt release should take account of current and potential use for sport and recreation.
- Object to proposals to develop Green Belt sites currently or last used for sporting purposes unless it can be demonstrated the site is surplus or replacement provision can be delivered in a suitable location.
- It is considered that the Study's approach to flood risk is incorrect. All sites identified should be considered as part of a sequential approach as required by PPS25.
- Concern that the "sustainability" assessment in the Study omits services outside Knowsley's administrative boundary.

C1.2 Site specific comments – Huyton / Stockbridge Village

- Objection to the release of Green Belt land adjacent to Edenhurst Avenue due to a number of issues including, increased flood risk, unsafe vehicular access, lack of local facilities and the site's limited

potential to improve the local housing market or deliver affordable housing.

- Objection to Green Belt release at Edenhurst Avenue due to the Government's policy on "windfall" developments only being permitted in exceptional circumstances
- It is considered that the reasons for Knowsley Council refusing a previous application at Edenhurst Avenue are still valid and the area of land should not be released from the Green Belt.
- It is considered that the proposed release of Green Belt land at Edenhurst Avenue (Area No. 17) would exacerbate existing flood risk issues.
- Support for the release of Green Belt land at Knowsley Lane, Huyton (Area No. 7) as development in this location is unlikely to have an impact on Knowsley Park and will have a minimal impact on food production.
- Objection to Green Belt release at Knowsley Lane, Huyton (Area No. 7) as the site provides a link to the historic nature of Knowsley Village and its release will generate urban sprawl which is in conflict with PPG2.
- It is considered that the implications of the loss of farm land at Knowsley Lane (Area No. 7) should be re-appraised and other areas of Green Belt land considered.
- The Green Belt at Knowsley Lane, Huyton (Area No. 7) provides a natural buffer between the motorway and the residential areas to the south of the area and should be retained in the Green Belt.
- It is considered that the land at Knowsley Lane, Huyton (Area No. 7) provides a variety of recreational facilities such as stables and riding provision which is in line with paragraph 5.38 of PPG2.
- Objection to the grouping of parcels K027 and K030 to form a logical boundary for the Green Belt. The grouping of the parcels ignores the physical benefits provided by K030 and does not constitute "exceptional circumstances".
- Suggestion that an alternative option for Green Belt release at Knowsley Lane, Huyton (Area No. 7) would be to allocate a small area of land adjacent to the motorway junction (to the east of the area) for the development. This would allow the farm at Knowsley Lane to continue to operate.
- Support for the Green Belt Study's conclusions that land at Edenhurst Avenue (Area No. 17) represents a sustainable development location.
- It is argued that land at Edenhurst Avenue is more sustainable than the Green Belt Study's assessment suggests, primarily in relation to highway accessibility and access to medical services.
- It is considered that there are more positive impacts from the development of land at Edenhurst Avenue (Area No. 17) than is concluded by the Green Belt Study's analysis at stage 4d.
- It is considered that development at Edenhurst Avenue (Area No. 17), avoiding Flood Zone 3, would not visually terminate or contain the site.

C1.3 Site specific comments – Kirkby

- It is considered that the release of Green Belt land at Bank Lane, Kirkby (K001) would create a continuous urban link between Kirkby and Melling / Sefton and would therefore be in conflict with national Green Belt policy.
- The Council has not demonstrated exceptional circumstances required by PPG2 in relation to Bank Lane, Kirkby.
- Suggestion that Shrogs Farm / Radshaw Nook, Kirkby should be released from the Green Belt as it could provide high profile development, does not conflict with the principles of PPG2 and represents a sustainable employment location.
- The proposed release of Green Belt land at Bank Lane, Kirkby (Area No.1) for residential development would have a very limited impact on Sefton's residents.
- Support for the release of land to the east of Knowsley Industrial Park (Area No. 4) as it will not have an adverse impact on Knowsley Park. The area forms a small part of a much larger farming unit; therefore it will not have a significant impact on the viability of that business or food production.
- Support for the inclusion of land at Bank Lane, Kirkby (Area No. 1) as a site suitable for Green Belt release. Generally it is considered that the Bank Lane site should be scored as "major positive" and brought forward at the earliest opportunity to support regeneration of the local area.
- Land at parcel K008 is within a highly sustainable location and has the ability to meet emerging employment needs. It is considered that K008 contributes little to preventing neighbouring towns from merging and its release would not harm the integrity of the Green Belt.
- It is considered that land at Shrogs Farm (within parcel K013) has a distinct character and is isolated from surrounding land. Therefore Shrogs Farm has been incorrectly grouped into a wider parcel of land K013.
- It is suggested that development at Shrogs Farm would not prejudice any of the five Green Belt purposes, should score well at Stages 3a, 3b and 4 of the assessment and should be release for development.
- It is considered that land at Shrogs Farm could be developed for a variety of uses and its strategic location would be attractive to inward investors.
- The proposed Epicentre NW (at parcel K018) would not unduly impact on the overall openness and function of the Green Belt.
- Object to the identification of parcel K018 as an Essential Gap. The north eastern portion of the parcel should be released as this would not alter the material function of the Green Belt.

C1.4 Site specific comments – Prescott, Whiston, Cronton and Knowsley Village

- There will be unacceptable impact on wildlife and biodiversity as a result of the proposed development of Green Belt land south of Whiston (Area Nos. 14 and 16).

- Propose K039 as an alternative site for Green Belt release due to an apparent oversupply of park land in the locality.
- Objection to the inclusion of land to the south of Whiston due to the loss of amenity value, biodiversity and the adverse impact on local food production.
- It is considered that “special circumstances” in the context of PPG2 do not exist for the release of Green Belt land south of Whiston.
- It is recommended that land at Whittakers Nursery (Area No. 8) is not released from the Green Belt as it forms a vista to/from Prescott along Liverpool Road.
- Objection to the release of land at Carr Lane, Prescott (Area No. 10), due to the site being in use as part of Huyton Golf Club.
- It is considered that the release of Green Belt land at Knowsley Village would alter the area’s semi-rural appearance.
- It is recommended that land at Shannons Lane, south of Knowsley Village should be released from the Green Belt as it is already partially developed, is being used commercially and is close to existing amenities.
- Query the existence of exceptional circumstances, as required by PPG2, which justify the release of Green Belt land south of Whiston.
- Support for the release of land to the east of Knowsley Industrial Park (Area No. 4) as it will not have an adverse impact on Knowsley Park. The area forms a small part of a much larger farming unit; therefore it will not have a significant impact on the viability of that business or food production.
- It is considered that the majority of the land at Knowsley Village (Area No. 6) is screened from views to and from Knowsley Park by trees. The area also borders areas of Knowsley Park’s estate wall which have been rebuilt in brick rather than traditional sandstone methods. Therefore the visual impact of development in this area will be moderated.
- Food production from the land at Knowsley Village (Area No. 6) is limited due to trespass, antisocial behaviour and the in-ability to keep livestock on the site. Therefore the removal of the land from the wider farm holding would not have a significant impact on its profitability.
- Query the biological value and Site of Biological Interest designation at Knowsley Village (Area No. 6) as it relates to the occasional use of the land by geese for grazing or as a buffer to the park land itself which is also part of the Site of Biological Interest.
- Support for the inclusion of land at Carr Lane, Prescott (Area No. 10) as a location for Green Belt release. Suggestion that the site would be suitable for either housing or employment uses, subject to master planning of the wider south Prescott regeneration area.
- There is a conflict between the emerging Core Strategy’s stated aims of improving the quality of open space and allowing commercial development in the Green Belt and specifically at Cronton Colliery.
- Support for the release of the Green Belt land south of Whiston and at Cronton Colliery as both areas can be released without harm to the Green Belt’s essential purposes. Land at Windy Arbor Road and

Lickers Lane (Area No. 8) should be shown as one strategic site or broad location.

- The Green Belt land south of Whiston (Area No. 14 and 16) and at Cronton Colliery, including adjacent land (Area No. 18) should be comprehensively master planned to ensure maximum benefits are delivered.
- Support for the identification of parcel K048 for potential Green Belt release prior to 2027.
- It is considered the assessment of parcel K048 should be amended to demonstrate the location does not include biological interests, listed buildings, playing fields or a golf course.
- It is considered that Cronton Colliery and adjoining land (Area No. 18) can provide valuable community, educational and environmental assets.

C1.5 Site specific comments – Halewood

- The release of Green Belt land at Baileys Lane, Whiston (Area No. 21) would result in a weak Green Belt boundary, which would be contrary to national Green Belt policy.
- It is considered that the rationale for combining the Green Belt Area No. 20 and 21 north and south of a railway line respectively is weak as the areas are physically and visually separated by a railway line and associated embankment.
- Following the proposed release of Green Belt land at Baileys Lane, Halewood (Area No. 21) the resultant Green Belt boundary would be weak and lead to pressure for further release from future Green Belt reviews.
- The Green Belt purpose “to prevent neighbouring towns from merging into one another” has not been applied correctly in relation to Green Belt land north of Halewood.
- It is considered that the land to the north of Halewood which is controlled by Weston House and United Utilities is suitable to form an urban extension with a capacity of approximately 600 to 750 homes.
- The Green Belt land north of Halewood is enclosed by a number of distinct neighbourhoods and has access to a range of services.
- It is considered that land at parcel K081 is well contained and does not have the character of open countryside.
- It is considered that the land at parcels K086 and K089 have characteristics of open countryside and are not well contained. Development of these parcels would be in conflict with elements of PPG2.
- Objection is made to the release of Green Belt land to the east of Halewood as the proposals fail to consider the infrastructure required to support the additional development.
- Support is given for the release of Green Belt land to the east of Halewood which can deliver a mix of housing within the area.
- Support is given for the release of Green Belt land to the east of Halewood (Area No. 20 and 21) as development in this location will not

conflict with any of the stated purposes of including land in the Green Belt.

- It is considered that Green Belt land to the east of Halewood (Area No. 20 and 21) is not subject to any prohibitive constraints that would prevent development for residential purposes within the emerging Core Strategy plan period.

C1.6 Site specific comments – Other Areas

- There is concern that the Study fails to address the potential needs of neighbouring towns such as Widnes.

Draft Technical Report: Planning for Housing Growth in Knowsley

C2: 4 individual responses relevant to the report, issues as summarised as below;

- It is accepted that any final housing requirement must also balance the impact on the Green Belt but the difference between the combined total (1,048dpa) of the affordable housing need and demand for market housing, and the level of housing proposed (450dpa) is such that there would need to be an overwhelming case to justify such a low provision.
- The proposed housing provision (450dpa net) is significantly less than the housing needs and demand for either market or affordable housing set out in the SHMA.
- It is agreed that the release of approximately 11,000 Ha of Green Belt land to accommodate an annual housing target of 1,048dpa would not necessarily be appropriate or sustainable.
- It is considered that due to the existing backlog and the massive housing demand as identified by the SHMA, a higher housing target of 525dpa would be more appropriate.
- The level of housing provision is actually well below that of RSS as it is not meeting the existing large shortfall which has been created by under-provision in the period 2003-2010. If this shortfall were to be made up over the plan period, the Core Strategy requirement would have to be increased to 525dpa – an increase of some 17%.
- There is already an existing deficit of over 1,500 homes, which has been further compounded by the historically low housing delivery experienced during the previous financial year. Therefore, the need for an immediate, major boost in housing development in Knowsley is critical.

Draft Technical Report: Planning for Employment Growth in Knowsley

C3: 3 individual responses relevant to this report, issues as summarised below;

- The report appears to have not taken the opportunity to review the existing allocations for the two townships, (Kirkby and Prescot) that have an oversupply of employment land relative to housing provision.
- Whilst the majority of existing allocations are within existing employment areas and appear logical employment sites, they include

nine greenfield sites of which five are located on the periphery of Knowsley Industrial Park. Why have these sites been automatically included in the supply figures, given the apparent over provision of employment land in the Kirkby township?

- Support is given for the use of the long term historic take-up rate as the basis for the projection of employment requirements over the plan period.
- It is agreed that econometric projections would not provide a reliable basis to assess future requirements.
- It is considered that an element of 20% should be added to the historic take-up rate to allow for range and choice and the 'churn' factor. It is standard practice to include such an allowance, as both the Joint Employment Land and Premises Study and the Draft GVA study recognises.
- It is highly unlikely that all the employment land identified will be developed within the plan period for a mixture of deliverability reasons, including ownership, physical and marketing factors. Therefore, to provide a land supply equivalent to past take-up, would mean that those take-up rates would not be achieved over the plan period.
- There is a need to provide developers and occupiers with a degree of range and choice and also to provide some ongoing supply at the end of the plan period.
- The long-term rate used (12.73 ha per annum) is an average over some 13 years but is unduly influenced by Knowsley's poor performance since 2003/04.
- The Core Strategy should provide for an employment provision of at least 311.76ha, including an allowance for 20% uplift in past take-up rates and 20% flexibility factor for range and choice.
- The distribution of the employment provision is supply led rather than strategy led. It would be desirable for the level of jobs for which provision is made in each township to at least be in balance to maintain present patterns and to avoid increasing commuting into or out of the townships.

Draft Technical Report: Spatial Profile of Knowsley

C4: 1 individual response made specific reference to this report, as summarised below;

- There is no conscious shift in the existing situation proposed to address what the evidence says about parts of the District at present, or to help bring about any particular role for Halewood in the future.
- The spatial profile for Halewood strongly suggests that a greater proportion of the plan's District housing provision should be directed to Halewood in the plan than would simply maintain the existing pattern.

Interim Sustainability Appraisal

C5: 1 individual response made specific reference to this report, as summarised below;

- The Interim Sustainability Appraisal refers to key sustainability issues to be identified, including the biological and chemical condition of rivers needing to be improved.
- There are very few references to rivers in context of their potential value to Knowsley e.g. green infrastructure, recreation, wildlife etc.
- Important waters (that are also Water Framework Directive water bodies) in this area include the River Alt, Croxteth/Knowsley Brook and Simonswood Brook, Ditton Brook, Dog Clog Brook, Mill Brook and Prescott (Logwood) Brook. No mention is made of the need to improve any of these waters. However, Local Authorities have a duty to “have regard” to the Water Framework Directive.
- All of the surface waters currently fail the Water Framework Directive and they are some of the worst quality waters in the North West (and the country). However, this makes it even more important that opportunities are sought wherever possible to improve the water environment.
- Although a number of policies touch on these issues, a specific policy relating to protecting and enhancing the environment is recommended, e.g. improving water quality; protecting groundwater sources, river restoration and enhancements including de-culverting. This is justified by the requirements of the Water Framework Directive.

Habitats Regulation Assessment

C6: 1 individual response made specific reference to this report, as summarised below;

- Support is given for the explanation of the sites that were considered in the assessment and the chapter on pathways.
- Results of the Screening exercise could be presented more clearly, perhaps in a table format, with a clear explanation detailing the reason each policy has been screened in or out.
- There is quite a long list of policies that have been screened in for Appropriate Assessment, if any likely significant effect can be removed by a simple change in policy wording then this could be presented in the results table and screened out rather than requiring a full Appropriate Assessment.
- It is unclear as to which policies have the potential to affect the integrity of Mersey Estuary SPA and Ramsar.
- Recommendations for amendments to policy in Chapter 5.29 – 5.36 have not been amended in the Core Strategy document, it is vital that the changes are made in order to conclude no likely significant effect.
- It is recommended that the policy wording be changed to include the specific designated site where a likely significant effect has been identified. For example, in chapter 5.35 we would like to see the wording changed to “*Any scheme that would be likely to have a significant effect on any European site including Mersey Estuary SPA and Ramsar, either alone or in combination with other plans or projects...*”

Health Impact Assessment

C7: 1 individual response made specific reference to this report, as summarised below;

- It is encouraging to note that a Health Impact Assessment has been undertaken which concluded that current best practice in relation to health and wellbeing is generally well reflected within the document.
- It is recommended that more work be undertaken to ensure that all the recommendations arising from the Health Impact Assessment are implemented. Some of the most significant of these recommendations are highlighted below;
 - That Health Impact Assessments are routinely undertaken on future development sites where potential negative health impacts have been identified, for example, those within the Green Belt, on flood plains and within areas previously used for mineral extraction.
 - That further work is undertaken to tackle specific issues relating to takeaway food outlets, alcohol licensing, and identifying and providing for the needs of vulnerable communities such as the Gypsy and Traveller Community.

SECTION D: PETITIONS

D1 Green Belt Release at Knowsley Lane, Huyton

53 individual responses

Standard text as follows;

We of (address) are opposed to the review of the Green Belt boundary along Knowsley Lane, Huyton, for housing and employment uses or any development. Concerns: Devaluation of homes, traffic and noise pollution, conservation issues, health and well being of residents, and the local community. (signed) (date)

D2 Green Belt Release at Halsnead Park, Whiston

794 individual signatures

Accompanying text as follows;

We the undersigned, object strongly to any plans for the building of any commercial or residential properties, on land that is between Halsnead Caravan Park and to the rear of Foxshaw Close, Windy Arbor Close, Simons Close and boundaries with the M62 slip road. This land is part of the little left of Green Belt land in Whiston, which has already been eaten into with the new access road from M57 to M62. This Green Belt land is home to lots of different wildlife, that return year on year, also local residents use this land for leisurely walks. We would like Knowsley Council to support our appeals and objections.

D3 Green Belt Release at Land to the east of Halewood

412 individual responses

Accompanying text as follows;

To whom it may concern. I am writing in response to the publication of your Core Strategy Preferred Options report for consultation I am writing to object to the proposal to release Green Belt for housing in the area east of Halewood. The proposals are heavily weighted to presume there is a need to utilise Green Belt land yet there is very little evidence given as to how the figure for the number of dwellings to be built on existing land has been arrived at. How has the capacity for house building on brown and green field sites been arrived at? Why has Green Belt land been identified as suitable for development without a full review of the Merseyside Green Belt boundaries? Why has no mention been made about the risk of flooding in the area and the fact that the flood plain is the reason part of the former Bridgefield Forum site remains undeveloped? Furthermore will these plans be revised when details of the 2011 census are available, which may alter the forecast of population growth significantly? There also appears to be contradictory detail regarding the volume of dwellings needed during the development period. The forecast

of population increase by 2031 is said to be an additional 7 500 and yet elsewhere it is said that a new 10 439 houses will be required to be built, how can there be a need for more houses than the increase in people? Furthermore the proposals draw heavily on the demands laid down by the Regional Spatial Strategy and yet it is acknowledged that the document is in effect redundant with plans by the current government to revoke this strategy when the Localism Bill becomes primary legislation later in the year. The proposals make provision for an additional 1 440 dwellings in the east Halewood area, despite the fact that in your own housing survey Halewood is ranked 5th out of 6 areas in Knowsley where people would want to buy property and it is stated that 100% of double income households would not be able to afford to purchase property based on current prices. Finally the local infrastructure - schools, transport links, public amenities and services and shops - would not be able to cater for this level of increased demand from an extra 1 440 houses in the Halewood area and these plans are therefore fundamentally flawed. In summary I strongly object to your proposal to include areas of Green Belt in Halewood for the building of 1 440 dwellings.

D4 Green Belt Release at Edenhurst Avenue (1)

21 individual signatures

Accompanying text as follows;

Petition to the Leader and Chief Executive of Knowsley Council to keep the playing field between Edenhurst Ave and Sarum Rd in the Green Belt - 4th July 2011 – As a community we need this open space not housing

D5 Green Belt Release at Edenhurst Avenue (2)

37 individual signatures

Accompanying text as follows;

Petition to KMBC to keep Area 4 in the Green Belt – 5th July 2011

D6 Save the Green Belt

95 individual signatures

Accompanying text as follows;

Petition to KMB, Save the Green Belt – No Build – 7th August 2011

SECTION E – RESPONSES DOCUMENTED AT MEETINGS AND CONSULTATION EVENTS

E1.1 Meetings and presenting comments:

- This section summarises the main issues raised during the consultation events undertaken as part of the Preferred Options consultation, as outlined in **Chapter 5**. The events and presentations for which discussions were recorded in the form of detailed notes or minutes were:
 - Halewood Area Partnership Board
 - Halewood Town Council
 - Knowsley Health and Wellbeing Board
 - Knowsley Older People’s Voice Event
 - Knowsley Parish Council
 - North Huyton Area Partnership Board
 - North Kirkby Area Partnership Board
 - Prescott, Whiston, Cronton and Knowsley Village Area Partnership Board
 - South Huyton Area Partnership Board
 - South Kirkby Area Partnership Board
 - Sub-regional Partners Workshop Event
 - Town Centre Committee
 - Whiston Town Council
- This section is sub-divided into broad areas about which representations were received. Some topics and areas of the Preferred Options Report occurred as central topics of discussion more frequently than others, due to the interests of the participating in the discussion sessions. The constituent parts of Section D are as follows:
 - Strategic and Thematic Policy Areas;
 - Housing Issues and Land Supply
 - Employment
 - Green Belt Release
 - Town Centres and Shopping
 - Transport and Infrastructure
 - Green Spaces, Outdoor Sport and Leisure in Knowsley
 - Design, Renewable Energy, Built Environment and Heritage
 - Consultation
 - Area Specific
 - Huyton and Stockbridge Village
 - Kirkby
 - Prescott, Whiston, Cronton and Knowsley Village
 - Halewood

E1.2 Housing issues and land supply

- The need for robust evidence regarding housing growth to support examination of plans was emphasised, given a general perception that such evidence is not always reliable.

- Issue of deliverability of housing land supply was raised as many sites are suitable and available, but may not be deliverable.
- Knowsley's chosen approach of removing an existing RSS backlog was queried in view of scrutiny of other Councils who have adopted such an approach.
- Support was expressed for consideration of backlog as a necessary element of planning for housing growth.
- A potential alternative approach of varying the annual housing target over the plan period was mentioned, e.g. lowering the target in the first few years, and then raising it once the housing market recovers. It was suggested that approaches to this issue are dependent upon housing land supply management, and how a five-year supply would be calculated.
- Emphasis was placed on the importance of recognising that housing targets are figures but not ceilings, and could be exceeded if priorities dictated.
- Concern was expressed with regard to the number of new houses proposed.
- The identification of sites for longer term development needs, beyond the plan period, was queried in terms of whether more sites may be required than those currently identified.
- The need to consider the involvement of the Local Enterprise Partnership (LEP) regarding priorities for housing growth was mentioned.
- A suggestion was made that one of the key advantages of the Overview Study relating to capacity for district housing requirements to be met in other districts, is that this provides evidence that the approach can be discounted.
- Reference was made to a theoretical nominal capacity having been identified in Liverpool and Wirral. However with a caveat that a strong change in market perception would be required for this to work, due to the proportion of flats within the supply, and the reliance upon a small number of schemes to deliver a large amount of development.
- A suggestion was made that a strategy-led approach is most appropriate to address housing need, given the questionable reliability of the use of the SHMA as a theoretical assessment of housing needs.
- Under- and over-occupancy was acknowledged as an issue within Knowsley, with a need to focus delivery of new housing on smaller properties due to a relative dominance of 3-bedroom homes and a shortage of 2- and 4-bedroom homes.
- An issue was raised regarding Knowsley's perception of an ageing population, and that this does not appear to be the case in some areas of Knowsley.
- Strong support was offered for an approach of not forcing people to change houses when they are older or elderly, although it was mentioned that provision of two bed houses and bungalows might provide an incentive for people to down size.
- Reference was made to the need for greater consideration of new types of housing being provided across the Borough, with strong

feelings expressed that more bungalows are required to provide the full range of housing choices.

- One bedroom houses or flats were considered to be not popular, as single people or couples still want sufficient room for guests, e.g. grandchildren, to be able to stay.
- Issues were raised in terms of some houses demolished in Knowsley appearing wasteful as they seemed to be in good condition, with a consequent need for greater consideration of housing renewal.
- Instances of new housing developments were noted which have very low occupancy levels, or are completely vacant. Question asked as to why, if these houses are available for occupation, more houses would be needed.
- Approaches to empty homes were mentioned, with support offered to the strategy due to a vacancy rate of around 3% being considered acceptable to allow for churn in the housing market, together with practical limitations in terms of finance and resources creating difficulties for the Council in bringing a substantial proportion of homes back in to use.
- It was also suggested that bringing vacant properties back in to use cannot count towards meeting housing requirements.
- Knowsley's preferred approach of seeking up to 25% affordable housing was identified as marginally lower than surrounding districts, with consensus that economic viability evidence would be the determining factor in setting policies for affordable housing.
- The possibility of variable site size thresholds for affordable housing policies was queried, with a general consensus that this would be dependent upon available evidence.
- A recommendation was made that a mechanism is required to limit the predominance of buy to rent and its effect on affordability.
- Access by public transport to any housing sites in the Green Belt was identified as a key consideration.
- Design and internal layout of houses was mentioned as a key issue due to the need to ensure convenient usage, with suggestion of community involvement being beneficial at the planning stage.
- Inclusion of solar panels within the design of new housing was encouraged.
- A suggestion was offered that new houses, particularly bungalows or other housing designed for older people, should have grassed garden areas.
- Standards such as Lifetime Homes were considered to be positive, as many issues with existing housing stock are due to limited adaptability.

E1.3 Employment

- The issue of whether districts were planning for a specific mix of B1, B2 and B8 uses was raised, with alternative suggestion of planning for general employment use / economic development, including all of these categories.

- It was mentioned that some neighbouring districts are not seeking to specify how much of each type of development they were seeking to achieve, preferring to identify general employment land supply.
- The issue of deliverability of employment development was raised, as many sites are suitable and available, but may not be deliverable.
- A question was raised as to why additional employment land was required, when there is so much vacancy and derelict land.
- A suggestion was made that vacant premises within the industrial park should be re-occupied as a priority.
- District heating schemes were mentioned with regard to different districts planning to vary approaches due to the preferences of developers.

E1.4 Green Belt release

- Concerns were expressed regarding a lack of a sub-regional approach to Green Belt review, with potential need for an agreed position in the sub-region on key strategic issues recommended with reference to the progression of the LCR Spatial Priorities Plan and alignment with the duty to co-operate.
- Concerns were expressed with regard to the number of new houses proposed and the consequent need for release of Green Belt to accommodate new development.
- Concerns were expressed regarding the strategy for Green Belt release in terms of the impact upon the value of their homes.
- General view was offered that brownfield development should be prioritised over green field or Green Belt development, as it is the most sensible use of valuable land resources
- A suggestion was made that Green Belt development should be avoided, so that the gaps between settlements can be maintained.
- Access issues were raised as a concern for development of Green Belt sites.
- Clarification was requested regarding the ownership of a number of Green Belt sites in the Borough and the consultation process that was undertaken with owners of land which may be designated for review of Green Belt boundaries.

E1.5 Town centres and shopping

- A query was raised as to whether the indicative distribution of floorspace, particularly in Kirkby, is in excess of the current planning approval and more aligned with the Destination Kirkby scheme.
- Retail expansion across all districts was raised as an issue, with a suggestion that it would appear to have a finite limit before negative impacts on some centres in the sub-region will occur.
- A difficulty in the ability to resist development was raised as a concern, if the planned scale of retail development remains aspiration.
- A recommendation was made that the consolidation of existing local shopping parades will assist in reducing vacancy levels that can be a trigger for anti-social behaviour.

- Concerns were expressed about the vibrancy of Huyton town centre, with a suggestion that a wider range of uses in the town centre would assist in making the centre a viable destination to visit.
- A suggestion was offered that Huyton town centre would benefit from a general purpose market open once or twice a week.
- Concerns were expressed regarding the viability of the Prescot town centre.
- A deficiency of local services within Halewood was raised as a concern.
- The issue of car parking charges within Knowsley's town centres was raised, as charging for car parking spaces could discourage people from using town centres, and would therefore have a negative impact on the viability and vibrancy of the centres.
- Concerns were expressed with regard to the proliferation of licensed premises and anti social behaviour within local shopping areas.
- The opportunity presented by the LDF in seeking to reduce the concentrated number of planning applications for takeaway and off licence outlets in certain areas was welcomed.
- A suggestion was made that parking provision for disabled people needs to be improved in the town centres.
- General concerns were expressed regarding the limited control within the planning system relating to changes of retail uses.

E1.6 Transport and infrastructure

- Transport links to rural areas are considered a priority and although bus services are in control of private companies, suggestions were made that some success could be achieved through working together with private operators and partners.
- Travel links to Liverpool from different parts of Knowsley were noted as being good, however problems of accessibility between different areas of Knowsley were raised as an issue.
- Concerns were expressed regarding the poor coverage and punctuality of bus services.
- Suggestions were made that the provision of travel links should be considered at the planning stage of new development.
- Access by public transport to any Green Belt sites was identified as a key consideration for the strategy.
- An observation was offered that transport provision to the new leisure centre in Huyton is currently poor and needs to be improved.
- Support from the strategy for the expansion of Liverpool John Lennon Airport, including the proposed Eastern Access Transport Corridor, was welcomed.
- Consensus of opinion that a preliminary list of sub-regional infrastructure priorities is necessary and should be drawn up to support and inform LDF strategies.
- A suggestion was made that existing school provision and associated community services are inadequate to accommodate the existing population and therefore will struggle to cope with further development.

E1.7 Green spaces, outdoor sport and leisure in Knowsley

- A suggestion was made that there is a need for more youth centres and other provision for young people.
- Concerns were expressed regarding the potential loss of playing fields in Green Belt areas.

E1.8 Design, renewable energy, built environment and heritage

- The importance of taking into the account the needs of elderly and disabled residents in terms of the design of new build properties was emphasised.
- Concerns were expressed about land contamination, gas migration and previous coal mining activity, which could affect the viability of redeveloping areas of previously developed land within Knowsley.
- There was a general agreement regarding the need to consider the ability to adopt designs that will discourage crime and help people feel safer.
- Support was expressed for the consideration of energy efficiency in the design of new development and the approach of encouraging low carbon developments, incorporating renewable technologies.

E1.9 Consultation

- Negative feedback was offered regarding the consultation booklets for the LDF being not completely clear in terms of precisely what was being proposed.
- A concern was expressed that the layout of the consultation leaflet and in particular the township-level maps were not clear, with a suggestion that additional roads should be included (e.g. A roads) to give a greater spatial context and to help identify specific locations.
- It was recommended that the Council needs to continue to engage with local groups in continuing to develop future strategies.

E1.10 Huyton and Stockbridge Village

- Concerns were expressed about development activity within the Bluebell Lane Estate in Huyton, as residents would prefer children's play areas to the cycle ways recently provided and there is a need for a new activity centre or similar.
- Questions were raised as to whether the areas of housing demolition in the Page Moss area were to make way for a link road to the M57.
- Concerns were expressed regarding land contamination and access relating to Thingwall Hall.
- A suggestion was offered that a number of areas of open land in North Huyton as a result of demolition programmes are unused and therefore should be the first priority for redevelopment.
- Concerns were expressed with respect to the potential for housing development at Edenhurst Avenue and the lack of response from the owner of the land in dealing with anti-social behaviour.

E1.11 Kirkby

- Concerns were expressed by neighbouring districts regarding retail expansion of Kirkby town centre. Although if the retail expansion is to be limited to the existing planning permission, it was suggested that there are no short-term concerns.
- The need for additional employment land being required within the Green Belt near to Knowsley Industrial Park was questioned, given the extent of vacancy and derelict land in that locality.
- It was suggested that vacant employment properties and sites in Knowsley Industrial Park need to be prioritised for development in the early stages of the plan.
- A query was raised in terms of whether any neighbouring Local Authority's LDF's would have an impact on the Kirkby area.

E1.12 Prescott, Whiston, Cronton and Knowsley Village

- Positive experiences of working with the Council and its partners was reported, with specific reference to the redesign of the Prescott One Stop Shop building, where the community advice service was consulted about how the facility should be designed.
- The issue of the viability of the Eccleston Street shopping area in Prescott was mentioned. Concerns were also expressed regarding the influence of Tesco over the town centre in this context.
- Concerns were expressed about what would happen to the residents of Halsnead Park in Whiston, and how the site will be access should the proposed residential development within the Green Belt in this location proceed.
- Concerns were expressed regarding the ability to access Whiston cemetery by bus.
- Knowsley Village was identified as being particularly isolated from public transport links.
- Concerns were expressed regarding land contamination at Cronton Colliery and Carr Lane, offering a real challenge to the successful redevelopment of the site for another purpose.
- Concerns were expressed regarding potential subsidence associated to previous coal extraction in Prescott and Whiston.

E1.13 Halewood

- The absence of progress on the development of the new Raven Court centre in Halewood was queried with dissatisfaction expressed noting the length of time that the local population has suffered from a lack of local services.
- A suggestion was offered that Green Belt development should be avoided in this area, so that the gaps between Halewood and Widnes can be maintained.
- Concerns were expressed regarding the potential identification of greenfield land within Halewood for housing development, given a substantial proportion is within a local flood plain.

7 Lessons Learnt

7.1 Consultation successes

- 7.1.1 Having concluded the Preferred Options consultation, it is possible to identify particularly successful aspects of the consultation methodology, which yielded positive results for the Council in terms of quality and quantity of feedback.
- 7.1.2 **Roadshow events:** Roadshow events in each of the township areas were extremely well attended and resulted in a good level of engagement with members of the public. This was due on the main to the location of the road show stands in the centre of Kirkby, Halewood, Huyton and Prescot, which led to a high level of footfall of people passing the stands. In addition, the fact that the events were advertised within the Summary Leaflet, which had been posted to all households, meant that some stakeholders made a particular effort to attend the roadshow events in order to gain further insight to the consultation, and to engage in discussions with Council officers. The events also afforded the opportunity for officers to circulate additional copies of leaflets, including to those who had mislaid their posted copy, and to non-residents of the Borough (e.g. those shopping in town centres). These events represented a significant improvement on roadshow events held to support the Issues and Options consultation, both in terms of the number of attendees and also in terms of the quality of discussion held with local stakeholders.
- 7.1.3 **Presentations:** Council officers gave presentations to an extremely wide range of stakeholder groups during the consultation period. These served to publicise the consultation, explain in more detail the content of the Preferred Options Report, and also assisted in engaging in debate with various professionals, members of interest groups and local people. These resulted in various written consultation responses being received, and also in passing the message of the consultation to a wider number of people, who in turn shared materials with their contacts. Particular successes included presentations to Parish and Town Councils, to Area Partnership Boards, to thematic local partnerships e.g. housing, and also to the Knowsley Older People's Voice group.
- 7.1.4 **Letters and emails:** In response to a variety of public consultation methods, notably the emails and letters sent by the Council to members of the LDF consultation database, many detailed letters and emails were received. This included correspondence from many respondents who had considered the range of materials published as part of the Preferred Options consultation, including the full report and various supporting documents, such as the draft Knowsley and Sefton Green Belt study. This led to the highly detailed comments received and summarised in Chapter 6, Section B of this report. The quality of these comments, including the detailed planning-related arguments

contained therein, represent a very useful resource for the development of the subsequent stage of the Knowsley Core Strategy, namely the Proposed Submission Version, and its supporting evidence base and assessments.

7.2 Consultation shortcomings and proposed Improvements

7.2.1 In addition to those aspects of the Preferred Options consultation which were deemed to be successful, there were some actions and activities which could be improved upon. These were identified either through suggestions from the public and other parties about how the consultation could be better run, or identified by the Council in terms of poor responses or attendance from particular events or activities.

7.2.1 A number of residents informed Council officers that they had not received a **Summary Leaflet** to their home, as planned as part of the Preferred Options consultation. Following similar issues at the Issues and Options stage, the Council has proactively procured what it considered to be the most reliable delivery method for distributing summary leaflets, namely the Royal Mail. The Council received assurances as part of this procurement that all Knowsley households would receive a leaflet. Unfortunately, errors can occur and the Council apologised to those who did not receive a leaflet. However, leaflets were made available in other public buildings, and were also available on request from Council officers.

7.2.2 During the consultation, suggestions were received from members of the public regarding the ways in which the consultation process could be improved. Such suggestions included:

- Ensuring that all residents received a Summary Leaflet
- Making maps more details in order that specific locations could be identified
- Making materials simpler and easier to understand for local people
- Provision of additional locally-based roadshow events, both increasing the frequency of events and also the number of locations covered
- Ensuring that residents within neighbouring authorities who may be affected by proposals also receive Summary Leaflets and details about the consultation.

7.2.3 Officers will give due consideration to these suggestions in planning the next consultation for the Core Strategy, and will continue to develop the Local Development Framework consultation methodology to ensure that future consultations are more wide-ranging and inclusive. Equally, officers will consider the less successful elements of the Preferred Options consultation, and seek to reduce the scope of these elements for subsequent consultations, hence using resources more efficiently and seeking to consult interested parties more effectively. However, it is worth noting that the next stage of consultation on the Core Strategy

will be a more technical consultation relating only to specific issues of soundness and legal requirements. This will require a slightly different approach from the Council, as explained in more detail in the next Chapter.

8 Next Steps

8.1 Presenting this report

- 8.1.1 Efforts have been made to ensure that where specific groups and parties who had contributed to the consultation process have been made aware of the findings and main issues raised. This included the following:
- Acknowledgement of all written responses (not including petitions) and notification of the Council's intention to produce a Report of Consultation
 - Presentation of Preferred Options – Report of Consultation to Council members via Cabinet
 - Publication of this Preferred Options – Report of Consultation on the Council website for public access
 - Publication of the main issues raised in this report within documentation, at subsequent stages of Core Strategy preparation and as part of the final Report of Consultation published at the Submission stage of the Core Strategy.

8.2 Using the Preferred Options consultation results

- 8.2.1 The Preferred Options consultation results will be an important component in the development of the **Proposed Submission Version Core Strategy**, the next stage of the preparation of the Core Strategy. The information collected, including especially the main points raised as described earlier, will influence the finalisation of the policies which the Council will draft within this final version of the Core Strategy.
- 8.2.2 Wherever possible, the Council will seek to account for the views of the community in the development of the Core Strategy, and the wider Local Development Framework. The Council has a responsibility at this stage, in accordance with Planning Policy Statement 12 and the relevant legislation and regulations, to ensure that the main issues raised during consultation periods are published alongside subsequent stages of consultation, demonstrating that representations received have been dealt with in the appropriate manner, and as appropriate, have been fed into the development plan process.
- 8.2.3 However, it is important to note that not all of the points raised within the Preferred Options consultation can or will be accommodated within the Proposed Submission Version Core Strategy, for the following reasons:
- Contradictory messages cannot all be taken into account (e.g. where two parties say opposing things about a particular issue or option); a balanced view will need to be reached
 - Some points raised are contrary to national and regional planning policy – the Council cannot usually take these forward, particularly

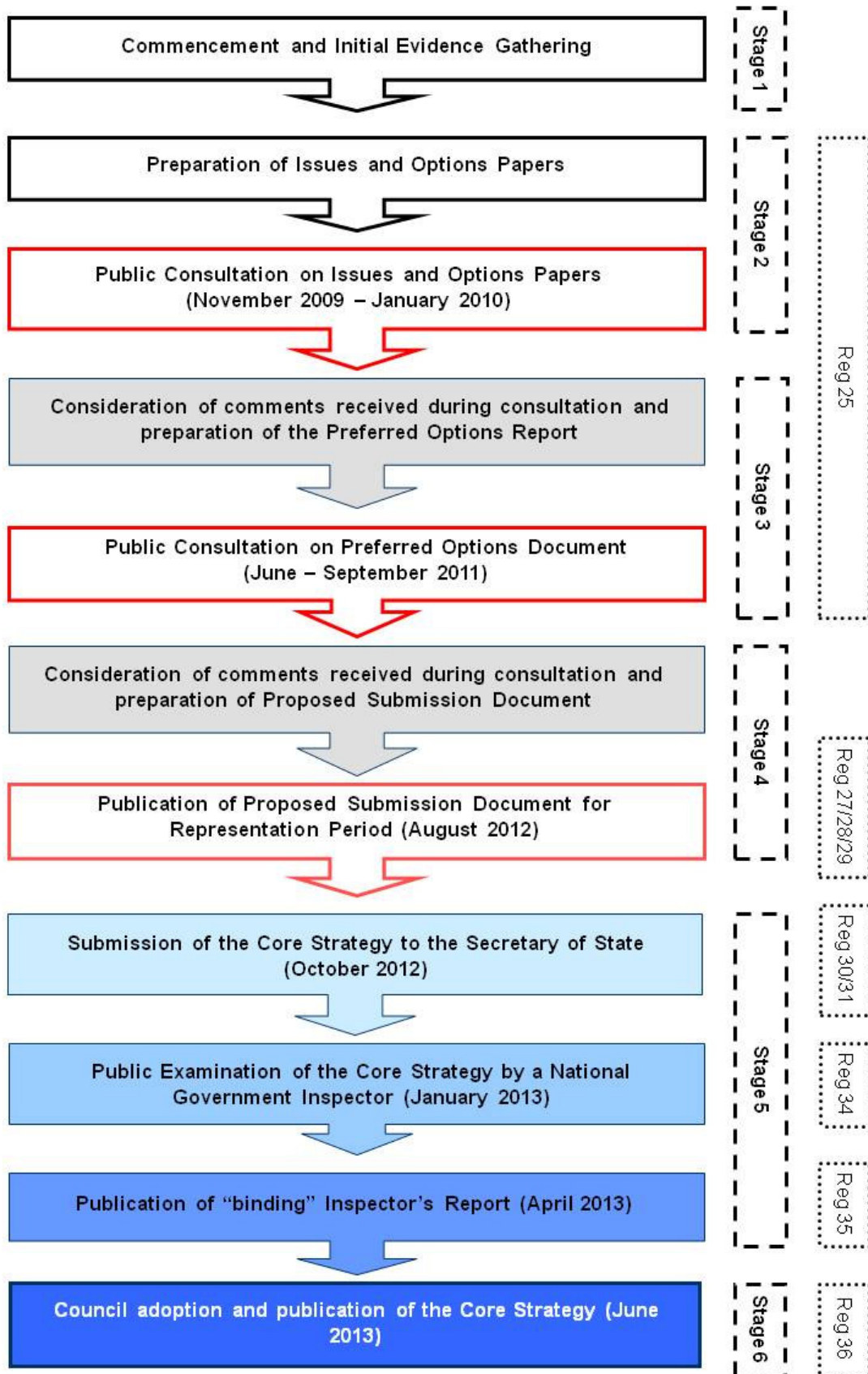
where there is a direct contradiction with advice issued by Government

- The planning policy framework within which the Core Strategy is being drafted may change, for example with the publication of new national, regional or sub-regional policy documentation, meaning that certain aspects of the Local Development Framework will need to be changed in accordance with this
- Content may necessarily change, or not be included, due to emerging evidence or information which the Council will continue to collect to support subsequent stages of plan preparation, for example, new studies and research documents

8.3 Preparing the Proposed Submission Version Core Strategy and subsequent consultation

8.3.1 **Figure 8** shows the phases in Core Strategy preparation, showing how the document will progress beyond the Preferred Options consultation. **Figure 8** also includes dates for the major events in preparation of the Core Strategy, including periods of public consultation. As indicated, the next stage of Core Strategy preparation after the public consultation on the Preferred Options Report is the consideration of comments received during the consultation, and the preparation of the Proposed Submission Version of the Core Strategy. This document will demonstrate the evolution of the Preferred Options Report, in the light of the consultation and in the light of any newly emerging evidence, into a series of final policies for the development of Knowsley to 2027, which will form the Core Strategy.

Figure 8: Main stages of Knowsley’s Core Strategy preparation (dates subject to review)



- 8.3.2 Once drafted, the Proposed Submission Version will then be published for a period of consultation during Summer 2012. This is a critical stage in the preparation of the Core Strategy, it being the final opportunity for stakeholders to comment on the strategy. It is important to note that the comments at this stage will be severely restricted, in line with the Regulations, to issues of legal compliance and soundness only. PPS12 contains more details of this process. The Proposed Submission Version is the plan which the Council considers to be sound and which it will then submit to the Secretary of State for consideration through an examination in public.
- 8.3.3 A final consultation report will be published subsequent to this process of consultation. This will include all of the detailed responses relating to legal requirements and soundness issues, which will in turn be considered as part of the Examination in Public. The Council will also make available previous Reports of Consultation, and in addition an explanation of the wider process of developing the Core Strategy to its final version, accounting for policy drafting and decision making apart from that related to consultation, for example that relating to emerging evidence, or regional policy development. This should also clearly demonstrate how the Core Strategy has been prepared within the appropriate legislative and policy context, showing legal conformity with the Local Development Framework process prescribed in national planning policy, legislation and regulations. Overall, these documents together will demonstrate a clear path of policy development, from the earliest initial stages of Core Strategy preparation and research, towards the final version which will be submitted to the Secretary of State.

8.4 Continued consultation

- 8.4.1 In addition to the formal stages of consultation outlined in Section 8.3 and Figure 8, there is also an intention to continue informal consultation activities. These are valuable as they permit engagement with stakeholders outside of the formal public consultation structures, with outcomes from discussions helping to form the evidence base which will support the final Core Strategy.
- 8.4.2 Examples of this continuous consultation include engagement with stakeholders such as statutory agencies and sub-regional organisations, communication and joint working with neighbouring authorities, and engagement exercises with hard-to-reach groups, who may not have responded well to the formal consultation stages (e.g. Knowsley youth organisations). In addition, Council officers continue to meet with landowners and developers of key sites within the Borough, including those within the urban area, and those raised as potential Green Belt releases as a result of the Preferred Options consultation. These meetings in particular are valuable in providing contextual information to support the evidence base collation around land supply issues.

9 Glossary

Acronym	Meaning	Definition
APB	Area Partnership Board	Partnerships operating across particular areas of Knowsley seeking to promote the interests of the area, improve quality of life and to make sure that area needs are reflected in the design and delivery of local services.
BREEAM	Building Research Establishment Environmental Assessment Method	A family of assessment methods and tools used to assess the environmental performance of any type of building (new and existing).
BSF	Building Schools for the Future	The national initiative for large scale investment in secondary schools, implemented by the local authority.
CIL	Community Infrastructure Levy	A levy on development proposed by the government and to be implemented by local authorities, to fund infrastructure to support housing and economic growth.
CLG	Communities and Local Government	The government department which sets policy on local government, housing, urban regeneration, planning and fire and rescue.
CS	Core Strategy	The central Development Plan Document (DPD) within the Knowsley Local Development Framework. The term "CS" is also used as a reference for the different preferred policy approaches outlined in the Preferred Options Report, i.e. CS1, CS2, etc.
DPD	Development Plan Document	Part of the Local Development Framework, including Core Strategy DPDs, Development Management DPDs and Area Action Plan DPDs. These form part of the statutory development plan for their area.
ELPS	Employment Land and Premises Study	Research study commission by Halton, Knowsley, Sefton and West Lancashire districts to look at the supply and demand for land and premises for business purposes.

HCA	Homes and Communities Agency	The national housing and regeneration agency, providing funding for affordable housing, bring land back into productive use and improve quality of life by raising standards for the physical and social environment.
HRA	Habitats Regulation Assessment	An assessment of the potential effects of a policy contained within a plan or programme on one or more sites designated as important at the European Level, namely Special Protection Areas and Special Areas of Conservation.
GONW	Government Office for the North West	The regional offices of national government which works with organisations across the Region to deliver Government policies and programmes and to contribute a regional perspective in their development.
I&O	Issues and Options	The first formal stage of preparation of a Development Plan Document (DPD).
KMBC	Knowsley Metropolitan Borough Council	The local authority for the Knowsley area.
KIP	Knowsley Industrial Park	The large industrial area found to the east of Kirkby town centre, towards the northern part of Knowsley's area.
LAA	Local Area Agreement	A three year agreement, based on the local Sustainable Community Strategy that sets out the priorities for a local area agreed between Central Government and a local authority plus other key partners such as the Local Strategic Partnership.
LCR	Liverpool City Region	The collective term for the local authorities of Halton, Liverpool, Knowsley, Sefton, St.Helens and Wirral.
LDD	Local Development Document	Documents within the Local Development Framework.
LDF	Local Development Framework	The portfolio of Local Development Documents including Development Plan

		Documents, Supplementary Planning Documents and process documents, including the Statement of Community Involvement, Local Development Scheme and the Annual Monitoring Report. This also includes the Saved Policies of Unitary Development Plans.
LDS	Local Development Scheme	Sets the timetable for the production of the Local Development Framework and its constituent documents, and provides details of all of the Local Development Documents to be produced.
LEP	Local Enterprise Partnership	A statutory body which comprises a collective of private and public organisations, intended to provide strategic leadership and a focus for economic development across the sub-region. Liverpool City Region LEP includes Knowsley.
LSP	Local Strategic Partnership	A non-statutory body that brings together the different public, private, voluntary and community sectors, working at a local level. The lead member in the Partnership is the Council, with other members including the Primary Care Trust and the Police.
LTP	Local Transport Plan	Sets out the Council's objectives, strategies and policies for transport, detailing the schemes and initiatives that will be delivered, together with the performance indicators and targets used to monitor progress.
MAA	Multi Area Agreement	A type of cross-boundary Local Area Agreement, this strengthens partnerships across a wider spatial area than a local authority, for example across a sub-region and offer opportunities for more meaningful joint working and more efficient leveraging of funding.
MEAS	Merseyside Environmental Advisory Service	The retained advisors for the Liverpool City Region local authorities on environmental matters. The organisation is also preparing the Joint Waste Development Plan Document on behalf of

the local authorities.

MPG / MPS	Minerals Planning Guidance / Minerals Policy Statement	Sets out the Government's policy on minerals and planning issues and provide advice and guidance to local authorities and the minerals industry on policies and the operation of the planning system with regard to minerals.
MSA	Minerals Safeguarding Area	Areas that may be identified by local authorities of areas of particular importance for the safeguarding of mineral reserves.
NPPF	(draft) National Planning Policy Framework	The proposed new format for national planning policy in England. The draft NPPF is currently being consulted on, and will eventually replace existing Planning Policy Guidance and Planning Policy Statements.
NWDA	North West (Regional) Development Agency	A non-departmental public body established for the purpose of development, primarily economic. The objectives of the organisation are set out in the Regional Economic Strategy.
OSS	One Stop Shop	The local Council drop-in facility where services are available for public use and advice is available from Council officers.
PCT	Primary Care Trust	A local National Health Service organisation providing primary and community services or commissioning them from other providers, also involved in commissioning secondary care.
PO	Preferred Options	The second formal stage of preparation of a Development Plan Document (DPD).
PPG	Planning Policy Guidance	Central Government statements of national planning policy and guidance. They are being superseded by Planning Policy Statements.
PPS	Planning Policy Statement	Prepared by Central Government as statements of national planning policy and provide guidance to local planning authorities and others on planning policy and the operation of the planning system.

RES	Regional Economic Strategy	Prepared by the Regional Development Agency to outline the region's economic plans, with frameworks for regional, sub-regional and local action, and relying on public and private partners for delivery.
RSL	Registered Social Landlord	Including Housing Associations and Councils, these are independent not-for-profit organisations providing low cost "social housing" for those in housing need and are the UK's major provider of homes for rent, as well as providing opportunities for shared ownership.
RSS	Regional Spatial Strategy	The set of regional planning policies providing the principles of development in the region. Regional Spatial Strategy policies form part of the "development plan" at the local level, meaning they are a direct material consideration in the determination of planning applications. The government intends to abolish all RSS documents within the Localism Bill in 2012.
SA	Sustainability Appraisal	The process appraising the social, environmental and economic effects of the policies contained within Local Development Documents including all Development Plan Documents and where appropriate, Supplementary Planning Documents. Includes requirements for Strategic Environmental Assessment (SEA).
SCI	Statement of Community Involvement	Sets out the role that the community and other stakeholders will play in the production of all documents within the Local Development Framework, as well as their role concerning planning applications.
SCS	Sustainable Community Strategy	Also known as the Community Strategy, this provides an overarching framework through which the corporate, strategic and operational plans of the partners within a Local Strategic Partnership can contribute. This must contain a vision for the area and

an action plan, as well as evidence of a shared commitment to implementation and arrangements for monitoring, review and reports of progress.

SFRA	Strategic Flood Risk Assessment	These are primarily produced by local planning authorities, in consultation with the Environment Agency, and are intended to form the basis for preparing appropriate policies for flood risk management at the local level.
SHLAA	Strategic Housing Land Availability Assessment	A systematic assessment of the land developable and deliverable for housing within an area. The assessment includes a 'Call for Sites' where the public can promote sites as being suitable for housing development and appraisal of deliverability by a panel of developers and Registered Social Landlords active in the local market.
SHMA	Strategic Housing Market Assessment	A study across an identified largely 'self contained' housing market to provide understanding how the market operates and is likely to operate in the future. This provides an assessment of past, current and future trends in housing type and tenure, household size, and housing need, including an assessment of the needs of groups with particular housing requirements. In the preparation of the document, a consistent sub-regional approach is important, as is the involvement of key stakeholders in the local housing market.
SPD	Supplementary Planning Document	Part of the Local Development Framework these provide supplementary information in respect of the policies contained in Development Plan Documents, and tend to focus on particular issues or on particular places. They do not form part of the Development Plan and are not subject to an independent examination.
(R)UDP	(Replacement) Unitary Development Plan	A development plan prepared under the pre-2004 system by a Metropolitan district or Unitary Local Authority, which contains policies equivalent to those in both a

structure plan and local plan, forming the part of the authority's statutory development plan. Policies from which are saved for an initial 3 year, or indeterminate period by consent of the Secretary of State and form part of the Development Plan for an area until superseded or otherwise deleted by a Development Plan Document.

APPENDICES

Appendix A: Statement of Compliance with the Statement of Community Involvement

Appendix B: Cabinet Agenda, Agenda Pack and Minutes

Appendix C: Publicity Materials

Appendix D: Standard Preferred Options Presentation

Appendix E: Full List of Respondents

Appendix F: Web Link to Report of Consultation (Objective)

Appendix A: Statement of Compliance with the Statement of Community Involvement

1 INTRODUCTION

- 1.1 This appendix to the Preferred Options: Report of Consultation for the Knowsley Core Strategy sets out in clear terms how the consultation processes undertaken are in compliance with the Council's adopted Statement of Community Involvement. The Council adopted its Statement of Community Involvement in May 2007.
- 1.2 The Statement of Community Involvement can be viewed on the Council's website using the following link:
<http://www.knowsley.gov.uk/residents/building-and-planning/planning/local-development-framework/emerging-development-framework/community-involvement.aspx>
- 1.3 As the Preferred Options consultation for the Core Strategy is essentially the second consultation on a Development Plan Document (DPD), it is appropriate to consider the sections of the Statement of Community Involvement which explain how the Council is going to involve the community in such a DPD consultation. Hence, the relevant sections of the Statement of Community Involvement for the purposes of this Appendix are:
- **Chapter 6: Stakeholders and methods of involvement**
 - **Chapter 7: Development Plan Documents**
 - **Chapter 10: Resources and monitoring**
 - **Appendix 1: List of potential consultees for the Local Development Framework**
 - **Appendix 2: Methods of engagement**
- 1.4 The following sections detail how each of these sections have been accounted for within the Preferred Options consultation. This includes, where appropriate, reproducing sections of the Statement of Community Involvement, and highlighting against these sections how the Preferred Options consultation has met the requirements outlined. For example, this may include a list of consultation methods contained within a table, which has been amended for the purposes of this appendix to explain how methods have been used specifically for this consultation.

2. CHAPTER 6: STAKEHOLDERS AND METHODS OF INVOLVEMENT

- 2.1 This chapter of the Statement of the Community Involvement sets out how the Council intends to engage with "hard to reach" groups, that is those who often find it difficult to get involved in planning matters. Table 6.1 outlines the potential measures to be employed by the Council to engage these groups. While Chapter 6 (paragraph 6.5) states that it may not be practical to institute all of the actions suggested in all

consultations, as a guiding principle the more major the policy or proposal, the more extensively the actions will be applied. The below section replicates Table 6.1 and then explains how the methods suggested have been employed within the Preferred Options consultation.

Excerpt from Statement of Community Involvement (KMBC, May 2007)

Table 6.1 Potential measures to engage hard to reach groups (amended)

Reason hard to reach	Actions to be considered	Actions undertaken through the Preferred Options Consultation
<p>Not interested. Or don't respond to traditional forms of communication.</p>	<p>Use the web creatively by posting interesting articles and pictures.</p> <p>Explore the use of innovative technologies like digital television and video presentations.</p> <p>Link with youth forums, Knowsley Schools Council. For documents that relate to young people prepare reports that highlight the key issues.</p>	<p>Full use of the Knowsley Council internet website and intranet. Use of Facebook and Twitter sites to promote consultation.</p> <p>Capturing consultation events digitally through photography.</p> <p>Presentation to SPARK youth group highlighting key issues for young people. Links with Youth Parliament (Shout for Knowsley) Facebook site.</p>
<p>Groups whose interests may not be well represented in the community.</p>	<p>Use partnership boards and public forums to reach wider cross sections of the community.</p> <p>Connect with theme based groups to target those that are hard to reach.</p>	<p>Presentations for Area Partnership Boards. Presentations to Town and Parish Councils. Presentations for minority groups such as Knowsley Older People's Voice. Where appropriate, presentations and workshops were tailored to the interests of the audience.</p>
<p>Accessibility barriers, including:</p> <ul style="list-style-type: none"> • People who are housebound or less mobile. • Those who would not normally go to Council offices. • People with health or 	<p>Take road shows and displays to local shops, community centres and areas that are most used by people during the day.</p> <p>Explore the possibility of giving information to home helps or neighbourhood wardens who have daily contact with those that are considered hard to reach.</p>	<p>Extensive use of road show drop-in events in town centres.</p> <p>Full email consultation to consultees on the LDF database. Full email consultation to businesses.</p> <p>Posting of leaflets to individual households, helping to reach those unable to attend events, as well as advertisements and articles in the local press. Responses to the questions posed within leaflets could be returned via Freepost,</p>

<p>mobility issues that are limiting.</p> <ul style="list-style-type: none"> • Those with learning difficulties • Transient populations 	<p>Use email, postal and phone consultation.</p> <p>Consult with community groups on how best to communicate with those that have issues of accessibility.</p> <p>Make documents available in large print or Braille on request.</p>	<p>hence limiting the cost of the consultation for participants.</p> <p>Ability to make documents available in large print, Braille and audio versions on request.</p>
<p>Literacy issues</p>	<p>Use plain language and avoid abbreviations.</p> <p>Produce non-technical summaries for all major documents.</p> <p>Where possible produce short easy to understand leaflets and brochures.</p> <p>Make documents available in other languages when requested.</p>	<p>Inclusion of a full glossary and explanation of acronyms used in the Preferred Options documentation.</p> <p>Production of summary leaflets explaining in simple terms the strategic options within the Preferred Options Paper.</p> <p>Ability to make documents available in other languages on request.</p>

2.2 The above table demonstrates that as part of the Preferred Options consultation, many of the “actions to be considered” to reach hard to engage groups, as set out in the Statement of Community Involvement, have been achieved. The range of activities undertaken is considered to be satisfactory for the Preferred Options stage, with the majority of suggested actions being undertaken.

3. CHAPTER 7: DEVELOPMENT PLAN DOCUMENTS

3.1 Chapter 7 of the Statement of Community Involvement sets out the different stages of preparation of a DPD such as the Core Strategy, and outlines how the Council intends to involve people at each stage, illustrating the level of involvement expected and the methods that will be used. Within this chapter, Table 7.1 illustrates the proposed methods of engagement to be employed at each of the stages of DPD production, including specific requirements for the Preferred Options stage of DPD consultation. The below excerpt from the Statement of

Community Involvement reproduces the relevant part of Table 7.1, and the subsequent text explains how the Preferred Options consultation for the Core Strategy has met the requirements set out within the table.

Excerpt from Statement of Community Involvement (KMBC, May 2007)

Table 7.1: Proposed methods of engagement - Development plan documents

Stage of preparation	Methods (see Appendix 2)	Groups to be consulted
Prepare and publish issues and alternative options Regulation 25 Sustainability appraisal scoping report produced at this stage	Website Email or Letter Stakeholder meetings Documents at council offices and libraries Leaflets* Press article* Questionnaire/survey* Knowsley news*	Those who commented earlier; Specific consultees, General consultees and Other consultees

1. Methods in black without a * will be used for all DPD's

2. One or more of the methods in red with * should be used for Development Plan Documents and two or more for the Core Strategy. Other methods with an equivalent level of impact may also be used.

3. The regulations referred to in this table are set out in The Town and Country Planning (Local Development) (England) Regulations 2004. They can be viewed at the Department for Communities and Local Government website, see Appendix 4.

3.2 Stage of preparation

- **Prepare and publish issue and alternative options – Regulation 25**

The Core Strategy Preferred Options Report was published on 27th June 2011 for a ten week period of consultation, until 5th September 2011. The Preferred Options Report was published as the second formal stage of consultation of the Knowsley Core Strategy, under Regulation 25 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

Since the publication of the Statement of Community Involvement, changes have been made to the regulations under which a DPD is prepared. However, for the purposes of the Preferred Options consultation, there are no practical implications for this change, as the document is still published under Regulation 25.

- **Sustainability Appraisal**

In order to ensure that new plans and strategies contribute towards the sustainable development, the Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal to be carried out on all new or revised Development Plan Documents. In addition, local planning authorities must comply with European Union Directive 2001/42/EC, which requires a formal Strategic Environmental Assessment (SEA) of plans and programmes that are likely to have a significant effect on the environment.

The publication of the Preferred Options Report was accompanied by sustainability appraisal reports. These were as follows:

- Interim Sustainability Appraisal (Issues and Options): this document considers the potential implications of the Core Strategy by assessing the Strategic Spatial Options, Scale of Future Growth and Development Options and Township Priorities against available baseline data and sustainability objectives (as set out within the Scoping Report).
- Interim Sustainability Appraisal (Preferred Options): this document considered the potential implications of the Core Strategy by assessing the spatial strategy and range of preferred policy options proposed within the Preferred Options Report.

3.3 Methods

As indicated in the excerpt from Table 7.1 reproduced above, Appendix 2 of the Statement of Community Involvement explains the methods to be used during consultation on different stages of preparation of a DPD. Hence, to explain how these have been employed during the Issues and Options consultation, sections of Appendix 2 are reproduced below.

The relevant sections of Appendix 2 have been used to structure the explanation of how the requirements of Table 7.1 have been taken into account, under the following sections:

- **Website**
- **Email or Letter**
- **Stakeholder meetings**
- **Documents at council offices and libraries**
- **Leaflets**
- **Press article**
- **Questionnaire/survey**
- **Knowsley news**

Where methods have been employed during the Preferred Options consultation, which represent extra methods over the minimum

required for this stage of DPD production, these have been included in the below sections (marked by *italics*).

3.4 Website

Consultation / involvement method	Role	Resource requirements	Action to be taken	Actions undertaken through the Preferred Options consultation
<p>Council Website. Place documents and questionnaires for consultation on the web.</p>	<p>Capability to inform and engage a wide range of people relatively easily. Can reach groups who use the internet who can be hard to reach such as young people and the elderly.</p>	<p>Low In house resources are already in place to facilitate this.</p>	<p>Web site to be up dated to increase user friendliness. Provide clear links to relevant documents and add contact details.</p>	<p>Website updated with all evidence base materials, consultation materials, full Preferred Options report and supporting materials, including Sustainability Appraisal. Use of “Objective” software to enable comments on summary leaflet and full document to be submitted online. Contact details and FAQs sections also included.</p> <p>Use of Council’s intranet site to advertise consultation internally.</p> <p>Use of Facebook and Twitter sites, including links with other Knowsley groups.</p>
<p><i>Other electronic forms of consultation</i></p>	<p><i>Digital television, video presentations on and off line, and mobile text messaging are new and innovative ways</i></p>	<p>High <i>As these forms of communication are new set up costs can be</i></p>	<p><i>The first stage of developing digital TV use has begun. SMS text messaging is a difficult area to use for planning and will</i></p>	<p><i>Collation of digital material including photographs of consultation events.</i></p> <p><i>Use of innovative web-based consultation methods including Facebook Group and Twitter web</i></p>

	<i>of communication the Council is exploring the use of.</i>	<i>prohibitive.</i>	<i>require further consideration in the future. The use of video may be appropriate for consultation on large proposals or the core strategy.</i>	<i>updates.</i>
--	--	---------------------	---	-----------------

3.5 Email or Letter

Consultation / involvement method	Role	Resource requirements	Action to be taken	Actions undertaken through the Preferred Options consultation
Email	Can be used; to send electronic versions of documents increasing the amount of people that can get a copy, to inform or request input into document preparation.	Low A quick and easy way of consulting people.	The consultation database should be updated regularly with people’s emails, read receipts should be used to make sure emails are reaching who they are intended for.	Email correspondence sent to all consultees on the LDF consultation database. Email sent to business contacts. Where emails were undeliverable, contacts were chased by telephone and email addresses updated.
Formal letters	Where email is not available or where requested letters are a way of formally	Medium This can be time consuming but	The consultation database has been established and is currently being	Letters sent to specific consultation bodies, along with a paper copy of the Preferred Options Report.

Consultation / involvement method	Role	Resource requirements	Action to be taken	Actions undertaken through the Preferred Options consultation
	<p>contacting those that will be directly impacted by a decision or have responded to a consultation. Through the consultation database responses can be tracked and letters sent when required.</p>	<p>in house resources are available to do this.</p>	<p>populated. Users will be able to make their comments electronically.</p>	<p>Letters sent to all Council elected members, along with a formal information pack containing all relevant consultation documents.</p>
<p><i>Documents sent to selected organisations and individuals.</i></p>	<p><i>Hard copies may be sent to statutory consultees and neighbouring authorities. When requested documents may be sent in hard copy but preferably they will be sent on CD or electronically.</i></p>	<p>Medium <i>Sending documents via hard copy is not viable on a large scale due to copying and postage costs. Electronic and CD versions are the preferred method of</i></p>	<p><i>Contact all local authorities and Statutory consultees, those we are required to consult or usually would consult, and ask them how they prefer to receive documents.</i></p>	<p><i>Specific consultation bodies received a paper copy of the Preferred Options Report.</i></p> <p><i>Efforts were made to highlight the availability of information online via the Council's website in all correspondence.</i></p>

Consultation / involvement method	Role	Resource requirements	Action to be taken	Actions undertaken through the Preferred Options consultation
		<i>forwarding documents.</i>		

3.6 Stakeholder meetings

Consultation / involvement method	Role	Resource requirements	Action to be taken	Actions undertaken through the Preferred Options consultation
Stakeholder meetings	These may be informal discussions to gain advice and input, a series of formal minuted meetings, or presentations with questions and answer sessions.	Low Meetings with stakeholders are a good low cost way of consultation.	Identify stakeholders early for each document so meetings can be arranged and all stakeholders included.	Presentations were given to the following: 4 Area Partnership Boards (North and South Huyton, North and South Kirkby, Halewood and PWCKV) 5 KMBC Elected Members 6 Town Councils (Whiston, Cronton, Halewood, Knowsley) 7 Partnership Meetings (Local Strategic Partnership, Health and Well-being) 8 Town Centre Committee 9 Sub-regional Partners (Local Authorities and agencies) 10 Other Stakeholders (SPARK youth

				group, Older People’s Voice) 11 Council internal working groups
<i>Local Public Forums</i>	<i>These are ongoing meetings with the community to discuss community issues. Area Partnership Boards meet on a regular basis while public forums meet less frequently but are open to all.</i>	Low <i>Public forum should provide a good way of reaching the community.</i>	<i>Public forums are good for consulting on area specific plans and the appropriate forum should be consulted on documents that impact on their area.</i>	<i>Presentations and workshops were given for all Area Partnership Boards (North and South Huyton, North and South Kirkby, Halewood and PWCKV). Information was circulated by attendees of these meetings to their respective organisations.</i>
<i>Exhibitions, displays and road shows.</i>	<i>These offer a way of publicising planning issues by engaging directly with the public. They can target certain geographical areas and be placed in popular shopping or community areas where a high number of people can be reached.</i>	High <i>These methods are resource intensive. They involve a lot of time and financial input to prepare and host. Displays may have to be hosted over a number of weeks to reach a wide</i>	<i>Consider what in house resources are available to make this a more cost effective exercise.</i>	<i>Roadshow drop-in events were undertaken at different times of the day (including evening sessions) at the following locations:</i> <ul style="list-style-type: none"> • <i>Prescot Town Centre (Eccleston St)</i> • <i>Kirkby Town Centre (Newtown Gardens)</i> • <i>Huyton Town Centre (Derby Road)</i> • <i>Halewood (The Halewood Centre)</i> • <i>Whiston (Whiston Town Council offices)</i> <i>These drop-in events were publicised</i>

		<i>variety of people.</i>		<i>through consultation materials and online.</i>
--	--	---------------------------	--	---

3.7 Documents at Council offices and libraries

Consultation / involvement method	Role	Resource requirements	Action to be taken	Actions undertaken through the Preferred Options consultation
Documents for inspection at Council Offices and libraries.	Planning documents to be placed at libraries and local planning office during statutory consultation periods and when adopted.	Low Documents to be printed and taken to relevant sites. Staff at those sites will be made aware of what the documents are so they can inform people they are available.	Regular check of libraries to see if Adopted documents are there and are accessible. Training and information to be given to staff regarding documents for consultation.	Copies of Preferred Options Report, Draft Green Belt study, leaflets, response forms and FAQs were deposited at the following locations: 4 One Stop Shops (Huyton, Kirkby, Prescot and Halewood) 5 Libraries (Huyton, Kirkby, Halewood, Stockbridge Village, Whiston and Prescot) Library and One Stop Shop staff were served with information regarding the consultation and public access to consultation materials.

3.8 Leaflets

Consultation / involvement method	Role	Resource requirements	Action to be taken	Actions undertaken through the Preferred Options consultation
Leaflets and brochures	There are a number of leaflets and brochures available that explain the planning process. New leaflets may be necessary to improve awareness of the new planning system and provide non-technical summaries of emerging and adopted documents.	Medium Professionally developed leaflets can be costly and time consuming to make. However, there are within corporate communications skills to do this.	A list of all available material will be compiled and made available.	<p>A Summary Leaflet of the Preferred Options report was produced and widely circulated. This included a summary of the spatial strategy and key diagram, as well as a description of the consultation process. This included a questionnaire and the ability to return written responses using a Freepost address.</p> <p>A list of FAQs was prepared to accompany the consultation and posted on the Council's website as well as being deposited in key locations (libraries and One Stop Shops).</p>

3.9 Press Articles

Consultation / involvement method	Role	Resource requirements	Action to be taken	Actions undertaken through the Preferred Options consultation
<i>Statutory notices in</i>	<i>Legal requirements for Development</i>	Low <i>This is a legal</i>	<i>Continue existing procedure. Use to</i>	<i>A notice was placed within the Daily Post newspaper notifying the</i>

<i>press</i>	<i>Plan Documents and Supplementary Planning Documents.</i>	<i>requirement undertaken when necessary.</i>	<i>Publicise documents at appropriate stages.</i>	<i>commencement of the consultation period and the arrangements for viewing materials and submitting representations.</i>
Media press and broadcasting The Challenge newspaper	Newspapers and Radio can reach a wide range of people and advertise document preparation and publication. However, it is cost prohibitive and will only be used to meet the requirements of publicising main documents.	High The cost of using media is high. Unless a particularly Controversial proposal is put forward or there is an interest expressed by the media in a certain topic.	Explore ‘piggy backing’ other Council press initiatives or advertising several documents at the same time to save money and increase the potential to do more advertising. Also consider using lower cost free newspapers.	In addition to the press notice placed in the Daily Post, articles regarding the Preferred Options consultation were placed in the Knowsley Challenge newspaper and the Knowsley News magazine. Press coverage of the Preferred Options consultation was received through several radio items on Radio Merseyside.

3.10 Questionnaire / Survey

Consultation / involvement method	Role	Resource requirements	Action to be taken	Actions undertaken through the Preferred Options consultation
Letters, questionnaires and surveys.	The consultation database will enable letters to be sent to	Medium Preparing information to	Explore electronic methods of conducting questionnaires and	Letters were sent to specific consultation bodies as described.

	<p>those that have requested to be consulted on specific issues. Questionnaires and surveys can be used in conjunction with these letters to gain evidence at the early stages of document preparation.</p>	<p>be sent out and logging responses can take time and be costly.</p>	<p>surveys.</p>	<p>A Summary Leaflet of the Preferred Options Report was produced and widely circulated. This included a questionnaire and the ability to return written responses using a Freepost address.</p> <p>Electronic “Objective” software was used to enable consultees to submit their comments online.</p>
--	---	---	-----------------	--

3.11 Knowsley News

Consultation / involvement method	Role	Resource requirements	Action to be taken	Actions undertaken through the Preferred Options consultation
Knowsley News	Free newspapers produced by the Council and circulated to all residents in the borough. They can carry articles and advertisements regarding planning matters.	Low It is free to place information in these papers and they have a wide circulation.	There is a question whether all residents receive these papers, so other forms of media should be used in conjunction. Also, deadlines for articles may not always coincide with when a document is being produced. A list of	An article was placed in an Issue of the Knowsley News prior to the commencement of the consultation period, noting the forthcoming consultation and the methods of public involvement.

			deadline dates should be compiled so consultation periods can coincide.	
--	--	--	---	--

3.12 Groups to be consulted

- **Consultees: those who commented earlier**

Following the Issues and Options consultation in 2009/10, the Council assembled a database of those who have registered an interest in the development of the Knowsley LDF, including those who have contacted the Council and requested to be kept informed of the progress of Core Strategy, as well as those who commented on other documents within the LDF, such as the Statement of Community Involvement or a Supplementary Planning Document. All of those on the consultation database received an email notifying them of the commencement of the consultation period for the Preferred Options consultation, which also explained how comments could be made.

As part of the Preferred Options consultation, it was made clear to respondents that they could be kept informed of future LDF consultations by requesting to be added to the Council's database, or by registering online.

- **Consultees: specific consultees**

A range of agencies and organisations have been identified by the Council as specific consultation bodies for the Knowsley LDF. These bodies are identified in accordance with the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 and are listed within the Statement of Community Involvement at Appendix 1 (reproduced below). At the commencement of the Preferred Options consultation, these bodies received an email and a formal letter notifying them of the commencement of the consultation period, along with a paper copy of the full Preferred Options report as well as a summary leaflet.

- **Consultees: general consultees / other consultees**

The Council has developed a list of other groups, agencies and organisations which it anticipates may be interested in the development of the Knowsley LDF. In some cases, such organisations have also requested that they be informed of the progress of the LDF. These consultees have been added to the LDF consultation database and hence also received an email regarding the commencement of the Preferred Options consultation. The general consultees and other consultees are listed in Appendix 1.

Excerpt from Statement of Community Involvement (KMBC, May 2007)

Appendix 1: List of potential consultees on the Local Development Framework
--

Specific consultation bodies

- North West Regional Assembly
- North West Regional Development Agency
- Neighbouring Authority or any part of whose area is in or adjoins the area of the local planning authority
- Natural England
- The Environment Agency*
- English Heritage*
- Highways Agency
- The Historic Buildings and Monuments Commission for England
- Network Rail
- Regional Development Agency whose area is in or adjoins the area of the local planning authority
- Strategic Health Authority
- Person to whom a licence has been granted under Section 7(2) of the Gas Act 1986
- Sewage undertaker
- Water undertaker
- Any person to whom the electronic communications code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003
- Any person who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority
- Town and Parish Councils both within and adjoining the area

Government Departments

- Government Office North West
- Home Office
- Department for Education and Skills (through Government Offices)
- Department for Environment, Food and Rural Affairs
- Department for Transport (through Government Offices)
- Department for Transport rail group (through Government Offices)
- Department of Health (through relevant Regional Public Health Group)
- Department of Trade and Industry (through Government Offices)
- Ministry of Defence
- Department of Work and Pensions
- Department of Constitutional Affairs
- Department for Culture, Media and Sport
- Office of Government Commerce (Property Advisers to the Civil Estate)

General consultation bodies

- Voluntary bodies some or all of whose activities benefit any part of the authority's area
- Bodies which represent the interests of different racial, ethnic or national groups in the authority's area

- Bodies which represent the interests of different religious groups in the authority's area
- Bodies which represent the interests of disabled persons in the authority's area
- Bodies which represent the interests of persons carrying on business in the authority's area

Other consultees

- Age Concern
- Airport operators
- British Chemical Distributors and Traders Association
- British Geological Survey
- British Waterways, canal owners and navigation authorities;
- Centre for Ecology and Hydrology;
- Chambers of Commerce, Local CBI and local branches of Institute of Directors;
- Church Commissioners;
- Civil Aviation Authority;
- Coal Authority;
- Commission for Architecture and the Built Environment
- Commission for New Towns and English Partnerships;
- Commission for Racial Equality
- Confederation of Passenger Transport
- Crown Estate Office
- Diocesan Board of Finance;
- Disability Rights Commission;
- Disabled Persons Transport Advisory Committee;
- Electricity, Gas, and Telecommunications Undertakers, and the National Grid Company;
- Environmental groups at national, regional and local level, including:
 - Council for the Protection of Rural England
 - Friends of the Earth
 - Royal Society for the Protection of Birds
 - Wildlife Trusts
- Equal Opportunities Commission
- Fire and Rescue Services
- Forestry Commission
- Freight Transport Association
- Gypsy Council
- Health and Safety Executive
- Help the Aged
- Housing Corporation
- Learning and Skills Councils
- Local Agenda 21 including
 - Civic Societies
 - Community Groups
 - Local Transport Authorities

- Local Transport Operators
- Local Race Equality Councils and other local equality groups;
- Merseyside Environmental Advisory Services
- Mersey Forest
- National Playing Fields Association
- Passenger Transport Authorities
- Passenger Transport Executives
- Police Architectural Liaison
- Officers/Crime Prevention Design Advisors
- Port Operators;
- Rail Companies and the Rail Freight Group
- Regional Development Agencies
- Regional Housing Boards
- Regional Sports Boards
- Road Haulage Association
- Royal Mail Group Property
- Sport England
- Sustrans
- The Home Builders Federation
- Transport for London
- Traveller Law Reform Coalition
- Water Companies
- Women's National Commission

This list is not exhaustive. It also relates to successor bodies where re-organisations occur.

When a body changes its name, disbands or is replaced by another body this appendix will be updated.

A full database of consultees is kept by the Council's forward planning team.

Appendix B: Cabinet Agenda, Agenda Pack and Minutes

At the Knowsley Council Cabinet meeting of 8th June 2011, approval was given for the publication of the Preferred Options Report for a period of public consultation.

The following links detail the Agenda, Agenda Pack and Minutes of this meeting, as hosted on the Council's website.

Cabinet Agenda:

[http://councillors.knowsley.gov.uk/Published/C00000116/M00005325/\\$\\$\\$Agenda.doc.pdf](http://councillors.knowsley.gov.uk/Published/C00000116/M00005325/$$$Agenda.doc.pdf)

Cabinet Agenda Pack:

[http://councillors.knowsley.gov.uk/Published/C00000116/M00005325/\\$\\$ADocPackPublic.pdf](http://councillors.knowsley.gov.uk/Published/C00000116/M00005325/$$ADocPackPublic.pdf)

Cabinet Minutes:

[http://councillors.knowsley.gov.uk/Published/C00000116/M00005325/\\$\\$\\$Minutes.doc.pdf](http://councillors.knowsley.gov.uk/Published/C00000116/M00005325/$$$Minutes.doc.pdf)

Appendix C: Publicity Materials

This appendix contains items used during the Preferred Options consultation. Items are attached within this appendix in the following order:

1. Preferred Options Consultation Letter
2. Preferred Options Full Response Form
3. Local Development Framework Frequently Asked Questions – Preferred Options
4. One Stop Shop and Library Briefing Notes
5. Knowsley Council Website Screenshots
6. “Help Plan Knowsley!” Facebook Group Screenshots
7. Daily Post Press Notice
8. Preferred Options Summary Leaflet

Item 1. Preferred Options Consultation Letter

Please ask for: Jonathan Clarke
Tel No: 0151 443 2299
Email: jonathan.clarke@knowsley.gov.uk

Our Ref: LDF Consultation

Date: 27 June 2011

Dear Sir/Madam,

RE: Consultation on Knowsley's Local Development Framework Core Strategy Preferred Options Report

The Council has prepared its Core Strategy Preferred Options Report which is a central part of its Local Development Framework and we would like to invite you to make comments.

We are at an important stage of developing the Core Strategy, which will guide the growth and development of Knowsley up to 2027. Using feedback from previous consultations and available evidence, the Council has now prepared its preferred spatial strategy for Knowsley. The Preferred Options Report covers important topics such as regeneration, housing, employment, town centres, design, greenspaces and reducing the impacts of climate change. To help you to consider the preferred policy options in more detail, we have undertaken a range of assessments relating to matters including sustainability, health, equality and impacts on habitats.

We are carrying out ten weeks of public consultation, running from **Monday 27 June 2011 to 5pm Monday 5 September 2011**. During this time, the Core Strategy Preferred Options Report is available to view on the Council's website at (www.knowsley.gov.uk/LDF) and in a variety of locations around the Borough, including the libraries and Council one stop shops. Responses can be made by completing the response form online, by email or by post. Further details of how you can view and respond to the report are provided overleaf.

If you have any queries about the documents or how to send your views please contact a member of the Council's Places and Neighbourhoods Team on: 0151 443 2326.

If you do not wish to receive further information about the Core Strategy please let us know and we shall remove your details from our database.

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

Yours faithfully,

J Clarke

Jonathan Clarke
Places and Neighbourhoods Manager
Policy, Impact and Intelligence Division

Cont.

How can I find out more and submit my views?

Knowsley's Core Strategy Preferred Options Report will be available for inspection during the period of public consultation which will commence on Monday 27 June 2011 and run until 5pm on Monday 5 September 2011.

Online: The Preferred Options Report and supporting materials can be viewed online at: www.knowsley.gov.uk/LDF. The online portal also presents a method for submitting responses.

One stop shops and libraries: The Preferred Options Report and supporting materials can be inspected at all Council one stop shops and libraries during normal opening hours.

Drop in events: Come along to one of the following drop in events (all 10am to 4pm):

Eccleston Street, Prescot town centre

- Saturday 2 July
- Tuesday 26 July

Newtown Gardens, Kirkby town centre

- Tuesday 5 July
- Saturday 6 August

Derby Road, Huyton town centre

- Friday 8 July
- Saturday 13 August

The Halewood Centre (Raven Court)

- Friday 15 July
- Saturday 20 August

Facebook: search for "Help plan Knowsley!"

TypeTalk: 18001 0151 443 2326

Contact us: Further information can be obtained by contacting the Council's Places and Neighbourhoods Team by:

- Email: LDF@knowsley.gov.uk
- Telephone: 0151 443 2326
- Post: Places and Neighbourhoods Manager, Chief Executive's Directorate, Knowsley Council, Archway Road, Huyton, Merseyside, L36 9YU (postage required)

Returning responses: Response forms are available online, at Council one stop shops and libraries, and on request from the Places and Neighbourhoods team.

You can return responses online via the Council's website, or via email or post using the above addresses. All responses must reach us by **5pm on Monday 5 September 2011**.

Item 2. Preferred Options Full Response Form**RESPONSE FORM****Knowsley Local Development Framework
Core Strategy Preferred Options Report****Knowsl@y Council**

KNOWing the value of Consultation

Knowsley Council's Core Strategy Preferred Options Report is available to com
2011 until 5pm on Monday 5 September 2011.

An interactive version of the Preferred Options Report is available on the Council's website at www.knowsley.gov.uk/LDF. Instructions on how to enter responses are provided on the website. This is the Council's preferred method of receiving comments as it will help us to handle your response quickly and efficiently. If you are unable to use the on-line response questionnaire you may submit responses using this form. Further copies can be downloaded from the Council's website, from Council offices, or the form can be photocopied.

Your comments must be received by Knowsley Council NOT LATER THAN 5pm on Monday 5 September 2011.

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

Please return by email to LDF@Knowsley.gov.uk or by post to Places and Neighbourhoods Manager, Chief Executive's Directorate, Knowsley Council, Archway Road, Huyton, Merseyside, L36 9YU (postage required). If you have any queries, please ring the Council's Places and Neighbourhoods Team on 0151 443 2326.

Your contact details (block capitals)

Title:	Forename:	Surname:
Company (if applicable):		Position Held:
Address:		
Town:		
County:		Postcode:
Telephone Number:		
E-mail Address:		

If you are acting as an agent for someone please give their name and contact details:		
<i>Title:</i>	Forename:	Surname:
<i>Company (if applicable):</i>		<i>Position Held:</i>
<i>Address:</i>		
<i>Town:</i>		
<i>County:</i>		<i>Postcode:</i>
<i>Telephone Number:</i>		
<i>E-mail Address:</i>		

Item 3. Local Development Framework Frequently Asked Questions – Preferred Options

<h2>Knowsley's Local Development Framework Consultation on the Core Strategy Preferred Options Report</h2>

Frequently Asked Questions

(click to follow)

[What is Knowsley's Local Development Framework \(LDF\)?](#)

[What is included in the LDF?](#)

[Why is the LDF being produced?](#)

[What is the aim of the LDF?](#)

[What key challenges are we trying to tackle?](#)

[What are the benefits of the LDF?](#)

[How does the LDF affect the current planning system?](#)

[Will the Council use evidence to support the preparation of the LDF?](#)

[What evidence has the Council produced so far?](#)

[What is the timetable for the preparation of the LDF?](#)

[How have my previous views on the Issues and Options paper been taken into consideration?](#)

[At what stage is the LDF preparation presently at?](#)

[What is the purpose of the Preferred Options report?](#)

[How is the information available?](#)

[When is the consultation period for the Preferred Options report?](#)

[Are there any additional documents that I need to know about?](#)

[How can I submit my views?](#)

[When and where are the consultation events?](#)

[What happens after the consultation period ends?](#)

[What happens next?](#)

[Will I be able to comment again after the Preferred Options stage?](#)

[How can I get more information on the LDF?](#)**Frequently Asked Questions****What is Knowsley's Local Development Framework (LDF)?**

Knowsley Council is producing a new development plan that will shape the growth and development of the Borough up to 2027. The Local Development Framework (LDF) will over time replace the existing Replacement Unitary Development Plan (UDP).

What is included in the LDF?

The LDF will be made up of a number of individual documents that set out the Councils' policies for promoting, guiding and managing development of the Borough.

Why is the LDF being produced?

The Planning and Compulsory Purchase Act 2004 requires the Council to replace the current UDP (adopted 2006) with new Development Plan Documents (DPDs) forming part of the Council's LDF, the most important of these being a **Core Strategy**. Other Development Plan Documents (DPDs), Supplementary Planning Documents (SPD) and a new Proposals Map will also be produced.

What is the aim of the LDF?

The LDF will help ensure that Knowsley becomes a **Borough of Choice** by 2027. It will identify how and where our towns will develop, providing a development focus for issues such as housing, employment, leisure and retail for the next 10-20 years, whilst identifying areas of restraint and protection of environmental or heritage value. The LDF will promote, guide and manage the future development of Knowsley and make important choices about how and where new development and regeneration will take place. The LDF will also shape the investment plans of the Council and other public, voluntary and private sector organisations.

What key challenges are we trying to tackle?

Evidence based upon localised need suggests that there is a requirement for a further 7650 homes to be built in Knowsley up to 2027. We also need to decide how our town centres and employment areas should develop and how we should tackle the high levels of deprivation which exist in Knowsley.

What are the benefits of the LDF?

The intention of the LDF is to streamline the local planning process, improve flexibility in the planning system, strengthen community and stakeholder involvement, and contribute to achieving sustainable development.

How does the LDF affect the current planning system?

The main difference is that individual DPDs can be reviewed individually. This should speed up the process of review, helping to keep the LDF up to date.

There will be no difference in the way that we receive and deal with planning applications under current UDP policies, until the Core Strategy is adopted and a number of policies are therefore replaced. A schedule of UDP policies proposed to be deleted upon adoption of the Core Strategy is included within Appendix D of the Preferred Options report. Other UDP policies will remain saved until superseded through the adoption of subsequent DPDs.

Will the Council use evidence to support the preparation of the LDF?

A key feature of the LDF is that policies and proposals are based on a robust and up to date evidence base. The evidence base requirements are set out in various Planning Policy Statements (PPSs) which are produced by the Government.

What evidence has the Council produced so far?

A number of specialist studies or research projects have been completed or are ongoing. Finished documents and progress on ongoing evidence preparation can be viewed via www.knowsley.gov.uk/LDF.

What is the timetable for the preparation of the LDF?

The full timetable for the production of the Local Development Framework (LDF) can be viewed via www.knowsley.gov.uk/LDF.

How have my previous views on the Issues and Options paper been taken into consideration?

Between November 2009 and January 2010 the Council consulted extensively on the Core Strategy **Issues and Options** paper which sought views on key choices facing the Borough. The findings of this earlier consultation can be found in the Core Strategy - Issues and Options: Report of Consultation, which can be viewed via www.knowsley.gov.uk/LDF and have been used to inform the Council's **Preferred Options Report**.

At what stage is the LDF preparation presently at?

The **LDF Core Strategy** is currently at **Preferred Options** stage. Other LDF documents are at varying stages of preparation – see www.knowsley.gov.uk/LDF for further details.

What is the purpose of the Preferred Options report?

The **Preferred Options** report is part of our process of preparing Knowsley's **Core Strategy** Development Plan Document (DPD) setting out how the Council proposes to address key issues about how and where development in Knowsley could best be built up to 2027.

How is the information available?

A **Preferred Options** booklet will be circulated to all residents of Knowsley, with additional consultation events being organised throughout the Borough.

The full **Preferred Options** report is available to view online at www.knowsley.gov.uk/LDF, and copies will also be available within the consultation period at all Council one stop shops and libraries during normal office hours.

When is the consultation period for the Preferred Options report?

The consultation period for the **Preferred Options** report will take place for a ten week period from Monday 27th June 2011. All comments on this stage must reach us by 5pm on Monday 5th September 2011.

Are there any additional documents that I need to know about?

A **Sustainability Appraisal (SRA)**, **Habitats Regulations Assessment (HRA)** and **Health Impact Assessment (HIA)** have been undertaken on the Preferred Options report and are also published for representations to be made on them during the consultation period, together with a number of documents providing additional technical information to support this Preferred Options Report. All these documents are also available to view and comment upon online at www.knowsley.gov.uk/LDF.

How can I submit my views?

You can return your views to us using the cut off slip attached to the **Preferred Options** booklet, or alternatively use the online form at www.knowsley.gov.uk/LDF. You can also write to the Council at:

Places and Neighbourhoods Team
Chief Executive's Directorate
First Floor Annexe
Huyton Municipal
Archway Rd
Huyton
L36 9YU

Or email your response to: ldf@knowsley.gov.uk.

When and where are the consultation events?

We will be holding drop-in events in each of Knowsley's town centres over the summer. The dates and times are as follows:

Month	Date	Day	Time	Centre	Location
July	2	Saturday	10am – 4pm	Prescot	Eccleston Street
	5	Tuesday	10am – 4pm	Kirkby	Newtown Gardens

	8	Friday	10am – 4pm	Huyton	Derby Road
	15	Friday	10am – 4pm	Halewood	Halewood Centre
	26	Tuesday	10am – 4pm	Prescot	Eccleston Street
August	6	Saturday	10am – 4pm	Kirkby	Newtown Gardens
	13	Saturday	10am – 4pm	Huyton	Derby Road
	20	Saturday	10am – 4pm	Halewood	Halewood Centre

What happens after the consultation period ends?

We will carefully consider all comments and views received about the options presented, other evidence and Government requirements, and prepare a Report of Consultation, which will inform the content of the next stage (the Publication version of the Core Strategy).

What happens next?

We will carefully consider all comments and views received, other evidence and Government requirements and prepare a final version of the Core Strategy, known as the Proposed Submission Version.

This document will be the final version of the plan which the Council will be seeking to submit to the Government and eventually adopt. There will be a further opportunity to share your views at this stage, although the consultation will be relatively limited in accordance with Government regulations. Following an Examination in Public, the Council will seek to adopt the Core Strategy in 2012.

Please keep checking www.knowsley.gov.uk/LDF for regular updates on Core Strategy progress. You can register your contact details online to receive future updates.

Will I be able to comment again after the Preferred Options stage?

Upon publication of Core Strategy in early 2012 there will be another consultation period providing opportunity for final comment related to the soundness and legal compliance of the strategy only. That stage will be the final period for representations before its submission to the Government for examination by an independent Planning Inspector.

How can I get more information on the LDF?

For further information and to keep up to date with the Core Strategy consultations or any other public consultations relating to the LDF, please visit the following section of the Knowsley Council website: www.knowsley.gov.uk/LDF.

You can also contact the Places and Neighbourhoods Team using the below contact details to be added to our LDF consultation database.

Please contact us on:

Address:

Places and Neighbourhoods Team
Chief Executive's Directorate
First Floor Annexe
Huyton Municipal
Archway Rd
Huyton
L36 9YU

Telephone: 0151 443 2326

Email: ldf@knowsley.gov.uk

Item 4. One Stop Shop and Library Briefing Notes

Knowsley's Local Development Framework

**Consultation on the Core Strategy Preferred Options Report
Monday 27 June 2011 – 5pm Monday 5 September 2011**

Important Information for One Stop Shop and Library colleagues

This box file contains:

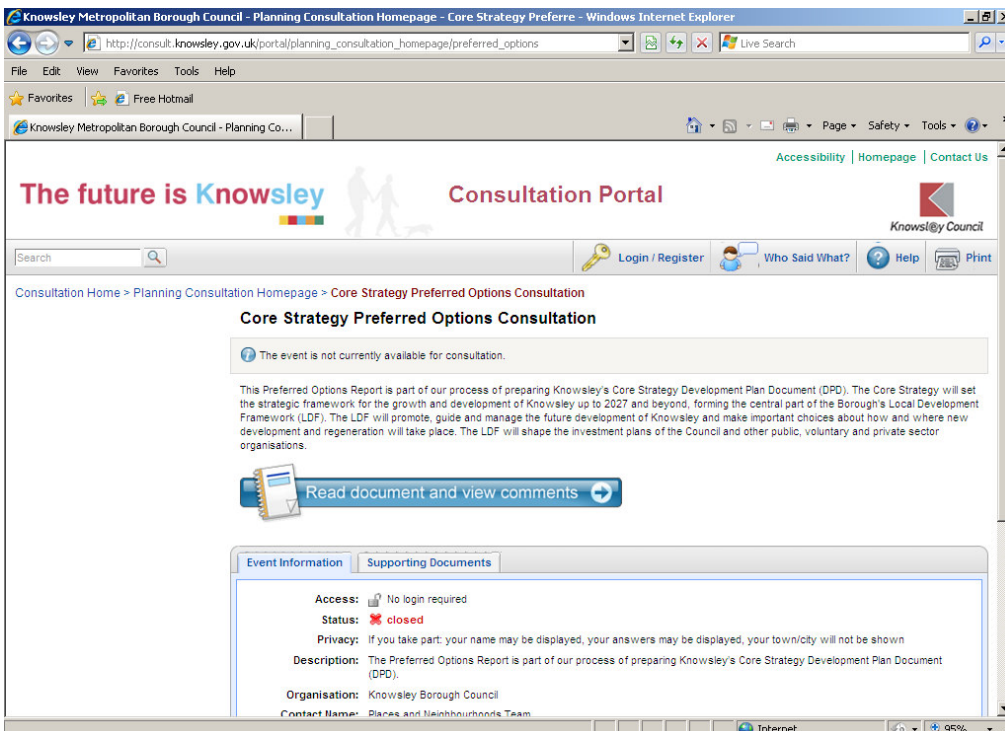
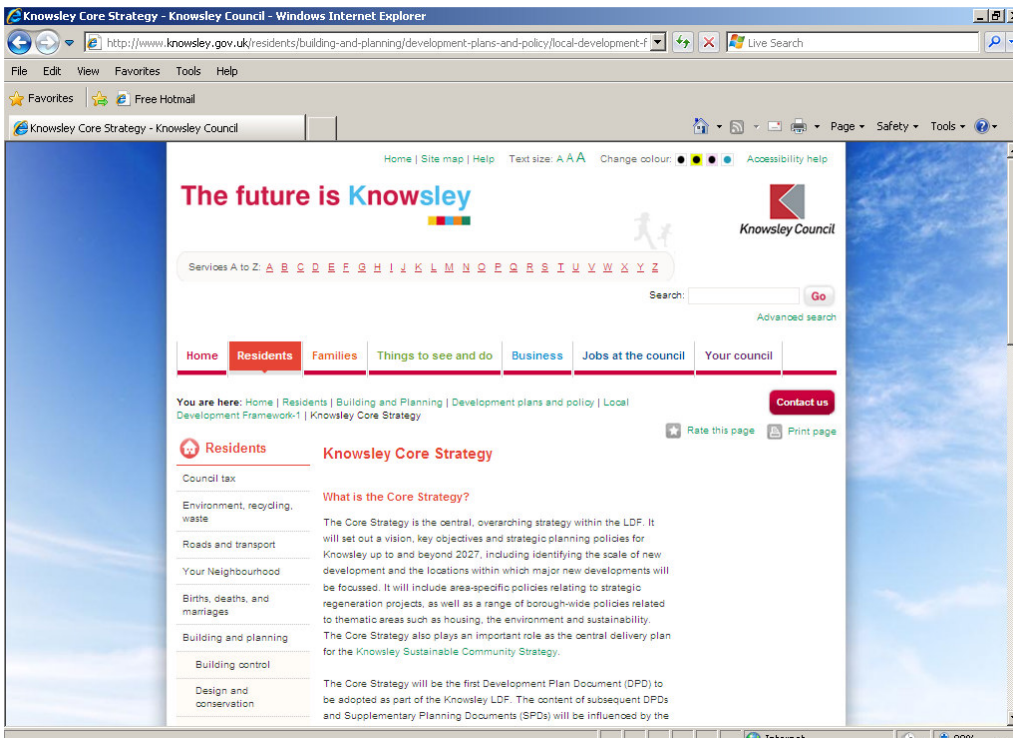
- Core Strategy Preferred Options Report
 - Frequently Asked Questions
 - Copies of the leaflet 'Have your say on the future of Knowsley'
 - Copies of the Response Form
- The Core Strategy Preferred Options Report has been provided to all of Knowsley's One Stop Shops and Libraries and is required to be available on request for members of the public to consult during all normal opening hours for the whole of the above specified period.
 - This document, together with the list of Frequently Asked Questions need to be "controlled" by the staff of the One Stop Shop/Library, that is, issued across the counter and returned to the counter. The documents must not be removed from the One Stop Shop/Library.
 - It is essential that the documents are kept intact.

If these documents need to be replaced, wholly or in part, at any time during the above-specified dates it is essential that you advise colleagues in the Places and Neighbourhoods Team on the phone number given below. Failure to have these documents available for the public could invalidate the public consultation procedure and result in serious legal implications for the Council.

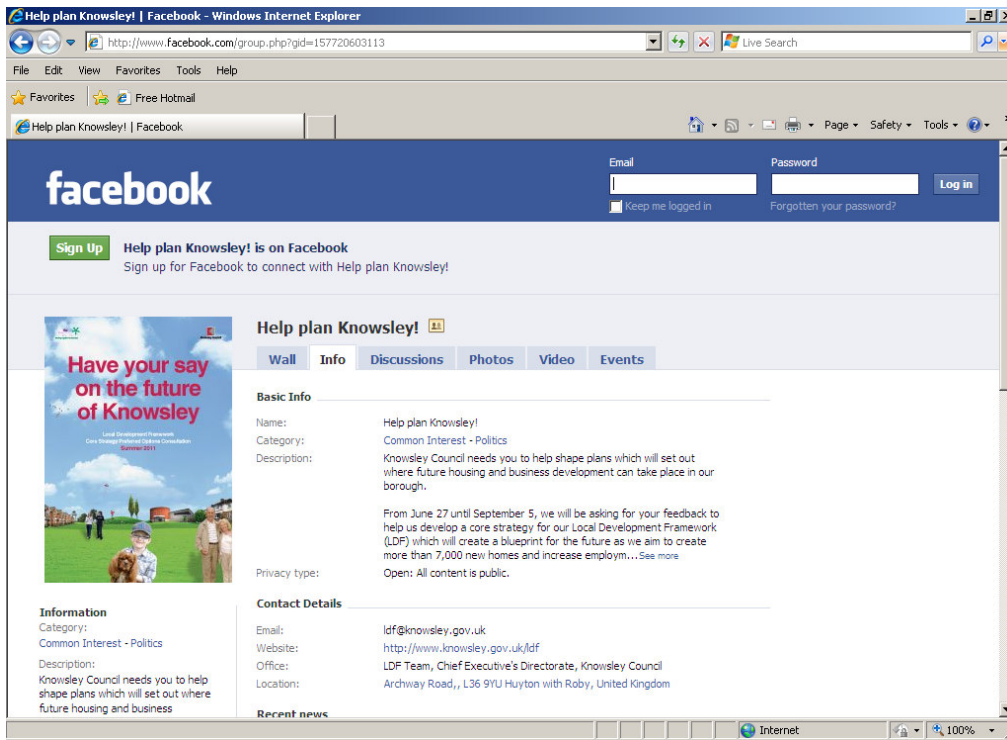
- Copies of the leaflet 'Have your say on the future of Knowsley' and the Response Form can be given to members of the public to complete. The leaflet provides a summary of some of the key issues in the Core Strategy Preferred Options Report, and includes a tear-off slip which can be completed and returned to the Council. The Response Form provides an opportunity for a more detailed response to the full Preferred Options Report or its supporting materials. Both documents can be returned to staff and stored in the box file or can be posted directly to the Council's Places and Neighbourhoods team.
- A member of the Places and Neighbourhoods team will collect the box file and its contents after Monday 5th September 2011.

***If you have any queries of any kind relating to this information note or any aspect of the Core Strategy, please do not hesitate to contact the Places and Neighbourhoods Team on:
443 2326 (between 9:00am and 5:00pm, weekdays) or by email at LDF@Knowsley.gov.uk***

Item 5. Knowsley Council Website Screenshots



Item 6. "Help Plan Knowsley!" Facebook Group Screenshots



Item 7 Daily Post Press Notice (27th June 2011)

Town and Country Planning (Local Development) (England) (Amendment) Regulations 2004 - Regulation 25

Knowsley Local Development Framework: Core Strategy Development Plan Document

Knowsley Metropolitan Borough Council is preparing a Core Strategy Development Plan Document as part of its Local Development Framework. The Core Strategy will, once adopted, set out the long term vision, objectives and spatial development strategy for Knowsley.

The Council's Cabinet, at its meeting on 8 June 2011, approved a **Local Development Framework Core Strategy: Preferred Options Report** for consultation purposes. The Preferred Options Report sets out a series of questions and options concerning how the Borough may develop in the future.

The Preferred Options Report will be made available for public inspection between 9.00am and 5.00pm from **27th June 2011** until **5th September 2011** (excluding weekends and bank holidays) at the following Council offices:

- Halewood One Stop Shop, The Halewood Centre, Roseheath Drive, Halewood, Knowsley, L26 9UH
- Prescott One Stop Shop, Prescott Shopping Centre, Aspinall Street, Prescott, Knowsley, L34 5GA
- Huyton One Stop Shop, Archway Road, Huyton, Knowsley, L36 9YU
- Kirkby One Stop Shop, Cherryfield Drive, Knowsley, L32 1TX

The documents will also be available for public inspection in the libraries at Huyton, Halewood, Kirkby, Page Moss, Prescott, Whiston and Stockbridge Village. The opening hours for each library vary and details of these and the address of each library are available to view on the Council website at: www.knowsley.gov.uk/residents/libraries. All documents are also available on the Council's website at www.knowsley.gov.uk/LDF.

We would welcome your views on the Preferred Options Report. Any representations must be submitted in writing to arrive with the Council before **5.00 pm on Monday 5th September 2011**. Representations may be accompanied by a request to be notified, at a specific address, of the progress of the Core Strategy. To help you submit comments, a response form is available at the above locations. You may submit representations by the following means:

- Submitting comments on line at www.knowsley.gov.uk/LDF
- By e-mail to: LDF@knowsley.gov.uk
- In writing to:
Places and Neighbourhoods Manager
Chief Executive's Directorate
Knowsley Council
Archway Road
Huyton
Merseyside

L36 9YU

If you require any further information please contact the Places and Neighbourhoods Team on 0151 443 2326.

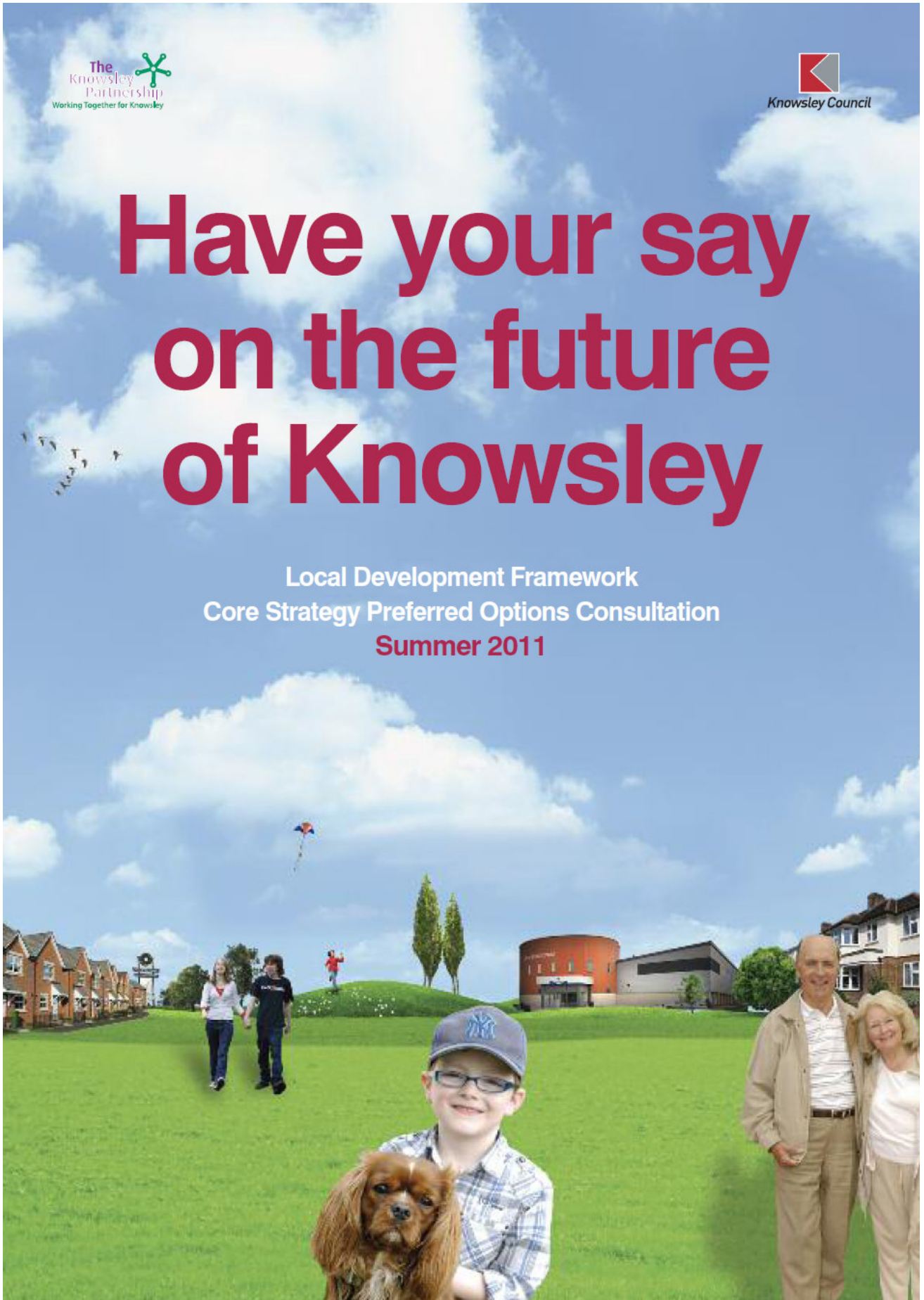
**MIKE HARDEN
DEPUTY CHIEF EXECUTIVE**

Item 9 Preferred Options Summary Leaflet



Have your say on the future of Knowsley

Local Development Framework
Core Strategy Preferred Options Consultation
Summer 2011



What are we trying to do?

Knowsley Council is putting together its Local Development Framework - a plan which will set out how Knowsley will develop in the future.

At the heart of this plan will be a **Core Strategy** which will state where new homes can be built and where business development can take place.

We have reached a key stage in the preparation of the Core Strategy and now want to ask you for your views. We have prepared a **Preferred Options** report which sets out our latest proposals. Our aim is to:

- create **attractive places** for people to live, work and spend their leisure time;
- deliver more than 7,000 **new homes** in Knowsley by 2027;
- create opportunities for **new employment**;
- decide how our **town centres** and smaller shopping areas should be developed;
- make the best use of Knowsley's **green spaces**; and
- decide how we tackle **climate change**.

You will find more detail about what is proposed within this leaflet, as well as details on how you can have your say to influence the final strategy.

Borough wide Preferred Spatial Strategy

Knowsley's future development

The development of Knowsley to 2027 will include:

- a strong focus on development within existing urban areas, particularly those needing regeneration;
- maintaining Huyton/Stockbridge Village, Kirkby, Prescott/Whiston and Halewood as larger suburban centres, and Cronton, Tarbock and Knowsley Village as rural villages; and
- reviewing green belt boundaries to meet long term housing and employment needs.

We will aim to:

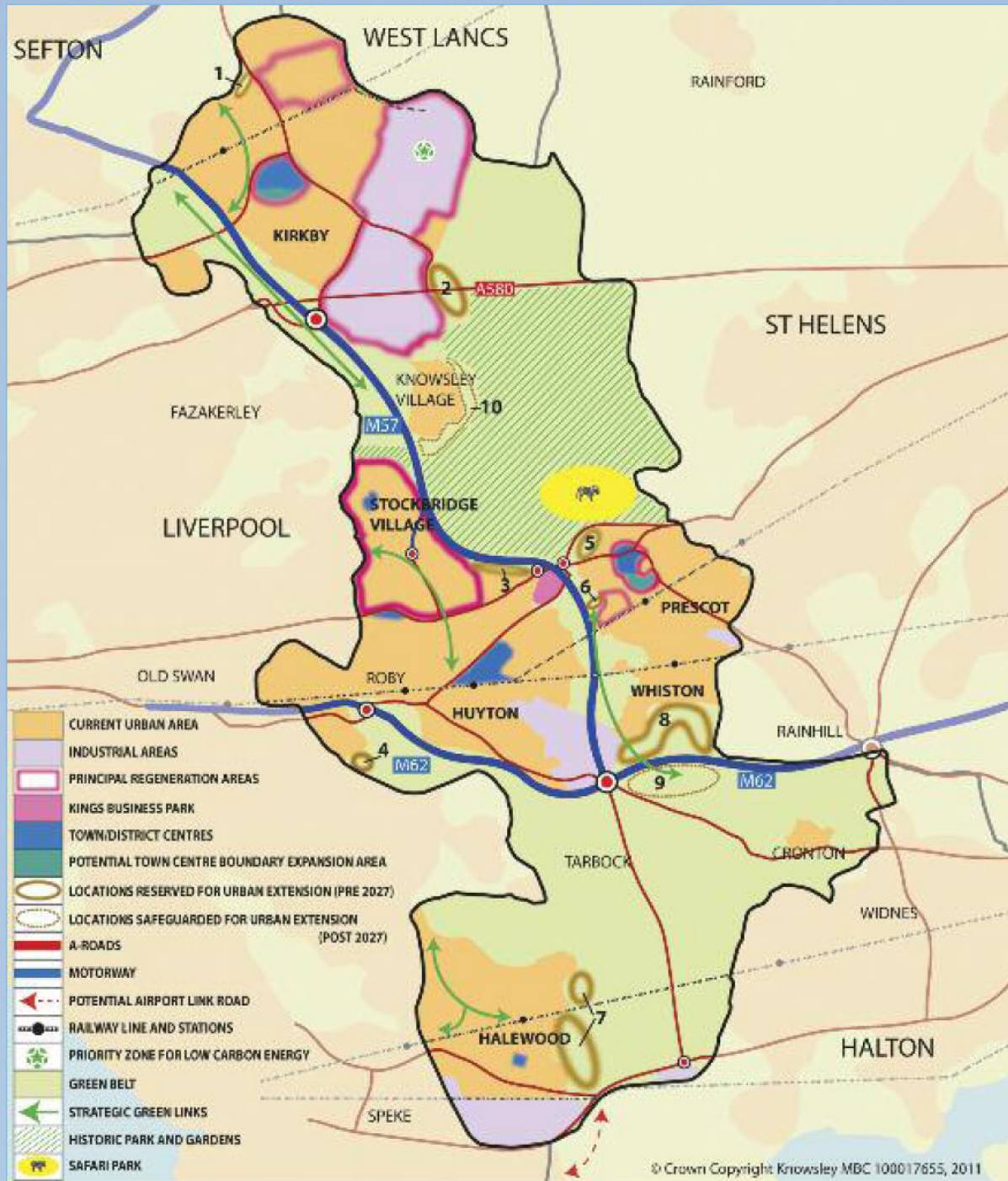
- provide a wide choice of new and affordable homes;
- regenerate and improve existing residential areas;
- enhance existing employment areas and provide sites and premises for new employment development;
- maintain and enhance the borough's town and district centres;
- maintain and enhance roads, public transport and opportunities for walking and cycling; and
- improve the quality and accessibility of green spaces.

Principal Regeneration Areas

We will encourage development and regeneration particularly in the following Principal Regeneration Areas:

- North Huyton and Stockbridge Village;
- Kirkby Town Centre;
- Tower Hill, Kirkby;
- Knowsley Industrial and Business Parks;
- Prescott Town Centre; and
- South Prescott

Knowsley in 2027 - overall proposals



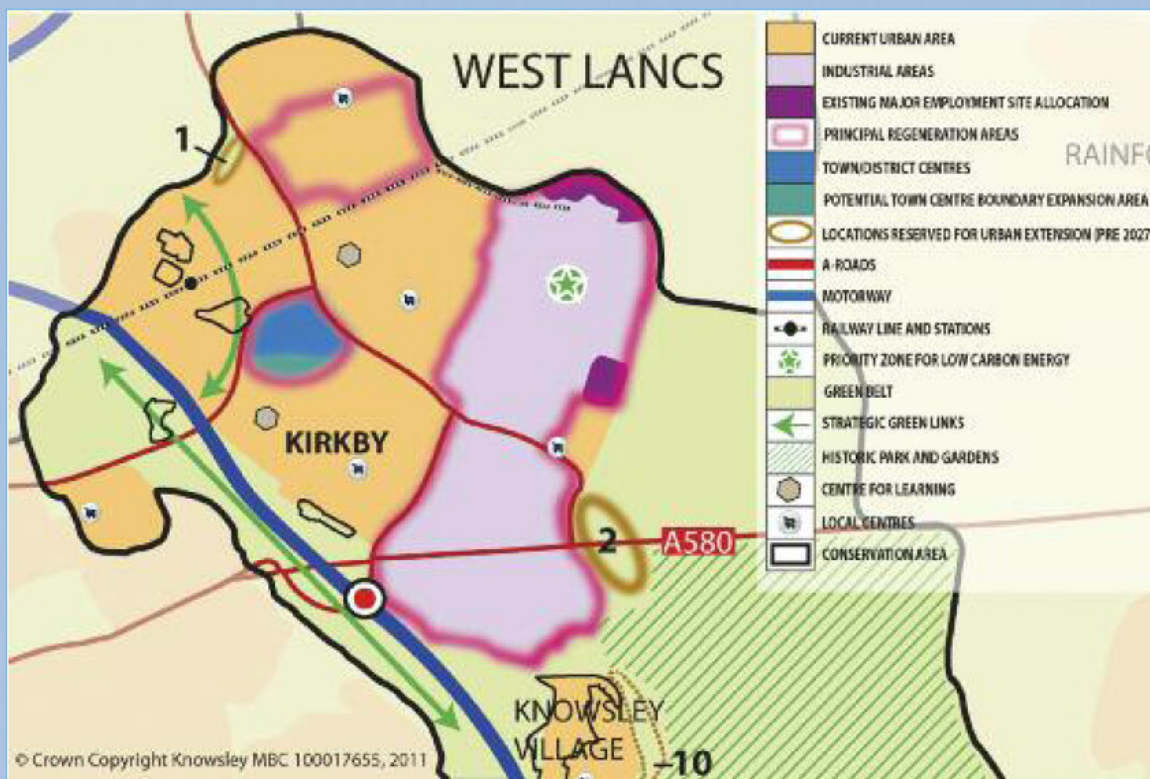
Huyton and Stockbridge Village



Area priorities

- To support housing led regeneration in North Huyton and Stockbridge Village and new affordable housing in South Huyton
- To improve and develop Huyton and Kings Business Parks
- To review the green belt boundary to meet long term development needs at:
 - Knowsley Lane, to the north of Huyton (for housing and employment uses) (3); and
 - Edenhurst Avenue, to the south west of Huyton (for housing) (4)
- To enhance shopping opportunities in Huyton Town Centre and increase the day and evening leisure offers and other service uses
- To improve Stockbridge Village District Centre with more retail, community and leisure facilities, and enhanced school provision
- To improve transport links between neighbourhoods and places of work
- To recognise the historic character of the area and its townscape
- To strengthen the Green Infrastructure network, including Stadt Moers Park and the Alt Corridor

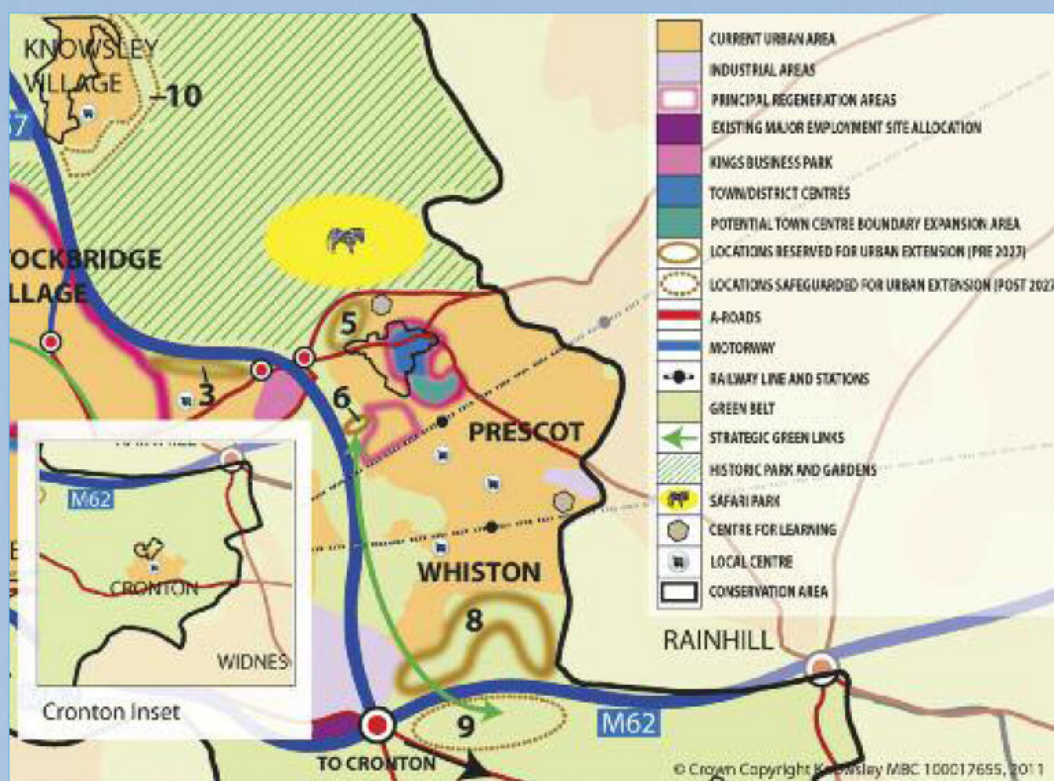
Kirkby



Area priorities

- To improve the quality, choice and affordability of housing including housing-led regeneration within Tower Hill, and further appropriate regeneration in Northwood, Westvale and Southdene
- To maximise the employment role of Knowsley Industrial Park and Business Park
- To review the green belt boundary to meet long term development needs at:
 - land at Bank Lane (for housing) (1); and
 - land to the east of Knowsley Industrial Park (for employment uses) (2)
- Develop Kirkby Town Centre, including phased expansion to the south, to provide high quality shopping, recreation, employment, education and leisure facilities
- To enhance road and public transport links between residential neighbourhoods and Kirkby Town Centre and Knowsley Industrial Park, and between Kirkby and surrounding areas
- To improve the quality and accessibility of Kirkby's open spaces, including the Valley Corridor strategic green link

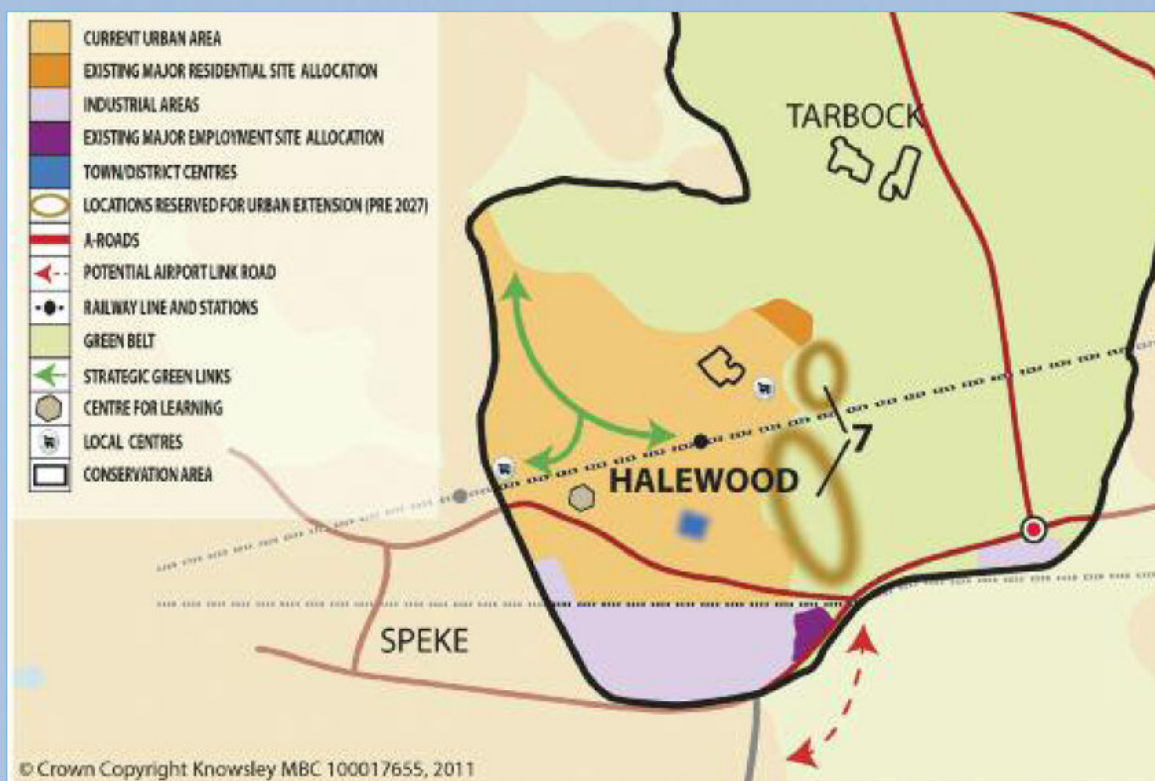
Prescot, Whiston, Cronton and Knowsley Village



Area priorities

- To regenerate Prescot Town Centre, including an improved mix of retail, services and facilities, and provide better links to Cables Retail Park
- To capitalise on the area's unique heritage and historic assets, particularly within Prescot Town Centre, Cronton and Knowsley Village
- To provide new housing to meet local needs, including significant development potential at South Prescot
- To review the green belt boundary to meet long term development needs at:
 - land bounded by the A58, to the north west of Prescot (for housing) (5);
 - land to the South of Carr Lane, to the west of Prescot (for employment uses) (6);
 - land to the south of Whiston (for housing) (8);
 - land at Knowsley Village (for housing, after 2027) (10); and
 - Cronton Colliery and adjacent land south of the M62 (for employment uses after 2027) (9)
- To enhance links between individual communities, facilities and job opportunities within Prescot and the wider area
- To improve the quantity, quality and accessibility of open spaces, including the Whiston to Cronton green link and Stadt Moers Park
- To recognise the historic and recreational significance of the Knowsley Hall Estate and Knowsley Safari Park

Halewood



Area priorities

- To provide an appropriate range of new residential development within Halewood, including affordable housing
- To safeguard existing employment areas, including the regionally significant Jaguar Land Rover plant
- To review the green belt boundary to meet long term development needs for housing at two locations to the east of Halewood (7)
- To redevelop and enhance Raven Court District Centre as the focal point for Halewood, including appropriate retail facilities, community service provision and a public transport interchange
- To enhance connections between Halewood's housing areas and employment opportunities within Knowsley and the wider Liverpool City Region
- To support the expansion of Liverpool John Lennon Airport, including the proposed Eastern Access Transport Corridor
- To improve the quantity, quality and/or accessibility of existing local green space including the Halewood Triangle strategic green link
- To protect and enhance valuable rural landscapes, including the rural settlement of Tarbock Village, and the area's historic built heritage

How can I submit my views?

All comments must be submitted to the council in writing.

You can use the tear-off response form attached to this brochure.

You can use the online form at www.knowsley.gov.uk/LDF.

You can write to us using the contact details on the next page.

Please contact us if you require information in any other formats or if you need any assistance in submitting your views.

How can I find out more?

Come along to one of our drop in events at:

Prescot town centre, Eccleston Street
Saturday July 2 and Tuesday July 26

Kirkby town centre, Newtown Gardens
Tuesday July 5 and Saturday August 6

Huyton town centre, Derby Road
Friday July 8 and Saturday August 13

The Halewood Centre, Raven Court
Friday July 15 and Saturday August 20

Please call 0151 443 2326 or see www.knowsley.gov.uk/LDF for more information about these events and to confirm dates and locations.

Further information

You can view a copy of the full **Preferred Options** report and supporting materials between 27 June 2011 and 5 September 2011, at all council one stop shops and libraries, during normal opening hours.

Information about frequently asked questions, as well as a comprehensive glossary of specialist terms, will also be available.

Alternatively, you can see the full **Preferred Options** report and supporting materials and submit your comments online at www.knowsley.gov.uk/LDF.

Contact Us

Speak to us on 0151 443 2326

TypeTalk 18001 0151 443 2326

Email us at ldf@knowsley.gov.uk

Places and Neighbourhoods Manager,
Chief Executive's Directorate,
Knowsley Council, Archway Road,
Huyton, Knowsley, Merseyside, L36 9YU.
(Postage required)

Facebook - search for Help plan Knowsley!

**All comments must reach us by 5pm
Monday 5 September 2011.**



What happens next?

We will carefully consider all comments and views received, other evidence and Government requirements and prepare a final version of the Core Strategy, known as the Proposed Submission Version.

This document will be the final version of the plan which the council will be seeking to submit to the Government and eventually adopt. There will be a further opportunity to share your views at this stage, although the consultation will be relatively limited in accordance with Government regulations. Following an Examination in Public, the council will seek to adopt the Core Strategy in late 2012.

Please keep checking www.knowsley.gov.uk/LDF for regular updates on Core Strategy progress. You can register your contact details online to receive future updates.

Publication/
consultation on
final Core Strategy

Early 2012

Submission to
Government

**Early/mid
2012**

Examination in Public
by Government Inspector

Late 2012

Adoption of
Final Plan

Late 2012

All mapping is reproduced from the Ordnance Survey material with the permission of the controller of Her Majesty's Stationary Office Crown © Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Knowsley MBC 100017655, 2011



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

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



Designed by Knowsley Communications.
Copyright © 2011 Metropolitan Borough of Knowsley

Tell us what you think

Please fill in this form and return your comments to us, or you can do this online at www.knowsley.gov.uk/LDF

Please return your comments by **5pm on Monday 5 September 2011**. Thank you.

On the whole, do you agree with the proposals set out in this leaflet? YES / NO

What are your overall thoughts on the proposals?

.....
.....
.....

If you would like to comment on a specific area, please tell us which one: (delete as appropriate)

Huyton and Stockbridge Village / Kirkby / Prescott, Whiston, Cronton and Knowsley Village / Halewood

What do you like about plans for this area?

.....
.....
.....

What do you dislike about plans for this area?

.....
.....
.....

Any other comments?

.....
.....
.....



Thank you for your comments, they will be taken into account by the council as it prepares the next stage in this plan.

Business Reply Plus
Licence Number
RSHC-XKCL-KBEJ



Places and Neighbourhoods Manager
Chief Executive's Directorate
Knowsley Council
Municipal Buildings
Archway Road Huyton
Liverpool
L36 9UX

Appendix D – Standard Preferred Options Presentation



Knowsley Local Development Framework update

**Presentation to Knowsley Parish Council
21st July 2011**



The future is **Knowsley**



Structure of Presentation

1. Update on progress
2. National/regional context
3. Borough-wide issues – e.g. housing, employment, the environment
4. Issues in Knowsley Village and nearby areas
4. Next steps up to adoption (late 2012)



The future is **Knowsley**



LDF Core Strategy – Timetable

- Broad strategy only – further detail in other LDF documents
- **Preferred Options Report – consultation from 27 June to 5 September 2011**
- Publication/submission to Secretary of State – Early 2012
- Examination in public – Mid 2012
- Adoption - End 2012



The future is Knowsley



National/regional context

- Fundamental review of national policy framework
- Localism Bill proposes:
 - abolition of Regional Spatial Strategy (RSS) – need to set own housing/employment targets
 - powers for Town/Parish Councils and other groups to prepare new “neighbourhood plans”
- Neighbouring authority LDFs – varying stages
- Liverpool City Region – joint working e.g. on evidence base



The future is Knowsley



Regeneration Priorities

- North Huyton and Stockbridge Village
- Kirkby Town Centre
- Tower Hill, Kirkby
- Knowsley Industrial and Business Parks
- Prescot Town Centre
- South Prescot

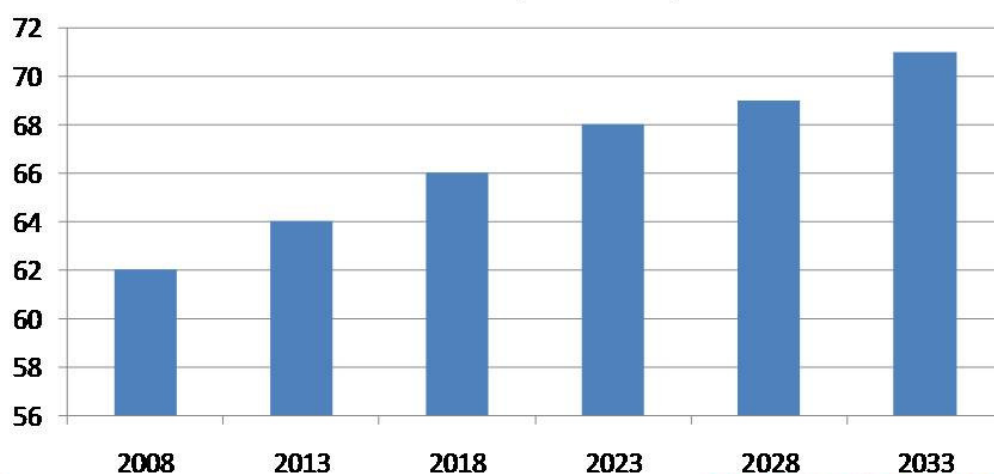


The future is Knowsley



Household projections – Knowsley

Household projections - CLG
2008 – 2033 (thousands)



The future is Knowsley



Proposed housing policies

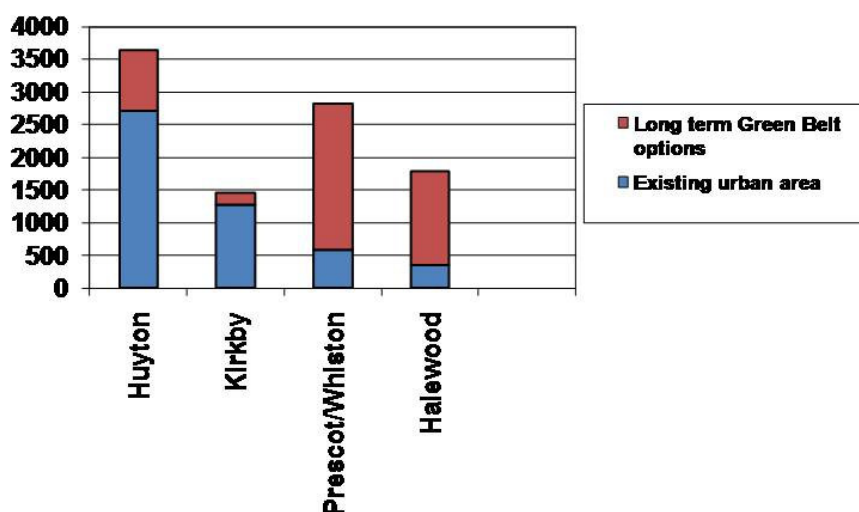
- Recommended target - 450 net completions per year (=7,650 total) from 2010 – 2027
- Phased land release – early focus on urban regeneration/post ca. 2018 Green Belt release
- Up to 25% affordable housing subject to viability
- Broad mix of market housing proposed (2/4 bed)
- Focus on 2 bed for affordable provision
- Meet needs of ageing population e.g. Lifetime Homes



The future is Knowsley 



Distribution of new housing – 2010 to 2027



The future is Knowsley 



Proposed employment policies

- Focus on enhancement e.g. **Knowsley Industrial Park**
- **Phased release of land** – existing urban areas first/longer term Green Belt opportunities
- Revised target – **40-80 hectares new land up to 2027** based on historic build rate
- Focus on **improved transport links** – e.g. within Knowsley and to Liverpool city centre, Gilmoor, Speke/Garston
- Employability/new start ups e.g. **Managed workspace**



The future is **Knowsley**



Town centre policies

- All town centres – better all round “offer” – evening economy, public realm, leisure etc.
- **Comparison shopping** - up to ca 66,000 sq. metres additional 2008-26 (distributed ca 60% Kirkby; remainder to other centres according to appropriate scale/development opportunities/need)
- **Food shopping** - gaps to be addressed e.g. Kirkby, Halewood, Stockbridge Village
- **Smaller shopping centres/parades** – retain but rationalise provision/encourage re-development in some centres



The future is **Knowsley**



Choosing locations for changing Green Belt

Locations should :

- be where **development is needed**
- protect **strategic gaps** between towns
- form **logical extensions** to the urban area
- be **sustainable** e.g. near to services and public transport
- be based on evidence (the Knowsley and Sefton Green Belt study)



The future is Knowsley



Provisional locations for Green Belt growth

- Precise timing dependent on rate of development in urban area

<u>Location</u>	<u>Use</u>	<u>Timescale (approx.)</u>
1. Bank Lane, Kirkby	Housing	2018 - 2027
2. East Lancs Road, east of KIP	Employment	“ “
3. <u>Land to north of Huyton (adj. M57)</u>	<u>Housing/employment</u>	“ “
4. Land south of Bowering Park estate, Huyton	Housing	“ “
5. Land between A58 and Prescot bypass	Housing	“ “
6. Carr Lane, Prescot	Employment	“ “
7. Land east of Halewood (two locations)	Housing	“ “
8. Halsnead Park, Whiston	Housing	“ “
9. Cronton Colliery	Employment	Post 2027
10. <u>Knowsley Village</u>	<u>Housing</u>	Post 2027



The future is Knowsley





Other Issues

- **Design Quality** –Development with a long shelf life.
- **Greenspaces** –network and key linkages with focus on quality rather than quantity
- **Climate change** – carbon compensation fund, sustainable building standards e.g. Code for Sustainable Homes
- **Gypsies and travellers** – proposed site criteria
- **Infrastructure Delivery Plan** – the “what”, “where”, “when” and “by whom”
- **Developer contributions/Community Infrastructure Levy** – review based on new government approach



The future is Knowsley



Have your say

- Consultation is open until 5 September
- Materials are available online and at Council One Stop Shops and libraries
- Leaflets posted to all households
- 8 “drop in” events in town centres over the summer
- Responses must be submitted in writing, online, via email or by post
- All responses will be compiled in a Report of Consultation and carefully considered
- Next steps as slide 3



The future is Knowsley



Contact Us

Website: www.knowsley.gov.uk/LDF
Email: ldf@knowsley.gov.uk
Phone: 0151 443 2326
Address: Policy, Impact and Intelligence Division,
Chief Executive's Directorate
Municipal Buildings
Archway Road
Huyton L36 9YU



The future is Knowsley

Appendix E: Full List of Respondents

Letter / Email Ref	Consultee	Agent?	Duplicate?	Objective Consultee ID	Objective Comment Reference	Date Input into Objective
Letters						
POLT1	Mr Peter Davis			587093	PO308 - PO312	05/10/2011
POLT2	Mrs Joan Fitzsimmons			560019	PO264	19/09/2011
POLT3	Mrs IG Davis			587123	PO313 - PO314	05/10/2011
POLT4	Mr P R Davis			587093	PO315	05/10/2011
POLT5	Mr P R Bate			587093	PO263	19/09/2011
POLT6	John Lawday			587134	PO316	05/10/2011
POLT7	Mrs Lawday			588811	PO272	19/09/2011
POLT8	Edward Bean	(Roman Summer Associates Ltd)	Email POE68			
POLT9	Miss H M Flute			587138	PO317	05/10/2011
POLT10	Knowsley Multi Faith and Belief Working Group (Laura Jenkinson)		Email POE5			
POLT11	Petition to KMBC		Petition POP5			
POLT12	Barry Nelson			587150	PO318	05/10/2011
POLT13	Mr Mike Townson			587152	PO319	05/10/2011
POLT14	Mr L Seagreaves			587158	PO320	05/10/2011
POLT15	Barry Nelson			587150	PO321 - PO322	05/10/2011
POLT16	Mr Robert Watkin			587162	PO323	05/10/2011
POLT17	Mr C Rowe			587165	PO324	05/10/2011
POLT18	Halewood Town Council		Email POE9			

	(John Green)					
POLT19	Dr Allan Richardson			587169	PO324 - PO325	05/10/2011
POLT20	A G Edwards			587215	PO327	06/10/2011
POLT21	Cronton Parish Council (Vitti Osbourne)			370882	PO329 - PO331	
POLT22	Rainhill Civic Society (JM Carter)			587216	PO271 & PO328	19/09/2011 & 06/10/2011
POLT23	Mr Charles Daly			548617	PO332 - PO333	06/10/2011
POLT24	Lancashire County Council (Marcus Hudson)			560008	PO261 - PO262	19/09/2011
POLT25	Ms J Bennett			560023	PO265 - PO269	19/09/2011
POLT26	Mr David Kent			587220	PO334 - PO335	06/10/2011
POLT27	Mr T W Bretherton			587223	PO336 - PO338	06/10/2011
POLT28	Mrs Sandra Jaycock			372072	PO339	06/10/2011
POLT29	Mrs C Peers			587226	PO340	06/10/2011
POLT30	Mr C Rowe			587165	PO341	06/10/2011
POLT31	Mrs C Peers			587226	PO342 - PO343	06/10/2011
POLT32	Homes and Communities Agency (Christine Duffin)		Email POE24			
POLT33	Mrs C Connaughton and Kathleen Whitfield			587231	PO346	06/10/2011
POLT34	Gerard Halliday			587234	PO345	06/10/2011
POLT35	Mr Robert Watkin			587162	PO344 & PO347	06/10/2011
POLT36	Mr P R Davis			587093	PO348 & PO349	06/10/2011
POLT37	Mr J Woollam			587239	PO350	06/10/2011
POLT38	Mr & Mrs R Smith			587241	PO351	06/10/2011
POLT39	Jason Brown			584247	PO293	19/09/2011
POLT40	Nicola Meredith			587242	PO352 - PO353	06/10/2011

POLT41	Ms P M Meredith			587248	PO354 - PO355	06/10/2011
POLT42	Knowsley Constituency Liberal Democrats - Kirkby Branch (Carl Cashman)			559304	PO275 - PO292	19/09/2011
POLT43	Moya Clark			560038	PO270	19/09/2011
POLT44	Dr Allan Richardson			587169	PO356 - PO357	06/10/2011
POLT45	Mrs N Haynes & Mrs L Bending			587256 & 587259	PO358 - PO361	06/10/2011
POLT46	Cllr Ian Smith, Leader of the Opposition Knowsley MBC			371187	PO362 - PO363	06/10/2011
POLT47	Age UK Knowsley (David Aspin)			408207	PO364 - PO372	06/10/2011
POLT48	The Stanley Estate and Stud (M J Harker)		Email POE26			
POLT49	1st 4 Kirkby (A Barton)			559985	PO249 - PO254	19/09/2011
POLT 50	Kirkby Resident Actions Group (John Fleming)			559995	PO255 - PO260	19/09/2011
POLT51	Women for Kirkby's Future (Jenny Wharton)			560061	PO273 - PO274	19/09/2011
POLT52	John Webster			408079	PO373	06/10/2011
POLT 53	Petition to KMBC, Lead Name - John Webster, Bowring Residents Association Executive Founder Member		Petition - POP6			
POLT 54	Petition to KMBC, Lead Name - John Webster		Petition POP4			
POLT55	Whiston Petition		Petition POP2			

POLT56	Knowsley Lane Petition		Petition POP1			
POLT57	Knowsley Development Fund and Amalcroft Properties Ltd	(Gerald Eve)	Emails POE61 - 66			
POLT58	United Utilities	(Cass Associates)	Email POE27			
POLT59	United Utilities	(Cass Associates)	Email POE55			
POLT60	Redrow	(HOW Planning)	Email POE43			
POLT 61	The Peel Group (Nicholas Milner)		Email POE53			
POLT62	Taylor Wimpey UK (Andrew Thorley)	(Vincent Ryan, Barton Willmore)	Email POE67			
POLT63	Merseytravel (Neil Scales)		Email POE46			
POLT64	Orbit Investments	(Emerson Group)	Email POE50			
POLT65	English Heritage (Judith Nelson)		Email POE44			
POLT67	Cllr Ian Smith, Leader of the Opposition, Knowsley MBC			371187	PO3 - PO5	16/08/2011
Emails						
POE1	Raymond Devers			588326	PO374	11/10/2011
POE2	P R Davis			587093	PO375 - PO377	11/10/2011
POE3	Sandra Jaycock			372072	PO378	11/10/2011
POE4	David and Valerie Forster			543245	PO379	11/10/2011

POE5	Knowsley Multi Faith and Belief Working Group (Laura Jenkinson)			588334	PO380	11/10/2011
POE6	Network Rail (Diane Clarke)			588337	PO381 - PO382	11/10/2011
POE7	Robert Arnall			588343	PO383	11/10/2011
POE8	Adrian Jones			558995	PO91	12/09/2011
POE9	Halewood Town Council (John Green)			370893	PO384 - PO385	11/10/2011
POE10	Mr Graham Moorcroft			588347	PO386 - PO390	11/10/2011
POE11	Miss R McGowan			558998	PO92	12/09/2011
POE12	Paul Forshaw			588351	PO391	11/10/2011
POE13	Mrs N Griffiths			599001	PO93 - PO100	12/09/2011
POE14	Ray Davies (Peter R Davis)			587093	PO392 - PO393	11/10/2011
POE15	Graham Schlueter			588360	PO394 - PO395	11/10/2011
POE16	Theatres Trust (Rose Freeman)			400832	PO101 - PO104	12/09/2011
POE17	Natural England (Janet Baguley)			371683	PO105 - PO128	12/09/2011
POE18	Wirral MBC (Hannah Whitfield)			588363	PO396	11/10/2011
POE19	LMC Associates Ltd (Neil Lancaster)			588364	PO397	11/10/2011
POE20	Ray Davis			587093	PO398 - PO401	11/10/2011
POE21	Sefton MBC (Tom Hatfield)			588368	PO402 - PO406	11/10/2011
POE22	Marie Reeve			559016	PO129 - PO130	12/09/2011
POE23	Mr J Steven			559017	PO131	12/09/2011

POE24	Homes and Communities Agency (Christine Duffin)			588372	PO407 - PO439	12/10/2011
POE25	National Trust (Alan Hubbard)			419883	PO132 - PO144	12/09/2011
POE26	The Stanley Estate and Stud (M J Harker)			370883	PO300 - PO306	21/09/2011
POE27	United Utilities	(Cass Associates)		370943	PO491 - PO495	13/10/2011
POE28	Spennithorne Regeneration Ltd	(Nathaniel Lichfield and Partners)		559025	PO145 - PO155	12/09/2011
POE29	N Patten			588373	PO440 - PO441	12/10/2011
POE30	R Arnall			588343	PO442	12/10/2011
POE31	Merseyside Environmental Advisory Service (Jermaine Daniels)			370886	PO156 - PO176 & PO666 - 711	14/09/2011
POE32	United Utilities and Weston House	(Baker Associates and Cass Associates)		370943 & 545201	(UU 370943) PO593 - PO615; (WH 545201) PO616 - PO636	18/10/2011
POE33	Stronston Ltd	(The Planning Studio Ltd)		584313	PO307	21/09/2011
POE34	David Holmes			588375	PO443 - PO446	12/10/2011
POE35	Debby Murphy			588376	PO447	12/10/2011
POE36	C Harmer			588379	PO448	12/10/2011
POE37	D Smithson			588380	PO449 - PO453	12/10/2011
POE38	Halton BC (Alasdair Cross)			588381	PO454 - PO460	12/10/2011
POE39	Remondis UK Ltd	(Environmental Compliance Ltd)		588564	PO461 - PO465	12/10/2011
POE40	Grosvenor Liverpool Fund	(Drivers Jonas Deloitte)		371422	PO177 - PO183	14/09/2011

POE41	NV Assets LLP	(Steven Abbott Associates)		382179	PO184 - PO191	14/09/2011
POE42	Highways Agency (Simon Clarke)			588426	PO514 - PO521	14/10/2011
POE43	Redrow Homes NW	(HOW Planning)		457367	PO496 - PO513 & PO536 - PO547	14/10/2011
POE44	English Heritage (Judith Nelson)			370871	PO192 - PO205	14/09/2011
POE45	Redrow Homes NW Lancashire (Robin Buckley)			389989	PO490 & PO548 - PO554	14/10/2011
POE46	Merseytravel (Neil Scales)			588428	PO466 - PO476	12/10/2011
POE47	Liverpool City Council (Mike Eccles)			370920	PO206 - PO215	14/09/2011
POE48	John Benn			588432	PO477	12/10/2011
POE49	Knowsley Constituency Liberal Democrats - Kirkby Branch (Carl Cashman)			559304	PO216	14/09/2011
POE50	Orbit Investments	(Emerson Group)		397095	PO637 - PO639	19/10/2011
POE51	Environment Agency (Dawn Hewitt)			370989	PO217 - PO229	14/09/2011
POE52	Spencer Industrial Estates Ltd	(GVA Grimley)		588436	PO478 - PO484	12/10/2011
POE53	The Peel Group (Nicholas Milner)			588438	PO522 - PO535	14/10/2011
POE54	Friends, Families and Travellers and Traveller Law Reform Project			370723	PO485	12/10/2011

	(Steve Staines)					
POE55	United Utilities	(Cass Associates)		370943	PO555 - PO563	14/10/2011
POE56	Junction Property Ltd	(Barton Willmore)		588785	PO564 - PO576	14/10/2011
POE57	Whiston Town Council (Sandra Mayers)			370892	PO294 - PO296	21/09/2011
POE58	Jones Lang LaSalle (Andy Frost)			370980	PO297 & PO486 - PO489	13/10/2011
POE59	Sport England (Paul Daly)			389928	PO230 - PO247	14/09/2011
POE60	Barratt Homes	(Turley Associates)		588440	PO640 - PO650	19/10/2011
POE61	Knowsley Development Trust and Amalcroft Properties Ltd	(Gerald Eve)		588781 & 383054	(KDT 588781) PO577; (AP 383054) PO578	17/10/2011
POE62	Knowsley Development Trust and Amalcroft Properties Ltd	(Gerald Eve)		588781 & 383054	(KDT 588781) PO579 - PO580; (AP 383054) PO581 - PO582	17/10/2011
POE63	Knowsley Development Trust and Amalcroft Properties Ltd	(Gerald Eve)		588781 & 383054	(KDT 588781) PO583; (AP 383054) PO584	17/10/2011
POE64	Knowsley Development Trust and Amalcroft Properties Ltd	(Gerald Eve)		588781 & 383054	(KDT 588781) PO585 - PO586; (AP 383054) PO587 - PO588	17/10/2011
POE65	Knowsley Development Trust and Amalcroft Properties Ltd	(Gerald Eve)		588781 & 383054	(KDT 588781) - PO589; (AP 383054) - PO590	17/10/2011

POE66	Knowsley Development Trust and Amalcroft Properties Ltd	(Gerald Eve)		588781 & 383054	(KDT 588781) - PO591; (AP 383054) - PO592	17/10/2011
POE67	Taylor Wimpey UK	(Barton Willmore)		485368	PO651 - PO665	19/10/2011
POE68	Edward Bean	(Roman Summer Associates Ltd)		584280	PO299	21/09/2011
POE69	The Land Trust (Russell Mills)			559359	PO248	14/09/2011

Appendix F – Web Link to Report of Consultation (Objective)

The below link is to the full Report of Consultation, as hosted on the Council's web consultation portal, using Objective software.

<http://consult.knowsley.gov.uk/portal>

It is possible to view all of the full, detailed comments submitted on the Preferred Options Report, as submitted online, by email and by letter.