



*Knowsley Council*

# **Knowsley Local Plan: Core Strategy**

**Proposed Modifications Consultation**

**Report of Representations - Volume 1**

December 2014

## Contents

<b>VOLUME</b>	<b>CHAPTER</b>	<b>CONTENTS</b>
1	00	INTRODUCTION
1	01	NO COMMENT
1	02	CONSULTATION
1	03	DUTY TO COOPERATE
1	04	POLICY CS1
1	05	POLICY CS2
2	06	POLICY CS3 TARGET
3	07	POLICY CS3 SUPPLY
4	08	POLICY CS4 TARGET
4	09	POLICY CS4 SUPPLY
4	10	POLICY CS5
4	11	POLICY CS6
4	12	POLICY CS7
4	13	POLICY CS8
4	14	POLICY CS11
4	15	POLICY CS14
4	16	PWCKV AREA
5	17	SUE GENERAL
6	18	BANK LANE
6	19	EAST OF KIP
6	20	KNOWSLEY LANE
6	21	EDENHURST
6	22	A58 PRESCOT
6	23	CARR LANE
6	24	HALEWOOD
6/7	25	SOUTH WHISTON & M62
8	26	KNOWSLEY VILLAGE
8	27	OTHER SITE
8	28	POLICY CS15
8	29	POLICY CS17
8	30	POLICY CS20
8	31	POLICY CS21
8	32	POLICY CS22
8	33	POLICY CS24
8	34	POLICY CS25
8	35	POLICY CS27
8	36	APPENDIX D
8	37	SUSTAINABILITY APPRAISAL
8	38	NO COMMENT
8	39	LATE REPRESENTATIONS

## **00 INTRODUCTION**

This Report of Representations presents each of the representations submitted to Knowsley Council during the period of public consultation on its Local Plan: Core Strategy, Proposed Modifications, which took place during Autumn 2014.

This Report has been compiled for reference by all stakeholders who have an interest in the Knowsley: Local Plan Core Strategy including the Inspector appointed to examine the Plan and representors who responded to the consultation. Due to file size and length, this report includes several volumes. The contents of each volume are set out in the Contents page of this report.

Further information about the Proposed Modifications consultation is available within a separate Report of Consultation published by the Council.

### **0.1 Representor IDs**

Each individual or organisation which responded to the consultation has been issued a representor identification number (ID). Where the representor has previously responded to consultation on the Knowsley Local Plan Core Strategy (i.e. during the Proposed Submission consultation in Autumn 2012), the same representor number has been given. For “new” representors, that is those who did not respond at that earlier stage, a new ID has been assigned. (NB. The new IDs commence at ID 121, given that IDs 1-120 were assigned at the Proposed Submission stage).

### **0.2 Multiple Representations**

Some representors submitted more than one response to the consultation. Where this is the case, a number of representations are assigned to that representor, followed by a number, for example, A Smith (1), A Smith (2), A Smith (3).

### **0.3 Duplicate Representations**

Some representors submitted representations which were identical to those submitted by others. In this case, these have been grouped together. Examples include the multiple copies of standard forms and letters received from residents of the Knowsley Village area. These have been grouped together as a single representation, but with the number of representors who have submitted that representation identified. In other cases, the Council has noted smaller groups of individuals submitting identical responses. So that these do not appear multiple times within this report, these have also been grouped together and clearly labelled.

### **0.4 Petitions**

The Council received a number of petitions in response to the consultation. These have been logged as a representation against the individual stated as lead petitioner, or where there is no lead petitioner clearly identified, logged as a specific response e.g. “Whiston Petition”. In all cases, the number of signatures is stated in brackets, e.g. N Jones, Petition (45).

## 0.5 Coding Representations

The Report lists each of the representations submitted, in terms of the part of the Local Plan Core Strategy to which they relate. In some cases, representors clearly labelled their representations to indicate this; in other cases, the Report assigns the representation to different issues based on the Council's interpretation of the content of the representation. In many cases, representations relate to more than one part of the Plan.

Index 1 below shows the way in which the Council has allocated these representations, based on broad issues of plan preparation, such as consultation, different parts of the Plan, such as individual policies or proposed Sustainable Urban Extension sites, or supporting documents such as the Sustainability Appraisal. It identifies where the issue raised relates to a Main Modification as opposed to a part of the Plan which has not changed (see section 0.6 below).

The "Reference Numbers" column is the reference given to each unique representation relating to each issue or part of the Plan. The "total" column reflects the total number of submissions for each issue / part of the Plan. This is more than indicated by the reference numbers column in some cases as some representations were duplicated.

## 0.6 Identifying issues raised which relate to "Main Modifications"

The consultation in Autumn 2014 was on the Proposed Modifications to the Local Plan: Core Strategy. It is therefore important to understand which issues raised relate to the Proposed Modifications as opposed to parts of the Plan which have not been subject to any changes. The "Index 1" table indicates which issue or parts of the Plan have been subject to the Council's Proposed Main Modifications, and any relevant Main Modification reference number<sup>1</sup>. This table identifies that the following issues which were raised in the representations do not apply to one of the Main Modifications:

- Consultation
- "Duty to cooperate"
- Policy CS3 - Housing Target
- Sustainability Appraisal
- Habitats Regulation Assessment

The "Index 2" table identifies the issues or parts of the Plan to which each representation relates. Where these relate to one of the issues listed above it means that the issue raised does not relate directly to the wording of a Main Modification.

## 0.7 Presenting Chapters

Each issue or part of the Plan has been assigned an individual chapter within this Report of Representations, indicated within Index 1. Each of these chapters includes

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<sup>1</sup> Sourced from the Knowsley Local Plan: Core Strategy – Schedule of Proposed Modifications, September 2014

a cover sheet, which lists the representations containing matters relating to the chapter. The cover sheets show the number of unique representations (numbered 001 and onwards), as well as the number, IDs and names of the representors who submitted the representation.

Each representation is presented in full, and is labelled with the relevant references at the top of the first page of the representation. This includes the representation reference, e.g. CONSULTATION 002, and the relevant ID number or numbers of those relevant representors.

## **0.8 Representations by Representor**

Index 2 sets out each individual representor, listed by ID number. This then shows the name and where relevant organisation of the representor, followed by a list of the issues or parts of the Plan that their representation has been assigned to. It is anticipated that this Index will be helpful for representors, seeking to find out how their representation has been presented within this report.

## **0.9 Late Representations**

The Council received a number of representations after the conclusion of the consultation period (at 12 noon on Friday 14 November, 2014). These have been treated as late representations and therefore have not been included within the main body of this Report. They have not been given representation references or allocated to any specific representor ID. They are presented at Chapter 39 of this Report, for information only.

**Index 1 – Assigning Representations to Relevant Issues / Parts of the Plan**

<b>Chapter</b>	<b>Issue / Part of the Plan</b>	<b>Main Modifications Reference</b>	<b>Reference Codes / Chapter Title</b>	<b>Ref Numbers</b>	<b>Total</b>
01	Responses without comments	n/a	NO COMMENT	001 – 002	2
02	Consultation	n/a	CONSULTATION	001 – 144	1064
03	Duty to Cooperate	n/a	DUTY TO COOPERATE	001 – 007	16
04	Policy CS1 Spatial Strategy for Knowsley	M042 – M043	POLICY CS1	001 – 003	3
05	Policy CS2 Development Principles	M048 – M050	POLICY CS2	001	1
06	Policy CS3 - Housing Target	n/a	POLICY CS3 TARGET	001 – 154	1073
07	Policy CS3 - Housing Supply	M055	POLICY CS3 SUPPLY	001 – 257	1805
08	Policy CS4 - Employment Land Target	M063	POLICY CS4 TARGET	001 – 019	21
09	Policy CS4 - Employment Land Supply	M064 – M066	POLICY CS4 SUPPLY	001 – 083	87
10	Policy CS5 Green Belt	M076 – M078	POLICY CS5	001 – 002	2
11	Policy CS6 Town Centres and Retail Strategy	M102 – M103	POLICY CS6	001 – 004	4
12	Policy CS7 Transport Networks	M112 – M113	POLICY CS7	001 – 002	2
13	Policy CS8 Green Infrastructure	M117 – M123	POLICY CS8	001 – 003	31
14	Policy CS11 Principal Regeneration Area – Knowsley Industrial and Business Parks	M150 – M151	POLICY CS11	001	1
15	Policy CS14 Principal Regeneration Area – Prescott Town Centre	M162 – M163	POLICY CS14	001	1
16	PWCKV Area Priorities	M157	PWCKV AREA	001	1
17	Chapter 6A – SUEs General	M168	SUE GENERAL	001 – 186	204
<b>Chapter 6A – SUEs Site Specific</b>					
18	Bank Lane, Kirkby	M168	BANK LANE	001 – 002	2
19	East of Knowsley Industrial and Business Parks, Kirkby	M168	EAST OF KIP	001 – 005	5
20	Knowsley Lane, Huyton	M168	KNOWSLEY	001 – 028	31

Chapter	Issue / Part of the Plan	Main Modifications Reference	Reference Codes / Chapter Title	Ref Numbers	Total
			LANE		
21	Edenhurst Avenue, Huyton	M168	EDENHURST	001 – 029	31
22	Land bounded by A58, Prescot	M168	A58 PRESCOT	001 – 028	32
23	Carr Lane, Prescot	M168	CARR LANE	001 – 012	14
24	East of Halewood	M168	HALEWOOD	001 – 027	30
25	South of Whiston and Land South of the M62	M168	SOUTH WHISTON & M62	001 – 339	357
26	Land at Knowsley Village	M168	KNOWSLEY VILLAGE	001 – 070	1602
27	Alternative / Other sites	M168	OTHER SITE	001 – 005	5
28	Policy CS15 Affordable Housing	M169 – M170	POLICY CS15	001 – 011	12
29	Policy CS17 Housing Sizes and Design Standards	M179	POLICY CS17	001	1
30	Policy CS20 Managing the Borough's Historic Environment	M193 – M194	POLICY CS20	001	1
31	Policy CS21 Greenspaces and Trees	M198 – M202	POLICY CS21	001	1
32	Policy CS22 Sustainable and Low Carbon Development	M207 – M215	POLICY CS22	001 – 008	12
33	Policy CS24 Managing Flood Risk	M221	POLICY CS24	001 – 010	13
34	Policy CS25 Management of Mineral Resources	M225	POLICY CS25	001	1
35	Policy CS27 Planning and Paying for New Infrastructure	M231 – M237	POLICY CS27	001 - 005	5
36	Appendix D – Policy Delivery Mechanisms	M271	APPENDIX D	001	1
37	Sustainability Appraisal	n/a	SUSTAINABILITY APPRAISAL	001 – 021	28
38	Habitats Regulations Assessment	n/a	HRA	001 – 004	4

**Index 2 – Assigning Issues Raised to Individual Representors**

<b>ID</b>	<b>Name</b>	<b>Organisation</b>	<b>Issues Raised</b>
1	Angela Gemmill	Marine Management Organisation	NO COMMENT
5	Paul Slater (1)	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, HALEWOOD, KNOWSLEY VILLAGE
5	Paul Slater (2)	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, HALEWOOD, KNOWSLEY VILLAGE
6	Philip Grant (1)	How Planning for Persimmon Homes	KNOWSLEY LANE
6	Philip Grant (2)	How Planning for Persimmon Homes	KNOWSLEY LANE
7	Vitti Osbourne	Cronton Parish Council	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
11	Kate Wheeler	Natural England	POLICY CS8, HRA
15	George Mackenzie	Halewood Town Council	POLICY CS3 SUPPLY, POLICY CS3, HALEWOOD
17	Edward Bean	None	POLICY CS4 SUPPLY, OTHER SITE
18	Jason Brown	Whiston Green Belt Action Group	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
19	Mr and Mrs Brindle	None	SOUTH WHISTON & M62
21 / 80	Peter Monaghan (1)	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
21 / 80	Peter Monaghan (2)	None	SOUTH WHISTON & M62
21 / 80	Peter Monaghan (3)	None	SOUTH WHISTON & M62
22	Wendy Moran	None	CONSULTATION, POLICY CS3 SUPPLY, SOUTH WHISTON & M62
23	Patricia Todhunter	None	CONSULTATION, SOUTH WHISTON & M62
23	Robin Todhunter	None	CONSULTATION, SOUTH WHISTON & M62
24	Alison Garnett	None	SUE GENERAL, SOUTH WHISTON & M62
27	Maurice Steele	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
28	D Kent (1)	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
28	D Kent (2)	None	SOUTH WHISTON & M62
28	David Kent	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62



<b>ID</b>	<b>Name</b>	<b>Organisation</b>	<b>Issues Raised</b>
31	Amanda Brown	None	SOUTH WHISTON & M62
32	Stacey Brown	None	SOUTH WHISTON & M62
32	Daniel Brown	None	SUE GENERAL
33	J Evans	None	SOUTH WHISTON & M62
35	Diane Raven	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
36	Phil Raven	None	SOUTH WHISTON & M62
40	Brenda Wood	None	SOUTH WHISTON & M62
40	John Wood	None	POLICY CS3 TARGET, SOUTH WHISTON & M62
41	Frank Shuker	None	SOUTH WHISTON & M62
42	Robert Fairclough	None	SUE GENERAL
43	Donald McCormack	None	CONSULTATION, SUE GENERAL, SOUTH WHISTON & M62
44	M McMahan	None	SOUTH WHISTON & M62
46	Nicola Boyle	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
47	John Brackley	None	SOUTH WHISTON & M62
47	Patricia Brackley	None	SUE GENERAL
49	Margaret Edwards	None	SOUTH WHISTON & M62,
56	Albert and Madeleine Shiplee	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SOUTH WHISTON & M62
59	Karen Tomlinson	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
62	Janet Gore	None	POLICY CS3 TARGET, POLICY CS4 TARGET, SUE GENERAL, SOUTH WHISTON & M62
62	Lesley O'Hara	None	POLICY CS3 SUPPLY, POLICY CS4 TARGET, SOUTH WHISTON & M62
63	Maurice Brown	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
65	H Pye	None	SUE GENERAL, SOUTH WHISTON & M62
70	Graham Moorcroft (1)	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, EDENHURST AVENUE
70	Graham Moorcroft (2)	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, EDENHURST AVENUE
70	Graham Moorcroft (3)	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, EDENHURST AVENUE
72	Martin Harker	Knowsley Estate	KNOWSLEY VILLAGE
78	Kenneth Dunn	None	SOUTH WHISTON & M62
78	Lesley Dunn	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
79	Berry	None	CONSULTATION, POLICY CS3 SUPPLY, SOUTH WHISTON & M62
79	Gary Berry	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62

<b>ID</b>	<b>Name</b>	<b>Organisation</b>	<b>Issues Raised</b>
79	Sheila Berry	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
84	J M Carter	Rainhill Civic Society	SUE GENERAL
85	Robin Greenway	Robin Greenway and CO for The Hale (Hesketh) Estate	HALEWOOD
86	Cllr Ian Smith (1)	Prescot Town Council, Liberal Democrats Group	CONSULTATION, POLICY CS3 SUPPLY, SUE GENERAL, A58 PRESCOT, CARR LANE
86	Cllr Ian Smith (2)	Knowsley Liberal Democrats	CONSULTATION, POLICY CS3 SUPPLY, SUE GENERAL, A58 PRESCOT, CARR LANE
88	Rachael Bust	The Coal Authority	POLICY CS2, POLICY CS25, SUE GENERAL, SOUTH WHISTON & M62
94	T W Bretherton	None	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS22, POLICY CS24, SUSTAINABILITY APPRAISAL
96	Ray Davis (3)	Whiston Green Belt Action Group	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
96	Ray Davis (1)	Whiston Green Belt Action Group	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 TARGET, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS15, POLICY CS22, SUSTAINABILITY APPRAISAL
96	Ray Davis (4)	Whiston Green Belt Action Group	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 TARGET, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS15, POLICY CS22, SUSTAINABILITY APPRAISAL
96	Ray Davis (2)	Whiston Green Belt Action Group	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL
96	Ray Davis (5)	Whiston Green Belt Action Group	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
99	Romilly Scragg	None	CONSULTATION, SUE GENERAL, SOUTH WHISTON & M62
105	Matthew Dugdale	Emerson Group	POLICY CS11, OTHER SITE, POLICY CS22, POLICY CS27
108	Chris Edge / Michael Courcier	Barton Willmore for Junction Property Ltd	POLICY CS1, POLICY CS3 SUPPLY, POLICY CS3 TARGET, POLICY CS5, POLICY CS7, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS15
112	Debbie King (1)	None	CONSULTATION

<b>ID</b>	<b>Name</b>	<b>Organisation</b>	<b>Issues Raised</b>
112	Debbie King (2)	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
113	Jenny Hope	United Utilities	SUE GENERAL, POLICY CS22, POLICY CS27
114	Paul Daly	Sport England	KNOWSLEY LANE, A58 PRESCOT, SOUTH WHISTON & M62
119	Sian Butt	Pegasus Group for Taylor Wimpey UK	POLICY CS1, POLICY CS3 SUPPLY, SUE GENERAL, EDENHURST AVENUE, POLICY CS15
120	Tony Docherty	Weston House	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, OTHER SITE, POLICY CS27
121	A E Sherlock, Petition (60)	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, KNOWSLEY LANE, A58 PRESCOT, CARR LANE
122	A G Edwards	None	EDENHURST AVENUE
123	A G Wortley	None	POLICY CS3 TARGET, POLICY CS4 TARGET, SUE GENERAL, SOUTH WHISTON & M62
124	A Reid	None	POLICY CS3 SUPPLY, SUE GENERAL
125	A S Davies	None	CONSULTATION, POLICY CS3 SUPPLY, SUE GENERAL, KNOWSLEY LANE, A58 PRESCOT, CARR LANE
126	Ada Whitby	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
127	Adrian Carter	None	CONSULTATION, EDENHURST AVENUE
128	Alan McNab (1)	None	CONSULTATION, DUTY TO COOPERATE - 001, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
128	Alan McNab (2)	None	CONSULTATION, DUTY TO COOPERATE - 002, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M63
129	Alan Quinn	None	SOUTH WHISTON & M62
130	Alan Vearncombe (1)	None	POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
130	Alan Vearncombe (2)	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
131	Alan Woodall	None	SOUTH WHISTON & M62
132	Amanda Fletcher	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
133	Amanda Thompson	None	SUE GENERAL, SOUTH WHISTON & M62
134	Andrea O'Rourke	None	CONSULTATION, POLICY CS3 SUPPLY, SOUTH WHISTON & M62
135	Andrew Anderson	None	SOUTH WHISTON & M62
136	Andrew Burke	None	SOUTH WHISTON & M62
137	Andrew Taylor	None	POLICY CS3 SUPPLY, HALEWOOD

<b>ID</b>	<b>Name</b>	<b>Organisation</b>	<b>Issues Raised</b>
138	Andrew Williams (1)	None	CONSULTATION, KNOWSLEY LANE
138	Andrew Williams (2)	None	CONSULTATION, KNOWSLEY LANE
139	Anita Clift	None	A58 PRESCOT
140	Anita Shaw	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
141	Ann Fairclough	None	SUE GENERAL
142	Ann Murray	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
143	Ann Robertson	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
144	Ann Sinclair	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
145	Anne Gibbons	None	POLICY CS3 TARGET, POLICY CS4 TARGET, SUE GENERAL, SOUTH WHISTON & M62
146	Anne Hannaby	None	SOUTH WHISTON & M62
147	Anne Marie Atherton	None	POLICY CS3 SUPPLY, HALEWOOD
148	Anne Thornton	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
149	B Grady	None	SOUTH WHISTON & M62
150	B Kirkwood (1)	None	CONSULTATION, KNOWSLEY VILLAGE
150	B Kirkwood (2)	None	CONSULTATION, POLICY CS3 TARGET, KNOWSLEY VILLAGE
150	B Kirkwood (3)	None	KNOWSLEY VILLAGE
151	B Moran	None	SOUTH WHISTON & M62
152	Ball	None	SUE GENERAL, SOUTH WHISTON & M62
153	Barbara Anderson	None	CONSULTATION, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
154	Barbara Fazakerley	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
155	Barbara Fleetwood	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
156	Barbara Stephenson	None	POLICY CS4 TARGET, SUE GENERAL, SOUTH WHISTON & M62
157	Barry Lucas	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
158	Barry Worrall, Petition (1003)	None	CONSULTATION, HALEWOOD
159	Beryl Morris (1)	None	SOUTH WHISTON & M62
159	Beryl Morris (2)	None	SOUTH WHISTON & M62
160	Bess Smith	Cronton Pathways Walks for Health	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62

<b>ID</b>	<b>Name</b>	<b>Organisation</b>	<b>Issues Raised</b>
161	Bradley Fowell	None	POLICY CS3 TARGET, SUE GENERAL
162	Brenda Espinola	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
163	Brenda Tilley	None	SOUTH WHISTON & M62
164	Brendan Hughes	None	SOUTH WHISTON & M62
165	Brian Corkhill	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
166	Brian Radley	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
167	Brian Tolen	None	SOUTH WHISTON & M62
168	Butchard	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
169	C Burton	None	SUE GENERAL, SOUTH WHISTON & M62
170	Carl	None	A58 PRESCOT
171	Carol Blakeborough	None	CONSULTATION, POLICY CS3 SUPPLY, HALEWOOD, POLICY CS15
172	Carol Hynes	None	SOUTH WHISTON & M62
173	Carol Waring	None	CONSULTATION, POLICY CS3 SUPPLY, SOUTH WHISTON & M62
174	Carole Burns	None	SUE GENERAL, SOUTH WHISTON & M62
175	Carole Utley	None	SOUTH WHISTON & M62
176	Catherine Jackson	None	SOUTH WHISTON & M62
177	Catherine Tolen	None	SOUTH WHISTON & M62
178	Charles Alfred Daly	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
179	Charles Murphy	None	SOUTH WHISTON & M62
180	Cheryl Cunningham	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
181	Chris Thompson	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
182	Christina Gore	None	SOUTH WHISTON & M62
183	Christine Jackson	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
184	Christopher Stafford	None	SOUTH WHISTON & M62
185	Claire Bland	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
186	Claire Madeloso	None	POLICY CS3 TARGET, HALEWOOD
187	Claire Revell	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
188	Clare Critchley	None	CONSULTATION, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
189	Colin Smith	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE

ID	Name	Organisation	Issues Raised
190	Colin Spratt	None	CONSULTATION, EDENHURST AVENUE
191	Collette Milne	None	CONSULTATION, KNOWSLEY VILLAGE
192	Cynthia James	None	CONSULTATION, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
193	D Fitzgerald	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
194	D J Ball	None	SUE GENERAL, SOUTH WHISTON & M62
195	D Johnson	None	KNOWSLEY LANE
196	Daniel Christopher Cassells	None	CONSULTATION, POLICY CS3 SUPPLY, SUE GENERAL
197	Daniel Smith	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
198	Daniel Wilson	Prescot Town Council	POLICY CS3 SUPPLY, POLICY CS3 TARGET, SUE GENERAL, A58 PRESCOT, CARR LANE
199	Darren Seddon	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 TARGET, POLICY CS4 SUPPLY, POLICY CS6, SUE GENERAL, SOUTH WHISTON & M62
200	Dave Sephton	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
201	David Ashworth	None	SUE GENERAL, SOUTH WHISTON & M62
202	David Blinkow	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
203	David Cox	None	CONSULTATION, HALEWOOD
204	David Dickinson	Highways Agency	POLICY CS4 SUPPLY, SUE GENERAL, KNOWSLEY LANE, HALEWOOD, SOUTH WHISTON & M62, POLICY CS27
205	David Holmes (1)	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
205	David Holmes (2)	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
205	David Holmes (3)	None	SOUTH WHISTON & M62
205	David Holmes (4)	None	SOUTH WHISTON & M62
205	David Holmes (5)	None	SOUTH WHISTON & M62, POLICY CS22
205	David Holmes (6)	None	SOUTH WHISTON & M62, POLICY CS24
205	David Holmes (7)	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
205	David Holmes (8)	None	SOUTH WHISTON & M62
206	David Kernick	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
207	David Muirhead	None	POLICY CS3 SUPPLY, KNOWSLEY LANE, SOUTH WHISTON & M62
208	David Vearncombe	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
209	Dawn Andrews	None	CONSULTATION, POLICY CS3 TARGET,

ID	Name	Organisation	Issues Raised
			POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
210	Debbie Lewis (1)	None	SUE GENERAL, SOUTH WHISTON & M62
210	Debbie Lewis (2)	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
211	Deborah Rush	None	SOUTH WHISTON & M62, POLICY CS24
212	Debra Murphy	None	CONSULTATION, POLICY CS3 SUPPLY, EDENHURST AVENUE
213	Denise Ellis	None	SOUTH WHISTON & M62
214	Dennis Crehan	None	POLICY CS4 TARGET, POLICY CS6, SOUTH WHISTON & M62
215	Dennis Jones	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
216	Derek and Laura Roughley	None	SOUTH WHISTON & M62
217	Derek Muirhead	None	CONSULTATION, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
218	Doreen Wallington	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
219	Doris Withe	None	SOUTH WHISTON & M62
220	Dorothy Daw	None	CONSULTATION, POLICY CS3 SUPPLY, SUE GENERAL, A58 PRESCOT,
221	Dorothy Wood	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
222	Douglas Thurgeston	Friends of Browns field & south avenue residents association	CONSULTATION, POLICY CS3 SUPPLY, SUE GENERAL, A58 PRESCOT, CARR LANE
223	Edith and Bryan Dagnall	None	SOUTH WHISTON & M62
224	Edward Judge	None	SUE GENERAL, SOUTH WHISTON & M62
225	Edward Lilley	None	POLICY CS3 SUPPLY, A58 PRESCOT
226	Eileen Morris	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
227	Elaine Hanley	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
228	Elaine Irlam	None	SOUTH WHISTON & M62
229	Elaine Roberts	None	POLICY CS3 SUPPLY, KNOWSLEY LANE
230	Elaine Rowe	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
231	Elaine Sheridan	None	SUE GENERAL, SOUTH WHISTON & M62
232	Elesta Muirhead	None	CONSULTATION, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62

ID	Name	Organisation	Issues Raised
233	Elizabeth Dorman	None	SOUTH WHISTON & M62
234	Elizabeth Kennedy	None	SOUTH WHISTON & M62
235	Ellen Holden	None	SUE GENERAL, SOUTH WHISTON & M62
236	Elsie Jean Percival	None	SOUTH WHISTON & M62
237	Emily Hrycan	English Heritage	POLICY CS20
238	Emma Lawless	None	SOUTH WHISTON & M62
239	Emma Owens	None	SOUTH WHISTON & M62
240	Emma Turton	None	CONSULTATION, KNOWSLEY LANE
241	Enid Clarke	None	SOUTH WHISTON & M62
242	Eric Binks	None	SUE GENERAL, SOUTH WHISTON & M62
243	Eric Stephenson	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, POLICY CS6, SUE GENERAL, SOUTH WHISTON & M62
244	Frances Douras	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
245	Frances Parry	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62,
246	Francis Moore	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
247	Gary Davis	None	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
248	Gary Kewley	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY LANE
249	Gaynor Finney	None	SOUTH WHISTON & M62
250	Gemma Carter	None	CONSULTATION, EDENHURST AVENUE
251	George Howarth MP	MP	CONSULTATION, POLICY CS3 TARGET, SUE GENERAL, KNOWSLEY LANE, A58 PRESCOT, KNOWSLEY VILLAGE
252	George Lee	None	CONSULTATION, EDENHURST AVENUE
253	George Rowe	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
254	Gerard Dolan	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
255	Gerard Gilligan	Liverpool Astronomical Society	SOUTH WHISTON & M62
256	Gillian Pinder	Rainhill Parish Council	SUE GENERAL, SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL
257	Gillian Smith	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
258	Gina O'Dowd	None	POLICY CS3 TARGET, SUE GENERAL,



ID	Name	Organisation	Issues Raised
			SOUTH WHISTON & M62
259	Gladys Webster	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, EDENHURST AVENUE
260	Graham Gofton	Roby Action Group	CONSULTATION, EDENHURST AVENUE
261	Graham Lund	None	HALEWOOD
262	H Andrews	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
263	Harry Dono	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
264	Harry Joseph Stott	None	SOUTH WHISTON & M62
265	Heather Byron	None	SOUTH WHISTON & M62
266	Heather Weightman	Knowsley Town Council	POLICY CS3 SUPPLY, KNOWSLEY VILLAGE, POLICY CS15, POLICY CS24
267	Helen O'Dowd	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
268	Hilda Gittens	None	POLICY CS3 SUPPLY, A58 PRESCOT
269	Hill	None	SUE GENERAL, SOUTH WHISTON & M62
270	Holford Holden	None	SUE GENERAL, SOUTH WHISTON & M62
271	I Thomas	None	EDENHURST AVENUE
272	Ian Banawich	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
273	Ian Calvert	None	HALEWOOD, OTHER SITE
274	Ian Holland	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
275	Ian Lawson	None	POLICY CS3 SUPPLY, EDENHURST AVENUE
276	Ian McCormack	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
277	Ian McKenzie	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
278	Ian Porter	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
279	Irene Davis (1)	None	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
279	Irene Davis (2)	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
279	Irene Davis (3)	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 TARGET, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS15, POLICY CS22, SUSTAINABILITY APPRAISAL
280	Irene Rimmer	None	CONSULTATION, POLICY CS4 TARGET, SOUTH WHISTON & M62
281	J A Barton	None	CONSULTATION, POLICY CS3 TARGET,

ID	Name	Organisation	Issues Raised
			POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
282	J A Ireland	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
283	J Cassels	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
284	J Hayes and Helen Lockley	None	SOUTH WHISTON & M62
285	J P Cairns	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
286	J Sanderson	None	SOUTH WHISTON & M62
287	J Waring	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
288	Jack and Barbara Creer	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, KNOWSLEY LANE
289	Jacqueline Jones	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
290	Jacqueline Lunt	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 TARGET, SUE GENERAL, SOUTH WHISTON & M62
291	James Eccleston	None	SOUTH WHISTON & M62
292	James O'Rourke	None	CONSULTATION, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS22, SUSTAINABILITY APPRAISAL
293	James R Ormond	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
294	Jan Haeck	None	SOUTH WHISTON & M62
295	Jane Aspinall	Bellway Homes Ltd (North West Division)	POLICY CS1, POLICY CS3 SUPPLY, POLICY CS5, SUE GENERAL, HALEWOOD, POLICY CS17
296	Janet Barnes	None	SOUTH WHISTON & M62
297	Janet Crehan	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
298	Janet Marriott	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
299	Janet Rourke	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 TARGET, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL
300	Janice Holmes	None	SOUTH WHISTON & M62
301	Jaqueline Robinson	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
302	Jayne Tattan (1), Petition (63)	None	CONSULTATION, POLICY CS3 SUPPLY, EDENHURST AVENUE
302	Jayne Tattan (2)	None	CONSULTATION, POLICY CS3 SUPPLY, EDENHURST AVENUE

ID	Name	Organisation	Issues Raised
303	Jean Ball	None	SOUTH WHISTON & M62, POLICY CS24
304	Jean Phillips	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
305	Jean Quinn (1)	None	SUE GENERAL, SOUTH WHISTON & M62
305	Jean Quinn (2)	None	SOUTH WHISTON & M62
306	Jean Rush	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS24
307	Jeanette Ormandy	None	SOUTH WHISTON & M62
308	Jeanette Sephton	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
309	Jeanette Sutton	None	SOUTH WHISTON & M62, POLICY CS24
310	Jeannette Hankin	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
311	Jen Kokosalakis (1)	None	CONSULTATION, POLICY CS3 SUPPLY, KNOWSLEY LANE, A58 PRESCOT, CARR LANE, SUSTAINABILITY APPRAISAL
311	Jen Kokosalakis (2)	None	CONSULTATION, POLICY CS3 SUPPLY, KNOWSLEY LANE, A58 PRESCOT, CARR LANE, SUSTAINABILITY APPRAISAL
312	Jennifer King	None	KNOWSLEY LANE
313	Jennifer Le Poidevin	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS24
314	Jennifer Mullin	None	POLICY CS3 SUPPLY, POLICY CS4 TARGET, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
315	Jennifer Park	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
316	Jenny Jones	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
317	Joan Fitzgerald	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
318	Joan Groves	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
319	Joan Hodgson	None	SOUTH WHISTON & M62
320	Joan Medder	None	POLICY CS4 SUPPLY, EAST OF KIP, KNOWSLEY VILLAGE
321	Joanne Harding	Halton Borough Council	NO COMMENT
322	Joanne Saunderson	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
323	Johanna Robinson	None	POLICY CS3 SUPPLY, POLICY CS3 TARGET, SUE GENERAL, A58 PRESCOT
324	John Alan Clarke	None	SOUTH WHISTON & M62
325	John Hindley	None	POLICY CS3 TARGET, SUE GENERAL,

ID	Name	Organisation	Issues Raised
			SOUTH WHISTON & M62
326	John Holmes (2)	None	CONSULTATION, POLICY CS3 TARGET, KNOWSLEY VILLAGE
326	John Holmes (1)	None	KNOWSLEY VILLAGE
327	John Jones	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
328	John McCormack	None	CONSULTATION, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
329	John Rush	None	SOUTH WHISTON & M62
330	John Sills (1) Petition (45)	None	CONSULTATION, POLICY CS3 SUPPLY, KNOWSLEY LANE, A58 PRESCOT, CARR LANE, SUSTAINABILITY APPRAISAL
330	John Sills (2)	None	CONSULTATION, POLICY CS3 SUPPLY, KNOWSLEY LANE, A58 PRESCOT, CARR LANE, SUSTAINABILITY APPRAISAL
331	John Sinclair	None	SOUTH WHISTON & M62
332	John Small	None	POLICY CS3 SUPPLY, SUE GENERAL
333	John Webster (1), Petition (38)	Roby Residents Action Group	EDENHURST AVENUE
333	John Webster (2), Petition (37)	None	EDENHURST AVENUE
333	John Webster (3), Petition (79)	None	EDENHURST AVENUE
333	John Webster (4), Petition (126)	None	EDENHURST AVENUE
333	John Webster (5), Petition (29)	None	EDENHURST AVENUE
333	John Webster (6), Petition (17)	None	EDENHURST AVENUE
333	John Webster (7), Petition (38)	None	EDENHURST AVENUE
333	John Webster (Junior)	Roby Residents Action Group	CONSULTATION, POLICY CS3 SUPPLY, EDENHURST AVENUE
334	John Webster (Senior)	None	CONSULTATION, SUE GENERAL, EDENHURST AVENUE
335	Jordan Spratt	None	EDENHURST AVENUE
336	Joseph Albert Aiello	None	EDENHURST AVENUE
337	Joseph Murphy	None	SOUTH WHISTON & M62
338	Joseph Todd	None	POLICY CS3 TARGET, SUE GENERAL
339	Joyce Tyrer	None	POLICY CS3 TARGET, SOUTH WHISTON & M62
340	Julian Austin	AMEC for National Grid	EAST OF KIP
341	Julie Anne Parker (1)	None	CONSULTATION, POLICY CS3 SUPPLY, POLICY CS4 TARGET, POLICY CS4 SUPPLY,

ID	Name	Organisation	Issues Raised
			SUE GENERAL, SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL
341	Julie Anne Parker (2)	None	SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL, HRA
342	Julie Ranson	None	POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
343	June Anders	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
344	K Brown (1)	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY LANE, A58 PRESCOT, CARR LANE
344	K Brown (2) Petition (47)	None	CONSULTATION, POLICY CS3 SUPPLY, KNOWSLEY LANE, A58 PRESCOT, CARR LANE, SUSTAINABILITY APPRAISAL
344	K Brown (3)	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY LANE, A58 PRESCOT, CARR LANE
345	K Sanderson	None	SOUTH WHISTON & M62
346	Karen Easton	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
347	Karen Hickey	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
348	Kate Greggans	None	HALEWOOD
349	Kathy Hack	None	SOUTH WHISTON & M62
350	Kathy Ireland	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
351	Katy Andrews	None	POLICY CS3 SUPPLY, POLICY CS4 TARGET, POLICY CS4 SUPPLY, POLICY CS6, SUE GENERAL, SOUTH WHISTON & M62
352	Kay Brown	None	CONSULTATION, POLICY CS4 SUPPLY, EAST OF KIP
353	Keith Daw	None	POLICY CS3 SUPPLY, POLICY CS14, SUE GENERAL
354	Keith Easton	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL
355	Keith Kennedy	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, HALEWOOD
356	Keith Paterson	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
357	Keith Sharp	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
358	Keith Swan	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
359	Keith Wooding	None	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, POLICY CS7, POLICY CS8, PWCKV AREA, SUE GENERAL, SOUTH

ID	Name	Organisation	Issues Raised
			WHISTON & M62, APPENDIX D
360	Kerry Woodall	None	SOUTH WHISTON & M6
361	Kerryanne Brown	None	SOUTH WHISTON & M62
362	Kevin Coakley	None	BANK LANE
363	Kirsty Easton	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL
364	Kirsty Meredith	None	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS22, POLICY CS24, SUSTAINABILITY APPRAISAL,
365	L J Rose	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
366	Larry Murphy	None	SOUTH WHISTON & M62
367	Laura Dono	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
368	Laura Furlong	None	SUE GENERAL, SOUTH WHISTON & M62
369	Lee McDonough	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
370	Lee Stephenson	None	SUE GENERAL, KNOWSLEY LANE
371	Lee Wilder	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
372	Leonard Tran	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
373	Leslie Fleetwood	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
374	Lianne French	None	CONSULTATION, POLICY CS3 SUPPLY, HALEWOOD
375	Linda Cullen	None	SOUTH WHISTON & M62
376	Linda O'Connor	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
377	Lisa Davies	None	SOUTH WHISTON & M62
378	Lisa Swinden	None	POLICY CS3 SUPPLY, SUE GENERAL
379	Louise Mitton	None	A58 PRESCOT
380	Lynda Stafford	None	SOUTH WHISTON & M62
381	Lynn Joanne Ryan	None	SOUTH WHISTON & M62
382	Lynn Warbrick	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
383	Lynne and Dave Berry	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
384	M Battle	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
385	M Coghlan	None	A58 PRESCOT
386	M E Wortley	None	POLICY CS3 TARGET, POLICY CS4 TARGET, SUE GENERAL, SOUTH WHISTON & M62,

ID	Name	Organisation	Issues Raised
			SUSTAINABILITY APPRAISAL
387	M Gouldson	None	SOUTH WHISTON & M62
388	M Hall	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
389	M Hewitt	None	SOUTH WHISTON & M62
390	M Penn	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
391	M Rider (1)	None	SOUTH WHISTON & M62
391	M Rider (2)	None	SOUTH WHISTON & M62
392	Malcolm Lawson (1)	None	POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
392	Malcolm Lawson (2)	None	POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
393	Malika Pachi	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
394	Manuel B Samosa	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
395	Marc Robinson	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
396	Margaret Dolan	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
397	Margaret Halvorsen	None	CONSULTATION, SOUTH WHISTON & M62
398	Margaret Holmes (2)	None	CONSULTATION, POLICY CS3 TARGET, KNOWSLEY VILLAGE
398	Margaret Holmes (1)	None	KNOWSLEY VILLAGE
399	Margaret Jerabek	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
400	Margaret Matthews	None	CONSULTATION, POLICY CS3 TARGET, KNOWSLEY VILLAGE
401	Margaret Russell	None	SOUTH WHISTON & M62
402	Maria Town	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, HALEWOOD
403	Marie Ormond	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
404	Marie Rimmer CBE	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
405	Marion Green (1)	None	CONSULTATION, KNOWSLEY LANE, A58 PRESCOT
405	Marion Green (2)	None	CONSULTATION, A58 PRESCOT
405	Marion Green (3)	None	CONSULTATION, A58 PRESCOT
405	Marion Green (4)	Forest Stud Ltd	CONSULTATION, A58 PRESCOT
406	Mark Gray	None	POLICY CS3 SUPPLY, EDENHURST AVENUE
407	Mark Inman	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62

<b>ID</b>	<b>Name</b>	<b>Organisation</b>	<b>Issues Raised</b>
408	Mark Jones	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
409	Mark Lewis	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
410	Mark Peter Murray	None	POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
411	Mark Sinclair	None	SOUTH WHISTON & M62
412	Martin Parker (1)	None	SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL
412	Martin Parker (2)	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL
412	Martin Parker (3)	None	SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL, HRA
413	Mary Lonsdale	None	CONSULTATION, HALEWOOD
414	Mary Steele	None	SOUTH WHISTON & M62
415	Matt Emblem	None	A58 PRESCOT
416	Maureen Inman	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
417	Maurice Handley	None	HALEWOOD, SOUTH WHISTON & M62
418	Maxine Jones	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
419	May Sands	None	SOUTH WHISTON & M62
420	Melissa Wood	None	SOUTH WHISTON & M62
421	Michael Gittens (1)	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, A58 PRESCOT
421	Michael Gittens (5)	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, A58 PRESCOT
421	Michael Gittens (3)	None	CARR LANE
421	Michael Gittens (2)	None	CONSULTATION
421	Michael Gittens (4)	None	POLICY CS3 TARGET, SUE GENERAL
422	Michael Humphreys	None	CONSULTATION, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL
423	Michael James	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
424	Michael Lawson	None	SOUTH WHISTON & M62
425	Michael Reid	None	POLICY CS3 SUPPLY, SUE GENERAL
426	Michelle Inman	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
427	Mike Collier	Wildlife Trust	POLICY CS8 SUE GENERAL
428	Mike Emblem	None	A58 PRESCOT
429	Moran	None	SOUTH WHISTON & M62



ID	Name	Organisation	Issues Raised
430	Morris	None	SOUTH WHISTON & M62
431	Mr and Mrs McMullen (1)	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, KNOWSLEY LANE
431	Mr and Mrs McMullen (2)	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, KNOWSLEY LANE
432	Mr and Mrs Phillips	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
433	Myra Hankey	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
434	N Corbett	None	SOUTH WHISTON & M62
435	N G Pennington	None	SOUTH WHISTON & M62
436	Natasha Muirhead	None	DUTY TO COOPERATE, POLICY CS3 SUPPLY, SOUTH WHISTON & M62
437	Nattalie Kennedy (2)	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, HALEWOOD
437	Nattalie Kennedy (1)	None	POLICY CS3 SUPPLY, SUE GENERAL, HALEWOOD
438	Neil Ball	None	SOUTH WHISTON & M62
439	Neil Miney	None	POLICY CS3 TARGET, SOUTH WHISTON & M62
440	Nichola Saunders	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
441	Nicholas Davison	None	SUE GENERAL
442	Nicola Davis	None	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
443	Nicola Hitchen	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL
444	Nicola Meredith	None	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS22, POLICY CS24, SUSTAINABILITY APPRAISAL
445	Nora Haynes	None	SOUTH WHISTON & M62
446	Norman Feely	None	SUE GENERAL, SOUTH WHISTON & M62
447	Oliver Kennedy	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, HALEWOOD
448	P E Prescott	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, A58 PRESCOT
449	Pamela C Lee	None	SOUTH WHISTON & M62
450	Pamela Shepherd	None	SOUTH WHISTON & M62
451	Parkinson	None	SOUTH WHISTON & M62
452	Patricia	None	SOUTH WHISTON & M62

ID	Name	Organisation	Issues Raised
	Ainsworth		
453	Patricia Dobson, Michael Balliff	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, KNOWSLEY LANE
454	Patricia McDonald- Holmes (6)	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M63
454	Patricia McDonald- Holmes (1)	None	SOUTH WHISTON & M62
454	Patricia McDonald- Holmes (7)	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M63
454	Patricia McDonald- Holmes (2)	None	SOUTH WHISTON & M62
454	Patricia McDonald- Holmes (3)	None	SOUTH WHISTON & M62
454	Patricia McDonald- Holmes (4)	None	POLICY CS3 TARGET, POLICY CS22, SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL
454	Patricia McDonald- Holmes (5)	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS24, SUSTAINABILITY APPRAISAL
454	Patricia McDonald- Holmes (8)	None	SOUTH WHISTON & M62
455	Patricia O'Neill	None	SOUTH WHISTON & M62
456	Patrick O'Rourke A	None	SUE GENERAL
457	Patrick O'Rourke B	None	KNOWSLEY VILLAGE
458	Paul Crouch	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
459	Paul Haynes	None	SOUTH WHISTON & M62
460	Paul Lawson	None	CONSULTATION, SOUTH WHISTON & M62
461	Paul Marshall	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
462	Paul Rodenhurst	None	SOUTH WHISTON & M62
463	Paul Sinclair	None	SOUTH WHISTON & M62
464	Paul Williams	None	SOUTH WHISTON & M62, POLICY CS15
465	Paul Woods	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, KNOWSLEY LANE
466	Paula Day	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62

ID	Name	Organisation	Issues Raised
467	Paula Ferry	None	SOUTH WHISTON & M62
468	Paula Meredith	None	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS22, POLICY CS24, SUSTAINABILITY APPRAISAL
469	Paula Robinson	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
470	Paula Rose	None	SOUTH WHISTON & M62
471	Pauline Binks	None	SOUTH WHISTON & M62
472	Pauline Columbine	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
473	Pauline Jones	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
474	Pete Lamble	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
475	Peter Bate	None	HALEWOOD, POLICY CS24
476	Peter Bracken (1)	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
476	Peter Bracken (2)	None	SOUTH WHISTON & M62
477	Peter Campbell (1)	None	POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
477	Peter Campbell (2)	None	POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
478	Peter Karl Phillips	None	SOUTH WHISTON & M62
479	Peter Philips	None	SOUTH WHISTON & M62
480	Peter Sutton	None	SOUTH WHISTON & M62
481	Philip Jennings	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
482	Philip Jones	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
483	Philip Williamson	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, HALEWOOD
484	Phillip Jones	None	BANK LANE
485	Prescot Angling Association	Prescot Angling Association	SOUTH WHISTON & M62
486	R Martin	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
487	R McCauley	St. Helens MBC	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
488	Rachel Freeman	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 TARGET, POLICY CS4 SUPPLY, KNOWSLEY LANE,
489	Rachel Johnson	None	CONSULTATION, POLICY CS3 SUPPLY, HALEWOOD
490	Ray and Lesley	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY,

ID	Name	Organisation	Issues Raised
	Harrison		KNOWSLEY VILLAGE
491	Ray Gough	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
492	Raymond Beard	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
493	Raymond O'Neill	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
494	Richard George Robinson	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
495	Richard Hennity	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, HALEWOOD
496	Robert Cullen	None	SOUTH WHISTON & M62
497	Robert Jackson	None	KNOWSLEY VILLAGE, OTHER SITE
498	Roberts	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
499	Robin Lomax	None	SOUTH WHISTON & M62, HRA
500	Ron Tracey	None	SOUTH WHISTON & M62
501	Ronald Prescott	None	CONSULTATION, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL
502	Ross Anthony	Theatres Trust	POLICY CS27
503	Roy Easton	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
504	Roy Hardman	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62,
505	Roy Turell	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL
506	Ruth Moss	None	SOUTH WHISTON & M62
507	S B Allport	None	CONSULTATION, POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
508	S Drakefield	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, EAST OF KIP, KNOWSLEY VILLAGE
509	S Dwyer	None	KNOWSLEY VILLAGE
510	S Hewitt	None	SOUTH WHISTON & M62
511	S Stone	None	POLICY CS3 TARGET, HALEWOOD
512	Sandra Cassidy	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
513	Sandra Harrison	None	CONSULTATION, SOUTH WHISTON & M62
514	Sandra Rigby	None	SOUTH WHISTON & M62
515	Sarah Carr	None	POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
516	Sarah Hindley	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
517	Sarah-Jane Jarman	None	CONSULTATIONPOLICY CS3 SUPPLY, POLICY CS4 TARGET, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS15

<b>ID</b>	<b>Name</b>	<b>Organisation</b>	<b>Issues Raised</b>
518	Scott Cunningham	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
519	Seth Ormandy	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
520	Sharon Murphy	None	POLICY CS3 TARGET, HALEWOOD
521	Shaun Woodward MP (1)	MP	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
521	Shaun Woodward MP (2)	MP	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
522	Sidney Muchmore	None	CONSULTATION, POLICY CS3 SUPPLY, SOUTH WHISTON & M62
523	Simon Brown	None	CONSULTATION, HALEWOOD
524	Sophie Weatherall	None	KNOWSLEY LANE
525	Stephen Causer	None	SOUTH WHISTON & M62
526	Stephen Davies	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
527	Stephen Dingsdale	None	SOUTH WHISTON & M62
528	Stephen Ryan	None	SOUTH WHISTON & M62
529	Stephen Walsh	None	POLICY CS3 TARGET, SOUTH WHISTON & M62
530	Steven Clew	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
531	Steven Gaskell	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
532	Steven Granite	None	CONSULTATION, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
533	Stuart Baldwin	None	SOUTH WHISTON & M62
534	Stuart Sheridan	None	SOUTH WHISTON & M62
535	Susan Addy	None	CONSULTATION, POLICY CS3 SUPPLY, SOUTH WHISTON & M62
536	Susan Bently	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SOUTH WHISTON & M62
537	Susan Campbell	None	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
538	Susan Lomax	None	SOUTH WHISTON & M62
539	Susan Miney	None	SOUTH WHISTON & M62
540	Susan Rodenhurst	None	SOUTH WHISTON & M62
541	Susan Smith	None	POLICY CS4 SUPPLY, EAST OF KIP
542	Suzanne Lewis	None	POLICY CS3 TARGET, POLICY CS3 SUPPLY, POLICY CS4 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL
543	Suzie Campbell	None	KNOWSLEY VILLAGE

ID	Name	Organisation	Issues Raised
	(1)		
543	Suzie Campbell (2)	None	KNOWSLEY VILLAGE
544	Sylvia Jones	None	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62,
545	T E O'Conner	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
546	Thelma Stott	None	SOUTH WHISTON & M62
547	Thomas Gouldson	None	SOUTH WHISTON & M62, POLICY CS15
548	Thomas Jones	None	CONSULTATION, DUTY TO COOPERATE, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62
549	Thomas Roberts	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, EDENHURST AVENUE
550	Tina Cinnamond	Friends of Halsnead Allotment Group	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL
551	Tina Cinnamond	None	CONSULTATION, POLICY CS3 TARGET, SOUTH WHISTON & M62, SUSTAINABILITY APPRAISAL
552	Tony Wiltshire	None	SOUTH WHISTON & M62
553	Tracy Vickers	None	POLICY CS3 TARGET, SUE GENERAL, SOUTH WHISTON & M62
554	Trevor Jarman	None	CONSULTATIONPOLICY CS3 SUPPLY, POLICY CS4 TARGET, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS15
555	Trinity Banawich	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
556	Unknown	None	POLICY CS3 SUPPLY, EDENHURST AVENUE
557	Valerie Forster	None	EDENHURST AVENUE
558	Valerie O'Neill	None	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
559	Vanessa Wood	None	SOUTH WHISTON & M62
560	Victor Russell	None	SOUTH WHISTON & M62
561	Vincent Kilshaw	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
562	Violet Burns	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62
563	Whiston Petition (3221)	None	SOUTH WHISTON & M62
564	William Hall	None	SOUTH WHISTON & M62
565	William Halvorsen	None	CONSULTATION, SOUTH WHISTON & M62
566	William Hennessey	None	POLICY CS3 SUPPLY, SOUTH WHISTON & M62

<b>ID</b>	<b>Name</b>	<b>Organisation</b>	<b>Issues Raised</b>
567	William Rumsby	None	SOUTH WHISTON & M62
568	Yvonne Owens	None	POLICY CS3 SUPPLY, POLICY CS4 SUPPLY, SUE GENERAL, SOUTH WHISTON & M62, POLICY CS15
569	Various, c/o Middleton Solicitors (x625 copies)	Save Knowsley Village Green Belt Group	POLICY CS3 SUPPLY, KNOWSLEY VILLAGE
570	Various, c/o Middleton Solicitors (x900 copies)	Save Knowsley Village Green Belt Group	CONSULTATION, POLICY CS3 TARGET, POLICY CS3 SUPPLY, KNOWSLEY VILLAGE

## 01 NO COMMENTS

Representations within which no specific comments were made.

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
NO COMMENTS 001	1	001	Angela Gemmill, Marine Management Organisation
NO COMMENTS 002	1	321	Joanne Harding, Halton Borough Council
<b>Total</b>	<b>2</b>		





By email: [localplan@knowsley.gov.uk](mailto:localplan@knowsley.gov.uk)

Our reference: 769

19 September 2014

Dear Sir/Madam,

**Re: Knowsley Local Plan - Consultations on modifications to Local Plan Core Strategy, draft Supplementary Planning Documents and Knowsley Industrial and Business Parks Local Development Order**

Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultations. I can confirm that the MMO has no comments to submit in relation to this consultation.

If you have any questions or need any further information please just let me know. More information on the role of the MMO can be found on our website [www.gov.uk/mmo](http://www.gov.uk/mmo)

Yours sincerely



Angela Gemmill  
Relationship Manager

E 

[REDACTED]

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**From:** Joanne Harding [REDACTED]  
**Sent:** 12 November 2014 16:10  
**To:** [REDACTED]  
**Subject:** Core Strategy Mods - Halton BC Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Local Plan Team,

Thank you for consulting Halton Borough Council on your latest consultation.

Halton Borough Council do not wish to make any representations seeking to change to any of the proposed modifications to the Knowsley Local Plan: Core Strategy.

In the spirit of ongoing cooperation between our authorities, we would be most grateful if you would continue to engage with Halton Borough Council in the preparation of the Knowsley Local Plan.

Kind regards

**Joanne Harding MRTPI**  
Principal Planning Policy Officer  
Halton Borough Council

**Email:** [REDACTED]  
**Tel:** [REDACTED]

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## 02 CONSULTATION

### Representations relating to Consultation on the Local Plan Core Strategy

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
CONSULTATION 001	1	125	A S Davies
CONSULTATION 002	1	126	Ada Whitby
CONSULTATION 003	1	127	Adrian Carter
CONSULTATION 004	2	128	Alan McNab (1)
		128	Alan McNab (2)
CONSULTATION 005	1	130	Alan Vearncombe (1)
CONSULTATION 006	1	134	Andrea O'Rourke
CONSULTATION 007	1	138	Andrew Williams (1)
CONSULTATION 008	1	138	Andrew Williams (2)
CONSULTATION 009	1	143	Ann Robertson
CONSULTATION 010	1	148	Anne Thornton
CONSULTATION 011	1	150	B Kirkwood (1)
CONSULTATION 012	3	150	B Kirkwood (2)
		326	John Holmes (2)
		398	Margaret Holmes (2)
CONSULTATION 013	1	153	Barbara Anderson
CONSULTATION 014	1	157	Barry Lucas
CONSULTATION 015	1	158	Barry Worrall Petition (1003)
CONSULTATION 016	1	79	Berry
CONSULTATION 017	2	160	Bess Smith
		537	Susan Campbell
CONSULTATION 018	1	168	Butchard
CONSULTATION 019	1	171	Carol Blakeborough
CONSULTATION 020	1	173	Carol Waring
CONSULTATION 021	1	188	Clare Critchley
CONSULTATION 022	1	86	Cllr Ian Smith (1)
CONSULTATION 023	1	86	Cllr Ian Smith (2)
CONSULTATION 024	1	189	Colin Smith
CONSULTATION 025	1	190	Colin Spratt
CONSULTATION 026	1	191	Collette Milne
CONSULTATION 027	1	192	Cynthia James
CONSULTATION 028	1	196	Daniel Christopher Cassells
CONSULTATION 029	1	197	Daniel Smith
CONSULTATION 030	1	202	David Blinkow
CONSULTATION 031	1	203	David Cox
CONSULTATION 032	2	205	David Holmes (2)
		454	Patricia McDonald-Holmes (6)
CONSULTATION 033	1	208	David Vearncombe
CONSULTATION 034	1	209	Dawn Andrews
CONSULTATION 035	1	112	Debbie King (1)
CONSULTATION 036	1	210	Debbie Lewis (2)

Reference	Copies Submitted	Submitted By:	
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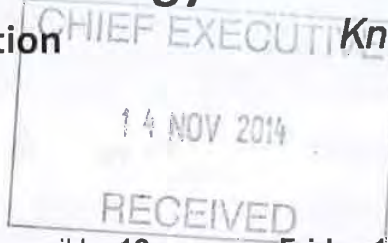
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(continued)			Xander Blair-Porter
			Xavier Blair Porter
			Yvonne Dixon
			Yvonne Smith
			Unknown (address only) x 12
			Unknown (no address) x 6
CONSULTATION 090	1	365	L J Rose
CONSULTATION 091	1	367	Laura Dono
CONSULTATION 092	1	371	Lee Wilder
CONSULTATION 093	1	374	Lianne French
CONSULTATION 094	1	383	Lynne and Dave Berry
CONSULTATION 095	1	388	M Hall
CONSULTATION 096	1	390	M Penn
CONSULTATION 097	1	395	Marc Robinson
CONSULTATION 098	1	396	Margaret Dolan
CONSULTATION 099	1	397	Margaret Halvorsen
CONSULTATION 100	1	400	Margaret Matthews
CONSULTATION 101	1	405	Marion Green (1)
CONSULTATION 102	1	405	Marion Green (2)
CONSULTATION 103	1	405	Marion Green (3)
CONSULTATION 104	1	405	Marion Green (4)
CONSULTATION 105	1	409	Mark Lewis
CONSULTATION 106	1	413	Mary Lonsdale
CONSULTATION 107	1	421	Michael Gittens (2)
CONSULTATION 108	1	422	Michael Humphreys
CONSULTATION 109	1	432	Mr and Mrs Phillips
CONSULTATION 110	1	440	Nichola Saunders
CONSULTATION 111	1	23	Patricia Todhunter
CONSULTATION 112	1	460	Paul Lawson
CONSULTATION 113	1	461	Paul Marshall
CONSULTATION 114	1	465	Paul Woods
CONSULTATION 115	1	469	Paula Robinson
CONSULTATION 116	1	472	Pauline Columbine
CONSULTATION 117	1	483	Philip Williamson
CONSULTATION 118	1	488	Rachel Freeman
CONSULTATION 119	1	489	Rachel Johnson
CONSULTATION 120	2	96	Ray Davis (1)
		96	Ray Davis (4)
CONSULTATION 121	1	96	Ray Davis (2)
CONSULTATION 122	1	96	Ray Davis (5)
CONSULTATION 123	1	492	Raymond Beard
CONSULTATION 124	1	493	Raymond O'Neill
CONSULTATION 125	1	494	Richard George Robinson
CONSULTATION 126	1	498	Roberts

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
CONSULTATION 127	1	23	Robin Todhunter
CONSULTATION 128	1	99	Romilly Scragg
CONSULTATION 129	1	501	Ronald Prescott
CONSULTATION 130	1	504	Roy Hardman
CONSULTATION 131	1	507	S B Allport
CONSULTATION 132	1	508	S Drakefield
CONSULTATION 133	1	513	Sandra Harrison
CONSULTATION 134	2	517	Sarah-Jane Jarman
		554	Trevor Jarman
CONSULTATION 135	1	522	Sidney Muchmore
CONSULTATION 136	1	523	Simon Brown
CONSULTATION 137	1	532	Steven Granite
CONSULTATION 138	1	535	Susan Addy
CONSULTATION 139	1	549	Thomas Roberts
CONSULTATION 140	1	550	Tina Cinnamond
CONSULTATION 141	1	551	Tina Cinnamond
CONSULTATION 142	1	558	Valerie O'Neill
CONSULTATION 143	1	22	Wendy Moran
CONSULTATION 144	1	565	William Halvorsen
<b>Total</b>	<b>1064</b>		



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

### RETURNING THIS FORM

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

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

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

#### PART A – PERSONAL DETAILS

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

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

A specific Analysis and critique is enclosed as a Letter, which is attached.

Continue on a separate sheet if necessary...

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

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature

[Redacted Signature]

Date

11.11.14

Mrs. A. S. Davies.

Local Planning Team,  
Knowsley Council,  
1<sup>st</sup> Floor Annex,  
Municipal Buildings,  
Archway Rd, Huyton,  
L36 9XU.



11.11.14.

Dear Sirs,

Re: KNOWSLEY LOCAL PLAN - PUBLIC  
CONSULTATION.

HAND BOUNDED BY A58 (Whitakers Triangle),  
KNOWSLEY LANE and CARR LANE.

We share the concern of many with an  
apparent hidden agenda by the Council  
and the cavalier disregard for adequate  
and robust Consultation:-

- Perfunctory effort not a blanket  
coverage. On hearing local rumours contact  
was made with a planning Officer, when we  
were informed that our home fell outside  
an arbitrary measure of 200 metres for  
Consultation from the nearest proposed site  
at the end of Carr Lane; our home is

is closer than 200 metres. We had to make strong request for the relevant documentation to be sent to us electronically.

The proposals have such serious ramifications for Prescott in particular and the Borough of Knowsley overall that there should have been widespread Consultation preceded by a proper and comprehensive communication as a precursor to properly organised public meetings. A Referendum should have been the outcome of a transparent Process and ensured the legality of a decision that Knowsley Council - and the Community - could have abided by.....

- The ~~lynets~~ Green Belt areas (A58, Knowsley Lane, Carr Lane) are all part of the M57 Green Belt corridor designated as a strategic green link, these areas as set should be permanent.

- Recently the Secretary of State, Eric Pickles stated that Green Belt should be protected and not sacrificed as an easy option, "incursions into the Green Belt

just only occur in exceptional circumstances and must be planned in a logical and strategic way."

The current proposals are surely not to be regarded as being exceptional circumstances, particularly in the context of the latest guidance.

- Green Belt.

To check unrestricted urban sprawl of large built up areas

To prevent neighbouring towns from merging into one another.

To assist in safeguarding the countryside from encroachment

To preserve the setting and special character of historic towns - like Prescot.

To assist in urban regeneration by encouraging the re-cycling of derelict and other urban land.

Land bordered by the A58, Knowsley Lane and Carr Lane are three sites, which check unrestricted sprawl, prevent merging of neighbouring towns and assist in safeguarding the countryside. These swathes of green



provide a pleasant backdrop and enhance the lives of people living in the local vicinity and those passing through and are a significant element in the character of Prescot.

- Three housing developments in such close proximity to each other will create traffic problems with increased volume. At present traffic flows well through Prescot, down the A58, and the Prescot end of Huyton Lane, the reasons being few traffic lights, more roundabouts. Once Longview Drive, Huyton is reached the traffic snarls and comes to a standstill due to the profusion of traffic lights and a greater density of housing.

- Air quality will be affected by increased volume of traffic and increase in CO<sub>2</sub> from loss of greenery. Health and well being determinate too.

- Planning Minister Brandon Lewis is quoted as stating that, "We have put Local Plans at the heart of the reformed

planning system so Councils and local people now decide where development should and shouldn't go. Knowsley Council should heed this.

- The three sites will require extra Medical Centres, provision for additional school places and no apparent land reserved for any additional Primary Schools or infrastructure Projects in the proposal for Knowsley Village.

- Knowsley Council claims in a display cabinet in the Huyton One Stop Shop to be Britain's GREENEST BOROUGH and in addition has 16 Green Flag Parks.

There is also the Knowsley Green Space strategy which discusses the benefits of green space Chap 5. and paras. 6.3a and 7.2. Why then are they about to grab large areas of Green Belt.

- The indiscriminate disregard for the quality of the environment by the demolition of quality homes in Archway Road, Poplar Bank, Huyton Hey Road and housing develop-

ments on farm land ~~and~~ close to the centre of Huyton Village, which all took place in the 20<sup>th</sup> century, is history to repeat itself? There are significant sites awaiting realistic redevelopment. For example the former Huyton Cricket Club on Huyton Lane, the former Leisure Centre site in Roby Road, the vacant site of the transferred Roby Tertiary College on Rupert Road and the long vacant site in Western Avenue, where Bowring Park High School once stood.

Then there are Brown Field sites on the land adjoining Ellis Ashton Street in Huyton Quarry.

There are model exemplars of successful developments on Brown Field sites, where Developers were undaunted by the cost of ground remediation and landscape improvement. The Cabbs Retail Park and adjoining mixed housing development is a recent improvement.

and success. We are also encouraged by the imminent construction of 600 properties (and the provision of more industrial units to enhance employment opportunities) and the cleared and formerly B.I.C.C. sites parallel to the railway line with access from Cross Lane.

The Council is misguided in the belief that new and additional housing will halt the spiral of the ever declining population of Knawsley. It will certainly not increase the population with a poor image and low achieving secondary schools.

Yours faithfully,



A. S. DAVIES .



Knowsley Council

# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

## RETURNING THIS FORM

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

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

### **PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	ADA	Middleton Solicitors
Job Title (if appropriate)	WIDOW/RETIRED	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

- a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.
- b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KBGS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

OBJECTIONS AS PER LETTER.  
OBJECTING MOST STRONGLY.  
I HAVE LIVED IN THIS VILLAGE SINCE  
1945 AND HAVE WITNESSED INCREASE  
OF TRAFFIC ON KNOWSLEY LANE WHICH  
IS A SERIOUS PROBLEM NOW.  
WHY DESTROY A VILLAGE WHEN THERE  
ARE OTHER AREAS BEST SUITED.

*Continue on a separate sheet if necessary...*

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

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

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



TOO OLD.  
(91 YRS.)

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



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

Signature



Date: 12th November 2014





Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Adrian Carter	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	Letter	

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

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

I do not believe that the proposed removal of greenbelt is sound, nor do I believe that the proposal put forth to create 87 dwellings and green space is sound.

The area proposed by to be removed by the council and the developers has previously been used as sports fields and entertainment by the local community. This land was then bought by speculative developers and has been prevented from being used by the local community.

The proposal to remove this as greenbelt land would see an increase in the local traffic and impact the quality of life by the residents. Furthermore I do not believe that there is adequate resources open in the area.

St Pascal Baylon school is currently an oversubscribed school. With the introduction of 87 dwellings – many with children, this would impact the school heavily. Children who could go to this as their local school may well end up being pushed out further afield. Furthermore this is not a Knowsley Council school – but a Liverpool one. All local schools are oversubscribed and there is simply not enough places to go around.

The school creates significant traffic along Edenhurst Avenue and Gladstone Avenue during school times, to the degree that this is often dangerous as parents park without due care and attention. The creation of additional houses will increase this problem. I have concerns that there may be increased risk of accidents.

The additional houses will also create extra pressure in the surrounding area on resources it is hard to be seen to be a sustainable development.

- *The Plan should be founded on a robust and credible evidence base involving: evidence of participation of the local community and others having an interest in the area; and research/fact finding: the choices made in the Plan are backed up by facts*
- *The Plan should provide the most appropriate strategy when considered against reasonable alternatives.*
- *The Plan should show how its policies and proposals help to ensure that the social, environmental, economic and resource objectives of sustainability will be achieved*

The local doctors, whilst currently accepting some new patients will be stretched on its current resources. It is currently impossible to get an appointment within the current guidelines due to this being an oversubscribed practice.

Furthermore the increased traffic will create significant problems to the local community. During the proposed building this will lead to heavy industrial traffic on residential roads, and will lead to significant disruption to the residents during this build period. Our right to family life will therefore be impacted greatly. This may also lead to accidents to local people, possibly children.

The proposal to have open green space on the edge of the site, is neither required nor needed. There are significant open green spaces, both at Court Hey Park and on Childwall Valley Road. This creation of open green space which will lead on to the Belle Vale estate will cause significant anti-social behaviour and will be used as a cut through for people not residing in the current area. This will not only lead to anti-social behaviour but will cause significant impact on police resources and create an unsafe environment for those of us who reside in the area.

The proposal has not taken into account local resident concerns and therefore cannot be considered as justified or sound as we have been excluded from the proposed developments until today.

The proposal to build 87 dwellings would impact on the local housing stock. These will stick out like a sore thumb. If this proposal is approved these should be built in a similar style to existing properties so to reflect the local area. Furthermore residents should be compensated as our house prices will be affected and potentially see a decrease in value especially during any building period.

The trees are a haven for wildlife and I have seen bats flying from the trees there at dusk. There is a flood zone which needs to be maintained. There is precious little green space left and once again it seems to be for the needs of developers rather than the interests of the local community. I have not yet met one resident who is supportive of this proposal.

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

I object to the proposal as this is not justified. Should this be approved, I believe that the removal of green space will damage the local houses and the feel of the estate.

The additional opening of un-required green space will create increased anti-social behaviour and will result to increased crime. I would propose that should the houses be built that the area identified as a flood zone is not opened up so to prevent increased crime and antisocial behaviour.

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

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

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



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

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

Signature

[REDACTED]

Date 13/11/2014

  
**From:** Alan McNab   
**Sent:** 14 November 2014 11:32  
**To:** Knowsley Local Plan  
**Subject:** Objections to proposed development of land - Whiston South  
**Attachments:** Knowsley-Local-Plan-Representations.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs,

Please find attached local plan representation forms containing my objection to the disgusting profiteering sale of green belt land in Whiston South, and the ridiculous proposal to build over 1500 houses which the community and infrastructure cannot sustain.

Yours faithfully,

Alan McNab



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



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

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

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Alan McNab	
Job Title (if appropriate)	Company Director	
Organisation (if appropriate)	Ezee Legal Services	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

M055 to *All*

Policy Ref

CS1, to CS5,  
*SUE ETC*

Paragraph Ref

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

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

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

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion, especially as most of my neighbours have only just heard of the proposals to build on Green Belt at South Whiston. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states "Planners must protect our Green Belt" see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case.

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

I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton. Is Not consistent with National Policy

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

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

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

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

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Signature

[Redacted Signature]

Date

13th November 2014

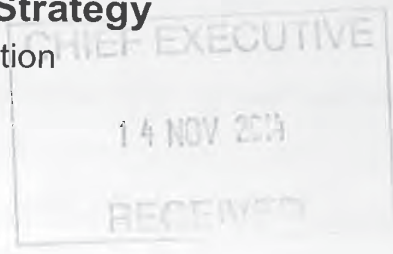




Knowsley Council

# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



**RETURNING THIS FORM**

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

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

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

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MR	Solicitor
Name	ALAN VEARNCOMBE	Middleton Solicitors
Job Title (if appropriate)	CHARTERED CIVIL ENGINEER	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

MANY AREAS OF "BROWN LAND" NOT BEING CONSIDERED.

Knowsley Village will not be a village any more if the proposals are met. People living here might as well move to Liverpool City Centre. This would become a small town.

Wild life in the village, of which there is a great deal, would totally disappear.

Continue on a separate sheet if necessary...

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

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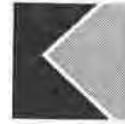
a) No, I do not want to participate at any further public hearing

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

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

Signature.....  .....

Date... 12<sup>th</sup> ..... November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	ANDRGA O'ROURKE	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

- Building on this land will cause severe harm to the Green Belt
- Building on this site will have an adverse effect upon farmland wildlife, especially declining species such as Skylark, Partridge, Yellowhammer and Hare
- There will be a reduction in agricultural land.
- There will be a reduction in the separation distance between Whiston and Rainhill, and between Whiston and Liverpool, between Whiston and St Helens, and between Whiston and Widnes.
- The development proposed will increase the likelihood of Whiston merging with other nearby urban areas.
- The development proposed will result in urban sprawl.
- The development proposed will result in encroachment into the countryside
- The development at the site will cause light pollution, affecting nocturnal wildlife and adversely affecting the observatory at nearby PEX Hill. Continue on a separate sheet if necessary...
- The increase in traffic will have a detrimental effect on the local road networks.

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

- Use and utilise brownfield land in the first instance.
- Use empty properties.
- Better consultations.

*Continue on a separate sheet if necessary...*

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Signature



Date

1/11/14



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### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Andrew Williams	
Job Title (if appropriate)	HART Operative	
Organisation (if appropriate)	North West Ambulance Service	
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	[REDACTED]	

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Name and/or Organisation

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SEE ATTACHED

*Continue on a separate sheet if necessary...*

- **CONSULTATION PROCESS.** The local community was not kept informed by Knowsley Council as to the details of the plan or any of its modifications until quite late in the process. As a local resident myself (I live in Greengates, Knowsley Lane) I received a document in approximately 2008 briefly describing the plan but stating that the process was in its infancy and full public consultation would follow. However, the next information I, along with a few other local residents received was the public meeting dates for MODIFICATIONS to the plan, the plan itself having already been agreed. This was in late September of 2014. Speaking to many locals they, and myself, had received NO notification regarding the initial round of consultations. At the public meeting held in Huyton on 9/10/14 I asked Mrs Lisa Harris of the planning department if she could send me details of who had been contacted in the initial rounds and how that contact had been made, via email. She agreed but the information I received from her did not contain that specific information.
- **TRAFFIC LEVELS.** The area of Knowsley Lane is extremely busy and dangerous with traffic during daylight hours. If the proposals go ahead to build houses/retail areas etc, traffic levels will become even higher causing more congestion, noise and pollution which could only impact negatively on the local community with regards to health, safety and overall wellbeing. Furthermore, there are already traffic restrictions in place that could not feasibly be lowered for a road as heavily used as it is, again increasing the danger for local residents and their families. This, of course does not take into account the disruption to the local community while all of the new properties are being constructed (road closures, noise, construction traffic etc)
- **LOSS OF LEISURE FACILITIES/GREENSPACE.** The area along Knowsley Lane marked for development is heavily used for leisure purposes by the local community. Teams from all over the North West use the football grounds regularly (Sunday League etc). The area is popular with dog walkers and families and the local farm (Patton's) is a thriving equestrian centre and livery for local riders and has been for generations. As above, this can only have a negative impact on the health of the local community and its general wellbeing, especially as there are many government and local government initiatives trying to encourage people to exercise more at this time.
- **WILDLIFE/ENVIRONMENT.** There will be a significant impact on wildlife and the environment if the development goes ahead. Already, over recent years we have seen a reduction in most common bird species due to destruction of habitat. Development in these greenfield sites will inevitably see a further decline in these numbers as well as the total destruction of sites used by migratory birds such as Canada Geese, Oyster Catchers and

Pink Footed Geese, which regularly migrate through the area. There are also breeding pairs of various raptors such as Buzzards and Kestrels. The area also sees rare insect types on occasion such as Brimstone Butterflies and Hummingbird Hawk Moths, which I and my family have seen personally. The belt of land surrounding Knowsley Village and running up to Prescot also has colonies of roosting bats of various species. Bats, their roosts, habitats and flight corridors are heavily protected under UK AND European law. Examples of such legislation can be found in The Bern Convention appendix 2, Bonn Convention appendix 2, Habitats Directive Annex 4 and 2, Conservation of Habs and Species Regs 2010, Wild Mammals Protection Act, UK BAP Priority Species Act, The Euro Bats Agreement Pact and The Wildlife Conservation Act. Any damage or interference to bat habitat, bats themselves or their hunting/ flight corridors carries substantial fines and legal action and their protections can only be removed in extremely rare circumstances. Loss of trees and natural water courses if combined with the addition of hard surfaces e.g. tarmac, flagging will see a rise in flooding in the area, increasing pressure on already inadequate drainage systems.

- POOR INFRASTRUCTURE. An increase in population will overstretch local resources leading to problems with school placements for families, GP cover etc.
- LOCAL TRADE. Any additional retail facilities may have an economic boost for the area but will also have a detrimental effect on small local businesses which, in these austere times, are struggling already.
- CHARACTER. Although urban, the residents along Knowsley Lane are lucky in that they have so much green space in view at all times, giving the area a suburban feel. Any loss of these spaces would fundamentally affect the character of the area, drastically affecting a community that makes regular use of these spaces.

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

There has been NO proper consultation process followed with local residents, too little information given and too late, meaning that the local residents have had very little chance to respond to the proposed plan, either to object or share their views/concerns with the Council and therefore the Government inspectors.

The details of the plan and its modifications are too dense for the layman, meaning documents such as this cannot be completed properly, making objections/concerns invalid as far as the legal process is concerned.

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**Signature** A.J.Williams



**Date** 13/11/14

[REDACTED]

---

**From:** HOWARTH, George [REDACTED]  
**Sent:** 14 November 2014 11:55  
**To:** [REDACTED]  
**Subject:** FW: Objections to Knowsley Local plan 13/11/14 (Resent with full address see below)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Objections to Knowsley Local plan 13/11/14  
**Date:** Fri, 14 Nov 2014 02:19:52 +0000

Dear Mr Howarth,

Following our conversation at the Local Plan meeting last night 13/11/14, please find below, as agreed, a list of my objections to the local plan. I would like to take the opportunity to thank you for agreeing to put these objections forward to the council following a difficult and, at times, frustrating meeting.

- CONSULTATION PROCESS. The local community was not kept informed by Knowsley Council as to the details of the plan or any of its modifications until quite late in the process. As a local resident myself (I live in Greengates, Knowsley Lane) I received a document in approximately 2008 briefly describing the plan but stating that the process was in its infancy and full public consultation would follow. However, the next information I, along with a few other local residents received was the public meeting dates for MODIFICATIONS to the plan, the plan itself having already been agreed. This was in late September of 2014. Speaking to many locals they, and myself, had received NO notification regarding the initial round of consultations. At the public meeting held in Huyton on 9/10/14 I asked Mrs Lisa Harris of the planning department if she could send me details of who had been contacted in the initial rounds and how that contact had been made, via email. She agreed but the information I received from her did not contain that specific information.
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- LOCAL TRADE. Any additional retail facilities may have an economic boost for the area but will also have a detrimental effect on small local businesses which, in these austere times, are struggling already.
- CHARACTER. Although urban, the residents along Knowsley Lane are lucky in that they have so much green space in view at all times, giving the area a suburban feel. Any loss of these spaces would fundementally affect the character of the area, drastically affecting a community that makes regular use of these spaces.

I hope that these points are concise but detailed enough to get across the arguments that I hope to make. My family and I have lived in this area for nearly twenty years now and I think it would be criminal if the nature of Knowsley Lane and it's surrounding communities was destroyed in what many percieve as a land grab by people who just wish to make money at the cost of community and the environment.

Once again, thank you for your time.

Andrew Williams



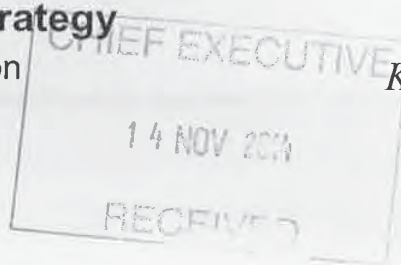


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Proposed Modifications - Consultation  
Representations Form



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**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mrs	Solicitor
Name	Ann Reiberlan	Middleton Solicitors
Job Title (if appropriate)	Retired	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

- a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.
- b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KBGS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I believe the green belt area in Knowsley Village should be saved with only planning permission after full consultation and approval from residents. The Green belt ensures wildlife is preserved and people have access to open countryside. Serious questions need to be asked about plans to build on our open spaces. These include are the roads able to cope, with extra traffic, Are there enough schools, shops doctors and play areas. All of these things need to be taken into account. Our Community would see destruction of the area, and our population swell, so there would have to be more school places. and a great improvement of public transport links not least a decent bus service. The scale of the cuts by the government make such improvements very unlikely and residents should rightly worry, that new estates will be built which will create problems for the future. We will see the loss of our much loved countryside and greenspace and the way nature continue on a separate sheet if necessary... of our communities will change forever.

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

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

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

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

Signature.....  .....

Date 12/11.....November 2014



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

#### **RETURNING THIS FORM**

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

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

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

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

#### **PART A – PERSONAL DETAILS**

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

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

M168

Policy Ref

SUE1 &  
SUE2C

Paragraph Ref

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

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

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

I do not believe the proposed modification is legally compliant.

The proposed modifications did not accord with the Council's **Statement of Community Involvement (SCI)** which sets out how the Council aims to involve the community when it prepares or revises Local Plans. There has been a limited amount of information on this scheme from the council and as a resident of Whiston I have only heard about the plans within the last two months from two community Facebook groups. I have received no information from the council or invitations to consultation meetings etc.

I also believe that the proposed modifications have had regard to the **Sustainable Community Strategy (SCS)** for Knowsley. On page 4 of this document it states the council's goals as being to "improve Knowsley the place" and wanting to achieve "Quality infrastructure and environment". I do not believe that allowing the greenbelt areas to be turned into housing estates will improve Knowsley and will certainly not achieve quality of the environment.

The area that is intended to be redesignated as fit for housing development is an area of the countryside that will never be regained. It is valuable in terms of its flora and fauna, providing green, breathing space for residents and giving Whiston a feeling of being a separate entity, and not part of the urban sprawl of Huyton or Liverpool.

I am also concerned about the implications for the travel infrastructure. Getting onto the M62 and M57 is already difficult at peak times and building thousands of new homes near to this junction would only exacerbate the problem.

I am also concerned about the impact on the local education and health provision. Will a new primary school be built for these new residents, or are there plans to increase the size of the present schools (perhaps by building extra classrooms on playing fields?). Has research been carried out into the capacity of the local doctors' surgeries and dental practices?

Neither do I believe that the proposed modification is sound.

In order for it to be sound, according to the council, "*The Plan should be founded on a robust and credible evidence base involving: evidence of participation of the local community and others having an interest in the area; and research/fact finding: the choices made in the Plan are backed up by facts.*"

The local community has not been involved in drawing up this modification and has not been invited to participate. In fact, the local community is completely opposed to it and has organised itself against the modification. Many local residents, including those living within 200m of the land, have not received any information from the council. The only reason I was aware of the council's proposals is because of the groups set up by the community in opposition. The council could learn lessons from the local community in how to involve people and communicate.

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

I believe the plans to redesignate the Whiston greenbelt should be abandoned. A full enquiry involving all the community needs to be held.

I believe the council has put forward proposals regarding brownfield sites in the local area. This should be revisited and further options investigated. Further research should be done into whether so many new homes in Whiston are actually **needed now**.

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

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

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

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

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**Signature**



**Date** 11th November 2014

[REDACTED]

---

**From:** b kirkwood [REDACTED]  
**Sent:** 07 November 2014 12:29  
**To:** [REDACTED]  
**Subject:** Knowsley Local Plan - Release of Land from Green Belt - KNOWSLEY VILLAGE

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I wish to register my objection to the proposal in the Knowsley Local Plan to release the green belt land adjacent to Knowsley Village.

I consider that the process being followed is flawed in that in adequate notice and consultation has been carried out.

There are no evidence of very special circumstances required to override the harm to the Green Belt. the development would have a detrimental impact on highway safety due to the new accesses.

The development would mean more car journeys into the village, which is already conjested and unsuitable for the increased traffic.

It will damage the special landscape character of the area.

Also, the local plan is being portrayed as the Knowsley Village green belt being "safeguarded until 2028".

I believe that the local residents are being misled in that if the Local Plan is approved without Knowsley Village being removed, developers will be able to submit planning applications from April 2015 with actual construction commencing soon after.

The "safeguarded until 2028" statement is incorrect and the Local Plan is misleading.

Please ensure that my comments are passed onto the Inspector asap.

Regards

B. Kirkwood  
[REDACTED]



**From:** b kirkwood [REDACTED]  
**Sent:** 13 November 2014 20:59  
**To:** [REDACTED]  
**Subject:** Local Plan - Objection to Knowsley Village Green Belt Proposal

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I wish to object to the proposed modification to of the Knowsley Village Green Belt as in my view the proposed modification is not legally compliant or sound.

It is considered that the plan is not legally compliant because the level of consultation is insufficient, the nature of the change is so extensive that all the residents of Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through localism agenda

The proposed changes to the Core Strategy to take out Green Belt 58.29ha of land at Knowsley Village are unsound. The relevant policies CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose to remove the site (KGBS6) from the Green Belt and it's safe guarding until after 2028 to meet housing needs within Knowsley unless a demonstrate need prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case Knowsley Council rely on a perceived need after 2028 to justify the release of the land now. In the field of planning need in particular it is inherently difficult to predict the level of need 14 years ahead – it can be no more than speculative.

Furthermore, there maybe alternatives to developing this Green Belt.

The proposal to develop more than 58ha of Green belt land at Knowsley Village represents a completely disproportionate extension of Knowsley Village. It will not protect what is locally distinctive about Knowsley Village, nor will it protect the character and quality of one of the most rural of the village on Merseyside. With one of the best village cores, contrary to the vision and objectives set out in the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

Knowsley Council have recognised that Knowsley Village is not well served by public transport and only a limited range of services exist. Inevitable, Knowsley Council have concluded that site KGBS6 would be a location where car dependency would pre-dominate which is not going to significantly change the measures that may be mentioned in any transport plan for the site. It is inherent that the site would foul of the Principles of the Core Strategy policy 2 – the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environment limits of the location (refer to the Core Strategy p39, and NPPF para 84).

The development density of the proposal is greater than other sites proposed in Knowsley, which is unsound in over promoting excessive development density. The removal of the Green Belt land purely for housing need is sensitive which is contrary to Government guidance. The proposed development density is disproportionate to other proposals within Knowsley.

Please forward my objection for the inspector to decide that the land proposed in site KGBS6 should remain within the Green Belt.

Regards

B Kirkwood





Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

RECEIVED  
14 NOV 2014

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

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

### PART A – PERSONAL DETAILS

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation BARBARA ANDERSON

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

Modification Ref KGBS14 WILKINSON SOUTH Policy Ref   Paragraph Ref EC1-622 B1  
~~EC1-642 B1~~

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

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

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

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

*Continue on a separate sheet if necessary...*

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

Green Belt land should only be released when existing Brown Field Sites have been developed.  
Traffic in the area will be increased greatly on the local roads.  
The air quality will be effected, the area is already surrounded by Motorways (M62 & M57) causing pollution.  
The only remaining farming land in Whiston will be lost.

Continue on a separate sheet if necessary...

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

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

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

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Signature 

Date 8-11-14



Knowsley Council

# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



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

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	Solicitor
Name	BARBY LUCAS	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

- a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.
- b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.



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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

- A completely disproportionate extension of Knowsley Village not sustainable by current infrastructure. Traffic congestion, schools, shops, roads not sufficient to accommodate 50% increase in housing stock.

- Value of current properties will be eroded.

- Destruction and changes will affect nature of village and outlook.

*Continue on a separate sheet if necessary...*

- No residents been consulted in time to implement

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

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

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

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

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

Signature.....



Date: 11/11/14 November 2014

**From:** Barry Worrall [REDACTED]  
**Sent:** 14 November 2014 10:34  
**To:** [REDACTED]  
**Subject:** Knowsley Local Plan Representations Form  
**Attachments:** Knowsley BC Local Plan Form Barry Worrall.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Here is my objections form to the proposed Knowsley BC Local Plan. Also a web link to the 38 Degrees petition against the planned building on Halewood's Green Belt Land.

link:

[you.38degrees.org.uk/petitions/save-halewood-s-green-belt?source=facebook-share-button&time=1412704815](http://you.38degrees.org.uk/petitions/save-halewood-s-green-belt?source=facebook-share-button&time=1412704815)

Thanks

Barry Worrall

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Barry Worrall	
Job Title (if appropriate)	Fine Artist	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

1. Statement of community involvement  
Very little community involvement.

2. Town & Country Planning  
Where have these been available from, nothing through the doors (leaflets/info etc)  
Small minority of Halewood residents informed, i.e. those directly affected. What about the wider community who will also be affected?

3. Sustainability Appraisals  
1 Loss of green belt protected lands/doomsday book  
2 loss of public space including public footpaths  
3 building on a natural flood plain  
4 vast increase in traffic  
5 no provision seen for increase in public transport  
6 significant loss of wildlife  
7 More people means huge drain on existing services

*Continue on a separate sheet if necessary...*

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

Make proposal more widely available and give people more opportunity to voice concerns, by informing them of open meetings.  
Few people knew of the appropriate form to complete in order to raise objections.  
TEC Planning  
Should have been a large display in the Halewood Centre giving details of all the meetings and where to get information form.  
The small planning proposed site should have been placed in more locations than on a lamp post/telegraph poll, even that hadn't been secured properly and was on the ground  
Wider catchment of people rather than just those in Baileys lane needed to be informed. This will affect most of Halewood village due to construction traffic and mess, also a drain on resources such as education and health services in the larger community.

I have set up a online petition through 38 Degrees website and have received 1005 objections to the proposed local plan.

Website URL for Petition

[you.38degrees.org.uk/petitions/save-halewood-s-green-belt?source=facebook-share-button&time=1412704815](http://you.38degrees.org.uk/petitions/save-halewood-s-green-belt?source=facebook-share-button&time=1412704815)

Please see separate sheet for screen shot of web page

*Continue on a separate sheet if necessary...*

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

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

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

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

Signature



Date 12/11/14

# SAVE HALEWOOD'S GREEN BELT

TO: KNOWSLEY BOROUGH COUNCIL



*We urge the council not to consider building on the Greenbelt or farmland, but to utilise many of the other concrete areas within Knowsley. These would more than meet the current housing demand.*

## Why is this important?

What it would mean to the local community:

- The loss of a tremendous amount of Greenbelt and farmland.
- The loss of wildlife in the woodlands.
- The loss of valuable open spaces.
- Disruption of pathways.
- Loss of natural break from the other nearby communities, creating an ugly urban sprawl.
- An over capacity for local schools and doctors.
- Heavy traffic on local roads which are not suitable for the amount of housing proposed. They are already heavily used and always in a poor state of repair.
- More excessive housing would increase the carbon footprint.
- Halewood would lose its heritage. It was in the Domesday Book of 1086.
- Keep Halewood Cleaner, Safer and Greener.

1,003

of 2,000 signatures



Category: [Planning/Countryside](#) [Environment/Energy](#)

Campaign created by Barry Worrall



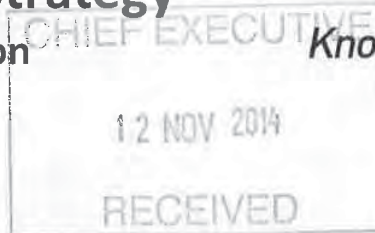
This web page was set up to allow people to voice the objections to Knowsley Borough councils proposed Local Plan, the site has received 1005 signatures up to now..



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council

**RETURNING THIS FORM**

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

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

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

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

**PART A – PERSONAL DETAILS**

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation Patricia Berry

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

Modification Ref WHISTON  
South Policy Ref KGBS 14 Paragraph Ref S752  
E10

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

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

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

I object to the plan to build houses on the greenbelt land in Whiston. Building so many houses with little infra structure, would do untold damage to Whiston Village. We are near a motorway and Whiston village is often grid locked with traffic. New housing estates would make the traffic congestion so much worse.

*Continue on a separate sheet if necessary...*



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

We need more consultation for planning change.

There are other options to the proposed plan

i.e. using Brownfield sites

improving the housing stock.

Knowsley already has (there are many empty properties in Knowsley.)

IT would cost less to improve stock, than build houses that Whiston does not need.

Continue on a separate sheet if necessary...

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

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

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

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

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Signature



Date

1/11/2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Bess Smith	
Job Title (if appropriate)	Treasurer	
Organisation (if appropriate)	Cronton Pathways Walks for Health	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

Bess Smith Cronton Pathways Walks for Health

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

Modification Ref

M055 to  
M065

Policy Ref

CS1, to CS5,  
SUE

Paragraph Ref

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

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

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

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion, especially as most of my neighbours have only just heard of the proposals to build on Green Belt at South Whiston. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states “Planners must protect our Green Belt” see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case.

More recently Prince Charles has written in Country Life magazine warning that the majority of people have “lost any real connection with the land” as he outlined his concerns about the future of the countryside, (theguardian.com, Wednesday 12 November 2014). This should surely make planners reconsider the impact of losing green belt land in an area prone to urban sprawl

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

I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings. Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touches Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton. Cronton is already hemmed in on the east and south sides due to Halton building on greenbelt. . As a volunteer-led walking group under the banner of Walking for Health we have been developing walks for local people in our local area for 3+ years. If this development goes ahead many routes will be lost to us, as it will not be a pleasant environment in which to walk for health.

Is Not consistent with National Policy.

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

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

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

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Signature

████████████████████

Date 12.11.2014

32



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

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

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	ML	Solicitor
Name	BUTCHARD	Middleton Solicitors
Job Title (if appropriate)	CLERK	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether it can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

PLEASE DO NOT DESTROY OUR VILLAGE PLEASE

*Continue on a separate sheet if necessary...*

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

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

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

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

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Signature.  .....

Date 12/11/14 November 2014



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 November 2014 09:46  
**To:** [REDACTED]  
**Subject:** FW: Development plans  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**From:** Carol Blakeborough [REDACTED]  
**Sent:** 13 November 2014 17:08  
**To:** [REDACTED]  
**Subject:** Development plans

Dear Madam/Sir,

As a resident of Halewood I am writing to voice my objection to the plans for building 1204 homes on Greenbelt land from Higher Road through to Lower Road and beyond.

Whilst I'm very aware of the need for more housing I object to these plans for several reasons;

- 1) Greenbelt land should only be built on in special circumstances, as indicated by Eric Pickles MP, these precious 'lungs' allow for recreational space and some sort of barrier to constant urban sprawl. If these plans go ahead there will hardly be a break from Liverpool docks to Widnes given that Halewood already merges with Hunts Cross/Speke and Woolton and Gateacre
- 2) This volume of building would change what has eventually become a fairly settled community and change the nature of that community
- 3) There would be a need for changes to the infrastructure - which clearly did not happen during the expansion of Halewood around the Okell Drive area. That number of people would need at least one extra school and medical centre and I dread to think of the impact on traffic. I live on Higher Road and it can take 10 mins to get off our drive as it is. Would there be any community facilities to allow for things like Parent & Toddler groups, uniformed organisations etc?

Whilst I realise developer's will make much more profit from ripping up large swathes of land and building large developments it would be much better for our communities to have small developments in pockets of unused land. We also need to ensure that any plans include affordable housing for sale and rent.

I do hope you will inform appropriate members and officers about these concerns and the lack of a well publicised public consultation.

Best wishes,  
Carol Blakeborough

[REDACTED]



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE **Knowsley Council**

12 NOV 2014

RECEIVED

### RETURNING THIS FORM

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

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	
Name	CAROL WARING	
Job Title (if appropriate)	HAIRDRESSER.	
Organisation (if appropriate)	NA.	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

CAROL WARING

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

Modification Ref

Whiston  
South

Policy Ref

KYBS 14

Paragraph Ref

E.1.57.E5

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

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

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

I object to the plans do build dwellings on green belt land in Whiston as apart from the affect it would have on the wildlife, the schools would be over crowded, the traffic can be already congested at times.

Continue on a separate sheet if necessary...

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

Use and utilize brown field land in the first instance and use empty properties and better consultation would be greatly appreciated.

Continue on a separate sheet if necessary...

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

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

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

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

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Signature



Date

1 / 11 / 14

[REDACTED]

---

**From:** peter critchley [REDACTED]  
**Sent:** 13 November 2014 10:27  
**To:** Knowsley Local Plan  
**Subject:** Objections to local plan core strategy modifications

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mrs Clare

Critchley

[REDACTED]

[REDACTED]

[REDACTED]

**RE; Knowsley Local Plan; Core Strategy proposed modifications**

I have only recently heard about what Knowsley Council is proposing and feel that the consultation has been inadequate. I would have liked the opportunity to attend the public inquiry sittings (held in November 2013 and July 2014) had I known about them at the time. Can I request for the public inquiry to be re-convened, as I believe that I have not had the opportunity to make adequate representation. I am aware that Knowsley Council have recommended that standard response forms are used for representation, but having read one of them, I am at a loss how to complete it as it is incredibly difficult to understand and complete, so I have sent you this email to show my representation instead.

I object to the proposals on 5 grounds, listed below;

- 1) TRAFFIC CONGESTION - This will increase due to the proposal of new housing, which means more cars. It would make everyday life harder as it will take longer to get around locally.
- 2) THE LOSS OF GREEN FIELDS - My family and I value the fields where the development is proposed as we regularly take walks around there early evenings and weekends with our dog.
- 3) PUBLIC SERVICES - I am concerned about impact more people living in the area will have on our already full local schools, GP surgeries, dental practices etc.
- 4) WHISTON'S IDENTITY - we will lose the last accessible piece of greenbelt land in Whiston , changing its identity to a more urban place to live with very little rural identity would not be a place I would wish to continue living in with my children, as I like raising my children in an area where they can appreciate their urban surroundings.
- 5) USE BROWN FIELDS FIRST - There are no exceptional circumstances to justify the destruction of the long established Green Belt land in Whiston. There are enough brown field sites within Knowsley for over new homes.

I hope that my objections are clear and my form of representation is acceptable.

Regards

Mrs Clare Critchley

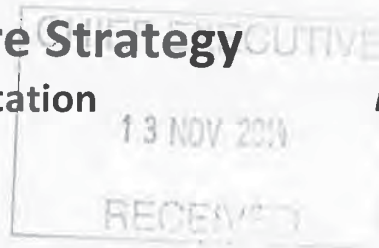
# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council



#### RETURNING THIS FORM

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

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	COUNCILLOR	
Name	IAN SMITH	
Job Title (if appropriate)	LEADER OF THE LIBERAL DEMOCRAT GROUP	
Organisation (if appropriate)	PRESCOT TOWN COUNCIL	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

TOWN COUNCILLOR IAN SMITH, PRESCOT

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

Modification Ref  Policy Ref  Paragraph Ref

*Spatial Strategy 5 Page 5 & SUE 1 to 2C.*

*←*  *C5 5*  */*

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

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

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

Knowsley Local Plan : Core Strategy - Technical report - Spatial Profile Final Version - Core strategy submission document July 2013 Page 65  
Key issues Prescott identifies • Land at Cart Lane, to the west of Prescott (for employment uses) NO MENTION OF HOUSING! as outlined in the modification document. Definitely No community involvement with this change, not legally compliant or sound!  
The government guidance changed following Eric Pickles announcement prioritising Brown field sites (2014). Remove policies SUE1 - 2C!  
Communication with local residents & community groups has been sadly lacking in 2013 and 2014 calling into question the plan's legality and soundness.  
Both sites in Prescott clearly measure up to the criteria of the National Planning Framework, Knowsley's Spatial Strategy 5 (page 53) 5.4.0 - the five purposes of including land in the green belt apply to Cart Lane, Prescott and land bound by the A58 known as Whitakers triangle. 'The process by which sites have been chosen is flawed,' comment Continue on a separate sheet if necessary...  
of the Inspector in November 2013

*A total revision of Green belt policy is required!*



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

There should be a return to the original Local Plan produced in 2013 with added protection for green belt sites.

The authority will prioritise brownfield sites for new house building and supplement capacity by proactively tackling the issue of empty properties in the Borough.

Greenbelt boundaries will be protected from development and the gaps between settlements merging be protected.

The five purposes stated in the National Planning Framework will be adhered to by the authority. Consultation with residents and local groups will be more wide ranging than just informing the minimum amount required by law. We understand that post goes astray and in this case many residents who should have been informed by law were not! Continue on a separate sheet if necessary... Remove Policies SUE 1 to 2c.

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

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

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

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

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

Signature



Date 11th November 2014

13 NOV 2014

RECEIVED

To:-

Local Plan Team  
 Knowsley M.BC  
 1st Floor Annex  
 Municipal Buildings  
 Archway Road  
 HUXTON L36 9YU



Knowsley Liberal Democrats  
 [REDACTED]

11th November 2014

Dear Sir, Re: Knowsley Local Plan - Public Consultation.

It is hugely disappointing that the Council failed to publicise the examination of the Core Strategy more widely in 2013, and advertise more comprehensively the modification document in 2014.

There has been a serious lack of communication and dialogue with local residents and community groups as a result, calling into question the soundness of the plan.

As a local councillor with over thirty years service, I have been disappointed to find out from neighbours that they have had no notification of the process. Complaints include residents who live within 200 meters of the greenfield sites in Prescot.

The Council has admitted to just doing the minimum required to communicate the process to the public. This renders the consultation process flawed and unacceptable.

Knowsley Council must take into account the constraints which are in place to protect green belt land.

This has recently been highlighted by Eric Pickles MP, Communities Secretary who says "local people don't want to lose their countryside



Knowsley Liberal Democrats

to urban sprawl or see the vital green lungs around their Towns used for unnecessary development. Today's guidance will ensure Councils can meet their housing needs by prioritising brown field sites, and fortify the green belt in their areas." The modification document 'flies in the face' of the latest guidance from Government.

The site at Carr Lane, Prescott is a small area of land which helps provide an essential buffer between Prescott and Huyton. Any development will erode this gap, contributing to merging settlements.

There are already 600 houses being built on land adjacent to the Carr Lane site. The site is also adjacent to Prescott brook and fishing ponds with wildlife habitats, wild meadows and recreational green space, an essential part of the green gap between settlements.

The site bounded by the A58, known as Whitakers triangle. Prescott also helps provide an essential buffer between Prescott and Huyton and is hugely important as it sets the scene as you enter the Town of Prescott, a unique historic town from the West. Ahead is Prescott Parish Church (a grade one listed building) which can be seen clearly when approaching from the West.



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Part of the site is clearly in the conservation area and should not be changed. Access to the site is impossible from the A58 (see the Technical report by KMBC DRN 20 July 2008) "in the interest of highway safety and movement." Access to the site from Knowsley Park Lane and or Liverpool Road would add to the existing traffic chaos that is evident due to school traffic and an increasingly, very busy (A51) dual carriageway leading up to the Town Centre.

It should also be taken into account that five huge pipes (water mains) from Prescot reservoir that serve Liverpool run under and directly across the site.

At the north end of the site there are school playing fields which should not be developed, if anything they should be expanded.

I'm also concerned that the Council Core Strategy documentation only refers briefly to this site, habitat surveys would be vital as it is a valuable wildlife area and important site close to Knowsley Safari Park.

Both Prescot sites have long established green belt boundaries and should not be altered, and given the status of 'safeguarded land,' as in Knowsley Village (Policy Suel, 2.)

The modification document 'slashes' through the constraints



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within the Local Plan Spatial Strategy, that protects the green belt. Surely with 5,222 new properties that can be built on brown field sites and another 2,000 plus empty properties in the Borough the Councils plan for the early release of green belt sites is not sound.

The National Planning Framework, see Knowsley's Spatial Strategy 5 (page 53) 5.40 states the five purposes of including land in the greenbelt are ...

1. To check unrestricted sprawl of large built up areas.
2. To prevent neighbouring Towns merging into one another
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic Towns.
5. To assist in urban regeneration encouraging the recycling of derelict land and other urban land.

All five criteria apply to the Carr Lane site and at least four criteria 1-4 apply to Whitakers Triangle.

Ed Miliband MP (Leader of the Labour Party) on 9th May 2011 on the BBC Politics Show said, "A main priority of my party is to stop the destruction of what people value in their community."

In Prescot this definitely includes our scarce green belt sites!



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Each site in Prescot is prone to flooding with Prescot Brook flowing through and adjacent to both sites. Knowsley Council's Sustainable Communities Strategy document states that Knowsley is an area where life expectancy is lower than elsewhere in the United Kingdom, for women by two years and by three years for men. The air quality is worse than the North West average with Knowsley's air having the highest concentration of pollutants of all the districts of Merseyside. The European Union has stated that it will be at least ten years for Merseyside to reach the minimum standard for air quality required.

Further development at these two locations is counter productive to Knowsley being the "borough of choice." As one of the most deprived local authority areas in the United Kingdom we do not want more deprivation by being deprived of green belt land that remains. Significant damage to the environment combined with the loss of the narrow gap between Huyton and Prescot could well result in damaging the social cohesion in our communities. The issue of policing is not addressed or



Knowsley Liberal Democrats

Considered when such large developments are proposed in the local authority area. The impact of more housing estates in an already over developed area is a recipe for increase crime, unrest and damages the well being of residents in longstanding communities.

"Planning is not an exact science! Reasons either way can be made to approve or refuse a planning application."  
(Chief planning officer KSMBC advice to the Authorities Planning Committee)

If planning guidance states that greenbelt land can only be developed in exceptional circumstances - who decides was exceptional? Who guards the guards?

New policies SUE 1, SUE 2, SUE 2A, SUE 2B and SUE 2C, undermine the purposes set out in the National Planning Framework, bringing forward new site allocations and policy guidance which addresses the housing shortfall.

These sites identified in the local Plan were chosen using a flawed process pointed out by the Inspector in November 2013 at the Public examination.

The latest guidance from the Government's Communities Secretary should require the Council to revisit their



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[REDACTED]

modification document. We propose the reinstatement of deleted passages from the Spatial Strategy 5 that protects the green belt by reinforcing the policy. A piecemeal erosion of our green belt in Preocot and surrounding areas within the Borough of Knowsley is totally unacceptable.

Yours faithfully,

[REDACTED]

IAN SMITH - CHAIRMAN  
KNOWSLEY CONSTITUENCY  
LIBERAL DEMOCRATS  
[REDACTED]





# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

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

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	Solicitor
Name	Colin	Middleton Solicitors
Job Title (if appropriate)	Taxi DRIVER	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KBGS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

KNOWSLEY LANE  
IS OVER STRESSED  
AT PEAK TIMES (NOW)

*Continue on a separate sheet if necessary...*

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

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

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

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

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Signature... ..



Date... 3, 11, 14 ..... November 2014



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Colin Spratt	
Job Title (if appropriate)	Civil Servant	
Organisation (if appropriate)	Government	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

**M168**

Policy Ref

Paragraph Ref

Edenhurst Avenue Green Space Sportsfield Site

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

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

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

I OBJECT TO THE MODIFICATION OF USE TO THE EDENHURST AVENUE GREENSPACE SPORTSFIELD SITE.

ANY CHANGE OF USE WILL FURTHER CONGEST AN AREA ALREADY PLAGUED WITH HIGHWAY AND ACCESS CONSTRAINT AND WILL FURTHER INCREASE THE CARBON FOOTPRINT FOR THE AREA.

THE AREA IS SITUATED BETWEEN THE B5178 AND THE END OF THE M62. THE POLLUTION FROM TRAFFIC BETWEEN THESE AREA IS ALREADY HIGH AND TRAFFIC AROUND THESE ROADS IS CONSISTENTLY CONGESTED.

THERE IS NO SOUND INFRASTRUCTURE. THE NEAREST PRIMARY SCHOOL IS OUTSIDE THE BOROUGH AND ALREADY OVERSUBSCRIBED FROM CHILDREN WITHIN THE LIVERPOOL AREA.

THE CONSULTATION HAS NOT BEEN LEGALLY COMPLIANT. THERE HAS BEEN NO PUBLIC MEETING OR FORUM. ONLY A DROP-IN EVENT WHICH PROVIDED SCANT INFORMATION. IGNORING 80% OF RESIDENTS WHO ARE DIRECTLY AFFECTED, LEAVING THEM UNINFORMED ABOUT THE PROPOSED CHANGE OF USE.

RECENTLY KNOWSLEY COUNCIL & LOCAL POLICE HAVE SPENT BETWEEN £25,000 & £28,000 FENCING OFF THE AREA OF THE EDENHURST GREEN SPACE SPORTSFIELD SITE. CUTTING OFF A PUBLIC RIGHT OF WAY. A SITE OWNED PRIVATELY AND ALWAYS ALLOWED ACCESS TO RESIDENTS, WALKERS AND MEMBERS OF THE PUBLIC UNTIL IT WAS SECURELY FENCED OFF.

IT IS CLAIMED INSPECTIONS HAVE BEEN CARRIED OUT AT THIS, AND OTHER SITES, THROUGHOUT THE GREENBELT IN KNOWSLEY, WHICH ARE PART OF THE CURRENT PUBLIC CONSULTATION.

*Continue on a separate sheet if necessary*

THE EDENHURST AVENUE GREEN SPACE SPORTSFIELD SITE IS EXTREMELY SECURE. SO MUCH SO IT IS IMPOSSIBLE TO GAIN ACCESS. THEREFORE, ANY CLAIM OF ANY SUCH INSPECTION IS EXTREMELY FLAWED AND QUESTIONABLE.

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

**USE BROWNFIELD SITES.**

**TWO SUCH ALTERNATIVES ARE:**

**THE OLD BOWRING PARK HIGH SCHOOL SITE ON WESTERN AVENUE IN ROBY IN HUYTON. THIS SCHOOL WAS DEMOLISHED SOME TIME AGO AND AS A FORMER BROWNFIELD SITE WOULD BE IDEAL AS AN ALTERNATIVE SITE.**

**ROBY COLLEGE ON RUPERT ROAD IN ROBY IN HUYTON IS DUE TO BE RELOCATED. THE OLD COLLEGE IS THEN DUE TO BE DEMOLISHED. AS THIS IS ANOTHER BROWNFIELD SITE WITHIN THE AREA THIS HAS BEEN IDENTIFIED AS AN ALTERNATIVE SITE.**

**THE FIRE STATIONS IN PRESCOT AND HUYTON ARE DUE TO BE CLOSED. BOTH OF THESE AREAS HAVE BEEN IDENTIFIED AS ALTERNATIVE SITES.**

*Continue on a separate sheet if necessary*

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

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

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

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

Signature



Date **14.11.14**



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mrs	
Name	Collette Milne	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

Policy Ref

SUE1AppE

Paragraph Ref

2and 6A and

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

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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### **3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

October 4<sup>th</sup> 2014

Eric Pickles said:

This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development. Today's guidance will ensure councils can meet their housing needs by prioritising brownfield sites, and fortify the green belt in their area. Brandon Lewis said: We have put Local Plans at the heart of the reformed, planning system, so councils and local people can now decide where development should and shouldn't go.

The people of Knowsley Village have had six weeks to digest the impact of a plan this council has been planning for over six years. Knowsley Council have made no effort to advertise the Green Belt status changes despite spending resident's funds on various media Knowsley Challenge and Knowsley News for example. The few references made in these documents were at the very best vague mention of housing NO document mentioned green belt. Not even the July 14 Knowsley News edition, when discussions were at a peak. Our own Town Council held meetings throughout 2014 I was fortunate in being able to attend each and every one of these meeting and collect a copy of the minutes. At no point in the hours of discussion did any elected member talk about the proposed unbelievable changes planned despite the fact that 5 of the 16 Town Councillors are also Borough Councillors and had attended all of the full KMBC meetings where these reports were discussed and voted on.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

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Signature



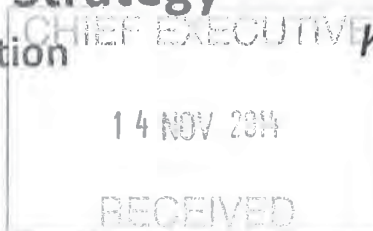
Date

14/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	CYNTHIA JAMES	
Job Title (if appropriate)	SCHOOL ADMINISTRATOR	
Organisation (if appropriate)	WAISTON RESIDENT	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

CYNTHIA JAMES

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

Modification Ref

Mo 55  
To Mo 65

Policy Ref

CS1, 2, 3, 4  
5, SUE, AD51

Paragraph Ref

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

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

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

- ① NOT ENOUGH EXPLORATION OF ALTERNATE BROWN FIELD SITES
- ② POLICIES MENTIONED IN CS1 TO 5, SUE AND AD51 DO NOT CORRESPOND WITH LOCAL PUBLIC OPINION.
- ③ POOR CONSULTATION HAS MEANT NUMEROUS RESIDENTS HAVE NOT BEEN FULLY AWARE OF SCALE OF THE PROPOSALS OR THEIR LIKELY IMPACT ON LIVES OF LOCAL RESIDENTS.

Continue on a separate sheet if necessary...

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

- ① BROWN FIELD SITES AND PRESENT EMPTY PROPERTIES SHOULD BE CONSIDERED FIRST.
- ② CONSIDER IMPACT ON LOCAL ROADS IN PARTICULAR EFFECT ON JUNCTION 6 OF M62 ALREADY CONGESTED AT PEAK TIMES AND VERY CONFUSING TO NEGOTIATE.
- ③ ABANDON PLANS TO BUILD ON GREEN BELT LAND.

Continue on a separate sheet if necessary...

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Signature



Date

11 / 11 / 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

CHIEF EXECUTIVE  
12 NOV 2014

Knowsley Council

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

**PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MR	
Name	DANIEL CHRISTOPHER CASSELLS	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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I BELIEVE WE ARE NOT BEING THE TRUTH ABOUT THE OVERAL EFFECT TO PUBLIC QUALITIES IE COMMUNICATIONS AND WELLBEING.

HOW COME, IN THE PAST, THE POPULATION WERE EMPLOYED, SPEAK OF GOOD MEMORIES WITH THE GREEN NOT TOUCHED.

Continue on a separate sheet if necessary...

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

I DO NOT KNOW SUFFICIENT INFORMATION TO MAKE POSITIVE SUGGESTION.

THE LAST MEETING, WE WERE TOLD SOME QUESTIONS COULD NOT BE ANSWERED BECAUSE, THE TOPICS WILL ONLY BE PURSUED IN STAGES AFTER THE GREEN BELT ISSUES HAS BEEN DEALT WITH. SURELY THE POPULATION WANT TO KNOW ALL ASPECTS TO BE ABLE TO MAKE A DECISION.

SURELY THE BROWN BELTS SHOULD BE LOOKED AT, WE SHOULD HAVE A REFERENDUM FOR THE AREAS CONCERNED.

I REMEMBER WE ELECTED TO <sup>Continue on a separate sheet if necessary...</sup> JOIN COMMON MARKET FOR TRADE

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

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

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

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

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Signature



Date

11/11/2014





# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



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

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MR	Solicitor
Name	Daniel Smith	Middleton Solicitors
Job Title (if appropriate)	Incompetence	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

- |  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

- a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.
  
- b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KBGS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I object to Any houses being built in Knowsley village due to the LARGE Amount of wild life. i.e Rabbits, fox, Buzzards + all different Birds of Prey Plus the fish pond were all young people fish + a summer plus large fields for walking dogs and taking them woods and fields away will Remove any wild life in Knowsley village alot of people like you for walks around this village and will not ~~be~~ be able to due to the amount of cars and TRAFFIC on the Roads will not be able to in a SAFE RELAXING way.

Continue on a separate sheet if necessary...

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Signature...  .....

Date.....<sup>12th</sup>.....November 2014



Knowsley Council

## Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

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

#### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	Solicitor
Name	DAVID BLINKOW	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation DAVID BLINLOW /  
Save Knowsley Village Green Belt Group

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

Modification Ref  Policy Ref SUE1 AppE Paragraph Ref 2 and 6A.9

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

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

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

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Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

All reference to the site Knowsley Village KGBS 5-Pinfold Lane should be removed from the Core Strategy Plan and the area KGBS 5 retained as Green Belt as recommended in the Knowsley Plan-Core Strategy.

*Continue on a separate sheet if necessary...*

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Signature...  .....

P. D. BLINCOU

Date.....<sup>13</sup>.....November 2014



**From:** David Cox [REDACTED]  
**Sent:** 11 November 2014 12:50  
**To:** [REDACTED]  
**Subject:** Release of land from the Green Belt

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam

I wish to object to the local plan to remove land from the green belt status.

### **The lack of proper consultation**

The letter delivered to residents and the form enclosed asks for comments on the modifications to the plan, but there is no clear statement in the letter of what these modifications are. I live within 100m of part of the site under discussion; nevertheless the first I knew of the scheme was when notices were attached to local lamp posts about a month ago. The plan has clearly been under consideration for some time and yet it is only just being brought to public attention. The only public consultation provided was a drop-in event at the Halewood Centre where boards were displayed and council officers were made available to answer questions. This is not what I call consultation.

Members of the public asking questions were referred to formal documents made available on line and for consultation at local libraries. The documents filled a large crate and were technical and legalistic. Ordinary residents are not trained planners and have neither the time nor experience to plough through the material and make sense of it. I have studied some of these documents but failed to get far in the time available. I see absolutely no reason why a simplified outline document could not have been produced for public consumption followed by proper local public meetings. I can only conclude that this is the done deal and that the main aim of the council is to hide the facts from the electorate.

### **The folly of building on green belt land.**

I am in principle strongly opposed to any reduction of the green belt. This belt between Knowsley and Halton is quite small and has already been compromised by the building of the A5300 and the development of the Everton Training Centre. Do we really want a continuous urban sprawl from the Sefton coast extending to the other side of Warrington and the M6. If the green belt is gradually chipped away this is what will inevitably happen and our towns will lose their identity. (The politicians in London seem to want a Northern City Region- they don't have to live here.) The housing requirements need to be considered on a regional basis, matched to employment patterns and making the best use of existing brownfield sites of which there are plenty. It may cost more, but the release of greenfield sites is only going to help large housing developers swell their profits.

### **The folly of building on a flood plain.**

The northern section of the Halewood plan involves building on a flood plain. Have we learned nothing in the last few years. We watched news reports of floods last winter. We know that global warming is going to increase variability in our weather and a rise in sea levels which is highly likely to affect the Mersey basin. Mitigating the problem in areas at risk identified on the Environment Agencies map means, in practice, moving the floods elsewhere. We need to be making more land available for possible flood storage not less.

### **Road congestion and nuisance.**

The addition of as many as 1100 houses in a town the size of Halewood will change the whole character of the town and place a strain on the facilities and communication. Our rear garden backs onto Higher road and in the summer it is already almost impossible to sit in the garden and have a conversation because of the traffic noise. Higher road will be the main E-W route serving the new area so expect a huge increase in traffic. The area at the southern edge of

the site will also be bounded by the main West Coast Railway and the A562 serving the new Mersey Gateway Bridge. People housed on this land will not get much peace, nor will we, and the pollution aspects of this have yet to be considered.

**My details**

Mr D Cox





Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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

#### **PART A – PERSONAL DETAILS**

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

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

M055

Policy Ref

SD32, KGBS14

Paragraph Ref

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

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

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

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. If it were not for the efforts of local community action groups many residents would not know of the proposed developments on greenbelt land.

For such an important public consultation it seems as if the Council have done the minimum required. Hence the LOCAL PLAN is unsound on the basis of the failure of the Council to carry out adequate consultation with the wider public. In particular the policies outlined Doc CS08c M049-65 Policy Ref CS1-SS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: p51: M168 (Doc CS08c: P51) new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC.

The Council should therefore consider re-convening the public consultation process to take note of the views of local residents relating to the GREEN BELT proposals.

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

The COUNCIL should be aware of the new guidance to reinforce green belt protection (October 2014) updated by the DEPARTMENT FOR COMMUNITIES AND LOCAL GOVERNMENT to underline the NATIONAL PLANNING POLICY FRAMEWORK. According to the guidance when council is assessing the availability and suitability of land to meet its housing need during local plan preparations, it should take account of any constraints such as green belt, which "indicate that development should be restricted and which may retrain the ability of an authority to meet its targets". According to the guidance unmet housing need, including for traveller sites, is unlikely to outweigh the harm to the green belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the green belt. Mr ERIC PICKLES is quoted as stating: "This Government has been very clear that when planning for new buildings, protecting the our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or to see the vital green lungs around their towns and cities [used for] unnecessary development. Today's guidance will ensure councils can meet their housing needs by prioritising brownfield sites, and fortify the green belt in their area". Planning Minister BRANDON LEWIS is quoted as stating that "We have put Local Plans at the heart of the reformed planning system so councils and LOCAL PEOPLE can now decide where development should and shouldn't go". Hence the COUNCIL should be heeding this latest GOVERNMENT GUIDANCE and taking note of what THE PEOPLE want in terms of GREEN BELT ie that the GREEN BELT should not be sacrificed. Exceptional circumstances do not therefore exist to justify removing land from the GREEN BELT.

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

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

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

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

Signature



Date 13 NOV 14



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

Knowsley Council

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

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

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	Solicitor
Name	DAVID VEARNCOMBE	Middleton Solicitors
Job Title (if appropriate)	PAINTER	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.



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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I agree with all the statements in this letter.

Continue on a separate sheet if necessary...

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

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

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

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Signature...



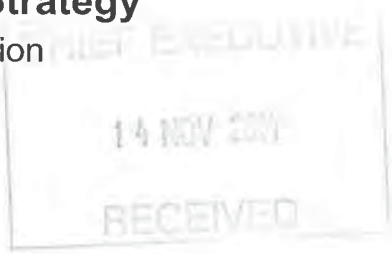
Date... 12<sup>th</sup> ..... November 2014



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



**RETURNING THIS FORM**

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

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	ms.	Solicitor
Name	Dawn Andrews	Middleton Solicitors
Job Title (if appropriate)	RETIRED -	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

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National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

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There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KBGS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I sincerely OBJECT to this plan going ahead. The Earl of Derby's uncle would be turning in his grave, with him selling this land off for Houses. KNOWSLEY VILLAGE has been a village since K.M.B.C. took over from Whiston Council. We don't want to be known as a City. who in their right mind would want to live in a very, very small city. Not only would they build houses, more schools more shops. What we wouldn't have is any more PUBLIC TRANSPORT. I have lived in Knowsley Village all my life apart from (1963-1973) and I've seen a lot of changes all the Private Houses, no EXTRA TRANSPORT. By the way I'm now 71 yrs of age, so don't try and tell me that I don't know what I'm talking about. LORD DERBY SHOULD BE REALLY + TRUELY THINKING ABOUT THIS LATE UNCLE AND NOT HIS OWN POCKET

*Continue on a separate sheet if necessary...*

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

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

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

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

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Signature..



(KNOWSLEY VILLAGE)  
(COUNCIL RESIDENT)  
COUNCIL

Date...12<sup>th</sup>...November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



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

#### PART A – PERSONAL DETAILS

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation DEBBIE KING / LODGE RIDING CENTRE

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

Modification Ref M053 to Policy Ref CS1/CSS/ADS1 Paragraph Ref

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

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

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

For 2 years now, I have tried to highlight the lack of consultation that has taken place given the number of years that these planning changes have been taking place. The last few weeks again has shown just how many people still do not know what is going on in their area. And the few that do seem under the impressions (as some have been told by people at the Planning Dept) that nothing will take place until after 2028! How misleading has this Consultation been?

The shambles of meetings that have been put on to try and inform people in the last few weeks hasn't answered questions - only served up more confusion and contempt!

*Continue on a separate sheet if necessary...*

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

I think we need to start again - and thoroughly inform residents from the beginning. Those that are trying to get to grips with what's happening cannot possibly get up to speed with all the reading, documents and modifications that have taken place. Rushing this planning through now and before 2028 gives people less chance to put <sup>forward</sup> their views and points on the matter.

There has been a lot of confusion, misleading information and lack of caring attitude from those dealing with the Planning decisions. The people of Knowsley - need you to care for their area and listen to them. Continue on a separate sheet if necessary...

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Signature



Date

12/11/14



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

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

re: Knowsley Local Plan (KGBS 14)

Dear Mr.Pike,

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

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

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

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

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

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

\*Whiston Town Council collectively oppose these plans.

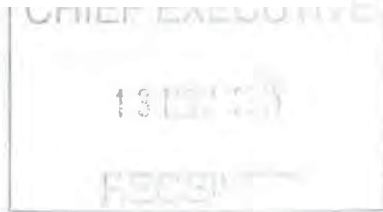
\*Shaun Woodward MP (St.Helens and Whiston South) and Marie Rimmer strongly oppose these plans and have written to Jonathan Clarke to tell him their views (I trust their emails will be forwarded to you).

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

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

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

Mrs. Deborah Lewis



05/11/14

Dear Sir or Madam

As a resident who lives right next to the proposed site indicated on the enclosed form I attended the local meeting at The National Wildlife Centre at Bowring Park 1/10/14 with my neighbours and a number of residents. My particular objective was to meet with the planners and see what was proposed, where and what the boundaries would be? What would happen to the protected trees in the area? The effect of flooding to the surrounding houses and how the site would be cleared as it is a Green Belt site and a valuable piece of environmental habitat for local wildlife. The field has been left derelict for over 30 years and has been used by local people to walk their dogs which they have been allowed to do unmolested and unchallenged.

There are no signs to indicate a planning order on the Sarum Rd side of the site and only Private land signs have gone up.

At the meeting we were given no information on how the site would look, there were no planners or members of the council there and we were sent away no wiser. We were advised to put all our objections on the said form and our questions would be put forward.

The form enclosed was given out to the local residents to complete and is in fact a legal document that would be impossible for a layman to outline their objections.

In summary this planning application by the Council is not justified as in my view they have not listened to or attempted to seek the views of the local people. This small piece of land provides us with trees and a green space that breaks up the areas of housing, an environment for a host of wild animals, plants and protected trees. It also provides a barrier from the noise of the M62 and a valuable "lung" for the area. It is an area of potential flood risk so will cost thousands of taxpayer's money to correct before building and will not improve our surroundings due to the increased noise and traffic flow. My windows look directly onto the site and personally I feel uninformed on what is happening. The council website is not helpful as it is confusing and hard to negotiate.

I would ask that you and your colleagues review the planning application on our behalf as residents as we are faced with a very confusing and overly jargon packed application that makes it an intimidating process to try to find out how this plan for development will affect us as a community. This small piece of land is very precious to us and although I do understand the need for further housing, as Knowsley Council have indicated on their website, because of the increase in population and the Government Support in allowing Green Belt land to be built on. I for one would like to be sure they have considered very carefully every possible alternative.

Best Wishes

Debra Murphy

Cc Maria Eagle Mp

Cc local planning office

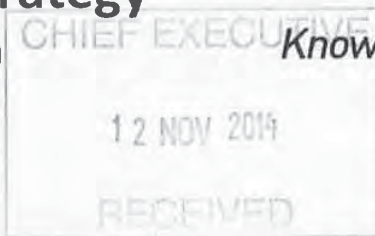
Cc Campaign for Rural England

Cc Local councillors Liverpool /Knowsley Area



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

### RETURNING THIS FORM

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

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

#### PART A – PERSONAL DETAILS

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

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

MR. DEREK MUIRHEAD

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

Modification Ref

WALSTON  
SOUTH

Policy Ref

LGBS 14

Paragraph Ref

E1 - E11  
S1 - S8

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

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

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

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

Continue on a separate sheet if necessary...

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

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

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

• CONSULTATION WIDELY TO DETERMINE NEEDS, REQUIREMENTS AND INFORMATION

*Continue on a separate sheet if necessary...*

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

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

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

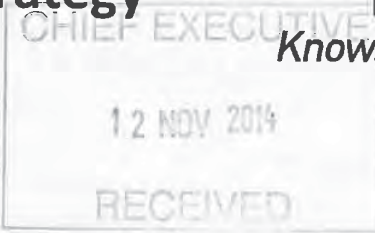
**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature  Date 01 - 11 - 14



# Knowsley Local Plan: Core Strategy

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

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MIR	
Name	DONALD MCCORMACK	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

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

I BELIEVE PARAGRAPH E1 IS UNSOUND BECAUSE AS A RESIDENT OF HALSENEAD PARK THE AREAS ALLEGEDLY NOT TO BE DEVELOPED I.E OLD WOOD AND BIG WATER OR WELL AS THE VALUE OF MY RETIREMENT HOME AND 140 OTHERS WOULD BE SEVERELY AFFECTED BY ANY OF THE PROPOSED DEVELOPMENT. THESE FEATURES WOULD BECOME ISOLATED AND UNTENABLE TO THE RESIDENTS OF HALSENEAD IN PARTICULAR AND WHISTON IN GENERAL.

THE MAJORITY OF RESIDENTS ON HALSENEAD PARK ARE RETIREES WHO MOVED THERE FOR A PEACEFUL AND HAPPY RETIREMENT. THESE PROPOSALS WOULD BE THE DEATH KNEEL FOR MANY OF THEM AND THE COMPLETE DEVALUATION OF THEIR HOMES.

*Continue on a separate sheet if necessary...*



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

The inspector should take note of the comments made by Mr Eric Pickles M.P. regarding his deep concern re not building on any Green belt.

Also the inspector should convene another public meeting as I was not able to understand the Jargon and technical issues at the first consultation.

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature



Date

1/11/14



Knowsley Council

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

**PART A – PERSONAL DETAILS**

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

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation D. DAW.

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

Modification Ref MO 78  
M168  
M 272 Policy Ref CSS  
SUE1 SUE2 Paragraph Ref  

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

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

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

I strongly wish to object to the proposed modifications and in my view believe that the proposals are not legally compliant or sound as there was no positive preparation on the accurate infrastructure on roads, traffic congestion health and safety, schools and GP services. It is not justified as there was no consultation with local residents by letter. It is not in my view effective as it will just cause more overcrowding and hazards and compromise health and safety. My proposal is to use brown belt area first for example - old Bicc site off carr lane, Scotchbarn lane after removing old school and destruction of the swimming baths.

*Continue on a separate sheet if necessary...*

**CONTINUED\***  
please see attached letter

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

please see attached letter.

my suggestion to the modification would be to consider all aspects of Health and Safety to the residents of the area in particular school children and what the increase in traffic would bring.

To use all brown belt areas first and to consider the views and opinions of all local residents and to write to them first about any proposals to the change and removal of green belt areas.

*Continue on a separate sheet if necessary...*

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

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

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

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

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Signature



Date 10-11-14

MODIFICATION REF M078 M168 M262

I am writing with regard to the proposals for Knowsley Council to remove areas of Greenbelt areas around Prescott Whiston Croxtan Halewood and Kirkby, in the Knowsley Borough.

I appreciate the fact that this is a decision prepared by Government and forced upon Knowsley Council however I do not feel that this is the right decision and the considerations of the residents already in these areas have not been sought.

The actual considerations of the area and the preservation of Greenbelt areas have not been taken into account but merely used for selling off land to build houses for a huge profit to housing developers.

I suggest that Knowsley Council should use all brownfield sites first before even considering to use Greenbelt areas.

The infrastructure in this area cannot cope with such a huge increase in houses.

There are no jobs to support the increase in people and public transport and roads, links are already overcrowded and health and safety would be compromised.

With reference to the proposed area off Prescott by-pass, this road is constantly congested at peak times and accidents are often recorded at the junctions, please check on these statistics so how could any further housing / people / cars be sensible to add to this congestion.

Recently a survey was carried out at the end of Knowsley Park lane to change the road / pedestrian structure for the health and safety of the new school - Knowsley Centre for Learning in Prescott, the health and safety of the children in this school would be compromised if more cars, traffic and congestion would be created by added unnecessary houses in this area.

This area is already congested and the building of more houses would produce even more hazards for school children with increasing traffic.

The development will also cause more problems for people trying to register with GP surgeries - Prescott GP are all full and I can never get an appointment when I need it

All schools in the area would be over stretched along with local amenities, and hospital services and appointments, as well as the increase in council services too.

In Prescot this is the only remaining patch of greenbelt in the area and it would make sense to built on brown belt areas first thus preserving the heritage of the area around Knowsley Estate

My main concern is that at no stage have the residents of these areas been consulted about the removal of greenbelt areas and that this has just been a decision made by Government to sell off valuable land for huge profits with no consideration for residents nor the conservation and importance of greenbelt Land.

Loop-holes have been used to pass this decision with little or no appropriate consultations with residents and with no consideration of the impact to the area on the removal of valuable greenbelt land. in my opinion.

Thank you for taking the time to read my concerns, I wish there could be a reversal to these proposals but I expect the Governments decision will be final regardless of any residents views!

**FRIENDS OF BROWN'S FIELD & SOUTH AVENUE  
RESIDENTS' ASSOCIATION**



12 November 2014



Dear Sir/Madam

Re: Knowsley Local Plan – Public Consultation, Land bounded by A58  
(Whitaker's triangle) and at Carr Lane, Prescot

As Chairman of the Friends of Brown's Field and South Avenue Residents Committee, I am writing, on their behalf, to object to the proposed modifications to Knowsley's Local Plan.

The modifications put forward by Knowsley MBC on our behalf are unacceptable and unsustainable. This is yet another example of Local Government chipping away at our Green Belt land in Prescot through piecemeal erosion, ignoring current planning guidelines which are designed to reinforce the protection of the Green Belt.

The guidance states that when a Council assesses the availability and suitability of land to meet its housing need during Local Plan preparations, it should take account of any constraints such as Green Belt which 'indicate that development should be *restricted* and which may restrain the ability of an Authority to meet its needs'.

Eric Pickles MP, Communities Secretary, stated that 'Local people don't want to lose their countryside to urban sprawl or see the vital green lungs around their towns used for unnecessary development. Today's guidance (2014) will ensure Councils can meet their housing needs by prioritising Brownfield sites and fortifying the Green Belt in their areas'.

The sites at Carr Lane and the land bounded by the A58, Prescot (known as Whitaker's triangle) are both areas of Green Belt which help to provide an essential buffer between the major settlements of Prescot and Huyton. These are established Green Belt boundaries and should *not* be altered.

Knowsley MBC has severely weakened the constraints within the Local Plan protecting Green Belt, for the purpose of its early release for development in 2015. This is totally unacceptable to us and flies in the face of Eric Pickles' announcement.

There are 5,222 new properties that can be built on Brownfield sites. Prioritising Brownfield sites and occupying empty properties within the Borough – of which there are over 2,000 – would practically meet our housing needs and would be an acceptable way forward.



Referring to the National Planning Framework included in Knowsley's Spatial Strategy 5 (page 53) 5.40, the 5 purposes of including land in the Green Belt are:

1. To check unrestricted sprawl of large built up areas.
2. To prevent neighbouring towns merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Both sites currently meet the first four criteria set out above.

There is widespread public concern and unrest about the modifications to Knowsley's Local Plan regarding the Green Belt.

I and my colleagues would question the soundness of the Plan since there has been a total failure to communicate effectively with Residents and Residents' groups including our own in South Avenue.

Given the new guidance issued earlier this year, we propose that Knowsley Council revisit and review their Local Plan, working with Residents' Groups and local people at every level and in all aspects of the process.

A new Plan should provide a more strategic approach, protecting the Green Belt as this is crucial to the health and wellbeing of present and future generations for both people and wildlife.

Yours faithfully



Mr Douglas Thurgeson  
Committee Chair of the Friends of Brown's Field & South Avenue Residents'  
Association

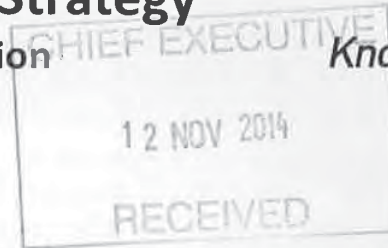
Local Plan Team  
Knowsley MBC  
1<sup>st</sup> Floor Annex  
Municipal Buildings  
Archway Road  
Huyton  
L36 9YU



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## Proposed Modifications - Consultation Representations Form

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

#### PART A – PERSONAL DETAILS

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation Elaine Rowe

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

Modification Ref MOSS  
MOGS Policy Ref CS16CS  
SUEADSI  
5031 Paragraph Ref 3-20 3-21  
3-23 3-34  
3-26 4-10

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

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

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

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

Continue on a separate sheet if necessary...

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

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

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature



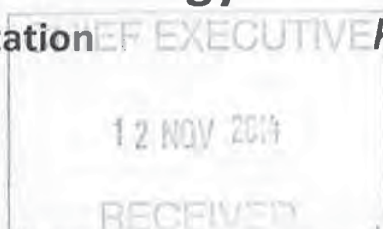
Date

1/11/14



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

### PART A – PERSONAL DETAILS

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

MRS. ELESTA MUIRHEAD

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

Modification Ref

WHINSTON  
SOUTH

Policy Ref

KG65 14

Paragraph Ref

E1 - E11  
S1 - S8

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

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

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

I strongly object to the plan to build a minimum of 1503 properties on the greenbelt of South Winstan. I am extremely concerned about the negative impact on our local environment consequent to eradication and total destruction of our wildlife and natural resources which are so vital to health and well being. Poor environmental conditions do cause stress, isolation, ill health, poverty with subsequent increase in dependence on social benefits.

Continue on a separate sheet if necessary...

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

I consider that further consultation, wise reference to historical changes in other societies/localities which were changed at whim and destroyed subsequently.

I think that Brownfield sites should be developed to release apparently useless land for the very purposes that Greenbelt land is being destroyed. If the ancient environment is improved, we would see the beneficial impact on health, ~~and~~ education, wealth, social status, universal benefits.

Restore Empty and rundown properties for use.

*Continue on a separate sheet if necessary...*

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

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

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

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

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

Signature



Date

01/11/14

**From:** Emma Turton [REDACTED]  
**Sent:** 29 September 2014 22:21  
**To:** [REDACTED]  
**Subject:** Local plans Knowsley Lane Green belt.

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Having recently received the letter with regards to the public consultation on the release of land from the Green Belt in Knowsley lane, I have looked on the website address that you have given but unfortunately the information is not clear or specific as to how this will impact on our home in particular.

We live at 226 Knowsley Lane, in a beautiful listed cottage that sits on Derby's estate just in front of the woodland copse on the greenbelt and are apprehensive to say the least about both the financial and social implications that the planned changes will have on our home.

I intend to view the plans when I have opportunity, but I would like to know more about what the intentions are to the existing properties on the estate, I am aware only 4 are owned (of which we are one) that sit on the land within the plans and the rest are an asset and owned by Lord Derby.

I am already extremely worried that my family will end up living in the midst of an industrial estate, having seen examples of the councils strategy within the village of knowsley.

This is an expression of our concern.

Please advise if you have any information pertaining to this property within the plans.

Yours sincerely  
Emma Turton



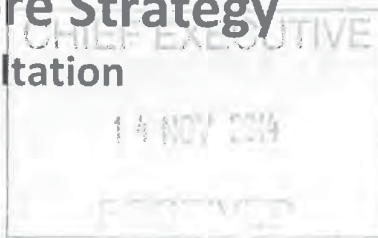


Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



**RETURNING THIS FORM**

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

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- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

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

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

**PART A – PERSONAL DETAILS**

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

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation FRANES PARBY

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

Modification Ref AD51 Policy Ref HGBS14 Paragraph Ref   
*land south of 62*

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

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

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

OBJECTION  
NOT POSITIVELY PREPARED  
Supposedly based on assessed needs of the area.  
But councillors admitted they do not really know  
how many houses will be build. Nor where  
the people will come from to fill the houses.  
Not looked at how it will affect surrounding  
areas e.g traffic, schools, doctors, hospital etc  
NOT JUSTIFIED  
Local communities not sufficiently targeted.  
Many people still have no idea it is going on.  
Many information brochures were not received  
by house holds - Jonathan Clark aware of this.  
People can't object if they don't know about it

*Continue on a separate sheet if necessary...*

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

Use brown land first then think of greenbelt land when there is no alternative

*Continue on a separate sheet if necessary...*

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

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

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

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

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

Signature



Date

12/11/14

## FRANCES PARRY

Not justified could.

- o Use of greenbelt not the most appropriate strategy as there are enough brown field sites in the area. These should be used first before green belt is considered.
- o social environment will be changed dramatically by changes. (Schools, doctors) economic environment - very few jobs in the area and not enough planned to stop people moving in without jobs.  
Resources - very few available to people already in the area. Schools, doctors are full. Hospital will struggle with influx of people. Transport not up to influx. Road system bad.

## NOT EFFECTIVE

- o Not enough planning gone into what will be put in place for infrastructure of the area. Very little detail available.
- o Councillors not aware of who or what is involved in the building of houses or amenities. No body seems aware of time scale. No one named to overlook it
- o The plan is the main reason why there will be major changes in the area and as such will generate more changes and needs. No formal review planned

## FRANCES PARRY

Not consistent with national policy

- o Green belt should only be used in exceptional circumstances when all brown land has been utilised.  
Lisa Harris (Councillor) says there is enough brown land available.
- o Developers are deciding what is to be built - not councillors e.g. how many houses 30-40 per hectare?  
150's?
- o Community misled on numbers.  
Councillors said 1503 but later admitted they don't know how many as developers will decide.  
Nos are seen now as guidance.
- o Plan undermining local democracy.  
First plan - using brown land - put forward rejected by government minister - Councillors told to plan for green belt. Most councillors are against this plan as are both MPs for the area.



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council

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

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	GARY DAVIS	
Job Title (if appropriate)		
Organisation (if appropriate)	WHISTON GREEN BELT ACTION GROUP	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

WHISTON GREENBELT ACTION GROUP

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

Modification Ref

M055 to  
M065

Policy Ref

CS1, to CS5,  
SUE AD51

Paragraph Ref

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

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

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

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

See attached sheets

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

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

Carry out a relevant Traffic Management survey, taking into account the existing loads at peak times and the additional loads placed upon the area with an influx of at least 2200 vehicles.

Insist that empty properties and brown field sites are developed before considering Green Belt release.

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

See attached sheets

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

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

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

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Signature



Date 3-11-2014



The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion,. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states "Planners must protect our Green Belt"

see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case. I note that under 'Housing land requirements and legal duties' the words from Government, in relation to maintaining a 5 year housing supply are 'advise' and 'should' (not 'instruct' or 'must'. The Council should ensure that brown field sites are prioritised, before any Green Belt release is considered.

I note that the numbers of dwellings to be built, and which subsequently make up the five year targets are set locally, by Knowsley Council (not the Government).

Knowsley say that the figure of 8100 new dwellings over the plan period (an ambitious figure, that is the real cause of all the problems) has been partly informed by household projections. Household projections for Knowsley between 2008 and 2028 (a time period greater than the plan period, but still with the same end date) gives a projected increase of 7000 dwellings. Knowsley state that this figure may be revised downwards, when new household projections are released by the Office for National Statistics. This is highly likely, given the revising downwards of the population forecasts for Knowsley, earlier this year. The Plan does then use the latest data.

The latest SHLAA (2012) identifies enough land in the urban areas of Knowsley for 5636 dwellings. Knowsley have adopted a cautious approach, with the identified sites, and the actual potential figure is a lot higher. A lot of these sites , whilst potentially able to accommodate housing are classed as 'undeliverable' within the 5 year supply period (due to various potential constraints, or timing issues). That is what the developers were able to persuade the Inspector of, during the public inquiry. However, by allowing building on Green Belt sites, it becomes less likely that the brownfield sites, in the existing urban areas, will be developed. There really does need to be a 'brownfield first' policy adopted by the Government.

In addition to the above, at April 2012 (latest figures available), Knowsley had 2020 homes registered as being empty. Bearing in mind that the 5636 figure from the potential housing supply could potentially be a lot higher,  $5636 + 2020 = 7656$ . Therefore at least 7656 potential dwellings are available, before any Green Belt release should be considered.

Also, Before any windfall sites (sites not considered as housing sites, but which subsequently become available), and there have been a lot of these in the past, are taken into consideration, and before the 'duty to co-operate' (where nearby local authorities such as Liverpool, with large areas of vacant and derelict land can potentially accommodate any unmet demand) is considered, I would reason that exceptional circumstances do not exist to warrant altering the Green Belt boundaries, in order to remove land from it.

Knowsley Council are making assumptions about housing targets, and planning for figures higher than those forecast by the Office for National Statistics. I believe that this 'predict and provide' approach, which is based upon an ambition, as opposed to an actual need, does not constitute exceptional circumstances I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton.

Is Not consistent with National Policy



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mrs	
Name	Gemma Carter	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	██████████ ██████████	
Postcode	██████████	
Telephone Number	██████████	
Email Address	██	
Preferred Method of Contact	██████	

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

I do not believe that the proposed removal of greenbelt is sound, nor do I believe that the proposal put forth to create 87 dwellings and green space is sound.

The area proposed by to be removed by the council and the developers has previously been used as sports fields and entertainment by the local community. This land was then bought by speculative developers and has been prevented from being used by the local community.

The proposal to remove this as greenbelt land would see an increase in the local traffic and impact the quality of life by the residents. Furthermore I do not believe that there is adequate resources open in the area.

St Pascal Baylon school is currently an oversubscribed school. With the introduction of 87 dwellings – many with children, this would impact the school heavily. Children who could go to this as their local school may well end up being pushed out further afield. Furthermore this is not a Knowsley Council school – but a Liverpool one.

The school creates significant traffic along Edenhurst Avenue and Gladstone Avenue during school times, to the degree that this is often dangerous as parent's park without due care and attention. The creation of additional houses will increase this problem.

The additional houses will also create extra pressure in the surrounding area on resources.

The local doctors, whilst currently accepting some new patients will be stretched on its current resources. It is currently impossible to get an appointment within the current guidelines due to this being an oversubscribed practice.

Furthermore the increased traffic will create significant problems to the local community. During the proposed building this will lead to heavy industrial traffic on residential roads, and will lead to significant disruption to the residents during this build period. Our right to family life will therefore be impacted greatly.

The proposal to have open green space on the edge of the site, is neither required nor needed. There are significant open green spaces, both at Court Hey Park and on Childwall Valley Road. This creation of open green space which will lead on to the Belle Vale estate will cause significant anti-social behaviour and will be used as a cut through for people not residing in the current area. This will not only lead to anti-social behaviour but will cause significant impact on police resources and create an unsafe environment for those of us who reside in the area.

The proposal has not taken into account local resident concerns and therefore cannot be considered as justified or sound as we have been excluded from the proposed developments until today.

The proposal to build 87 dwellings would impact on the local housing stock. These will stick out like a sore thumb. If this proposal is approved these should be built in a similar style to existing properties so not to deter the local area. Furthermore residents should be compensated as our house prices will be affected and potentially see a decrease in value.

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

I object to the proposal as this is not justified. Should this be approved, I believe that the removal of green space will damage the local houses and the feel of the estate.

The additional opening of un-required green space will create increased anti-social behaviour and will result to increased crime. I would propose that should the houses be built that the area identified as a flood zone is not opened up so to prevent increased crime and antisocial behaviour.

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

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

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

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

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**Signature**

Gemma Carter

**Date** 12/11/2014



HOUSE OF COMMONS

Local Plan Team  
Knowsley MBC  
1<sup>st</sup> Floor Annexe  
Municipal Buildings  
Archway Road  
Liverpool L36 9YU

14 November 2014

To whom it may concern:

I held a meeting with residents who had contacted me about the proposed Local Development Plan, specifically in regard to those proposals relating to the greenbelt within the Knowsley constituency.

Below are two separate but related sets of objections which were raised with me: first, I will set out objections to the consultation process and; secondly, planning objections. Some residents handed me documents at the meeting which they wish to be considered and I have scanned them and forwarded them to you in separate emails.

- 1 The consultation process:  
Dr John Sills, in his submission to the Local Plan Team dated 9th November 2014, covered the issue of the consultation process in detail. Point 1 of his communication makes the point that both the scope and scale of the written notice of the consultation was not adequate and that the council should '...consider re-convening the consultation process to take note of the views of local residents...'  
Another resident from Knowsley Lane who was legally entitled to be consulted in writing insists that she was not consulted. I have advised her to formally complain to the Ombudsman and have undertaken to take up her complaint on her behalf when she contacts me with her details. Dr Sills makes a similar complaint and I would be happy to also refer his complaint to the Ombudsman should he so wish.
- 2 Planning objections:
  - a) The character of Knowsley Lane and Knowsley Village:  
Residents expressed the view, strongly held, that the proposals would, inevitably, transform the character of the area which, at present, is semi-rural and, in some parts, very rural and quite remote.
  - b) Traffic volume:  
The view was expressed that the current volume of traffic, particularly that using Knowsley Lane, is already heavy. Two residents have undertaken their own traffic survey but the council should carry out an official traffic survey to assess the impact the proposal would have on the volume of traffic. This should apply to all sites under consideration.

c) The amenity of the area:

The loss of amenity the proposals represent in terms of open space for play and recreation purposes was highlighted.

d) Environmental Impact:

Residents expressed great concern about the environmental impact the proposals would have across all the greenbelt areas under consideration. A detailed environmental impact assessment is required for all sites under consideration to assess the potential effects on the wellbeing of residents, environmental pollution, flooding (which is already a periodical problem in Knowsley Village) and established wildlife habitats.

e) Housing Demand:

Residents questioned the need for the volume of new housing proposed for the sites under consideration. They felt that there is a lack of clarity about how the demand for additional housing has been evaluated and the demographic basis on which such calculations are based.

f) Greenbelt Prescott:

Dr Sills points out in his letter that when the sites concerned were incorporated into the greenbelt in the early 1980s, in response to a proposal to develop an office buildings, there was an implicit assumption that it would form a buffer against continuous development. It is argued that this need is still relevant.

g) Prescott Conservation Area:

Residents felt that the proposals would undermine the conservation area and would not be in keeping with the historic nature of the town.

h) Water main:

Building over the water main from Prescott reservoir would render it difficult to gain access to repair and deal with leaks and there has been a history of such leaks.

i) Knowsley's Green Borough Policy:

Some residents asserted that the proposals were in conflict with the Council's overall claim to be a 'green borough.'

Yours sincerely,

A large black rectangular redaction box covering the signature of Rt Hon George Howarth MP.

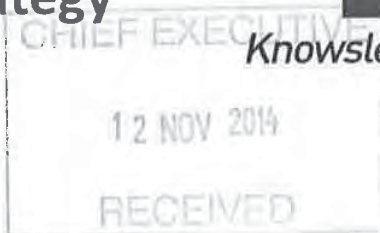
Rt Hon George Howarth MP.





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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

#### PART A – PERSONAL DETAILS

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

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

GEORGE ROWE

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

Modification Ref

MOSS  
NO 65

Policy Ref

CS1 TO CS5  
SUE ADS1 32

Paragraph Ref

3.20 3.21  
3.23 3.24  
3.26 4.10

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

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

THE LOCAL PLAN UNSOUND DUE TO THE FAILURE OF THE COUNCIL TO CARRY OUT ADEQUATE CONSULTATION WITH THE PUBLIC, SOME RESIDENTS HAVE ONLY JUST FOUND OUT ABOUT THE PLANS. I WOULD MAINTAIN THAT THE POLICIES OUTLINED IN THE CS1 TO 5 ADS1 AND THE SUE DOCUMENTS ARE OUT OF STEP WITH PUBLIC OPINION. I WOULD ASK THAT THE PUBLIC MEETINGS WITH INSPECTORS BE RECOMMEND TO TAKE INTO ACCOUNT THE VIEWS OF THE LOCAL RESIDENTS AND STATED BY THE GOVERNMENT IN THE LOCALISM BILL. I COUNCIL HAVE NOT UTILISED EMPTY PROPERTIES AND BROWN FIELD SITES IN ITS CALCULATIONS OF HOUSING NEEDS. THE COUNCIL HAVE NOT CONSIDERED INFRASTRUCTURE IMPROVEMENTS TO COPE WITH THE INFLUX OF PEOPLE.

Continue on a separate sheet if necessary...

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

TAKE INTO ACCOUNT GUIDANCE FROM ERIC  
PICKLES M.P. OCT 16 - 2014  
TAKE INTO ACCOUNT QNS POPULATION FIGURES  
FOR 2014 . . .  
RECONVENE PUBLIC INSPECTION  
CARRY OUT UPTO DATE TRASPOT  
SURVEY.

*Continue on a separate sheet if necessary...*

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

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

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

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Signature



Date

1. 11. 14



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



*Knowsley Council*

**RETURNING THIS FORM**

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

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

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MR.	Solicitor
Name	GERARD DOLAN	Middleton Solicitors
Job Title (if appropriate)	DIRECTOR.	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

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

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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

- It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.
- The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KBGS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Dear Sir

we do not want any more  
of the Green belt taken up. you will  
ruin a lovely village.

*Continue on a separate sheet if necessary...*

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

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Signature.....  .....

Date.....12.....November 2014



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

Knowsley Council



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**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mrs	Solicitor
Name	Eillian Smith	Middleton Solicitors
Job Title (if appropriate)	House wife	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

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All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Would like Knowsley Village to stay a small village and not a housing estate.  
Keep it in the Green Belt. We don't want to lose conservation + wild life.

*Continue on a separate sheet if necessary...*

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

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

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

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

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Signature...  ...

Date... 12<sup>th</sup> ..... November 2014



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR (RESIDENT)	
Name	GRAHAM GOFTON	
Job Title (if appropriate)	✓	
Organisation (if appropriate)	Roby Action Group	
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	[REDACTED]	

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

Roby Action Group

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

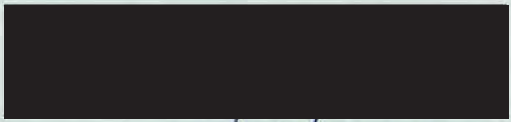
Environment – Development will disconnect 'Green Belt' between Bowring Golf Course/Farmland with Coast Hey park thus displacing songbirds, Fox, Badger etc and the natural order. I endorse CEO Ms. Ramsey statement of intent on Green Open Space 2014. Development will ruin Bowring Park forever as a unique and peaceful area to live. The area has been surrounded by Green Belt for 80 years as a residential area and Development would cause chaos and remove the ambient area from its uniqueness with hundreds of more cars and people.

Consultation – Real Consultation does not exist and at the last B.P.R.A. meeting Nov 2012 I asked when a Public meeting would be and Knowsley Planning officer suggested a large venue i.e. Heyton Suite.

*Continue on a separate sheet if necessary...*

PART B.3 continued. (G. GOFTON)

A proper public meeting has never happened either in B/Park or apparently or at any of the other six sites listed. Bowring residents Association seems to have been hijacked by Labour councillors and supporters to use it as a vehicle to carry its policy on housing development - quite a charade. It is no surprise or coincidence that the last B.R.A. meeting was in the Bowring Park Hotel in November 2012 - Job Done. Also, general knowledge of meetings regarding Housing Development and even recent 'Drop in Meetings' were not circulated with large swathes of the area nor the wiser.

  
11/11/2014

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

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Signature



Date

11/11/2014



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### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	ANDREWS	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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THIS AREA WOULD NOT BE A VILLAGE  
IF THIS GOES THROUGH  
BUT SAYING THAT WE MIGHT GET A  
BETTER BUS SERVICE, AND OTHER THINGS  
THIS VILLAGE MISSES OUT ON LIKE  
ROADS & PAVEMENTS GETTING RESURFACED.

Continue on a separate sheet if necessary...

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Signature.  .....

Date 13 - ..... November 2014



Knowsley Council

# Knowsley Local Plan: Core Strategy

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	Personal Details*	Agents Details*
Title	MR	Solicitor
Name	HARRY DONO	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
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b) Sound? (see guidance note 2.3)



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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Governing Councils are given legal parameters as to what proposals/actions/policies they are able to suggest/consult with people living within the borough they cover. The notice given by Knowsley Council with the restrictive time parameters does not intend to give the people of Knowsley Village sufficient time to express their concerns/have consultations or even offer alternative solutions. Do we not live in a democracy. Knowsley Village by nature of the name is a village and does not wish to be another housing estate. Residential developments are available throughout the Merseyside area. The green belt around Knowsley Village is used by dog walkers, horse riders, walkers elderly and young. The impact of your proposals would be negative on residents.

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature

[Redacted Signature]

Date... 11<sup>th</sup> November 2014



Knowsley Council

# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



## RETURNING THIS FORM

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

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

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

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	<i>mrs</i>	Solicitor
Name	<i>J MCCORMACK</i>	Middleton Solicitors
Job Title (if appropriate)	<i>Retired</i>	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Our Village is a lovely place to live, and will be spoiled, lots of Greenery why would you ruin it, by building more houses, we don't need or want them its a Village, and want it to stay that way, Please leave Knowsley Village alone, you must be aware that we don't have a lot of trouble here its a quiet place and we want it to stay that way. Trust us it will never be the same

*Continue on a separate sheet if necessary...*

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

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

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

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

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

Signature  .....

Date... 13<sup>th</sup> ..... November 2014



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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

**PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mr	Solicitor
Name	Ian	Middletons
Job Title (if appropriate)	McKenzie	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

Ian McKenzie and Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

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

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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CS5**

The proposal to remove large parcels of land from the Green Belt to the east and south of Knowsley Village came to the attention of the community just over one month ago. On 9 October 2014 over 400 local people [along with local councillors and the local MP, Mr George Howarth] met to hear the detail of the proposed action to remove more than 58ha of Green Belt around the village. There was a feeling of outrage at the meeting that at this stage in the process such large parcels of land could be taken from the Green Belt. Moreover, the community felt marginalised in the planning process which it is understood may not involve any further hearing of the representations that will be made. If that is correct it flies in the face of the statements that the plan process should be inclusive and that the voice of the local people should be heard. We trust that Mr.Pike will understand those deep concerns. We further hope that Mr.Pike will also understand that it takes time for a community to set out its case having regard to the need to seek professional help and to get to grips with the voluminous documentation that underlines the draft Core Strategy. Accordingly, we invite Mr.Pike in the interests of fairness, to arrange a hearing of the representations against the proposal to remove around 150 acres from the Green Belt at Knowsley Village. Should Mr.Pike agree to hold a hearing we should be grateful to receive a timetable for the process including submission of evidence.

The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CS5 and SUE1 and Appendix E of

the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need and supply in particular it is inherently difficult to predict the level of need 14 years ahead – it can be no more than speculative. Exceptional circumstances have not been demonstrated now to justify the release of Green Belt land at Knowsley Village.

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether Liverpool can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

It is unclear whether Knowsley Borough Council has considered whether there are at Green Belt sites in adjacent areas [whether in Liverpool, Sefton, Huyton or St Helens districts] that are less sensitive than the land at Knowsley Village. There is ample time to make such investigations before any possible need to release an equivalent area to that at Knowsley Village arises. Moreover, it appears that St. Helens Borough Council envisages the release of Green Belt in the mid 2020s so that their plan strategy could be coordinated with that of Knowsley Borough Council to address such need as may arise having regard to the predicted population changes by the O.N.S, the demand for both housing and employment land as well as potential additional housing land that may arise at for example the land east of Halewood or the land south of Whiston and south of the M62.

The proposal to develop more than 58 ha of Green Belt land [which is not well contained] at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 – document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and has only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy]. Reference will be made to paragraph 84 on the NPPF in this regard.

There is a further limb to the sustainability part of the argument. It is this – because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 30/ha on other sites. The result is that the proposal is land hungry [or least 17% more land hungry and perhaps substantially more] than other sites. Moreover, seeking to construct 1093 homes on the site appears ambitious, Lord Derby has questioned whether 1093 dwellings could be satisfactorily accommodated on site. If he is correct, and we think that he is then the overall density will fall below 25/ha. It is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Part of site KGBS 6 lies east of Ormskirk Road [some 21.58 ha in extent]. This land is in active agricultural youth and is rural in appearance. The eastern edge of the site is bounded by a substantial sandstone wall and a belt of trees on its other side. At the southern end of the site on the western side of Ormskirk Road is a woodland. Elsewhere on the western side of Ormskirk Road are substantive houses that look across the site. Overall there is a very clear division between Knowsley Village and the wider countryside set by Ormskirk Road. This area provides a quiet green lung [in contrast to the area west of Knowsley Village where the environment is dominated by the noise from the M57]. There is an attractive walk from the Conservation Area [in part it is on the Council's Heritage Walk] from Sugar Lane eastwards to Ormskirk Road and hence along Old Mill Lane [a cul de sac] which leads to a public footpath [which is signed] back to Ormskirk Road. Were the site to be developed this green lung would go. The community would be left with a walk through a very large suburban estate. The rurality of the area would be lost as would the impression of Lord Derby's Estate seen through the hedgerow along Ormskirk Lane. The bulk of the remainder of site KGBS 6 fronts the relatively busy Knowsley Lane [the B5202]. There is no natural screening of this part of the site from Knowsley Lane save for the hedgerow. The effect of the proposal will therefore be to bolt onto Knowsley Village a large housing estate. The interest and special qualities of the village will be further diminished and in a location where it is most frequently seen. Furthermore the development of the entirety of KGBS 6 will as the Council have recognised, have a major impact on air quality and sustainability.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is highly valued by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. The effect is that a sustainable urban extension would not be created. It is as the Council seem to appreciate very much a second choice because of the environmental sensitivity of the location and its poor access to key services [referred to by the Council as major negatives]. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

*Continue on a separate sheet if necessary...*

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

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

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

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

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

Signature



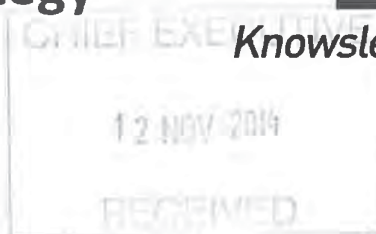
Date/4 November 2014





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Irene Davis	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

M0168

Policy Ref

SUE1 ,  
SUE2C

Paragraph Ref

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

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

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CS1 to 5, AD51 and the SUE1 & 2c documents are out of step with Public opinion,. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill. I consider the council have not utilised empty properties and brown field sites in its calculations of housing needs. The council have not considered infrastructure improvements to cope with the influx of people.

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

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

Carry out a relevant Traffic Management survey, taking into account the existing loads at peak times and the additional loads placed upon the area with an influx of at least 2200 vehicles.

Insist that empty properties and brown field sites are developed before considering Green Belt release.

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

Re-convene the public hearing due to the poor performance of the Council in letting the public know.

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

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

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

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Signature

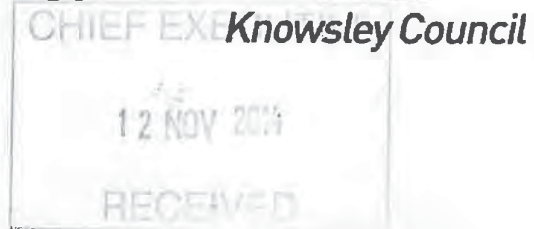


Date 30/10/2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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

### PART A – PERSONAL DETAILS

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

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

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**- YOUR REPRESENTATIONS**

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

Name and/or Organisation

IRENE R. MIER

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

Modification Ref

Policy Ref

KGB 5 14

Paragraph Ref

E 5

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

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

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

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

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

Need more notice of what's going on.

Continue on a separate sheet if necessary...

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

I object to these houses being built as it is bad enough trying to get out of my drive at school times, the congestion on the roads is awful, the pollution in the air will increase therefore chest complaints increase, resulting in G.P. appointments will be needed and my take longer to see your G.P.  
Where are the jobs, there is not any jobs in this area as it is. There used to be houses etc, now there are none. The strain on the H<sub>2</sub>O supply

Continue on a separate sheet if necessary...

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

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Signature



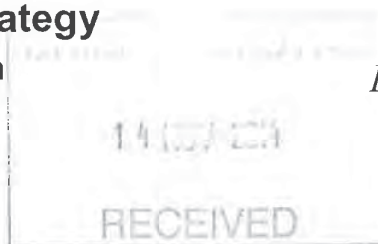
Date 1-11-14.



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

Knowsley Council



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### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MISS	Solicitor
Name	J.A. BARTON	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

Save Knowsley Village Green Belt Group

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Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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Yes No

a) Legally Compliant (see guidance note 2.2)



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a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative



Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I AM OBJECTING TO THE REMOVAL OF GREEN BELT LAND INTO 'SAFEGUARDED' LAND AS I CONSIDER A MISNOMER. SAFEGUARDED LAND IS ALMOST IMMEDIATELY AVAILABLE TO PLANNERS. THIS AREA HAS COLONIES OF BATS - PROTECTED SPECIES, MOLES SHREWS HEDGEHOGS AND OWLS - ENDANGERED SPECIES PLUS FOXES RABBITS. RATS AND MICE TOGETHER WITH A MYRIAD OF BIRD AND INSECT LIFE. EACH INTERDEPENDANT TO EACH OTHER CREATING A BALANCED ECOLOGY. I THINK IT IS OUR DUTY TO SUSTAIN THE STATUS QUO FOR FUTURE GENERATIONS. Continue on a separate sheet if necessary...

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

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

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Signature..



Date... 11.11.2014 November 2014

## CORE STRATEGY PLAN.

WHAT ARE YOUR PLANS FOR THE  
COLLECTION, RELOCATION OR  
CONSERVATION FOR THESE SPECIES

ALTHOUGH I AGREE PEOPLE  
HAVE A RIGHT TO OWN THEIR HOMES  
THE 'RIGHT TO BUY' ACT FOR COUNCIL  
TENANTS DECIMATED THE SOCIAL  
HOUSING SCHEMES IN THIS COUNTRY  
YOU REAP WHAT YOU SOW.

IT IS IRONIC, THEREFORE, THAT  
THE GOVERNMENT IS NOW PLANNING  
TO TAKE GREEN BELT LAND.

UNTIL SUCH TIMES AS BROWN FIELDS  
EMPTY HOUSES AND FACTORIES AND OFFICES  
ARE UTILISED FOR HOUSING. !

AM STRONGLY AGAINST THIS PLAN.

# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

CHIEF EXECUTIVE

14 NOV 2014

RECEIVED

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

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	Solicitor
Name	J.A.IRELAND	Middleton Solicitors
Job Title (if appropriate)	RETIRED A.D.I.	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

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Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

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All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

THE TWO SCHOOLS IN THE VILLAGE ARE TOO SMALL, TO ACCEPT A VAST INCREASE IN PUPILS. THE DOCTORS AS WELL HAS ONE DOCTOR, AND WE WOULD HAVE TO HAVE MORE OR WE WOULD HAVE TO WAIT WEEKS FOR A APPOINTMENT. AND NEW DEVELOPMENT WOULD TAKE AWAY THE CHARACTER OF THE AREA AND TURN IT INTO AN ESTATE AS SEEN IN THE COUNTRY. WE ALREADY HAVE ENOUGH MAIN ROAD GOING DOWN KNOWSLEY HAVE A NEW HOUSING ESTATE WOULD MAKE IT WORSE. WE NOW HAVE A 20 M.P.H. SPEED LIMIT. WOULD NEW PEOPLE IN THE AREA CARE AS MUCH AS THE ESTABLISHED RESIDENTS DO AND KEEP THE VILLAGE SAFE FOR ~~PEDESTRIANS~~ PEDESTRIANS. ALSO THE MAIN SEWER SYSTEM USED CONNECTED TO THE NEW BUILDINGS WOULD NOT BE ABLE TO CURE AND WOULD OVERFLOW.

Continue on a separate sheet if necessary...

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Signature.



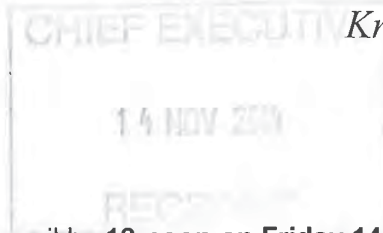
Date...11...11...November 2014

please complete will collect Wed/ Eve



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

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

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MISS	Solicitor
Name	J. CASSELLS	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

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Name and/or Organisation

Save Knowsley Village Green Belt Group

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

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Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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KNOWSLEY VILLAGE IS VER PRETTY  
DONT SPOL IT

*Continue on a separate sheet if necessary...*

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Signature..  .....

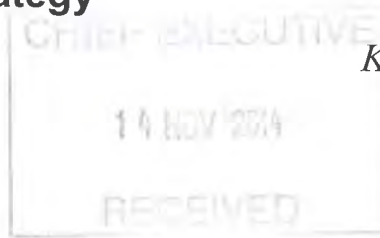
Date.....<sup>12</sup>.....November 2014



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Representations Form

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**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mico	Solicitor
Name	J.P. Cairns	Middleton Solicitors
Job Title (if appropriate)	Retired	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Accepted that some housing may well be necessary in the future, it would still be excessive to find over 1000 houses more, in the next ten years, unless landscaping and preservation of sizeable areas of land are guaranteed.

Continue on a separate sheet if necessary...

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

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

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Signature

Date.....13<sup>th</sup>.....November 2014



## Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

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

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	JACQUELINE JONES	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

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The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

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Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Its lovely to walk down that road and see the wild birds rabbits etc.

This is a village and should be kept as a village - and I don't think that something that has been greenbelt for over 50 years can just be taken away because of greed?

*Continue on a separate sheet if necessary...*

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

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

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

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

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Signature.  .....

Date.....11.....November 2014



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



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

**PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Ms	
Name	Jacqueline Lunt	
Job Title (if appropriate)	Senior practitioner	Health - child + Adolescent mental
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation Jacqueline Lunt

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

Modification Ref  Policy Ref KGBS14 Paragraph Ref ~~14~~  
E1

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

- |   | Yes                      | No   |
|---|--------------------------|--|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> ← maybe but                 |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> <u>NOT</u> sound |

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

E1. unsound because .....  
It is impossible to see how so many homes being built on our greenbelt will be helpful and in anyway positive for the environment and quality of life for the people of Whiston & the surrounding area.  
We will lose land that wildlife inhabits + there will be reduced habitat for insects and most importantly pollinating insects that are essential for future food production as well as the local ecosystem.  
Knewley is a highly deprived borough + has multiple ongoing public health issues. The increase in traffic during construction + after human inhabitation will result in poorer air quality for the people of Whiston, there is already far too much asthma in children + adult health problems.  
I use this area to walk in and this has been helpful to my physical + emotional wellbeing as I have grown up as a child and into adulthood.  
*Continue on a separate sheet if necessary...*

→ ctd

ctd.

EI ctd.

The proposals in this plan would greatly reduce the quality of life for people in Whiston. The quality of life would be impacted in a detrimental way, eg cars already back up at the lights in Whiston village past my house (No 38) resulting in me + my 11 week old son breathing air that is polluted with car fumes. This will only be worse with more residents living in the area. Car fumes cause health problems that impact on physical health. There will also be an increase in noise from these cars and this increases stress levels and is unhelpful to emotional wellbeing; this is especially pertinent to Knowsley residents as we have far too many health problems that need to be addressed and not made worse by more houses.

The woodland in Big Wood is many years old and as Knowsley residents this is our only possible access to established woodland. The woodland will be damaged and would not remain intact by the presence of so many new houses built in the area. This sort of woodland takes many decades to develop and can not be replaced and should not be morally put at risk in this way. The wood would become isolated oases amidst houses + impact on its capacity to be a home for wildlife and the movement of animals + insects. Please protect this area + do not build on this land, leave it alone.

EG. Environment I object to the release of this land as it is established greenfield with good soil quality that has taken many many decades to develop + evolve. The new plan will result in loss of this quality of greenbelt that the plan does not in any way replace or restore please leave this land alone.

## 55. Social reasons

I have lived my entire life in Whiston and now have my own son aged 11 weeks. I am greatly concerned that he will not have the recreational opportunities that I, and my generation have been able to enjoy. It is currently possible to walk to areas of greenbelt and enjoy the clean air, wildlife, peace + quiet. This area offers this as a goal for physical health via opportunities to exercise in the area and feel free and happy to walk + exercise. This is also extremely helpful in promoting mental + emotional wellbeing. I feel that this development will have a detrimental effect on the mental health + wellbeing of the people of Whiston and is therefore a potential significant blow to the quality of life for people in Whiston.

please do not go ahead with these plans.

please refer to consultation process I have not had sufficient consultation about this as a Whiston resident.

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

Release only brownfield.  
This is immoral + release of greenbelt is not  
acceptable...

This is not consistent with national policy + aims to  
protect public health.

*Continue on a separate sheet if necessary...*

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

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Signature



Date

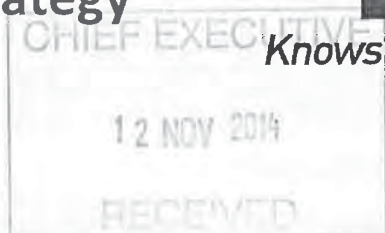
1.11.14





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JAMES O'BOURKE	
Job Title (if appropriate)	PRINTER	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

The development of Green Belt in Whiston will have a negative effect on the aim to mitigate climate change. The Sustainable and Low Carbon Development (S.183 S032-CS22) removal of the developers need to meet sustainable homes/ BREEAM standards will increase energy ~~usage~~. The increased traffic in the area will increase carbon emissions and have a detrimental effect on air quality. The Industrial Estate mentioned on Windy Arter Road has little effect on employment as the few factories that are occupied, have no need for more workers. There is also an acceptance that this development will not be suitable for energy generated by renewable sources. In addition, the removal of the requirement to achieve a certain Code for Sustainable Homes standards mean ~~that~~ there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health. "The need to build more sustainable housing with a limited supply of land means that innovation is necessary but working towards sustainable communities relies on more than the achievement of zero carbon housing; its success will also be determined by the selection of appropriate locations for development", Neil Williamson FRI, President Landscape Institute

Continue on a separate sheet if necessary...

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

There are plenty of 'brown field' sites that could  
~~be~~ be utilized first. Use empty properties.  
Keep us better informed.

*Continue on a separate sheet if necessary...*

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Signature



Date

01/11/14.



**Knowsley Local Plan: Core Strategy**

Proposed Modifications - Consultation  
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*Knowsley Council*

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**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mrs	Solicitor
Name	SARUELINE ROBINSON	Middleton Solicitors
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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These representations relate to policy SUE1 and the link changes in policies CS2 & CSS

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda. ✓

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village. WHICH BUILDING PROGRESS & CHANGES WILL

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National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative ✓

*RUIN THE BEAUTIFUL VILLAGES & ENTIRELY BURIED THE PRESENT LAND OWNER*

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF. ✓

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site. ✓

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard. ✓

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere. ✓

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt. ✓

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

*Continue on a separate sheet if necessary...*

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

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

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

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

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

Signature: [REDACTED] .....

Date: 11.11.14 November 2014

NOTE! MY WIFE'S WRITING IS POOR, BECAUSE OF HER SIGHT IMPAIRMENT. SHE HAS APPROX 20% OF NORMAL.



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE  
12 NOV 2014  
RECEIVED

Knowsley Council

### RETURNING THIS FORM

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

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

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

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JASON BROWN	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Greenbelt Action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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



## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

THE PLAN IS UNSOUND DUE TO THE COUNCIL'S FAILURE TO ADEQUATELY CONSULT WITH THE PUBLIC AS A LOT OF PEOPLE HAVE ONLY JUST HEARD ABOUT THE PLANS. I WOULD STATE THAT POLICIES OUTLINED IN CS1 TO 5, ADS1 AND SUE DOCS ARE OUT OF STEP WITH PUBLIC OPINION. I WOULD ASK THAT THE PUBLIC MEETINGS WITH THE INSPECTOR BE RE-CONVENED TO TAKE INTO ACCOUNT VIEWS OF LOCAL RESIDENTS AS STATED BY THE GOVERNMENT IN THE LOCALISM BILL. THE COUNCIL HAVE NOT UTILISED EMPTY PROPERTIES AND BROWN FIELD SITES INTO ACCOUNT ALSO THEY HAVE USED OUT OF DATE POPULATION FORECAST FIGURES. THEY HAVE NOT CONSIDERED THE TRAFFIC INFRASTRUCTURE

Continue on a separate sheet if necessary...

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

CARRY OUT AN UPTO DATE HOUSING REQUIREMENT TAKING INTO ACCOUNT LATEST FIGURES FROM ONS  
TAKE INTO ACCOUNT STATEMENT FROM ERIC PICKLES MP REGARDING THE RELEASE OF GREENBELT. THESE ARE NOT EXCEPTIONAL CIRCUMSTANCES.

*Continue on a separate sheet if necessary...*

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

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

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

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

Signature



Date 29/10/14

**From:** Jayne Tattan [REDACTED]  
**Sent:** 14 November 2014 10:43  
**To:** [REDACTED]  
**Subject:** Representation Form for M168 area  
**Attachments:** Change.Org signatures\_1415958185.txt; CS Mods Response Form and Guidance-2 JMTattan.pdf; Scan of Natural Approach to a thriving Borough.pdf; List of People in Attendance to a Thriving Borough Knowsley Green Space Conference June 14.pdf; Continuation sheet for CS Mode Response Form JMTattan.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Please find attached completed representation form, attached continuation sheet, [change.org](http://change.org) signatures from petition, New Green Space Strategy dated 19 June 14 and The Natural Approach to a Thriving Borough Knowsley Green Space Conference list of attendees and Companies represented.

Regards

**Jayne**

#### **Tattyhead Emails**

**The content in this email is Private & Confidential. If you have been sent this email in error, please notify the sender and delete from your files. Thank you.**

Name	City	State	Zip Code	Country	Signed On
Jayne Tattan					09/10/14
Jayne Tattan					09/10/14
Carla Jefferies					09/10/14
Chris Lovett					09/10/14
Colette McCormack					09/10/14
Zoe Alkiviadou					09/10/14
Tracie White					09/10/14
Chelsea Harris					09/10/14
Carly Fenn					09/10/14
chris wood					09/10/14
kristina Green					09/10/14
Jordan Spratt					09/10/14
Claire McDonald					09/10/14
Chris Whittle					09/10/14
david gaskell					09/10/14
Nicola Meredith					09/10/14
Andrea O'Shaughnessy					09/10/14
William O'Shaughnessy					09/10/14
Angels Mocroft					09/10/14
Jacqueline Barrow					09/10/14
Emma Shaw					09/10/14
Glen Turner					09/10/14
Kate Greene					09/10/14
chris rothery					09/10/14
Tom Crone					09/10/14
Ursula Rigert					09/10/14
phil newton					10/10/14
Jean Tattan					10/10/14
angela terry					11/10/14
Colin Spratt					11/10/14
Audrey Hastie					11/10/14
Elizabeth O'Halloran					12/10/14
johnny webster					13/10/14
Michael McLoughlin					14/10/14
Helen Flynn					14/10/14
Neil Cook					15/10/14
Stephen McDonald					15/10/14
Lisa Owen					16/10/14
Janet Nelsonjones					20/10/14
sandra bates					23/10/14
Gina Dearing					23/10/14
Jacqui Mcassey					23/10/14
Lorna Jackson					23/10/14
EDDIE GILDEA					23/10/14
Siobhan Brereton					23/10/14
Lee Kenny					23/10/14
Erika Mitchell					23/10/14
Janet Daly					23/10/14
Christine Howarth					23/10/14
nicola lyons					23/10/14
Vicki Hall					23/10/14
Karon Mageer					23/10/14

Joanne callister	[REDACTED]	23/10/14
Liam axworthy	[REDACTED]	23/10/14
Louise Tully	[REDACTED]	23/10/14
Nikki Penman	[REDACTED]	23/10/14
mary coulton	[REDACTED]	23/10/14
David Lowry	[REDACTED]	24/10/14
Samuel Cross	[REDACTED]	24/10/14
andrena jones	[REDACTED]	24/10/14
gaynor finney	[REDACTED]	25/10/14
sandra wilson	[REDACTED]	25/10/14
Donna Naden	[REDACTED]	27/10/14
Lee Goodwin	[REDACTED]	04/11/14

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



#### RETURNING THIS FORM

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

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

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

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Jayne Tattan	
Job Title (if appropriate)	Location Manager	
Organisation (if appropriate)	Lime Pictures Ltd	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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

## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

**M168**

Policy Ref

Paragraph Ref

Edenhurst Avenue Green Space Sportsfield Site

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

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

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

I OBJECT TO THE PROPOSED MODIFICATION OF THE EDENHURST AVENUE SPORTSFIELD SITE OF ENVIRONMENTAL IMPORTANCE LOCALLY. IT IS A FLOOD RISK SITE.

A PROPER INSPECTION OF THE SITE HAS NOT TAKEN PLACE. KNOWSLEY COUNCIL & LOCAL POLICE HAVE SPENT IN EXCESS OF £25,000 SECURING AND BLOCKING OFF A PUBLIC RIGHT OF WAY. LAND OWNED PRIVATELY AT A COST TO THE COUNCIL TAX PAYER.

WE ENDORSE K.M.B.C.'s U.D.P. OF 2008 ARGUMENTS FOR GREENBELT RETENTION AND FURTHER WELCOME THE SUPPORT OF CHIEF EXECUTIVE OFFICER SHEENA RAMSEY's - NEW GREEN SPACE STRATEGY CONFERENCE WHICH TOOK PLACE ON 19 JUNE 14 TITLED - "THE NATURAL APPROACH TO A THRIVING BOROUGH" IN SUPPORT OF OUR ARGUMENTS FOR GREEN AND OPEN SPACES AND REQUEST THIS PLEDGE IS HONOURED.

ATTACHED COPY OF THIS DOCUMENT AND A LIST OF COMPANIES AND PEOPLE IN ATTENDANCE AND SUPPORT OF THIS STRATEGY ON 19 JUNE 2014 AT THE NATIONAL WILDFLOWER CENTRE, COURT HEY PARK, ROBY ROAD, LIVERPOOL L16 3NA, WHICH BORDERS THE EDENHURST SPORTSFIELD SITE. THESE SITES ENHANCE EACH OTHER.

IN SUPPORT OF THIS STRATEGY AND IN ATTENDANCE AT THIS CONFERENCE PEOPLE FROM AREAS INCLUDING:- KNOWSLEY COUNCIL, MERSEY FOREST, ARUP, APSE, MEAS, LIVERPOOL JOHN MOORES UNIVERSITY, HALEWOOD VOLUNTEER GROUP, LEARNING THROUGH LANDSCAPES, MALVERN PRIMARY SCHOOL, ST HELENS COUNCIL, MERSEYSIDE BIOBANK, HERITAGE LOTTERY, ROYAL HORTICULTURAL SOCIETY, ABERDEEN CITY COUNCIL, MOUCHEL 2020 KNOWSLEY, INTELLIGENT HEALTH, NATIONAL WILDFLOWER CENTRE WILDLIFE, HALTON COUNCIL, KEEP BRITAIN TIDY, NORTHUMBRIA UNIVERSITY AMONGST OTHERS. ATTACHED COPY OF NAMES AND COMPANIES IN ATTENDANCE AT THIS CONFERENCE.

*Continue on a separate sheet if necessary*

PLEASE FIND ATTACHED A PETITION SIGNED IN SUPPORT OF THIS.

CONTINUED ON SEPARATE SHEET...

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

USE OF BROWNFIELD SITES MUST BE A PRIORITY.

SUCH ALTERNATIVES ARE:

THE OLD BOWRING PARK HIGH SCHOOL SITE. FORMERLY SITED AT WESTERN AVENUE, HUYTON L36. THIS SCHOOL HAS BEEN DEMOLISHED AND AS A FORMER BROWNFIELD SITE IS AN IDEAL ALTERNATIVE SITE.

ROBY COLLEGE, RUPERT ROAD, ROBY L36 9TD. A CURRENT BROWNFIELD SITE, THE COLLEGE IS DUE TO BE RELOCATED WITHIN KNOWSLEY AND THE BUILDING IS EARMARKED TO BE DEMOLISHED. THIS IS AN IDEAL ALTERNATIVE SITE.

TWO FIRE STATIONS IN THE KNOWSLEY BOROUGH HAVE BEEN EARMARKED FOR CLOSURE. AS BOTH ARE BROWNFIELD SITES AND SET TO BE DEMOLISHED HAVE BEEN IDENTIFIED AS IDEAL ALTERNATIVE SITES.

*Continue on a separate sheet if necessary*

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

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

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

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

Signature

J.M.Tattan

Date



# The natural approach to a thriving borough

Thursday 19 June 2014

The National Wildflower Centre  
Court Hey Park  
Huyton



Wesley

We are extremely fortunate to have a wealth of good quality parks and green open space across Knowsley. Every day Knowsley's residents and visitors have fun in our local play areas, stroll through our woodlands, play sports on our recreation grounds, participate in green space activities, grow produce in allotments or study our natural habitats.

Without green and open spaces, life for people living in our borough would be very different. As a Council we want everyone to be able to easily use and enjoy local clean, green and open spaces.

Good green spaces both protect us and provide for us. They can help us tackle health, educational and social inequalities and offer a unique contribution to the creation of vibrant, healthy and prosperous communities.

It is evident that quality green spaces can:

- Promote health and wellbeing
- Set the scene for economic growth
- Provide social value
- Improve educational attainment, motivation and behaviour
- Mitigate against and adapt to climate change
- Reduce crime and anti social behaviour
- Enhance natural assets and biodiversity

To maximise these many benefits we want to work collaboratively with local people, our communities and partners. From community actions to partnership projects, it is clear that the people of Knowsley and our partners will be central to delivering the ambitions of our new Green Space Strategy.

Sheena Ramsey,  
Chief Executive,  
Knowsley Council



Environmental Sustainability Service  
Knowsley Council  
Stretton Way  
Huyton  
Knowsley L36 6JF  
Tel 0151 443 3682



Knowsley Council

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## The Natural Approach to a Thriving Borough Knowsley Green Space Conference

Name		Title	Organisation
Matt	Ashton	Director of Public Health	Knowsley Council
Clare	Austin	Research Assistant	Merse Forest
Alison	Ball	Senior Associate	Arup
Lynda	Bamber	Children and Family Services Manager	Knowsley Council
Ian	Bancroft	Head of Social Growth	Knowsley Council
Mo	Baines	Principal Advisor Northern Region	APSE
Stuart	Barnes	Head of Planning	Knowsley Council
Christine	Bennett	Ecology Team Leader	MEAS
Denise	Best	Operations Manager (Street Scene)	Knowsley Council
Claire	Boardman	Merseyside Biobank	Liverpool John Moores University
Pam	Boffey	Volunteer	Halowood Volunteer Group
Paul	Boffey	Volunteer	Halowood Volunteer Group
Paul	Boyce	Director of People Services	Knowsley Council
Dawn	Boyer	Head of Corporate Services	Knowsley Council
Karen	Brady	Green Space Ranger	Knowsley Council
Dave	Burthoff	Director	Learning Through Landscapes
Rupert	Cesey	Head of Environmental Services	Knowsley Council
Adrian	Carlton	Principal Analyst	Knowsley Council
Sara	Crowes	Senior Development Officer (Merseyside)	Groundwork
Councillor Eddie	Connor	Cabinet Member for Leisure, Community & Culture	Knowsley Council
Councillor Neil	Cooney	Convener, Housing and Environment	Aberdeen City Council
Christine	Croft	Inclusion Manager	Malvern Primary School
Matt	Davies	Public Health	St Helens Council
Caroline	Davies	Public Open Spaces Manager	Knowsley Council
Dawn	Holmes	Green Space Ranger	Knowsley Council
Ben	Deed	Local Records Centre Officer	Merseyside Biobank
Phil	Denton	Green Space Development Officer	Knowsley Council
Derek	Dottie	Parks Manager	Liverpool Council
James	Duncan	Director of Finance and Information Technology	Knowsley Council
Jon	Dyson	Head of Waste and Street Scene Services	Knowsley Council
Catherine	Elvin	Grants Officer	Heritage Lottery
John	Flaherty (Chair)	Director of Neighbourhood Delivery	Knowsley Council
Doreen	Fennell	Hope Primary School	Hope Primary School
Paul	Gardner	Volunteer	Friends of Webster Park
Jane	Gowing	Nature Connected Board Member	Sefton Council
Bernie	Green	Director of Customer and Employee Services	Knowsley Council
Russell	Greenway	Volunteer	Friends of Webster Park
Anne	Gunning	Community Horticulture Manager	Royal Horticultural Society
Nigel	Hancock	Parks Development Officer	Kirklees Council
John	Handley	Emeritus Professor	University of Manchester
Mike	Harden	Deputy Chief Executive	Knowsley Council
Lisa	Harris	Director of Regeneration & Housing	Knowsley Council
Howard	Harris	Volunteer	Biobank
Claire	Hogart	Head of Policy & Partnerships	Knowsley Council
Richard	Holford	Head of Public Health, Strategy & Intelligence	Knowsley Council
Susan	Hulme	Teacher	Evelyn Primary School
Claire	Hunter	Change Manager, Environment	Aberdeen City Council
Kelly	Hum	Communications Officer	Knowsley Health Watch
Phil	Hurst	Green Space Development Officer	Knowsley Council
Ryan	James	Senior Planner	Knowsley Council
David	Jeffrey	Access and Engagement Lead Adviser	Natural England

Alan	Jemmet	Director	MEAS
Gordon	Jenkins	Chair and Trustee	National Wildflower Centre Landlife
Barbara	Johnstone	Early Years Quality Lead	Knowsley Council
Lisa	Jones	Director of Change and Transformation	Knowsley Council
Patience	Jones	Business Travel Advisor	Knowsley Chamber of Commerce
			Knowsley Community
			Voluntary Services
Racheal	Jones	Social Growth Programme Manager	National Wildflower Centre Landlife
Tony	Jones	Chief Executive	Knowsley Council
Steve	Jones	Parks & Cemeteries Manager	Biobank
Bob	Jude	Biobank Volunteer	Knowsley Council
Liz	Kelly	Schools and Educational Attainment Officer	Kirklees Council
Andrea	Lane	Planning Officer	National Wildflower Centre Landlife
Annick	Laroque	Great Outdoors	Knowsley Council
Gordon	Lavender	Green Space Ranger	Knowsley Council
Yvonne	Ledgeron	Head Of Democratic Services	Community Action Wirral
Karen	Livesey	Business Development Manager	Halewood Volunteer Group
Janel	Markey	Halewood Volunteer Group	Knowsley Council
Kirsty	Marin	Environment Officer	Halewood Volunteer Group
John	Mason	Halewood Volunteer Group	Knowsley Council
Fiona	Mather	Green Space Strategy Manager	Cycling Projects
Kevin	McCann	Pedal Away	Knowsley Council
Andrew	McCormick	Director of Community and Leisure	Knowsley Council
Dale	Milburn	Director of Business, Investment and Sustainability	Kirklees Council
Emma	Mile	Landscape Architect Manager Park and Landscapes	Merseyside Police
Sergeant	Mitchell		Delaware Allotments
Ian	Morris	Allotment Holder	Aberdeen City Council
Councillor Joan	Morrison MBE	Vice Convener, Housing and Environment	Knowsley Council
Julie	Moss	Director of Integrated Commissioning	Mouchel 2020 Knowsley
Tony	Muir	Director and Market Lead for Projects North West	Knowsley Council
Councillor			
Michael	Murphy	Cabinet Member for Health and Social Care	Knowsley Council
Jacqueline	Mutch	Programme Director Merseyside	Groundwork Lancashire
Natale	Naisbltt	Climate Change & Sustainability Manager	Knowsley Council
Clare	Olver	Project Development Officer	The Mersey Forest
Catherine	Oseman	Phase Leader for Early Years Foundation	Malvern Primary School
Julie Anne	Parker	CSR Coordinator (Environment)	First Ark
Carol	Peacey	Merseyside Fire and Rescue Service	Merseyside Fire and Rescue Service
Jan	Pell	Development and Marketing Manager	National Wildflower Centre Landlife
		Director of Operations, Knowsley Safari Park and Hall	
Edward	Perry	Landscape Architecture and Urban Design Team Leader	Knowsley Estate
Mike	Porter	Public Health Officer	Mouchel 2020 Knowsley
Susannah	Quinn	Chief Executive	Knowsley Council
Sheena	Ramsey	Green Space Ranger	Knowsley Council
Aaron	Reading	Head of Environment Services, Housing and Environment	Knowsley Council
Mark	Rully	Project Director	Aberdeen City Council
Veronica	Reynolds	Area Community Safety Manager	Intelligent Health
Kevin	Rigby	Education Change Partner	Knowsley Council
Alex	Roper	Director of Environmental Protection	Knowsley Council
Paul	Sanderson	Area Officer, Housing and Environment	St Helens Council
Sandy	Scott	Cabinet Member for Children and Family Services	Aberdeen City Council
Councillor Gary	Sec	Environment Manager, Housing and Environment	Knowsley Council
Steven	Shaw	Communications Manager	Aberdeen City Council
Cathy	Sheel	Green Space Development Officer	Knowsley Council
Cath	Sheil	Trustee	Knowsley Council
Tony	Siebenthaler	EYFS Lead Teacher Mentor	National Wildflower Centre Landlife
Jan	Smyth		Knowsley Council

Joanne	Sperry	Play Development Manager	Knowsley Council
Catherine	Taylor	Principal Health Promoting Environments Officer	Knowsley Council
Julie	Tierney	Head of Health Improvement	Knowsley Council
Paul	Todd	Green Flag Manager	Keep Britain Tidy
Kevin	Waiton	Senior Planning Enforcement Officer	Kirklees Council
Tim	Ward-Dutton	Open Spaces Manager	Halton Council
Kerry	Wutsby	Teacher	Evelyn Primary School
Darren	Wilson	Green Space Ranger	Knowsley Council
Helen	Williams	Public Health	St. Helens Council
Michelle	Woods	Student	Northumbria University
Councillor Graham	Wright		Knowsley Council
Paul	Wright	Open Spaces Services Divisional Manager	Halton Council

IT IS AN UNSUSTAINABLE LOCATION DUE TO THE NEAREST LOCAL SCHOOL BEING OVERSUBSCRIBED AND OUTSIDE THE BOROUGH. THE NEAREST PRIMARY SCHOOL WITHIN THE BOROUGH IS 1.7 MILES AND HAS NO PUBLIC TRANSPORT MEANS TO AND FROM IT. INCREASING THE CARBON FOOTPRINT IN THE AREA DUE TO THE **NEED** OF CAR(S)

HIGHWAY AND ACCESS CONSTRAINTS MAKE IT AN INAPPROPRIATE DEVELOPMENT.

THIS SITE IS ENCLOSED BETWEEN THE B5178, A MAIN THOROUGHFARE TO AND FROM LIVERPOOL FROM THE M57 AND THE START AND JUNCTION 5 OF THE M62. CONGESTION IN THESE AREAS IS DAILY AT ALL TIMES IN THE DAY. NOXIOUS FUMES AND PEOPLES HEALTH AND WELFARE WILL BE COMPROMISED.

A TREE PRESERVATION ORDER IS IN PLACE TO PROTECT THE POPLAR TREES ON THE SITE. ANY PROPOSED BUILDING WILL LIKELY CAUSE DAMAGE.

THE CONSULTATION HAS NOT BEEN LEGALLY COMPLIANT. THERE HAS BEEN NO PUBLIC MEETING OR FORUM AND APPROX. 80% OF RESIDENTS FROM BOTH KNOWSLEY AND LIVERPOOL (BOUNDARIES) REMAIN UNINFORMED.

[REDACTED]

---

**From:** Jayne Tattan [REDACTED]  
**Sent:** 14 November 2014 11:49  
**To:** [REDACTED]  
**Subject:** Fwd: Representation Form for M168 area  
**Attachments:** Change.Org signatures\_1415958185.txt; CS Mods Response Form and Guidance-2 JMTattan.pdf; Scan of Natural Approach to a thriving Borough.pdf; List of People in Attendance to a Thriving Borough Knowsley Green Space Conference June 14.pdf; Continuation sheet for CS Mode Response Form JMTattan.docx; Scan copy of Flood Area Edenhurst Site.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Please add this supporting document KGBS16: Edenhurst Avenue, Huyton. In respect of the problematic and flood risk site at Edenhurst.

Kind regards

**Jayne**

**Tattyhead Emails**

**The content in this email is Private & Confidential. If you have been sent this email in error, please notify the sender and delete from your files. Thank you.**



Part 8: KGBS19: East Halewood



Source: Knowsley Housing Position Statement (SD22)

Do not email reserve list forward

FLOODING

Knowsley Local Plan Core Strategy

Supplementary Information for Matter 3 - KMBC

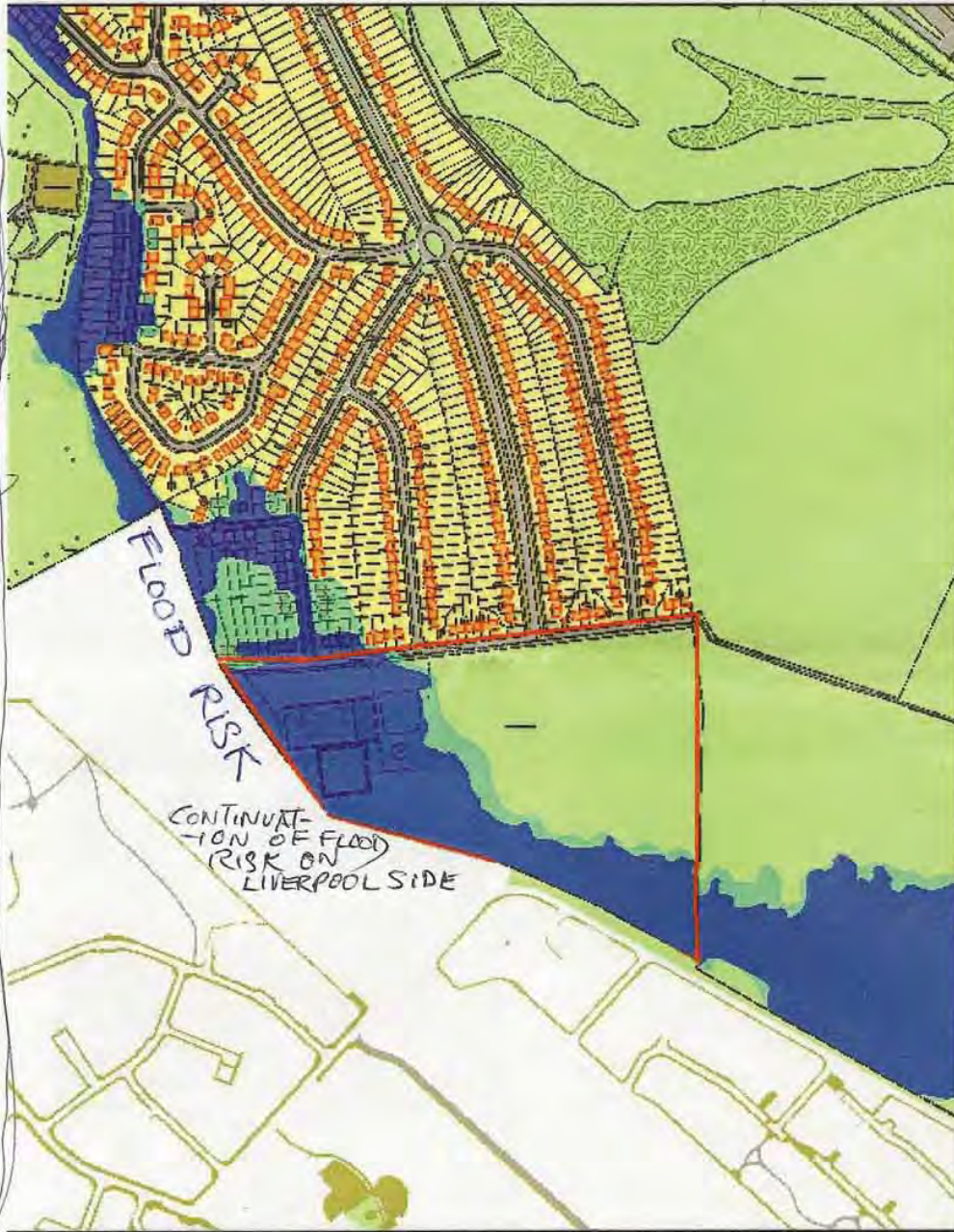
shephard ave

# SPORTSFIELD ANDESTATE

Part 7: KGBS16: Edenhurst Avenue, Huyton

## Reserve List & Resistance

anxiety for existent residents over 10 years



Port Meadow  
 Advising Council  
 Open to advise

Resist the pressure from developers  
 on smaller reserve sites.  
 Initial Referral.

5yr supply  
 3,443  
 2,700  
 7309  
 4,500  
 5,000

Enclosed Bowring Estate / limited areas  
**FLOOD RISK SITE DOCUMENT**  
 Source: Knowsley Housing Position Statement (SD22)

120 doubled 8 Acres

Statements of Intent

existent residents fears

Jan Lawson from Party  
 Wood Tony Jones Wildswan Lake

**From:** HOWARTH, George [REDACTED]  
**Sent:** 14 November 2014 11:17  
**To:** [REDACTED]  
**Subject:** FW: Representation Forms & Bowring Park Area

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**From:** Jayne Tattan [REDACTED]  
**Sent:** 14 November 2014 10:55  
**To:** HOWARTH, George  
**Subject:** Representation Forms & Bowring Park Area

Dear George,

Thank you for the offer to meet John Webster, Alan Shaw and Myself in respect of the proposed change to the Edenhurst Avenue Greenspace Sportsfield Site.

Sadly, I doubt this meeting will take place before today's noon deadline, however there are some points I would like to make in respect of our area and welcome setting a date for such a meeting.

Could you please add these to your Representation for our Area as you stated last night in the meeting.

I look forward to hearing from you.

Kind regards

Jayne

- IT IS AN UNSUSTAINABLE LOCATION DUE TO THE NEAREST LOCAL SCHOOL BEING OVERSUBSCRIBED AND OUTSIDE THE BOROUGH. THE NEAREST PRIMARY SCHOOL WITHIN THE BOROUGH IS 1.7 MILES AND HAS NO PUBLIC TRANSPORT MEANS TO AND FROM IT. INCREASING THE CARBON FOOTPRINT IN THE AREA DUE TO THE **NEED** OF CAR(S)
- HIGHWAY AND ACCESS CONSTRAINTS MAKE IT AN INAPPROPRIATE DEVELOPMENT. ANY CHANGE OF USE WILL CAUSE FURTHER CONGESTION IN AN AREA ALREADY PLAGUED WITH HIGHWAY AND ACCESS CONSTRAINTS.
- THERE IS NO SOUND INFRASTRUCTURE. THE NEAREST PRIMARY SCHOOL IS OUTSIDE THE BOROUGH AND ALREADY OVERSUBSCRIBED FROM CHILDREN WITHIN THE LIVERPOOL AREA.

- THIS SITE IS ENCLOSED BETWEEN THE B5178, A MAIN THOROUGHFARE TO AND FROM LIVERPOOL FROM THE M57 AND THE START AND JUNCTION 5 OF THE M62. CONGESTION IN THESE AREAS IS DAILY AT ALL TIMES IN THE DAY. NOXIOUS FUMES AND PEOPLES HEALTH AND WELFARE WILL BE COMPROMISED.
- A TREE PRESERVATION ORDER IS IN PLACE TO PROTECT THE POPLAR TREES ON THE SITE. ANY PROPOSED BUILDING WILL LIKELY CAUSE DAMAGE.
- THE CONSULTATION HAS NOT BEEN LEGALLY COMPLIANT. THERE HAS BEEN NO PUBLIC MEETING OR FORUM AND APPROX. 80% OF RESIDENTS FROM BOTH KNOWSLEY AND LIVERPOOL (BOUNDARIES) REMAIN UNINFORMED.
- THERE HAS BEEN NO PUBLIC MEETING OR FORUM, ONLY A DROP-IN EVENT WHICH PROVIDED SCANT INFORMATION. IGNORING 80% OF RESIDENTS WHO DIRECTLY AFFECTED, LEAVING THEM UNINFORMED ABOUT THE PROPOSED CHANGE OF USE.
- KNOWSLEY COUNCIL AND LOCAL POLICE HAVE SPENT BETWEEN £25,000 & £28,000 FENCING OFF THE AREA OF THE EDENHURST AVENUE GREEN SPACE SPORTS FIELD SITE, CUTTING OFF A PUBLIC RIGHT OF WAY.
- A SITE OWNED PRIVATELY AND ALWAYS ALLOWED ACCESS TO RESIDENTS AND WALKERS UNTIL THE COUNCIL SPENT COUNCIL MONEY SECURING AND BLOCKING RESIDENTS AND MEMBERS OF THE PUBLIC OUT.
- IT IS CLAIMED INSPECTIONS HAVE BEEN CARRIED OUT AT THIS, AND OTHER SITES, THROUGHOUT THE GREENBELT IN KNOWSELY, WHICH ARE PART OF THE CURRENT "PUBLIC CONSULTATION".
- THE SITE IS EXTREMELY SECURE, SO MUCH SO IT IS IMPOSSIBLE FOR IT TO BE INSPECTED. IT IS IMPOSSIBLE TO GAIN ACCESS TO THE SITE. THEREFORE, THE CLAIM OF ANY SUCH INSPECTION IS EXTREMELY FLAWED AND QUESTIONABLE.
- WE ENDORSE K.M.B.C.'s U.D.P. OF 2008 ARGUMENTS FOR GREENBELT RETENTION AND FURTHER WELCOME THE SUPPORT OF CHIEF EXECUTIVE OFFICER SHEENA RAMSEY'S - NEW GREEN SPACE STRATEGY CONFERENCE WHICH TOOK PLACE ON 19 JUNE 14 TITLED - "THE NATURAL APPROACH TO A THRIVING BOROUGH" IN SUPPORT OF

OUR ARGUMENTS FOR GREEN AND OPEN SPACES AND REQUEST THIS PLEDGE IS HONOURED.

- ATTACHED COPY OF THIS DOCUMENT AND A LIST OF COMPANIES AND PEOPLE IN ATTENDANCE AND SUPPORT OF THIS STRATEGY ON 19 JUNE 2014 AT THE NATIONAL WILDFLOWER CENTRE, COURT HEY PARK, ROBY ROAD, LIVERPOOL L16 3NA, WHICH BORDERS THE EDENHURST SPORTSFIELD SITE. THESE SITES ENHANCE EACH OTHER.

IN SUPPORT OF THIS STRATEGY AND IN ATTENDANCE AT THIS CONFERENCE PEOPLE FROM AREAS INCLUDING:-

KNOWSELY COUNCIL,

MERSEY FOREST,

ARUP,

APSE,

MEAS,

LIVERPOOL JOHN MOORES UNIVERSITY,

HALEWOOD VOLUNTEER GROUP,

LEARNING THROUGH LANDSCAPES,

MALVERN PRIMARY SCHOOL,

ST HELENS COUNCIL,

MERSEYSIDE BIOBANK,

HERITAGE LOTTERY,

ROYAL HORTICULTURAL SOCIETY,

ABERDEEN CITY COUNCIL,

MOUCHEL 2020 KNOWSLEY,

INTELLIGENT HEALTH,

NATIONAL WILDFLOWER CENTRE WILDLIFE,

HALTON COUNCIL,

KEEP BRITAIN TIDY,

- NORTHUMBRIA UNIVERSITY AMONGST OTHERS. ATTACHED COPY OF NAMES AND COMPANIES IN ATTENDANCE AT THIS CONFERENCE FOR YOUR PERUSAL.

Jayne

**Tattyhead Emails**

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Part 8: KGBS19: East Halewood



Source: Knowsley Housing Position Statement (SD22)

Do not enag reserve list forward

FLOODING

Knowsley Local Plan Core Strategy

Supplementary Information for Matter 3 - KMBC

shephard ave

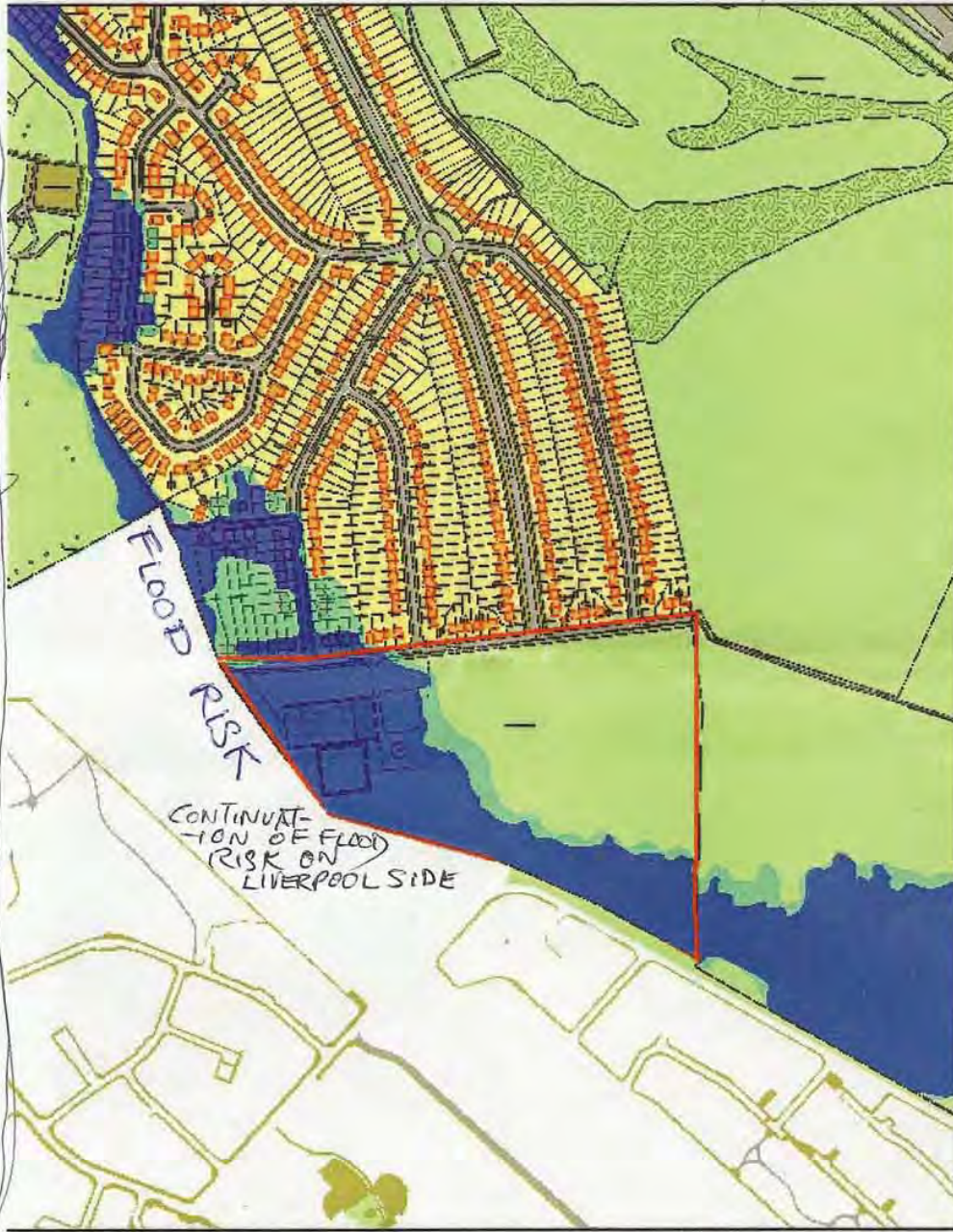
# SPORTSFIELD ANDESTATE

Part 7: KGBS16: Edenhurst Avenue, Huyton

## Reserve List & Resistance

anxiety for existent residents over 10 years

Port Meadow  
Advising Council  
Open to advise



Resist this pressure from developers on smaller reserve sites.  
Initial Refinement.

5yr supply  
3,443  
1,700  
3,309  
4,500  
5,500

Enclosed Bowring Estate / limited areas  
**FLOOD RISK SITE DOCUMENT**  
Source: Knowsley Housing Position Statement (SD22)

120 doubled 8 ACRES high density  
Statements of Intent

existent residents fears

Jan Lawson from  
Tom Jones  
Willowbank



To Local Plan Team  
Knowsley MBC  
1<sup>st</sup> Floor Annexe  
Municipal Buildings  
Archway Road  
Liverpool  
L36 9YU

CHIEF EXECUTIVE  
14 NOV 2011  
RECEIVED

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 November 2014 00:42  
**To:** Knowsley Local Plan  
**Cc:** [REDACTED]  
**Subject:** Knowsley Local Plan:Core Strategy Proposed Modifications - ConsultationRepresentations form  
**Attachments:** JenK13112014CSModsResponseFormGuidance2.docx; MBKLocalPlan.doc; To Local Plan Team.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Local Plan Team

I attach my completed form and referred submission of John Sills who has authorised me to inform you I wish to sign his form as attached , being a copy of his already submitted submission.  
Trust this is all useful

Jen Kokosalakis

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



#### RETURNING THIS FORM

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

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

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

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

#### **PART A – PERSONAL DETAILS**

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

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

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

## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

Jennifer Kokosalakis

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

Modification  
Ref

M078, M168 & M272

Policy Ref

CS5, SUE1, SUE2

Map extract 5 Land bounded  
by A58 Prescott

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

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

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

**3.** I consider this is **NOT LEGALLY COMPLIANT** because there has not been sufficient consultation. I only know of one, Dr John Sills,\* who had heard of the proposals. I have not until this Wednesday, been aware, or notified of any council consultation on this matter, The Knowsley Park Lane lamp post notice and letter which he received, never appeared in Park Road, even though this proposal is in my vicinity. I am shocked KMBC's good record of consultation has not applied to this action.

I consider this change from Green Belt to Sustainable Urban Extension (for residential use) **IS NOT SOUND**, being inappropriate for the western corner because due to the brook bridge it's perimeter consists of very much higher road levels and probably is the reason there is just one farm bungalow right in the centre of it, because other parts of the site would be oppressively low, lacking light and views, so I recommend the farm and its field be changed back to Green Belt. Green belt land should only be planned for development, if all full potential of brownfield sites has been allocated, of which there are many.

Visually and historically Prescott Town crowns the height of the sandstone ridge dramatically. The existing Green Belt wedge at the base (the Whitaker triangle /this proposed modification site) is significant in leading the view up to this pinnacle. Infill this with housing of any scale and the long established vista - visible from great distances - will be lost.

As with a number of these Core Strategy proposed modifications, this part of the defined site is traversed by a stream, (Prescot Brook), which by its presence, it is the lowest point in the surrounding topography and dwarfed by the A57 and wall above, which as well as this can be an unpleasant factor regarding light and outlook, as indicated by the farm bungalow being right in the middle. This has no other housing, for obvious historic reasons - to be safe from potential flooding - which if housing is built here with increased hard surfaces of houses, roads, parking and hard landscaping and increasing danger from climate change, would intensify flash flood danger. Even if culverting is employed across the whole site, there could still be a danger in future of backing up. If the housing is kept clear of the lowest flood endangered land, this would reduce the numbers of housing and maybe become non cost-effective.

But I agree with the modification to change the northern section from Green Belt to Urban Greenspace and educational land as long as this does not mean high rise school buildings overshadowing the adjacent housing.

\* whose submission I have now had sight of and wish to add my name to his list of **objectors regarding the whole of his submission.**

**you are objecting to the modification please set out how you consider it should be changed**

**to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

4. To make this LEGALLY COMPLIANT this modification to Sustainable Urban Extension (for residential use) should be subject to consultation with all residents of Prescott, the Historic Soc. and THI and potential developers should be consulted re the risk of flooding.

To make this modification to Sustainable Urban Extension (for residential use), SOUND it should be changed back to Green Belt or to Urban Greenspace.

Even if culverting is employed across the whole site, there could still be a danger in future of backing up.

If the housing is kept clear of the lowest flood endangered land, this would reduce the numbers of housing and maybe become non cost-effective.

I agree with the modification to change the northern section from Green Belt to Urban Greenspace and educational land as long as this does not mean high rise school buildings overshadowing the adjacent housing.

**PART B – YOUR REPRESENTATIONS**

**(This is a DUPLICATE of Part B as my comments relate to MORE than one modification)**

Name and/or Organisation

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

Modification Ref  Policy Ref

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

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

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

### **MAP EXTRACT 6 CARR LANE PRESCOT**

I consider this is **NOT LEGALLY COMPLIANT** because there has not been sufficient consultation. I only know of one, Dr John Sills, who had heard of the proposals. I have not until this Wednesday, been aware, or notified of any council consultation on this matter, The Knowsley Park Lane lamp post notice and letter which he received, never appeared in Park Road, even though this proposal is in my vicinity. I am shocked KMBC's good record of consultation has not applied to this action.

#### **Not sound**

As with a number of these Core Strategy proposed modifications – this site is traversed by stream and possibly farm ditches. Also by definition of the existence of the stream, it is the lowest point in the surrounding topography, which as well as this can be an unpleasant factor regarding light and outlook, these areas have no housing in the vicinity, for obvious historic reasons - to be safe from potential flooding - which if housing is built here with increased hard surfaces of houses, roads, parking and hard landscaping and increasing danger from climate change, would intensify flash flood danger.

Even if culverting is employed across the site, there could still be a danger in future of backing up.

If the housing is kept clear of the lowest flood endangered land, this would reduce the numbers of housing and maybe become non cost-effective.

Also Green belt land should only be planned for development, if all full potential of brownfield sites has been allocated, of which there are many.

The site is adjacent to South Prescott Planning Action Area and it would seem premature to consider housing here, until it is known what proposed activities are planned adjacent.

\* whose submission I have now had sight of and wish to add my name to his list of **objectors regarding the whole of his submission.**

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

**4. To make this legally compliant this modification should be subject to consultation with all residents within walking distance of the playing fields etc.. and potential developers should be consulted re the risk of flooding. To make his Strategy sound it should be changed back to Green belt or to Urban Greenspace, or a decision delayed to combine it with the strategy for South Prescott Action Area**

### **PART B – YOUR REPRESENTATIONS**

(This is a **SECOND** duplicate of Part B as my comments relate to 3 modifications)

Name and/or Organisation

Jennifer Kokosalakis

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

Modification  
Ref

M078, M168 & M272

Policy Ref

CS5, SUE1, SUE2a

Map extract **3 Knowsley  
Lane, Huyton**

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

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

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

I consider this is **NOT LEGALLY COMPLIANT** because there has not been sufficient consultation. I only know of one, Dr John Sills\*, who had heard of the proposals. I have not until this Wednesday, been aware, or notified of any council consultation on this matter, The Knowsley Park Lane lamp post notice and letter which he received, never appeared in Park Road, even though this proposal is in my vicinity. I am shocked KMBC's good record of consultation has not applied to this action.

**Not sound to change designation from Green Belt to for mixed employment and residential use.** I notice, as many areas of these proposed modifications, this area has been the location of playing fields and is partly wooded, which should be kept as such green spaces particularly since the council is aware that a high proportion of its population inhabit flats or terraced houses with little garden space, have low car ownership, are multiply deprived, have high average levels of bad & very bad and health and there is the obesity factor – all of which freely accessible local playing fields could be so beneficial and it is not just to replace these with yet more housing and any industry would be disadvantage financially by flooding. As with a number of these Core Strategy proposed modifications, the defined site is traversed by stream and probably farm ditches. Also by definition of the existence of the stream, it is the lowest point in the surrounding topography, which as well as this can be an unpleasant factor regarding light and outlook, this has no other housing, for obvious historic reasons - to be safe from potential flooding - which if housing is built here with increased hard surfaces of houses, roads, parking and hard landscaping and increasing danger from climate change, would intensify flash flood danger. Even if culverting is employed across the whole site, there could still be a danger in future of backing up. If the new development is kept clear of the lowest flood endangered land, this would reduce the numbers of housing and maybe become non cost-effective.

\* whose submission I have now had sight of and wish to add my name to his list of **objectors regarding the whole of his submission.**

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

4. To make this **legally compliant** this modification should be subject to consultation with all residents within walking distance of the playing fields etc.. and potential developers should be warned re the risk of flooding.

To make this strategy **SOUND it should be changed back to Green Belt**

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

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

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


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

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



**Signature**

**Date** 13/11/14

**I wish to emphasize that having heard from John Sills who had already submitted objections with supporting signatures, he has allowed me to peruse his submission and for me to state that I support his statements and wish my name/signature to be added to it retrospectively, so I here attach it to follow my own additional submission above. And place my signature here  again to confirm this.**



Dr J.A.Sills

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

████████████████████  
████████████████████  
9.11.2014

Dear Sirs,

Re KNOWSLEY LOCAL PLAN-PUBLIC CONSULTATION.  
LAND BOUNDED BY A58. (Whitaker's triangle),  
together with similar proposals  
for KNOWSLEY LANE and CARR LANE.

1. The Council have not publicised this matter as widely as in my view they should. Consultation (1.36 & 1.37 : CS09c: p8-9) is claimed to have been wide ranging and innovative. The first indication in my area was a notice placed on a lamp post, followed by a letter through the post. Given that this is a matter that affects the whole town surely the Council should have made every household aware of this very important matter. It seems to be the case that the owner of Dye House in the southwest corner of the A58 land/Whitaker's Triangle was not informed about the proposals to remove the land from the GREEN BELT. It is a further reflection of the lack of publicity that when I went, as advised, to the PRESCOT ONE STOP SHOP to view the documents, none of the staff on the desk appeared to know anything about this PLAN and they had to phone round before discovering that the documents were to be found in a plastic basket. I did not see any publicity about the PLAN in the ONE STOP SHOP. For such an important public consultation it seems as if the Council have done the minimum required. Furthermore in the letter there is reference to a PUBLIC CONSULTATION with an examination in public in November 2013 and July 2014. I have no recollection of being informed of such an EXAMINATION IN PUBLIC, and given the importance of such an examination on the GREEN BELT. had I been informed I would have made representations to the Council and the INSPECTOR. *Hence the LOCAL PLAN is unsound on the basis of the failure of the Council to carry out adequate consultation with the wider public. In particular the policies outlined Doc CS08c M049-65 Policy Ref CS1-CS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: p51: M168 (Doc CS08c: P51) new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC. The Council should therefore consider re-convening the public consultation process to take note of the views of local residents relating to the GREEN BELT proposals.*

2. It will be on record that this land was incorporated into the GREEN BELT in the early 1980's, following attempts to build office blocks on the land by SEARIDGE PROPERTIES. Councillor the late JIM LLOYD, the then Leader of the Council, was instrumental in the land being incorporated into the GREEN

BELT. Among the grounds for this decision, which will be available in the Planning Department was that the land would serve to provide a buffer between PRESCOT and the conurbations on the other side of the M57. This land is thus part of the M57 GREEN BELT CORRIDOR, designated as a STRATEGIC GREEN LINK. It is also noted that NATIONAL POLICY requires that GREEN BELT BOUNDARIES once set should be permanent. It is also the case that the land on KNOWSLEY LANE and CARR LANE also form part of this corridor. The land on KNOWSLEY LANE is the first patch of green land after 8 miles. This land greets travellers up PRESCOT ROAD from LIVERPOOL, when they go round the roundabout. Then on the second roundabout they are separated from the conurbation of PRESCOT by the A58/WHITAKER'S TRIANGLE site on the other side of the PRESCOT bypass.

3. Surely before any land in KNOWSLEY BOROUGH is taken out of the GREEN BELT all available BROWN FIELD SITES should be used up, rather than taking the soft option, which developers seek, of releasing GREEN BELT LAND, which once lost can never be regained. There have been 7 houses up for sale in KNOWSLEY PARK LANE over the past 2-3 years and only 3 have been sold; two recently, one has been taken off the market, two are still up for sale and one is currently being divided into two units. There are also a number of flats in ELM HOUSE up for sale. Thus there does not seem to be any great demand for housing in the local area of WHITAKER'S TRIANGLE. It is also a matter of record that recently there have been major housing developments in the local area: on the old Boys Grammar School site on St Helens Road, and on the old BICC site, where there has also been significant retail development. There are figures which suggest that there are significant numbers of unoccupied properties, (2020 properties figures for 2012, Knowsley Local Plan Monitoring Report: para 3.65 p32, and a potential for 5636 dwelling sites available) which together with a view that the housing targets are ambitious rather than realistic, would mean that the housing target of 8100 could almost,  $(2020+5636=7656)$  be achieved without utilising the GREEN BELT. In addition in the SHLAA Report of 2012: para 8.3, p 30) there is reference to the Borough having 12.6 years of capacity rather than 15 years. It must be a possibility that as the 12.6 years approach the situation regarding available brownfield land may have changed. In this context relating to housing there is no reference to any consultation with any local housing trusts. The other concern relating to the release of land from the GREEN BELT is that development on these sites will be more attractive to developers, (not to mention the capital appreciation of the value of the land following change from GREEN BELT status), so there is thus a real risk that brown field sites will not be developed, and may remain as blighted sites in the Borough, as former GREEN BELT sites are developed preferentially. GREEN BELT land once released and developed is lost forever. Hence the GREEN BELT should be protected as recommended recently by the Secretary of State, ERIC PICKLES, whose views on the use of GREEN BELT land (15.1.10) include: "incursions into the GREEN BELT must only occur in exceptional circumstances and must be planned in a logical and strategic way". In Document

Hearing Statement 5A from October 2013 there is also reference in para 5.1 to “exceptional circumstances” relating to GREEN BELT and in 5.1.1 the policy is amended to “Inappropriate development will not be permitted in the GREEN BELT unless very special circumstances can be demonstrated, and the visual and recreational amenities of the GREEN BELT will be preserved”. The current proposals can surely not be regarded as being exceptional circumstances particularly in the context of the latest guidance.

4. The main planning objections relate to CORE STRATEGY: Doc CS08c M049-65 Policy Ref CS1-CS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: M161, **p47: M157** and **p51: M168 (Doc CS08c: P51)**, new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC: “To bring forward new site allocations and policy guidance which will address the shortfall identified in the 5 year deliverable land supply for housing and the urgent needs for specific employment uses identified in the Inspector's Interim Findings (January 2014) and further matters identified during the Examination in Public”.

5. It is noted (Doc CS09a p64) that the NATIONAL PLANNING FRAMEWORK, states the five purposes of including land in the GREEN BELT:

1. To check unrestricted sprawl of large built-up areas.
1. To prevent neighbouring towns from merging into one another.
2. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In the case of the land bordered by the A58 and indeed the land on Knowsley Lane, and Carr Lane, these three sites currently check unrestricted sprawl, prevent merging of neighbouring towns, assist in safeguarding the countryside from encroachment, and in the case of the A58 land help to preserve the setting and special character of PRESCOT. PRESCOT is described in 2.22 (CS09b: p18) as having an older historic core, and in 2.38 the town centre is described as an area of particular historic interest with origins dating back to medieval times and with strong connections with the 18th and 19th century clock and watch manufacturing industries. Prescott Town centre is one of the 15 Conservation Areas of the Borough (2.40), and abuts into the southwest corner of the A58 land/Whitaker's Triangle.

6. Policy CS5 (p52 of Doc CS209a) states that “inappropriate development will not be permitted in the GREEN BELT except in very special circumstances in which it has been demonstrated that the harm to the Green Belt would be outweighed by other considerations”. In all submissions in para 6A (Doc CS209a) there is no specific discussion of the merits of this change in relation to the A58 land/Whitaker's Triangle. It is possible that there is a COVENANT on the use of the land established by the LORD DERBY, when the land was

released for housing along Knowsley Park Lane, which should be clarified by the Council.

7. In 5.41A (CS09a: p54) it states that the Council wishes to allow further development within previously developed sites in the Green Belt provided the openness of the Green Belt is preserved.

8. In Policy CS8 (CS09a: para 1&2: p 69) there is reference, for example, to ensuring more attractive and cleaner neighbourhoods, sustaining and promoting biodiversity, preserving the character and function of historic environments and valued landscapes, to provide local opportunities for sport, mitigating the effects of climate change and flood risk, mitigating air, water and noise pollution to protect and enhance strategically important areas of green space, promote effective movement of wildlife through a network of green strategic links. In para 4e (p70) there is reference to the M57 Green Belt corridor as a strategically green link. Developing on the GREEN BELT will counter to these aims.

9. In chapter 6 the only reference to the A58 land/Whitaker's Triangle is in para 6.45 (p95) where there is reference to "Land to the North West of Prescot for housing" and in chapter 6A the reference is to SUE 1 site e. There is a generic reference to the site in 6A 11 and whereas in SUE 2: 3(p105g) there is reference to supplementary planning documents for sites a-c, there is no specific reference to e. However in para 6A: 19, there is reference to the lack of necessity for supplementary planning, with a comment that Planning Applications would need to demonstrate a comprehensive approach to delivery of development within the site and to the provision of any necessary infrastructure or developer contributions. There is thus nowhere in this document any discussion about the particular merits or otherwise of including the A58 land/Whitaker's Triangle in SUE 1e and taking it out of the GREEN BELT, and in particular there is no discussion about the northern 10 acres currently used as school playing fields during the week and at weekend as pitches for local youth football teams. In this day and age, with the problems of weight in children, and indeed adults, there would seem to be no cogent reason to remove this part of the A58 land/Whitaker's Triangle from the GREEN BELT.

10. More discussion on this issue is however to be found in the Document SD32b "proposed Modifications Sustainable Appraisal Appendices". Incidentally this is a problem with attempting to comment on the Local Plan; there are so many documents that it is difficult to peruse them all, sift out the important paragraphs and collate a response. In this document in KGBS8, (pp198-202) there is reference to 3 options, for the A58/Whitakers site: 1) with housing density of 25dph, 2) allocation of the whole site and 3) housing with 30dph. The preferred options seem to be 1 or 3 as these two would keep the playing fields, whose benefits seem to be acknowledged. The benefits from removing the site from the GREEN BELT include a positive impact on reducing deprivation by stimulating investment and creating jobs in the construction sector (S1). This might be offset

by losses from reduction of current commercial activity on the site at the Nursery. Each of the options would however result in housing being built on a predominately greenfield site and unless appropriate mitigation measures were implemented could also lead to loss of priority habitat and mature trees which contribute to the character of the area. Each of the options has the potential to have a negative effect on the objectives that relate to the local character of the landscape and biodiversity particularly if they result in the loss of protected trees and areas of woodland and detrimental to the visual amenity. Hence if there is to be development on the site trees, habitat and environment should be protected. The site is seen as having good access and transport links, with easy access to local facilities within walking distance (S2). There are concerns over traffic (see para 21). In S6 there is discussion about the type of housing envisaged, and there seems to be an aim to have high quality housing together with option 2 (30dph) providing the better opportunity to include affordable housing. S8 deals with preserving, and enhancing Knowsley's rich diversity of cultural historical and archaeological buildings, areas, sites and features. The discussion focusses on the relationship with, and status of, the Conservation Area, the needs of this area and the view that each option could generate additional investment in the area and therefore help contribute to the conservation and enhancement of these historic assets. Of the options there was a view that option 3 would have less scope to adopt a sympathetic design and that this option 3 had the greater potential to have a negative impact on the setting of designated heritage assets. E1 comments on the protection, enhancement management of the local character while E2 comments on biodiversity and viability of protected and endangered species, habitats, biodiversity, and sites of geological importance. It was concluded that while the site is in a narrow gap between Huyton and Prescot, development in the location would not significantly affect reduce the gap. E3 acknowledges that there is a flooding risk, but in spite of lack of information about groundwater flooding, it is stated that *only isolated* locations within the area are likely to suffer groundwater flooding. Many of these issues are discussed in the following paragraphs.

11. Hence for such a strategic and important piece of land to be included in proposals relating to removal of land from the GREEN BELT, without any specific justification does not seem to indicate that any degree of consideration has been given to the merits of this proposed inclusion.

12. Knowsley Lane is another site: SUE 2a, where the green belt is threatened and where the comments in relation to SUE 1a are just as relevant.

13. In the case of the land bordered by the A58 land/Whitaker's Triangle and indeed the land on Knowsley Lane, and on Carr Lane, these are all in the M57 corridor and currently check unrestricted sprawl, prevent merging of neighbouring towns, assist in safeguarding the countryside from encroachment, and in the case of the A58 land help to preserve the setting and special character of Prescot. The town is described in 2.22 (CS09b: p18) as having an

older historic core, and in 2.38 the town centre is described as an area of particular historic interest with origins dating back to medieval times and strong connections with the 18th and 19th century clock and watch manufacturing industries. Prescott Town centre is one of the 15 Conservation Areas of the Borough (2.40), and abuts into the southwest corner of the A58 land/Whitaker's Triangle.

14. It is thus noted that the south eastern corner of the site falls within the PRESCOT CONSERVATION AREA, and thus this part of the site should not be touched in any development.

15. Only by preserving the GREEN BELT status of the land will the visual and recreational amenities be preserved. It is worthy of note that the northern one third of the site (10 acres) is taken up by playing fields for the pupils of KNOWSLEY PARK CENTRE FOR LEARNING, and also for local football teams at weekends, and in this day and age with the problems of obesity in both adults and young people it would seem hypocritical to take playing fields away from young people. It is a matter of record that the original school site on St Helens Road, which did have some playing fields attached was ultimately sold by the Council.

16. Development of the site would therefore be inherently encroaching and harmful to the landscape character.

17. The COUNCIL should be minded of the Secretary of State, ERIC PICKLES' views on the use of GREEN BELT land (15.1.10): "incursions into the GREEN BELT must only occur in exceptional circumstances and must be planned in a logical and strategic way". In the context of this statement Mr Pickles stated that the area in question: BLACKMORE "was an almost unique Essex village of a type that was rapidly disappearing, it unusually retained its medieval road patterns and is nationally renowned for its fine church and its Tudor links. Any development should be sympathetic to the heritage of BLACKMORE". Much of this could be applied to PRESCOT, which has a long history, its original street layout and a fine church, and has a Conservation Area. Development on the site would be detrimental to its visual amenity.

18. Furthermore the COUNCIL should be aware of the new guidance to reinforce green belt protection (October 2014) updated by the DEPARTMENT FOR COMMUNITIES AND LOCAL GOVERNMENT to underline the NATIONAL PLANNING POLICY FRAMEWORK. According to the guidance when council is assessing the availability and suitability of land to meet its housing need during local plan preparations, it should take account of any constraints such as green belt which "indicate that development should be restricted and which may retrain the ability of an authority to meet its targets". According to the guidance unmet housing need, including for traveller sites, is unlikely to outweigh the harm to the green belt and other harm to constitute the "very special circumstances" justifying

inappropriate development on a site within the green belt. Mr ERIC PICKLES is quoted as stating: "This Government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or to see the vital green lungs around their towns and cities [used for] unnecessary development. Today's guidance will ensure councils can meet their housing needs by prioritising BROWNFIELD SITES, and fortify the GREEN BELT in their area". Planning Minister BRANDON LEWIS is quoted as stating that "We have put Local Plans at the heart of the reformed planning system so councils and LOCAL PEOPLE can now decide where development should and shouldn't go". Hence the COUNCIL should be heeding this latest GOVERNMENT GUIDANCE and taking note of what THE PEOPLE want in terms of GREEN BELT, ie that the GREEN BELT should not be sacrificed. Exceptional circumstances do not therefore exist to justify removing land from the GREEN BELT. It is also worthy of note that in a document from the LANDSCAPE INSTITUTION, entitled "PROFITABLE PLACES", there is a chapter heading: "Investment in a high quality landscape pays dividends as customers are willing to pay more for it". It is likely preparation of brownfield sites may be expensive to develop. Hence there is thus the risk that developers will seek to preferentially develop in released GREEN BELT, thus leaving unused brownfield sites still abandoned and unused. The Council should take note that MOLE VALLEY COUNCIL are considering abandoning their "Housing and Traveller Sites Plan REKS20131405C-015" in the light of this new guidance.

19. In any general consideration of the GREEN BELT, the Council should also be aware of the NATURE AND WELLBEING ACT, which is a piece of legislation to bring about the recovery of nature in a generation for the benefit of people and wildlife. Reducing the GREEN BELT runs counter to the aims of this Act. There would be additional concern over the effect of removing the sites from the GREEN BELT on traffic, which is likely to increase and thus contribute to affecting adversely the air quality, through gas and particulate emissions, and there would also be a contribution to an increase in CO2 from the loss of greenery.

20. Currently on part of the site is a Garden Centre which employs around 25 people. If the land were to be taken out of the GREEN BELT, and if the business could not continue there would thus be a significant effect on employment for local people.

21. More specifically there are other concerns about the site and the proposed 133 dwellings. This is likely to generate at least 133 traffic movements off the site in the morning and evening and there must thus be concern over access. Access cannot be off the bypass (A58) as any access would have to be on the crown of the bend where traffic would be at maximum speed. In contrast the access to and from the Safari Park is on the outside of the curve of the A58, with deceleration and acceleration lanes with good sight lines. Access off the upper part of the

bypass was considered inappropriate for the school when it was being built and the proposed access had better sight lines and was on a straight part of the bypass. If the access was onto KNOWSLEY PARK LANE, then this would add to the existing chaos that reigns twice a day when there is school traffic. If the access was off Liverpool Road where the Garden centre access is situated, then as the road is a dual carriageway all traffic would have to turn left while those wishing to go to the M57 or down into LIVERPOOL would be tempted to make a U-turn by the CLOCK FACE Public House, with significant risks of accidents. If the access was to be at the traffic lights opposite MANCHESTER ROAD, then this would contribute to congestion given the sequencing requirements of the junction. There is also the question of infrastructure to support 133 house such as school places, and access to General Medical Practitioners. The traffic generated by the vehicles movements on and around the site would also contribute to more environmental pollution.

22. There are concerns too about the site from a housing and traffic perspective. The traffic on the Prescott bypass generates significant background noise, which would be a problem for anyone purchasing buildings on the site. There is dampness in the centre from springs and streams, and thus a risk of flooding and even of householders being unable to secure appropriate insurance. In addition there could be contamination of the land, which would require management.

23. The main water main from the Prescott Reservoir into Liverpool runs through the grounds of the school across KNOWSLEY PARK LANE at number 37, where there is no house, and then across the site, under the M57 towards HUYTON, down Prescott Road and into Liverpool. There have been major leaks in the past from the mains, down in HUYTON, and hence building over the main water main might not be sensible or accepted by UNITED UTILITIES.

24. If more commercial development were to be permitted it is to be hoped that the COUNCIL will monitor any developments more assiduously than in the past. I believe that the new GARDEN CENTRE roof may have been built higher than was granted in the original Planning Application, and furthermore the builders yard may not been granted formal Planning Permission. Perhaps the COUNCIL can check this out as it must be a matter of record.

25. There are also concerns about wildlife. The hedges provide an environment for birds, small mammals have been seen on the site, and bats are also seen and may be roosting in buildings either on the site or close to it. It is noted that KNOWSLEY claims according to items in a display cabinet in the HUYTON ONE STOP SHOP, to be Britain's GREENEST BOROUGH and in addition has 16 GREEN FLAG PARKS. There is also the KNOWSLEY GREEN SPACE STRATEGY, which discusses the benefits of green space especially chapter 5 and paras 6.3a and 7.2.

26. The COUNCIL should also be aware that there is some concern that should



these areas of land be removed from the protection of the GREEN BELT status, there could be planning applications for FRACKING.

27. In addition there must be concern that if there are any legal proceedings following the LOCAL PLAN, this could produce further financial strains on the Borough, which has to find £34m in savings (letter from the Leader of the Council, Councillor R.J.ROUND: October 2014)

28. I wish to indicate that I would wish to have the opportunity to participate in in any Public Hearing, as would the attached co-signatories.

29. I really do think that the Council should be recognising the strength of feeling expressed by THE PEOPLE, particularly in Knowsley Village, in the Knowsley Lane locality, in Halewood, in Whiston and in Prescot. The Council should let THE PEOPLE have a voice in determining what happens to the GREEN BELT and should not allow changes in the GREEN BELT to be led by developers. They should also be taking note of recent GUIDANCE and THE COUNCIL should have the COURAGE to resist these attempts at what amounts to VANDALISM of the GREEN BELT.

30. I am happy to discuss this further; [REDACTED]

Yours faithfully,

John Sills



**Knowsley Local Plan: Core Strategy**

Proposed Modifications - Consultation  
Representations Form

Knowsley Council



**RETURNING THIS FORM**

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

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

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Miss	Solicitor
Name	Jenny Jones	Middleton Solicitors
Job Title (if appropriate)	Nursery Manager	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I object to this proposal. Knowsley Village is a well sort after area for it's close community, history, location and especially for it's green spaces and woodland. For all that time here, we admire the greenland and woods available to us. As children we loved playing in the woods morning till night. I have two children, one at the age of playing at. My child loves telling me about playing in the woods with friends, having lots of space and fun! We love and have so many memories of 'The Wreck', 'Big Spook' and 'Little Spook', as many may refer to!

I live on Knowsley Lane, and at present it's a nightmare parking outside the house and entering in & out of the drive. Peak hour 5-6 pm is horrendous. Just think how Knowsley Lane will be if this proposal was to go ahead. Knowsley Lane would become a motorway right next door to the M62 as it stands. My son has to cross Knowsley Lane of a morning to catch his school bus, as it remains so busy we have to personally cross him across safely. The amount of traffic will be unbearable.

Knowsley Village was NOT aimed at housing more people than it already has, things would not be the same.

Please DONT DESTROY  
OUR COMMUNITY \*\*\*

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature. 

Date... 11<sup>th</sup> November 2014



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

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**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	JOAO GROVES	Middleton Solicitors
Job Title (if appropriate)	Accountant	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

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Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.



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

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I do not agree with the removal of Knowsley Village from the Green Belt. This has always been a village & any removal would damage our status. Knowsley Village Heritage goes as far as the Poole's Day Book

Continue on a separate sheet if necessary...

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

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

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

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

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

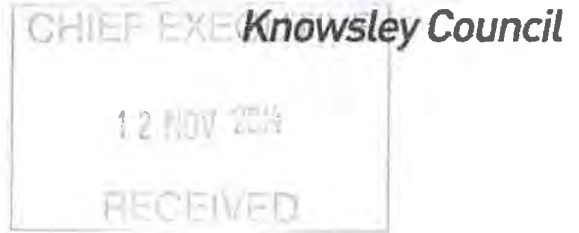
Signature  .....

Date.....<sup>11</sup>.....November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



### RETURNING THIS FORM

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

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

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

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	JOHN M <sup>C</sup> CORMACK	
Job Title (if appropriate)	DIRECTOR	
Organisation (if appropriate)	ALLERTON GARDEN. & TREE SERVICES	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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

**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

K9BS14

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

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

I moved here 13 years ago to live in a little bit of the country. If the proposal goes ahead there will be no country, trees and walks for our dogs. It is also a nightmare to get out of Whiston to Liverpool. Where I do 95% of my work. What will it be like if this goes through. Noise and pollution also worry me.

Continue on a separate sheet if necessary...

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

Utilise brown field land & disused properties and also public consultations should be quicker and better. ie more advertisement to inform the public

Continue on a separate sheet if necessary...

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

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

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

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

Signature



Date

1/11/14

Dr J.A.Sills

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



9.11.2014

Dear Sirs,

Re KNOWSLEY LOCAL PLAN-PUBLIC CONSULTATION.  
LAND BOUNDED BY A58. (Whitaker's triangle).  
together with similar proposals  
for KNOWSLEY LANE and CARR LANE.

1. The Council have not publicised this matter as widely as in my view they should. Consultation (1.36 & 1.37 : CS09c: p8-9) is claimed to have been wide ranging and innovative. The first indication in my area was a notice placed on a lamp post, followed by a letter through the post. Given that this is a matter that affects the whole town surely the Council should have made every household aware of this very important matter. It seems to be the case that the owner of Dye House in the southwest corner of the A58 land/ Whitaker's Triangle was not informed about the proposals to remove the land from the GREEN BELT. It is a further reflection of the lack of publicity that when I went, as advised, to the PRESCOT ONE STOP SHOP to view the documents, none of the staff on the desk appeared to know anything about this PLAN and they had to phone round before discovering that the documents were to be found in a plastic basket. I did not see any publicity about the PLAN in the ONE STOP SHOP. For such an important public consultation it seems as if the Council have done the minimum required. Furthermore in the letter there is reference to a PUBLIC CONSULTATION with an examination in public in November 2013 and July 2014. I have no recollection of being informed of such an EXAMINATION IN PUBLIC, and given the importance of such an examination on the GREEN BELT. had I been informed I would have made representations to the Council and the INSPECTOR. *Hence the LOCAL PLAN is unsound on the basis of the failure of the Council to carry out adequate consultation with the wider public. In particular the policies outlined Doc CS08c M049-65 Policy Ref CS1-CS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: p51: M168 (Doc CS08c: P51) new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC. The Council should therefore consider re-convening the public consultation process to take note of the views of local residents relating to the GREEN BELT proposals.*

2. It will be on record that this land was incorporated into the GREEN BELT in the early 1980's, following attempts to build office blocks on the land by SEARIDGE PROPERTIES. Councillor the late JIM LLOYD, the then Leader of the Council, was instrumental in the land being incorporated into the GREEN BELT. Among the grounds for this decision, which will be available in the Planning Department was that the land would serve to provide a buffer between PRESCOT and the conurbations on the other side of the M57. This land is thus part of the M57 GREEN BELT CORRIDOR, designated as a STRATEGIC GREEN LINK. It is also noted that NATIONAL POLICY requires that GREEN BELT BOUNDARIES once set should be permanent. It is also the case that the land on KNOWSLEY LANE and CARR LANE also form part of this corridor. The land on KNOWSLEY LANE is the first patch of green land after 8 miles. This land greets travellers

up PRESCOT ROAD from LIVERPOOL , when they go round the roundabout. Then on the second roundabout they are separated from the conurbation of PRESCOT by the A58/ WHITAKER'S TRIANGLE site on the other side of the PRESCOT bypass.

3. Surely before any land in KNOWSLEY BOROUGH is taken out of the GREEN BELT all available BROWN FIELD SITES should be used up, rather than taking the soft option, which developers seek, of releasing GREEN BELT LAND, which once lost can never be regained. There have been 7 houses up for sale in KNOWSLEY PARK LANE over the past 2-3 years and only 3 have been sold; two recently, one has been taken off the market, two are still up for sale and one is currently being divided into two units. There are also a number of flats in ELM HOUSE up for sale. Thus there does not seem to be any great demand for housing in the local area of WHITAKER'S TRIANGLE. It is also a matter of record that recently there have been major housing developments in the local area: on the old Boys Grammar School site on St Helens Road, and on the old BICC site, where there has also been significant retail development. There are figures which suggest that there are significant numbers of unoccupied properties, (2020 properties figures for 2012, Knowsley Local Plan Monitoring Report: para 3.65 p32, and a potential for 5636 dwelling sites available) which together with a view that the housing targets are ambitious rather than realistic, would mean that the housing target of 8100 could almost, (2020+5636=7656) be achieved without utilising the GREEN BELT. In addition in the SHLAA Report of 2012: para 8.3, p 30) there is reference to the Borough having 12.6 years of capacity rather than 15 years. It must be a possibility that as the 12.6 years approach the situation regarding available brownfield land may have changed. In this context relating to housing there is no reference to any consultation with any local housing trusts. The other concern relating to the release of land from the GREEN BELT is that development on these sites will be more attractive to developers, (not to mention the capital appreciation of the value of the land following change from GREEN BELT status), so there is thus a real risk that brown field sites will not be developed, and may remain as blighted sites in the Borough, as former GREEN BELT sites are developed preferentially. GREEN BELT land once released and developed is lost forever. Hence the GREEN BELT should be protected as recommended recently by the Secretary of State, ERIC PICKLES, whose views on the use of GREEN BELT land (15.1.10) include: "incursions into the GREEN BELT must only occur in exceptional circumstances and must be planned in a logical and strategic way". In Document Hearing Statement 5A from October 2013 there is also reference in para 5.1 to "exceptional circumstances" relating to GREEN BELT and in 5.1.1 the policy is amended to "Inappropriate development will not be permitted in the GREEN BELT unless very special circumstances can be demonstrated, and the visual and recreational amenities of the GREEN BELT will be preserved". The current proposals can surely not be regarded as being exceptional circumstances particularly in the context of the latest guidance.

4. The main planning objections relate to CORE STRATEGY: Doc CS08c M049-65 Policy Ref CS1-CS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: M161, **p47: M157 and p51: M168 (Doc CS08c: P51)**, new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC: "To bring forward new site allocations and policy guidance which will address the shortfall identified in the 5 year deliverable land supply for housing and the urgent needs for specific employment uses identified in the Inspector's Interim Findings (January 2014) and further matters identified during the Examination in Public".

5. It is noted (Doc CS09a p64) that the NATIONAL PLANNING FRAMEWORK, states the five purposes of including land in the GREEN BELT:

1. To check unrestricted sprawl of large built-up areas.
2. To prevent neighbouring towns from merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In the case of the land bordered by the A58 and indeed the land on Knowsley Lane, and Carr Lane, these three sites currently check unrestricted sprawl, prevent merging of neighbouring towns, assist in safeguarding the countryside from encroachment, and in the case of the A58 land help to preserve the setting and special character of PRESCOT. PRESCOT is described in 2.22 (CS09b: p18) as having an older historic core, and in 2.38 the town centre is described as an area of particular historic interest with origins dating back to medieval times and with strong connections with the 18th and 19th century clock and watch manufacturing industries. Prescott Town centre is one of the 15 Conservation Areas of the Borough (2.40), and abuts into the southwest corner of the A58 land/Whitaker's Triangle.

6. Policy CS5 (p52 of Doc CS209a) states that "inappropriate development will not be permitted in the GREEN BELT except in very special circumstances in which it has been demonstrated that the harm to the Green Belt would be outweighed by other considerations". In all submissions in para 6A (Doc CS209a) there is no specific discussion of the merits of this change in relation to the A58 land/Whitaker's Triangle. It is possible that there is a COVENANT on the use of the land established by the LORD DERBY, when the land was released for housing along Knowsley Park Lane, which should be clarified by the Council.

7. In 5.41A (CS09a: p54) it states that the Council wishes to allow further development within previously developed sites in the Green Belt provided the openness of the Green Belt is preserved.

8. In Policy CS8 (CS09a: para 1&2: p 69) there is reference, for example, to ensuring more attractive and cleaner neighbourhoods, sustaining and promoting biodiversity, preserving the character and function of historic environments and valued landscapes, to provide local opportunities for sport, mitigating the effects of climate change and flood risk, mitigating air, water and noise pollution to protect and enhance strategically important areas of green space, promote effective movement of wildlife through a network of green strategic links. In para 4e (p70) there is reference to the M57 Green Belt corridor as a strategically green link. Developing on the GREEN BELT will counter to these aims.

9. In chapter 6 the only reference to the A58 land/Whitaker's Triangle is in para 6.45 (p95) where there is reference to "Land to the North West of Prescott for housing" and in chapter 6A the reference is to SUE 1 site e. There is a generic reference to the site in 6A 11 and whereas in SUE 2: 3(p105g) there is reference to supplementary planning documents for sites a-c, there is no specific reference to e. However in para 6A: 19, there is reference to the lack of necessity for supplementary planning, with a comment that Planning Applications would need to demonstrate a comprehensive approach to delivery of development within the site and to the provision of any necessary infrastructure or developer contributions. There is thus nowhere in this document any discussion about the particular merits or otherwise of including the A58 land/Whitaker's Triangle in SUE 1e and taking it out of the GREEN BELT, and in particular there is no discussion about the northern 10 acres currently used as school playing fields during the week and at weekend

as pitches for local youth football teams. In this day and age, with the problems of weight in children, and indeed adults, there would seem to be no cogent reason to remove this part of the A58 land/Whitaker's Triangle from the GREEN BELT.

10. More discussion on this issue is however to be found in the Document SD32b "proposed Modifications Sustainable Appraisal Appendices". Incidentally this is a problem with attempting to comment on the Local Plan; there are so many documents that it is difficult to peruse them all, sift out the important paragraphs and collate a response. In this document in KGBS8, (pp198-202) there is reference to 3 options, for the A58/Whitakers site: 1) with housing density of 25dph, 2) allocation of the whole site and 3) housing with 30dph. The preferred options seem to be 1 or 3 as these two would keep the playing fields, whose benefits seem to be acknowledged. The benefits from removing the site from the GREEN BELT include a positive impact on reducing deprivation by stimulating investment and creating jobs in the construction sector (S1). This might be offset by losses from reduction of current commercial activity on the site at the Nursery. Each of the options would however result in housing being built on a predominately greenfield site and unless appropriate mitigation measures were implemented could also lead to loss of priority habitat and mature trees which contribute to the character of the area. Each of the options has the potential to have a negative effect on the objectives that relate to the local character of the landscape and biodiversity particularly if they result in the loss of protected trees and areas of woodland and detrimental to the visual amenity. Hence if there is to be development on the site trees, habitat and environment should be protected. The site is seen as having good access and transport links, with easy access to local facilities within walking distance (S2). There are concerns over traffic (see para 21). In S6 there is discussion about the type of housing envisaged, and there seems to be an aim to have high quality housing together with option 2 (30dph) providing the better opportunity to include affordable housing. S8 deals with preserving, and enhancing Knowsley's rich diversity of cultural historical and archaeological buildings, areas, sites and features. The discussion focusses on the relationship with, and status of, the Conservation Area, the needs of this area and the view that each option could generate additional investment in the area and therefore help contribute to the conservation and enhancement of these historic assets. Of the options there was a view that option 3 would have less scope to adopt a sympathetic design and that this option 3 had the greater potential to have a negative impact on the setting of designated heritage assets. E1 comments on the protection, enhancement management of the local character while E2 comments on biodiversity and viability of protected and endangered species, habitats, biodiversity, and sites of geological importance. It was concluded that while the site is in a narrow gap between Huyton and Prescot, development in the location would not significantly affect reduce the gap. E3 acknowledges that there is a flooding risk, but in spite of lack of information about groundwater flooding, it is stated that *only isolated* locations within the area are likely to suffer groundwater flooding. Many of these issues are discussed in the following paragraphs.

11. Hence for such a strategic and important piece of land to be included in proposals relating to removal of land from the GREEN BELT, without any specific justification does not seem to indicate that any degree of consideration has been given to the merits of this proposed inclusion.

12. Knowsley Lane is another site: SUE 2a, where the green belt is threatened and where the comments in relation to SUE 1a are just as relevant.



13. In the case of the land bordered by the A58 land/Whitaker's Triangle and indeed the land on Knowsley Lane, and on Carr Lane, these are all in the M57 corridor and currently check unrestricted sprawl, prevent merging of neighbouring towns, assist in safeguarding the countryside from encroachment, and in the case of the A58 land help to preserve the setting and special character of Prescott. The town is described in 2.22 (CS09b: p18) as having an older historic core, and in 2.38 the town centre is described as an area of particular historic interest with origins dating back to medieval times and strong connections with the 18th and 19th century clock and watch manufacturing industries. Prescott Town centre is one of the 15 Conservation Areas of the Borough (2.40), and abuts into the southwest corner of the A58 land/Whitaker's Triangle.

14. It is thus noted that the south eastern corner of the site falls within the PRESCOT CONSERVATION AREA, and thus this part of the site should not be touched in any development.

15. Only by preserving the GREEN BELT status of the land will the visual and recreational amenities be preserved. It is worthy of note that the northern one third of the site (10 acres) is taken up by playing fields for the pupils of KNOWSLEY PARK CENTRE FOR LEARNING, and also for local football teams at weekends, and in this day and age with the problems of obesity in both adults and young people it would seem hypocritical to take playing fields away from young people. It is a matter of record that the original school site on St Helens Road, which did have some playing fields attached was ultimately sold by the Council.

16. Development of the site would therefore be inherently encroaching and harmful to the landscape character.

17. The COUNCIL should be minded of the Secretary of State, ERIC PICKLES' views on the use of GREEN BELT land (15.1.10): "incursions into the GREEN BELT must only occur in exceptional circumstances and must be planned in a logical and strategic way". In the context of this statement Mr Pickles stated that the area in question: BLACKMORE "was an almost unique Essex village of a type that was rapidly disappearing, it unusually retained its medieval road patterns and is nationally renowned for its fine church and its Tudor links. Any development should be sympathetic to the heritage of BLACKMORE". Much of this could be applied to PRESCOT, which has a long history, its original street layout and a fine church, and has a Conservation Area. Development on the site would be detrimental to its visual amenity.

18. Furthermore the COUNCIL should be aware of the new guidance to reinforce green belt protection (October 2014) updated by the DEPARTMENT FOR COMMUNITIES AND LOCAL GOVERNMENT to underline the NATIONAL PLANNING POLICY FRAMEWORK. According to the guidance when council is assessing the availability and suitability of land to meet its housing need during local plan preparations, it should take account of any constraints such as green belt which "indicate that development should be restricted and which may retrain the ability of an authority to met its targets". According to the guidance unmet housing need, including for traveller sites, is unlikely to outweigh the harm to the green belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the green belt. Mr ERIC PICKLES is quoted as stating: "This Government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or to see the vital green lungs around their towns and cities [used for] unnecessary development. Today's guidance will ensure councils can

meet their housing needs by prioritising BROWNFIELD SITES, and fortify the GREEN BELT in their area". Planning Minister BRANDON LEWIS is quoted as stating that "We have put Local Plans at the heart of the reformed planning system so councils and LOCAL PEOPLE can now decide where development should and shouldn't go". Hence the COUNCIL should be heeding this latest GOVERNMENT GUIDANCE and taking note of what THE PEOPLE want in terms of GREEN BELT, ie that the GREEN BELT should not be sacrificed. Exceptional circumstances do not therefore exist to justify removing land from the GREEN BELT. It is also worthy of note that in a document from the LANDSCAPE INSTITUTION, entitled "PROFITABLE PLACES", there is a chapter heading: "Investment in a high quality landscape pays dividends as customers are willing to pay more for it". It is likely preparation of brownfield sites may be expensive to develop. Hence there is thus the risk that developers will seek to preferentially develop in released GREEN BELT, thus leaving unused brownfield sites still abandoned and unused. The Council should take note that MOLE VALLEY COUNCIL are considering abandoning their "Housing and Traveller Sites Plan REKS20131405C-015" in the light of this new guidance.

19. In any general consideration of the GREEN BELT, the Council should also be aware of the NATURE AND WELLBEING ACT, which is a piece of legislation to bring about the recovery of nature in a generation for the benefit of people and wildlife. Reducing the GREEN BELT runs counter to the aims of this Act. There would be additional concern over the effect of removing the sites from the GREEN BELT on traffic, which is likely to increase and thus contribute to affecting adversely the air quality, through gas and particulate emissions, and there would also be a contribution to an increase in CO2 from the loss of greenery.

20. Currently on part of the site is a Garden Centre which employs around 25 people,. If the land were to be taken out of the GREEN BELT, and if the business could not continue there would thus be a significant effect on employment for local people.

21. More specifically there are other concerns about the site and the proposed 133 dwellings. This is likely to generate at least 133 traffic movements off the site in the morning and evening and there must thus be concern over access. Access cannot be off the bypass (A58) as any access would have to be on the crown of the bend where traffic would be at maximum speed. In contrast the access to and from the Safari Park is on the outside of the curve of the A58, with deceleration and acceleration lanes with good sight lines. Access off the upper part of the bypass was considered inappropriate for the school when it was being built and the proposed access had better sight lines and was on a straight part of the bypass. If the access was onto KNOWSLEY PARK LANE, then this would add to the existing chaos that reigns twice a day when there is school traffic. If the access was off Liverpool Road where the Garden centre access is situated, then as the road is a dual carriageway all traffic would have to turn left while those wishing to go to the M57 or down into LIVERPOOL would be tempted to make a U-turn by the CLOCK FACE Public House, with significant risks of accidents. If the access was to be at the traffic lights opposite MANCHESTER ROAD, then this would contribute to congestion given the sequencing requirements of the junction. There is also the question of infrastructure to support 133 house such as school places, and access to General Medical Practitioners. The traffic generated by the vehicles movements on and around the site would also contribute to more environmental pollution.

22. There are concerns too about the site from a housing and traffic perspective. The traffic on the Prescot bypass generates significant background noise, which would be a problem for anyone purchasing buildings on the site. There is dampness in the centre from springs and streams, and thus a risk of flooding and even of householders being unable to secure appropriate insurance. In addition there could be contamination of the land, which would require management.

23. The main water main from the Prescot Reservoir into Liverpool runs through the grounds of the school across KNOWSLEY PARK LANE at number 37, where there is no house, and then across the site, under the M57 towards HUYTON, down Prescot Road and into Liverpool. There have been major leaks in the past from the mains, down in HUYTON, and hence building over the main water main might not be sensible or accepted by UNITED UTILITIES.

24. If more commercial development were to be permitted it is to be hoped that the COUNCIL will monitor any developments more assiduously than in the past. I believe that the new GARDEN CENTRE roof may have been built higher than was granted in the original Planning Application, and furthermore the builders yard may not been granted formal Planning Permission. Perhaps the COUNCIL can check this out as it must be a matter of record.

25. There are also concerns about wildlife. The hedges provide an environment for birds, small mammals have been seen on the site, and bats are also seen and may be roosting in buildings either on the site or close to it. It is noted that KNOWSLEY claims according to items in a display cabinet in the HUYTON ONE STOP SHOP, to be Britain's GREENEST BOROUGH and in addition has 16 GREEN FLAG PARKS. There is also the KNOWSLEY GREEN SPACE STRATEGY, which discusses the benefits of green space especially chapter 5 and paras 6.3a and 7.2.

26. The COUNCIL should also be aware that there is some concern that should these areas of land be removed from the protection of the GREEN BELT status, there could be planning applications for FRACKING.

27. In addition there must be concern that if there are any legal proceedings following the LOCAL PLAN, this could produce further financial strains on the Borough, which has to find £34m in savings (letter from the Leader of the Council, Councillor R.J.ROUND: October 2014)

28. I wish to indicate that I would wish to have the opportunity to participate in in any Public Hearing, as would the attached co-signatories.

29. I really do think that the Council should be recognising the strength of feeling expressed by THE PEOPLE, particularly in Knowsley Village, in the Knowsley Lane locality, in Halewood, in Whiston and in Prescot. The Council should let THE PEOPLE have a voice in determining what happens to the GREEN BELT and should not allow changes in the GREEN BELT to be led by developers. They should also be taking note of recent GUIDANCE and THE COUNCIL should have the COURAGE to resist these attempts at what amounts to VANDALISM of the GREEN BELT.

30. I am happy to discuss this further; [REDACTED]

Yours faithfully,

[REDACTED]

John Sills

# KNOXSLBY LOCAL PLAN

CHIEF EXECUTIVE

12 NOV 2014

WE HAVE READ THE SUBMISSION OF JOHN SILES AND AGREE WITH HIS COMMENTS - WE CONSIDER THAT KNOXSLBY GREEN BELT SHOULD BE PROTECTED PARTICULARLY THE ASB/WHITALEYS TRANGLE.

PETER REILLY

IAN J. CARRIER,

JANE REILLY

Paul Williams

John Holland

Johanna Robinson

M A Hudson

B Hudson

Rubian

Mrs Fabian

Shen

James Brady

A M SWIFT

J Thurgeson

J. Thurgeson

V. Haycock

Roy Haycock

Jennifer Stott

Julia McElhenny

Ron Stott

Jan Sumner

P. L. Francis

Lisa Ellis

Ken Pearson

Sean Atkinson

Ray Wood.

PA MUMFORD

D Mackie

Oneslott

~~Handwritten signature~~  
Stark  
P Cook

JAMES COOK

MR + MRS P A LANGRISH

Dr E. J. Zwiderwijk

T W BIRCH

D. F. CALLAN

J. CALLAN

Paul Atkinson

MARK BURKE

S HARRIS

GLENNEKDALE

Ann Nicholson.

RANDALLS

R. Edward

Geff Gilborn

~~Handwritten signature~~

Low



# Knowsley Local Plan: Core Strategy

Knowsley Council

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE  
13 NOV 2014  
RECEIVED

### RETURNING THIS FORM

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

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

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

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

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JOHN WEBSTER (JUNIOR)	
Job Title (if appropriate)	RETIRED TEACHER	
Organisation (if appropriate)	ROBY RESIDENTS ACTION GROUP	
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	[REDACTED]	

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

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

**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation JOHN WEBSTER (JUNIOR) ROBY RESIDENTS ACTION GROUP

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

EDENHURST AVE GREENBELT SPORTSFIELD SITE

Modification Ref M168 Policy Ref  Paragraph Ref

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

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

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

K.M.B.C. has not given reasons other than 'pressure' as to why it is countermending its own logical reasoned arguments for the retention of the Sportsfield within greenbelt status in the 2008 U.D.R. consultation.

We support all of their valid, sound and robust arguments given then by council and endorse our Chief Executive Officer, Mrs Sheena Ramsey's current 'New Green Space Strategy' document dated 19/6/2014 entitled 'The Natural Approach to a Thriving Borough' which supports all our arguments for the retention of this sportsfield site within the greenbelt; as does its Secretary for Local Governments arguments 4/10/2014 Daily Telegraph news paper 'New Protection for Englands Greenbelt'

The proposed modification is therefore not legally compliant/sound in respecting the views of these two prominent persons.

Continue on a separate sheet if necessary...  
continued



JOHN WEBSTER (JUNIOR) ROBY RESIDENTS ACTION GROUP  
Edenhurst Avenue Sportsfield Site  
Representation Part B 3.

The modification needs to be legally challenged due to the complicity of officers of KMBC taking their orders from the single ~~party~~ political party in office and complying to their dictate. This is fundamentally undemocratic and local government at its worst, with members not representing their constituents by attending public hearings or answering the repeated call for public meetings to be convened in our ROBY WARD of Kestley Borough.

Planning Officers are complicit like members in minimum engagement with residents with no public meetings or forums or residents association meetings attended in ROBY WARD only one 'drop in' event at Court New Park with no Q and A session or organised structured meeting.

Despite repeated calls to members of Roby Ward for the necessity of a ward public meeting or association meeting; no response has been received to my six emails in total to all three of them.

If officers are complicit in minimum engagement with residents is there not a legal obligation for them to overcome in order to attempt to engage with the majority?

Consultation has only covered 20% of the Bowing Estate by leaflet drop therefore 80% of residents remain ignorant of the likes of public hearings, representation forms, modifications etc.

No public Q&A Meetings/Forums have been conducted by officers which should be the norm in a more democratic local authority. This consultation has failed and must therefore be legally challenged.

continued

2

JOHN WEBSTER ROBY RESIDENTS ACTION GROUP

Edenhurst Avenue Sportsfield Site

Representation Part B 3

K.M.B.C. actions prevent 'on site inspection' of site, which we legally challenge.

In order to appreciate the wild natural beauty of this priority habitat green open space sportsfield and realise the problem's impact of blocked/restricted views as far as Runcorn Bridge over the River Mersey and the water surface drainage issues associated with the valley sump site; it is necessary to experience an 'on site' inspection, that is an 'actual walkabout on the site surface'.

Like the government inspector Mr Martin Pike I have been prevented from carrying out a survey / inspection of trees, ~~and~~ vegetation and animal life — a tree preservation order exists on this site and needs to be checked.

We are not stopped by the OWNER whom I have consulted BUT by K.M.B.C. who have ~~spent~~ used public funds on this private site to the extent of erecting 'PRIVATE LAND KEEP OFF' notices the length of Edenhurst Avenue and barbed wire along the eastern side of the site, with constant railings repairs to the perimeter of the site.

The security of the site was used as a positive endorsement for development by Pegasus. We therefore accuse K.M.B.C. working with the Owner/Pegasus/Taylor Wimpey in order to secure the site, using public funds, in order to benefit the speculators/developers interests.

We wish to make a legal challenge, as the public funded work by K.M.B.C. has excluded local residents from accessing the greenbelt for recreational purposes and importantly preventing a proper 'on site inspection', to our

3/

JOHN WEBSTER ROBY RESIDENTS ACTION GROUP  
Edenhurst Avenue Sportsfield Site.  
Representation Part B 3

detriment, by the government inspector.

We therefore request an inquiry into the conduct of KMBC in its use of public funds spent on this private site to our detriment and to allow a legitimate 'on site' inspection to take place. This requires the removal of the signage, provision of access in order to allow local residents access to our nearest bus stop on Chiddwall Valley Road and post office on Harbourne Avenue. That means crossing the site which the owner has never objected to since purchased some ten years ago.

We therefore wish to make a legal challenge over the actions taken by KMBC over this issue.

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

I object to the modification because the site of only 86 dwellings proposal is too small to effect the overall PLAN and would destabilise the current Bowring Park Estate ~~design~~ village design, with its very limited ~~point~~ point of access/exit onto Bowring Park Road. The proposal would further 'impact' on the view to Runcom, severely strain the limited infrastructure; of few unsustainable Pinner Avenue shops and ~~not~~ make further demands on medical services and confirmed 'over-subscribed' local primary school. Such a development would further saturate the local highway network making this site undeliverable as a reserve housing location; not to mention the associated <sup>unavoidable</sup> flood risk of the site for dwellings.

Considering all these negative impact considerations of the proposal - Pegasus is selling a dream that cannot be fulfilled and K.M.B.E. should not be complicit in this deception and honour its arguments of greenbelt retention in the U.D.P (2008) Consultation.

Alternative site locations recently identified with the proposed closure of the large Roby Community College on Rupert Road, Roby and the

Continue on a separate sheet if necessary...

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

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

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

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

Signature



Date

22/10/2014

JOHN WEBSTER (JUNIOR) ROBY RESIDENTS ACTION GROUP  
Edenhurst Avenue Sportsfield Site  
Representation Part B 4

two recently named fire stations at Huyton and Utherton, both proposed for closure very recently.

The PLAN should respect the GAP the site provides as recognised in the NPPF preventing urban/suburban sprawl and separating the ancient Domesday town of Childwall and Huyton with Roby from merging.

This site within living memory contained an ancient circle of holly bushes and therefore having considerable historical significance (House Liverpool Museum) with Roby having one of the oldest settlements on Merseyside — the site falls between these two ancient towns and should be respected for what it now is — a green<sup>open</sup> space thriving wildlife priority habitat of natural beauty, much loved and appreciated by residents of Childwall Belle Vale and Huyton with Roby and demands the greenbelt protection from speculators and developers; outlined in our Chief Executive Officers Mrs Sheena Ramsey's new 'green space strategy' document 19/6/14 — to which we expect K.A.B.C. to adhere too in this case and reconsider bringing forward the modification but retaining the site for all the reasons given in the UDP consultation of 2008

Concern at the loss of greenbelt by increasing the residential capacity beyond that intended in the original estate design could result in declining property values, as well as a loss of quality of life.

The PLAN should further respect the value of a clean environment as the site de-contaminates the pollution residents suffer sandwiched between the main railway, Liverpool Manchester line, the M62 TransPennine Motorway and the

JOHN WEBSTER (JUNIOR)

Edenhurst Avenue Sportsfield Site  
Representation Part B 4

the B5080 road to the north of the site and the B5178 Childwall Valley Road to the south of it.

The sportsfield site muffles the noise pollution as well as cleaning the air pollution all of which has contributed to a shorter life expectancy in one of the most deprived boroughs in the United Kingdom. It is therefore vital to preserve and protect this small but vitally important greenbelt sportsfield site.

The site was purchased as a long term speculative 'profit driven venture' - buying into greenbelt land cheaply, repeatedly requesting reclassification from Council, in order to sell on for considerable profit.

It is shameful that K M B C have spent over \$25K+ maintaining the site for the owner and thus aiding them in their profitable venture by now endorsing the sites removal from its greenbelt status. I believe this to be highly questionable action by K M B C that needs answering and again call for a full inquiry into the matter.

# The natural approach to a thriving borough

Thursday 19 June 2014

The National Wildflower Centre  
Court Hey Park  
Huyton



DOCUMENT SUBMISSION

AMPA

We are extremely fortunate to have a wealth of good quality parks and green open space across Knowsley. Every day Knowsley's residents and visitors have fun in our local play areas, stroll through our woodlands, play sports on our recreation grounds, participate in green space activities, grow produce in allotments or study our natural habitats.

Without green and open spaces, life for people living in our borough would be very different. As a Council we want everyone to be able to easily use and enjoy local clean, green and open spaces.

Good green spaces both protect us and provide for us. They can help us tackle health, educational and social inequalities and offer a unique contribution to the creation of vibrant, healthy and prosperous communities.

It is evident that quality green spaces can:

- Promote health and wellbeing
- Set the scene for economic growth
- Provide social value
- Improve educational attainment, motivation and behaviour
- Mitigate against and adapt to climate change
- Reduce crime and anti social behaviour
- Enhance natural assets and biodiversity

To maximise these many benefits we want to work collaboratively with local people, our communities and partners. From community actions to partnership projects, it is clear that the people of Knowsley and our partners will be central to delivering the ambitions of our new Green Space Strategy.

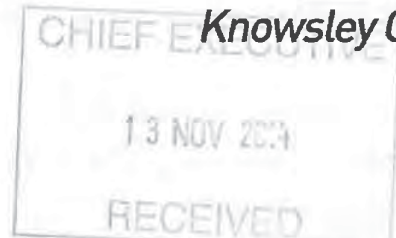
Sheena Ramsey,  
Chief Executive,  
Knowsley Council





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

### RETURNING THIS FORM

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

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

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

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

#### PART A – PERSONAL DETAILS

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

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation JOHN WEBSTER (SENIOR)

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

EDENHURST AVE GREEN SPACE SPORTSFIELD SITE

Modification Ref M168 Policy Ref  Paragraph Ref

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

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

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

REJECTION OF MODIFICATION

COUNCIL NOT CONSULTED WIDELY ENOUGH. THE CONSULTATION WAS EXTENDED ONLY 200MTRS FROM THE SITE WITH COUNCIL LETTER DROP, MEANING 80% OF THE BOWLING PARK ESTATE ARE IGNORANT OF IT!! THEREFORE IT IS NOT A LEGALLY COMPLIANT CONSULTATION.

~~RE~~ MORE OVER THE SITE NOTICES ARE NOT SEEN BY VEHICLE USERS AS THE ENTRANCE/EXIT TO THE ESTATE IS TO THE NORTH – IN THE OPPOSITE DIRECTION TOWARDS THE M62 MOTORWAY AND BOWLING PARK ROAD.

NO PUBLIC MEETINGS HAVE BEEN ARRANGED BY OUR ONE PARTY TOTALITARIAN COUNCIL AND JUST AS MEMBERS DID NOT ATTEND THE PUBLIC HEARINGS TO DEFEND RESIDENTS INTERESTS NEITHER DID THEY ATTEND THE ONE 'LOCAL DROP IN' EVENT IN COURT KEY PARK WHICH WAS ARRANGED NOT AS A Q AND A FORUM BUT AS A FREE FOR ALL PUZZLEMENT.

WE HAVE EXPRESSED OUR VIEWS IN UNANIMITY IN THE 2006 U.D.P. CONSULTATION AND OVER THE YEARS REPEATEDLY. WE ~~REPEATEDLY~~ RELY ON THE INTEGRITY OF OFFICERS AND MEMBERS TO ENDORSE OUR WISHES RESULTING IN THE 2006 U.D.P. NOT BEING COUNTERMANDED.

Continue on a separate sheet if necessary...

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

I OBJECT TO THE MODIFICATION BECAUSE IT IS NOT CONSISTENT WITH NATIONAL POLICY AS EXPRESSED BY LOCAL COMMUNITIES SECRETARY OF STATE MR PICKLES 4/10/14 DAILY TELEGRAPH IN HIS NEW PLANNING GUIDELINES 'PROTECTING OUR GREENBELT MUST BE PARAMOUNT' AND 'THAT GREENBELT BOUNDARIES SHOULD ONLY BE ALTERED IN EXCEPTIONAL CIRCUMSTANCES'. THIS CLARITY OF ENLIGHTENED GOVERNMENT POLICY MEANS A REVIEW OF OUR SMALL SPORTSFIELD SITE IS THEREFORE VERY NECESSARY, AS THE PLAN CAN BE MADE TO WORK WITHOUT ITS INCLUSION AND RESULTANT NEGATIVE IMPACT ON THE COMMUNITY AND LOCALITY

QUOTE N.P.P.F. SECTION 9 THE CONSTRUCTION OF NEW BUILDING ON GREEN BELT LAND IS CONSIDERED 'IN APPROPRIATE' AS IT WOULD SEAL THE GAP BY ENCOURAGING URBAN/SUBURBAN RESIDENTIAL SPRAWL BETWEEN THE ANCIENT DOOMS DAY TOWNS OF CHILDWALL AND HUXTON WITH ROBY.

I WANT THE IMPORTANT NEW GREEN SPACE STRATEGY OF K.M.B.C 14/6/14 TO BE IMPLEMENTED IN PROTECTING THIS PRIORITY HABITAT OF NATURAL ENVIRONMENTAL VALUE (RECOGNISED AS AN IMPORTANT LOCAL COMMUNITY AMENITY AND 'THUS RETAINED IN GREENBELT FOR FUTURE GENERATIONS TO ENJOY'.  
Continue on a separate sheet if necessary...

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

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

- a) No, I do not want to participate at any further public hearing   
*DUE TO MY PHYSICAL CONDITION AND AGE.*
- b) Yes, I wish to participate at any further public hearing

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

Signature



Date

5/11/14



Knowsley Council

# Knowsley Plan: Strategy

## Local Core



Knowsley Council

## Proposed Modifications - Consultation Representations Form

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- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

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

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

#### PART A – PERSONAL DETAILS

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

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

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation                      J A Parker

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

Modification Ref    M088                      Policy Ref KGBS 17                      Paragraph Ref 5.46A

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

Yes                      No

a) Legally Compliant? (see guidance note 2.2)

b)      Sound? (see guidance note 2.3)

✓

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

SA

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

#### Table 5.3 SWOT Analysis

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

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

Logistics centre.

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

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

Notably;

ONS area of Indices of Multiple Deprivation

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

Childrens services in special measures

Low attainment levels in Knowsley schools

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

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

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

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

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

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

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

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

Signature



Date 14/11/2014



Huyton Ln

Kings Dr

Dunsin Way

457

457

A

**TOWN AND COUNTRY PLANNING ACT 1990**

**SITE ADDRESS:** 16-21 Lion Court, Kings Drive, Kings Business Park, Prescot, Knowsley. L34 1EN

**DESCRIPTION OF DEVELOPMENT:** APPLICATION TO VARY CONDITION NO'S. 8 & 9 ATTACHED TO PLANNING PERMISSION 07/00746/FUL (ERECTION OF 6 NO. TWO STOREY OFFICES WITH ASSOCIATED CAR PARKING AND LANDSCAPING) TO ALLOW FOR DETAILS RELATING TO THE EMERGENCY ACCESS FACILITY & PEDESTRIAN ACCESS TO HUJYTON LANE TO BE SUBMITTED PRIOR TO THE COMPLETION OF UNITS 17-21 AND NOT ON COMMENCEMENT OF DEVELOPMENT (UNIT 16 CONSTRUCTED ONLY, 17-21 NOT COMMENCED TO DATE).

**APPLICATION REFERENCE:** 13/00283/FUL

**APPELLANT'S NAME:** Commercial Development Projects Ltd

**APPEAL REFERENCE:** A case heard by the High Court on 23/07/2013

**APPEAL START DATE:** 31 July 2013



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

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

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

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

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

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

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

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

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

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

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

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

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

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

## New Deal for Communities

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

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

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

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

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

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

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



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

Oct 05, 2014 08:00

By [REDACTED]

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



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Improv



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

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

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

## **Improvement Notice**

---

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

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

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

### **Understanding needs of children, young people and families**

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

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

### **Leadership, Management and Governance**

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

### **Early Help and Partnership Working**

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

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

### **Quality and effectiveness of Practice**

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

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

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

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

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

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

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

**10. Improve the timeliness of adoptions by ensuring that:**

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

**Quality assurance, audit and management oversight**

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

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

**12. Establish effective supervision and management oversight by**

ensuring that:

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

### **Staff capability and capacity**

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

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

### **Local Safeguarding Children's Board (LSCB)**

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

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



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

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

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

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

**Improvement against the above measures will be assessed as follows:**

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

independent testing and validation of improvements.

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

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

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

Signed on behalf of the Secretary of State



.....

Dated : 16 September 2014



# **North Huyton Action Area Supplementary Planning Document**

Knowsley Metropolitan Borough Council

February 2007

**(Copy of Document PP05 provided)**



20<sup>th</sup> October 2014

**Objection to "Release of Land from the Green Belt" (Local Plan)**

Dear Sir/Madam,

Further to your mailing dated 19<sup>th</sup> September 2014 Ref: Local Plan I am writing to you in the hope that you may be able to help save some important Green Belt land that is under imminent threat in my local area. Prescot as you know is an historic market town that is 'framed' from the western approach by an oasis of green space. If travelling out of Liverpool on the main A57 it is in fact the first green space for 8 miles! The land in question borders the A57, A58 and Knowsley Park Lane, postcode L34, and is currently owned by Beesley & Fildes. There is also a similar threat to nearby farmland between Knowsley Lane and the M57. Both of these sites border the Earl of Derby's estate, whilst the first site also borders an established 'conservation area'. **These green sites form a natural boundary between the outer Liverpool housing estates and the medieval town of Prescot and preserve the setting and special character of this historic town on the hill. Any development on these sites would only serve to further merge these two distinctly different settlements closer together.** An additional nearby stretch of Green Belt between Carr Lane and the M57 in Prescot (postcode L34) is also under imminent threat, this being an area containing many wild plants and a haven for some local wildlife.

Collectively these three above named areas are invaluable green spaces supporting a variety of flora and fauna and farm animals. They are an inherent part of the town and its surroundings, affording most welcome and aesthetically pleasing views.

Whilst your above letter states that previous public consultations have taken place the vast majority of local people I have spoken to have not heard anything about these proposals until very recently, and even now only a limited number of people have received your written notifications dated 19<sup>th</sup> September. Moreover, with regard to the first named site (bordering A57, A58, Knowsley Park Lane) there do not appear to be any visible public notices on display for the entire stretch of the main road perimeters. In addition I personally have had difficulty obtaining Representations Forms from my local library. Indeed contrary to KMBC documentation it is strongly believed that this Local Plan has **not** been "prepared with the participation of the greater local community".

It is claimed that the proposed removal of this Green Belt is in order "to meet the Borough's long term needs for new homes and jobs". **However, Prescot and its surrounding area has in recent times already seen extensive house building programmes, some of which are still ongoing, together with the creation of new business and retail parks. Moreover, the town and its surroundings still have plenty of available brownfield sites.** With this in mind it is believed that this Local Plan not justified.

Reference to the Government's 'National Planning Policy Framework' Document on Protecting Green Belt Land Section 9.80 states 'Five Purposes of Green Belt'. If the above developments proceed all five points would I believe be contravened. These plans are clearly extremely harmful to the Green Belt and are contrary to further points laid out in the 'National Planning Policy

Framework' document such as Sections 9.87 and 9.88. In summary these proposals do not appear to be consistent with the National Planning Policy.

Whilst these Green Belt areas may perhaps look on a map to be relatively small contiguous areas of the surrounding residential space **the reality on the ground is that they are such important, rare and attractive oases of green space, fresh air and relative beauty. If developed they will of course be gone forever. The locations immediately beyond these green belt sites would also be compromised in terms of quality of life, views and open space, excess traffic and congestion on already busy roads, further diminution of air quality, further noise pollution, further light pollution, etc.**

If the use of e.g. the site bordering A57/A58/Knowsley Park Lane *were* to change then a far more worthwhile initiative would be to turn it into prime agricultural land: at a time when it is generally accepted that this country is not sufficiently meeting its food production needs, this would also echo and support the views of current Secretary of the Environment Liz Truss.

On behalf of the local community I would be extremely grateful if you could perhaps consider this case and help safeguard the treasured local Green Belt that makes our neighbourhood unique.

Yours sincerely,

A solid black rectangular box redacting the signature of Mr K Brown.

Mr K Brown.



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



### RETURNING THIS FORM


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

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

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

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

### PART A – PERSONAL DETAILS

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

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

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

**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

Mr K Brown

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

**3 Green Belt Sites: A57/A58/Knowsley Park Lane, postcode L34 (Beesley & Fildes site); farmland between Knowsley Lane and M57 postcode L34; land between Carr Lane and M57 Prescot postcode L34**

Modification Ref

Policy Ref

Paragraph Ref

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

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

Main document refs (though many other refs involved): Doc CS08c: M168; M161; M157

It is widely regarded amongst local people that this Plan has not been prepared with the participation of the greater local community – the vast majority of local residents had not heard of these proposals until recently (September 2014). Only a limited number of people have received written notifications; there appear to be hardly any visible notices on display for the entire stretch of the main road perimeters for the A57/A58/Knowsley Park Lane site; it has been reported that there has been difficulty obtaining Representation Forms from the local library/One Stop Shop. (all contrary to Statement of Community Involvement report)

The Plan does not appear to show how Knowsley Council has arrived at the choice of the above three stated Green Belt sites, when in particular **there are so many brownfield sites extant in the surrounding area, together with the fact that an extensive and ongoing house building programme has been and is underway in the area, together with the creation and development of extensive business and retail sites in the area.** (contrary to Sustainability Appraisal report)

Continued on separate attached sheet

## **Representations Form – Continuation Sheet for Mr K Brown**

### **Knowsley Local Plan: Core Strategy - Proposed Modifications – Consultation**

#### **Section 3 continued**

The first two named green belt sites (A57/A58/Knowsley Park Lane and farmland between Knowsley Lane/M57 postcode L34) form a natural boundary between the sprawling outer Liverpool housing estates and the historic Lancashire market town of Prescot which sits on a small hill. Any development on these sites would only serve to merge these two distinctly different settlements closer together. (contrary to National Planning Policy Framework document, Town and Country Planning Regulations)

**All three named green sites variously support a variety of flora and fauna and farm animals.** They are an inherent part of the town and its surroundings, affording most welcome and aesthetically pleasing views. Whilst these Green Belt areas may perhaps look on a map to be relatively small contiguous areas of the surrounding residential space the reality on the ground is that they are such important, rare and attractive oases of green space, fresh air and relative beauty. **The locations immediately beyond these Green Belt sites would also be compromised in terms of quality of life, views and open space, excess traffic and congestion on already busy roads, further diminution of air quality, further noise pollution, further light pollution, etc.** (contrary to National Planning Policy Framework document, Town and Country Planning Regulations, Sustainability Appraisal report)

**Summary: for the reasons outlined in this section it is believed that this Plan is not justified, is not consistent with national policy, is not effective and is not positively prepared.**

Attached are names and addresses of supporters of this Representation.  
**N.B.** this list represents only a small cross section of supporters as time was not available to canvas further.

Mr K Brown





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

Full use should be made of available local brownfield sites (of which there are many) before any green belt land is offered. Consideration should also be made of the already extensive house building, business and retail developments that have already taken place and are ongoing in the local area.

If the use of e.g. the site bordering A57/A58/Knowsley Park Lane were to change then a far more worthwhile initiative would be to turn it into prime agricultural land: at a time when it is generally accepted that this country is not sufficiently meeting its food production needs, this would also echo and support the views of current Secretary of the Environment Liz Truss.

Particular attention should be paid in this case to the Government's recently (October 2014) published Guidance to Reinforce Green Belt Protection e.g. "Established green belt boundaries should only be altered in exceptional circumstances under **updated** guidance published by the Department for Communities and Local Government (ref updates to the Planning Practice Guidance document).

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

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

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

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

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

Signature



Date

9/11/14

Name

Address

Jeffrey D Engel (Rev)

Illus

Amanda Fearn

STELLA RUDEN

PHIL RUDEN

KAREN MCCORMACK

IAN MCCARTHY

BRENDA BURGESS

Catherine

Kwasnicki

Andrew

Kwasnicki

RAY INWOOD

CAROLINE INWOOD

Lauri Moran

James Millican

Miss M. Austin

J.H. Auto

Name

Address

A. E. SHERLOCK  
DAVID CARNBY  
A. GREEN  
V. GREEN.  
G. TOWN  
C. TOWN  
J. MURRAY  
M. M'EGAN.  
RICHARDS WOODS  
MICHAEL COCKLAN  
DAVID CALLAN  
L. CONROY  
R. TAYLOR  
C. HANSON.  
A. MOODY  
M. BLACK  
E. BLACK  
A. PRESCOTT  
P. Prescott  
L. GREGORY  
R. ASHCROFT  
J. BRECK  
R. DEUBLIN  
K. FONES  
D. O'NEILL  
G. ROBERTS

Name

Address

STE OAKES

C SALMON ✕



MICHAEL GLENK



IRENE GLENN

I Joann





19<sup>th</sup> October 2014

**Appeal to help save our local Green Belt**

Dear Mr Howarth,

I am writing to you directly in the hope that you may be able to help save some important Green Belt land that is under imminent threat in my local area. Prescot as you know is an historic market town that is 'framed' from the western approach by an oasis of green space. If travelling out of Liverpool on the main A57 it is in fact the first green space for 8 miles! The land in question borders the A57, A58 and Knowsley Park Lane, postcode L34, and is currently owned by Beesley & Fildes. There is also a similar threat to nearby farmland between Knowsley Lane and the M57. Both of these sites border the Earl of Derby's estate, whilst the first site also borders an established 'conservation area'. **These green sites form a natural boundary between the outer Liverpool housing estates and the medieval town of Prescot and preserve the setting and special character of this historic town on the hill. Any development on these sites would only serve to further merge these two distinctly different settlements closer together.** An additional nearby stretch of Green Belt between Carr Lane and the M57 in Prescot (postcode L34) is also under imminent threat, this being a relatively small area containing many wild plants and a haven for some local wildlife. Knowsley Council claim to promote wildlife areas and biodiversity (e.g. Eaton Street Park, Prescot is a good example) yet this latter location has become a truly natural site in its own right which is now threatened! Collectively these three above named areas are invaluable green spaces supporting a variety of flora and fauna and farm animals. They are an inherent part of the town and its surroundings, affording most welcome and aesthetically pleasing views.

As I'm sure you are aware Knowsley Metropolitan Borough Council has recently identified these sites to a Government Planning Inspector for "Release from the Green Belt" (sic). A deadline of 14<sup>th</sup> November 2014 has been announced for final representations. Whilst the council state that previous public consultations have taken place the vast majority of local people I have spoken to have not heard anything about these proposals until very recently, and even now only a limited number of people have received written notifications (dated 19<sup>th</sup> September). Indeed contrary to KMBC documentation it is strongly believed that this Local Plan has **not** been "prepared with the participation of the greater local community". Moreover, with regard to the first named site (bordering A57, A58, Knowsley Park Lane) there do not appear to be any visible public notices on display for the entire stretch of the main road perimeters.

Knowsley Council claims that the proposed removal of this Green Belt is in order "to meet the Borough's long term needs for new homes and jobs". **However, Prescot and its surrounding area has in recent times already seen extensive house building programmes, some of which are still ongoing, together with the creation of new business and retail parks. Moreover, the town and its surroundings still have plenty of available brownfield sites.** With this in mind it is believed that this Local Plan not justified.

Reference to the Government's 'National Planning Policy Framework' Document on Protecting Green Belt Land Section 9.80 states 'Five Purposes of Green Belt'. If the above developments proceed all five points would I believe be contravened. These plans are clearly extremely harmful to the Green Belt and are contrary to further points laid out in the 'National Planning Policy Framework' document such as Sections 9.87 and 9.88. In summary these proposals do not appear to be consistent with the National Planning Policy.

Whilst these Green Belt areas may perhaps look on a map to be relatively small contiguous areas of the surrounding residential space the reality on the ground is that they are such important, rare and attractive oases of green space, fresh air and relative beauty. If developed they will of course be gone forever. The locations immediately beyond these green belt sites would also be compromised in terms of quality of life, views and open space, excess traffic and congestion on already busy roads, further diminution of air quality, further noise pollution, further light pollution, etc.

If the use of e.g. the site bordering A57/A58/Knowsley Park Lane were to change then a far more worthwhile initiative would be to turn it into prime agricultural land: at a time when it is generally accepted that this country is not sufficiently meeting its food production needs, this would also echo and support the views of current Secretary of the Environment Liz Truss.

On behalf of the local community I would be extremely grateful if you could perhaps consider this case and help safeguard the treasured local Green Belt that makes our neighbourhood unique.

Yours sincerely,



Mr K Brown.



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

**RETURNING THIS FORM**

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

- > By email: [LocalPlan@knowslev.gov.uk](mailto:LocalPlan@knowslev.gov.uk)
- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annex, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

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

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

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	KAREN HICKEL	Middleton Solicitors
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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

PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a) It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative



Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

See Comment A. We were never ever told of any changes  
this must constitute an illegality somewhere in our law.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature...



Date...12th...November 2014



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

Knowsley Council



## RETURNING THIS FORM

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- > By email: [LocalPlan@knowslev.gov.uk](mailto:LocalPlan@knowslev.gov.uk)
- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annex, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

## PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	KATHY ILLIOTT	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref  Policy Ref  Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

- a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.
- b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KBGS 6 should remain in Green Belt.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I HAVE LIVED ~~HERE~~ I WAS BORN WHICH WAS ACTUALLY IN DON BUNGALOWS <sup>HERE SINCE</sup> ON THE OLD ESTATE. I REMEMBER WATCHING THE VERY FIRST FAMILY BEING GIVEN THE KEY TO THEIR BRAND NEW HOUSE, IN HOME FARM ROAD. LOTS OF PEOPLE FROM THE BUNGALOWS GATHERED TO WATCH, ALL LOOKING FORWARD TO THE PROSPECT OF KNOWING THAT THEY WOULD ALL ONE DAY DO THE SAME. I CAN STILL REMEMBER HOW EXCITED MY MOTHER WAS WHEN SHE OPENED THE LETTER TELLING HER OUR NEW HOUSE WAS READY. ONCE KNOWN AS KNOWSLEY, EVENTUALLY CHANGED TO KNOWSLEY VILLAGE, I REPEAT VILLAGE. IF THIS DEVELOPMENT IS EVER BUILT IT WILL NO LONGER EXIST AS SUCH, BUT JUST BECOME ANOTHER LARGE HOUSING ESTATE. NOT TO MENTION THE YEARS OF DISRUPTION AND MESS TO RESIDENTS, AND DELAYS TO TRAFFIC ON KNOWSLEY LANE, AS THIS IS THE ONE AND ONLY WAY OF GETTING INTO THE VILLAGE. OVER THE YEARS THERE HAVE BEEN MANY PROBLEMS WITH DRAINS, THE SEWAGE SYSTEM COULD NOT COPE, CAUSING EVEN MORE FLOODS AND OUB FLOWS. THE VILLAGE WAS ONLY BUILT ORIGINALLY TO ACCOMMODATE AND SERVE 500 HUNDRED FAMILYS. I KNOW THIS AS I WAS ONLY 15 YEARS OF AGE WHEN WE MOVED. ~~WAS BORN~~

Continue on a separate sheet if necessary...

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Signature...  .....

Date... 12 ..... November 2014



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR C & MRS K	
Name	BROWN	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	[REDACTED]	

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

SUE 1

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### **3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

It is considered the plan is not legally compliant because the level of consultation is insufficient. The nature of change is so extensive that all the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Governments commitment to deliver real local democracy through the localism agenda.

Our property is located on the site "East of Knowsley Ind & Bus Parks" designated as a primary use of "Employment". We are one of 3 residential properties on the Knowsley Village side of the A580 and to remove this section of land from the greenbelt for employment use would significantly affect us.

We would suffer from loss of privacy as the land is adjacent to our back garden, loss of outlook, increased noise pollution, increased traffic congestion resulting in difficulties entering and exiting our property onto Knowsley Lane (there is already a high level of lorries using Knowsley Lane to enter Knowsley Business Park).

We believe there would be an adverse impact on nature, our garden and the land surrounding it is home to a wide variety of birds, bats, stoats, badgers and more recently the pink footed goose have landed in the fields opposite where they usually rest during their migration period.

Being a resident of Knowsley Village we believe if we were to lose all of the above as a result of proposed employment development this would alter the quality of life we enjoy at present living in a semi-rural location and would detract from the value of the property.

We plan to oppose any future planning applications should the land be released from Greenbelt based on the above grounds as well as the fact there is an abundance of empty retail premises on Knowsley Business & Ind Parks that could be utilised for estimated future employment needs.



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

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**Signature** Mr Craig Brown & Mrs Kay Brown **Date** 12-11-14

---

Keith Kennedy



14<sup>th</sup> November 2014

Local Plan Team,  
Knowles Council,  
1st Floor Annexed,  
Municipal Buildings,  
Archway Road, Huston, L36 9YU.

Dear Martin Pike

Re KNOWSLEY LOCAL PLAN-PUBLIC CONSULTATION – HALEWOOD EAST

**NOTE 1 - request for a review of the Local Plan because of the following issues:**

(A) There is currently new evidence/guidance/best practice that was previously not available to the hearings or consultations of the Local Plan:

i. DEFRA - March 2014 Defra release Category 4 Screening Levels (C4SLs) as part of the growth agenda by removing excessive cost burdens for housing developers. 3 years ago Defra promised that £132m in savings will come about as a result of the reforms to the statutory guidance on contaminated land. Those reforms, says the report, “will avoid costly unnecessary remediation operations and focus attention on high risk sites, potentially saving business an estimated £132m a year”. Therefore, brownfield sites that were previously

discounted by the Inspector due to slow release should be released more swiftly. Knowsley Council should now encourage the release of brownfield sites as a result, March 2014.

- ii. DCLG - New rules further strengthen green belt protections 16/10/14.
- iii. Eric Pickles - Councils must protect our precious green belt land 06/10/14, and It is now easier to bring vacant and underused public land back into use through the Community Right to Reclaim Land 24/10/14.
- iv. Brandon Lewis - Development on the Green Belt 11/08/14.
- v. DCLG – Consultation on proposed changes to planning policy and guidance, ensuring fairness in the planning system, and strengthening protection of the green belt and countryside 14/09/14.
- vi. DCLG - Brownfield sites to be prioritised for development 28/10/14.
- vii. DCLG - Since January 2014 a new Right to Contest has enabled the public to challenge the government about land and property they feel could be put to better use, and ask for it to be sold 08/01/14, Government initiatives to help build more new homes on brownfield land 13/06/14, £5 million fund will unlock 100 brownfield sites for new homes 07/08/14, Bidding opens for £200 million to build homes on brownfield land 13/08/14, The government has announced plans to create 30 housing zones on brownfield sites across the country to increase housing supply 22/10/14.
- viii. Land held by Homes and Communities Agency (HCA) and other major land holding departments has been sold with capacity for over 76,000 homes 31/03/14.
- ix. CPRE – Green belt development is “not the path to economic growth 27/08/12.
- x. Nick Boles MP - inspectors in Local Plan examinations should continue to determine whether local planning authorities have followed NPPF in seeking to meet the objectively assessed development needs of their area 18/03/14.
- xi. Nick Boles MP – shortfall in housing does not constitute “exceptional circumstances” 18/03/14).
- xii. The Guardian (Simon Jenkins) – “Housing crisis? No, just a very British sickness” states that building on green belt "wastes energy and infrastructure, it promotes commuting and destroys a dwindling environment. Housing "need" is in cities, where labour mobility and immigration are high and most poor people find work". Knowsley Council doesn't need to build more houses; this "need" is based on crude household formation, with no reference to

demand, price, migration or anything else. Danny Dorling (Professor/author) concludes, "We cannot build our way out of the disaster of our current housing system." We should rather tackle "how to better share and look after what we have already got" 21/05/14.

xiii. Letter from the Leader of the Council, Councillor R.J.Round, about financial strains on the Borough due to the Local Plan, October 2014.

(B) Additionally, there should be a review as there are currently numerous new community groups that were not previously involved in the consultation.

**NOTE 2 – additional reasons for objection to Local Plan**

(A) Knowsley Council should adhere to its own "Statement of Community Involvement" document. Section 4.6 "community involvement that is more than a box ticking exercise will require an ongoing commitment". Table 5.1. "respecting peoples involvement". Table 6.1. "potential measures to engage hard to reach groups".

Hence the LOCAL PLAN is unsound on the basis of the failure of the Council to carry out adequate consultation with the wider public. In particular the policies outlined Doc CS08c M049-65 Policy Ref CS1-CS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: p51: M168 (Doc CS08c: P51) new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC. The Council should therefore consider re-convening the public consultation process to take note of the views of local residents and the numerous new community groups (NOTE 1, (B) above).

(B) Knowsley Council should adhere to its own policy document "Policy G1: Development within the GreenBelt"

(C) The approach to development in East of Halewood (Policy SUE2b) is not appropriate.

(D) It is also noted that NATIONAL PLANNING POLICY FRAMEWORK (NPPF) requires that GREEN BELT BOUNDARIES once set should be permanent.

(E) With reference to NOTE 1 (A)(vi) (above) priority for development should favour the use of BROWN FIELD SITES. There are figures which suggest that there are significant numbers of unoccupied properties, (2020 properties figures for 2012, Knowsley Local Plan Monitoring Report: para 3.65 p32, and a potential for 5636 dwelling sites available) which together with a view that the housing targets are ambitious rather than realistic, would mean that the housing

target of 8100 could, (2020+5636=7656) be achieved without utilising the GREEN BELT. In addition in the SHLAA Report of 2012: para 8.3, p 30) there is reference to the Borough having 12.6 years of capacity rather than 15 years. It must be a possibility that as the 12.6 years approach the situation regarding available brownfield land may have changed, and/or assess migration/population increase. In this context relating to housing there is no reference to any consultation with any local housing trusts. The other concern relating to the release of land from the GREEN BELT is that development on these sites will be more attractive to developers, (not to mention the capital appreciation of the value of the land following change from GREEN BELT status), so there is thus a real risk that brown field sites will not be developed, and may remain as blighted sites in the Borough, as former GREEN BELT sites are developed preferentially. GREEN BELT land once released and developed is lost forever. Hence the GREEN BELT should be protected as recommended recently by the Secretary of State, ERIC PICKLES, whose views on the use of GREEN BELT land (NOTE 1 (A)(iii) (above) include: "incursions into the GREEN BELT must only occur in exceptional circumstances and must be planned in a logical and strategic way". In Document Hearing Statement 5A from October 2013 there is also reference in para 5.1 to "exceptional circumstances" (NOTE 1 (A) (xi) shortfall in housing does not constitute exceptional circumstances) relating to GREEN BELT and in 5.1.1 the policy is amended to "Inappropriate development will not be permitted in the GREEN BELT unless very special circumstances can be demonstrated, and the visual and recreational amenities of the GREEN BELT will be preserved".

(G) In Policy CS8 (CS09a: para 1&2: p 69) there is reference, for example, to ensuring more attractive and cleaner neighbourhoods, sustaining and promoting biodiversity, preserving the character and function of historic environments and valued landscapes, to provide local opportunities for sport, mitigating the effects of climate change and flood risk, mitigating air, water and noise pollution to protect and enhance strategically important areas of green space, promote effective movement of wildlife through a network of green strategic links. In para 4e (p70) there is reference to the M57 Green Belt corridor as a strategically green link.

Developing on the GREEN BELT will counter to these aims.

Hale wood East is part of this corridor and prevents unrestricted sprawl, prevent merging of neighbouring towns, assist in safeguarding the countryside from encroachment, and preserves

the setting and special character of Halewood. Halewood has historic character and noted in the Domesday Book 1086. Development of the site would therefore be inherently encroaching and harmful to the landscape character.

Please NOTE 1 (A)(iii), the COUNCIL should be minded of the Secretary of State, ERIC PICKLES' views on the use of GREEN BELT land : "incursions into the GREEN BELT must only occur in exceptional circumstances and must be planned in a logical and strategic way". In the context of this statement Mr. Pickles stated that the area in question: BLACKMORE "was an almost unique Essex village of a type that was rapidly disappearing, it unusually retained its medieval road patterns and is nationally renowned for its fine church and its Tudor links. Any development should be sympathetic to the heritage of BLACKMORE". Much of this could be applied to Halewood, which has a long history, development on the site would be detrimental to its visual amenity.

Please NOTE 1 (A)(iv), Planning Minister BRANDON LEWIS is quoted as stating that "We have put Local Plans at the heart of the reformed planning system so councils and LOCAL PEOPLE can now decide where development should and shouldn't go". Hence the COUNCIL should be heeding this latest GOVERNMENT GUIDANCE and taking note of what THE PEOPLE want in terms of GREEN BELT, i.e. that the GREEN BELT should not be sacrificed. Exceptional circumstances do not therefore exist to justify removing land from the GREEN BELT. It is also worthy of note that in a document from the LANDSCAPE INSTITUTION, entitled "PROFITABLE PLACES", there is a chapter heading: "Investment in a high quality landscape pays dividends as customers are willing to pay more for it". It is likely preparation of brownfield sites may be expensive to develop. Hence there is thus the risk that developers will seek to preferentially develop in released GREEN BELT, thus leaving unused brownfield sites still abandoned and unused. The Council should take note that MOLE VALLEY COUNCIL are considering abandoning their "Housing and Traveller Sites Plan REKS20131405C-015" in the light of this new guidance.

(H) In any general consideration of the GREEN BELT, the Council should also be aware of the NATURE AND WELLBEING ACT, which is a piece of legislation to bring about the recovery of

nature in a generation for the benefit of people and wildlife. Reducing the GREEN BELT runs counter to the aims of this Act. There would be additional concern over the effect of removing the sites from the GREEN BELT on traffic, which is likely to increase and thus contribute to affecting adversely the air quality, through gas and particulate emissions, and there would also be a contribution to an increase in CO<sub>2</sub> (i.e. climate change) from the loss of greenery.

(l) Additional to the above, **suitable sites for future residents should not exasperate pre-existing health conditions of current residents.** Increase in subsequent traffic movements/stop and start on small roads with junctions due to any proposed development will contribute to an increase in air pollution and noise pollution. Deaths in Knowsley from respiratory disease and hospital admissions are significantly higher than national and North West rates. Hospital admission rates for asthma have increased by 37% in Knowsley, since 1999/2001 compared with 11% in the North West and 6% in England. And noise pollution, which contributes to increase in poor mental health due to lack of sleep and other subsequent health implications. It is estimated that 12,250 people in the Knowsley experience depression and anxiety each year. Cardiovascular disease is the biggest killer in Knowsley. Deaths from cardiovascular disease are significantly higher in Knowsley in comparison to figures for England (22% higher than the national average). Lung cancer is the single largest cause of cancer deaths in Knowsley. Figures show that during 2004 / 2006, deaths from lung cancer in Knowsley were 81% above that nationally. South Kirkby has significantly more lung cancer deaths compared to the rest of the Borough.

Knowsley should utilise the recommendations from the Joint Strategic Needs Assessment (JSNA) describing the future health, care, wellbeing needs of local communities. Subsequently the Borough is noted as targeting reducing CO<sub>2</sub> emissions by 18% by 2020 against a 2008 baseline. And target reduction of carbon emissions from estate and services by 41% by 2016 against a 2009/10 baseline. **How is this to be achieved with the increase in traffic and energy use from an additional 8100 homes?**

Knowsley should adopt a strategic approach to planning that takes into account other key frameworks and plans – including Health and Wellbeing.

(J) The hedges provide an environment for birds, small mammals have been seen on the site, and bats are also seen and may be roosting in buildings either on the site or close to it. It is noted that KNOWSLEY claims according to items in a display cabinet in the HUYTON ONE STOP SHOP, to be Britain's GREENEST BOROUGH and in addition has 16 GREEN FLAG PARKS. There is also the KNOWSLEY GREEN SPACE STRATEGY, which discusses the benefits of green space especially chapter 5 and paras 6.3a and 7.2.

(K) Please NOTE 1 (A) (xii) in addition there must be concern that if there are any legal proceedings following the LOCAL PLAN, this could produce further financial strains on the Borough, which has to find £34m in savings (letter from the Leader of the Council, Councillor R.J.Round: October 2014)

(L) The DCLG published the NPPF along with the Localism Act, this was intended to give communities a greater say on planning and policy and scrap "top – down targets". The Localism Act allows for the abolition of Regional Spatial Strategies which seek to bulldoze the GREENBELT around our towns and cities across the country.

(M) Final remark about the sites presented in the Knowsley Local Plan as GREENBELT SITES. This will be a deceiving to developers who will purchase the land expecting a greater return than purchasing a brownfield site. Many of the sites presented within the Local Plan are located on or within 250m of a landfill site. Therefore, Knowsley Planning will expect developers to undertake ground gas monitoring and mitigation measures (gas protection membranes) (Knowsley Policy ENV6:Landfill Gas/ Knowsley Policy ENV5: Contaminated Land). Additionally, several of the sites presented in the Local Plan are on Environment Agency flood risk area Level 1 and Environment Agency have advised if houses were built on these areas they would go to Level 2/3.

(N) I wish to indicate that I would wish to have the opportunity to participate in in any Public Hearing.

Please acknowledge receipt of this document.

Regards Keith Kennedy



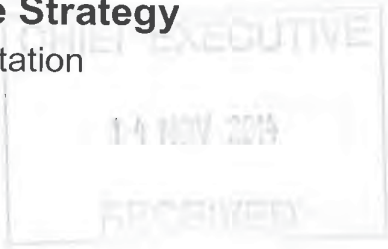




Knowsley Council

# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



## RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- > By email: [LocalPlan@knowslev.gov.uk](mailto:LocalPlan@knowslev.gov.uk)
- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annex, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

## PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	Solicitor
Name	KEITH PATERSON	Middleton Solicitors
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref  Policy Ref  Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) <i>??</i>  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

\* 3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

- a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.
- b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop **1093 dwellings** on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt **unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now.** In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

??

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I STRONGLY OBJECT TO THE PROPOSED MODIFICATIONS IN THE RELEASE OF GREEN BELT, WHICH WOULD SERIOUSLY JEOPARDISE THE CHARACTER OF KNOWSLEY VILLAGE AND ITS INFRASTRUCTURE. I FULLY ENDORSE ALL THE OBJECTIONS SUBMITTED BY THE SAYE KNOWSLEY VILLAGE GREEN BELT GROUP.

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date.....12th.....November 2014

Local Plan Team, Knowsley MBC,  
1<sup>st</sup> Floor Annex, Municipal Buildings,  
Archway Road, Liverpool, M36 9YU.

Dated: Thursday 13<sup>th</sup> November 2014

**Green Belt Modifications at Knowsley Village Reference KGBS 6**

Dear Sir / Madam,

I am writing regarding the Green Belt modification at Knowsley Village reference KGBS 6 in the local plan for 2014. I believe the planned changes are irresponsible, are based on a planning horizon that is too long to avoid risk and deliver certainty, will destroy the character of Knowsley Village and compromise the Knowsley Village Conservation Area.

I challenge the modification on the following **material** grounds:

- **Existing policy:** the modification contradicts local, strategic and national planning policies;
- **Highway issues:** Knowsley Lane cannot accommodate the volume of traffic that will be generated by extended development generating adverse community and economic impact;
- **Capacity of physical infrastructure:** the introduction of over 50% more dwellings would impose disruption by demanding that existing infrastructure is renewed AND cause issues in the drainage at Knowsley Village which is already problematic;
- **Nature conservation:** there will be significant negative impacts on the Conversation Area;
- **Unacceptable pollution:** aspects of Knowsley Village are high polluted, adding c1,000 homes and cars will exacerbate this issue with the potential to cause healthcare problems.

And the following **non-material** grounds:

- **Problems arising from the construction period:** a protracted development period will subject existing residents to excessive disruption, noise, pollution, service interruption and delays;
- **Loss of view:** many residents have chosen Knowsley Village due to its scenic nature and the quality of outlook available from many properties especially those at the outskirts;
- **Loss of property value:** the economic law of supply and demand suggests that the greater availability of property will have an adverse effect on price, a period of flat house prices would enable this phenomenon to be examined and proven.

We, the residents of Knowsley Village petition the planning department of Knowsley MBC to:

- a) listen to the residents they represent, and
- b) remove all references to the site at Knowsley Village [KGBS 6] from the local plan, and instead
- c) work to improve release of Brown Belt land for redevelopment, and
- d) recognise that Liverpool City Council can deliver a greater number of houses, offsetting the need to forfeit valuable Green Belt land in Knowsley.

Yours Sincerely,



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Keith Wooding	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B 1- YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Keith Wooding

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
M065

Policy Ref

CS1, to CS5,  
SUE

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

Generally, the Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

It is disappointing that these proposals to build on Greenbelt at South Whiston have only just come to light despite claims that due consultation process has been followed. Public meetings with the Inspector should be re-convened to take into account the views of local residents in accordance with the provision of the Government in the Localism Bill.

It can be seen that the Knowsley Local Plan does not take into account the latest data from the Office of National Statistics (ONS) in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014. Furthermore, the plan, its strategy and objectives contain many conflicting and ambiguous statements, with little in the way of tangible deliverables. Often making reference to flawed and outdated supporting documentation.

Delivery of Strategic Objectives is not considered to be SMART, outputs are not 'measurable' and therefore cannot be seen as being 'achievable'. This in turn would cast doubt on the 'realistic' criteria.

On a personal note if I had submitted proposals for work, of this standard with this many grey areas, undefined & unquantified benefits with little substantive basis, I'd be shot.



4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 11/11/14

## **PART B2 – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
M065

Policy Ref

CS1, to CSS,  
SUE

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| c) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP (updated October 2014) the Secretary of State for Communities, which states "Planners must protect our Green Belt" and "This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development". See link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. It is clear that no exceptional circumstances exist in Whiston.

The North West does not have the Housing shortage that London and the South east has, and as such removal of Greenbelt should not be considered in this case.

This objection to the release of green belt has also been raised as Knowsley council have not proven that all practical alternatives & Brown Field sites have been explored, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley plan fails to give high enough priority and consideration to the empty housing stock within the borough. Knowsley have a very poor record of bringing empty and derelict housing back into use. No reference can be found to any consultation with local housing trusts. Knowsley have not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touches Liverpool at Huyton and the proposals at South Whiston will bring urbanisation up to the boundary with St Helens. Likewise the proposal at Cronton will bring Knowsley closer to Halton. This is NOT consistent with National Policy.

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

c) No, I do not want to participate at any further public hearing

d) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

**PART B3 – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
e) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

In relation to KGBS14 South of Whiston. This policy is contrary to Strategic Objective 8, CS5, CS8 & CS21. Either the principles set out in SO8 are adhered to, or the land is used for development.

As stated in CS5 and CS8, it cannot meet both opposing policies. In fact C21 8.21-8.26 reduce to the point of being ineffective the relevance of CS3 and the requirement to release Green Belt land for development at all.

Given that there are prime areas of land around Prescot & Huyton that previously have been earmarked for housing yet lie undeveloped for a number of years indicates that Knowsley model for predicting the number of houses that will need to be built and the land required is flawed.

If the model was correct those areas would have been redeveloped. This proves that there is no justification to release Green Belt land except for Knowsley council financial benefit.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and there is a further public hearing** as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

e) No, I do not want to participate at any further public hearing

f) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

## **PART B 4– YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
g) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

With regard to the area south of M62. The proposed September modifications took the emphasis off investment in existing locations and placed it firmly on the 'new'. This indicates that Knowsley have little or no appetite to fill the empty space in Huyton Business park and empty units on nearby Fallows Way.

A ten minute drive round Huyton Business Park will show how much unused land or empty unit/buildings are available. The occupancy level is one area where there are inaccuracies in the supporting documentation.

The area south of M62 doesn't need more employment locations, it just needs the existing areas to realise their full potential. Proper effective management would achieve this whilst allowing other Core Objectives to be met.

Clearly the site has potential, as recently a developer acquired a large site for redevelopment.

For Fallows way, it is believed that two of the three units are un occupied at present. If the remaining occupant could be encouraged to relocate to Huyton Business Park, the whole of Fallows Way could be given over to housing. Reducing further the need to use Green Belt land. This would have the added benefit of reducing the number of large lorries that use Windy Harbour Road daily and hence congestion.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11 / 11 / 14

## **PART B5 – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

With regard to KGBS14 South Whiston, there is very little mention of provision for new local centre, expansion or regeneration of existing local shops

As for 6.45, the policy is flawed and mostly irrelevant. This highlights lack of understanding of local issues. In turn this suggests that Knowsley have taken a 'one-solution-fits-all' approach. This element of the core strategy cannot be met.

Little mention is made of requirement for additional facilities such as health care or clinic, GP surgeries and dentist. Nursery and school requirements are also not described.

No reference was found to alternative policy documents that would detail these requirements, which suggests that no additional pre-school or school facilities are planned to meet huge increase in demand for services from such a large housing development. Similarly no additional health care provision. A number of strategic objectives will not be met



4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

12/11/14

## **PART B6 – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M112

Policy Ref

CS7

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| k) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| l) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

With reference to KGBS14 South Whiston area.

Improvements to existing rail network, enhancements to stations.

As a regular train user from Whiston Station, Network Rail have been observed undertaking a passenger survey. This is with a view to CLOSE Whiston station. How does that help meet the transport policy? Clauses 1a, 1c, 2b, 3b, 3e

Also, and contrary to supporting documents, bus routes and times have been revised to the effect of after evening rush hour a minimal number buses are running. This will prevent a number of clauses from being met.

This removes choice, a key policy objective.

In reality this will manifest itself as people making greater use of personal car or cars. This will further bring the transport policy into disarray and have a negative impact on other perceived benefits & strategic policies

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council

### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Kirsty Leigh Easton	
Job Title (if appropriate)	Teacher	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

As a teacher I have a stressful job. I use the greenbelt land regularly to relax and plan my lessons in the tranquility of the countryside. I don't find this tranquility in the park land and don't see why I cannot continue to use the greenbelt land which was set aside for the benefit of the community on the outskirts of major cities. I have just bought a house in Knowsley and found a large choice of properties available. There is no need to use greenbelt land.

*Continue on a separate sheet if necessary...*

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Inspector to say NO AS Plan is Not Sound.

This Plan was not positively prepared as it was against the wishes of the community and not enough time was allocated for objection.

This Plan is not justified as the Knowsley Population has decreased and the demand for housing has fallen. There are a lot of new developments in the area that are empty including the business parks so we don't need new ones, use the ones already built.

The Plan will not be effective within the community who would benefit more from the greenbelt land.

The plan is not consistent with national policy which states that Greenbelt land should be preserved. We have a right to our greenbelt land. Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and there is a further public hearing** as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

3/11/14



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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#### **PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Miss	
Name	K Meredith	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
-----

Policy Ref

KGBS 14

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion, especially as most of my neighbours have only just heard of the proposals to build on Green Belt at South Whiston. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states “Planners must protect our Green Belt” see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case.



**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. There is a Duty to Co-Operate which has not been considered.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton. This is not consistent with National Policy.  
**Continued on separate attachment.**

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

Date 13/11/14

## Attachment – Objections to KGBS 14

<p>E1 To protect, enhance and manage the local character and accessibility of the landscape and countryside across Knowsley</p>	<p>Although some of the locations that would be released from the Green Belt contain areas that have been previously developed and other policies in the plan will seek to protect landscape character, each of the options could support the release of areas of greenfield land and have a negative impact on landscape character. As such, each of the options has the potential to have a negative impact on the objective. However, Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being ‘called in’ by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term. It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward</p>
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### Objections:

- The purposes of Green Belts in planning policy are clear – to protect the countryside from urban sprawl and to retain the character of towns and cities (Natural England, 2010). The proposal to release the Green Belt in South Whiston will exacerbate urban sprawl and its identity and character as a village community will be lost.
- As this is the last area of Green Belt within the South Whiston area the residents will no longer have access to the natural environment and all the benefits that the natural landscape exhibits.
- Those areas which are not to be included in the release from Green Belt – Old Wood and Big Water – would be severely impacted by the influx of residents to the proposed development. These features would be isolated amidst the proposed development and would be rendered unsustainable as a quality natural landscape and habitat for wildlife.
- Release of the Green Belt in South Whiston will contradict the purpose of Green Belt ‘to retain attractive landscapes, and enhance landscapes, near to where people live’.
- The local character and natural landscape of South Whiston stem from the early 12<sup>th</sup> century (Merseyside Historic characterization Project, 2011). The loss of this natural landscape held within the very last of the Green Belt in South Whiston would see the complete eradication of all the historic character that currently remains. The heritage of South Whiston would thus be lost for all current and future residents.
- Whiston is a ‘village’ with a village community. The proposed development would eradicate this village community as numbers would be too great for the community to be considered a village any longer.

E2	Each of the options could support the release of
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<p>To protect, enhance and manage biodiversity, the viability of protected and endangered species, habitats, geodiversity and sites of geological importance.</p>	<p>land from the Green Belt to meet the Borough's housing and employment needs. A number of these Sustainable Urban Extensions contain Local Wildlife Sites and others are located in close proximity to them. In addition, as significant number of the Sustainable Urban Extensions also contain areas of priority habitat. As such, each of the options has the potential to have a negative impact on the objective, although it is acknowledged that other policies in the plan seek to protect biodiversity and features of ecological importance. Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being 'called in' by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term as it may not provide the certainty for the development industry required to guarantee the necessary investment to bring such sites forward for development.</p> <p>It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward.</p>
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Objections:

- The protection, enhancement and management of the remaining area of ecologically isolated green belt will be rendered a belated and insufficient attempt to restore/protect/fix what has already been lost.
- Ecological dispersal and colonization of protected and endangered species will be prevented via fragmentation of vital habitat networks; inadequate dispersal of species will cause a local and regional extinction of nationally significant and endangered species. (Harrison and Bruna, 1999)
- Agricultural land adjoining Big Water and Old Wood is currently providing essential refuge for nationally endangered, red listed grey partridge, a victim species that relies on farming systems for its food source and habitat. (RSPB, 2014). There is a significant population throughout the agricultural land surrounding Big Water and Old Wood. Nationally 87% of the population of grey partridge has been lost since the 1970's, a direct result of habitat fragmentation and loss. It can be expected to deteriorate further owing to the potential loss of the agricultural green belt of South Whiston.
- The agricultural land adjoining Big Water and Old Wood provides refuge and food source for sky lark which has reduced nationally in population by 62%, overall farmland bird species which have reduced by 56%, and lapwings which have fallen in population by 76% since the 1970's (RSPB, 2014). This land is also the hunting, nesting and breeding grounds of buzzards and barn owls the numbers of which will be directly and severely impacted by the loss of the agricultural green belt in South Whiston. So too the population of their prey of field mice, voles and rabbits.
- Impact of human activity upon the remaining area of Greenbelt, i.e. Big Water and Old Wood after development has taken place would have a detrimental effect upon the quality of natural habitats and upon all local species. Increase in human population in addition to the close

proximity to the remaining Greenbelt will further degrade the natural environment as a result of vandalism and overall human impact.

- Without sufficient connectivity of green corridors the isolated patches of Greenbelt will suffer a loss of biodiversity and environmental quality. Current natural linkages connecting Stadt Moers to the South Whiston Greenbelt would be disconnected by the proposed development, preventing colonization and migration of species.
- Migrating water fowl e.g. Swans, Canadian Geese, Coots, Moorhens, Herons which frequent big water will diminish due to the encroachment of urban sprawl. This will have a detrimental effect upon the quality of Big Water fresh water habitat as they naturally manage the fresh water habitats.
- Had a full ecological and habitat survey been undertaken by KMBC it would have established, in summary, that the urban fringe woodland of Old Wood and Big Water, and supportive agricultural land, all within the green belt of South Whiston, was essential to the conservation of the abundance of wildlife and thus their sustainable future.

<p>E3. To adapt to climate change including flood risk.</p>	<p><b>The Strategic Flood Risk Assessment</b> identifies that a small part of the southern section of the site is at risk of fluvial flooding. This risk of flooding will be exacerbated by climate change and this part of the site should only be considered for development as part of a sequential approach. It is recognised that the identified capacity of the site has been derived from the assumption that the portion of the site within Flood Zones 2 and 3 will be excluded from the developable area and unless this is the case, and the other identified mitigation measures are implemented, the proposals could have a negative impact on the objective and its sub-objective of reducing flood risk.</p> <p><b>The Preliminary Flood Risk Assessment</b> indicates that the site also falls within an area that is susceptible to ground water flooding. Nevertheless, the PFRA does recognise that there is a lack of local information in relation to groundwater flooding and that the dataset used only identifies wider areas that may be at risk from groundwater flooding. Accordingly, the information on groundwater flooding is caveated by the acknowledgement that only isolated locations within the overall susceptible area are likely to suffer the consequences of groundwater flooding. Nonetheless, the proposals would result in a significant area of greenfield land being replaced with built development which may have an adverse impact on levels of surface water run-off if suitable measures are not implemented, such as sustainable drainage systems.</p> <p>The proposals would also result in the loss of a greenfield site that has the potential to provide habitat for species and help mitigate higher summer Temps associated with climate change.</p>
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Objections:

- Extensive inland flooding in 2007 focused attention on the economic and human costs of flooding (Pitt, 2008). Climate change is already causing heavier downpours, especially in winter, a trend that is projected to persist and increase flood risk (Defra, 2009). At present the 110 hectares of Green Belt in Whiston acts a soak for surrounding areas, The increased rainfall in Storm conditions(see below) will seriously challenge the ability of the existing main drains (AD51, map MMD-321747-D-SK-00-XX-0001) to handle such downpours. There is a distinct possibility that the M62 could flood if such a large area of Green Belt is put under concrete. Added to this the proposed development at Cronton (which in certain areas is lower than Whiston) would not be able to take any surplus rainfall.
- Properties in Foxshaw Close and Windy Arbour Close and the Green Belt to the rear of these properties are on a very high water table. These properties had to install extra drainage following the development of the Lickers Lane estate in the 1970's as water levels rose and caused flooding to property foundations. Clear spring water was found beneath floor boards which had to be drained in order to prevent subsidence of the properties and to prevent rising damp.

- Further development of the Green Belt to the rear of the properties will further impact the high water table and increase the probability of flooding to these properties and surrounding properties.
- No indication has been given as to the capacity of United Utilities to provide water treatment and sewage treatment, at the local water treatment works, for the proposed development.

<p>E4. To mitigate climate change including using energy prudently and efficiently and increasing energy generated from Renewable sources.</p>	<p>Each of the options would inevitably result in some carbon emissions and could therefore have a negative impact on the objective and its sub-objective. Other policies in the Core Strategy are likely to ensure that all new development is designed in a way to maximise energy efficiency and it is recognised that the proposers of the site have stated that the site may offer opportunities for decentralised energy systems due to the quantum of development proposed. It is however recognised that there is presently no certainty that such systems would be incorporated into the proposals for the site and it is noted that the Knowsley Renewable and Low Carbon Energy Options study (2009) considered that a purely residential development of the area would be unlikely to readily lend itself to a district heating opportunity. In addition, the site is not located within a ‘Priority Zone’ for renewable and low carbon energy as identified by the Liverpool City Region Renewable Energy Capacity Study (2009) and it is therefore unlikely to deliver a reduction in carbon emissions beyond those required by Local Plan policies. The proposals are likely to result in an increase in traffic in the immediate surrounding area. It is however noted that there are a range of local facilities and amenities that are readily accessible from sections of the site including primary schools, a GP and health centre and a local shopping centre on Greene’s road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opposite side of Windy Arbor Road and Huyton Business Park which may reduce the need to travel for work. Furthermore, both Options 1 and 2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, and taking into account the scale of development that would be likely to come forward on the site, it is considered that each of the options have the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of onsite facilities.</p>
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Objections:

- It is quite clear that the development of Green Belt in Whiston will have an overall negative effect on the aim to mitigate climate Change. The Sustainable and Low Carbon Development (5.183 SD32. CS22) removal of the developers need to meet the Sustainable homes/BREEAM standards will increase energy usage.
- The increase in Traffic in the area will increase carbon emissions and have a detrimental effect on Air Quality.
- The Industrial Estate mentioned on Windy Arbor Road has little effect on employment as the few factories that are occupied, have no need for more workers.
- There is also an acceptance that this development will not be suitable for energy generated by renewable sources. In addition, the removal of the requirement to achieve a certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.
- “The need to build more sustainable housing with a limited supply of land means that innovation is necessary but working towards sustainable communities relies on more than the achievement of zero carbon housing; its success will also be determined by the selection of appropriate locations for development”, Neil Williamson FLI, President Landscape Institute

<p>E5. To provide, conserve, maintain and enhance green infrastructure.</p>	<p>Although Options 1 and 2 would support the retention/provision of some areas of public open space, each of the options would result in the loss of substantial area of greenfield land which offers the potential to function as part of the Borough’s Green Infrastructure network and it is considered that each of the options would have a negative impact on this objective due to the area of greenfield land that would be lost. It is however acknowledged that there is only a low level of certainty over this impact of Options 1 and 2 on the objective due to their potential to retain areas of public open space &amp; increase the quality of the accessible green infrastructure network. By contrast, there is a higher degree of certainty that Option 3 would have a negative impact on this objective as it would not offer the same level of protection to areas of Public Open Space.</p>
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Objections:

- The provision of parks and open spaces in deprived areas such as Knowsley is worse than in affluent areas. The removal of this area of Green Belt would severely impact the deprived residents of this area of Knowsley.
- The higher the quality of the green space, the more likely it is to be used. To build over 1500 houses on Best & Most Versatile Grade2 Agricultural land cannot enhance green infrastructure. Every one of the options would result in the loss of large area of essential open green space. This area of Green Belt is THE VERY LAST piece of Green Belt in South Whiston and as such is the highest quality of open green space in the South Whiston area.
- Open green space is essential to health and well-being especially for mental health and preventing and combating mental health issues. Knowsley MBC would be failing in it’s care of, and provision for, it’s residents suffering mental health issues should this area of Green Belt be developed.

<p>E6. To protect, manage and restore land and soil quality.</p>	<p>Although Options 1 and 2 would support the retention/provision of some areas of public open space, each of the options would result in the loss of a substantial greenfield site. It is also noted that the majority of the site is classified as Grade 2 Best and Most Versatile agricultural land and that parts of the site are presently within agricultural use. It is therefore considered that each of the options have the potential to have a significant negative impact on this objective and also on the sub-objective of directing new housing to previously developed land. There is a higher degree of certainty that Option 3 would have a negative impact on this objective as it could also result in development on the greenfield parts of the site that are existing areas of Public Open Space.</p>
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Objections:

- The majority of the site is classified as Grade 2 Best and Most Versatile agricultural land and has been farmed for many years. None of the options will meet the objective to restore land and soil quality. UK soils store over 10 billion tonnes of carbon in the form of organic matter. The size of this store means soil has a vital role to play in helping to combat climate change. “Preventing emissions from soil and exploring how to increase existing stores of soil carbon can make an important contribution to meeting the Government’s emission reduction targets and carbon budgets, introduced by the Climate Change Act 2008”. Defra, Soils Policy Team

<p>E7. To protect, improve and where necessary, restore the quality of inland, and estuarine waters.</p>	<p>The site is in close proximity to a number of bodies of water, including Big Water. Directing development to locations close to these features has the potential to adversely affect water quality unless adequate mitigation measures are adopted. It is however recognised that there is limited certainty about the impact of development in this location on the water quality. In addition, it is noted that each of the options could result in the remediation of any contamination on the site and thereby eliminate a potential source of pollutants for this watercourse. As such, the impact of each of the options on the objective is uncertain.</p>
--	--

Objections:

- It is critical that this precious resource is managed properly to ensure that the needs of society, the economy and wildlife can be met and maintained in the long-term. Surrounding Big Water Lake with a vast housing estate of over 1500 houses must surely impact on the quality of water in the local area. The lake in this area is used for recreation and fished regularly by a local club, it is considered “Good Fishing” one of its advantages is its rural location. We have seen no mitigation of negative effects on water, suggested by Knowsley Council.



<p>E8. To protect, and where necessary, improve local air quality.</p>	<p>The proposals are likely to result in an increase in traffic in the immediate surrounding area but it is recognised that the extent to which this will impact on air quality is uncertain and the site is not within an Air Quality Management Area. It is noted that there are a range of local facilities and amenities that are readily accessible from sections of the site including primary schools, a GP and health centre &amp; a local shopping centre on Greene’s Road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opp side of Windy Arbor &amp; Huyton Bus Park which may reduce the need to travel for work. Nevertheless, these community facilities are some distance from the eastern and southern sections of the site and only the northern sections of the site are within 800m of Whiston railway st &amp; not all of the site is in close proximity to the existing bus routes on Windy Arbor &amp; Lickers Lane. The proposer of the site has also stated that the proposals would include on-site facilities, the provision of new bus routes through the site and that the development would be designed to encourage walking and cycling. Both Options 1 &amp;2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, due to the number of trips that a development of this scale would be likely to generate, it is considered that each of the options has the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of on site facilities.</p>
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Objections:

- It is highly unlikely that a development of over 1500 houses would improve air quality especially if you take into account the level of traffic increase. The suggestion that walking to Greenes Road is an option for a non car owning elderly or young person in winter is a non-starter. Bus services are poor in Whiston at best and non-existent after 8pm at the southern end of Windy Arbor Road.
- “Our farmland and countryside can produce high-quality food and support wildlife when trees play a part in the landscape. We all breathe easier when there are beautiful woods in which to

relax and unwind. And yet the UK needs more trees. We are one of the least wooded countries in Europe and trees and woods continue to disappear from our landscapes”. *Woodland Trust*

- There is a need to reduce the need to travel by car and increase the use of more sustainable forms of transport. Economic activity rates and incomes are lower in Knowsley than the NorthWest average.
- There is a need to retain a greater proportion of retail expenditure within Knowsley to enhance the vitality and viability of the Borough’s town centres.
- 2 of the 15 conservation areas in Knowsley are included on the latest Heritage at Risk register;
- Access to areas of natural and semi-natural open space is poor in parts of the Borough;
- There is a need to conserve and enhance the natural environment recognising the importance of biodiversity.
- There is a need to secure and promote increased energy efficiency and renewable energy sources;
- There is a need to promote and secure more sustainable waste management.
- There is a need to consider the impacts of flooding and flood risk;
- The re-use of land should be promoted to minimise the take-up of greenfield land.

Source: Sustainability issues were derived from the baseline data gathered in 2008 – 2009 to inform the SA SD07 Scoping Report, Knowsley council

None of the Knowsley MB goals, above, will be achieved by releasing Green Belt.

“Air pollution is currently estimated to reduce the life expectancy of every person in the UK by an average of 7-8 months. The measures outlined in the strategy could help to reduce the impact on average life expectancy to five months by 2020, and provide a significant step forward in protecting our environment.” DEFRA The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

<p>E9. To use water and mineral resources prudently and efficiently.</p>	<p>Each of the options is unlikely to have any significant effects on the objective.</p>
--	--

Objections:

The objections would be largely in line with those made against E7 as follows:

- It is critical that this precious resource is managed properly to ensure that the needs of society, the economy and wildlife can be met and maintained in the long-term.
- Surrounding Big Water Lake with a vast housing estate of over 1500 houses must surely impact on the quality of water in the local area.
- The lake in this area is used for recreation and fished regularly by a local club, it is considered “Good Fishing” one of its advantages is its rural location. We have seen no mitigation of negative effects on water, suggested by Knowsley Council.



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

Knowsley Council



**RETURNING THIS FORM**

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- > By email: [LocalPlan@knowslev.gov.uk](mailto:LocalPlan@knowslev.gov.uk)
- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annex, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title		Solicitor
Name		Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Save Knowsley Village Green Belt Group

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

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b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

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Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

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Signature.. [REDACTED] .....

Date.....*12th*.....November 2014



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MRS.	Solicitor
Name	L.J ROSE	Middleton Solicitors
Job Title (if appropriate)	Retired	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Save Knowsley Village Green Belt Group

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

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Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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KNOWSLEY VILLAGE IS A VILLAGE  
1000 Houses will destroy it as a village  
which is unfair to the people who  
bought houses here because it is  
a village

Continue on a separate sheet if necessary...

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Signature.....



Date.....November 2014

13/11/14



## Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

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#### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	LAURA DONO	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

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- |  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
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Please consider the impact of your proposals on Knowsley Village residents. There are hundreds if not thousands of existing properties which are empty and have fell into disrepair. Should we not be looking to develop existing houses rather than line the pockets off land owners and housing developers. We have lived here for 19 yrs and see our house as many other people do as an investment. This proposal will dramatically effect their value, so once again the rich get richer and the poorer get poorer. When exactly do we get ample time to voice our opinions. A Development has just finished two mile away

*Continue on a separate sheet if necessary...*

fill them first and dont be worrying about the next 14 yrs.

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Signature... 

Date... 11<sup>th</sup> November 2014



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE  
14 NOV 2014  
RECEIVED

Knowsley Council

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**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	<i>MR</i>	Solicitor
Name	<i>LEE</i>	Middleton Solicitors
Job Title (if appropriate)	<i>Welder</i>	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Paragraph Ref

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*Leave Knowsley village  
as it is*

*Continue on a separate sheet if necessary...*

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Signature



Date *12*.....November 2014

**From:** Dave & Lianne French [REDACTED]  
**Sent:** 14 November 2014 11:20  
**To:** [REDACTED]  
**Subject:** removal of green belt land in Halewood

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Knowsley Council.

I strongly object to the councils proposal to remove Green Belt land in Halewood to build over 1100 houses.

As a local resident for over 15 years I have not been formally notified of the proposed development and changes. I discovered from a friend who spotted the proposals on lamp posts outside her home. It is surely unlawful to make such major changes without properly informing and consulting with **all** the residents in the immediate vicinity. I wasn't notified of the information meeting held at the local sports centre and again found out by word of mouth. As a resident of Halewood Village I feel that such proposals will significantly change the local area and that I should have been properly informed.

**I believe that such development would:**

- Be inappropriate use of Green Belt land especially when other brown field sites could be considered, hence promoting urban regeneration.
- Affect the character of the countryside, not just visually, but by destroying wildlife. Can you demonstrate the reasons for development outweigh any adverse affect on wildlife and their habitats?
- Provide an unacceptable increase in traffic onto already busy roads and lanes (traffic calming measures are now having to be implemented on Okell Drive)

One of the aims of Green Belt land is to prevent 'urban sprawl' . Once the countryside is gone it will be gone forever – please reconsider your plans and other options available.

Yours sincerely

Lianne French



Knowsley Council

# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

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## PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS + MR	Solicitor
Name	LYNNE / DAVE	Middleton Solicitors
Job Title (if appropriate)	RETIRED.	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Save Knowsley Village Green Belt Group

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments. *SEE LETTER*

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

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Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

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The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

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4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

IF YOU LOOK OUTSIDE KNOWSLEY VILLAGE  
THERE ARE NUMEROUS UNDEVELOPED  
AREAS. SURELY, KNOWSLEY "VILLAGE"  
DOES NOT NEED TO HAVE MORE  
HEAVY TRAFFIC ON KNOWSLEY LANE.

*Continue on a separate sheet if necessary...*

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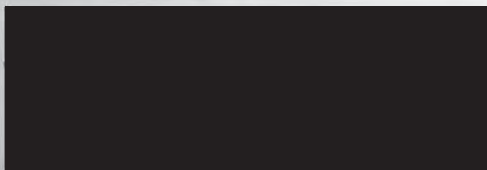
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Signature



Date: 12<sup>th</sup> November 2014



## Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

CHIEF EXECUTIVE  
Knowsley Council

14 NOV 2014

RECEIVED

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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	HALL	Middleton Solicitors
Job Title (if appropriate)	Retired	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

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1. To which proposed modification to the Core Strategy does this representation relate?

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Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I object to any hard to Knowsley Village  
This is a Village i would like it  
to stay that way. This Village goes  
back to the Domesday Book  
If this plan goes ahead it will not be  
a Village any more, it will be an  
Estate i have lived here 55 years  
Please. Dont change it

Continue on a separate sheet if necessary...

Mary Hall

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5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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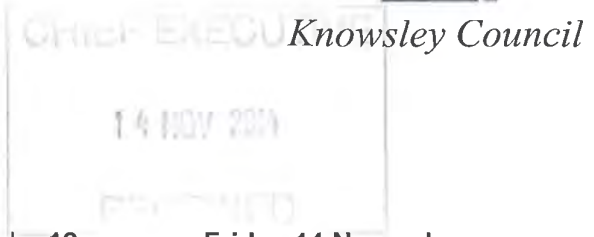
Signature.  .....

Date 10.11. November 2014



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
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	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	Penn	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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SUE1 AppE

Paragraph Ref

2 and 6A.9

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All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Why build on green Belt when there is plenty of Brown fields available, TRAFFIC IS BAD enough now without Building another 100 + odd houses, not to mention the effect on the wild life

Continue on a separate sheet if necessary...

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Signature..  .....

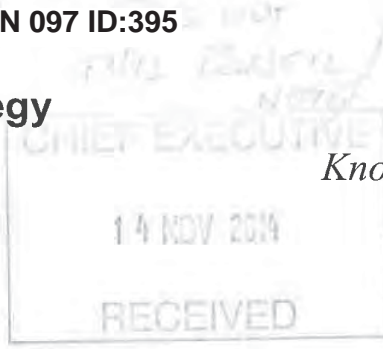
Date... 11<sup>th</sup> ..... November 2014



**Knowsley Local Plan: Core Strategy**

Proposed Modifications - Consultation  
Representations Form

Knowsley Council



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**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MR	Solicitor
Name	MARC ROBINSON	Middleton Solicitors
Job Title (if appropriate)	Delivery Driver (FRED)	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref  Policy Ref  Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

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*KNOWSLEY VILLAGE, & DEPRY EARTH THE LAND OWNER*  
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Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF ✓

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site. ✓

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard. ✓

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere. ✓

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt. ✓

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature...



Date. 11.11.14 November 2014



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

## PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	Solicitor
Name	MARGARET DOLAN	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Save Knowsley Village Green Belt Group

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KBGS 6 should remain in Green Belt.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Dear Sir

I do not want any houses to be built on the land Knowsley Village. Do not need any more houses. it will bring to much traffic to this lovely village

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature.. [redacted] .....

Date..12.....November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Ms	
Name	Margaret Halvorsen	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Because the residents have not been fully informed of the whole process, I would suggest it has not been legally compliant

*Continue on a separate sheet if necessary...*

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I would like to see more in depth consultation as to what might happen next.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 1 - 11 - 14



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	MARGARET MATTHEWS	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref  Policy Ref  Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

- a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.
- b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

**Supplementary Planning Documents (SPD) &  
Local Development Orders (LDO)**  
Consultation - Response Form



Knowsley Council



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**PLEASE COMPLETE ALL QUESTIONS**

**PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Miss	
Name	Marion Green	
Job Title (if appropriate)	Semi Retired	
Organisation (if appropriate)	Forest Stud Ltd	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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**PART B – YOUR RESPONSE**

Please use duplicates of Part B, as necessary for different parts of the document.

1. To which SPD or LDO are these comments intended to relate?

Knowsley Lane. Pattens Farm. by M57.

2. To which part of the SPD or LDO are these comment intended to relate?

Page

Paragraph / Figure

3. Please provide comments below.

As a resident who had, had no prior consultation upto this one in October 2014. No previous local Plan public notices.

I object to this area being removed from Green Belt and removing the safe guards for the Tennants of Pattens farm and their equestrian business. (not to mention the Sewalland)

Development of this area will significantly increase traffic past my access, which is on the north side of Liverpool Road between the two M57 roundabouts. Turning out of my drive is dangerous, not knowing what is coming around the bend.

Slowing down and turning into my drive is dangerous because other cars are unaware of drive.

The land between the M57 and Knowsley Lane is an important green corridor breaking the urban sprawl.

Continue on a separate sheet if necessary...

Signature



Date

13. 11. 14

# Supplementary Planning Documents (SPD) & Local Development Orders (LDO)

## Consultation - Response Form



Knowsley Council

14 NOV 2014

RECEIVED

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**PLEASE COMPLETE ALL QUESTIONS****PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Miss	
Name	Marion Green	
Job Title (if appropriate)	Semi Retired	
Organisation (if appropriate)	Forest Stud Ltd.	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR RESPONSE**

Please use duplicates of Part B, as necessary for different parts of the document.

1. To which SPD or LDO are these comments intended to relate?

A58 Triangle, Prescott.

2. To which part of the SPD or LDO are these comment intended to relate?

Page

M16 A

Paragraph / Figure

6A.

3. Please provide comments below.

I am the owner of Dye House in the western corner of the triangle. I had received and not seen any public notices regarding the Local Plan and my property until a neighbour telephoned me on the day of the Knowsley Park Lane meeting in October 2014



Signature

Date

13.10.14







**KMBC NOTE: ADDITIONAL CONTENT REDACTED DUE TO SENSITIVITY OF INFORMATION, ON REQUEST OF MARION GREEN**

# Supplementary Planning Documents (SPD) & Local Development Orders (LDO)

## Consultation - Response Form



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### PLEASE COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Marion Green	
Job Title (if appropriate)	Retiree	
Organisation (if appropriate)	Forest Steel Ltd.	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR RESPONSE**

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1. To which SPD or LDO are these comments intended to relate?

*Consultation and Negotiation of land Owners*

2. To which part of the SPD or LDO are these comment intended to relate?

Page

Paragraph / Figure

3. Please provide comments below.

*I am the owner of Dye House located in the western corner of the A58 Triangle - Removal of Green Belt.  
The house and approximately 1 hectare of land has been in my families ownership for 75 years being the stockmans house belonging to Forest Farm.  
I have received no notifications or public notices. I can not walk far due to illness and age.  
The occupants of Dye House have seen no notifications either.*

Signature



Date

*13-10-14*

I only found out about the consultations this October due to a neighbour telephoning to see if I was going on the day.



The consultation should be restarted with All Address's within the borough and just outside, notified. Ideally put in with council Tax demands (which never get lost).

This should therefore include all communities for whom the "Local Plan" is for and to be fully included in the making of the plan if they so wish.

# Supplementary Planning Documents (SPD) & Local Development Orders (LDO)



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### PLEASE COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Marion Green	
Job Title (if appropriate)	Retiree	
Organisation (if appropriate)	Forest Steel Ltd.	
Postal Address		
Postcode		
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1. To which SPD or LDO are these comments intended to relate?

Consultation and Negotiation of land Owners

2. To which part of the SPD or LDO are these comment intended to relate?

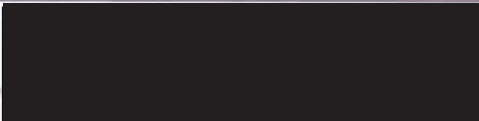
Page

Paragraph / Figure

3. Please provide comments below.

I am the owner of Dye House located in the western corner of the A58 Triangle - Removal of Green Belt. The house and approximately 1 hectare of land has been in my families ownership for 75 years being the stockmans house belonging to Forest Farm. I have received no notifications or public notices. I can not walk far due to illness and age. The occupants of Dye House have seen no notifications either.


Signature



Date

13-10-14

I only found out about the consultations this October due to a neighbour telephoning to see if I was going on the day.



The consultation should be restarted with ALL Address's within the borough and just outside, notified. Ideally put in with council Tax demands (which never get lost).

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### PLEASE COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Marion Green	
Job Title (if appropriate)	Semi Retired	
Organisation (if appropriate)	Forest Stud Ltd.	
Postal Address		
Postcode		
Telephone Number		
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**Part B - YOUR RESPONSE**

Please use duplicates of Part B, as necessary for different parts of the document.

1. To which SPD or LDO are these comments intended to relate?

A58 Triangle, Prescott.

2. To which part of the SPD or LDO are these comment intended to relate?

Page

M16 A

Paragraph / Figure

6A.

3. Please provide comments below.

I am the owner of Dye House in the western corner of the triangle. I had received and not seen any public notices regarding the Local Plan and my property until a neighbour telephoned me on the day of the Knowsley Park Lane meeting in October 2014

Signature

Date

13.10.14



*[Faint, illegible handwritten text on lined paper, possibly bleed-through from the reverse side.]*

Telephone

13<sup>th</sup> November 2014.

Dear Mr Howarth

Can I rely on your assistance with the attached matter.

Please read the attached form.

Yours Sincerely

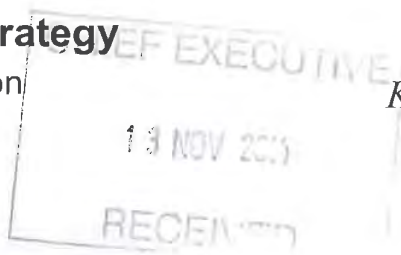
**KMBC NOTE: ADDITIONAL CONTENT REDACTED DUE TO SENSITIVITY OF INFORMATION, ON REQUEST OF MARION GREEN**



**Knowsley Local Plan: Core Strategy**

Proposed Modifications - Consultation  
Representations Form

Knowsley Council



**RETURNING THIS FORM**

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- > By email: [LocalPlan@knowslev.gov.uk](mailto:LocalPlan@knowslev.gov.uk)
- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annex, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title		Solicitor
Name	Mark Lewis	Middleton Solicitors
Job Title (if appropriate)	Landscape Gardener	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Save Knowsley Village Green Belt Group

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I object to everything that has been proposed about development around Knowsley Village. As I live along Knowsley Lane, to double the traffic along the lane would be horrendous. Already it's like a motorway with constant traffic from 6 a.m. - 10 p.m. and on top of that the motorway behind is just constant noise everyday.

To lose the greenbelt would destroy the character and wildlife that lives there. If you took away the greenbelt there would be nothing left around the village and that little bit of quality of life when going for a walk would be lost forever.

Continue on a separate sheet if necessary...

DON'T WRECK OUR VILLAGE.

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature..  .....

Date 10<sup>th</sup> November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council

CHIEF EXECUTIVE  
04 NOV 2014  
RECEIVED

### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MISS	
Name	MARY LOUSDALE	
Job Title (if appropriate)	RESIDENT	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.



## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

MARY

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Objections to the SOUNDNESS of  
These proposals with ref to notes 2.2 & 2.3  
These proposals are UNSOUND  
because of their lack of  
CONSULTATION – we have had none  
FEASIBILITY – only presentation  
No reference to infrastructure –  
cf. N04

Continue on a separate sheet if necessary...

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Legal. 2.2. No involvement of community to be involved is not the same as being presented with plans as happened in Holwood. Sustainability not possible without infrastructure. None given - only houses (over 1,000) proposed.

2.3 No evidence credible of participation. No reference to ensuring social, environmental, economic & resources. Plans are not effective unless consideration given to -

- a) Primary school places (all schools capacity now)
- b) Traffic management.
- c) Protection of wild life (owls) - woodland.

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date

31.10.14

# Supplementary Planning Documents (SPD) & Local Development Orders (LDO)



Knowsley Council

## Consultation - Response Form



### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Tuesday 21 October 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Mike Gittens	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

**PART B – YOUR RESPONSE**

Please use duplicates of Part B, as necessary for different parts of the document.

1. To which SPD or LDO are these comments intended to relate?

*Public Consultation.*

2. To which part of the SPD or LDO are these comment intended to relate?

Page

Paragraph / Figure

3. Please provide comments below.

*Due to the gravity of the local plan and its long term consequences for communities and their environment. I deem the present methods of publication unfit for purpose only reaching a small percentage of the population.*

*If the Council and government is serious about empowering local communities in descision making as sets out in the definition of local Plans. Every household in the borough should be mailed and to save costs enclosed with the council tax and rate demands.*

*The Public Notices were unfit for purpose, through out the development of this plan. However legally compliant they may have been.*

*Continue on a separate sheet if necessary...*

Signature



Date *12th November 2014.*



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

#### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014**. **Forms received after this time can not be accepted.**

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#### **PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mr	
Name	Michael Humphreys	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

South of  
Whiston

Policy Ref

KGBS14

Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

S1 – With regards to this statement I do not see any evidence in the proposed modifications which will bring employment into the region beyond the initial building stage. The building stage does not guarantee that the local building trade will benefit as corporate house building companies have established suppliers and will not necessarily benefit local building trade. If you consider that Knowsley's own website advises that apprentices be paid the statutory minimum wage I don't see this having an impact on the economy to justify the building of a minimum of 1503 houses.

S3 - With no plans to increase police budgets only to decrease based on the national plan for the police. In fact a rapid population growth will increase the cost of services such as police.

S4 – Knowsley shows no sign of being able to communicate the basics of ripping out the greenbelt in its own local area so I have little hope that they will make a contribution to improving community decision making.

S5 – Knowsley has one of the poorest results for emphysema, breast-feeding take up rates, childhood tooth care (I could go on) with no consideration for expanding the local NHS facilities it would either put a massive drain on the existing services or leave the new inhabitants with no facilities to use such as GP's, dentists and childcare. There is no plan in place that shows we will have confidence in our council to adapt and implement the necessary. This news article demonstrates the type of mismanaging that continues today  
<http://www.liverpoolecho.co.uk/news/liverpool-news/councillors-anger-18m-unspent-funding-7883509>

### 3. Continued

E1 – by building on the greenbelt we will no longer have access to the landscape and countryside across Knowsley as the remainder of the Greenbelt is on the Derby Estate which is private property with very little access.

E2 – I simply don't understand how you can justify this statement as you plan to cover it in concrete.

E3 – I can find no record of Knowsley council accessing the flood records through the Environmental Agency held in Warrington which shows upon building Foxshaw close and Windy Arbor Close faced difficulty due to wet soil, flooding and landslides. Though there are no legal requirements to do this surely when making plans to develop an area ground conditions are a priority!

E4 – E11 there is no evidence to suggest this will have a positive effect on the area by removing green land in favour of housing and concrete.

EC1 – The governments own Portas report shows that more and more people are moving away from shopping experiences similar to those found on Greene Lane in Whiston Village. With little investment being put into these areas they are starting to look tired and unkempt.

EC2 - several attempts to revitalise the centre of town in Prescot have failed and we continue to see shops close and left empty. This in no way would attract people to an area leaving this proposed estate with little interest.

EC3 – the proposed occasional shop within the plan does not make a thriving business to employ 3000 people does it? And the proposed warehouse which I assume (like many of the facts in this document) will employ people on or near minimum wage I do not see how they would be able to afford some of this housing.



14/12/21

2/2/21

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

The council has failed to release brownfield sites in a timely manner for development such as the 2 demolished leisure centres in Huyton and Prescott. Further investigation as to why Green belt is now favoured over all brown field should be investigated.

Knowsley Council have failed in their due diligence to inform the local population as to the proposed plans. They themselves have accused Royal Mail of failing to deliver notifications however there has been no pressure or charges brought for tampering with the mail. It has only been a local campaign that has seen the population informed.

The 5 day consultation last year when very few people came shows how poorly informed people were in comparison to all the forms you are receiving now in protest to it. I would recommend a new consultation of the local people.

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

14/11/14





**Knowsley Local Plan: Core Strategy**

Proposed Modifications - Consultation  
Representations Form

CHIEF EXECUTIVE  
14 NOV 2014  
RECEIVED

Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MR & MRS	Solicitor
Name	PHILLIPS	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Save Knowsley Village Green Belt Group

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

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The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KBGS 6 should remain in Green Belt.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I write in connection with the above Planning application. I have examined the Plans to remove the green belt. I wish to strongly object to the ~~not~~ removal of this. Our village has a historic back ground, which I feel make this village unique. To have land used in a manner which over populates the area is extremely upsetting.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature..  .....

Date...12.....November 2014



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

## RETURNING THIS FORM

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- > By email: [LocalPlan@knowslev.gov.uk](mailto:LocalPlan@knowslev.gov.uk)
- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annex, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

## PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	Solicitor
Name	Nichola Saunders	Middleton Solicitors
Job Title (if appropriate)	Fundraising Manager	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Save Knowsley Village Green Belt Group

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS6

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KBGS 6 should remain in Green Belt.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I feel certain that an excellent forward thinking Knowsley Council would look to existing brownfield sites for industrial development and seek other ways to increase housing stock without compromising naturally beautiful areas. The legacy for our children is a beautiful sustainable environment to inspire and enjoy; an aspirational environment. High density housing with little green space has already proven to be detrimental to society - let us be creative and conservative.

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date.....13.....November 2014





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

DEPUTY CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

RECEIVED

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	PATRICIA TODHUNTER	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

*mu*

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

*XGB514*

Paragraph Ref

*E6*

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I object entirely to the building on greenbelt land.

- The wiping out of all its habitat in the area.  
12 Pheasants  
6 Buzzards, Robins, chaffins, sparrows, gold finch, wrens, green finches, owls, bats, foxes, and many more, cannot envisage the desolation this would cause.
- Whiston is a village. the proposal of building thousands of more houses + the population envisaged would devastate this area, longer waiting times for doctors, hospitals already overworked + underfunded!! where are the schools to cope?
- Traffic congestion is all-ready too much for the area to cope with. Introducing more roads will only exacerbate the ongoing problems we have in this area. Pollution, noise!

Continue on a separate sheet if necessary.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

We moved to Halswood Park, Whiston. 25 years ago.  
The reason being to enjoy the surrounding countryside  
and finally to enjoy our ~~own~~ retirement.

~~The~~ Up to a few weeks ago we were totally  
unaware of the building proposals. We had no  
leaflets put through our door. even though the  
council said they did!

Disgusted with the way this has progressed without  
our knowledge.

FINALLY - No This is not a viable proposal for  
WHISTON!

p.s. This is not people friendly form and should have  
been simplified for ordinary people like us!!  
Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

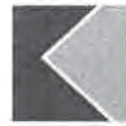
**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

1/11/2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE  
12 NOV 2014  
Knowsley Council

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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr.	
Name	Phil Lawson	
Job Title (if appropriate)	Senior Probation Officer	
Organisation (if appropriate)	Greater Manchester Probation	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

My arguments are in relation to the Soundness of the Proposed Infrastructure as a Corridor out of the Whiston area I know how bad Congestion is which will be exacerbated Considerably by the Proposed development.

Justified As a Whiston resident I have only recently been informed about the development, which is at odds with Knowsley Council Policy that "the plan should be based on robust credible evidence with participation from the local Community (PG 01).

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date 01/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Paul Marshall	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Paul Marshall

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

All relevant

Policy Ref

All relevant

Paragraph Ref

All relevant

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

#### Consultation Process

I would like to make clear that I wholly reject the assertion made in section 1.3 of the guidance notes of this form (CS Mods Response Form and Guidance PDF), which states

*"Comments are sought specifically on the proposed modifications to the Plan. This is because parts of the Plan which are unchanged have already been subject to consultation and discussed at the Examination hearings. "*

I reject this on the grounds that the Council's claims that enough people were informed of the consultation process are unfounded, with myself and hundreds if not thousands of others being completely unaware of the Consultation Process or the Local Plan even existing until after these important consultation periods had ended.

Also although a lot of information may exist at the specified website address, a lot of residents are unaware of it and some do not even have access to or use the internet in the first place, which is what the entire consultation process is more or less designed around, excluding further people from the process.

If the council has not properly informed its constituents of the consultation process, then there is no way that that process can then go on to be legally compliant or sound. Huge swathes of people concerned and affected by the Local Plan have not been informed of the consultation until after key phases were completed and therefore those phases cannot be considered to be valid.

**CONTINUED....**



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

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- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature [REDACTED]

Date 7<sup>th</sup> of November 2014

Further objections to the Local Plan include the following points:

### **WILDLIFE**

The wildlife on the greenbelt site must be protected at all costs, but no guarantees have been made about this. At the public consultation in Whiston, a video of which can be found here: <https://www.youtube.com/watch?v=d3WuxRrS1ow&list=UUTaqTuHMu4mtYyoTYUCyMrQ>

██████████ of Knowsley Council stated that the council's own survey commissioned to assess the area found that there is significant ancient woodland and valuable wildlife within the greenbelt. He then went on to state that they would 'like' for developers to develop on the areas that have less value in this respect, but later in the same video Knowsley Council's representatives admitted that any details on where would be developed and where wouldn't would not be a decision for the council but for the developers.

In other words, there is no guarantee that the wildlife and woodland would be protected, and what is certain is that at least part of it (the supposedly 'less valuable' parts) would be lost.

### **POPULATION**

Knowsley's population has been in decline for several decades and there is no solid evidence that this is going to change. Even population projections from Knowsley Council's own data (Sub National Population Projections Update 2014) offer contradicting guesses and predictions of growth far lower than that would necessitate the exceptional circumstances which would justify removing the land in question from greenbelt status. There are already significant numbers of empty properties all over the borough, as well as plenty of brownfield that remains undeveloped as well as business properties that remain vacant.

### **GREENBELT STATUS**

The council attempts to assure us that the plan is only to remove the protected land out of greenbelt status, and that this doesn't necessarily mean it will be developed. It will be a lot more likely to be developed once it has lost greenbelt status protections afforded to it. The idea that taking the status away is in itself an innocuous act is incredibly disingenuous.

### **BROWNFIELD AND ECONOMIC VIABILITY**

The Government Secretary of State Eric Pickles recently went on record to reiterate that councils must protect greenbelt at all costs and may only consider developing greenbelt land in extremely exceptional circumstances. Such circumstances have not been proven by the Local Plan, and not enough has been done to source alternative land for development. Economic Viability of brownfield land should not be a concern of the council, which does not own the greenbelt. Simply stating that developers would prefer the more lucrative economic prospect of greenbelt development over developing on brownfield does not fall into exceptional circumstances or a last resort justifying its release from. The council states government has forced its hand to develop greenbelt, and Government says don't develop on greenbelt. If even government and the council cannot agree on who is the driving force behind this plan, then how can the plan be considered legally compliant and sound?

In conclusion, I oppose the legal compliance and soundness of the local plan on the following grounds:

- No guarantees of protection to wildlife or heritage land from developer's future proposals.
- Seriously flawed consultation process which failed to involve the majority of the affected constituents within the consultation period.
- Insufficient evidence that the population of Knowsley will increase to the degree that necessitates the scale of development considered.
- Insufficient evidence that other sites were properly considered, or that the Government's instruction to protect greenbelt at all costs has been adhered to.

The law states that Greenbelt cannot be developed except as a last resort, and the circumstances which constitute this have not been proven by any stretch of the imagination. If the government is against greenbelt development, if the council was reluctant to use the greenbelt in its plan, and if the people themselves are against the development, how can it go ahead? Do developers now have the power to govern our country and our communities? Does economic viability trump both the law and the will of the people?



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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#### **PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title		
Name	Paul Woods	
Job Title (if appropriate)	N/A	
Organisation (if appropriate)	N/A	
Postal Address	██████████ ██████ ██████	
Postcode	██████	
Telephone Number	████	
Email Address	████████████████████	
Preferred Method of Contact	██████	

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**PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref	<input type="checkbox"/> All relevant	Policy Ref	<input type="checkbox"/> All relevant	Paragraph Ref	<input type="checkbox"/> All relevant
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**2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
a) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

In order for the local plan to be sound, it should be “*founded on a robust and credible evidence base involving: **evidence of participation of the local community** and others having an interest in the area; and research/fact finding: the choices made in the Plan are backed up by facts*”

Firstly, I live approximately 300ft away from land on Knowsley Lane that is mentioned in the local plan for greenbelt release. I’ve lived here for over 20 years, and I’ve lived within half a mile of this land for the other 30 years on my life, and I was not officially informed of the plans until 21<sup>st</sup> Sept of this year. Because of this, I have been unable to participate in the development of this plan as a part of the local community. I know of many other members of the local community, who feel this way too. Therefore, I do not believe that there has been proper and sufficient participation of the local community.

Since the proposals were publicised by Knowsley Council (Sept 21<sup>st</sup> 2014), there has been a massive show of objections against the plans to release greenbelt from the Knowsley community. I’ve yet to speak to anyone (with the exception of Councillors and/or Council Officers) who agrees with the greenbelt release proposals within the local plan.

In July 2014, a poll was set up on the Facebook page [www.facebook.com/groups/huytontpwigu](http://www.facebook.com/groups/huytontpwigu) asking members of the public if they would be in favour of building houses and a business park on the greenbelt land on Knowsley Lane. At this moment in time, 202 people have voted. 198 are against and 4 are for the plan. This is over 98% of people polled who are against building on the greenbelt land concerned. I would say that this is a very good representation of the feeling of the community over these plans, and this needs to be taken into account.

**Continued.....**

In order for the local plan to be sound, it should be *“founded on a robust and credible evidence base involving: evidence of participation of the local community and others having an interest in the area; and research/fact finding: the choices made in the Plan are backed up by facts”*

The evidence by which Knowsley Council are using to ascertain population and household rises in order to determine how many properties will be needed by the Knowsley Community in the future, is unreliable simply because of the fact that past ONS projections have been shown to be inaccurate and yet Knowsley Council are prepared to lose vast areas of greenbelt based on such unreliable evidence.

**Section 2.1.8** (page 15) of the Technical Report produced by Knowsley Council in 2013 states that *‘the Office of National Statistics population projections are directly relevant to considering the level of new housing to be provided.’*

**Section 2.10** (page 16) of the submitted Knowsley Core Strategy (**July, 2013**) states, “National projections indicate that the borough’s population will increase by about 4000 between 2011 and 2021. This figure is based upon the interim 2011-based sub national population projections.

**Section 4.3.6** (pages 44 - 45) of Planning for Housing Growth in Knowsley (**Technical Report produced by Knowsley Council in 2013**) gives a projection that the population of Knowsley is expected to rise by just over 3000 people between 2011 and 2021.

However, the sub-national population projections update (**June 2014 version, document SD31** in the examination library) gives a much lower figure, over a greater time period. **Section 6.1** (page 16) of this document states that Knowsley’s total population is expected to rise by 1800 persons between 2012 and 2037.

Previously, the ONS predicted a rise in Knowsley population would be between 2006 and 2029 of +7500 , from 151,300 to 158,800. Yet eight years later, the Knowsley population has declined, as it has done since the 1970’s.

Therefore, it is my view that we cannot lose our valuable, and highly agricultural greenbelt land, based upon the say so of highly unreliable evidence. Once this valuable is developed, it is lost forever.

The Knowsley Strategic Housing Land Availability Assessment (SHLAA) 2012 identifies that “land within **the urban areas** of the Borough can provide a net supply of land sufficient for **5,636** dwellings. This is sufficient to cover a period of 12.6 years”.

This is more than enough new houses to cope with Council’s predicted population rise of 1800, IF indeed the population numbers were to actually increase, which would go against all previous records since 1971.

There are currently 64,629 dwellings in Knowsley, of which 3.13% are vacant, which is **2020** empty properties.

Furthermore, in October 2014, the Government issued new guidance regarding the release of greenbelt land. Specifically the new guidance makes it clear that councils do not have to build on the Green Belt just to meet the locally set five-year housing targets. **Housing need cannot be used to justify ‘inappropriate development’ in the green belt, it said** and that **“Unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “exceptional circumstances” justifying inappropriate development on a site within the Green Belt.**

At the Knowsley Town Council meeting on 16<sup>th</sup> Oct 2014, Council Officer Lisa Harris stated, *“What I would say is, that the exceptional circumstances would be the issue of us having insufficient land (for the development on greenbelt)”*

The National Planning Policy Framework makes it clear that, once green belt boundaries have been established they should ‘only be altered in exceptional circumstances’

I do not believe that Knowsley Council has demonstrated that any exceptional circumstances exist for the release. Of greenbelt.

In conclusion, the housing targets set by Knowsley Council are too high (given the recent 2012-based population forecasts). Density assumptions are too low. More land is being considered for removal from the Greenbelt, than is actually required. Too much of the land being considered for removal from the Greenbelt is of high quality, highly productive agricultural land. Allocation of some Greenbelt sites as reserve sites for housing, will result in harm to the Greenbelt, and undermine it's aims and objectives

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

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5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy** and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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**Signature** Paul Woods **Date** 6<sup>th</sup> Nov 2014

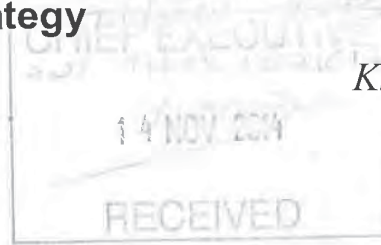
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## Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

Knowsley Council



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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	Solicitor
Name	PAULA ROBINSON	Middleton Solicitors
Job Title (if appropriate)	PHYSICALLY INCAPABLE TO TAKE A JOB	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref  Policy Ref  Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

These representations relate to policy SUE1 and the link changes in policies CS2 & CSS

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda. ✓

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village. *THIS BUILDS INTO PROGRESS & CHANGES WILL RUIN THIS LOVELY VILLAGE, & DEEPLY ENRICH THE LAND OWNERS*

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound. ✓

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative ✓

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF. ✓

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site. ✓

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard. ✓

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere. ✓

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KBGS 6 should remain in Green Belt. ✓

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

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Signature 

Date *11.11.14* November 2014

Local Plan Team, Knowsley MBC,  
1<sup>st</sup> Floor Annex, Municipal Buildings,  
Archway Road, Liverpool, M36 9YU.

Dated: Thursday 13<sup>th</sup> November 2014

**Green Belt Modifications at Knowsley Village Reference KGBS 6**

Dear Sir / Madam,

I am writing regarding the Green Belt modification at Knowsley Village reference KGBS 6 in the local plan for 2014. I believe the planned changes are irresponsible, are based on a planning horizon that is too long to avoid risk and deliver certainty, will destroy the character of Knowsley Village and compromise the Knowsley Village Conservation Area.

I challenge the modification on the following **material** grounds:

- **Existing policy:** the modification contradicts local, strategic and national planning policies;
- **Highway issues:** Knowsley Lane cannot accommodate the volume of traffic that will be generated by extended development generating adverse community and economic impact;
- **Capacity of physical infrastructure:** the introduction of over 50% more dwellings would impose disruption by demanding that existing infrastructure is renewed AND cause issues in the drainage at Knowsley Village which is already problematic; ✓
- **Nature conservation:** there will be significant negative impacts on the Conversation Area;
- **Unacceptable pollution:** aspects of Knowsley Village are high polluted, adding c1,000 homes and cars will exacerbate this issue with the potential to cause healthcare problems.

And the following **non-material** grounds:

- **Problems arising from the construction period:** a protracted development period will subject existing residents to excessive disruption, noise, pollution, service interruption and delays; ✓
- **Loss of view:** many residents have chosen Knowsley Village due to its scenic nature and the quality of outlook available from many properties especially those at the outskirts; ✓
- **Loss of property value:** the economic law of supply and demand suggests that the greater availability of property will have an adverse effect on price, a period of flat house prices would enable this phenomenon to be examined and proven. ✓

We, the residents of Knowsley Village petition the planning department of Knowsley MBC to:

a) listen to the residents they represent, and b) remove all references to the site at Knowsley Village [KGBS 6] from the local plan, and instead c) work to improve release of Brown Belt land for redevelopment, and d) recognise that Liverpool City Council can deliver a greater number of houses, offsetting the need to forfeit valuable Green Belt land in Knowsley. ✓

Yours Sincerely,

[Redacted Signature]



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mrs	Solicitor
Name	PAULINE COLUMBINE	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation Save Knowsley Village Green Belt Group

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref KGBS6 Policy Ref SUE1 AppE Paragraph Ref 2 and 6A.9

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No	
a) Legally Compliant (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>No exceptional circumstances are demonstrated</i>
b) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

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All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

- Infra structure of Knowsley Village is insufficient to accommodate such expansion.
- Destruction of village exclusive Rural outlook
- Value of properties existing will be de-valued with new properties + construction work on doorstep
- Wild life affected by building
- Increase in crime with influx of people from other areas

Continue on a separate sheet if necessary...

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5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

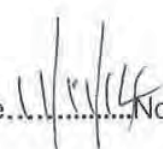
b) Yes, I wish to participate at any further public hearing

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Signature.....



Date.....November 2014







# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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#### **PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mr	
Name	Philip Williamson	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	email	

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## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

All relevant

Policy Ref

All relevant

Paragraph Ref

All relevant

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### **3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

#### Consultation Process

I would like to make clear that I wholly reject the assertion made in section 1.3 of the guidance notes of this form (CS Mods Response Form and Guidance PDF), which states

*"Comments are sought specifically on the proposed modifications to the Plan. This is because parts of the Plan which are unchanged have already been subject to consultation and discussed at the Examination hearings. "*

I reject this on the grounds that the Council's claims that enough people were informed of the consultation process are unfounded, with myself and hundreds if not thousands of others being completely unaware of the Consultation Process or the Local Plan even existing until after these important consultation periods had ended.

Also although a lot of information may exist at the specified website address, a lot of residents are unaware of it and some do not even have access to or use the internet in the first place, which is what the entire consultation process is more or less designed around, excluding further people from the process.

The 'signage' around the proposed sites for removal of the green belt, which amounts to a single A4 sized notification tied to a nearby lamppost along the whole perimeter of the sites do not sufficiently inform local residents who live outside the 200m 'notification zone'.

**CONTINUED....**

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

If the council has not properly informed its constituents of the consultation process, then there is no way that that process can then go on to be legally compliant or sound. Huge swathes of people concerned and affected by the Local Plan have not been informed of the consultation until after key phases were completed and therefore those phases cannot be considered to be valid.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
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**Signature**

**Date**

Further objections to the Local Plan include the following points:

## **WILDLIFE**

The wildlife on the greenbelt site must be protected at all costs, but no guarantees have been made about this. At the public consultation in Whiston, a video of which can be found here:

<https://www.youtube.com/watch?v=d3WuxRrS1ow&list=UUTaqTuHMu4mtYyoTYUCymrQ>

Jonathan Clark of Knowsley Council stated that the council's own survey commissioned to assess the area found that there is significant ancient woodland and valuable wildlife within the greenbelt. He then went on to state that they would 'like' for developers to develop on the areas that have less value in this respect, but later in the same video Knowsley Council's representatives admitted that any details on where would be developed and where wouldn't would not be a decision for the council but for the developers.

In other words, there is no guarantee that the wildlife and woodland would be protected, and what is certain is that at least part of it (the supposedly 'less valuable' parts) would be lost.

## **POPULATION**

Knowsley's population has been in decline for several decades and there is no solid evidence that this is going to change. Even population projections from Knowsley Council's own data (Sub National Population Projections Update 2014) offer contradicting guesses and predictions of growth far lower than that would necessitate the exceptional circumstances which would justify removing the land in question from greenbelt status. There are already significant numbers of empty properties all over the borough, as well as plenty of brownfield that remains undeveloped as well as business properties that remain vacant. In addition to this, the council's bigger neighbour Liverpool, which contains far more social, cultural and industrial infrastructure is planning to increase the number of dwellings by far more than the projected population growth to attract people to the area. No doubt a number of those people will come from Knowsley and other surrounding councils.

In the local plan no consideration has been given to the necessary social and green infrastructure that is required to accommodate the new dwellings. In Halewood in particular, most of the primary schools are already oversubscribed and would be unable to accommodate the hundreds of children that would come with 1124 new dwellings. Similar arguments apply to the local GP and dentist surgery's.

## **GREENBELT STATUS**

One of the five purposes of the green belt is the 'prevention of urban sprawl into the countryside', while perhaps not being legally classified as 'countryside', Yew Tree Farm on lower road is regarded by many of the residents of Halewood as being part of the countryside, and perhaps not having a history going back a hundred years, it does have a historical value to the people of Halewood. The idyllic countryside feel of the Yew Tree Farm shop and coffee barn will now be ruined by being directly opposite to a large housing estate instead of the farmland that currently faces it.

The council attempts to assure us that the plan is only to remove the protected land out of greenbelt status, and that this doesn't necessarily mean it will be developed. It will be a lot more likely to be developed once it has lost greenbelt status protections afforded to it. The idea that taking the status away is in itself an innocuous act is incredibly disingenuous.

## **BROWNFIELD AND ECONOMIC VIABILITY**

According to the government's own Natural Land Use Database there is enough brownfield sites in the country to accommodate over 1.5 million new dwellings and still more for commercial and industrial development. Clearly there is not yet a requirement to build on arable land that is required to feed a growing population.

The Government Secretary of State Eric Pickles recently went on record to reiterate that councils must protect greenbelt at all costs and may only consider developing greenbelt land in extremely exceptional circumstances. Such circumstances have not been proven by the Local Plan, and not enough has been done to source alternative land for development. Economic Viability of brownfield land should not be a concern of the council, which does not own the greenbelt. Simply stating that developers would prefer the more lucrative economic prospect of greenbelt development over developing on brownfield does not fall into exceptional circumstances or a last resort justifying its release from. The council states government has forced its hand to develop greenbelt, and Government says don't develop on greenbelt. If even government and the council cannot agree on who is the driving force behind this plan, then how can the plan be considered legally compliant and sound?

In conclusion, I oppose the legal compliance and soundness of the local plan on the following grounds:

- No guarantees of protection to wildlife or heritage land from developer's future proposals.
- Seriously flawed consultation process which failed to involve the majority of the affected constituents within the consultation period.

- Insufficient evidence that the population of Knowsley will increase to the degree that necessitates the scale of development considered.

- Insufficient evidence that other sites were properly considered, or that the Government's instruction to protect greenbelt at all costs has been adhered to.

The law states that Greenbelt cannot be developed except as a last resort, and the circumstances which constitute this have not been proven by any stretch of the imagination. If the government is against greenbelt development, if the council was reluctant to use the greenbelt in its plan, and if the people themselves are against the development, how can it go ahead? Do developers now have the power to govern our country and our communities? Does economic viability trump both the law and the will of the people?

In a recent Knowsley town council 'Local Plan' meeting, the planning officers stated that the original plan, that only included brownfield sites to be developed, was rejected by the Planning Inspector due to a number of brownfield sites being 'unviable'. Presumably this means commercially unviable to the housing developers who own the land, i.e. there is insufficient profit for them to make in building on the land (or less profit to be made than building on the green belt). Might I suggest that if an organisation not driven by profit, in fact driven by supplying residents with their housing needs, such as a local authority, purchase this land and build social housing on it. This would result in little, or no green belt being developed to meet the area's needs and would prove the council is working for the residents benefits rather than working for the benefit of corporations such as Redrow Homes and Taylor Wimpy and wealthy landowners such as Lord Derby.

**From:** [REDACTED]  
**Sent:** 02 October 2014 22:18  
**To:** [REDACTED]  
**Subject:** FW: Ms Rachel Freeman, [REDACTED]

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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**From:** Rachel Freeman [REDACTED]  
**Sent:** 01 October 2014 16:36  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Green Space  
**Importance:** High

Hello [REDACTED]

Yes, I am emailing with regards to KMBC's Local Plan. Can you please take this to the Council please?

I am literally sickened to receive the letter from KMBC Policy Manager, Jonathan Clarke regarding the release of the Knowsley Lane green belt land. Apparently there is a need for houses and offices so I've been told. How can this be the case when there has already been development on the Hillside Estate accessible from Knowsley Lane? Aren't there empty houses there waiting to be filled.....and space for further development? Yes, I believe there is which I saw with my own eyes when I took a walk there a couple of weeks ago.

What are the plans for the patch of land on the corner of Primrose Drive and Knowsley Lane, where Knowsley Training Centre used to occupy? I suppose more houses hey? Why is there a need for office space, when you have King's Business Park again not occupied to full capacity?

Where is the evidence that supports the need for this development? Show me the research and proof that states hundreds of people want to move to this area and therefore require this development to go ahead.....Show me the evidence that supports the need for more office space. For some reason, I don't truly believe that this is a need....more like a want. More like a stab in the dark to see if it works and hundreds of people flock to Knowsley! What a gamble if there is not sufficient evidence, and who accepts responsibility if it all goes pear shaped?!!!!

What if this beautiful piece of land/natural habitat is removed forever by this development and the houses and offices do not get occupied? What then? I have been informed that 450 houses are to be built, whether that means purely on Knowsley Lane Green Belt or between the 10 areas, I don't know. What I do know is this.....once that land becomes a housing estate / industrial park and based on an average of two cars per household, the congestion and pollution will be diabolical for all residents directly on/off Knowsley Lane, Prescott, Knowsley Village, Huyton. Even accessing / exiting the M57 could be a nightmare.....DOES ANYONE TRULY CARE ABOUT US LITTLE PEOPLE..... MONEY TALKS HEY?!

Don't the people responsible for this development realise that Knowsley lane is already very busy as it is with the amount of traffic that goes through in either direction, and their bright idea is to bring more houses, cars..... POLLUTION AND CONGESTION!!!!

For the people who are making this decision, does it affect YOU or where YOU live? Is YOUR home life going to be turned upside down? How long will this development take to completion? How would YOU like it, or even cope with it if this was going to happen opposite YOUR home, where you loved living as a direct result of living opposite a very calming healthy piece of land where nature occupies.

Before this development reaches completion you expect us to literally be overlooking a building site, with cranes, diggers, and a whole host of very noisy, large vehicles. Dirt blowing over into our homes/gardens / vermin etc.

Don't you think that this will directly impact on residents' health and wellbeing like mine and my neighbours for example? AGAIN, DO YOU CARE?

My understanding of any large organisation is that they have a corporate social responsibility to uphold SUSTAINABILITY as it's in the public interest to do so. Isn't environmental protection one of KMBC's responsibilities??? Yet this organisation will be responsible for removing this land from the green belt and destroying it. Is this not a huge contradiction?

I bought my house 3 years ago in 2011. The land search showed no development plans and yet a few months previous to moving in, a petition to save this land had been in action. Regarding this new development, this is the first letter I have received. Why have I not been informed sooner about this?? Going back to 2011, had I known about the development or should I say destruction of this natural habitat, I would have reconsidered buying my home directly opposite this green belt! I believed for a long time that Knowsley Council did care about its residents.....and now, I feel totally cheated!!

I'm sure it comes as no surprise that I am one of many, many residents OPPOSED to this development. We are joining forces and will try to save this unique and much loved/appreciated area of North Huyton.

Rachel

Knowsley Lane resident

**From:** Collin Johnson [REDACTED]  
**Sent:** 13 November 2014 23:14  
**To:** [REDACTED]  
**Subject:** Removal of Greenbelt land in Halewood.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Knowsley Council.

I object most strongly to the proposed of the removal of the greenbelt land in Halewood, and the proposed building of over 1100 houses here.

My main concerns are

1. There are already brown fields in the area which could be built on .
2. Loss of countryside and the effects on the wildlife .
3. The roads around the area are LANES and are not suitable for the increased traffic this would bring and with increased levels of pollution .
4. The character of the local area will be lost for ever.

Another concern I have is the process which the council have carried out this process so far . I have been living in the postcode of L35 for over 11 years now , and have never been informed by letter by the council, or local councillors of these developments. They allegedly have had public consultations, but nobody in the area has been aware of them , until 6 weeks ago , when the building proposals suddenly appeared on street lampposts . This has given the appearance that the council did not wish people to be made aware of their intentions, as they knew that the resistant's of Halewood would be against them .

I request that council re consider their plans for the area, and leave the greenbelt areas in Halewood alone .

Yours Sincerely

Mrs Rachel Johnson





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Ray Davis	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt Action Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CS1 to 5, AD51 and the SUE documents are out of step with Public opinion, I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill. I consider the council have not utilised empty properties and brown field sites in its calculations of housing needs. The council have not considered infrastructure improvements to cope with the influx of people.

Paras:

3.2to3.24, 3.26,4.10,5.44to5.51,5.82to5.86,5.133to5.138,5.156,5.157,5.159,5.177,5.179,5.181,5.183,5.184

See attached sheets

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Carry out an up to date housing requirement survey taking into account the latest figures from the Office of National Statistics, 2014.

Carry out a relevant up to date Traffic Management survey, taking into account the existing loads at peak times and the additional loads placed upon the area with an influx of at least 3000 additional vehicles.

Consider the impact on local services such as Doctor, Dentist, Schools, etc.

Insist that empty properties and brown field sites are developed before considering Green Belt release, and used to satisfy the 5 year plan. Brown field sites may well have the infrastructure already in place to cope with additional housing.

Put back any Green Belt release until end of plan period, and even then consider all other areas, green belt release should be the last resort, not the first action

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



ate 03/11/2014

## KNOWSLEY LOCAL PLAN: CORE STRATEGY

### Submission and Objections regarding proposed modifications

Ray Davis  
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

Implications for South Whiston and Prescot Town Centre – Please see my comments highlighted in red.

3.20 The appraisal concluded that the Spatial Strategy for Knowsley is likely to have a largely positive impact on the sustainability objectives. In Particular, it is envisaged that the Development Principles (CS2) are likely to have a major positive impact in the long-term on the objectives relating to health; mitigating climate change; and reducing the need to travel. It was concluded that the policies for Housing Supply (CS3), the Economy and Employment (CS4) and Town Centres and Retail (CS6) would have a positive impact on a range of objectives, particularly those that relate to social and economic issues and the appraisal also predicted that the policy for Green Infrastructure (CS8) would have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; adapting to climate change; and green infrastructure.

**I would question how removing green belt can have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; and adapting to climate change.**

3.21 The appraisal of the Proposed Submission document did however consider that a number of the policies would have an uncertain or negative impact on some of the objectives. For instance, it concluded that a number of the policies, such as the Spatial Strategy (CS1) and Green Belt (CS5) could have an uncertain impact on a number of environmental objectives in the longer term due to the potential for it to result in the release of a number of sites in the Green Belt.

**How can this statement hold true to statement at 3.20 one is negative and one positive?**

3.23 Nevertheless, the appraisal of the Proposed Submission document acknowledged that as each of the policies would result in built development and would therefore lead to some carbon emissions associated with the construction and operation of this development, their impact on the objective relating to mitigating climate change is uncertain. It also considered that there is some uncertainty over the impact of the policy for Knowsley Industrial and Business Parks (CS11) on the objectives relating to air quality and need to travel, particularly as there is limited information available on the amount and nature of the new employment uses that would be delivered. In addition, due to

both policies resulting in the provision of B1 office development in an out of centre location, the impact of the policies for Knowsley Industrial and Business Parks (CS11) and South Prescott (CS13) on the objective relating to the vitality and viability of Knowsley's town centres was also deemed to be uncertain.

**The actions contained within the Local plan are identified here as uncertain and would certainly fail in meeting our green credentials as the development of green belt out of centre would increase the carbon impact.**

3.24 On the whole, the appraisal of the Proposed Submission document concluded that the Thematic Policies performed well in the SA process. In particular, the policies relating to housing and the accommodation needs of the community (CS 15 – CS18) were considered to all have a positive impact on the objectives relating to poverty and deprivation; health and the provision of good quality housing; the policies relating to Sustainable and Low Carbon development (CS22) and Renewable and Low Carbon Infrastructure (CS23) were considered to have a major positive impact on the objective relating to mitigating climate change; and the policy for Greenspaces and Trees (CS21) was considered to have a major positive impact on the objectives relating to landscapes; biodiversity; adapting to climate change; and green infrastructure.

**How can this point be made as positive when the document already highlights the possibility of a negative impact on all of the CS range of reports?**

*Proposed Modifications to the Submission Local Plan*

3.26 The initial Local Plan Examination hearing sessions took place in November 2013. Following these hearing sessions, the Inspector appointed to undertake the examination issued his interim findings in January 2014. In response to these findings, and also to reflect other required amendments, the Council proposed a number of modifications to the Plan. These modifications included a revised approach to the release of Sustainable Urban Extensions, a reduction in the employment land target for the plan period, a reduced target level of affordable housing provision on sites in the urban area and the prioritisation of different forms of developer contributions in instances where viability is insufficient to fund all the non-mandatory requirements set out in the Plan.

**The reduced level of affordable housing can only be in the favour of developers, government guidelines call for a level of 25%. A reduced level of employment land means that the target of job creation must be flawed.**

4.10 The scale of any impact on an objective has been predicted taking into account the size of the site and the quantum of development it is likely to accommodate. In relation to housing sites, where an approximate number of dwellings that could be accommodated on a site have not been provided by the promoter of the site, its yield has been estimated based on the standard multipliers used for assessing the capacity of sites within the Strategic Housing Land Availability Assessment

(SHLAA) and the Green Belt Study. For sites in excess of 2 hectares in site size, this assumed a 75% net developable area and a density of 30 dwellings per hectare<sup>13</sup>.

**In the case of South Whiston, 75% of the proposed area of 110.3 hectares minus 27.6 = 82.70 hectares @ 30 dwelling per hectare is 2481 dwellings. The council have only declared 1503 dwellings. This calls all of the council's estimates of housing into question. The proposal to bring forward Green Belt release on such a scale will also produce many more houses than the SHLAA calls for. Also the government has in October 2014 told councils to use the NPPF to protect Green Belt.**

## **“Councils must protect our precious green belt land”**

From: Department for Communities and Local Government, Brandon Lewis MP and The Rt Hon Eric Pickles MP

First published: 4 October 2014 # Last updated: 6 October 2014

Part of: Improving the energy efficiency of buildings and using planning to protect the environment, Climate change, Environment and Planning and building

### *SUE 2c – Sustainable Urban Extension: South of Whiston and Land South of M62*

5.44 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the further modifications to the policy would remove the specific reference to housing in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require the development to provide a wider choice of housing in the area. Consequently, given the substantial capacity of the site, it is considered that the policy has the potential to have a positive impact on the objective of providing good quality housing and this impact would become increasingly significant as the development is built out. The policy also promotes a significant amount of employment development in this location and, due to the scale of development that would be delivered, could also encourage further investment in the area, generate employment and training opportunities in the construction sector and help sustain existing local facilities. As such, the policy could also have a major positive impact on the objectives that relate to business growth and productivity; and reducing unemployment; and some positive effect on the objectives concerned with poverty and deprivation; and education and skills.

**Any employment gains in the building industry are short term and will have little impact on local unemployment. With the reduction in affordable housing previously mentioned (3.26) how can the massive scale of over 2400 houses have a beneficial effect, without considerable investment in infrastructure. There are only two local primary schools, I question if they would have the capacity to cope with this massive**

development. Already in (3.21 & 3.22) the question of environmental and green space negative impacts have been mentioned, a development on this scale would surely cause a negative impact on all those areas mentioned.

5.45 The policy would also result in residential development being directed to a location that is within reasonably close proximity of established employment areas and a number of local facilities, including primary schools, a GP and health centre and a local shopping centre on Greenes Road. It also requires new development in this location to contribute towards public transport provision and improve links to Whiston railway station. As such, the policy could have a positive impact on the objectives that relate to improving access to services and amenities; and the use of more sustainable transport modes.

Local transport in Whiston is very poor and anyone who is not a car owner and lives on Windy Arbor Road, has already seen a reduction in buses available since de-regulation. To suggest building a large number of houses will increase local transport is naïve in the least and downright misleading. The development by Halton in Cronton has not seen a vast increase in bus traffic and hardly a bus is available late at night. The local shopping centre mentioned is log jammed at busy times with cars and deliveries by Artics to Tesco and the odd truck using Whiston as a short cut from Tarbock island. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.46 Given the scale of development promoted, the policy has the potential to generate a significant amount of additional expenditure which could support nearby local centres. As such, the policy has the potential to have a positive impact on the objective that relates to the vitality and viability of town and local centres. In addition, a key element of the proposals for the site is the creation of a country park with associated footpaths, cycleways and bridleways, and the policy also requires development in this location to encourage walking and cycling and provide public open space. As such, it is considered that the policy could support participation in sport and recreation and could therefore have a positive impact on the objective that relates to health.

Why it is necessary for so much land to be considered for removal from the Green Belt, to the south of the M62. Only about a third of this is reported to be for development. It has been said that the rest will form a Country Park, on the Old Cronton Colliery site. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.47 The policy would however have the potential to have a negative impact on a number of objectives. In particular, it directs development to a greenfield site that contains large areas of Grade 2 Best and Most Versatile agricultural land. As such, the policy would have a major negative impact on the objective that relates to protecting land and soil. Directing development to this location would also have a negative impact on the objective that relates to protecting landscape character;

and could have a negative impact on the objective that relates to biodiversity by resulting in the loss of priority habitat and/or by placing pressure on nearby Local Wildlife Sites. Nevertheless, there is only a low level of certainty about the impact of the policy on this objective.

**There is a clear admission here of the negative impact of taking this area out of Green Belt. With the increase in Global commodity prices locally produced food is more important. The need to remove Grade 2 Best and Most Versatile agricultural land from the Green Belt is not proven and 5.47 highlights the negative impact of this policy.**

5.48 The policy will result in development taking place in a location that is within reasonably close proximity to local facilities and would also require the development to contribute towards public transport, walking and cycling. However, the construction and operation of this development would inevitably result in carbon emissions and would inevitably generate a significant number of vehicular trips and associated emissions. Consequently, the policy has the potential to have some negative impact on the objectives that relate to mitigating climate change; and protecting air quality.

**There is a clear admission within (5.48) that the development proposed is identified as having a negative effect on carbon emissions and would certainly fail in meeting our green responsibilities. The mention of a significant number of vehicular trips bears out our belief that there would be a serious impact on traffic congestion within Whiston.**

5.49 The policy would also have an uncertain impact on some of the sustainability objectives. Specifically, the policy would result in development being directed to a location that is in close proximity to a number of heritage assets. Nevertheless, due to the scale of the site, there may be scope to incorporate an adequate buffer around these assets to protect their setting. In addition, the policy requires development in this location to comply with Policy SUE 2 which, amongst other things, requires new development to protect and enhance historic and architectural assets. As such, it is uncertain whether the policy would have a significant impact on the objective that relates to preserving and enhancing Knowsley's built heritage.

**These comments can only reinforce the need for a structured approach to any release of Green Belt and more time should be spent understanding all the issues before we take a decision that cannot be revoked.**

5.50 Although the policy directs development to a greenfield site which has the potential to function as part of the Borough's Green Infrastructure network, it also involves the creation of a country park and the requirement for development in this location to be subject to a master planning should ensure the appropriate retention and provision of objective that relates to providing and conserving green infrastructure is also considered to be uncertain. Areas of



Green Infrastructure. As such, the impact of the policy on the objective that relates to providing and conserving green infrastructure is also considered to be uncertain.

**(5.50) Again mentions uncertainty in the council decisions and in my view at least suggests they don't know what will happen when developers have free reign to build on our Green Belt. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.**

5.51 Similarly, although the policy would result in development taking place in the vicinity of a number of water bodies, there is limited certainty over whether this would impact on the water quality of these waterbodies. Consequently, it is considered that the policy would also have an uncertain impact on the objective of protecting, improving and where necessary, restoring the quality of inland, and estuarine waters.

**We have yet to see a definitive study of water quality after development, and we suggest the loss of some 110 hectares of open countryside will seriously impact local wildlife**

#### *KGBS 14 - South of Whiston*

5.82 Policy SUE1 identifies South of Whiston as a SUE primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development including the Local Wildlife Site but excluding Public Open Space. This option would not introduce any phasing restrictions but would include a policy requirement for ancillary facilities (e.g. Retail and Public Open Space). The second option considered was to allocate the site for housing development with site-specific allocations for retail and Public Open Space provision but no phasing restrictions. The third option was to allocate the entire site for housing development with no phasing restrictions.

**We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision.**

5.83 The appraisal concluded that each of these would have a similar impact on a number of the sustainability objectives. In particular, given the substantial capacity of the site, it concluded that each option could have a major positive impact on the objective of providing good quality housing and that this impact would become increasingly significant as the development is built out. However, by introducing a potentially inflexible approach to the provision of open space and retail, the appraisal recognised that Options 2 could have an adverse impact on the deliverability of the site which reduces the level of certainty that the option would have a major positive impact on the objective. Due to the size of the area and the quantum of development it could accommodate, each of the options could also generate a number of employment and training opportunities in the construction sector and

could stimulate further investment in the area. As such, the appraisal noted that each of the options has the potential to have a positive impact on the objectives that relate to reducing deprivation; skills and training; business competitiveness; and unemployment.

**Once again there is too much that is hopeful and of little certainty and i would re-iterate my previous comment. We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision. This decision is at odds with local Public opinion and also at odds with the localism bill.**

5.84 The appraisal considered that each of the options would also result in development taking place in close proximity to a range of local facilities and amenities including primary schools, a GP and health centre and a local centre on Greene's Road and development in this location could make a contribution to the continued viability of these services and facilities. Options 1 and 2 would also support the provision of certain facilities/amenities within the site. As such, each of the options could have a positive impact on the objective that relates to access to services and amenities but there is a higher level of certainty that Options 1 and 2 would have a positive impact on this objective due to these options resulting in the provision of facilities on-site. Given the significant capacity of the site, each of the options also has the potential to have a positive impact on Knowsley's town centres and the local centre on Greene's Road by increasing levels of expenditure in these centres. As such, each option could have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town centres

**The retail centres mentioned at Greenes Road is a small satellite and little could be done to expand it. Increasing the footfall would inevitably increase traffic in what is already a very congested area. An increase in local population will only put more pressure on what is an already stretched NHS provision.**

5.85 The appraisal did however recognise that each of the options could impact upon the setting and significance of a number of heritage assets and have a negative impact on the objective that relates to Knowsley's built heritage. These assets are however located towards the edges of what is a large site and there may be scope to incorporate an adequate buffer around these assets to protect their setting. Consequently, there is only a limited level of certainty that each option would have a negative impact on this objective. By resulting in the loss of a significant area of greenfield land and by potentially placing pressure on areas of ecological value, each option could also have a negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the

objective that relates to air quality. There is however a lower level of certainty that Options 1 and 2 would have a negative impact on this objective as both of these options would support the provision of some facilities on the site which could reduce the need to travel and associated vehicle emissions. Each option could also have a major negative impact on the objective of adapting to climate change; a negative impact on the objective of mitigating climate change; and an uncertain impact on the objective that relates to protecting water quality.

**Once again the councils own comments highlight the negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the objective that relates to air quality, and also increase congestion.**

5.86 Each option would result in the loss of a substantial area of greenspace, sections of which are used for informal recreation, and could therefore reduce opportunities for participation in informal sport and recreation and thereby have a negative impact on the objective that relates to health. Nevertheless, Options 1 and 2 would provide support for the retention/provision of areas public open space and could therefore have a positive impact on the objective. Conversely, Option 3 would not support the retention/provision of areas public open space and would therefore have a negative impact on the objective. Options 1 and 2 would also result in the provision of some facilities on the site which could help reduce the need to travel and have a positive impact on the objective that relates to reducing the need to travel and improving the use of more sustainable transport modes. By contrast, as Option 3 would not directly support the provision of on-site facilities, this option has the potential to have a negative impact on this objective.

**Once again the councils own comments highlight the negative impact on outdoor activities and recreation for local people.**

#### *CS5 - Green Belt*

5.133 The revised policy would have a largely similar impact on the sustainability objectives to the version of the policy included in the Core Strategy Submission document.

**The use of Green Belt for building is overwhelmingly opposed by the majority of residents. The reason used by the council for use and early release of Green Belt does not meet the NPPF in regard of the 5 purposes of Green belt and Extraordinary needs do not exist, to remove Best and Most Versatile agricultural land. It is also at odds with latest government thinking. See 4.10**

5.134 The policy would continue to protect the majority of Green Belt from inappropriate development but, as with the previous version of the policy, would support the identification of a series of sites for release from the Green Belt to ensure that there is sufficient housing and employment land to meet the needs of the Borough. However, the proposed modifications to the policy would mean that the release of these Sustainable Urban Extensions (SUEs) is no longer controlled by a phasing mechanism and the modifications would also result in these sites being allocated for development rather than just identified as broad locations. These modifications mean that the SUEs would now be more likely to come forward earlier in the plan period. As a result, many of the impacts that would have occurred in the longer term under the version of the policy included in the Core Strategy Submission document would now occur earlier in the plan period under the revised policy.

**The rapid release of Green Belt land can only be to the benefit of developers and will put back development of brown field sites. The council admitted at the hearing that early release of Green Belt will result in the delay of development of brown fields, and this too is highlighted by latest government thinking, see 4.10. The proposal to release Green Belt early is a poor decision not made in the best interests of local people. We will quickly see what a poor decision it was.**

5.135 By continuing to support the identification of SUEs and safeguarded land for housing and employment development the amended policy would continue to ensure that there is sufficient land to meet the Borough's development requirements. It is therefore envisaged that the revised policy would still have a positive effect on the objectives relating to poverty and deprivation; housing; the growth potential of business sectors; and maintaining high and stable levels of employment. However, as noted above, these impacts are now predicted to occur earlier in the plan period. In addition, by potentially resulting in the SUEs coming forward earlier in the plan period, the modifications to the policy could result in the SUEs competing with the Council's regeneration objectives for urban areas. As a result, the modifications to the policy reduce the level of certainty that it would have a positive impact on the objective that relates to poverty and deprivation.

**The proposal to release Green Belt early will impact on the council stated regeneration objectives. Little in the way of long term employment will come from vast housing estates, only a greater demand on roads, schools, GP's and a lowering of air & water quality with an increase in noise pollution.**

5.136 In addition, as the amended policy would result in some housing and employment development taking place in areas on a series of predominantly greenfield sites that are presently within the Green Belt, it could have a negative effect on the objective relating to land and soil and an uncertain effect on the objectives relating to landscape character and accessibility; and Green Infrastructure. Key mitigation measures to address some of these impacts will include ensuring new

development is built to an appropriate density, retaining areas of woodland, securing the provision of on-site open space, and securing appropriate landscaping to moderate the impact of proposals on the local landscape character.

**I have already called into dispute the density quoted by the council as the proposal in South Whiston and the Council average density of 30 dwellings per hectare is significantly above the information they have given the public and what they have consulted on. Consultation is 1503 against 2481 according to calculation using average density(4.10). Latest planning applications are far in excess of what the public were told, Recently Knowsley gave outline planning permission for 207 dwellings at Bank Lane, Kirkby (even though the site is still in the Green Belt). This is a difference of 76 dwellings, and represents a 58% increase on the capacity that Knowsley Council said the site had.**

5.137 As some of the SUEs are used for informal recreation and others contain sports pitches, it is considered that the revised policy could also still have a long term negative impact on health. The proximity of some of the locations to designated heritage assets and the presence of archaeological assets within some of locations mean that the revised policy would also still have an uncertain impact on the objective relating to built heritage in the longer term. It is also considered that the policy still has the potential to have a negative impact on the objective relating to biodiversity. Undertaking ecological surveys, excluding areas of priority habitat from the developable area and the provision of on-site habitats are all likely to be key mitigation measures. However, as noted above, these impacts are now predicted to occur earlier in the plan period.

**Uncertain impact on archaeological assets within the area will be compromised. We have not seen Ecological research to discredit the assertion that removing this area from Green Belt will not have a catastrophic effect. The modifications will bring the ecological disaster forward, so that we may see them before our Grandchildren do.**

5.138 The revised policy still would have the potential to result in more dispersed patterns of development. In addition, the construction and operation of the development that would be delivered on the SUEs would inevitably result in carbon dioxide emissions. Consequently, and notwithstanding the fact that the Knowsley Local Plan Transport Feasibility Assessment (2012) identified that some of these locations have good accessibility to bus routes, cycle routes and services and facilities, it is considered that the revised policy would still have an uncertain effect on the objectives relating to mitigating climate change; protecting air quality; and minimising the need to travel.

**This point is broadly supporting our ascertainment as to the detrimental impact on traffic within the area. Local People contest the accuracy of the Knowsley Local Plan Transport Feasibility Assessment (2012) as our research carried out by local people show more than 400 vehicles per 30 minute session at peak times and if deliveries took place to Tesco with Artic then the whole area became log jammed. Only one bus per**

hour was spotted until 7pm when the service stopped. We would assert that the transport assessment is out of date and not relevant to the increase in traffic we have seen and would call for another assessment to be carried out.

*CS14: Principal Regeneration Area – Prescot Town Centre*

5.156 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process. The revised policy would still direct investment to Prescot town centre and would seek to intensify its retail function, encourage a wider mix of uses and create a distinctive identity and a complimentary evening economy. As such, the revised policy would still have the potential to have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town and local centres. The amended policy wording does however remove some of the restrictions placed on retail development in Cables Retail Park. In particular, it is no longer specified that retail development within Cables Retail Park should provide for convenience or bulky goods retailing and should maintain the current retail floorspace capacity of the Retail Park. These amendments could increase the scope for further investment in the Retail Park and result in a consequential reduction in investment in Prescot town centre, particularly as the Knowsley Local Plan Economic Viability Assessment (2012) indicates that comparison retail in Prescot town centre is generally unviable in current market conditions. This reduces the level of certainty that the revised policy would have a positive effect on the objective.

**Prescot town centre is run down and irrelevant in retail terms, even the council have had to move offices to an ex pub at vast expense, just to fill another empty building. When the council allowed Tesco to build a massive supermarket at Cables Retails park it as good as sounded the death knell of Prescot town centre. (5.156) Broadly agrees with our assessment.**

5.157 By reducing the level of certainty that the policy would support investment in Prescot town centre, these proposed amendments mean that there is also a lower level of certainty that the revised policy would have a major positive impact on the objective that relates to protecting and enhancing Knowsley's built heritage.

**Not proved**

5.159 There are no anticipated negative effects on the sustainability objectives. The proposed modifications would not however prevent the policy from having an uncertain impact on the objective relating to mitigating climate change

**Not proved. Agrees with earlier points that state the policy with have a detrimental effect on climate change.**

5.177 The revised policy also still encourages the re-use of vacant and underused historic assets and states that favourable consideration will be given to schemes that enhance the importance of the asset for the economy. The policy could thereby result in the creation of premises for new businesses. In addition, protecting and enhancing buildings and features of historic interest should help create more attractive places to invest in and could lead to enhancements to Prescot town centre. Consequently, the amended policy would also continue to have the potential to have a positive effect on the objectives relating to poverty and deprivation; increasing the number of new businesses; enhancing the vitality and viability of town and local centres; and maintaining high and stable levels of employment and reducing long-term unemployment.

**Developers will not consider run down existing areas, whilst vast areas of Green Belt are available, which are considerably easier to develop.**

*CS21: Green spaces and Trees*

5.179 The proposed modifications to the policy would have some impact on the performance of the policy against a number of sustainability objectives. In particular, although the revised policy still seeks to resist new development which would result in the loss of greenspace and would provide support for the provision of new areas of greenspace, the modifications to the policy mean that it would now encourage the retention of existing trees and woodlands and the appropriate planting of new trees rather than require this. This amendment to the policy wording is considered to reduce the level of certainty that existing trees would be retained and new planting secured. Consequently, whilst it is considered that other aspects of the policy would ensure that it continues to have a major positive impact on the objectives that relate to landscape character and green infrastructure; and a positive impact on the objectives that are concerned with adapting to climate change; mitigating climate change; water quality; and air quality; it is considered that this modification results in only moderate certainty that the policy would have a positive effect on these objectives.

**Once Knowlsey has shown itself to be open to removing Green Belt from protection, future planning applications will use this behaviour to push for more releases. This is a slippery slope that Knowlsey council have embarked on which will create a borough which only has an ex tip and non-public green space.**

5.181 The revised policy would still seek to resist the loss of greenspace and would provide support for the improvement of existing public open spaces and encourage the provision of new greenspaces. It could therefore help provide opportunities for participation in sport and recreation which would have a positive effect on the objectives relating to health; and poverty and social deprivation. It is however recognised that the provision of opportunities for sport and recreation does not necessarily guarantee engagement in these activities and, as a result,

there is only a low level of certainty about the effect on these objectives.

**I would welcome the opportunity to see where Knowsley believe they can get new green spaces from? Also the council have overstated the positive impact on health, poverty and social deprivation that a vast estate of houses can have. It is more likely that this influx of residents could also increase anti-social behaviour.**

*CS22: Sustainable and Low Carbon Development*

5.183 It is envisaged that the proposed modifications to the policy for Sustainable and Low Carbon Development would have a number of impacts on its performance in the sustainability appraisal process. The amended policy still requires development to incorporate a range of measures which would improve its sustainability. Nevertheless, the removal of the requirement for new development to achieve particular Code for Sustainable Homes/BREEAM standards and the removal of the requirement for development to incorporate decentralised and low carbon energy, means that there is a lower level of certainty that the policy would have a major positive effect on the objective that relates to mitigating climate change. Similarly, by not requiring new development to achieve particular Code for Sustainable Homes/BREEAM standards it is considered that the policy is less likely to result in new developments which incorporate water conservation measures or make use of recycled materials. As such, the proposed modifications mean that there is a lower level of certainty that the policy would have a positive impact on the objectives that relate to minimising the production of waste and increasing recycling rates; and ensuring the prudent use of water and mineral resources.

**To remove the need for developers to meet Code for Sustainable Homes/BREEAM standards is another nail in the coffin of our councils green credentials. It is a bizarre decision at the start of the 21<sup>st</sup> century, particularly as we all face the prospect of climate change. The demand on energy, water and other resources is likely to be much higher.**

5.184 In addition, the removal of the requirement to achieve certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.

**Once again this point is totally at odds with other statements and shows that there would be a negative effect on the objectives that relates to poverty and deprivation; and health.**

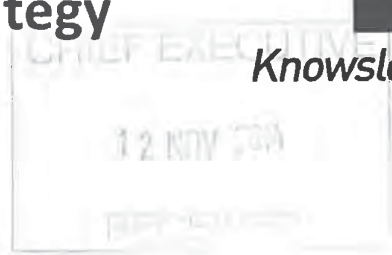




# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Ray Davis	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt Action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Whiston Green Belt Action Group

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
M065,

Policy Ref

SD32,  
SUE1,SUE2C

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CS1 to 5, AD51 and the SUE1, 2c documents are out of step with Public opinion,. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill. I consider the council have not utilised empty properties and brown field sites in its calculations of housing needs. The council have not considered infrastructure improvements to cope with the influx of people.

See attached sheets

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

Carry out an up to date housing requirement survey taking into account the latest figures from the Office of National Statistics.

Carry out a relevant Traffic Management survey, taking into account the existing loads at peak times and the additional loads placed upon the area with an influx of at least 2200 vehicles.

Insist that empty properties and brown field sites are developed before considering Green Belt release.

Put back any Green Belt release until end of plan period, and even then consider all other areas, green belt release should be the last resort, not the first action

Re-convene the public hearing due to the poor performance of the Council in letting the public know.

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 30/10/2014

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CSI to 5 and the SUE documents are out of step with Public opinion,. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states "Planners must protect our Green Belt"  
see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case. I note that under 'Housing land requirements and legal duties' the words from Government, in relation to maintaining a 5 year housing supply are 'advise' and 'should' (not 'instruct' or 'must'. The Council should ensure that brown field sites are prioritised, before any Green Belt release is considered.

I note that the numbers of dwellings to be built, and which subsequently make up the five year targets are set locally, by Knowsley Council (not the Government).

Knowsley say that the figure of 8100 new dwellings over the plan period (an ambitious figure, that is the real cause of all the problems) has been partly informed by household projections. Household projections for Knowsley between 2008 and 2028 (a time period greater than the plan period, but still with the same end date) gives a projected increase of 7000 dwellings. Knowsley state that this figure may be revised downwards, when new household projections are released by the Office for National Statistics. This is highly likely, given the revising downwards of the population forecasts for Knowsley, earlier this year. The Plan does then use the latest data.

The latest SHLAA (2012) identifies enough land in the urban areas of Knowsley for 5636 dwellings. Knowsley have adopted a cautious approach, with the identified sites, and the actual potential figure is a lot higher. A lot of these sites, whilst potentially able to accommodate housing are classed as 'undeliverable' within the 5 year supply period (due to various potential constraints, or timing issues). That is what the developers were able to persuade the Inspector of, during the public inquiry. However, by allowing building on Green Belt sites, it becomes less likely that the brownfield sites, in the existing urban areas, will be developed. There really does need to be a 'brownfield first' policy adopted by the Government.

In addition to the above, at April 2012 (latest figures available), Knowsley had 2020 homes registered as being empty. Bearing in mind that the 5636 figure from the potential housing supply could potentially be a lot higher,  $5636 + 2020 = 7656$ . Therefore at least 7656 potential dwellings are available, before any Green Belt release should be considered.

Also, Before any windfall sites (sites not considered as housing sites, but which subsequently become available), and there have been a lot of these in the past, are taken into consideration, and before the 'duty to co-operate' (where nearby local authorities such as Liverpool, with large areas of vacant and derelict land can potentially accommodate any unmet demand) is considered, I would reason that exceptional circumstances do not exist to warrant altering the Green Belt boundaries, in order to remove land from it.

Knowsley Council are making assumptions about housing targets, and planning for figures higher than those forecast by the Office for National Statistics. I believe that this 'predict and provide' approach, which is based upon an ambition, as opposed to an actual need, does not constitute exceptional circumstances. I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton.

Is Not consistent with National Policy

Mr R Davis



1/11/2014

Dear Mr Pike,

I would like to draw your attention to the latest guidelines regarding Green Belt. The Government Coalition, within the new National Planning Policy Framework (NPPF), published in March 2013 and carefully drawn up in the wake of wide-scale opposition to draft proposals, planners were specifically ordered to protect green belt land.

<http://www.telegraph.co.uk/earth/hands-off-our-land/9168036/Hands-Off-Our-Land-ordinary-countryside-to-get-more-protection-in-revised-planning-rules.html>

And, more recently, new rules came in to further strengthen green belt protections.  
From: The Department for Communities and Local Government and published: 16 October 2014

<https://www.gov.uk/government/news/new-rules-further-strengthen-green-belt-protections>

The latest Government guidance after the Mole Valley Inspection, now states that green belt boundaries should only be altered in "exceptional" cases and that housing targets do not justify the harm done to the green belt.


Read more: <http://www.dorkingandleatherheadadvertiser.co.uk/Victory-people-power-Mole-Valley-considers/story-23380414-detail/story.html#ixzz3HxHyC5KV>

And I would also draw your attention to the Reigate & Banstead inspection, which has been heavily criticised for the reasons used for Green Belt release. Please see article below.

<http://www.surreymirror.co.uk/Government-disturbed-findings-Reigate-Banstead/story-20768303-detail/story.html>

I would like to draw your attention to the fact that they Housing requirement uses out of date information in that the ONS has revised Population projections in 2014.

It is clear that the new rules within the NPPF instruct councils to ensure brown field sites are used before considering Green Belt and that Housing Quotas can't be used as an exceptional reason to release Green Belt.

I would also point out that Knowsley has over 2000 empty properties and over 5000 would be available from brown field locations. These would more than meet any 5 year requirement. Even now some local residents have only just found out about the Local Plan, with shows how poor the first consultation was. Recently  at Knowsley Town Council meeting admitted that the company the council used did not deliver all the pamphlets it should have.

We feel strongly that Developers have railroaded the inspection to decide on early release of Green Belt and to build on the last bit of Grade 2 BMV farmland in Whiston would destroy our community. We believe we would become just another Housing Estate wasteland for commuters to employment in other areas. I feel you would be the best person to advise us on how we further challenge any decision to build on Green Belt within our community after the Inspection has finished?

Yours Sincerely

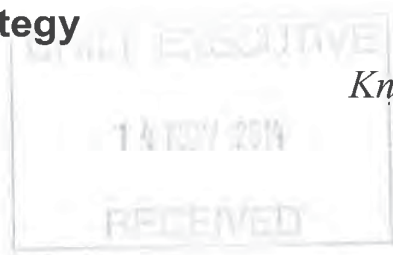
Ray Davis  
Chairman  
Whiston Green Belt Action Group



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

Knowsley Council



## RETURNING THIS FORM

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

## PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	Solicitor
Name	RAYMOND BEARD	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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**PART B - YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Save Knowsley Village Green Belt Group

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

I WOULD ALSO ADD THAT I DO NOT BELIEVE THE STRATEGY TAKES ACCOUNT OF THE HEALTH AND WELLBEING OF THE RESIDENTS OF THE VILLAGE. KMBL PLANNING DEPT. SEEM TO BE WORKING IN TOTAL ISOLATION WITHOUT REGARD TO NHS STRATEGIES. FURTHERMORE KMBL ARE SHOWING SCANT REGARD TO CURRENT NATIONAL THINKING REGARDING 'REGIONAL EMPOWERMENT' AND ASSOCIATED PLANNING STRATEGIES. HAVING SEEN RECORDINGS OF KMBL'S PLANNING TEAMS PRESENTATIONS I AM AMAZED TO SEE THE INSPECTOR BEING SHOWN AS INTRANSIGENT IN HIS THINKING ON 'BROWN FIELD' SITES, WHEN IT IS CLEARLY THE PLANNING TEAMS LACK OF PROGRESS IN THIS AREA OVER THE YEARS WHICH IS FORCING HIM INTO THIS POSITION.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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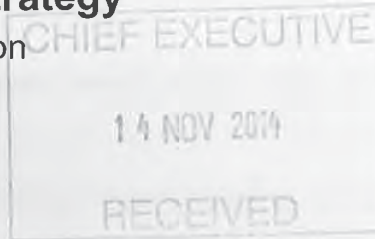


Date <sup>11<sup>TH</sup></sup>.....November 2014



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form



Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	Solicitor
Name	RAYMOND O'NEILL	Middleton Solicitors
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref  Policy Ref  Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

- a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.
- b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

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Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

THIS PROPOSAL WILL DO MORE HARM THAN GOOD IN TERMS OF DESTRUCTION OF THE PRESERVED LAND TO THE RESIDENTS, THE WILDLIFE, THE INCREASED TRAFFIC, THE LACK OF FACILITIES FOR DOUBLE THE AMOUNT OF PEOPLE AS WELL AS INCREASED POLLUTION TO OUR ENVIRONMENT.

TO DESTROY THIS ANCIENT LAND FOR HOUSING WOULD BE A TRAVESTY.

KEEP KNOWSLEY VILLAGE AS A VILLAGE AND DO NOT TURN IT INTO A TOWN.

WE NEED TO KEEP THE LOVELY VILLAGE OF KNOWSLEY JUST THE WAY IT IS.

Continue on a separate sheet if necessary...

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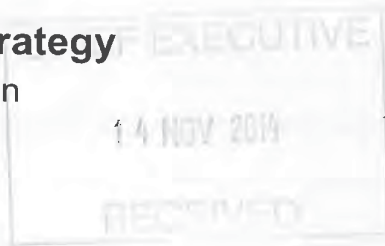
[Redacted Signature]

Date.....11th.....November 2014



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Proposed Modifications - Consultation  
Representations Form



Knowsley Council

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**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MR	Solicitor
Name	RICHARD GEORGE ROBINSON	Middleton Solicitors
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group ✓	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

Save Knowsley Village Green Belt Group

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |  | Yes                      | No                                  |
|--|--------------------------|-------------------------------------|
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Signature

[Redacted Signature]

Date: 11.11.14 November 2014



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Representations Form



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	Personal Details*	Agents Details*
Title	MR	Solicitor
Name	ROBERTS.	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

I WOULD LIKE THE VILLAGE IN WHICH ME AND MY WIFE LIVE IN TO STAY AS SUCH ITS BEEN A VILLAGE FOR HUNDREDS OF YEARS AND I BELIEVE IT SHOULD CARRY ON BEING SO +

*Continue on a separate sheet if necessary...*

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Signature...  .....

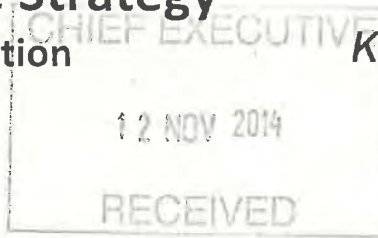
Date... 12 ..... November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



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**PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MR.	
Name	ROBIN TODD HUNTER	
Job Title (if appropriate)	RETIRED (SEMI)	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

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Modification Ref  Policy Ref  Paragraph Ref

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- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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YOUR PROPOSAL SERVED WITH NO INITIAL CONTACT WITH RESIDENTS OF THE AREA. IS SIMPLY ROLLED OUT OVER PEOPLE WITH NO CONSIDERATION WHATSOEVER FOR HOW IT WILL AFFECT BOTH THE RESIDENTS AND THE WILDLIFE, OURS AND MANY OTHERS. LIFESTYLE WILL BE DESTROYED BY SUCH ACTION. GOVERNMENT SAYS BUILD MORE HOUSES AND THE LIVES OF RESIDENTS ARE SIMPLY BULLDOZED OVER WITH NO CONSIDERATION OR SYMPATHY FOR SUCH ACTION. SO LONG AS ORDERS FROM ON HIGH ARE COMPLIED WITH.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

WE MOVED ONTO HALSWELL PARCEL TO GET AWAY FROM THE VERY ENVIRONMENT YOUR PROPOSAL WILL PUT US IN THE MIDDLE OF. THE BULLARDS NOW FIRMLY ESTABLISHED IN "SMALL WOOD" WILL LEAVE. THE SAME FATE WILL AFFECT THE PARTRIDGE, HEDGEOGS AND MANY OTHER BIRDS AND FORMS OF WILDLIFE THAT WE HAVE WATCHED AND SUPPORTED FOR THE PAST 25 YEARS. DOCTORS SURGERY APPOINTMENTS ARE ALREADY STRETCHED. WHISTON IS A VILLAGE AND IS REGARDED AS SUCH BY ALL WHO LIVE HERE. EVEN NOW TRAFFIC MOVEMENT IS A PROBLEM AT PEAK TIMES. YOUR ROAD PLAN WILL NOT CHANGE THAT.

*Continue on a separate sheet if necessary...*

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Signature

[Redacted Signature]

Date

1-11-14

[REDACTED]

---

**From:** Romilly Scragg [REDACTED]  
**Sent:** 13 November 2014 20:40  
**To:** Knowsley Local Plan  
**Subject:** Representation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Title - Ms

Name - Romilly Scragg

Address - [REDACTED]

Telephone - [REDACTED]

Email - [REDACTED]

**Further representations in regards to the Knowsley Core Strategy, in light of new information emerging (November, 2014)**

These notes form a representation regarding the emerging Knowsley Core Strategy, in respect of new developments, and the subsequent generating of new information since the sittings of the public inquiry (November 2013 and July 2014).

1. The land at Whiston and south of the M62 forms not only a barrier between the urban sprawl from St Helens and Liverpool but a welcome breathing space for Knowsley residents. It should be protected. Knowsley planners say any development proposals for South Whiston will be required to include "a network of public open space, cycling and walking routes in the site" and that the plan "proposes a new country park be created south of the M62 with enhancements to the Whiston to Cronton strategic green link". This is disingenuous in part (the latter part, as the country park is nothing to do with KMBC) and absurd in the other. "A network of public open space, cycling and walking routes" is paltry compensation for the loss of a large area of ancient, natural, open greenspace - and no compensation at all in terms of green barrier.

2. On Twitter by the Rt Hon Eric Pickles secretary of state for Communities and Local Government wrote: "Please remind planners that Councils must protect our precious green belt land". A press release issued by the Government in October 2014 reaffirms the Government's policy that "...once established, green belt boundaries should only be altered in exceptional cases, through the preparation or review of the Local Plan." When challenged on this, KMBC says the Inspector's Interim Findings "indicate that these exceptional circumstances justifying the alteration of Green Belt boundaries do exist in Knowsley". The inspector's findings were published before October 2014. Whoever's fault it was, the Government clearly believes too much Green Belt is being passed for development by inspectors who have been working to their earlier guidelines.

KMBC's director of regeneration [REDACTED] herself said more Green Belt had been developed in the past 5 years than in the 25 years before that.

It is clear that planners and planning inspectors are being encouraged to look again at circumstances they have previously accepted as "exceptional".

3. I gave evidence in my earlier representation that the public consultation was flawed at stages where the public could supposedly direct the basic design of the local plan in regard to loss of Green Belt. At the hearings, KMBC acknowledged thousands of leaflets had not been delivered. The inspector nevertheless found their consultation 'sound'.

In recent weeks and months, it has become abundantly clear that thousands of Knowsley residents did not know about the plan. 3,000 people have signed a petition. Hundreds of representations have been submitted and public meetings have been full to overflowing with residents who do not want their Green Belt taken away. I believe this matters. I believe that a council's consultation policy should be more than a box-ticking exercise. And I believe that what residents want to do with their home should be taken into account.

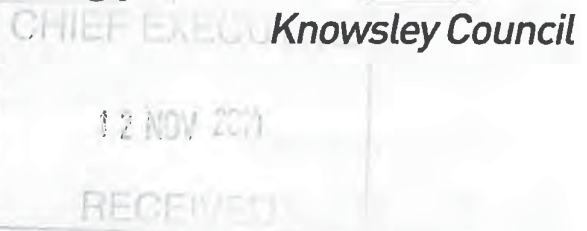
4. I urge the inspector to take particular note of the representation made by Paul Slater who has devoted inordinate amounts of time to checking over KMBC's findings. He is thorough and he is absolutely fair. He is not a full time planning consultant or planner. He does this off his own bat for the good of communities and for the countryside and for what is right.

Romilly Scragg, November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	RONALD PRESCOTT	
Job Title (if appropriate)	PRODUCT CONTROL	
Organisation (if appropriate)	CONVATEC	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

<sup>MOSS</sup>

Policy Ref

Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

THERE HAS NO BEEN ANY PROPER CONSULTATION WITH THE LOCAL PEOPLE  
THERE HAS BEEN NO CONSIDERATION FOR THE LOCAL GREEN BELT, WHICH WAS DEPLETED OVER THE LAST 30 YRS  
THIS PART OF MERSEYSIDE NO SHORTAGE OF WASTE LAND IN THE PRESCOT AREA.  
GREEN BELT IS THERE FOR PEOPLE TO ENJOY AND STOP URBAN EXPANTION.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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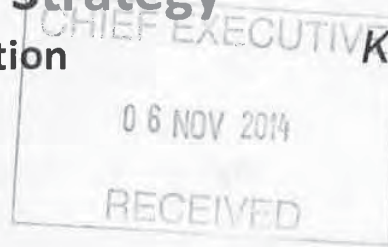
Signature [REDACTED] Date 1.11.14.



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	ROY HARDMAN.	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation MR R HARDMAN

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref WHISTON  
STH.  
MIGS. Policy Ref 1/2c. <sup>Suez</sup> Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

*Continue on a separate sheet if necessary...*

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- 1) INFORMATION SHOULD BE PROVIDED THAT A LAY PERSON CAN UNDERSTAND PLAIN / SIMPLE ENGLISH.
- 2) DUE TO THE LACK OF JOB OPPORTUNITIES WE FEEL MORE HOUSING IS NOT REQUIRED AS PEOPLE HAVE NO REASON TO MOVE INTO THE AREA.
- 3) DUE TO HISTORIC MINE WORKINGS THE LAND MAY BE UNSTABLE AND DANGEROUS TO BUILD ON.
- 4) THE DESTRUCTION OF THE GREENBELT / OPEN COUNTRYSIDE WOULD DESTROY THE HABITAT OF WILD LIFE ON THE PROPOSED LAND, I THOUGHT THE COUNCIL HAD A DUTY TO PROTECT WILDLIFE.
- 5) THE LOSS OF A TREMENDOUS AMOUNT OF GREENBELT / AGRICULTURAL LAND THAT PRODUCES FOOD.
- 6) THERE WOULD BE A MASSIVE STRAIN ON LOCAL INFRASTRUCTURE DUE TO OVER CAPACITY PUTTING MORE STRAIN ON SCHOOLS, DOCTORS, PUBLIC TRANSPORT AND THE NHS.

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

6/11/2014

UNACCEPTABLE HIGH DENSITY/ OVER DEVELOPMENT OF THE SITE WOULD LOSS THE OPEN ASPECT OF THE NEIGHBOURHOOD, REMOVING THE BUFFER BETWEEN WHISTON AND THE MOTORWAYS M57/62.

- 8) THE ROAD NETWORK IS ALREADY AT BREAKING POINT AT TIMES, MORE CARS WILL ONLY ADD TO THE CURRENT PROBLEM.
- 9) NEW HOUSEHOLDS ON GREENBELT LAND WILL CREATE NEW INCREASED CARBON EMISSIONS FROM INCREASED POPULATION, TRANSPORT ETC. ETC, WHERE THERE WAS ONCE GREENBELT. THIS IS CONTRARY TO THE GOVERNMENT'S POLICY TO REDUCE GLOBE WARMING.
- 10) INCREASE IN TRAFFIC WOULD INCREASE NOISE, POLLUTION AND INCREASE IN CO<sup>2</sup> GASES WHICH COULD EFFECT THE HEALTH OF THE POPULATION IN WHISTON.
- 11) COUNCIL SERVICES ARE UNDER STRAIN AT PRESENT, DUE TO BUDGET CUTS, INCREASING THE HOUSING STOCK IN KNOWSLEY WOULD ONLY INCREASE THESE PRESSURES.
- 12) I URGE THE COUNCIL NOT TO CONSIDER BUILDING ON THE GREENBELT OR FARMLAND BUT TO UTILISE THE NUMEROUS BROWN FIELDS SITES. THIS WOULD MORE THAN MEET THE CURRENT HOUSING DEMANDS IN THIS AREA.

WHEN GREENBELT LAND HAS BEEN DEVELOPED, ITS LOST FOR EVER.

  
6/11/2024.



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title <i>MR</i>		
Name	<i>S. B. Allport</i>	
Job Title (if appropriate)	<i>RETIRED FIRE OFFICER</i>	
Organisation (if appropriate)	<i>—</i>	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation S B, All Port

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref  Policy Ref EGBS14 Paragraph Ref E5

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I object to the removal of land at Whiston Green celt.  
to Build over 1500 Houses in Green celt land  
Versatile Grade 2. Agricultural land cannot  
enhance the green infrastructure.  
Every one of the options offered result in a large  
loss of open green spaces

*Continue on a separate sheet if necessary...*

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

ERIC PICKLES, ONS., INSPECTION

- a) take notice of int Eric Pickles comments on Green Belt land.
- b) take notice of ONS. on population.
- c) to have further public consultations regarding this matter.

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



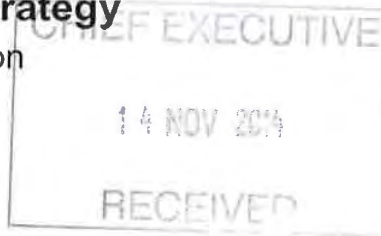
Date 01/11/2014



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation  
Representations Form

Knowsley Council



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## PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	Solicitor
Name	Drakefield	Middleton Solicitors
Job Title (if appropriate)	Retired	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Save Knowsley Village Green Belt Group

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS 6

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes No

a) Legally Compliant (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

**These representations relate to policy SUE1 and the link changes in policies CS2 & CSS**

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative



Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

*Continue on a separate sheet if necessary...*

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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature.

[Redacted Signature]

Date.....November 2014

If the Council's plans are allowed to go ahead, the beauty and character of Knowsley Village will be changed forever.

Remember it was that character and that beauty and the pride with which people held it, which was the reason its name was taken for the new "Knowsley Borough."

At that time it was a haven where people longed to live.

Since that time the Village has suffered, if the Council's plans go ahead there will be no going back, its old world rural character which the early council members appreciated will be gone forever!

Surely the Council can see that the keeping of what was once called "The Jewel in its Crown" is more important to the status of the whole borough than ruining all that made it special?

This area still retains some of its rural past which should be cherished in this age of excessive building and pollution.

Already the parking by locals and workers from the Industrial Park is often excessive outside of the shops on Sugar Lane.

Parking outside the school also on Sugar Lane becomes a real problem in the morning and afternoon, to a lesser degree there is also parking on Knowsley Lane at those times.

How much worse will it become with over 1000 more houses and yet more industry at the top of Knowsley Lane.

I believe we all have the right to breathe clean air and enjoy open space.

Regarding the changes already seen in the Village, in recent times we have noticed a change in the varieties of birds which visit our garden which has also been noticed by others.

Most significant is the complete lack of some finches and thrush which just aren't seen any more.

It is generally thought to have started with the spread of the Industrial Estate.

Taking away the Green Belt status of this village can only be detrimental to the lives of the residents, wild life and a village which is already suffering.

Buying a home here is already not the attractive investment it once was, it is said the most expensive properties aren't selling and the ex council properties just get snapped up by investors.

That's not a good situation, how much more difficult will it become with over 1000 more properties, we have all seen once nice areas can be ruined because of over, building.

Knowsley Borough needs the Green Space Knowsley Village provides, the roads and amenities will not cater for such a big increase in the population.

Also surely Knowsley Council can see can see the advantage of keeping its Borough, surrounded by Green Belt which its residents can and do, get out and enjoy.

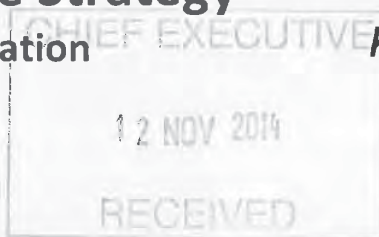
S Drakefield



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	miss	
Name	Sandra Harrison	
Job Title (if appropriate)	Retired	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

I strongly object as it will affect the wildlife such as Squirrels, Birds and Foxes we get squirrels in the garden and I like to feed them, it is nice to watch the antics out of them.  
and it is nice to see a bit of countryside in Whiston.

*Continue on a separate sheet if necessary...*

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I think it should be more publicized  
maybe more leaflets.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 1.11.2014

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



#### RETURNING THIS FORM

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Sarah-Jane Jarman	
Job Title (if appropriate)	n/a	
Organisation (if appropriate)	n/a	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Sarah-Jane Jarman

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

KGBS14

Paragraph Ref

ENTIRE  
PLAN

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

I do not feel that the plan is sound. The circumstances are NOT exceptional. Like many who actually live in Knowsley (unlike the planners), someone who pays council tax to Knowsley, works in the local area and has children in the local schools (unlike the planners) I can see there is actually very little greenbelt left within Knowsley.

Statistically your plan suggests that there will be a reduction of greenbelt less than 10% however using this misleading statistic cannot hide the fact that the MAJORITY of greenbelt within Knowsley is either in private hands (predominantly the estate of Lord Derby) and therefore not accessible by the local residents, or is providing a barrier to the 2 major motorways, several expressways/bypasses and many, many dual carriageways we have here (again not accessible).

This area is socially deprived; releasing greenbelt to providing housing for yet more social housing is not going to increase the coffers in the way (it would seem) the planners consider probable. There are many empty homes within Knowsley already (including South Whiston) and without green spaces, there will be no way of attracting the affluence Knowsley planning seem to be seeking.

There are few jobs in our area, more people mean there will be even fewer chances for work opportunity and this can only increase the social burden we carry within Knowsley already.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Eric Pickles Secretary of State for Communities and Local Government has been vocal in his advocacy for protecting our greenbelt, you have continually chosen destruction of the greenbelt over the correct and legal option of developing brownfield sites (of which there are MANY) in this area. The plan can be changed to reflect this – yet the ‘soft’ option has been chosen in every case.

Social aspects MUST be considered. As the developers already own the land, you releasing it will ensure they get their diggers in as quickly as possible, however you have failed to put the infrastructure in place to support this. There are inadequate facilities in respect of schools, roads and healthcare, an up-to-date survey MUST be completed in respect of traffic, CCG (GP) waiting lists and access to schools, particularly secondary. The old surveys quoted in the plan are now more than obsolete and must be repeated.

There must be more employment opportunities to ensure that Knowsley does not become even more deprived with even higher levels of poverty, releasing greenbelt will not aid in this.

The consultation has been woeful – your own staff in ‘One-Stop’ shops were unaware that they had the information to provide to people, so how could the public be informed? A proper consultation of the people of Whiston MUST be undertaken, the links on the website must be available at all times (your link was down for the first 3 weeks of the consultation process) to allow residents their say, which is why local residents had to take their own time and money to print hard copies of the forms for their neighbours.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



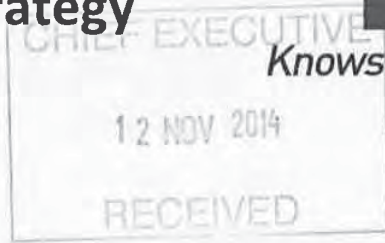
Date

12/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	SIDNEY MUCHMORE	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

SIDNEY MUCKHOICE.

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

MO 55 to  
MO 65

Policy Ref

CSI POL 55  
SUE ADS1  
SD 32.

Paragraph Ref

3.20-321  
323-324  
326-410.

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

THE LOCAL PLAN IS UNSOUND DUE TO THE FAILURE OF THE COUNCIL TO CARRY OUT ADEQUATE CONSULTATION WITH THE PUBLIC. SOME RESIDENT HAVE ONLY JUST FOUND OUT ABOUT THE PLANS. I WOULD MAINTAIN THAT THE POLICES OUTLINED IN CSI TO ADS1 AND THE SUE DOCUMENTS ARE OUT OF STEP WITH PUBLIC OPINION. I WOULD ASK THAT THE PUBLIC MEETINGS WITH THE INSPECTOR BE RECONSIDERED TO TAKE INTO ACCOUNT THE VIEWS OF LOCAL RESIDENTS AND STATED BY THE COUNCIL IN THE LOCALISM BILL. I CONSIDER THE COUNCIL HAVE NOT UTILIZED EMPTY PROPERTIES AND BROWFIELD SITES IN ITS CALCULATIONS OF HOUSING NEEDS. AND THAT THE COUNCIL HAVE NOT CONSIDERED INFRASTRUCTURE IMPROVEMENT TO COPE WITH INFUX OF SO MANY RESIDENTS

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

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- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature [REDACTED] Date 1st Nov. 2014

[REDACTED]

---

**From:** Simon Brown [REDACTED]  
**Sent:** 07 October 2014 17:15  
**To:** [REDACTED]  
**Subject:** Plans to build on greenbelt areas in Halewood Village.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir / Madam

I wish to voice my opposition at the building of housing developments in the greenbelt areas of Halewood. Not enough consultation has been sort from those in the village, who will ultimately be affected by this. Not only those who live close by.

Therefore, I wish for a greater consultation before these plans are granted.

Regards

Simon D Brown

[REDACTED]

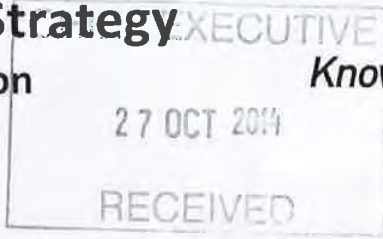
[REDACTED]



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	STEVEN GRANITE	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

KNOWSLEY VILLAGE GREENBELT REMOVAL

Modification Ref  Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

- ORMSKIRK ROAD FLOODS REGULARLY. REMOVING ACRES OF GREEN BELT LAND DIRECTLY FACING WOULD INCREASE FLOODING

- THE ROAD IN/OUT OF THE VILLAGE IS ALREADY CONGESTED WITHOUT AN ADDITIONAL 1,093 HOMES. DOCTORS/SCHOOL INSUFFICIENT.

- WHY DOUBLE THE VILLAGE POPULATION WHEN THERE ARE TOWNS ACROSS KNOWSLEY MORE SUITABLE FOR DEVELOPMENT

- THERE IS LOTS OF WILD LIFE ON THAT LAND THAT NEEDS PROTECTION?

- ORMSKIRK ROAD IS THE ONLY ROAD IN KNOWSLEY SUITABLE FOR LARGE BUSINESS OWNERS TO LIVE LOCAL - YOU ARE DRIVING THEM AWAY

- THE VILLAGE IS OLDER THAN LIVERPOOL CITY CENTRE, GREENBELT LAND IS THERE TO PROTECT HISTORIC NATURE - WHY REMOVE IT!

Continue on a separate sheet if necessary...

- LACK OF CONSULTATION. I PURCHASED MY PROPERTY IN JULY 2014 AND NO MENTION OF THIS PENDING ACTION. THIS WILL COST ME SUBSTANTIAL MONEY AS PROPERTY WILL DE-VALUE.



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- USE ALTERNATIVE LAND. LEAVE KNOWSLEY VILLAGE AS A VILLAGE!
- KNOWSLEY VILLAGE ATTRACTS GOOD PEOPLE THAT THE BOROUGH NEEDS MORE OF - DON'T DRIVE THEM OUT!

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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a) No, I do not want to participate at any further public hearing

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Signature

Date

22/10/14



# Knowsley Local Plan: Core Strategy

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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	N/S	
Name	SUSAN ADDY	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

RGB S14  
RGB S14

Paragraph Ref

E1

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

E1 is not sound because there are a lot of dog walkers in the Whiston area, a good percentage are elderly, and this is the only area they feel safe in whilst having some regular exercise which benefits the dog as well as the walker. It would also affect lots of wildlife that this area is privileged to have. Green belt should remain green at all costs as air pollution will be affected if the area is built up. The area at present is also well looked after by the residents. Whiston is a village and should stay a village.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

What should be considered is views and recommendations of local councillors who are the eyes and voice of the local residents ie KM Eric Hillier.  
Local people need to be consulted from the on set → statistics need to be proved not guessed or orchestrated to fit the wrong purpose.  
The Inspector should delay the release of green belt sites until all brown field sites have been considered & used for development.

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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Signature



Date

1/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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#### **PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mr	
Name	Thomas Roberts	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	██████████	
Postcode	██████	
Telephone Number	██████████	
Email Address	████████████████████	
Preferred Method of Contact	email	

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M078,  
M168 and  
M272

Policy Ref

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

My representation relates to the modifications Schedule References M078, M168, M272 and the Core Strategy Policies Reference: CS5, SUE1, SUE2. Specifically relating to the alterations of the Green Belt Boundary to the Land at Edenhurst Avenue.

- Reviewing the councils 'existing gap' in housing requirements this equates to 6288 with the target plan of 8100 presenting a shortfall of 1812. The existing proposals for the early release of green belt proposed in these modifications equates to an additional 3221 houses across 7 areas in Knowsley (excluding 1093 reserve in Knowsley Village). As such these proposals now represent a surplus of housing within Knowsley. The current target plan for Knowsley of 8100 houses is already a reduction from the previously proposed 10,000. Once again showing the demand for housing is dropping not increasing. So the council cannot justify doubling the supply of housing (3221) when the shortfall is only 1812.
- Whilst the shortfall needs to be met but the early release of the Green belt to all these areas particularly the development at Edenhurst cannot be justified. The council need to review these figures as releasing this volume of Green Belt land will present a large proportion of the housing remaining vacant. I would propose that the smaller areas of the Green Belt be retained as Green Belt at this time with them being reviewed in line with the Councils existing proposal of 2028.

Cont;

- The council own review of the residential development at Edenhurst is roundly met with strong public and other stakeholder objections as stated within your 2011 Consultation report dated December 2011. The main drivers and benefactors to this development would only be the developer and current land owner once the designation of the land changes to residential use. This Green Belt release presents a huge 'Windfall' to the developer to the detriment of Bowring Park and its residents. The council should be preventing this Windfall development and enforce the issue that the use of the site needs to remain for Green Belt use, and Urban Greenspace and Educational Land. The council have no facilities in this region of Roby to serve the existing residents and the proposal to increase residential numbers by any amount is adding excessive pressure on recourses in this region of the council. The council heavily relies on recourses within Liverpool, namely, school, nurseries, doctors, transport etc to service this area of Knowsley. The council should be increasing its recourses of services of this nature to improve the area.
- The resources within Liverpool, particularly the school are already oversubscribed. The local primary school, St Paschal Baylon is already currently under consultation to increase its capacity. However this potential capacity increase is to accommodate the existing residential developments that have taken place in Liverpool and not future development. Have the council sort the consultation of the local services that would be further drained by any additional development on Edenhurst.
- The council propose that the number of residential premises to be developed at Edenhurst is 86. The council have failed to justify the early release of this site based on the minimal amount of impact this will have in delivering the requirements of the Core strategy in meeting the housing needs. This is compounded by the fact that the council are proposing a surplus in housing should all the proposed Green Belt land be released.
- The location of the Edenhurst site is not only an area of Greenbelt land, the site is also directly bound by Liverpool and Knowsley boundaries. Release of this area of green belt goes against the central purpose and principals of Green Belt land. It would result in the complete erosion of **ANY** boundary between Knowsley and Liverpool. The essential retention of this boundary should not be considered for release by the council under any circumstances. The potential implications on the existing area will have a huge detrimental effect to the value the residents of Bowring Park place on this natural break in council boundaries. There are very few areas in Knowsley where residential properties adjoin residential premise of neighbouring councils. The council should not be adding to this situation and the release of Edenhurst Green belt will add to this situation. This once again goes against the principals of the Green Belt and as such the council cannot justify it release.

*Con't;*

- The nature of this area of Bowring Park means that any proposed alterations to the designated use of Edenhurst Greenbelt land should be advertised to the residents of Bowring Park. This has not taken place. Any residential development would result in the additional use of the roads effectively through two roads on the estate, due to the access onto the main road. The council have informed me that the current consultant process has been issued to people with a 200m radius, (or 200yard, when I asked for this information the council staff when not certain whether it was meters or yards). However the impact of such a change in the designated use should be reported to residents that are directly impacted by these proposed changes. The fact that they haven't presents a failing in the consultation process for this site. The specific logistical nature of Bowring Park means that the council have not appropriately consulted on this development. If the site was not 'land locked' then the 200m rule would suffice, but in the case of Edenhurst the council have acted inappropriately presenting a flawed consultation process.
- Having reviewed the areas of proposed land to be developed by the council both Greenfield and Brownfield why have the council not proposed development of the underutilised area of land by Roby Community Centre on Merton Crescent/Arnside Road. This is a larger site than Edenhurst as the proposed 86 house could be developed leaving green space and it does not have the disadvantages of Edenhurst as it is not in a location that will erode the boundary of councils and will allow further expansion should the council need additional housing in the future.
- As the council have stated within your own documents the residential gains of this site in meeting the council's objectives would have 'Relatively Small Capacity in meeting the councils housing figures is minimal'. The council are failing the residents of Bowring Park and the benefit gained by the council does not outweigh the benefits to the residents of Bowring Park.
- The council themselves state that the Green Belt boundary is to provide a clear and defensible Green Belt boundary – The proposed development at Edenhurst is in clear conflict to the core principal of the Green Belt at it will merge the boundaries of Liverpool and Knowsley with residential premises being located either side of the council boundaries.
- The council in this consultation process have reviewed the Green Belt release to cater for the suggested shortfall in residential premises. However the council have not undertaken a current/updated assessment on the development of the Brownfield sites that have become available since its last review. The council should be undertaking an updated review of the Brownfield site prior to releasing any Green Belt. The council have failed to satisfy this obligation, prior to commencing the Green Belt Consultation, the consultation is flawed.
- The consultation process and proposed alterations do not suitably/adequately rectify the rebalancing of housing in Kirkby. The councils proposed Green Belt release should have fully considered this situation to appropriately address these issues, and not put forward Green Belt release of sites where the only benefit would be the Windfall the developer gets should the council allow the release of the Edenhurst Greenbelt.

*Cont;*



- The council have failed to provide evidence as to why they have chosen to bring forward the Edenhurst Green Belt from the original review of 2028 particularly as the current housing demand figures provided by the council confirm that there is no justification for the early consideration of the release of the Edenhurst Greenbelt.
- As the historic use of the Edenhurst site is recreational/sports grounds facilities, the council have failed to undertake a updated review of the Open Space, Recreation & Sport Needs Assessment and Strategy as this was undertaken some 10 years ago, during which time numerous facilities have been developed on and as such the council are required to undertake an updated assessment to establish if there is a need for Edenhurst to remain as a recreational facility.
- The site has historically been utilised for agriculture use. The site retains its properties for such use and should the land not be used for its current designated use then it should be used for agriculture use in keeping with the use of the adjacent land.
- Whilst the land at Edenhurst is within a Green Belt area it has a designated usage for Urban Greenspace and Educational Land. The council are proposing a change of use to Residential. This change of use requires planning consent and as stated above the logistical nature of the site and the impact it will have on the two main road feeding this site and any proposed development of this size should be undertaken with the full consultation of the residents of Bowring Park due to the direct impact it will have on its residents. As a minimum the residents of Bowring Park Avenue and Rimmer Avenue (and to a lesser degree Court Hey Road) should have been advised of the consultation process and as such the consultation process for Edenhurst is flawed.

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

Obviously as stated above I do not believe that the council have conducted a legal/sound consultation process, particularly in relation to the Edenhurst changes.

As stated above the complete erosion of the Green Belt boundary with the boundary of Liverpool presents major concerns going forward as to the proposals any developer could make with the potential to form a road into the Liverpool boundary which in turn would create a rat run through Bowring Park estate from Bowring Park Road through to Sarum Road/Childwall Valley Road. The impact of this cannot be understated as I am sure you are aware. If the council must release this site for whatever reason (although again reviewing the document available I do not believe you have justified its early release from Green Belt). I would suggest that the council take the opportunity should they need to redefine the boundary to retain a band of Green Belt land (say 5m wide) running the length of the boundary to ensure control is retained by the council between the boundary of Liverpool and Knowsley. I believe that this would go some way to alleviating the fears of the Bowring Park residents and the potential detrimental impact a rat run would create.

(thank you for your time in reading this, hopefully the matters raised are fully taken into consideration).

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date: 13<sup>th</sup> November 2014

**From:** Tina Cinnamond [REDACTED]  
**Sent:** 13 November 2014 23:22  
**To:** [REDACTED]  
**Subject:** Objections to proposed plans KGBS 14 South of Whiston

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mrs Tina Cinnamond  
[REDACTED]

I am objecting to the proposed building of houses on the Whiston Greenbelt Land based on the following reasons.

Firstly, I would like to state that I do not think that I was properly notified of any consultations or public meetings about any of this proposal until it was brought to my attention by reading about it on social media. Knowsley council have stated that they leafletted within 200 metres of the proposed site. However, some people in these areas have not been informed at all.

It has been due to local volunteers posting leaflets and forming a committee that people have become aware of the proposals and as a result of this I do not feel that we have had the proper consultation period and the time to be able to ensure that everyone can state their views.

S1 and S7 The comments say that jobs will be created in the construction industry in this area if this plan goes ahead - how do we know without any kind of detailed plans that the work in the construction sector is going to be done by local construction contractors and not by outside Construction firms. we have not been told anymore about this. Also S7 states that training opportunities could be generated for locals however, there is limited certainty to this until detailed proposals are developed. These two comments contradict each other, how can you create jobs in the area without training when you dont even have detailed plans yet.

S2 Whiston is a small village, with an extra 1500 houses it is going to become a town. How can Whiston facilitate another added population of at least 3000 more people. Our schools do not have much more space, our GP surgeries are already under immense pressure with appointment times and waiting times not ideal at the moment without the added increase of population. Whiston hospital average A and E waiting times are 4 or more hours now. How can any building of houses improve this amenities. It will only increase the pressure that is already being put on our education and NHS services at present.

I am a governor at a local school and I cannot see the major benefits to our school. We are not full to capacity but will not be able to cope with many more children before the school becomes full to capacity. When all of the local primary schools are full people will send children out of the borough to schools or it will become more competitive to be admitted into a school. This is all going to increase pressure on our already overstretched education system.

We have repeatedly been told that Knowsley Council have consulted schools, GP surgeries and the NHS hospitals. However, we have not seen any proof of this.

S4 How can Knowsley Council ensure Community Involvement in decision making when we have had very little say in this major decision. As stated above, if it was left to Knowsley council only very few residents would have been aware of this proposed development. Is this not a blatant contradiction to what they are telling us.

S8 At meetings I have attended all of the ancient woodland, lakes are included on the proposed plans. However, we only have hearsay that these are staying, how can this be certain without a detailed plan. If these are left then local people will not be allowed access as freely as they do now. Surely these should be protected.

E1-E11 Knowsley have clearly overestimated housing need for the next 5 years. They state that population will increase and this is why the need for houses to be built. However, figures show that Knowsleys population has been decreasing for the last 50 Years. Why are the figures so much out?

Government guidelines dated 6th October 2014 state that Greenbelt Land should only be used in exceptional circumstances. If population has declined what is the exceptional circumstance for housing to be built on this greenbelt. We have plenty of Brownfield sites within Knowsley that could be used for building houses on instead of being an eyesore.

Our Greenbelt includes agricultural land, ancient woodland, lakes, wildlife and lots of open space. It is a place to walk and de-stress which a clear way to tackle health and wellbeing issues and obesity. It is a place for children to learn about nature and wildlife with first hand experience of this within the natural habitats.

The heavy machinery and building works is going to have a negative effect on our birds, bats and other wildlife. Wildlife has been undisturbed on this land for many years and creatures and animals such as foxes and various birds and hedgehogs are seen in this area. One of the roads is Foxes Bank Lane and we have a big wooden sculpture at the cemetery. All of these animals habitats are going to be destroyed if not by the actual building work by the noise and pollution in the area. These creatures have took many years to build homes and produce offspring which will now be destroyed. Wildlife and animal activity may not return back to these places for many years to come. This is going to have a detrimental effect to our environment.

Traffic on Tarbock island presently is outrageous without the added increase of extra traffic. Peak times see the roundabout totally jampacked with traffic at present. The extra traffic is going to make this area dangerous, will increase pollution and destroy what little green environment and wildlife we may have safety, health problems for people with respiratory conditions and increasing vehicles on our roads is going to increase road traffic collisions.

Me and my family moved into the area 15 years ago because of the greenbelt land for the use of our future children/Grandchildren etc. When we moved into the area we moved into a new build house. For the first 2 years we did not have a bird in our garden, we didnt see any signs of wildlife or anything.

Please could you take all of my objections into account please.

I would like to participate in any further hearings should we have them.

Mrs Tina Cinnamon

[REDACTED]

---

**From:** Tina Cinnamond [REDACTED]  
**Sent:** 13 November 2014 23:29  
**To:** [REDACTED]  
**Subject:** KGBS14 - Land South Of Whiston - Policy References SUE1 SUE2C

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Friends Of Halsnead Allotment Group

[REDACTED]

[REDACTED]

Firstly, I would like to state that we do not think that we were properly notified of any consultations or public meetings about any of this proposal until it was brought to our attention by reading about it on social media. Knowsley council have stated that they leafletted within 200 metres of the proposed site. However, some people in these areas have not been informed at all.

It has been due to local volunteers posting leaflets and forming a committee that people have become aware of the proposals and as a result of this we do not feel that we have had the proper consultation period and the time to be able to ensure that everyone can state their views.

E1-E11 Knowsley have clearly overestimated housing need for the next 5 years. They state that population will increase and this is why the need for houses to be built. However, figures show that Knowsleys population has been decreasing for the last 50 Years. Why are the figures so much out?

Government guidelines dated 6th October 2014 state that Greenbelt Land should only be used in exceptional circumstances. If population has declined what is the exceptional circumstance for housing to be built on this greenbelt. We have plenty of Brownfield sites within Knowsley that could be used for building houses on instead of being an eyesore.

Our Greenbelt includes agricultural land, ancient woodland, lakes, wildlife and lots of open space. It is a place to walk and de-stress which is a clear way to tackle health and wellbeing issues and obesity. It is a place for children to learn about nature and wildlife with first hand experience of this within the natural habitats.

The heavy machinery and building works is going to have a negative effect on our birds, bats and other wildlife. Wildlife has been undisturbed on this land for many years and creatures and animals such as foxes and various birds and hedgehogs are seen in this area. One of the roads is Foxes Bank Lane and we have a big wooden sculpture at the cemetery. All of these animals habitats are going to be destroyed if not by the actual building work by the noise and pollution in the area. These creatures have took many years to build homes and produce offspring which will now be destroyed. Wildlife and animal activity may not return back to these places for many years to come. This is going to have a detrimental effect to our environment.

At our allotments we teach children how to protect the environment and do work on recycling and conservation issues. We are teaching children to do this and now we are having our greenbelt removed. The children will learn skills but not have anywhere to use these skills firsthand

Friends of Halsnead Allotment Group



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



## RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- > By email: [LocalPlan@knowslev.gov.uk](mailto:LocalPlan@knowslev.gov.uk)
- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annex, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

## PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	VALERIE O'NEAL	Middleton Solicitors
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Save Knowsley Village Green Belt Group

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

These representations relate to policy SUE1 and the link changes in policies CS2 & CSS

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

KNOWSLEY VILLAGE IS AN ANCIENT SITE NOTED IN THE DOOMSDAY BOOK WHICH IS OLDER THAN LIVERPOOL AND A HERITAGE SITE WHICH SHOULD BE PRESERVED FOR FUTURE GENERATIONS.

THIS PROPOSAL WILL HAVE A LASTING DAMAGING EFFECT ON THE ENVIRONMENT, THE SURROUNDING ROADS AND TRANSPORT WHICH IS DETRIMENTAL TO OUR VILLAGE. THE WILDLIFE NEEDS TO BE PROTECTED AS DOES OUR ANCIENT VILLAGE.

THE RESIDENTS PURCHASED PROPERTIES BECAUSE OF THE ENVIRONMENT AND BEAUTY OF THE SURROUNDINGS WHICH HAS TO BE PRESERVED.

A THING OF BEAUTY IS A THING TO BEHOUD !!

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

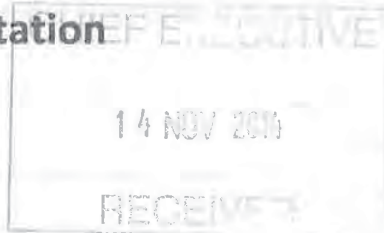
Date...11/11/14...November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014**. **Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MISS	
Name	WENDY MORAN	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

*Wiltshire Green Belt*

Modification Ref

Policy Ref

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

*Continue on a separate sheet if necessary...*

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

We / I want to preserve the greenbelt in Whiston for our future generations. To preserve our greenbelt history + wildlife. It will be lost forever if we do not save it.  
There are lots of brownfield sites within the Knowsley Borough which are not build on. The council appear to have given a disregard to preserving the greenbelt instead want to focus on commercial gain/political gain.  
They also disregard the health + safety of the residents as the proposal of 1500 houses on Whiston greenbelt with an estimated increase in 4,000 people living here, will dramatically

*Continue on a separate sheet if necessary...*

Please turn over

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature 

Date 12/Nov/2014

increase accidents on the road + in built-up areas such as Whiston Village, which appears to be a full capacity now.

There will be an increase in noise + air pollution, affecting people's health - physical + mental.

Increase in crime + road traffic incidents.

Pressure of local health services, which are at bursting point.

The route to local town Prescot has two routes to travel by road e.g. over Whiston (Roper bridge) + up Cross Lane or Dragon Lane.

Cross Lane in particular has double parked cars and is now hazardous, so it will not cope with another 4,000 people from 1,500 new homes.

The council seem to have sprung these plans on local residents and we feel we are being misled.

We feel the information has been hidden from us, until the last minute.

We feel we have been unfairly informed and not given ~~another~~ enough alternative options, to save our green belt.

12/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	WILLIAM HALVORSEN	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I BELIEVE THE CONSULTATION PERIOD AFFORDED THE RESIDENTS OF THE PROPOSED AREA OF DEVELOPMENT HAS NOT FULFILLED THE REQUIRED TIME SCALE, AND THEREFORE NOT LEGALLY COMPLIANT OR ANY DEGREE OF SOUNDNESS.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I BELIEVE A STRUCTURED MEETING SHOULD BE ARRANGED WITH A MEMBER OF CENTRAL GOVERNMENT, IDEALLY THE MINISTER WHO APPROVED SUCH A SCHEME. IT SEEMS OUR LOCAL GOVERNMENT REPRESENTATIVES ARE EITHER INCAPABLE OR HAVE LIMITED CAPACITY TO CARRY FORWARD THE EXPECTATIONS OF THE LOCAL COMMUNITY.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1st Nov 2014



### 03 DUTY TO COOPERATE

#### Representations specifically relating to Duty to Cooperate issues

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
DUTY TO COOPERATE 001	2	128	Alan McNab (1)
			Alan McNab (2)
DUTY TO COOPERATE 002	1	160	Bess Smith
DUTY TO COOPERATE 003	6	247	Gary Davis
		279	Irene Davis (1)
		442	Nicola Davis
		96	Ray Davis (3)
		544	Sylvia Jones
		548	Thomas Jones
DUTY TO COOPERATE 004	1	359	Keith Wooding
DUTY TO COOPERATE 005	4	364	Kirsty Meredith
		444	Nicola Meredith
		468	Paula Meredith
		94	T W Bretherton
DUTY TO COOPERATE 006	1	436	Natasha Muirhead
DUTY TO COOPERATE 007	1	96	Ray Davis (2)
<b>Total</b>	<b>16</b>		

**From:** Alan McNab [REDACTED]  
**Sent:** 14 November 2014 11:32  
**To:** Knowsley Local Plan  
**Subject:** Objections to proposed development of land - Whiston South  
**Attachments:** Knowsley-Local-Plan-Representations.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs,

Please find attached local plan representation forms containing my objection to the disgusting profiteering sale of green belt land in Whiston South, and the ridiculous proposal to build over 1500 houses which the community and infrastructure cannot sustain.

Yours faithfully,

Alan McNab



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



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#### **PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mr	
Name	Alan McNab	
Job Title (if appropriate)	Company Director	
Organisation (if appropriate)	Ezee Legal Services	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to *All*

Policy Ref

CS1, to CS5,  
*SUE ETC*

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### **3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion, especially as most of my neighbours have only just heard of the proposals to build on Green Belt at South Whiston. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states "Planners must protect our Green Belt" see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case.

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton. Is Not consistent with National Policy

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

[Redacted Signature]

Date

13th November 2014



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

#### **RETURNING THIS FORM**

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

#### **PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mrs	
Name	Bess Smith	
Job Title (if appropriate)	Treasurer	
Organisation (if appropriate)	Cronton Pathways Walks for Health	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Bess Smith Cronton Pathways Walks for Health

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
M065

Policy Ref

CS1, to CS5,  
SUE

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### **3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion, especially as most of my neighbours have only just heard of the proposals to build on Green Belt at South Whiston. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states “Planners must protect our Green Belt” see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case.

More recently Prince Charles has written in Country Life magazine warning that the majority of people have “lost any real connection with the land” as he outlined his concerns about the future of the countryside, (theguardian.com, Wednesday 12 November 2014). This should surely make planners reconsider the impact of losing green belt land in an area prone to urban sprawl

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings. Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touches Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton. Cronton is already hemmed in on the east and south sides due to Halton building on greenbelt. . As a volunteer-led walking group under the banner of Walking for Health we have been developing walks for local people in our local area for 3+ years. If this development goes ahead many routes will be lost to us, as it will not be a pleasant environment in which to walk for health.

Is Not consistent with National Policy.

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

████████████████████

Date 12.11.2014





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council

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Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	GARY DAVIS	
Job Title (if appropriate)		
Organisation (if appropriate)	WHISTON GREEN BELT ACTION GROUP	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

WHISTON GREENBELT ACTION GROUP

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
M065

Policy Ref

CS1, to CS5,  
SUE AD51

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CS1 to 5, AD51 and the SUE documents are out of step with Public opinion,. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill. I consider the council have not utilised empty properties and brown field sites in its calculations of housing needs. The council have not considered infrastructure improvements to cope with the influx of people.

See attached sheets

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Carry out an up to date housing requirement survey taking into account the latest figures from the Office of National Statistics.

Carry out a relevant Traffic Management survey, taking into account the existing loads at peak times and the additional loads placed upon the area with an influx of at least 2200 vehicles.

Insist that empty properties and brown field sites are developed before considering Green Belt release.

Put back any Green Belt release until end of plan period, and even then consider all other areas, green belt release should be the last resort, not the first action

See attached sheets

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date 3-11-2014

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion,. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states "Planners must protect our Green Belt"

see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case. I note that under 'Housing land requirements and legal duties' the words from Government, in relation to maintaining a 5 year housing supply are 'advise' and 'should' (not 'instruct' or 'must'. The Council should ensure that brown field sites are prioritised, before any Green Belt release is considered.

I note that the numbers of dwellings to be built, and which subsequently make up the five year targets are set locally, by Knowsley Council (not the Government).

Knowsley say that the figure of 8100 new dwellings over the plan period (an ambitious figure, that is the real cause of all the problems) has been partly informed by household projections. Household projections for Knowsley between 2008 and 2028 (a time period greater than the plan period, but still with the same end date) gives a projected increase of 7000 dwellings. Knowsley state that this figure may be revised downwards, when new household projections are released by the Office for National Statistics. This is highly likely, given the revising downwards of the population forecasts for Knowsley, earlier this year. The Plan does then use the latest data.

The latest SHLAA (2012) identifies enough land in the urban areas of Knowsley for 5636 dwellings. Knowsley have adopted a cautious approach, with the identified sites, and the actual potential figure is a lot higher. A lot of these sites, whilst potentially able to accommodate housing are classed as 'undeliverable' within the 5 year supply period (due to various potential constraints, or timing issues). That is what the developers were able to persuade the Inspector of, during the public inquiry. However, by allowing building on Green Belt sites, it becomes less likely that the brownfield sites, in the existing urban areas, will be developed. There really does need to be a 'brownfield first' policy adopted by the Government.

In addition to the above, at April 2012 (latest figures available), Knowsley had 2020 homes registered as being empty. Bearing in mind that the 5636 figure from the potential housing supply could potentially be a lot higher,  $5636 + 2020 = 7656$ . Therefore at least 7656 potential dwellings are available, before any Green Belt release should be considered.

Also, Before any windfall sites (sites not considered as housing sites, but which subsequently become available), and there have been a lot of these in the past, are taken into consideration, and before the 'duty to co-operate' (where nearby local authorities such as Liverpool, with large areas of vacant and derelict land can potentially accommodate any unmet demand) is considered, I would reason that exceptional circumstances do not exist to warrant altering the Green Belt boundaries, in order to remove land from it.

Knowsley Council are making assumptions about housing targets, and planning for figures higher than those forecast by the Office for National Statistics. I believe that this 'predict and provide' approach, which is based upon an ambition, as opposed to an actual need, does not constitute exceptional circumstances I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton.

Is Not consistent with National Policy



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

### RETURNING THIS FORM

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Keith Wooding	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B 1- YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Keith Wooding

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
M065

Policy Ref

CS1, to CS5,  
SUE

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

Generally, the Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

It is disappointing that these proposals to build on Greenbelt at South Whiston have only just come to light despite claims that due consultation process has been followed. Public meetings with the Inspector should be re-convened to take into account the views of local residents in accordance with the provision of the Government in the Localism Bill.

It can be seen that the Knowsley Local Plan does not take into account the latest data from the Office of National Statistics (ONS) in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014. Furthermore, the plan, its strategy and objectives contain many conflicting and ambiguous statements, with little in the way of tangible deliverables. Often making reference to flawed and outdated supporting documentation.

Delivery of Strategic Objectives is not considered to be SMART, outputs are not 'measurable' and therefore cannot be seen as being 'achievable'. This in turn would cast doubt on the 'realistic' criteria.

On a personal note if I had submitted proposals for work, of this standard with this many grey areas, undefined & unquantified benefits with little substantive basis, I'd be shot.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 11/11/14



## **PART B2 – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
c) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP (updated October 2014) the Secretary of State for Communities, which states "Planners must protect our Green Belt" and "This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development". See link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. It is clear that no exceptional circumstances exist in Whiston.

The North West does not have the Housing shortage that London and the South east has, and as such removal of Greenbelt should not be considered in this case.

This objection to the release of green belt has also been raised as Knowsley council have not proven that all practical alternatives & Brown Field sites have been explored, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley plan fails to give high enough priority and consideration to the empty housing stock within the borough. Knowsley have a very poor record of bringing empty and derelict housing back into use. No reference can be found to any consultation with local housing trusts. Knowsley have not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touches Liverpool at Huyton and the proposals at South Whiston will bring urbanisation up to the boundary with St Helens. Likewise the proposal at Cronton will bring Knowsley closer to Halton. This is NOT consistent with National Policy.

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

c) No, I do not want to participate at any further public hearing

d) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

**PART B3 – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| e) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

In relation to KGBS14 South of Whiston. This policy is contrary to Strategic Objective 8, CS5, CS8 & CS21. Either the principles set out in SO8 are adhered to, or the land is used for development.

As stated in CS5 and CS8, it cannot meet both opposing policies. In fact C21 8.21-8.26 reduce to the point of being ineffective the relevance of CS3 and the requirement to release Green Belt land for development at all.

Given that there are prime areas of land around Prescot & Huyton that previously have been earmarked for housing yet lie undeveloped for a number of years indicates that Knowsley model for predicting the number of houses that will need to be built and the land required is flawed.

If the model was correct those areas would have been redeveloped. This proves that there is no justification to release Green Belt land except for Knowsley council financial benefit.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

e) No, I do not want to participate at any further public hearing

f) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

## **PART B 4– YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
g) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

With regard to the area south of M62. The proposed September modifications took the emphasis off investment in existing locations and placed it firmly on the 'new'. This indicates that Knowsley have little or no appetite to fill the empty space in Huyton Business park and empty units on nearby Fallows Way.

A ten minute drive round Huyton Business Park will show how much unused land or empty unit/buildings are available. The occupancy level is one area where there are inaccuracies in the supporting documentation.

The area south of M62 doesn't need more employment locations, it just needs the existing areas to realise their full potential. Proper effective management would achieve this whilst allowing other Core Objectives to be met.

Clearly the site has potential, as recently a developer acquired a large site for redevelopment.

For Fallows way, it is believed that two of the three units are un occupied at present. If the remaining occupant could be encouraged to relocate to Huyton Business Park, the whole of Fallows Way could be given over to housing. Reducing further the need to use Green Belt land. This would have the added benefit of reducing the number of large lorries that use Windy Harbour Road daily and hence congestion.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy** and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11 / 11 / 14

## **PART B5 – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

With regard to KGBS14 South Whiston, there is very little mention of provision for new local centre, expansion or regeneration of existing local shops

As for 6.45, the policy is flawed and mostly irrelevant. This highlights lack of understanding of local issues. In turn this suggests that Knowsley have taken a 'one-solution-fits-all' approach. This element of the core strategy cannot be met.

Little mention is made of requirement for additional facilities such as health care or clinic, GP surgeries and dentist. Nursery and school requirements are also not described.

No reference was found to alternative policy documents that would detail these requirements, which suggests that no additional pre-school or school facilities are planned to meet huge increase in demand for services from such a large housing development. Similarly no additional health care provision. A number of strategic objectives will not be met

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

12/11/14



**PART B6 – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| k) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| l) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

With reference to KGBS14 South Whiston area.

Improvements to existing rail network, enhancements to stations.  
As a regular train user from Whiston Station, Network Rail have been observed undertaking a passenger survey. This is with a view to CLOSE Whiston station. How does that help meet the transport policy? Clauses 1a, 1c, 2b, 3b, 3e

Also, and contrary to supporting documents, bus routes and times have been revised to the effect of after evening rush hour a minimal number buses are running. This will prevent a number of clauses from being met.

This removes choice, a key policy objective.

In reality this will manifest itself as people making greater use of personal car or cars. This will further bring the transport policy into disarray and have a negative impact on other perceived benefits & strategic policies

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

#### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

#### **PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Miss	
Name	K Meredith	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
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Policy Ref

KGBS 14

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### **3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion, especially as most of my neighbours have only just heard of the proposals to build on Green Belt at South Whiston. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states “Planners must protect our Green Belt” see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case.

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. There is a Duty to Co-Operate which has not been considered.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton. This is not consistent with National Policy.  
**Continued on separate attachment.**

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

Date 13/11/14

## Attachment – Objections to KGBS 14

<p>E1 To protect, enhance and manage the local character and accessibility of the landscape and countryside across Knowsley</p>	<p>Although some of the locations that would be released from the Green Belt contain areas that have been previously developed and other policies in the plan will seek to protect landscape character, each of the options could support the release of areas of greenfield land and have a negative impact on landscape character. As such, each of the options has the potential to have a negative impact on the objective. However, Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being ‘called in’ by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term. It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward</p>
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### Objections:

- The purposes of Green Belts in planning policy are clear – to protect the countryside from urban sprawl and to retain the character of towns and cities (Natural England, 2010). The proposal to release the Green Belt in South Whiston will exacerbate urban sprawl and its identity and character as a village community will be lost.
- As this is the last area of Green Belt within the South Whiston area the residents will no longer have access to the natural environment and all the benefits that the natural landscape exhibits.
- Those areas which are not to be included in the release from Green Belt – Old Wood and Big Water – would be severely impacted by the influx of residents to the proposed development. These features would be isolated amidst the proposed development and would be rendered unsustainable as a quality natural landscape and habitat for wildlife.
- Release of the Green Belt in South Whiston will contradict the purpose of Green Belt ‘to retain attractive landscapes, and enhance landscapes, near to where people live’.
- The local character and natural landscape of South Whiston stem from the early 12<sup>th</sup> century (Merseyside Historic characterization Project, 2011). The loss of this natural landscape held within the very last of the Green Belt in South Whiston would see the complete eradication of all the historic character that currently remains. The heritage of South Whiston would thus be lost for all current and future residents.
- Whiston is a ‘village’ with a village community. The proposed development would eradicate this village community as numbers would be too great for the community to be considered a village any longer.

E2	Each of the options could support the release of
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<p>To protect, enhance and manage biodiversity, the viability of protected and endangered species, habitats, geodiversity and sites of geological importance.</p>	<p>land from the Green Belt to meet the Borough's housing and employment needs. A number of these Sustainable Urban Extensions contain Local Wildlife Sites and others are located in close proximity to them. In addition, as significant number of the Sustainable Urban Extensions also contain areas of priority habitat. As such, each of the options has the potential to have a negative impact on the objective, although it is acknowledged that other policies in the plan seek to protect biodiversity and features of ecological importance. Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being 'called in' by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term as it may not provide the certainty for the development industry required to guarantee the necessary investment to bring such sites forward for development.</p> <p>It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward.</p>
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Objections:

- The protection, enhancement and management of the remaining area of ecologically isolated green belt will be rendered a belated and insufficient attempt to restore/protect/fix what has already been lost.
- Ecological dispersal and colonization of protected and endangered species will be prevented via fragmentation of vital habitat networks; inadequate dispersal of species will cause a local and regional extinction of nationally significant and endangered species. (Harrison and Bruna, 1999)
- Agricultural land adjoining Big Water and Old Wood is currently providing essential refuge for nationally endangered, red listed grey partridge, a victim species that relies on farming systems for its food source and habitat. (RSPB, 2014). There is a significant population throughout the agricultural land surrounding Big Water and Old Wood. Nationally 87% of the population of grey partridge has been lost since the 1970's, a direct result of habitat fragmentation and loss. It can be expected to deteriorate further owing to the potential loss of the agricultural green belt of South Whiston.
- The agricultural land adjoining Big Water and Old Wood provides refuge and food source for sky lark which has reduced nationally in population by 62%, overall farmland bird species which have reduced by 56%, and lapwings which have fallen in population by 76% since the 1970's (RSPB, 2014). This land is also the hunting, nesting and breeding grounds of buzzards and barn owls the numbers of which will be directly and severely impacted by the loss of the agricultural green belt in South Whiston. So too the population of their prey of field mice, voles and rabbits.
- Impact of human activity upon the remaining area of Greenbelt, i.e. Big Water and Old Wood after development has taken place would have a detrimental effect upon the quality of natural habitats and upon all local species. Increase in human population in addition to the close

proximity to the remaining Greenbelt will further degrade the natural environment as a result of vandalism and overall human impact.

- Without sufficient connectivity of green corridors the isolated patches of Greenbelt will suffer a loss of biodiversity and environmental quality. Current natural linkages connecting Stadt Moers to the South Whiston Greenbelt would be disconnected by the proposed development, preventing colonization and migration of species.
- Migrating water fowl e.g. Swans, Canadian Geese, Coots, Moorhens, Herons which frequent big water will diminish due to the encroachment of urban sprawl. This will have a detrimental effect upon the quality of Big Water fresh water habitat as they naturally manage the fresh water habitats.
- Had a full ecological and habitat survey been undertaken by KMBC it would have established, in summary, that the urban fringe woodland of Old Wood and Big Water, and supportive agricultural land, all within the green belt of South Whiston, was essential to the conservation of the abundance of wildlife and thus their sustainable future.



<p>E3. To adapt to climate change including flood risk.</p>	<p><b>The Strategic Flood Risk Assessment</b> identifies that a small part of the southern section of the site is at risk of fluvial flooding. This risk of flooding will be exacerbated by climate change and this part of the site should only be considered for development as part of a sequential approach. It is recognised that the identified capacity of the site has been derived from the assumption that the portion of the site within Flood Zones 2 and 3 will be excluded from the developable area and unless this is the case, and the other identified mitigation measures are implemented, the proposals could have a negative impact on the objective and its sub-objective of reducing flood risk.</p> <p><b>The Preliminary Flood Risk Assessment</b> indicates that the site also falls within an area that is susceptible to ground water flooding. Nevertheless, the PFRA does recognise that there is a lack of local information in relation to groundwater flooding and that the dataset used only identifies wider areas that may be at risk from groundwater flooding. Accordingly, the information on groundwater flooding is caveated by the acknowledgement that only isolated locations within the overall susceptible area are likely to suffer the consequences of groundwater flooding. Nonetheless, the proposals would result in a significant area of greenfield land being replaced with built development which may have an adverse impact on levels of surface water run-off if suitable measures are not implemented, such as sustainable drainage systems.</p> <p>The proposals would also result in the loss of a greenfield site that has the potential to provide habitat for species and help mitigate higher summer Temps associated with climate change.</p>
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Objections:

- Extensive inland flooding in 2007 focused attention on the economic and human costs of flooding (Pitt, 2008). Climate change is already causing heavier downpours, especially in winter, a trend that is projected to persist and increase flood risk (Defra, 2009). At present the 110 hectares of Green Belt in Whiston acts a soak for surrounding areas, The increased rainfall in Storm conditions(see below) will seriously challenge the ability of the existing main drains (AD51, map MMD-321747-D-SK-00-XX-0001) to handle such downpours. There is a distinct possibility that the M62 could flood if such a large area of Green Belt is put under concrete. Added to this the proposed development at Cronton (which in certain areas is lower than Whiston) would not be able to take any surplus rainfall.
- Properties in Foxshaw Close and Windy Arbour Close and the Green Belt to the rear of these properties are on a very high water table. These properties had to install extra drainage following the development of the Lickers Lane estate in the 1970's as water levels rose and caused flooding to property foundations. Clear spring water was found beneath floor boards which had to be drained in order to prevent subsidence of the properties and to prevent rising damp.

- Further development of the Green Belt to the rear of the properties will further impact the high water table and increase the probability of flooding to these properties and surrounding properties.
- No indication has been given as to the capacity of United Utilities to provide water treatment and sewage treatment, at the local water treatment works, for the proposed development.

<p>E4. To mitigate climate change including using energy prudently and efficiently and increasing energy generated from Renewable sources.</p>	<p>Each of the options would inevitably result in some carbon emissions and could therefore have a negative impact on the objective and its sub-objective. Other policies in the Core Strategy are likely to ensure that all new development is designed in a way to maximise energy efficiency and it is recognised that the proposers of the site have stated that the site may offer opportunities for decentralised energy systems due to the quantum of development proposed. It is however recognised that there is presently no certainty that such systems would be incorporated into the proposals for the site and it is noted that the Knowsley Renewable and Low Carbon Energy Options study (2009) considered that a purely residential development of the area would be unlikely to readily lend itself to a district heating opportunity. In addition, the site is not located within a ‘Priority Zone’ for renewable and low carbon energy as identified by the Liverpool City Region Renewable Energy Capacity Study (2009) and it is therefore unlikely to deliver a reduction in carbon emissions beyond those required by Local Plan policies. The proposals are likely to result in an increase in traffic in the immediate surrounding area. It is however noted that there are a range of local facilities and amenities that are readily accessible from sections of the site including primary schools, a GP and health centre and a local shopping centre on Greene’s road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opposite side of Windy Arbor Road and Huyton Business Park which may reduce the need to travel for work. Furthermore, both Options 1 and 2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, and taking into account the scale of development that would be likely to come forward on the site, it is considered that each of the options have the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of onsite facilities.</p>
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Objections:

- It is quite clear that the development of Green Belt in Whiston will have an overall negative effect on the aim to mitigate climate Change. The Sustainable and Low Carbon Development (5.183 SD32. CS22) removal of the developers need to meet the Sustainable homes/BREEAM standards will increase energy usage.
- The increase in Traffic in the area will increase carbon emissions and have a detrimental effect on Air Quality.
- The Industrial Estate mentioned on Windy Arbor Road has little effect on employment as the few factories that are occupied, have no need for more workers.
- There is also an acceptance that this development will not be suitable for energy generated by renewable sources. In addition, the removal of the requirement to achieve a certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.
- “The need to build more sustainable housing with a limited supply of land means that innovation is necessary but working towards sustainable communities relies on more than the achievement of zero carbon housing; its success will also be determined by the selection of appropriate locations for development”, Neil Williamson FLI, President Landscape Institute

<p>E5. To provide, conserve, maintain and enhance green infrastructure.</p>	<p>Although Options 1 and 2 would support the retention/provision of some areas of public open space, each of the options would result in the loss of substantial area of greenfield land which offers the potential to function as part of the Borough’s Green Infrastructure network and it is considered that each of the options would have a negative impact on this objective due to the area of greenfield land that would be lost. It is however acknowledged that there is only a low level of certainty over this impact of Options 1 and 2 on the objective due to their potential to retain areas of public open space &amp; increase the quality of the accessible green infrastructure network. By contrast, there is a higher degree of certainty that Option 3 would have a negative impact on this objective as it would not offer the same level of protection to areas of Public Open Space.</p>
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Objections:

- The provision of parks and open spaces in deprived areas such as Knowsley is worse than in affluent areas. The removal of this area of Green Belt would severely impact the deprived residents of this area of Knowsley.
- The higher the quality of the green space, the more likely it is to be used. To build over 1500 houses on Best & Most Versatile Grade2 Agricultural land cannot enhance green infrastructure. Every one of the options would result in the loss of large area of essential open green space. This area of Green Belt is THE VERY LAST piece of Green Belt in South Whiston and as such is the highest quality of open green space in the South Whiston area.
- Open green space is essential to health and well-being especially for mental health and preventing and combating mental health issues. Knowsley MBC would be failing in it’s care of, and provision for, it’s residents suffering mental health issues should this area of Green Belt be developed.

<p>E6. To protect, manage and restore land and soil quality.</p>	<p>Although Options 1 and 2 would support the retention/provision of some areas of public open space, each of the options would result in the loss of a substantial greenfield site. It is also noted that the majority of the site is classified as Grade 2 Best and Most Versatile agricultural land and that parts of the site are presently within agricultural use. It is therefore considered that each of the options have the potential to have a significant negative impact on this objective and also on the sub-objective of directing new housing to previously developed land. There is a higher degree of certainty that Option 3 would have a negative impact on this objective as it could also result in development on the greenfield parts of the site that are existing areas of Public Open Space.</p>
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Objections:

- The majority of the site is classified as Grade 2 Best and Most Versatile agricultural land and has been farmed for many years. None of the options will meet the objective to restore land and soil quality. UK soils store over 10 billion tonnes of carbon in the form of organic matter. The size of this store means soil has a vital role to play in helping to combat climate change. “Preventing emissions from soil and exploring how to increase existing stores of soil carbon can make an important contribution to meeting the Government’s emission reduction targets and carbon budgets, introduced by the Climate Change Act 2008”. Defra, Soils Policy Team

<p>E7. To protect, improve and where necessary, restore the quality of inland, and estuarine waters.</p>	<p>The site is in close proximity to a number of bodies of water, including Big Water. Directing development to locations close to these features has the potential to adversely affect water quality unless adequate mitigation measures are adopted. It is however recognised that there is limited certainty about the impact of development in this location on the water quality. In addition, it is noted that each of the options could result in the remediation of any contamination on the site and thereby eliminate a potential source of pollutants for this watercourse. As such, the impact of each of the options on the objective is uncertain.</p>
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Objections:

- It is critical that this precious resource is managed properly to ensure that the needs of society, the economy and wildlife can be met and maintained in the long-term. Surrounding Big Water Lake with a vast housing estate of over 1500 houses must surely impact on the quality of water in the local area. The lake in this area is used for recreation and fished regularly by a local club, it is considered “Good Fishing” one of its advantages is its rural location. We have seen no mitigation of negative effects on water, suggested by Knowsley Council.

<p>E8. To protect, and where necessary, improve local air quality.</p>	<p>The proposals are likely to result in an increase in traffic in the immediate surrounding area but it is recognised that the extent to which this will impact on air quality is uncertain and the site is not within an Air Quality Management Area. It is noted that there are a range of local facilities and amenities that are readily accessible from sections of the site including primary schools, a GP and health centre &amp; a local shopping centre on Greene’s Road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opp side of Windy Arbor &amp; Huyton Bus Park which may reduce the need to travel for work. Nevertheless, these community facilities are some distance from the eastern and southern sections of the site and only the northern sections of the site are within 800m of Whiston railway st &amp; not all of the site is in close proximity to the existing bus routes on Windy Arbor &amp; Lickers Lane. The proposer of the site has also stated that the proposals would include on-site facilities, the provision of new bus routes through the site and that the development would be designed to encourage walking and cycling. Both Options 1 &amp;2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, due to the number of trips that a development of this scale would be likely to generate, it is considered that each of the options has the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of on site facilities.</p>
--	---

Objections:

- It is highly unlikely that a development of over 1500 houses would improve air quality especially if you take into account the level of traffic increase. The suggestion that walking to Greenes Road is an option for a non car owning elderly or young person in winter is a non-starter. Bus services are poor in Whiston at best and non-existent after 8pm at the southern end of Windy Arbor Road.
- “Our farmland and countryside can produce high-quality food and support wildlife when trees play a part in the landscape. We all breathe easier when there are beautiful woods in which to

relax and unwind. And yet the UK needs more trees. We are one of the least wooded countries in Europe and trees and woods continue to disappear from our landscapes”. *Woodland Trust*

- There is a need to reduce the need to travel by car and increase the use of more sustainable forms of transport. Economic activity rates and incomes are lower in Knowsley than the NorthWest average.
- There is a need to retain a greater proportion of retail expenditure within Knowsley to enhance the vitality and viability of the Borough’s town centres.
- 2 of the 15 conservation areas in Knowsley are included on the latest Heritage at Risk register;
- Access to areas of natural and semi-natural open space is poor in parts of the Borough;
- There is a need to conserve and enhance the natural environment recognising the importance of biodiversity.
- There is a need to secure and promote increased energy efficiency and renewable energy sources;
- There is a need to promote and secure more sustainable waste management.
- There is a need to consider the impacts of flooding and flood risk;
- The re-use of land should be promoted to minimise the take-up of greenfield land.

Source: Sustainability issues were derived from the baseline data gathered in 2008 – 2009 to inform the SA SD07 Scoping Report, Knowsley council

None of the Knowsley MB goals, above, will be achieved by releasing Green Belt.

“Air pollution is currently estimated to reduce the life expectancy of every person in the UK by an average of 7-8 months. The measures outlined in the strategy could help to reduce the impact on average life expectancy to five months by 2020, and provide a significant step forward in protecting our environment.” DEFRA The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

<p>E9. To use water and mineral resources prudently and efficiently.</p>	<p>Each of the options is unlikely to have any significant effects on the objective.</p>
--	--

Objections:

The objections would be largely in line with those made against E7 as follows:

- It is critical that this precious resource is managed properly to ensure that the needs of society, the economy and wildlife can be met and maintained in the long-term.
- Surrounding Big Water Lake with a vast housing estate of over 1500 houses must surely impact on the quality of water in the local area.
- The lake in this area is used for recreation and fished regularly by a local club, it is considered “Good Fishing” one of its advantages is its rural location. We have seen no mitigation of negative effects on water, suggested by Knowsley Council.



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	NATASHA MURKHEAD	
Job Title (if appropriate)	HMRC	
Organisation (if appropriate)	" "	
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	[REDACTED]	

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

~~XXXXXXXXXX~~ NATASHA MURHEAD

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

SUE 2A

Policy Ref

K6B514

Paragraph Ref

E3

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Local green space is essential to the education and ~~local~~ welfare of current and future generations.

Residents and visitors cherish our greenbelt space. The proposals are not sound as they completely ignore the social welfare and interests of Whiston residents.

Once this greenspace has gone, it will never return.

Continue on a separate sheet if necessary...



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

A sound modification would be the preservation of derelict and unused buildings/houses such as those in Toxteth, Liverpool 8 Area and Morris Green. This would be helpful for the taxpayer and help the regeneration of the local economy in those areas.

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



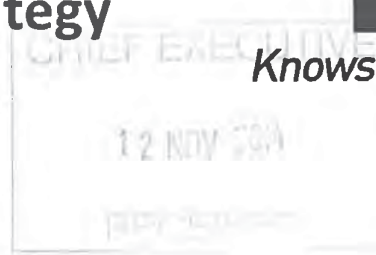
Date 9/11/2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Ray Davis	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt Action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Whiston Green Belt Action Group

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
M065,

Policy Ref

SD32,  
SUE1,SUE2C

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CS1 to 5, AD51 and the SUE1, 2c documents are out of step with Public opinion,. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill. I consider the council have not utilised empty properties and brown field sites in its calculations of housing needs. The council have not considered infrastructure improvements to cope with the influx of people.

See attached sheets

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

Carry out an up to date housing requirement survey taking into account the latest figures from the Office of National Statistics.

Carry out a relevant Traffic Management survey, taking into account the existing loads at peak times and the additional loads placed upon the area with an influx of at least 2200 vehicles.

Insist that empty properties and brown field sites are developed before considering Green Belt release.

Put back any Green Belt release until end of plan period, and even then consider all other areas, green belt release should be the last resort, not the first action

Re-convene the public hearing due to the poor performance of the Council in letting the public know.

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 30/10/2014

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CSI to 5 and the SUE documents are out of step with Public opinion,. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states "Planners must protect our Green Belt"  
see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case. I note that under 'Housing land requirements and legal duties' the words from Government, in relation to maintaining a 5 year housing supply are 'advise' and 'should' (not 'instruct' or 'must'. The Council should ensure that brown field sites are prioritised, before any Green Belt release is considered.

I note that the numbers of dwellings to be built, and which subsequently make up the five year targets are set locally, by Knowsley Council (not the Government).

Knowsley say that the figure of 8100 new dwellings over the plan period (an ambitious figure, that is the real cause of all the problems) has been partly informed by household projections. Household projections for Knowsley between 2008 and 2028 (a time period greater than the plan period, but still with the same end date) gives a projected increase of 7000 dwellings. Knowsley state that this figure may be revised downwards, when new household projections are released by the Office for National Statistics. This is highly likely, given the revising downwards of the population forecasts for Knowsley, earlier this year. The Plan does then use the latest data.

The latest SHLAA (2012) identifies enough land in the urban areas of Knowsley for 5636 dwellings. Knowsley have adopted a cautious approach, with the identified sites, and the actual potential figure is a lot higher. A lot of these sites, whilst potentially able to accommodate housing are classed as 'undeliverable' within the 5 year supply period (due to various potential constraints, or timing issues). That is what the developers were able to persuade the Inspector of, during the public inquiry. However, by allowing building on Green Belt sites, it becomes less likely that the brownfield sites, in the existing urban areas, will be developed. There really does need to be a 'brownfield first' policy adopted by the Government.

In addition to the above, at April 2012 (latest figures available), Knowsley had 2020 homes registered as being empty. Bearing in mind that the 5636 figure from the potential housing supply could potentially be a lot higher,  $5636 + 2020 = 7656$ . Therefore at least 7656 potential dwellings are available, before any Green Belt release should be considered.

Also, Before any windfall sites (sites not considered as housing sites, but which subsequently become available), and there have been a lot of these in the past, are taken into consideration, and before the 'duty to co-operate' (where nearby local authorities such as Liverpool, with large areas of vacant and derelict land can potentially accommodate any unmet demand) is considered, I would reason that exceptional circumstances do not exist to warrant altering the Green Belt boundaries, in order to remove land from it.

Knowsley Council are making assumptions about housing targets, and planning for figures higher than those forecast by the Office for National Statistics. I believe that this 'predict and provide' approach, which is based upon an ambition, as opposed to an actual need, does not constitute exceptional circumstances. I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton.

Is Not consistent with National Policy

## 04 POLICY CS1

### Representations relating to Policy CS1: Spatial Strategy for Knowsley

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS1 001	1	108	Chris Edge, Barton Willmore for Junction Property Ltd
POLICY CS1 002	1	295	Jane Aspinall, Bellway Homes
POLICY CS1 003	1	119	Sian Butt, Pegasus for Taylor Wimpey
<b>Total</b>	<b>3</b>		

**From:** Chris Edge [REDACTED]  
**Sent:** 14 November 2014 08:34  
**To:** Knowsley Local Plan  
**Subject:** Knowsley Local Plan Core Strategy and SPD: Representations on Behalf of Junction Property Limited  
**Attachments:** CS Mods Response Form.pdf; SUE Consultation- 20 10 14.pdf; Counsel's Opinion-Policy SUE2-Nov 2014.pdf; Repls -Proposed Mods-Final- 07 11 14.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs,

Please find attached representations on behalf Junction Property Limited (JPL) to the following consultation documents:

1. Representations to the Knowsley Local Plan: Core Strategy: Proposed Modifications - Consultation (representations form, representations report and Counsels Opinion - 3 pdf files); and
2. A Representations Form in respect of the South of Whiston (residential) and Land South of M62 (employment and Country Park) SPD (1 pdf file).

Please acknowledge receipt of this email and the attachments in due course.

Kind Regards,

**Chris Edge**  
Associate

Planning . Design . Delivery  
**bartonwillmore.co.uk**



Please consider the environment before printing this email



We are exhibiting at the Farm Business Innovation Show 2014!  
Find more information on our stand and seminar [here](#)

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# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



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#### **PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title		
Name		Michael Courcier
Job Title (if appropriate)		
Organisation (if appropriate)	Junction Property Ltd	Barton Willmore
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
a) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input type="checkbox"/>
b) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input type="checkbox"/>

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

*Continue on a separate sheet if necessary...*

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

**Signature**

**Date**

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RE: THE KNOWSLEY LOCAL PLAN: CORE STRATEGY AND POLICY SUE2

ADVICE

1. I am asked to advise on an issue which has arisen in respect of the latest proposed form of policy SUE2 of the Knowsley Local Plan Core Strategy.
2. My Instructing Planner is acting on behalf of clients who are promoting the development of land South of Whiston and South of the M62 in Knowsley. Both areas of land are proposed to be taken out of the Green Belt and allocated in the Core Strategy as Sustainable Urban Extensions (“SUE”).
3. The policy contains some detail about how applications for planning permission in those (and other) SUEs will be treated. This largely consists of referring to issues that would be material considerations in any planning decision and giving cross-references to other plan policies. Masterplans are to be prepared, as are Supplementary Planning Documents.
4. Part 2 of policy SUE2 would provide that “Indicative considerations applicable to the sustainable development of each SUE are listed at Appendix E ‘Sustainable Urban Extension Allocation Profiles’”. However, Appendix E gives very little information. For each of the SUEs in which my client is interested, the appendix gives details of site location, size and capacity and then refers to flood zones, wildlife sites, urban green space and the need to connect to extant urban development. Importantly, appendix E is introduced with a statement that whilst

the appendix sets out key planning constraints and opportunities, the items listed are not exhaustive and other considerations are likely to apply.

5. Part 3 of policy SUE2 states that for each SUE, the Council will prepare a Supplementary Planning Document (“SPD”) which will set out a proposed spatial framework, together with “further details of development and infrastructure requirements”.
6. I am asked whether there is a risk that the proposed SPDs would be unlawful. I think that there is. I say that for the following reasons.
7. The Town and Country Planning (Local Planning) Regulations 2012 set out, rather tortuously, what documents can and cannot be SPDs. They do so in a most convoluted way.
8. Regulation 2 of the 2012 Regulations sets out a definition of “Local Plan” as being any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv) or 5(2)(a) or (b), and requires such documents to be prepared as a development plan document. For some unknown reason, that definition is repeated in identical terms in Regulation 6.
9. The 2012 Regulations define an SPD as any document of a description referred to in regulation 5 (except an adopted policies map or a statement of community involvement) which is not a local plan. For all practical purposes, that means that only a document which falls within the scope of Regulation 5(1)(a)(iii) can be an

SPD. No other document can be an SPD because it will either (i) not be within the scope of Regulation 5 at all, or (ii) be within the scope of Regulation 5 but is a local plan: see *R (RWE NPower Renewables Limited) v Milton Keynes BC and another* [2013] EWHC 751 (Admin) at [28].

10. A document does not come within the scope of Regulation 5 at all if it merely repeats Development Plan policy for background information or for clarity of presentation and Regulation 5 is concerned with *new* statements of policy: *RWE NPower* at [67].
11. The difficulty is caused in this case by the vagueness of what the Development Plan leaves as the potential content of the SPD. The warning that the information in the plan and its Appendix E is not comprehensive runs the real risk that new statements could be set out in the SPD for the first time and it cannot be said that the SPD would simply repeat the Development Plan policy for clarity or background. So much is, I think, clear from the introductory words of caution in Appendix E and the generality of the content of policy SUE2 itself.
12. If that is so, one has to consider whether the SPD might contain provisions which fall within the definition of a local plan. It is clear that the SPD would not contain new site allocations because that is an issue about which policy SUE2 is sufficiently clear. There is therefore no need to consider Regulation 5(1)(a)(ii), aspects of (iv) or 5(2)(b) any further.

13. Regulation 5(1)(a)(i) applies to documents which contain statements about “the development and use of land which the local planning authority wish to encourage during any specified period”. The Courts have emphasised the references to encouragement and to a specified period: *Miller Homes Limited v Leeds City Council* [2014] EWHC 82 (Admin) at [24]<sup>1</sup>. There must be a real risk, given the current terms of the Core Strategy, that the SPD would contain new statements which fall within this classification.

14. Further, Regulation 5(1)(a)(iv) has the effect of providing that a document will be a local plan and has to be prepared as a DPD if it contains statements about “development management .... policies, which are intended to guide the determination of applications for planning permission.” The Courts have held that the important consideration is whether the policy is designed to regulate the use of land: see *RWE NPower* at [75] and *Miller Homes* at [37]. Given the indications in the Core Strategy of what the SPD might deal with, there must be a real risk that the purported SPD would contain new statements of policy which regulate the development of the SUEs.

15. In short, the only document which could lawfully be an SPD connected to policy SUE2 would be one which fell within the scope of Regulation 5(1)(a)(iii) of the 2012 Regulations, namely a document containing statements about “any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i)”. I do not believe that it can be said that SPD would be bound to fall within this

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<sup>1</sup> It should be acknowledged that this case is the subject of an appeal to the Court of Appeal which has a date for a hearing fixed in March 2015.

category, given that policy SUE2 part 3 states that the SPD will contain a spatial development framework and further details of development and infrastructure requirements. It seems to me that the draft Core Strategy envisages the SPD going beyond what is within the lawful scope of an SPD.

16. I therefore conclude that on the basis of the presently proposed terms of policy SUE2, there is a very real risk that any purported SPD would go beyond the lawful scope of an SPD and would enter territory which can only be covered by a Development Plan Document.

17. Indeed, the matter goes further than that. The lack of clarity in the proposed policy itself means that the policy itself may be unlawful. That is because part 3 of policy SUE2 vaguely refers to the provision of “further details of development requirements” being set out in the SPD. That approach, depending upon what those words intend and the proposed content of the SPD, runs the risk of falling foul of the principle that a Development Plan Document cannot choose to exclude from it policy provisions which the plan maker intends to guide decision-making: see *Westminster City Council v Great Portland Estates* (1985) AC 636 at page 674E where Lord Scarman said:

*“If a local planning authority has proposals of policy for the development and use of land in its area which it chooses to exclude from the plan, it is, in my judgment, failing in its statutory duty.”*



18. I accept that SPDs can be used to prescribe further detail to a policy set out in the DPD<sup>2</sup>, but the vagueness of part 3 of SUE2 means that it cannot be said that SUE2 prescribes the policy requirements at a general level and the SPD would only set out further detail. I think the wording of SUE2 opens the risk that an SPD might contain new statements of policy, not foreshadowed in the Core Strategy and which would not be tested by any examination of their soundness.

19. I trust that I have dealt with all of the matters upon which my view was sought. If I can be of any further assistance, then my Instructing Planner must not hesitate to contact me in Chambers.

MARTIN CARTER  
20<sup>th</sup> October 2014.

Kings Chambers  
Manchester – Leeds – Birmingham.

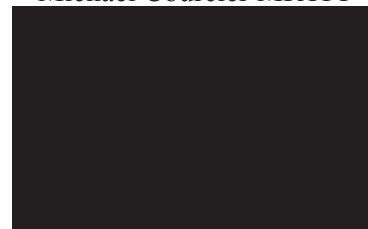
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<sup>2</sup> E.g, *Simplex (GE) Holdings Limited v SoSE* [1988] JPL 809; and *Watson v Essex CC* [2002] EWHC 669 (Admin).

RE: THE KNOWSLEY CORE  
STRATEGY AND POLICY SUE2

ADVICE

Michael Courcier MRTPI



**KNOWSLEY LOCAL PLAN CORE STRATEGY EXAMINATION**  
**PROPOSED MODIFICATIONS TO SUBMISSION DOCUMENTS**  
**REPRESENTATIONS BY BARTON WILLMORE**  
**ON BEHALF OF JUNCTION PROPERTY LTD**  
**NOVEMBER 2014**

**1 Supporting Representations**

1.1 Junction Property Ltd (JPL) supports most of the proposed modifications now being suggested by the Council.

1.2 JPL welcomes in particular the following proposed modifications for the reasons given in evidence to the hearing sessions:

MO42            The removal of the Sustainable Urban Extensions from the Green Belt and their allocation for development as part of the spatial strategy identified in Policy CS1 and its accompanying text.

MO55            Acceptance of the Sedgefield method to calculate the five year housing requirement as part of Policy CS3 and its accompanying text (also MO56A, MO56B, MO65).

MO59            Setting out the circumstances which would trigger a review of Policy CS3. (However JPL considers that this should be a Main Modification because of its importance to the soundness of the Plan rather than a minor modification as currently suggested).

MO76	Inclusion of the reference to very special circumstances as part of Policy CS5.
MO78	Removal of the Sustainable Urban Extensions from the Green Belt as part of Policy CS5.
M112	Confirmation that measures to mitigate carbon emissions and improve air quality will only be sought " <i>where appropriate</i> ".
M157	Confirmation that the release of the Sustainable Urban Extensions will no longer be delayed until the longer-term.

## **2 Representations Objecting to Specific Proposed Modifications**

### **2.1 M168: New Chapter 6A on Sustainable Urban Extensions**

2.1.1 JPL welcomes most of the principles set out in Policies SUE1 to SUE2c. In particular it supports the following:

- the immediate release of the sustainable urban extensions to meet identified development needs;
- the development of the South of Whiston site for between 1500 and 1800 dwellings (depending on whether of the Council owned land currently identified for a cemetery extension is included in the development area);
- the development of the land South of the M62 for employment development; and
- proposals must demonstrate a comprehensive approach to site development and infrastructure provision, including the matters set out in paragraph 6A.18.

- 2.1.2 JPL however **OBJECTS** to the third part of Policy SUE2 where it says that the masterplan required under the policy to accompany any planning applications for the site should "*accord*" with development plan policy "*and any associated Supplementary Planning Document.*" There is of course no objection to the principle that the masterplan should accord with development plan policy. However the development plan should not impose a requirement that the masterplan for a site must "*accord with*" the proposed Supplementary Planning Document. Such a requirement would effectively incorporate the supplementary planning document into the development plan policy as lack of accord with it would create conflict with Policy SUE2 itself. This is wholly inappropriate because supplementary planning documents are not subject to the same rigorous statutory procedures and testing as development plan policies.
- 2.1.3 Development plan policies only receive the status accorded to them under Section 38(6) of the 2004 Act after they have been independently tested and examined, and found to meet the tests of soundness set out in national policy. They are also subject to very exacting and lengthy procedures for stakeholder and public involvement and consultation. In contrast, supplementary planning documents are not the subject of any independent examination or testing against the tests of soundness. Moreover they are not required to undergo the same rigorous requirements for stakeholder and public involvement and consultation. Because of these differences, planning law gives development plan policy and supplementary planning documents very different statuses in decision-making
- 2.1.4 Section 38(6) of the 2004 Act requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Under this section of the Act, a supplementary planning document has only the status of a material consideration to which regard should be given. It is not development plan policy where there is an expectation

of accordance unless material considerations indicate otherwise. As such, a proposal which accords with the development plan but is not in accordance with a supplementary planning document would still receive the presumption in favour under Section 38(6). The proposed modification seeks to reverse this position established by statute. The same would apply to the national policy position, and in particular the presumption in favour of sustainable development under paragraphs 14, 196 and 197 of the NPPF.

2.1.5 The proposed supplementary planning documents for the sustainable urban extensions have not, of course, been prepared yet. As such, it is not known what matters they will cover or whether their policies and proposals will be consistent with national policy and guidance, especially in respect of viability which is so important to the delivery of the Core Strategy as a whole. In such circumstances, it is wholly inappropriate for Policy SUE2 to require planning decisions to accord with them. We note in this respect that the Council has suggested other proposed modifications that remove any requirement for proposals to accord with supplementary planning documents. A similar change should be made here.

2.1.6 To assist the Inspector, we attach Counsel's Written Opinion which confirms that the provisions of Policy SUE2 so far as they relate to the proposed Supplementary Planning Documents would be potentially unlawful and may be capable of successful challenge in the Courts.

2.1.7 For these reasons we consider that the proposed modification in this respect fails the tests of soundness and would be potentially unlawful.

## **2.2 M169 and M190: Policy CS 15 on Affordable Housing**

2.2.1 The proposed modifications make a distinction between the levels of affordable housing required on sites within the current urban area (10%) and on Sustainable Urban Extensions (25%). Proposed Modification 190 says that this distinction is

because the Knowsley Economic Viability Assessment (EVA) "*suggests*" there is a generally higher level of development viability in the proposed Sustainable Urban Extensions than in the existing urban areas.

2.2.2 JPL considers that the proposed policy requirement for sustainable urban extensions has not been properly justified by viability evidence. As such, it does not accord with national policy.

2.2.3 The National Planning Policy Framework (NPPF) states (paragraph 173) that pursuing sustainable development requires "*careful attention*" to viability and costs in plan-making. It emphasises that plans must be deliverable and to achieve this, "*the (allocated) sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.*" The Framework adds that to ensure viability, the costs of any requirements likely to be applied to development "*such as requirements for affordable housing, standards, infrastructure contributions or other requirements*" should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing developer to enable the development to be deliverable.

2.2.4 The Knowsley EVA fails to undertake the type of exercise required by national policy to justify an affordable housing target. The tables at pages 186 to 188 only examine the impacts of individual policy requirements, and no conclusions are reached about the cumulative impact of the policy requirements. Nonetheless, if the impacts of individual policies in Tables 7.30 to 7.32 are added together, it is clear that a 25% affordable housing requirement would not be viable on most large housing sites currently in the Green Belt (equivalent to the sustainable urban extensions) at the likely density of 30 dwellings per hectare. In this regard the Core Strategy does not propose developing the sustainable urban extensions at the

unrealistically high density of 40 dwellings per hectare which is the alternative figure given in the tables.

2.2.5 The EVA does contain a "*case study*" at pages 190 to 191 which purports to undertake a cumulative impact assessment of a large housing site in the Green Belt. However this case study is totally unreliable as a guide to policy-making because:

1. The case study takes no account of the introduction of zero carbon homes in 2016 which will significantly increase construction costs. This is clear from Table 7.33 because it is based on baseline viability which the EVA says excludes zero carbon homes. Instead zero carbon homes is treated by the EVA as an additional policy requirement. This is confirmed by Tables 7.30 to 7.32 (pages 186 to 188) which show additional costs under the Code Level heading. For clarification, zero carbon homes roughly equates to Code Levels 5/6, even after the most recent announcements by the Government. If Zero Carbon Homes is factored into Table 7.33, the proposed development would be unviable. In this regard, none of the larger sustainable urban extensions are likely to begin significant housing construction before 2016.
2. The case study does not make an adequate allowance for likely infrastructure costs. The baseline viability includes an allowance of £7500 per dwelling (Table 7.1, page 127). In addition, Table 7.33 includes a further £590.02 per dwelling for additional infrastructure required by the case study proposal (health centre/primary school/SUDS). Together, it makes a total infrastructure cost for the case study of £8090 per dwelling. This figure must be compared with the infrastructure costs set out in the Mott MacDonald report for the South of the Whiston proposal. Table 6.1 of the Mott MacDonald Report shows infrastructure



costs of £15,300,394 for an 1800 dwelling scheme (which includes the Council's proposed cemetery extension land). This is an average of £8500 per dwelling which is well over the EVA figure for infrastructure in the case study. Moreover there will be other very significant infrastructure costs for the South of Whiston proposal which have not been costed by Mott MacDonald, including contributions for public transport improvements, off-site highway works (such as to the Tarbock Island junction), and for new and improved education and community facilities. Appendix F (penultimate page) of the Mott MacDonald Study confirms that these costs have not been included in their estimates. Although no exact figures can yet be given, these further costs are unlikely to be less than £5million given the scale of the South of Whiston proposal, thereby generating a total infrastructure cost of not less than £20,300,000 which is equivalent to over £11,200 per dwelling. As the EVA report shows, such a level of infrastructure costs would not be viable with a requirement for 25% affordable housing. This is highly relevant to the generality of Policy CS15 because, firstly, there is no evidence that South of Whiston is untypical of the other large sustainable urban extensions in this respect; and secondly, the South of Whiston site constitutes such a large proportion of the total capacity coming forward from the sustainable urban extensions. If its development is stalled by unrealistic policy burdens, the policies of the Core Strategy will not be delivered.

- 2.2.6 In conclusion, the clear evidence is that a 25% affordable homes requirement is likely to jeopardise the viability of the Sustainable Urban Extensions, especially the larger sites, such as South of Whiston, where significant infrastructure will be required to bring the sites for development. In these circumstances, the requirement would be contrary to national policy.

2.2.7 For these reasons we consider that the proposed modification in this respect fails the tests of soundness.

### **2.3 MO78, M168 and M272: Former Saunders Garden Centre, Windy Arbor Road, Whiston**

2.3.1 The site of the former Saunders Garden Centre should be excluded from the South of Whiston Sustainable Urban Extension so that it can be brought forward immediately and not await the completion of the masterplanning exercise for the urban extension as currently required by the proposed modifications for Policy SUE2. This masterplanning exercise has not yet begun and there is no timetable yet for it.

2.3.2 The Saunders site is previously developed land. As such it is very different in character from the rest of the developable land within the proposed Sustainable Urban Extension which is predominantly greenfield agricultural land.

2.3.3 The site is a former retail garden centre which closed about 7 years ago. It is in a semi-derelict state and its unkempt appearance detracts from the amenity of the wider area.

2.3.4 The suitability of the site for housing development has been established for many years. As previously developed land, the principle of its redevelopment is in accordance with national and local green belt policy. The site was originally granted planning permission for housing development in 2010. Since then, the site has regularly formed part of the Council's five year supply of deliverable housing land. The site is therefore very different from the remainder of the developable parts of the South of Whiston site where the principle of development is dependent upon being identified by the Core Strategy as part of the sustainable urban extension.

- 2.3.5 The decision of the Council at a late stage to include the garden centre site within the South of Whiston site has important implications for its development because the current draft of Policy SUE2 would prevent it coming forward for housing except as part of a comprehensive proposal for the whole urban extension. This could delay its development for some time as the wider proposal is dependent upon the cooperation of a number of landowners and developers.
- 2.3.6 The inclusion of the garden centre site within the sustainable urban extension ignores the long history of acceptance by the Council that it is suitable for housing development as a standalone scheme. The decision also ignores the amenity and other benefits arising from the early redevelopment of the site, including its contribution to the five year supply and prioritising the use of previously developed land in accordance with national policy and guidance.
- 2.3.7 The Council has given no reasons why the site has been included in the sustainable urban extension when it has previously been treated as a separate site. As the history shows, it is capable of being developed independently. It is also not required to achieve a satisfactory comprehensive development of the wider area. The Council has already agreed the principle of an access to the south off Windy Arbor Road close to the junction with the M62, and to the north off Lickers Lane. There is no obvious reason why another access onto Windy Arbor Road is necessary or desirable.
- 2.3.8 In conclusion, there is no reason why the development of this previously developed site with its benefits for amenity and deliverable housing supply should be delayed until there is an approved masterplan for the whole of the proposed sustainable urban extension. Such a requirement fails key soundness tests of being justified and in accordance with national policy.

2.3.9 For these reasons we consider that the proposed modifications in this respect fail the tests of soundness and would be potentially unlawful

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council

#### **RETURNING THIS FORM**

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

#### **PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Ms	
Name	Jane Aspinall	
Job Title (if appropriate)	Planning Manager	
Organisation (if appropriate)	██ ██████████	
Postal Address	████████████████████ ██████████	
Postcode	██████████	
Telephone Number	██████████████████	
Email Address	██	
Preferred Method of Contact	email	

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M001 etc.

Policy Ref

Paragraph Ref

1.3 etc.

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

Proposed Modifications M001, M020, M022 and M024 are supported in providing clarification on the role of the Sustainable Urban Extensions, including the site East of Halewood.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014

## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M042

Policy Ref

CS1

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| c) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Sound? (see guidance note 2.3)             | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

We support the identification and allocation of the Sustainable Urban Extensions in Policy CS1 including the last East of Halewood which is required to meet identified needs for housing.

*Continue on a separate sheet if necessary...*



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- c) No, I do not want to participate at any further public hearing
- d) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014

## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
e) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input type="checkbox"/>
f) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input type="checkbox"/>

### **3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

We support the identification and allocation of the Sustainable Urban Extensions in Policy CS3 including the last East of Halewood which is required to meet identified needs for housing.

For the reasons we state in our response to Policy CS5 we do not consider that there is a requirement for Criterion 4 within the body of the policy and that this should be moved to the supporting text. There is therefore no need to cross reference Policy CS5 within the text of Policy CS3.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

e) No, I do not want to participate at any further public hearing

f) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014

## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M078

Policy Ref

CS5

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| g) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

This modification seeks to insert wording which is not in itself a “policy” and provides information. This text should be included in the supporting justification and is not necessary within the body of the policy.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014

## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M133 etc.

Policy Ref

Paragraph Ref

6.5 etc

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

We support the provision of clarification that the area priorities will apply to the Sustainable Urban Extensions in M133 and M166. However, as Policy CS5 is effectively a relatively standard Green Belt policy it is unclear why the reference to this policy is retained as the review is no longer (due to modifications to that policy) “in accordance” is incorrect and the policy does not now on its own seek to meet development needs (it is a policy of constraint).

We support the modification of the Halewood Map (6.4) as proposed by M167.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014

## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M168 etc

Policy Ref

Paragraph Ref

N/A

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| k) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| l) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

We support the amendments that are proposed through M168 which proposes the inclusion of an additional chapter to address the proposed Sustainable Urban Extensions.

We support the proposed wording of Policy SUE1 and the recognition that these sites are meeting needs during the current plan period and beyond and the implementation of the associated changes to the Green belt boundaries. We specifically support the inclusion of the East of Halewood site (criterion 1(g)) for a residential led development. Criterion 4 should be amended as it refers to “guidance” in policies SUE2 and SUE2a to 2c but this is policy and not guidance. Criterion 5 may not be necessary as by reference to the Policies Map and Policy CS5 it is apparent that this is a matter of fact rather than policy.

In terms of Policy SUE2, whilst we support the Policy in principle, the degree to which it adds value rather than simply repeats other policies is however unclear. It is apparent in terms of the detailed criteria that:

- 1(a) repeats Policy SD1
- 1(b) requires a comprehensive approach but this could be included within SUE1 and repeats Policy CS27
- 1(c) repeats Policy CS19
- 1(d) repeats Policy CS2

*Continue on a separate sheet if necessary...*



**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

1(e) repeats Policy SUE1

1(f) repeats Policy CS8 and CS21

1(g) repeats Policy CS7

1(h) repeats Policy CS20

1(i) repeats Policy CS24

2) makes reference to “indicative considerations” which are not in themselves policy and therefore this could be in the supporting text.

3) simply confirms the council will prepare SPD for certain sites which again is not in itself a policy and just is a statement of intent.

4) provides more detail on 1(b) as outlined above but this could be reasonably incorporated within Policy SUE1.

On this basis it is considered that a large part of this policy could be omitted or included within the supporting text, and that those parts which cannot, can be readily and more appropriately incorporated within Policy SUE1.

Policy SUE2b applies specifically to the land East of Halewood and is broadly supported, subject to the comments on SUE2 and associated references, and the matters below. It is known that part of the site is constrained by flooding but the degree to which this impacts upon the capacity of the site is not precisely known. It is considered that the site could readily accommodate 1200 to 1300 dwellings and that evidence has previously been submitted to the Inspector (see the Development Statement for this site (Examination Document RH26a).

*Continued...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014

It is therefore considered that the yield from this site should be identified to be **at least** 1200 dwellings rather than “approximately 1100 dwellings”. There is no evidence that indicates that this higher requirement cannot be achieved and indeed past masterplanning work has indicated that even taking into account the open space and flood mitigation requirements, a significantly higher yield can be achieved.

In addition to the proposed residential development it is considered that other uses may be appropriate on the southern portion of the site between Higher Road and the railway line to the south. The policy should be amended to make provision for the fact that some non-residential uses may be appropriate on the site. This would allow the SPD to provide guidance on what these may be and the circumstances in which they may be acceptable.

## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
m) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input type="checkbox"/>
n) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input type="checkbox"/>

### **3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

We support the deletion of the requirement to achieve the Code for Sustainable Homes, BREEAM and decentralised renewable and low carbon energy systems (see also M183, M208, M209, M210, M212, M215, and M217) and the removal of the requirement to achieve Building for Life and Lifetime Homes. We do not consider that those requirements could be justified and could adversely affect the deliverability and viability of new development.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

m) No, I do not want to participate at any further public hearing

n) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

#### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

#### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title		
Name	Andrew Thorley	Siân Butt
Job Title (if appropriate)		Assistant Planner
Organisation (if appropriate)	Taylor Wimpey UK Ltd	Pegasus Group
Postal Address		██████████ ████████████████████ ██████████
Postcode		██████████
Telephone Number		██████████
Email Address		██
Preferred Method of Contact		Email

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
a) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input type="checkbox"/>
b) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input type="checkbox"/>

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

Please see comments within enclosed letter.

Thank you

*Continue on a separate sheet if necessary...*

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

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- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature:



Date 13-11-14





expedient in terms of controlling the release of Green Belt land and minimising the delay in achieving adoption of the Core Strategy.

In accordance with the above modifications, the Council have included map extracts within the Proposed Modifications to the Policies Map document (CS10). TW support the modifications made and in particular support the addition of Map Extract 4 and the identification of the Edenhurst Avenue site for an SUE for residential removal including its removal from the Green Belt.

With regards to the Spatial Strategy for Knowsley (Policy CS1) and the Green Belt (Policy CS5), TW support the amendment to clause 'e' in Policy CS1 and the release of the SUE sites from the Green Belt at adoption in order to meet housing need and ensure an adequate supply of housing land and the amendment of clause 4 within Policy CS5 which confirms that a number of locations will be removed from the Green Belt to accommodate development needs. We also support the amendment made at paragraph 6.8 which reaffirms that the SUEs will be required to meet immediate development needs and as well as long term needs.

### **Housing Delivery**

With regards to the Council's 5 year land supply, we note that within the Inspector's Second Interim Findings (EX34), he has considered the Council's schedule of further modifications (CS08b) and the Council's revised approach to the calculation of a 5 year housing land supply and confirms he now finds this sound. The inclusion and allocation of the SUEs was justified through the examination process as it was confirmed that the Council were unable to demonstrate a 5 year land supply of deliverable housing sites as there were serious viability constraints with a number of the sites within the existing urban area.

We note and support the amendment made to paragraph 5.6 which states that the sites which have been removed from the Green Belt will help to ensure an adequate supply of land for housing and employment development. We also note the addition made to paragraph 5.23 which confirms the Council will review Policy CS3 (Housing Supply, Delivery and Distribution) when appropriate if there is an under-delivery of housing against the plan period target.

Policy CS3 provides further detail on the supply and phasing of land for new housing development, clause 3 confirms that land will be identified to ensure a five year supply of deliverable sites is maintained at all times and land within the SUEs will be released to subject to the requirements of Policies CS5 and SUE1 to SUE2c.

With regards to affordable housing, Policy CS15 (Delivering Affordable Housing) TW support the amendment made to clause 1 which reduces the provision of affordable housing sought within the urban area to 10%. It is accepted that there is generally a higher level of development viability in the proposed SUEs and therefore a higher rate of 25% affordable housing is generally acceptable within the SUEs. Taylor Wimpey also support recognition that viability will also be a key consideration for any individual case as set out at paragraph 7.6. We note the recommended tenure split stated in paragraph 7.8 however, TW consider that the existing housing mix in the area should be considered when assessing the amount and tenure of affordable housing in order to assist in creating mixed communities. A number of the proposed SUEs are adjacent to areas dominated by social rented properties and therefore in some instances it may be preferential for a development to provide a higher level of private, low cost for sale units to balance the housing

market. We note the Council's commitment to rebalancing the housing market is endorsed at paragraph 7.9.

### **Inclusion of Sustainable Urban Extensions**

Taylor Wimpey support the addition of Chapter 6A regarding SUEs and safeguarded land, in particular the inclusion of Edenhurst Avenue as an SUE within Policy SUE1. It is noted within the Inspector's second interim findings (EX34) that the Council's identification of SUEs and the removal of the phasing mechanism as stated within the Submission Document Incorporating Proposed Modifications (CS09) is now sound. It is noted and supported at paragraph 6A.16 that the SUEs will be released from the Green Belt and allocated on adoption of the Plan.

The 86 dwellings suggested by the Council on the allocation profiles within Appendix E is based on development just within Flood Zone 1. It should be noted that as part of any planning application a full Flood Risk Assessment would be carried out and therefore it may be possible that the site would be able to accommodate a greater number of dwellings than the figure proposed by the Council. We support the lack of a cap on the development capacity of the sites, indeed initial assessments carried out by TW indicate the developable area can be increased after mitigating flood risk which can be assessed at the application stage.

### **Conclusions**

This letter has reaffirmed Taylor Wimpey's support for the identification of Edenhurst Avenue as a Sustainable Urban Extension. We note the Inspector has considered a number of the proposed modifications and finds a number of the above sound (EX34). TW share the Inspector's view on the Council's amendments relating to the context of this letter.

We trust these representations are clear and outline our support for the Proposed Modifications to the Core Strategy and the examination process as a whole.

Should you have any questions regarding the above, please do not hesitate to contact me.

Yours sincerely



Sebastian Tibenham

**Planning Director**



**05 POLICY CS2**

**Representations Relating to Policy CS2: Development Principles**

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS2 001	1	88	Rachael Bust, The Coal Authority
<b>Total</b>	<b>1</b>		



The Coal  
Authority

**Knowsley Local Plan Core Strategy (Proposed Modifications)**

**Consultation Deadline – 13 November 2014**

Contact Details

Planning and Local Authority Liaison Department  
The Coal Authority



Planning Email:  
Planning Enquiries:



Person Making Comments



Consultant Planning Advisor to The Coal Authority

Date of Response

24 September 2004

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



### RETURNING THIS FORM

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Rachael Bust	
Job Title (if appropriate)	Chief Planner	
Organisation (if appropriate)	The Coal Authority	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
a) Legally Compliant? (see guidance note 2.2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Sound? (see guidance note 2.3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Coal Authority supports this modification

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

N/A

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

Signature

[Redacted Signature]

Date 24 September 2004

## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

---

Name and/or Organisation

The Coal Authority

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M225 (PM71)

Policy Ref

CS25

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| c) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Sound? (see guidance note 2.3)             | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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The Coal Authority supports this modification



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

N/A

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

c) No, I do not want to participate at any further public hearing

d) Yes, I wish to participate at any further public hearing

Signature

[Redacted Signature]

Date 24 September 2004

## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

The Coal Authority

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M272

Policy Ref

Appendix

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
e) Legally Compliant? (see guidance note 2.2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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The Coal Authority does not object to the allocation of the proposed Sustainable Urban Extensions. We note that SPDs are proposed to be produced for the Knowsley Lane, Huyton and South of Whiston and Land South of M62.

The proposed modifications relating to Policy CS2 and Policy CS25 do address our agreed position regarding mineral safeguarding and mining legacy. We note that some cross referencing is included within the new SUE policies to other plan policies.

However as specific Allocation Profiles are included within the Plan as a Modification we consider that the issue of mineral sterilisation prompting the need to consider the prior extraction of mineral resources and the presence of land instability should be identified in the 'Key Site Constraints and Opportunities' sections of relevant SUEs.

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

In the specific Allocation Profiles we consider that the issue of mineral sterilisation prompting the need to consider the prior extraction of mineral resources and the presence of land instability should be identified in the 'Key Site Constraints and Opportunities' sections of relevant SUEs. In particular this should be identified for the Knowsley Lane, Huyton and South of Whiston and Land South of M62 SUEs.

The Coal Authority considers this to be necessary as a result of this DPD now undertaking the allocation of these sites. The NPPF in paragraphs 109, 120, 121, 143, 144 and 166 requires this information to be taken into account in the site allocation process.

These issues will impact on the deliverability and viability of these SUEs.

As we have identified in our response to the consultation on the proposed SUE SPDs, The Coal Authority has made GIS data available to LPAs on these issues, the latest releases of this data was notified to Knowsley as being available to download on the 6 August 2014. This data does not yet appear to have been downloaded from our GIS portal. The nominated contact in Knowsley is [REDACTED], Principal Application Support Officer in GIS Management in Development Control.

It is important that you download and utilise this latest data as our records of surface coal resource and mining legacy change on a continuous basis as new information becomes available.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

e) No, I do not want to participate at any further public hearing

f) Yes, I wish to participate at any further public hearing

**Signature** [REDACTED]

**Date** 24 September 2004