



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications Consultation

Report of Representations - Volume 2

December 2014

Contents

| VOLUME | CHAPTER | CONTENTS |
|---------------|----------------|--------------------------|
| 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 |

06 POLICY CS3 TARGET

Representations relating to Policy CS3: Housing Supply, Delivery and Distribution, specifically relating to housing targets

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| L Addy | | | |
| L Barlow | | | |
| L Bolton | | | |
| L J Parsons | | | |
| L M Riley | | | |

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| | | | Laura Rafferty |
| | | | Laura Smith |
| | | | Laura Tremarco |
| | | | Lauren Dougherty |
| | | | Laurence Saunders |
| | | | Leah Robinson |
| | | | Leanne Ianson |
| | | | Lee Bassnett |
| | | | Lee Mansfield |
| | | | Lee Murphy |
| | | | Lee Walton |
| | | | Lee Wong |
| | | | Leeann Taylor |
| | | | Leila Evans |
| | | | Leo Snook |
| | | | Lesleyann McCormick |
| | | | Letitia Reeve |
| | | | Lewis Darwin |
| | | | Li Ming Wing |
| | | | Liam Murphy |
| | | | Linda A Birch |
| | | | Linda Marshall |
| | | | Linda Smethurst |
| | | | Linda Walton |
| | | | Linda Walton (2) |
| | | | Linda Whiley |
| | | | Llyod Driver |
| | | | Lois Shaw |
| | | | Lorcan Wardle |
| | | | Lorraine Kelly |
| | | | Loucas Anastasiou |
| | | | Louis Anastasiou |
| | | | Lucy A Parker |
| | | | Lucy Woods |
| | | | Lyndon James |
| | | | Lyndsey McMullin |
| | | | Lyndsey Seddon |
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| Lynn Paterson | | | |
| Lynn Taylor | | | |
| M A Weir | | | |
| M Baines | | | |

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| | | | M Gchoyd |
| | | | M Glachan |
| | | | M Howard |
| | | | M J Parsons |
| | | | M Jacks |
| | | | M L Neale |
| | | | M Lundy |
| | | | M Lunt |
| | | | M McDonnell |
| | | | M McDonnell |
| | | | M McGowan |
| | | | M Milne |
| | | | M Neely |
| | | | M Sweeney |
| | | | Malcolm Cox |
| | | | Malcolm Gorrie |
| | | | Malcolm Lawson |
| | | | Marcella Higgins |
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| | | | Margaret Holmes |
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| | | | Margaret Riley |
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| | | | Marie Grainger |
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| | | | Marie Williams |
| | | | Marilyn Beck |
| | | | Marion McCarthy |
| | | | Mark Beament |
| | | | Mark Billington |
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| | | | Mark Currie |
| | | | Mark Howorth |
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| Mark Lucy | | | |
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| | | | Maureen Healey |
| | | | Maureen Reynolds |
| | | | Mavis Monaghan |
| | | | Megan Banks |
| | | | Megan Coulter |
| | | | Melissa Murphy |
| | | | Michael Banks |
| | | | Michael Banks |
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| | | | Michael Jones |
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| | | | Michael McKenna |
| | | | Michael Paget |
| | | | Michael Parsons |
| | | | Michael Walberg |
| | | | Michael Warner |
| | | | Michelle Deane |
| | | | Michelle Deary |
| | | | Michelle Ditchfield |
| | | | Michelle Lenehan |
| | | | Michelle Walters |
| | | | Mike Owens |
| | | | Miss Fallon |
| | | | Miss Lloyd |
| | | | Miss Matthews |
| | | | Miss McArdle |
| | | | Miss Olivia |
| | | | Miss O'Neill |
| | | | Miss Tyrrell |
| | | | MJ Sheppard |
| Mohamed A Sadiq | | | |
| Monica Weld-Richards | | | |
| Morag Picton | | | |
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| | | | Mr and Mrs Pepper |
| | | | Mr and Mrs Tailer |
| | | | Mr and Mrs Wardle |
| | | | Mr Anthony |
| | | | Mr Brian |
| | | | Mr Byrne |
| | | | Mr C Hales |
| | | | Mr Carpenter |
| | | | Mr Davies |
| | | | Mr Derrick |
| | | | Mr Ditchfield |
| | | | Mr James |
| | | | Mr Jones A |
| | | | Mr Jones B |
| | | | Mr Jones B (2) |
| | | | Mr Keogan |
| | | | Mr Kirby |
| | | | Mr Lewis |
| | | | Mr Melia |
| | | | Mr Patterson |
| | | | Mr Paul |
| | | | Mr Renshall |
| | | | Mr Robert |
| | | | Mr Smith |
| | | | Mr Walsh |
| | | | Mr Weld-Richards |
| | | | Mr Williams |
| | | | Mrs Bedward |
| | | | Mrs Blakely |
| | | | Mrs Boardman |
| | | | Mrs Butchard |
| | | | Mrs Carol |
| | | | Mrs Derrick |
| | | | Mrs Greenhalgh |
| | | | Mrs Joan |
| | | | Mrs Lloyd |
| | | | Mrs Mandy |
| Mrs May | | | |
| Mrs Patricia | | | |
| Mrs Patterson | | | |
| Ms Hennieta | | | |
| Ms Mabley | | | |

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| (continued) | | | Ms Pauline |
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| | | | Nathan Cammack |
| | | | Neil Fitzmaurice |
| | | | Neil McGregor |
| | | | Nicola Woods |
| | | | Nigel Bain |
| | | | Norma Burns |
| | | | Olivia Kilgallon |
| | | | P Bates |
| | | | P Johnson |
| | | | P M Plummer & B C Plummer |
| | | | P Mohnahan |
| | | | P Mornelli |
| | | | P Smith |
| | | | P Sweeney |
| | | | P Sweeney |
| | | | P Wilson |
| | | | Pam Tinsley |
| | | | Pamela Ramos |
| | | | Pat Twist |
| | | | Pates O'Neill |
| | | | Patricia Ainsworth |
| | | | Patricia Healy |
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| | | | Patricia Thompson |
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| | | | Patrick Colligan |
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| | | | Paul Birch |
| | | | Paul Bowden |
| | | | Paul Donnelly |
| | | | Paul Durie |
| | | | Paul Fitzgerald |
| | | | Paul Higginson |
| | | | Paul Imman |
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| | | | Paul Johnson |
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| Paul McDonald | | | |
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| Paul Shaw | | | |

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| | | | Pauline Gunn |
| | | | Pauline Prayle |
| | | | Pauline Reddington |
| | | | Paulynn McCoag |
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| | | | Peter Ianson |
| | | | Peter McCabe |
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| | | | Peter Stewart |
| | | | Peter Taylor |
| | | | Phil Allan |
| | | | Philip Davies |
| | | | Philip McCulley |
| | | | Philip Shenton |
| | | | Phillip Clarke |
| | | | Phillip Smethurst |
| | | | R Allen |
| | | | R Bellion |
| | | | R Harrison |
| | | | R Holdsworth |
| | | | R L Barrett |
| | | | R P Davidson |
| | | | R Sweeney |
| | | | R Taylor |
| | | | R W Davies |
| | | | Rachael Davies |
| | | | Rachael Lacey |
| | | | Rachel Deane |
| | | | Rachel Smith |
| | | | Ray Dickinson |
| | | | Raymond Clarke |
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| | | | Rolf Rheinlander |
| | | | Ronnie McFarlane |
| | | | Rosaline Bullock |
| | | | Rosalyn Elizabeth Allan |
| | | | Rose Birchall |
| | | | Rose Moorcroft |
| | | | Rose Thompson |
| | | | Rosie Collins |
| | | | Roy Dixon |
| | | | Ruby Shaw |
| | | | Ruth Durie |
| | | | Ruth Neill |
| | | | S C Swift |
| | | | S Hales |
| | | | S Kirby |
| | | | S Matthew |
| | | | Sally Labor |
| | | | Sam Rawnsley |
| | | | Sandra Carter |
| | | | Sandra Greenhalgh |
| | | | Sarah Bowden |
| | | | Sarah Penrose |
| | | | Sarah Rawnsley |
| | | | Sarla Sinha |
| | | | Seana Kilgannon |
| | | | Sharon Roberts |
| | | | Shaun Currie |
| | | | Shaun Davidson |
| | | | Sheila Butterworth |
| | | | Sheila Flood |
| | | | Sheila Penrose |
| | | | Shirley Molyneux |
| | | | Shirley Taylor |
| | | | Sidney Rogers |
| | | | Simon Evans |
| | | | Simone Johanson |
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| Siu Wai | | | |
| Skye Blair-Porter | | | |
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| Sonja Thornton | | | |

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| | | | Stacy Dawber |
| | | | Stan Thornton |
| | | | Stanley Edwards |
| | | | Stanley Jones |
| | | | Stanley Penrose |
| | | | Stanley Seddon |
| | | | Stephanie Holcroft |
| | | | Stephen Banks |
| | | | Stephen Boyle |
| | | | Stephen Johnson |
| | | | Stephen Mansfield |
| | | | Stephen Marsh |
| | | | Stephen Mitchell |
| | | | Stephen Poole |
| | | | Stephen Walters |
| | | | Stephen William Doherty |
| | | | Stephens Evans |
| | | | Steve Williams |
| | | | Steven Caine |
| | | | Steven Rennison |
| | | | Sue LeBreton |
| | | | Susan Evans |
| | | | Susan Marie McGee |
| | | | Susan Murphy |
| | | | Susan Parr |
| | | | Suzanne McCormick |
| | | | Suzanne Morgan |
| | | | Suzanne Shaw |
| | | | Sylvia Brooks |
| | | | Sylvia Egan |
| | | | Sylvia Hoggarth |
| | | | Sylvia Parr |
| | | | Sylvia Vearncombe |
| | | | T McShane |
| | | | T Preece |
| | | | T Taylor |
| | | | Tanya Ashcroft |
| Tanya Beament | | | |
| Terence Baker | | | |
| Teresa Tilley | | | |
| Terry Rush | | | |
| Thelma Ennis | | | |

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| | | | Thomas Brewster Flynn |
| | | | Thomas Hogg |
| | | | Thomas Hughes |
| | | | Thomas LeBreton |
| | | | Thomas Lynskey |
| | | | Thomas Owens |
| | | | Thomas Thompson |
| | | | Thomas Tully |
| | | | Thomas Walton |
| | | | Tiffany McCulley |
| | | | Tina Rennison |
| | | | Tony Fitzmaurice |
| | | | Tony McCoag |
| | | | Tony Murphy |
| | | | Tony Shu |
| | | | Tracey Judge |
| | | | Tracey Rotheram |
| | | | Tracy Worthington |
| | | | V Barker |
| | | | Valerie Campbell |
| | | | Valerie Walsh |
| | | | Vera & Dave Brown |
| | | | Verna Wozek |
| | | | Veronica Mangan |
| | | | Vicki Bannon |
| | | | Vicky Sweeney |
| | | | Victoria Owen |
| | | | W Forehead |
| | | | W J Frost |
| | | | W Lunt |
| | | | W Walsh |
| | | | William B Hughes |
| | | | William Blackburn |
| | | | William Murphy |
| | | | William Woods |
| | | | Winifred McCabe |
| | | | Xander Blair-Porter |
| | | | Xavier Blair Porter |
| | | | Yvonne Dixon |
| Yvonne Smith | | | |
| Unknown (address only) x 12 | | | |
| Unknown (no address) x 6 | | | |
| | | | |

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| POLICY CS3 TARGET 092 | 1 | 365 | L J Rose |
| POLICY CS3 TARGET 093 | 1 | 367 | Laura Dono |
| POLICY CS3 TARGET 094 | 1 | 371 | Lee Wilder |
| POLICY CS3 TARGET 095 | 1 | 372 | Leonard Tran |
| POLICY CS3 TARGET 096 | 1 | 376 | Linda O'Connor |
| POLICY CS3 TARGET 097 | 1 | 382 | Lynn Warbrick |
| POLICY CS3 TARGET 098 | 1 | 383 | Lynne and Dave Berry |
| POLICY CS3 TARGET 099 | 1 | 386 | M E Wortley |
| POLICY CS3 TARGET 100 | 1 | 388 | M Hall |
| POLICY CS3 TARGET 101 | 1 | 390 | M Penn |
| POLICY CS3 TARGET 102 | 1 | 395 | Marc Robinson |
| POLICY CS3 TARGET 103 | 1 | 396 | Margaret Dolan |
| POLICY CS3 TARGET 104 | 1 | 399 | Margaret Jerabek |
| POLICY CS3 TARGET 105 | 1 | 400 | Margaret Matthews |
| POLICY CS3 TARGET 106 | 1 | 402 | Maria Town |
| POLICY CS3 TARGET 107 | 1 | 403 | Marie Ormond |
| POLICY CS3 TARGET 108 | 1 | 409 | Mark Lewis |
| POLICY CS3 TARGET 109 | 1 | 412 | Martin Parker (2) |
| POLICY CS3 TARGET 110 | 1 | 416 | Maureen Inman |
| POLICY CS3 TARGET 111 | 1 | 63 | Maurice Brown |
| POLICY CS3 TARGET 112 | 2 | 421 | Michael Gittens (1) |
| | | 421 | Michael Gittens (5) |
| POLICY CS3 TARGET 113 | 1 | 421 | Michael Gittens (4) |

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| POLICY CS3 TARGET 114 | 1 | 432 | Mr and Mrs Phillips |
| POLICY CS3 TARGET 115 | 1 | 439 | Neil Miney |
| POLICY CS3 TARGET 116 | 1 | 440 | Nichola Saunders |
| POLICY CS3 TARGET 117 | 1 | 448 | P E Prescott |
| POLICY CS3 TARGET 118 | 1 | 454 | Patricia McDonald-Holmes (4) |
| POLICY CS3 TARGET 119 | 1 | 461 | Paul Marshall |
| POLICY CS3 TARGET 120 | 2 | 5 | Paul Slater (1) |
| | | 5 | Paul Slater (2) |
| POLICY CS3 TARGET 121 | 1 | 465 | Paul Woods |
| POLICY CS3 TARGET 122 | 1 | 469 | Paula Robinson |
| POLICY CS3 TARGET 123 | 1 | 472 | Pauline Columbine |
| POLICY CS3 TARGET 124 | 1 | 483 | Philip Williamson |
| POLICY CS3 TARGET 125 | 1 | 487 | R McCauley, St. Helens |
| POLICY CS3 TARGET 126 | 1 | 488 | Rachel Freeman |
| POLICY CS3 TARGET 127 | 2 | 96 | Ray Davis (1) |
| | | 96 | Ray Davis (4) |
| POLICY CS3 TARGET 128 | 1 | 96 | Ray Davis (2) |
| POLICY CS3 TARGET 129 | 1 | 96 | Ray Davis (5) |
| POLICY CS3 TARGET 130 | 1 | 491 | Ray Gough |
| POLICY CS3 TARGET 131 | 1 | 492 | Raymond Beard |
| POLICY CS3 TARGET 132 | 1 | 493 | Raymond O'Neill |
| POLICY CS3 TARGET 133 | 1 | 494 | Richard George Robinson |
| POLICY CS3 TARGET 134 | 1 | 495 | Richard Hennity |
| POLICY CS3 TARGET 135 | 1 | 498 | Roberts |
| POLICY CS3 TARGET 136 | 1 | 504 | Roy Hardman |

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| POLICY CS3 TARGET 137 | 1 | 505 | Roy Turell |
| POLICY CS3 TARGET 138 | 1 | 507 | S B Allport |
| POLICY CS3 TARGET 139 | 1 | 508 | S Drakefield |
| POLICY CS3 TARGET 140 | 1 | 511 | S Stone |
| POLICY CS3 TARGET 141 | 1 | 512 | Sandra Cassidy |
| POLICY CS3 TARGET 142 | 1 | 516 | Sarah Hindley |
| POLICY CS3 TARGET 143 | 1 | 518 | Scott Cunningham |
| POLICY CS3 TARGET 144 | 1 | 520 | Sharon Murphy |
| POLICY CS3 TARGET 145 | 1 | 79 | Sheila Berry |
| POLICY CS3 TARGET 146 | 1 | 529 | Stephen Walsh |
| POLICY CS3 TARGET 147 | 1 | 542 | Suzanne Lewis |
| POLICY CS3 TARGET 148 | 1 | 545 | T E O'Conner |
| POLICY CS3 TARGET 149 | 1 | 549 | Thomas Roberts |
| POLICY CS3 TARGET 150 | 1 | 550 | Tina Cinnamond |
| POLICY CS3 TARGET 151 | 1 | 551 | Tina Cinnamond |
| POLICY CS3 TARGET 152 | 1 | 120 | Tony Docherty |
| POLICY CS3 TARGET 153 | 1 | 553 | Tracey Vickers |
| POLICY CS3 TARGET 154 | 1 | 558 | Valerie O'Neill |
| | | | |
| Total | 1073 | | |



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

Knowsley Council

RETURNING THIS FORM

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

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

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

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

PART A – PERSONAL DETAILS

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

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

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. A. E. SHERLOCK

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

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

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

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

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

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

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

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

Continue on a separate sheet if necessary...

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

T.

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

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

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

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

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

CONTINUED —

MR. A. E. SHERLOCK

CONT. -

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

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

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

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

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

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

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

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

Continue on a separate sheet if necessary...

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

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

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

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

HELP SAVE OUR GREEN BELT

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

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

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

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

JOHN BENNETT

MAUREEN STEWART

PETER RAYNOR

LINDA RAYNOR

Christine DeLeon

Michael DeLeon

Sara Ferrina

HARLY RUSH

MARIE RUSLI

James Rush

COLIN McNALLY

JANET McNALLY

MARTIN LAVELLE

BRENDA LAVELLE

Nicola Lavelle

Andrew Lavelle

Kyle Mogan

~~Ken Mogan~~

JOHN CRAWFORD

Margaret Mowat

Rachael King

Gary King

Daniel King

Shelia Petherick

E. Ridley

cat.

AGRAVE

Mrs Cuthbert

N W

K. HYLAND

L. ROBINSON

P. McCarroll

B. Cress

G. Green

R. McCarron

A. McCarron

Smearon

H. McCarron

P. McCarron

A. MCCARRON

P. White

K. Pat

SO Bin

For the
A. Carver

Dei

SAO

D. John

~~Cover~~

~~Dan~~

~~Law~~

78

AMC

as seen

Y. Johnson

LIT

Emma Tutton

W. MORSON

K. MORSON

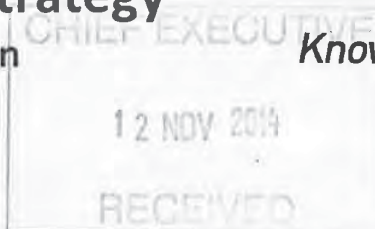
A. SHARLOCK



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



Knowsley Council

RETURNING THIS FORM

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

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

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

PART A – PERSONAL DETAILS

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

**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 WHISTON GREEN BELT.

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

Modification Ref

Policy Ref

KGBS 14

Paragraph Ref

EC1

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

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

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

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

Continue on a separate sheet if necessary...

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

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

Continue on a separate sheet if necessary...

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

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

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

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

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 | 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 | | |

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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.

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



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Signature



Date: 12th November 2014

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 | | |

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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

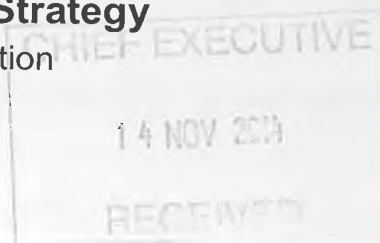
13th November 2014



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form



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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 | 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 | | |

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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.

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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.

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.

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



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council

12 NOV 2014

RECEIVED

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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|------------------------------|-----------------|
| Title | MR & MRS. ALBERT & MADELEINE | |
| Name | SHIPLEE | |
| 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

Whiston
South

Policy Ref

KCBS14

Paragraph Ref

37, 54, 55
E1 - E11

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.

We object to the plans to build 1503 dwellings on Greenbelt land in South Whiston, as we feel the local wildlife + greenspace is Whiston's greatest asset, and should not be sacrificed for another "estate". We are very concerned that Halsmead Park will be surrounded by a very busy ring-road. With the increase in people, we fear that the local doctors and hospital ~~also~~ will be unable to cope. The residents of Halsmead Park are mostly pensioners, and ^{cope} to live in a peaceful environment. The connecting road between the motorway and Whiston Village is already a race-track, and becomes blocked with traffic.

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.

While we don't support the plans for "this" new development, we do believe that some development of the area/ additional housing may be needed in the future. This growth should be slow and supported by growth of the local economy. We believe there are alternative brown-field sites locally which should be used for development, and keep the greenbelt untouched.

Continue on a separate sheet if necessary...

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

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

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

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

Signature



Date 1st November 2014
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 | MISS | |
| Name | AMANDA FLETCHER | |
| Job Title (if appropriate) | BUSINESS MANAGER | |
| Organisation (if appropriate) | LOCAL AUTHORITY | |
| 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

AMANDA FLETCHER

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

Modification Ref

Policy Ref

KG05/4

Paragraph Ref

EG

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 release of this land as the most part of the site is classified as Gnd 2 Best + Most Versatile agricultural land and some parts of the site has been farmed for years. None of the options will meet the objectives to restore the land + soil quality. This non soil has an important role to play in helping combat climate change. Thus contributing to meeting the governments emission reduction target + carbon budget.

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.

Erik Pickles issued 16.10.14 Instructions to Planners,
please take notice.

Take into account the latest population figures from the
ONS. we do not require to use Greenbelt as
efficient blanket within knowledge.

Resonance to public 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 are objecting to a modification to the Core Strategy and you wish to participate in any further public hearings, this confirmation will be used to provide evidence to the Examination Panel to determine whether there is a need for any further hearings to be held as part of the Examination of the Core Strategy.

Signature

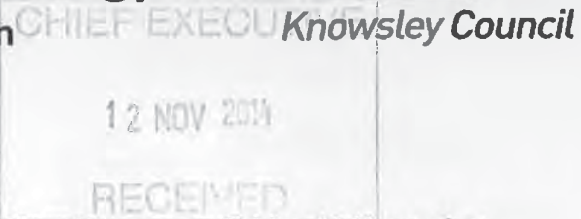
Date

1.11.14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MRS | |
| Name | ANITA SHAW | |
| Job Title (if appropriate) | STAFF NURSE | |
| Organisation (if appropriate) | MERSEY-CARE | |
| 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 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 believe this modification is not sound because it will cause encroachment into the countryside. It will increase dependency on car travel as the development of this land will be unsustainable. Our local services, schools and amenities will become overloaded and the development could seriously damage the character of Whiston. Adequacy of parking and noise and disturbance whilst development is taking place would have a significant negative impact on the community. It is urban sprawl not extension.

Continue on a separate sheet if necessary

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

Please take into account guidance from Eric Pickles MP Oct 16 2014. Greenbelt must be protected.

Re-convene public inspection carry out up to date transport survey.

Take into account ONS population figures for 2014

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

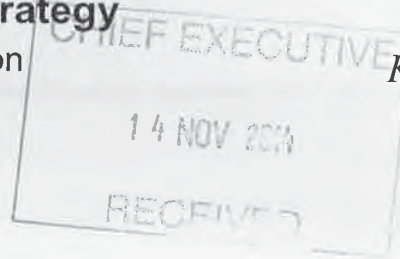
1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

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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 | Ann Reiberken | Middleton Solicitors |
| Job Title (if appropriate) | Retired | |
| Organisation (if appropriate) | | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save 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.

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

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Signature..... 

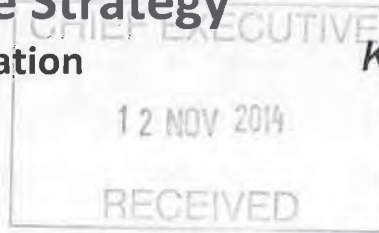
Date 12/11.....November 2014



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 | ANNE GIBBONS | |
| Job Title (if appropriate) | RETIRED | |
| Organisation (if appropriate) | | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

SAVE WHISTON GREEN BELT

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

Modification Ref

Policy Ref

KG-BS 14

Paragraph Ref

EE 1

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

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

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

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

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

Continue on a separate sheet if necessary...

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

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

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

Reconsider the public inspection.

Continue on a separate sheet if necessary...

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

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

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

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

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

1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | Ms | |
| Name | Anne Thornton | |
| 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

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 complaint.

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

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

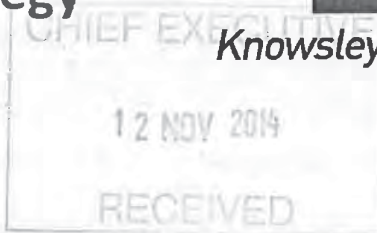
B Kirkwood





Knowsley 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 | MRS | |
| Name | BARBARA FAZAKERLEY | |
| 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

BARBARA FAZAKERLEY

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

I object because
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.

Continue on a separate sheet if necessary...

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

Carry out an up to date housing requirement taking into account latest figures from ONS
Take into account statement from Eric Pickles MP regarding the release of Greenbelt.
These are not exceptional circumstances.

Continue on a separate sheet if necessary...

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

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

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

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

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 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 | | |

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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 circumstances 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 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.

- 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 line 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



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 | [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

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

From: Ted Fowell [REDACTED]
Sent: 01 November 2014 20:01
To: [REDACTED]
Subject: Greenbelt Plan knowsley

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

I am writing to you in relation to the above, I am twenty years young and I believe what the councils are doing to reduce the amount of green belt land in our towns is really shocking.

I was reading in an online article that 'you have to meet the governments rules on housing in Britain' which I can totally agree with as their is a severe shortage however, destroying the green belt land is not the right way to go around it.

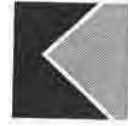
I understand if you have to meet the governments rules, can you not fight back to the government to say, the only reason that their is a shortage of houses In the area is because you opened the floodgates for illegal immigrants to come into our cities and towns and take properties (council ones) when their is people like myself, recently been made redundant from a 25k+ job and now I am currently sofa surfing. And unable to claim benefits as I don't have a fixed abode.

I must stress, Knowsley Council has not got a great name for itself compared to other councils in other neighbouring communities, please make yourselves stand out and say no to this outrages action against the green belt land and you may have some positive reviews from a lot mod locals throughout the towns.

Kindest Regards,

Bradley Fowell

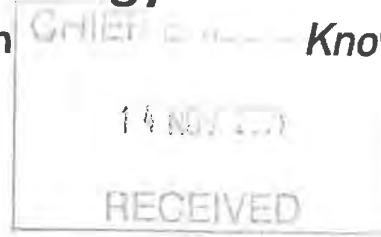
Sent from my iPad



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 | BRENDA ESPINOLA | |
| Job Title (if appropriate) | N/A | |
| 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 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 would object, to the release of this land as the majority of the site is classified as grade 2 best and most versatile agricultural land and that parts of the site have been farmed for many years. None of the options will meet the objective to restore land & 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} by 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 + carbon budgets introduced by the Climate Change Act 2008. Defra, Soils Policy team.

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 M.P. has recently advised planned to take more care of our greenbelt. - Listen to him & what he has to say.

- Take account of recent O.N.S. figures on population

- Re convene public inspection

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature

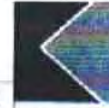


Date

Nov 1, 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 | Brian Corkill | |
| Job Title (if appropriate) | | |
| Organisation (if appropriate) | | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation **Mr. Brian Corkill**

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

| | | | | | |
|------------------|--------------------------------------|------------|--------------------------------|---------------|--------------------------------------|
| Modification Ref | CS 5 SUE 1 SUE 2 / 2a | Policy Ref | Mo 78 M168 M272 | Paragraph Ref | Page 14 Map 8 1&2 |
|------------------|--------------------------------------|------------|--------------------------------|---------------|--------------------------------------|

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.

To build such a large number of dwelling houses on the Whiston Green Belt causes harm to the community. The Township does not wish to lose it's identity by urban sprawl. The nearest school is already full, the local road network, constricted by the presence of the M57 and M62, is already congested and the Council does not appear to have much control over how many houses will be built in a given time. Once the land has been released for use, the building companies appear to have far too much freedom over every aspect and the resources of the area will be impaired for all users, not just the new home owners.

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.

With regard to the modification which declassifies the Whiston Green Belt, I strongly object to the underhand way in which laws have been over ruled and the concept of Green Belt land being concreted over. The idea of setting aside country areas has not changed. The purpose of such reserved space is still very valid. Their aim was to prevent urban sprawl and to retain the identities of communities.

This land is part of the approach to Liverpool and as such should be maintained as a green corridor. With leisure and health related activities being promoted, this land is part of our children's heritage and should not be taken from them. I enclose a letter which is to be sent to various bodies to draw attention to the bullying tactics which over ride the wishes of the Borough Council and the Whiston Town Council. This in light of plans to give more decision making power to the regions makes the concept a joke.

Letter attached

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 13th November 2014

SAVE THE WHISTON GREEN BELT!

☞ THE PROBLEM. ☞

Whiston is a small Township located in the Borough of Knowsley, one of the five areas which make up the Merseyside region.

Whiston has its own Town Council and the overall management of the area is undertaken by Knowsley M.B.C. who's other responsibilities include the provision of services for Huyton, Prescott, Kirkby and Halewood, along with other small communities.

Knowsley Council has been instructed by the powers that be in London, to release land for the building of new dwelling houses within its boundary and the Council duly located suitable sites. We have been informed that the amount of land earmarked for development is insufficient and that the Whiston Green Belt must be declassified and sacrificed for housing.

This decision has been made by a non elected Inspector who does not live in this area and he has not shown how his requirements have been calculated.

Both Whiston and Knowsley Councils have objected to the proposal and yet the pressure is on with threats of penalties if the land is not released.

With sweet talk about more decision making being carried out at a local level, this act of vandalism makes a mockery of a supposed democratic society. People are losing faith in politicians and in this area where even the elected Government failed to disclose these plans in its manifesto, the turnout can only get worse.

As both elected local Councils oppose the loss of this important stretch of countryside, there is no point in complaining to them. In desperation we have to draw attention to this removal of open countryside to those in a higher position and hope that you can help us to retain this open space for future generations. In the words of the adverts "When it's gone, it's gone".

SAVE THE WHISTON GREEN BELT!

∞ THE OBJECTIONS. ∞

- 1. The Township of Whiston was seriously cut up by the building of the M57 and the M62 and many rights of way were lost for leisure and travel purposes at that time.**
- 2. The two Motorways give a green approach into the City of Liverpool and this will be lost if the Whiston Green Belt is buried under concrete.**
- 3. The idea of a green belt is to prevent urban sprawl and give areas their own identity. This should still apply.**
- 4. The sheer number of houses proposed is a threat to local community spirit and way of life. We have 16,000 houses and the proposal is to build a further 1,506 new homes! This is a ridiculous ratio to be absorbed by a small township.**
- 5. Knowsley is a special case and should not be set targets at random. Knowsley has the highest ratio of rented property as opposed to owner occupiers.**
- 6. Knowsley is near the top of the unemployment tables. Knowsley has only recently climbed out of the bottom three most under achieving educational authorities. Knowsley is classified as a deprived area with free school meal numbers and foodbanks to confirm this. Knowsley has one of the lowest life expectancies in the country.**
- 7. Together these interrelated statistics would indicate that the 1,506 new homes will not be within reach of Knowsley residents. More likely outsiders will use the motorways to travel away from the area to their place of employment. If this is the case why do we have to lose our precious facilities.**
- 8. The housing requirements should be looked at for the whole region which consists of the Merseyside five Boroughs.**
- 9. Has the proposed new Runcorn Bridge been taken into consideration? This will change the pattern of housing requirements with workers on the Wirral and in Cheshire.**
- 10. Numerous housing developments have recently been built and others are nearly ready to start. Have these been deducted from the proposed totals? Prescot has a development in hand and a demolished factory social club and a decommissioned secondary school can take housing.**

OBJECTIONS TO THE LOSS OF THE WHISTON GREEN BELT (CONTINUED)

11. With the housing proposals should come a serious appraisal of the existing infra-structure?

The nearest school is a mile away and is full.

There are no shops, bus stations, medical provisions or schools on the proposed building area. Who will provide any of the facilities needed by 3,000 people plus children? It is highly improbable that get rich quick house builders will waste land, time and money on providing community halls, sports areas and playgrounds for the new estate. Existing facilities can not be shared out by such a large influx.

The road network is restricted by the two motorways, M57 and M62), and already fails to cope at certain times of the day. Another five hundred cars can not be absorbed into the main road network in Whiston.

Sewage facilities, water supplies and electricity will need major upgrades to meet demand and even cable television and land line telephone systems can not just add on such large numbers of new users. Will the GPO bother to fit post boxes for residents?

12. This land has been earmarked for footpath and cycle tracks and the Highways Agency built a pedestrian bridge over the M62 at great expense, to link up our Stadt Moers country park with a local footpath going into the old Cronton Colliery Site. This uses the old colliery mineral line.

13. Knowsley M.B.C. has indicated that brown field sites are becoming available but the Inspector over-ruled these as not being available immediately. If this is the case a simple deferment of parts of the plan would save the precious green belt land.

14. A study made a couple of years ago inferred that children who lived near motorways were in danger of having their mental facilities slightly retarded due to vehicle pollution. If this is the case areas adjacent to the M62 are unsuitable anyway.

32



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
- > 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 | 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 | | |

**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 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)

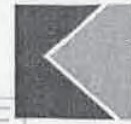
a) No, I do not want to participate at any further public hearing

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

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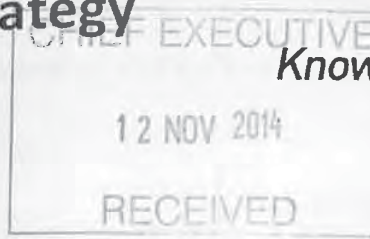
Signature. 

Date 12/11/14 November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

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

Continue on a separate sheet if necessary...

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

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

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

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

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

WE NEED YOU TO RECONVENE A PUBLIC INSPECTION Continue on a separate sheet if necessary...

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

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

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

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

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

Signature



Date 1-31-2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE **Knowsley Council**

12 NOV 2014

RECEIVED

RETURNING THIS FORM

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

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

PART A – PERSONAL DETAILS

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

KGB 14

Policy Ref

EC 1

Paragraph Ref

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

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

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

• The protection of GREEN BELT LAND!

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

Our local character will be lost for ever.

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

Continue on a separate sheet if necessary...

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

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

Continue on a separate sheet if necessary...

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

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

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

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

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

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; Reps -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.*

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

Continue on a separate sheet if necessary...

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

Continue on a separate sheet if necessary...

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

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Signature

Date

RE: THE KNOWSLEY LOCAL PLAN: CORE STRATEGY AND POLICY SUE2

ADVICE

1. I am asked to advise on an issue which has arisen in respect of the latest proposed form of policy SUE2 of the Knowsley Local Plan Core Strategy.
2. My Instructing Planner is acting on behalf of clients who are promoting the development of land South of Whiston and South of the M62 in Knowsley. Both areas of land are proposed to be taken out of the Green Belt and allocated in the Core Strategy as Sustainable Urban Extensions (“SUE”).
3. The policy contains some detail about how applications for planning permission in those (and other) SUEs will be treated. This largely consists of referring to issues that would be material considerations in any planning decision and giving cross-references to other plan policies. Masterplans are to be prepared, as are Supplementary Planning Documents.
4. Part 2 of policy SUE2 would provide that “Indicative considerations applicable to the sustainable development of each SUE are listed at Appendix E ‘Sustainable Urban Extension Allocation Profiles’”. However, Appendix E gives very little information. For each of the SUEs in which my client is interested, the appendix gives details of site location, size and capacity and then refers to flood zones, wildlife sites, urban green space and the need to connect to extant urban development. Importantly, appendix E is introduced with a statement that whilst

the appendix sets out key planning constraints and opportunities, the items listed are not exhaustive and other considerations are likely to apply.

5. Part 3 of policy SUE2 states that for each SUE, the Council will prepare a Supplementary Planning Document (“SPD”) which will set out a proposed spatial framework, together with “further details of development and infrastructure requirements”.
6. I am asked whether there is a risk that the proposed SPDs would be unlawful. I think that there is. I say that for the following reasons.
7. The Town and Country Planning (Local Planning) Regulations 2012 set out, rather tortuously, what documents can and cannot be SPDs. They do so in a most convoluted way.
8. Regulation 2 of the 2012 Regulations sets out a definition of “Local Plan” as being any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv) or 5(2)(a) or (b), and requires such documents to be prepared as a development plan document. For some unknown reason, that definition is repeated in identical terms in Regulation 6.
9. The 2012 Regulations define an SPD as any document of a description referred to in regulation 5 (except an adopted policies map or a statement of community involvement) which is not a local plan. For all practical purposes, that means that only a document which falls within the scope of Regulation 5(1)(a)(iii) can be an

SPD. No other document can be an SPD because it will either (i) not be within the scope of Regulation 5 at all, or (ii) be within the scope of Regulation 5 but is a local plan: see *R (RWE NPower Renewables Limited) v Milton Keynes BC and another* [2013] EWHC 751 (Admin) at [28].

10. A document does not come within the scope of Regulation 5 at all if it merely repeats Development Plan policy for background information or for clarity of presentation and Regulation 5 is concerned with *new* statements of policy: *RWE NPower* at [67].
11. The difficulty is caused in this case by the vagueness of what the Development Plan leaves as the potential content of the SPD. The warning that the information in the plan and its Appendix E is not comprehensive runs the real risk that new statements could be set out in the SPD for the first time and it cannot be said that the SPD would simply repeat the Development Plan policy for clarity or background. So much is, I think, clear from the introductory words of caution in Appendix E and the generality of the content of policy SUE2 itself.
12. If that is so, one has to consider whether the SPD might contain provisions which fall within the definition of a local plan. It is clear that the SPD would not contain new site allocations because that is an issue about which policy SUE2 is sufficiently clear. There is therefore no need to consider Regulation 5(1)(a)(ii), aspects of (iv) or 5(2)(b) any further.

13. Regulation 5(1)(a)(i) applies to documents which contain statements about “the development and use of land which the local planning authority wish to encourage during any specified period”. The Courts have emphasised the references to encouragement and to a specified period: *Miller Homes Limited v Leeds City Council* [2014] EWHC 82 (Admin) at [24]¹. There must be a real risk, given the current terms of the Core Strategy, that the SPD would contain new statements which fall within this classification.

14. Further, Regulation 5(1)(a)(iv) has the effect of providing that a document will be a local plan and has to be prepared as a DPD if it contains statements about “development management policies, which are intended to guide the determination of applications for planning permission.” The Courts have held that the important consideration is whether the policy is designed to regulate the use of land: see *RWE NPower* at [75] and *Miller Homes* at [37]. Given the indications in the Core Strategy of what the SPD might deal with, there must be a real risk that the purported SPD would contain new statements of policy which regulate the development of the SUEs.

15. In short, the only document which could lawfully be an SPD connected to policy SUE2 would be one which fell within the scope of Regulation 5(1)(a)(iii) of the 2012 Regulations, namely a document containing statements about “any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i)”. I do not believe that it can be said that SPD would be bound to fall within this

¹ It should be acknowledged that this case is the subject of an appeal to the Court of Appeal which has a date for a hearing fixed in March 2015.

category, given that policy SUE2 part 3 states that the SPD will contain a spatial development framework and further details of development and infrastructure requirements. It seems to me that the draft Core Strategy envisages the SPD going beyond what is within the lawful scope of an SPD.

16. I therefore conclude that on the basis of the presently proposed terms of policy SUE2, there is a very real risk that any purported SPD would go beyond the lawful scope of an SPD and would enter territory which can only be covered by a Development Plan Document.

17. Indeed, the matter goes further than that. The lack of clarity in the proposed policy itself means that the policy itself may be unlawful. That is because part 3 of policy SUE2 vaguely refers to the provision of “further details of development requirements” being set out in the SPD. That approach, depending upon what those words intend and the proposed content of the SPD, runs the risk of falling foul of the principle that a Development Plan Document cannot choose to exclude from it policy provisions which the plan maker intends to guide decision-making: see *Westminster City Council v Great Portland Estates* (1985) AC 636 at page 674E where Lord Scarman said:

“If a local planning authority has proposals of policy for the development and use of land in its area which it chooses to exclude from the plan, it is, in my judgment, failing in its statutory duty.”

18. I accept that SPDs can be used to prescribe further detail to a policy set out in the DPD², but the vagueness of part 3 of SUE2 means that it cannot be said that SUE2 prescribes the policy requirements at a general level and the SPD would only set out further detail. I think the wording of SUE2 opens the risk that an SPD might contain new statements of policy, not foreshadowed in the Core Strategy and which would not be tested by any examination of their soundness.

19. I trust that I have dealt with all of the matters upon which my view was sought. If I can be of any further assistance, then my Instructing Planner must not hesitate to contact me in Chambers.

MARTIN CARTER
20th October 2014.

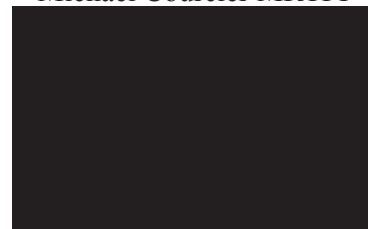
Kings Chambers
Manchester – Leeds – Birmingham.

² E.g, *Simplex (GE) Holdings Limited v SoSE* [1988] JPL 809; and *Watson v Essex CC* [2002] EWHC 669 (Admin).

RE: THE KNOWSLEY CORE
STRATEGY AND POLICY SUE2

ADVICE

Michael Courcier MRTPI



KNOWSLEY LOCAL PLAN CORE STRATEGY EXAMINATION
PROPOSED MODIFICATIONS TO SUBMISSION DOCUMENTS
REPRESENTATIONS BY BARTON WILLMORE
ON BEHALF OF JUNCTION PROPERTY LTD
NOVEMBER 2014

1 Supporting Representations

1.1 Junction Property Ltd (JPL) supports most of the proposed modifications now being suggested by the Council.

1.2 JPL welcomes in particular the following proposed modifications for the reasons given in evidence to the hearing sessions:

MO42 The removal of the Sustainable Urban Extensions from the Green Belt and their allocation for development as part of the spatial strategy identified in Policy CS1 and its accompanying text.

MO55 Acceptance of the Sedgfield 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

From: claire madeloso [REDACTED]
Sent: 09 November 2014 20:39
To: [REDACTED]
Subject: Halewood Greenbelt Development

Follow Up Flag: Follow up
Flag Status: Flagged

Claire Madeloso
[REDACTED]

To Whom It May Concern.

I am sending this email in regard to the above subject. As a Halewood resident, I feel that the consultation process for the proposed building works has been extremely limited, and has failed to take account of local needs and opinions. Even meetings that have been held to allow people to offer an opinion have been poorly advertised, and often taken place during times when many people would be at work, or would be more likely to have childcare issues.

The factors that I would like to address in this representation are as follows;

1. Strain on local resources. Halewood C of E is a one form entry Church of England school, plantation is close to its total number of students, St Marks is a small catholic school. There is also only 1 local secondary school that draws from a wide catchment and will not offer maximum choice to parents, whilst its sixth form provision is extremely limited. The local resources in terms of shops, a reduction in the number of buses coming to Halewood, and the proposed number of homes to be built do not appear to have taken these issues into consideration.
2. There has been no justification published for the number of houses that are proposed for the development. How has the figure / need been determined? Why does the development need to take place on green belt land?
3. Population growth in Halewood does not show the need for the amount of homes that are due to be built. This negates the need to build on green belt land.
4. Local roads and infrastructure will not be able to support the number of cars / commuters that are likely to move into the area with the development. This will eventually lead to further development / disruption in the local area. Local air pollution will also have a detrimental impact on residents.
5. Traffic congestion will cause disruption during and after building is complete.
6. The countryside within the local area will clearly be affected.
7. High quality farmland will be affected. This will disrupt local landowners and businesses, as well as supply of high quality produce that comes from the local area.
8. Natural habitats will be disrupted resulting in the loss and migration of local flora and fauna. This is unlikely ever to be replaced in the future.

I would be grateful for an email to acknowledge the receipt of this representation, and I am willing to discuss my opposition to the development further. I hope the elected members of the local council have the sense and decency to ensure that they listen fully to the views of local residents before they make an irreversible decision regarding the future of our community.

Yours faithfully,

Claire Madeloso



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
- > 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 | 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.*

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 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

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 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 | Daniel Smith | Middleton Solicitors |
| Job Title (if appropriate) | Incompetence | |
| 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

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...

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 yes

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



PRESCOT TOWN COUNCIL

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

13th November 2014

Dear Sir / Madam

I have been instructed by the elected members of Prescott Town Council to submit an objection to the realisation of Green Belt land with the Township of Prescott, namely

Land bounded by A58, Prescott – Known locally as Whittaker's Triangle

And

Carr Lane, Prescott

Reasons for the objection are detailed below.

Current Level of Housing Development

Over the last 7 years the town of Prescott has seen a considerable number of residential developments granted planning permission which have or will increase the housing stock within the town by some 399 properties. Many of these properties have remained unsold with developers halting construction on numerous occasions such as the Taylor Woodrow site on Steley Way. In addition to this the land between South Avenue and the industrial estate is already allocated for housing development.

The Town Council would therefore question the requirement for additional housing stock with the town, until such a time as demand for additional housing can be evidenced.

Green Belt Concerns

Prescot sits within an area deficient in Green Space as identified under Knowsley's Green Space Strategy. Green Space plays a vital part within communities providing a wide range of ecological, social and environmental benefits.

A recent study carried out by Exeter Medical School, showed that people who move to greener areas experience significant and long-lasting mental health improvement. Dr Ian Alcock, a research fellow at Exeter's Medical School added:

"These findings are important for urban planners thinking about introducing new Green Spaces to our towns and cities, suggesting they could provide long term and sustained benefits for local communities."

In addition to this, Communities Secretary 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.

The area of land bounded by A58, Prescot – known locally as Whittaker's Triangle currently contains playing fields for the local Centre for Learning and is also well used by the local community. There is no other land that could be used as a practical alternative by the school or the local community.

Furthermore the negative environmental effects of building on Green Belt land are considerable as not only are the 'Green Lungs' of the area removed but they are replaced with carbon emitting housing massively increasing the level of air pollution in the area. The additional road traffic would also increase the level of air pollution in what is a currently smoke controlled area.

Given the views above the Town Council believe the loss of any of the town's Green Belt land would highly detrimental to the Town on an ecological, social and environmental basis.

Highways Concerns

With regard to future residential development of both the sites the Town Council would raise great concerns over the access and egress from the existing highways. Carr Lane is already a busy road and the addition of increased traffic as a result of residential dwellings will only provide further congestion along that route. The land bounded by A58, Prescot – known locally as Whittaker's Triangle would present an even greater problem as this is bounded on one side by the A58 Prescot by pass and by the A57 Liverpool Road both of which are major transport routes into and around Prescot. The only other access point would be from Knowsley Park Lane, which is already extremely congested as this is the only access road to Knowsley Park Centre for Learning. Knowsley Park Lane is a residential street and would not be suitable for access to the identified 133 dwellings on this site.

The Town Council would therefore submit objections of the basis of highways safety.

Loss of Identifiable Boundaries

The Town Council also believe that the removal of the two identified Green Belt areas especially the land bounded by A58, Prescot will result in the loss of the identifiable Town Boundary. Prescot has a unique history within Knowsley and the loss of the Green Belt will effectively eradicate the natural boundaries of the Town which help to identify it from North Huyton (Longview).

The Town of Prescot has a unique history within Knowsley and residents of Prescot feel very strongly about preserving its identity. The Town Council recognise and welcome this local pride and would therefore be opposed to any plans that would remove the identifiable boundaries of the Town.

Available Brown Field Sites

The Town Council are aware of a number of brown field sites with the town and would ask that these sites are fully considered for housing development before any thought is given the realise of Green Belt land.

I hope you will consider the points made above.

Yours Sincerely



Daniel Wilson
Town Clerk



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



Knowsley Council

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

PART A – PERSONAL DETAILS

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

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

DARREN SEDDON

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

Modification Ref

Policy Ref

WGRS14

Paragraph Ref

EC3

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

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

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

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

Continue on a separate sheet if necessary

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

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

Continue on a separate sheet if necessary

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

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

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

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

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Signature



Date

1/11/14



Knowsley Council

Knowsley Local Plan: Core Strategy

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 | | |

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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.

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.

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...

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... 

P. D. BLINCOU

Date.....¹³.....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 | David Holmes | |
| Job Title (if appropriate) | Designer / Lecturer | |
| Organisation (if appropriate) | | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

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 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

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...



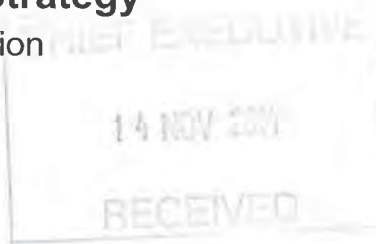
Date... 12th November 2014



Knowsley 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.

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.

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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...12th...November 2014

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



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 DOROTHY WOOD | |
| Name | | |
| 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

DOROTHY WOOD

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

Modification Ref

Policy Ref

KCBS 14

Paragraph Ref

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 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.

TRAFFIC IN POTTERY LANE IS VERY BAD ALREADY.
I AM VISUALLY IMPAIRED AND FIND IT VERY
DIFFICULT AND IT WILL JUST GET WORSE
WITH THE DEVELOPMENT.

SCHOOLS ARE FULL NOW AND THIS WOULD LEAD
TO MORE TRAFFIC

1500 HOUSES COULD GENERATE MORE TRAFFIC
WITH MAYBE TWO CARS PER HOUSE.

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 GOVERNMENT WOULD NEED TO PUT A LOT OF MONEY INTO THE PLAN. WE NEED TO KEEP WHISTON'S GREENBELT (PICKLES 2014) NEW SURVEY NEEDED TO FIND OUT WHAT NEEDS REAL ARE

Continue on a separate sheet if necessary...

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

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

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

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

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Signature

[Redacted Signature]

Date

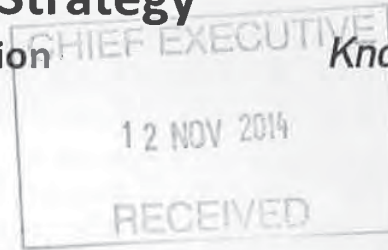
1/11/2014



Knowsley Local Plan: Core Strategy

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PART A – PERSONAL DETAILS

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

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation Elaine Rowe

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

Modification Ref MOSS
MOGS Policy Ref 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

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Signature



Date

1/11/14



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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MRS | |
| Name | FRANCES DOURAS | |
| 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 FRANCES DOURAS

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

Modification Ref WHITTON
SOUTH Policy Ref KGBS 14 Paragraph Ref E2
E1.57 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"/> |
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- Building at these sites will have an adverse effect upon farmland wildlife, especially declining species such as Skylark, Yellow hammer, Partridge and Hare.
- The development proposed will result in encroachment into the countryside.
- * The additional houses will increase traffic on the local road networks which are already unable to cope with the volume of traffic.
- Schools are already overcrowded.

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 COMMENTS FROM
ERIC PICKLES

TAKE ONS POP

RECONVENE PUB INSP

USE EMPTY HOUSES

Continue on a separate sheet if necessary...

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Signature



Date

1-11-14.

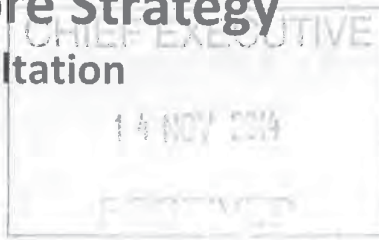


Knowsley Council

Knowsley Local Plan: Core Strategy

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

PART A – PERSONAL DETAILS

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

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation FRANES PARBY

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

Modification Ref AD51 Policy Ref HGBS14 Paragraph Ref
land south of 62

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

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

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

OBJECTION
NOT POSITIVELY PREPARED
Supposedly based on assessed needs of the area.
But councillors admitted they do not really know
how many houses will be build. Nor where
the people will come from to fill the houses.
Not looked at how it will affect surrounding
areas e.g traffic, schools, doctors, hospital etc
NOT JUSTIFIED
Local communities not sufficiently targeted.
Many people still have no idea it is going on.
Many information brochures were not received
by house holds - Jonathan Clark aware of this.
People can't object if they don't know about it

Continue on a separate sheet if necessary...

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

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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?
1503?
- 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 | Francis Moore. | |
| Job Title (if appropriate) | Personal Trainer. | |
| 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 Am a qualified Football Coach and personal trainer. The loss of the greenbelt land will affect the whole community who regularly use the open spaces of whiston for sport and recreation. The land is fully utilised and is not derelict. There are other areas of land in the area which have been used before. These are smaller areas but could house the local community. These Brown belt sites have not been developed for a number of years. These sites should be fully utilised. The business parks stand empty with empty land and units.

Continue on a separate sheet if necessary...

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

The plan has not been positively prepared as it does not take into account the Communities wishes. The Plan is not justified as the population in Knowsley has decreased and there is no justification for an estate of this size to satisfy the needs of the community affected by it.

The plan will not be effective in making the community a better place to live as the proposed use of our greenbelt is detrimental to the community.

The plan is not consistent with national policy as the governments own guidelines state that the use of greenbelt land should be a last resort and there is sufficient brownbelt land to meet the needs of the community. Continue on a separate sheet if necessary... Inspector must say No.

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

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

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

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Signature

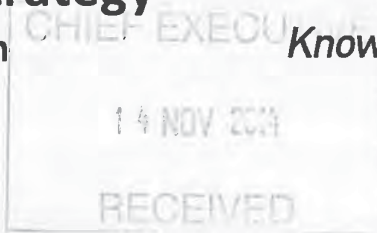


Date 3/10/2014



Knowsley Local Plan: Core Strategy

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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MR. | |
| Name | GARY BERRY | |
| 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.

OBJECTION

Parts of the site have been farmed for years. The majority of the area has been classified as grade 2 "best and most versatile agricultural land".

None of the options will meet the objective to restore land and soil quality.

Soil has a vital role to play in helping to combat climate change as UK soils store over 10 billions tonnes of carbon.

See climate change act 2008, the governments emission reduction targets + carbon budgets.

Continue on a separate sheet if necessary...

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

Please listen to Eric Riddles (M.P.)
advice to planners to take care of our
greenbelt.

Take account of recent O.N.S.
figures on population.

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



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 | | |

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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

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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 KEWLEY | |
| Job Title (if appropriate) | CIVIL SERVANT | |
| 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

Development on greenbelt Knowsley lane

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.

ITS not legal as building on greenbelt is only acceptable in exceptional circumstances. Knowsley Council have failed to prove this criteria.

There has been recent building in the area resulting in a huge increase of traffic, pollution and litter.

Knowsley lane is already very busy with cars speeding and this will only increase. We also use the memorial field for football as well as other activities. There are numerous Wildlife including Buzzards nesting on the memorial field.

I fear for the health & safety of my family and child.

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.

Find other land which could be redeveloped
or re think the housing Quota.

Its a known fact the population of Knowsley
has decreased over recent years.

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 14/11/14



HOUSE OF COMMONS

Local Plan Team
 Knowsley MBC
 1st 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,

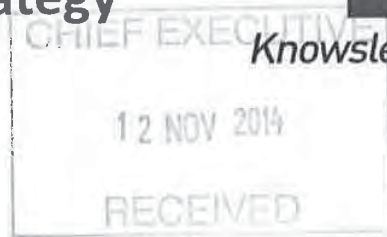
A large black rectangular redaction box covering the signature of Rt Hon George Howarth MP.

Rt Hon George Howarth MP.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

RETURNING THIS FORM

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

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

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

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MR | |
| Name | 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 MO55
NO 65 Policy Ref CS1 TO CS5
SUE AD51 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) | <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 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 AD51 AND THE SUE DOCUMENTS ARE OUT OF STEP WITH PUBLIC OPINION. I WOULD ASK THAT THE PUBLIC MEETINGS WITH INSPECTORS BE RECONVENED 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

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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 | [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

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...

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.....November 2014



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PART A - PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|-------------------------------|--|----------------------|
| Title | Mrs | Solicitor |
| Name | Cillian 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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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

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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 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.

Would like Knowsley Village to stay a small Village and not a housing Estate.
Keep it in the Green Belt. We dont want to loose 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...



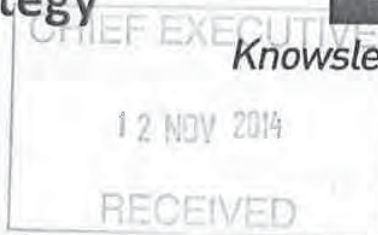
Date... 12th November 2014

Knowsley Local Plan: Core Strategy

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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | Miss | |
| Name | Gina O'Dowd | |
| Job Title (if appropriate) | Staff Nurse | |
| Organisation (if appropriate) | NHS - Whiston | |
| 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

Gina O'Dowd - local resident

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

Modification Ref

KG B514

Policy Ref

~~KG B514~~

Paragraph Ref

E2

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 local plan as there are more children in Knowsley fed by Foodbanks than anywhere else in the North West of England. I feel more investment and support needs to be ringfenced for agricultural development and education to enable resilient and sustainable communities. I also feel strongly that the local character and natural landscape of South Whiston stem from the early 12th Century. 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.

Continue on a separate sheet if necessary...

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

MP Eric Pickles (~~recently~~^{error}) argued recently to planners regarding protecting Green Belt - please can you consider his views.
ONS have recently produced new figures on the population - please consider these.
(~~And finally~~^{error}) please can you reconsider the public inspection.
Continue on a separate sheet if necessary...

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

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

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

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Signature [REDACTED] Date 1/11/2014



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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MRS | |
| Name | GLADYS WEBSTER | |
| 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 GLADYS WEBSTER

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

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.

The proposed modification is not sound because alternative sites have recently been identified at Hutton/Whinton former fire stations therefore such haste is no longer necessary to remove the Edenhurst Avenue Green Open Space Sportsfield Site from its greenbelt status. There is no demand for a change of use other than by the owner and developer. Given time more and more 'brown field' sites will become available reducing the need for the loss of virgin greenbelt. Slow and cautious progress is therefore necessary in long term strategic planning especially in our depressed region of shrinking population.

Continue on a separate sheet if necessary...

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

I object to the modification to take this site out of green belt because it has not been proven that there will be a future housing demand. It has further not be proven that a change of use will be positive for the local community/area. Why has not the site been positively developed in greenbelt terms; as council and community re-affirmed its greenbelt status in the 2006 UDP consultation.

I am not important but the views of MR Eric Pickles the Local Government Secretary for Communities, along with our Chief Executive Officer for Knowsley Council Mrs Sheena Ramsey are and should be respected over greenbelt issues in both their recent pronouncements,

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 *but I am physically unable being over 90 years old*

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Signature



Date 20 / 10 / 2014



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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|--------------------------|-----------------|
| Title | Mr | |
| Name | Graham Moorcroft | |
| 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

M093, M134

Policy Ref

core

Paragraph Ref

para5.5

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 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.

NOT Sound

The modification M093 para5.5, M134 etc – to remove Land South of Edenhurst Avenue from longer term development needs is not sound. This change is not properly justified and not backed up by facts. I have requested information from the LA on a number of challenges to their policy and after considering the LA's response believe the choices made in the Plan are not backed up by facts nor provide the most appropriate strategy when considered against reasonable alternatives.

NOT JUSTIFIED

No robust analysis in support of error margins – whilst the technical report notes “data is extremely useful, it is not possible to translate trends directly to an appropriate annual housing target without taking into account some additional factors and acknowledging the methodological constraints associated with population methodological constraints associated with population and household projections” nowhere in the report is there full and proper consideration of methodology constraints or inherent error bands and margins in the assumptions and targets made in the report.

The permanent removal of a Green Belt area at Edenhurst will support the development proposal of only 74 dwellings. This figure represents less than 1% of the estimated requirement of 8100 new dwellings by 2028. Note that this requirement has reduced from 10 000 to 8100 on recent evaluations. On this trend it is entirely plausible that the requirement could reduce again before 2028. The policy to release green belt land ‘early’ to support the ‘current estimated’ figure is flawed. The technical report provides a range of models and plans however does not adequately justify error band margins or constraints in these estimations. Note that a very small error band reduction (less than 1%) could hence lead to loss of this green belt. My assertion is that early removal of small green belt areas (Edenhurst) is not justified until a proper justification of error margins within the models and assumptions has been provided in the technical report. These small green belt areas should not be released until other capacity is exhausted.

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 technical report for housing growth should properly address the constraints of the models, methodology, assumptions and error margins in the report. Small areas of green belt land that will supply only a small contribution to the dpa shortfall should not be released until all other areas are exhausted.. This is justified on the assertion that errors in the estimations and metholdoliegts have not been properly considered in the technical report and small error margins will have a far greater impact on these sites.

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

G Moorcroft

Date 13 Nov 14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

RETURNING THIS FORM

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|--------------------------|-----------------|
| Title | Mr | |
| Name | Graham Moorcroft | |
| 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 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.

NOT Sound

The modification M093 para5.5, M134 etc – to remove Land South of Edenhurst Avenue from longer term development needs is not sound. This change is not properly justified and not backed up by facts, robust arguments and evidence. I have requested information from the LA on a number of questions (BLACK) to their policy and after considering the LA's response below (RED) consider the choices made in the Plan are not backed up by facts nor provide the most appropriate strategy when considered against reasonable alternatives (UNDERLINE).

NOT JUSTIFIED

7) Previous statements made to the UDP by the proposed developer has stated that the development of the site will bring very positive benefits to the local community including enhanced and new sports and recreation facilities. The modification to the plan proposes residential development only. Please clarify what benefits to the local community this development will bring and define how it is a sustainable urban extension? Note my assertion is this is a relatively small site, on flood zone 2,3 and is wholly Greenfield and was a former sports field. Because of its small size and proposed single use as for housing only, its development would add little to add to the sustainability of the wider area as it does not sustain any community or social facilities or new infrastructure for the wider area.

The Council is proposing to allocate the site as a Sustainable Urban Extension, noting that its developable area is restricted by flood zone designations. Therefore, it is possible that a significant portion of the site will not be suitable for residential buildings, and hence could be kept as accessible open space. The specifics of this would be set out in any planning application made by a prospective developer of the site.

The Council's proposals to allocate Sustainable Urban Extensions respond to the need to address Knowsley's development requirements up to 2028. The Council considers that through its evidence base, it has selected the locations for this which will be the most sustainable. This is supported by a [Sustainability Appraisal](#) (available in several parts).

There is no evidence that the planning application to made by a prospective developer of the site includes plans for the portion of the site not suitable for residential buildings that will bring benefits to the local community.

8) The site in question was bought by the owner for a market value in-line with its designated status of green belt. The price paid was hence significantly below any rate that would be expected for a site with market housing development potential. Government policy stated that "Windfall" housing development on Greenfield sites would not be permitted except in exceptional circumstances where the development forms an essential and supporting element of wider regeneration proposals that will bring significant social, environmental and/or economic regeneration benefits for the community as a whole. Please explain how the strategy adequately justifies this Government policy for this site?

The Council is proposing through its Core Strategy to change the allocation of the site at Edenhurst Avenue from Green Belt to a Sustainable Urban Extension suitable for residential development. The Council believes that it has demonstrated the "exceptional circumstances" required for this change to be made. Therefore, if the Core Strategy is adopted, the subsequent development of the site would not be considered to be "windfall development" as the site would have already been identified in the adopted Plan as being suitable for new housing.

The LA's argument against the matter of windfall is not robust and is simplistic. So, the facts are that the land was bought at the time as green belt, just because LA decides to change its designation/allocation after this purchase date does not negate this fact nor that it is still windfall. Only if the purchase was after the change of designation (i.e. plan adoption) would the LA argument be sound.

9) Only in 2005 Knowsley MBC objected to 'Stonston Ltd' application for development of the site on the grounds given below, which for the main part are still valid today and will be into the foreseeable future (2028). Please explain how the MBC has reversed its position on each of these objections?

a. Knowsley MBC - This area of land (SW of Edenhurst) is designated greenbelt & the proposed use for housing development does not meet the criteria of the UDP (2005).

b. The site is surrounded on three sides by existing development. Development would increase urban sprawl & merging of areas which is against National Planning Policy Framework.

c. Knowsley MBC has previously stated that No substantiation exists for claims The development of the site will bring very positive benefits to the local community including enhanced and new sports and recreation facilities for which there is demonstrable support?

d. Knowsley MBC has previously stated said that the development will place strain on the local school and roads. (noting that The bowring park estate is a no through road access and any planning permission for new site entrance is likely to be on the Knowsley side to attract maximum benefit to the developer).

The designation of the Edenhurst Avenue site is currently Green Belt. The Council is now proposing, through the Core Strategy, to allocate the site as a Sustainable Urban Extension. Only once this allocation has changed would the site lose its Green Belt status. Therefore, the Council's position in 2005 was set out when the site was designated as Green Belt, and hence inappropriate for development.

The Council believes that it has justified its approach for the allocation of Sustainable Urban Extensions within its evidence base, including the [Knowsley and Sefton Green Belt Study](#), [Green Belt Technical Report](#) and [Technical Report: Sustainable Urban Extensions](#). This includes demonstrating the "exceptional circumstances" necessary in accordance with national planning policy. The plan-led process is considered the most appropriate way for development on Green Belt land to come forward.

The Council has considered the impact of the development on local infrastructure, and considers that that there are no strategic matters which would prevent the development of the Sustainable Urban Extensions coming forward. Infrastructure matters, including highways access and education provision, will need to be dealt with at the planning application stage, in accordance with Policy CS27 'Planning and Paying for New Infrastructure' within the [Core Strategy Proposed Modifications Version](#).

Again, the LA's argument against this matter is not robust and is simplistic. The LA response does not address any of the individual points here. The LA argument is that the land was not appropriate for development in 2005 because of these points (when it was green belt) but it is okay now if the land is no longer designated green belt. However the points b) c) and d) are unchanged since 2005 and are NOT related to the lands green belt status and hence not affected by change of designation. The LA's argument is therefore not valid or robust on the grounds of change of allocation alone.

11) And finally the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Could you please confirm and identify where the strategy / plan adequately accounts for national planning policy framework for Protecting Green Belt Land section 9, para 79 through 92? (<http://planningguidance.planningportal.gov.uk>).

The Council has considered this issue in detail, and has justified its approach to Green Belt review and release against the requirements of national planning policy. The Council believes that there are "exceptional circumstances" to justify the release of Green Belt land to meet housing and employment needs. This justification is set out within the [Knowsley and Sefton Green Belt Study](#) and [Green Belt Technical Report](#).

The LA has not provided detailed response with evidence against each of the section 9 Green Belt Land para's 79 through 92 in their response.

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 LA should demonstrate robust and sound arguments against the points raised above.

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

G Moorcroft

Date 13 Nov 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 | ANDREWS | 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

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.

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

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

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Signature 

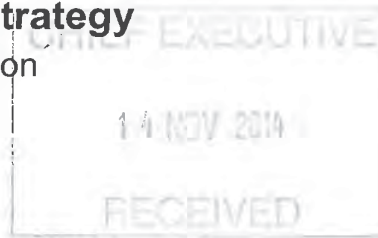
Date 13 - November 2014



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 | 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 | | |
| 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?

Modification Ref

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Paragraph Ref

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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.

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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.

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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.

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

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Signature

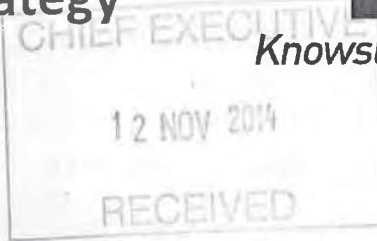
[Redacted Signature]

Date... 11th 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 | |
| Name | HELEN D DOWD | |
| 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

Helen O'Dowd

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

Modification Ref

KGBS14

Policy Ref

~~E2~~

Paragraph Ref

E2

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

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

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

^{South}
in Whiston

My objection to this plan is that 8 out of 10 wildflowers could disappear without insect pollination which is of national importance when Knowsley is home to the national wildflower centre, land less than 3 miles away from the greenbelt land in Whiston that is being considered for early release. Also this has an impact on the bee population - and to future - food - production.

Continue on a separate sheet if necessary...

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

MP. ERIC PICKLES RECENTLY ^{planners} made
COMMENTS REGARDING ^{how} PROTECTING THE
GREEN BELT - PLEASE LISTEN TO
HIS VIEWS.

ONS - RECENTLY PRODUCED NEW
FIGURES ON POPULATION - PLEASE TAKE
THESE INTO ACCOUNT

PLEASE, PLEASE RECONVEY THE PUBLIC
INSPECTION!

Continue on a separate sheet if necessary...

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

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

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

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

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

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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>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 | | |

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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 of lots 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...13th.....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 satisfactory 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 Councils 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

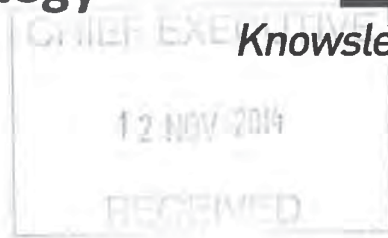


Date/4 November 2014



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

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



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|--|-----------------|
| Title | Mrs | |
| Name | Mrs Irene Davls MRS IRENE DAVLS | |
| 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

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

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

SEE COMMENTS IN RED.

Continue on a separate sheet if necessary...

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

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

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature



Date

25/10/14

KNOWSLEY LOCAL PLAN: CORE STRATEGY

Submission and Objections regarding proposed modifications

P R Davis
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

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

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

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

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

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

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

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

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

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

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

Proposed Modifications to the Submission Local Plan

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

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

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

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

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

“Councils must protect our precious green belt land”

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

KGBS 14 - South of Whiston

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

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

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

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

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

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

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

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

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

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

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

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

CS5 - Green Belt

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

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

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

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

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

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

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

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

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

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

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

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

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

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

CS14: Principal Regeneration Area – Prescott Town Centre

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

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

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

Not proved

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

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

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

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

CS21: Green spaces and Trees

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

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

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

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

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

CS22: Sustainable and Low Carbon Development

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

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

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

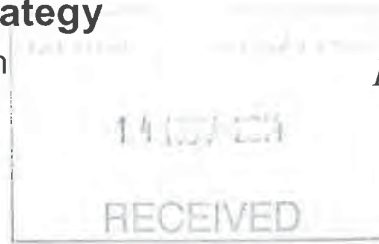
Once again this point is totally at odds with other statements and shows that there would be a negative effect on the objectives that relates to poverty and deprivation; and health.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

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
- > 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 | 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 | | |

**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

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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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Signature..



Date... 11.11.14 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

CHIEF EXECUTIVE

Knowsley Council

14 NOV 2014

RECEIVED

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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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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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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 Cope AND WOULD OVERFLOW.

Continue on a separate sheet if necessary...

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Signature.



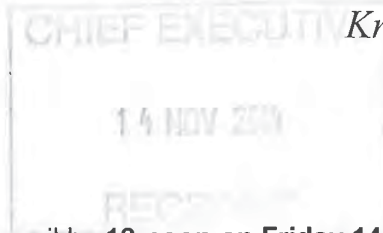
Date...11...11...November 2014

please complete will collect Wed/ Eve



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
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Knowsley Council

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| | 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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SUE1 AppE

Paragraph Ref

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KNOWSLEY VILLAGE IS VER PRETTY
DONT SPOL IT

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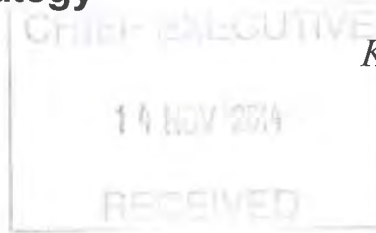
Date.....¹².....November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
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| | 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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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...

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Signature



Date... 13th November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

CHIEF EXECUTIVE

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

PART A - PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|-------------------------------|--|----------------------|
| Title | 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 | | |

**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.

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

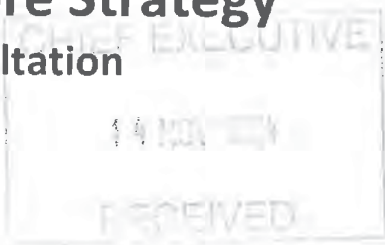


Knowsley Council

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 E1
~~12~~

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

- | | Yes | No |
|---|--------------------------|---|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> ← maybe but NOT sound |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

E1. unsound because - - - -

It is impossible to see how so many homes being built on our greenbelt will be helpful and in anyway positive for the environment and quality of life for the people of 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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5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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Signature



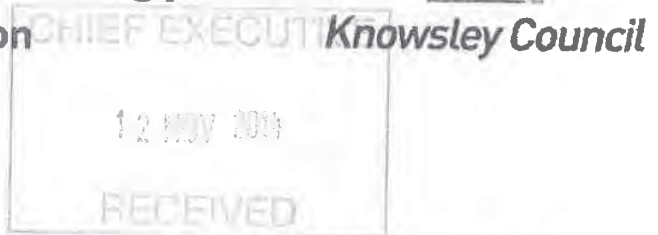
Date

1.11.14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



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

PART A – PERSONAL DETAILS

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation JANET CREHAN

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

Modification Ref KGB 14 Policy Ref KGB 14 Paragraph Ref KGB 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

I wish to object to this scheme because this will ruin the environment, the peace & quiet. It will swallow up Old Whiston village - closing shops, ruining the historical area. What is the matter with releasing Brown Belt areas? We returned to this area for a quiet life after working 45 years in the Health Service, this was our dream now its a nightmare !!!

Continue on a separate sheet if necessary...

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

The Road system will be overloaded and will cause ~~more~~ tailbacks and frustration.

This Area is a poor area - re: health, both respiratory and cardiac. ~~More~~ More housing and getting rid of the Green Belt area will be detrimental to us all

Continue on a separate sheet if necessary...

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



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PART A – PERSONAL DETAILS

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

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PART B – YOUR REPRESENTATIONS

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Name and/or Organisation

Janet Gore

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

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

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

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

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

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

Continue on a separate sheet if necessary...

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

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

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

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

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

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Signature



Date

1/11/14

POLICY CS3 TARGET 064 ID:298

From: Janet Marriott [REDACTED]
Sent: 29 October 2014 16:25
To: [REDACTED]
Subject: Fw:

Follow Up Flag: Follow up
Flag Status: Flagged

Sent from Windows Mail

From: [REDACTED]
Sent: Wednesday, 29 October 2014 12:52
To: [REDACTED]

Dear sir /madam, just a few comments regarding the plan to remove green belt status around Knowsley village. The plan would in effect double the size of the village changing it for ever. whilst I appreciate the need for housing having 2 young adults myself I feel the extent of the plan is unacceptable. Accessing knowsley lane is at peak times difficult and dangerous and Sugar lane during school hours is an accident waiting to happen. Getting out of Longborough road is a nightmare during school hours and would be difficult for emergency vehicles to access . The schools would need to expand making the problem worse. Bus services are at certain hours very poor and buses busy at peak hours. Whilst the service from the local GP surgery is excellent getting an appointment particularly in winter is difficult often having to wait several days. Services within the immediate area are poor. The green belt area is an important wildlife habitat which will be lost forever. There are also still areas of brown belt which have not been redeveloped. Whilst I appreciate there is evidence to support the development of green belt status land there needs to be the retention of some areas that are not for development, the extent of the proposed development is where my objection lies. The only local beneficiary from the proposed development, which doubles the size of the village is Lord Derby,

yours faithfully Janet Marriott [REDACTED]

Sent from Windows Mail



Knowsley Council

Knowsley Local Plan: Core Strategy

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12 NOV 2014

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PART A – PERSONAL DETAILS

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

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

JANET ROURKE

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

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

Continue on a separate sheet if necessary...

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

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

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

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

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Signature



Date

1st Nov. 2014



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CHIEF EXECUTIVE

Knowsley Council

14 NOV 2014

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

PART A - PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|-------------------------------|--|----------------------|
| Title | Mrs | Solicitor |
| Name | MARQUELINE 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 | | |

**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. *WHICH BUILDING PROGRESS & CHANGES WILL*

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. ✓

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

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|--------------------------------|-----------------|
| Title | MR | |
| Name | JASON BROWN | |
| Job Title (if appropriate) | | |
| Organisation (if appropriate) | Whiston Greenbelt Action Group | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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 UP TO DATE HOUSING REQUIREMENT TAKING INTO ACCOUNT LATEST FIGURES FROM ONS
TAKE INTO ACCOUNT STATEMENT FROM ERIC PICKLES MP REGARDING THE RELEASE OF GREENBELT. THESE ARE NOT EXCEPTIONAL CIRCUMSTANCES.

Continue on a separate sheet if necessary...

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

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

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

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Signature



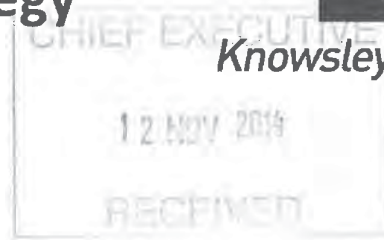
Date

29/10/14



Knowsley Local Plan: Core Strategy

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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MRS | |
| Name | JEAN | |
| Job Title (if appropriate) | HCA | |
| Organisation (if appropriate) | NHS | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation JEAN PHILLIPS Local Resident

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

Modification Ref KC GBS
14 Policy Ref E2A Paragraph Ref E2

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

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

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

My objection to this plan + worry is the local character and natural landscape of South Whiston stems from the early 12th century however the southern part of the country stays greenbelt. There are ample brown field sites which can be used. We have two schools which already have ample pupils in attendance and this will cause these schools to burst at the seams more investment and support needs to be ringfenced for agricultural development and education to enable resilient and sustainable communities enabling the community to grow our own fresh food. I also feel traffic will double thus putting the old, the children and the venerable people in South Whiston at risk.

Continue on a separate sheet if necessary...

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

M.P. ERIC Pickles. Recently made comments to Planners regarding the Protection of Greenbelt. Please can you listen to his views OWS have recently produced new figures on population can you please take these into consideration and reconvene the public inspection.

Continue on a separate sheet if necessary...

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

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

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

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

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Signature



Date



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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MRS | |
| Name | RUSH | |
| 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

MRS JEAN RUSK

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

Modification Ref

K9 B514

Policy Ref

Paragraph Ref

E3

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

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

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

THERE IS A distinct possibility that the M62 could flood if such a long area of the green belt is covered in concrete. Also the proposed development at Croxtone (which is lower in certain areas) and would not be able to take any surplus rainfall. Climate change is already causing heavy flooding especially in winter. At present the 110 hectares of Whiston green belt act as a soak for surrounding areas. The increased rainfall will seriously challenge the main drains. The previous resource need to meet + maintain Big Water lake with a proposed 1500 houses will surely impact on the quality of the water. Continue on a separate sheet if necessary...

the need of wildlife must be foremost in this area.

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: I want to listen to his views regarding protection of green belt

ONS:

ONS hand recently produced new population figures please take account of these -

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



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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MS | |
| Name | JEANNETTE HANKIN | |
| Job Title (if appropriate) | AUX | |
| 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

HG8514

Policy Ref

E1

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.

THOSE AREAS WHICH ARE NOT TO BE INCLUDED IN THE RELEASE FROM GREENBELT-OLD WOOD AND BIG WATER - WOULD BE SEVERELY IMPACTED BY THE INFLUX OF RESIDENTS BY THE INFLUX OF RESIDENTS TO THE PROPOSED DEVELOPMENT THESE FEATURES WOULD BE ISOLATED AMIDST THE PROPOSED DEVELOPMENT AND WOULD BE RENDERED 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

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 A UP TO DATE HOUSING.
REQUIREMENT TAKING INTO ACCOUNT
LATEST FIGURES FROM ONS
TAKE INTO ACCOUNT STATEMENT FROM
ERIC PICKLES MP REGARDING THE
RELEASE OF GREENBELT THESE NOT
EXCEPTIONAL CIRCUMSTANCES

Continue on a separate sheet if necessary...

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

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

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

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Signature



Date 1 / 11 / 14



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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|----------------------|-----------------|
| Title | MS. | |
| Name | JENNIFER LE POIDEVIN | |
| Job Title (if appropriate) | CLINIC HYGIENIST. | |
| Organisation (if appropriate) | N.H.S. | |
| 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

JENNY HE POIDEVIN

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

Modification Ref

SURZA

Policy Ref

KGBS14

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.

When I purchased my property on the park it was for the open aspect and to enjoy the wildlife and privacy the park gives me. Green Belt should be the last resort. Extensive Inland Flooding in 2007 focused attention on the economic and human costs of Flooding (PM 2008) climate change is already causing heavier down pours especially in winter a trend that is project to persist and increase flood risk (defra 2009) at present he 110 hectares of green belt in Whiston acts as a safe for surrounding areas. The main drains (ADSI, map MMD-321747-D-SK-00-XX-000) to handle such down pours. There is a distinct possibility that the MBZ 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 surplus rainfall.

Continue on a separate sheet if necessary...

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

Carry out an up to date housing requirement survey taking into account the latest figures from the office of National Statistics.
Carry out a relevant Traffic Management survey taking into account the existing 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

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



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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 | [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.

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

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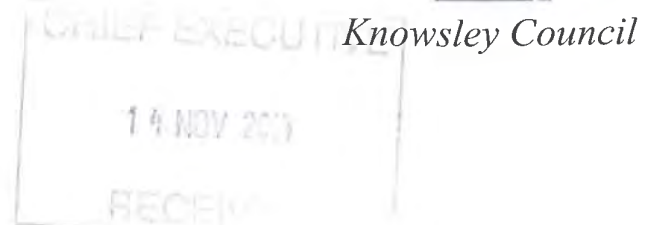
Signature

Date...11th.....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@knowslev.gov.uk
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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A - PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|-------------------------------|--|----------------------|
| Title | MRS | 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 | | |

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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

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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.

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...

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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.....¹¹.....November 2014

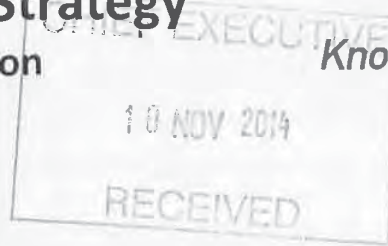


Knowsley Local Plan: Core Strategy

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 | MISS | |
| Name | JOANNE SANDERSON | |
| Job Title (if appropriate) | LEGAL SECRETARY | |
| 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 JOANNE SAUNDERSON

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

Modification Ref Policy Ref KGBS14 Paragraph Ref EC 2

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 this will change the character immensely ^{of Whiston}
- local services such as GP's etc will be overloaded.
- It will have a massive impact on noise and disturbance through ^{more} traffic.
- Farm jobs will be lost for local people.
- Land should be planned and developed as a whole and planning permission applied for, for the whole area, not just each section.

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.

Erik Pickles issued 16.10.14 instructions to Planners, please take notice.
Take into account the latest population figures from the ONS. We do not require to use Greenbelt as sufficient Braunfield within Knowsley.
Reconvene to public information.

Continue on a separate sheet if necessary...

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Signature



Date

1.11.14

POLICY CS3 TARGET 075 ID:323

Please find below the reasons for my objections to modifications to the Core Strategy M078, M168 and M272, policy refs CS5, SUE1, SUE2, specifically relating to the proposition to release from greenbelt the land in Prescot adjacent to the A58 and containing Whitakers/Beesley & Fildes.

1. In my view the modifications are unsound for the following reasons:

The background to the NPPF states the role of sustainable development 'as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Achieving sustainable development: (social role) by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being [...] proposed development that conflicts should be refused unless other material considerations indicate otherwise.'
(s12)

The release of the greenbelt area directly impacts upon the ability of future generations in terms of reduction in green space. Already my six-year-old cannot understand the correlation between what he is being taught about in school concerning the environment and the imminent decision to build on the only green area he sees between his home and his school field, over a mile away. I cannot see in the relevant proposals a move towards improvement in health, social or cultural well-being; on the contrary, building on local greenbelt is damaging to all three elements.

2. The NPPF states that:

- 'local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

– any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

– specific policies in this Framework indicate development should be restricted [...] **For example, those policies relating to [...] designated as Green Belt.**

For decision-taking this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted [...] **For example, those policies relating to [...] designated as Green Belt.'**

Therefore the plan to remove the greenbelt status is unsound as it does not restrict development in such areas.

3. The NPPF states:

'Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework; (s17)

encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value (s17)'

Therefore the plan is in conflict with the NPPF in respect of the above points. There is already, I understand, interest (negotiations?) in relation to the Whitakers site – whereas the brownfield land on Delph Lane remains yet to be developed, having remained empty for some years. A garage in Huyton with planning permission for flats remains unsold, yet developers are already preferring the greenbelt sites for obvious commercial reasons. These commercial preferences are surely not the 'exceptional circumstances' under which greenbelt land might be developed.

4. The NPPF, S109 states:

'The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'

The Knowsley Local Plan is in conflict with these commitments, simply by proposing to build on greenbelt sites.

5. In addition, s110 adds:

‘In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.’ Please see the point above in relation to Delph Lane and Huyton above, sites that are ready and waiting for development.

It is notable that several houses at Quiston Grange are yet to be sold, despite an advertising sign being placed at the bungalow on the corner of Delph Lane and Scotchbarn Lane. The developers stated when erecting the sign that it would not be in place for long – and yet months later the remaining five houses or so are yet to be sold. If houses in this popular area, close to Eccleston Park and good schools, cannot be sold easily, how can it be established that building 8,100 houses (significantly more than the council’s 1,965 estimated number to equate to net population loss/gain) is going to draw in a large influx of population – some of whom it is presumed will want to live adjacent to the busy A58 and M57 motorways?

6. The NPPF section 114 states:

Local planning authorities should:

set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.’

Proposing to build on greenbelt sites is in conflict with this paragraph.

7. The government’s view of greenbelt is:

‘The fundamental aim of Green Belt policy is to **prevent urban sprawl** by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

s.80: Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The land adjacent to the A58 unarguably checks the unrestricted sprawl of urban areas. Without it, Prescott's urban sites will spread to meet the busy A58 and M57 highways. These highways form albeit artificial boundaries to this part of Prescott, before it becomes Knowsley Village. The current green area is the only one, other than Eaton Street park, between the nearby M57 roundabout and the other side of Prescott in several directions.

The very reasons that this piece of land was designated greenbelt in the early 1980s remain valid – in fact more so given the increase in traffic and infrastructure since its designation.

8. The government also states in relation to greenbelt:

'Once established, Green Belt boundaries should only be altered in exceptional circumstances.' I'm afraid, having read as many documents in relation to the modifications that time allows, I cannot ascertain what these exceptional circumstances are. It seems that the modifications are an exercise in changing wording in the CS in order to get around certain provisions of the NPPF – an exercise in changing form rather than substance.

9. I refer now to the recent comments by Nick Boles, as reported:

'Boles wrote that he was "disturbed" by the inspector's [notably, the same inspector allocated to Knowsley] language, which he said "invited misinterpretation of government policy". The National Planning Policy Framework (NPPF) states that a green belt boundary may be altered only in "exceptional circumstances", Boles said. It "must always be transparently clear" in inspectors' reports, he added, that if councils go down this path it is their choice to do so. The secretary of state would consider intervening in local plans, he added, if it seemed as if an inspector had forced green belt release.

One of the modifications that inspector Martin Pike had proposed was that the Tory-controlled authority should "recognise that some loss of green belt to housing development will be necessary."

Boles wrote that he was "disturbed" by the inspector's language, which he said "invited misinterpretation of government policy". The National Planning Policy Framework (NPPF) states that a green belt boundary may be altered only in "exceptional circumstances", Boles said. It "must always be transparently clear" in inspectors' reports, he added, that if councils go down this path it is their choice to do so. The secretary of state would consider intervening in local plans, he added, if it seemed as if an inspector had forced green belt release.'

The wording of PM09, 42, Policy CS3, Clause 1 by the inspector that release of greenbelt land **'is required to meet the need for new housing over the plan period'** and **'3. On current evidence, this requires some land to be brought forward from sites in the Green Belt earlier than anticipated in the Submission CS'** echoes language used earlier in relation to Reigate, language that Nick Boles was so 'disturbed' by.

In addition, at the public meeting of 24th October, as interpreted by the attendees, the council representatives confirmed that their hand had been forced by the inspector.

10. Without adequate time to look at every document, and so without being able to directly reference the exact relevant part of the CS, I would also like to point out that if 450 houses are to be built on the land adjacent to the A58, the impact on the local infrastructure will be enormous.

Traffic:

It is already very difficult to get out of Knowsley Park Lane at certain times of day. An influx of traffic – presumably one-way because of the dual carriageway – from a housing estate will make access out, and sometimes in, to the road virtually impossible at busy times.

Schools:

There are no schools in the immediate vicinity of this proposed site. Therefore where are the children of the houses expected to attend school? Or is it expected, according to the council's figures that only 2.29 people will live in each house, and not require a school place? All the nearest schools have been oversubscribed in at least one of the last three years. While the council wishes to attract people to live in these newly built areas, it is an obvious fact that families or families-to-be are attracted to an area because of its schools. Any families on an estate at Whitakers would have some trouble getting their children into good local schools, as they would simply live too far away.

Noise:

The noise of the motorway and A58 is significant when outside in this area. Any houses on the Whitakers site would have this background noise permanently, originating only a short distance from the house.

11. I cannot see, in this proposal:

- a) what the exceptional circumstances are
- b) any proposals that remediate the 'harm' done by release of hard-fought-for greenbelt land

In addition, the expectation that 8,100 houses will be required in the borough – and in particular Prescot, with its declining centre and council insistence on making its residents and visitors pay for parking, hence sending them elsewhere – is so far beyond the 1,965 net gain/loss of population that it seems to be incredibly ambitious.

If the council has great plans for the area to attract these new residents, other than building new estates on ex-greenbelt sites, they are not clear to me. The council also seems to assume that if commercial sites are developed, people will want to live near them. I do doubt this, given the lack of, and continually declining, amenities in Whiston and Prescot.

Finally, I see no reason why the Secretary of State's policy position that 'unmet need, whether for traveller sites or for conventional housing, is unlikely to outweigh harm to the green belt and other harm to constitute the "very special circumstances" justifying inappropriate development in the green belt' should be deviated from in this area. The inspector seems to state that unmet need is indeed the only reason to release the greenbelt in his statement: '12. **To meet the immediate housing land supply problem it appears that at least some reserve locations will have to be redefined as specific site allocations in advance of preparation of the SADP.**'

There is no housing crisis here and I believe the modifications to the Plan are not sound. To quote: '**A local planning authority should regard the construction of new buildings as inappropriate in Green Belt [...] inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances [...]** It [NPPF] also makes clear that the construction of new buildings should be regarded as "inappropriate" for the green belt.'

What I would add, is that clearly part of the A58 land is already developed as the Whitakers garden centre. In a spirit of compromise, if the land is to be built upon for residential properties, surely the extent of development could be limited to the currently developed area, presuming that the owners of the garden centre are intending to sell to a developer.

To finish: the government white paper The Natural Choice: Securing the Value of Nature 2011 states:

We want to improve the quality of our natural environment across England, moving to a net gain in the value of nature. We aim to arrest the decline in habitats and species and the degradation of landscapes. We will protect priority habitats and safeguard vulnerable non-renewable resources for future generations. We will support natural systems to function more effectively in town, in the country and at sea. We will achieve this through joined-up action at local and national level to create an ecological network which is resilient to changing pressures.

Yours sincerely,

Johanna Robinson

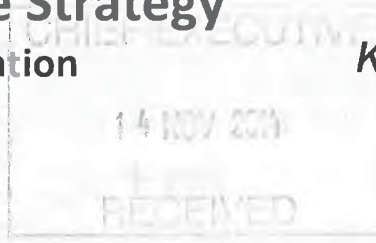


Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

Knowsley Council



RETURNING THIS FORM

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

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

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|--------------------------------|-----------------|
| Title | DR | |
| Name | JOHN HINDLEY | |
| Job Title (if appropriate) | HEAD OF ENVIRONMENTAL STRATEGY | |
| Organisation (if appropriate) | MANCHESTER MET. UNIVERSITY | |
| 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

JOHN HINDLEY

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

Modification Ref

Policy Ref

KC0514

Paragraph Ref

ES

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 from the green belt for the following reasons.

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

Continue on a separate sheet if necessary...

fragmentation of vital habitat networks. inadequate dispersal of species will cause a local and regional extinction of nationally significant and endangered species (Harrison & Bruns 99)

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

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

ONS have recently produced new population figures - please take account of these.

Please reconvene the public inspection.

Continue on a separate sheet if necessary...

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

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

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

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

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

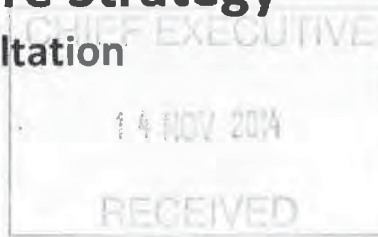
1.11.14



Knowsley Council

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 | JOHN WOOD | |
| 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.

No protection enhancement and management of protected and endangered species or habitat as why there is no sound reason for taking the last remaining greenbelt land out of South Whiston for Development. Ever leaving Big Water and Old Wood would not stop the decline of ^{of these} most species. Knowsley Council must look at Brown Field sites and not previous greenbelt, which will be needed for future generations.

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

11th. 11th. 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

EXECUTIVE
12 NOV 2014
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Knowsley Council

RETURNING THIS FORM

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MR | |
| Name | JOSEPH TODD | |
| 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 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.

WE DO NOT WANT ANYMORE GREEN BELT LAND TAKEN FOR BUILDING PROJECTS. SOME OF THIS LAND IS OF ARCHAEOLOGICAL INTEREST. THE COUNCILS AND PLANERS IN THE COUNTRY SHOULD BE PUTTING MORE PRESSURE ON THE GOVERNMENT TO REDUCE THE NUMBER OF PEOPLE ENTERING THE COUNTRY, EVENTUALLY THIS WILL ONLY INCREASE THE DEMAND FOR MORE BUILDING 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.

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



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | Mrs | |
| Name | Joyce Tyrer | |
| 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

Joyce. A. Turner (Mrs)

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

Modification Ref

Whiston
South

Policy Ref

KG BS14

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 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.

E1

Release of the Green Belt South Whiston will contradict the purpose of green belt, 'to retain attractive landscapes, and enhance landscapes, near to where people live..

This greenbelt within south Whiston is the last in Whiston although there are various areas, such as Old Wood + Big Water to be "untouched" by the proposed. The knock on environmental rubbish caused by air pollution etc will have a devastating effect on the area. The higher the quality of the green space the more likely it is to be used. To build 1500 houses on 'Best + Most Versatile Grade 2 Agricultural land, will not, in my opinion, enhance green 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.

Re-look at the many 'brown' options which are sitting there doing nothing.

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 November 2014



20th October 2014

Objection to "Release of Land from the Green Belt" (Local Plan)

Dear Sir/Madam,

Further to your mailing dated 19th 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 19th 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.



19th 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 14th 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 19th 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

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14 NOV 2014
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Knowsley Council

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

PART A - PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|-------------------------------|--|----------------------|
| Title | 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 | | |

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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.

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

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...

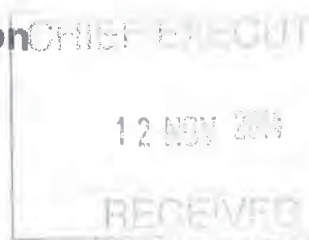


Date... 12th November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

RETURNING THIS FORM

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

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

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

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MRS | |
| Name | KAREN TOMLINSON | |
| 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

KAREN TOMLINSON

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

Modification Ref

Policy Ref

KGBS14

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 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.

This is the last area of greenbelt land in Whiston. Once it has been built on the residents will no longer have access to the natural environment and therefore I am objecting to this modification and propose Option 3.

Continue on a separate sheet if necessary...

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

Before you make your decision I urge you to reconsider the use of green belt land until every brown field site in Knowsley has been used. I do not believe that Knowsley Council can deliver this plan. Knowsley has a declining population and statistics evidence this. Due to the economic situation as one of the most deprived areas in the country I wonder who would want to move into these new diverse homes costing in excess of £200,000 each when unemployment is high and salaries are low.

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 | 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 ^{WARRINGTON} ~~HERE SINCE~~ 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 HUNDREDS OF FAMILYS. I KNOW THIS AS I WAS ONLY 15 YEARS OF AGE WHEN WE MOVED. ~~HERE SINCE~~

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

Keith Kennedy



14th 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 CO₂ (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 CO₂ 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.

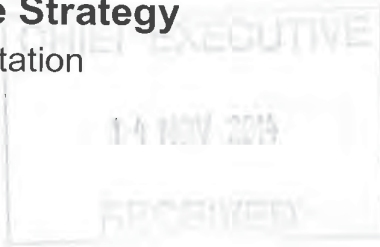
Regards Keith Kennedy



Knowsley Council

Knowsley Local Plan: Core Strategy

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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
- > 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) ^{CS?} | <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 TO 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 SAVE 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,
1st Floor Annex, Municipal Buildings,
Archway Road, Liverpool, M36 9YU.

Dated: Thursday 13th 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:

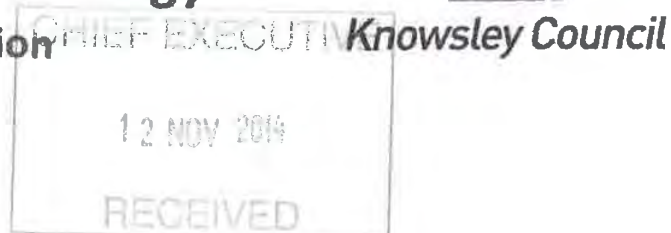
- a) listen to the residents they represent, and
- b) remove all references to the site at Knowsley Village [KGBS 6] from the local plan, and instead
- c) work to improve release of Brown Belt land for redevelopment, and
- d) recognise that Liverpool City Council can deliver a greater number of houses, offsetting the need to forfeit valuable Green Belt land in Knowsley.

Yours Sincerely,



Knowsley 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 | Keith Swan | |
| Job Title (if appropriate) | Psychotherapist | |
| 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

KG B514

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.

I object to this modification because I believe that the early release of greenbelt will have a detrimental impact on the local area. Whiston has always retained a community and rural village feel and I have lived in Whiston since 1990. The release of greenbelt in S. Whiston will contradict the purpose of greenbelt 'to retain attractive landscapes & enhance landscapes near to where people live'. There are a number of associated documents to support this including Natural England, DEFRA etc. Green belt and particularly S. Whiston greenbelt provides a diverse choice of habitat for invertebrates including the Knowsley honey bee. Ancient woodlands, wet woodlands and agricultural land have all been identified in the habitat survey produced. I have a number of concerns regarding how the loss of greenbelt will impact on bee & invertebrates population and conservation - highlighted in the attached appendices.

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.

Mr Inspector, before making your decision I appeal to you to take careful consideration into the following.

- i) EMC Pickles recent announcement on Oct 16th 2014 relative to the release of greenbelt land - advice for Local Authorities.
- ii) I ask you to ensure all brownfield land is developed and a robust monitoring system is established clearly demonstrating that the need for housing is relative to Proposed population increase predictions included in Local Plan.
- iii) I have concerns over Knowsley Metropolitan Borough Councils ability to successfully deliver the Local Plan - please see attached appendices regarding KMBC's ability to deliver services in Knowsley.

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

KMBC Note - Representation Form did not include attachment of Appendices referred to



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 | |
| Name | Keith Wooding | |
| Job Title (if appropriate) | | |
| Organisation (if appropriate) | | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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

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PART B 1- YOUR REPRESENTATIONS

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

Name and/or Organisation

Keith Wooding

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

Modification Ref

M055 to
M065

Policy Ref

CS1, to CS5,
SUE

Paragraph Ref

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

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

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

Generally, the Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

It is disappointing that these proposals to build on Greenbelt at South Whiston have only just come to light despite claims that due consultation process has been followed. Public meetings with the Inspector should be re-convened to take into account the views of local residents in accordance with the provision of the Government in the Localism Bill.

It can be seen that the Knowsley Local Plan does not take into account the latest data from the Office of National Statistics (ONS) in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014. Furthermore, the plan, its strategy and objectives contain many conflicting and ambiguous statements, with little in the way of tangible deliverables. Often making reference to flawed and outdated supporting documentation.

Delivery of Strategic Objectives is not considered to be SMART, outputs are not 'measurable' and therefore cannot be seen as being 'achievable'. This in turn would cast doubt on the 'realistic' criteria.

On a personal note if I had submitted proposals for work, of this standard with this many grey areas, undefined & unquantified benefits with little substantive basis, I'd be shot.

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

Continue on a separate sheet if necessary...

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

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

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

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Signature 

Date 11/11/14

PART B2 – YOUR REPRESENTATIONS

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

Name and/or Organisation

Keith Wooding

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

Modification Ref

M055 to
M065

Policy Ref

CS1, to CSS,
SUE

Paragraph Ref

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

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

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

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP (updated October 2014) the Secretary of State for Communities, which states "Planners must protect our Green Belt" and "This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development". See link below:

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

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. It is clear that no exceptional circumstances exist in Whiston.

The North West does not have the Housing shortage that London and the South east has, and as such removal of Greenbelt should not be considered in this case.

This objection to the release of green belt has also been raised as Knowsley council have not proven that all practical alternatives & Brown Field sites have been explored, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley plan fails to give high enough priority and consideration to the empty housing stock within the borough. Knowsley have a very poor record of bringing empty and derelict housing back into use. No reference can be found to any consultation with local housing trusts. Knowsley have not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

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

Green Belt is also supposed to stop urban sprawl, Knowsley already touches Liverpool at Huyton and the proposals at South Whiston will bring urbanisation up to the boundary with St Helens. Likewise the proposal at Cronton will bring Knowsley closer to Halton. This is NOT consistent with National Policy.

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

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

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

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

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Signature



Date

11/11/14

PART B3 – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

In relation to KGBS14 South of Whiston. This policy is contrary to Strategic Objective 8, CS5, CS8 & CS21. Either the principles set out in SO8 are adhered to, or the land is used for development.
As stated in CS5 and CS8, it cannot meet both opposing policies. In fact C21 8.21-8.26 reduce to the point of being ineffective the relevance of CS3 and the requirement to release Green Belt land for development at all.

Given that there are prime areas of land around Prescot & Huyton that previously have been earmarked for housing yet lie undeveloped for a number of years indicates that Knowsley model for predicting the number of houses that will need to be built and the land required is flawed.

If the model was correct those areas would have been redeveloped. This proves that there is no justification to release Green Belt land except for Knowsley council financial benefit.

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

Continue on a separate sheet if necessary...

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

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

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

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Signature



Date

11/11/14

PART B 4– YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

With regard to the area south of M62. The proposed September modifications took the emphasis off investment in existing locations and placed it firmly on the 'new'. This indicates that Knowsley have little or no appetite to fill the empty space in Huyton Business park and empty units on nearby Fallows Way.

A ten minute drive round Huyton Business Park will show how much unused land or empty unit/buildings are available. The occupancy level is one area where there are inaccuracies in the supporting documentation.

The area south of M62 doesn't need more employment locations, it just needs the existing areas to realise their full potential. Proper effective management would achieve this whilst allowing other Core Objectives to be met.

Clearly the site has potential, as recently a developer acquired a large site for redevelopment.

For Fallows way, it is believed that two of the three units are un occupied at present. If the remaining occupant could be encouraged to relocate to Huyton Business Park, the whole of Fallows Way could be given over to housing. Reducing further the need to use Green Belt land. This would have the added benefit of reducing the number of large lorries that use Windy Harbour Road daily and hence congestion.

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

Continue on a separate sheet if necessary...

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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)

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

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

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Signature



Date

11 / 11 / 14

PART B5 – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

With regard to KGBS14 South Whiston, there is very little mention of provision for new local centre, expansion or regeneration of existing local shops

As for 6.45, the policy is flawed and mostly irrelevant. This highlights lack of understanding of local issues. In turn this suggests that Knowsley have taken a 'one-solution-fits-all' approach. This element of the core strategy cannot be met.

Little mention is made of requirement for additional facilities such as health care or clinic, GP surgeries and dentist. Nursery and school requirements are also not described.

No reference was found to alternative policy documents that would detail these requirements, which suggests that no additional pre-school or school facilities are planned to meet huge increase in demand for services from such a large housing development. Similarly no additional health care provision. A number of strategic objectives will not be met

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

Continue on a separate sheet if necessary...

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

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

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

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

Signature



Date

12/11/14

PART B6 – YOUR REPRESENTATIONS

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

Name and/or Organisation

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 Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council

RETURNING THIS FORM

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

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

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

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|---------------------|-----------------|
| Title | Miss | |
| Name | Kirsty Leigh Easton | |
| Job Title (if appropriate) | Teacher | |
| Organisation (if appropriate) | | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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

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

PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

As a teacher I have a stressful job. I use the greenbelt land regularly to relax and plan my lessons in the tranquility of the countryside. I don't find this tranquility in the park land and don't see why I cannot continue to use the greenbelt land which was set aside for the benefit of the community on the outskirts of major cities. I have just bought a house in Knowsley and found a large choice of properties available. There is no need to use greenbelt land.

Continue on a separate sheet if necessary...

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

Inspector to say NO AS Plan is Not Sound.

This Plan was not positively prepared as it was against the wishes of the community and not enough time was allocated for objection.

This Plan is not justified as the Knowsley Population has decreased and the demand for housing has fallen. There are a lot of new developments in the area that are empty including the business parks so we don't need new ones, use the ones already built.

The Plan will not be effective within the community who would benefit more from the greenbelt land.

The plan is not consistent with national policy which states that Greenbelt land should be preserved. We have a right to our greenbelt land. Continue on a separate sheet if necessary...

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

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

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

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

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

Signature



Date

3/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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

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

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | 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

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| <p>E1 To protect, enhance and manage the local character and accessibility of the landscape and countryside across Knowsley</p> | <p>Although some of the locations that would be released from the Green Belt contain areas that have been previously developed and other policies in the plan will seek to protect landscape character, each of the options could support the release of areas of greenfield land and have a negative impact on landscape character. As such, each of the options has the potential to have a negative impact on the objective. However, Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being ‘called in’ by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term. It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward</p> |
|---|--|

Objections:

- The purposes of Green Belts in planning policy are clear – to protect the countryside from urban sprawl and to retain the character of towns and cities (Natural England, 2010). The proposal to release the Green Belt in South Whiston will exacerbate urban sprawl and its identity and character as a village community will be lost.
- As this is the last area of Green Belt within the South Whiston area the residents will no longer have access to the natural environment and all the benefits that the natural landscape exhibits.
- Those areas which are not to be included in the release from Green Belt – Old Wood and Big Water – would be severely impacted by the influx of residents to the proposed development. These features would be isolated amidst the proposed development and would be rendered unsustainable as a quality natural landscape and habitat for wildlife.
- Release of the Green Belt in South Whiston will contradict the purpose of Green Belt ‘to retain attractive landscapes, and enhance landscapes, near to where people live’.
- The local character and natural landscape of South Whiston stem from the early 12th century (Merseyside Historic characterization Project, 2011). The loss of this natural landscape held within the very last of the Green Belt in South Whiston would see the complete eradication of all the historic character that currently remains. The heritage of South Whiston would thus be lost for all current and future residents.
- Whiston is a ‘village’ with a village community. The proposed development would eradicate this village community as numbers would be too great for the community to be considered a village any longer.

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| 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> |
|---|--|

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.

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| <p>E3. To adapt to climate change including flood risk.</p> | <p>The Strategic Flood Risk Assessment identifies that a small part of the southern section of the site is at risk of fluvial flooding. This risk of flooding will be exacerbated by climate change and this part of the site should only be considered for development as part of a sequential approach. It is recognised that the identified capacity of the site has been derived from the assumption that the portion of the site within Flood Zones 2 and 3 will be excluded from the developable area and unless this is the case, and the other identified mitigation measures are implemented, the proposals could have a negative impact on the objective and its sub-objective of reducing flood risk.</p> <p>The Preliminary Flood Risk Assessment indicates that the site also falls within an area that is susceptible to ground water flooding. Nevertheless, the PFRA does recognise that there is a lack of local information in relation to groundwater flooding and that the dataset used only identifies wider areas that may be at risk from groundwater flooding. Accordingly, the information on groundwater flooding is caveated by the acknowledgement that only isolated locations within the overall susceptible area are likely to suffer the consequences of groundwater flooding. Nonetheless, the proposals would result in a significant area of greenfield land being replaced with built development which may have an adverse impact on levels of surface water run-off if suitable measures are not implemented, such as sustainable drainage systems.</p> <p>The proposals would also result in the loss of a greenfield site that has the potential to provide habitat for species and help mitigate higher summer Temps associated with climate change.</p> |
|---|---|

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.

| | |
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| <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> |
|--|--|

Objections:

- It is quite clear that the development of Green Belt in Whiston will have an overall negative effect on the aim to mitigate climate Change. The Sustainable and Low Carbon Development (5.183 SD32. CS22) removal of the developers need to meet the Sustainable homes/BREEAM standards will increase energy usage.
- The increase in Traffic in the area will increase carbon emissions and have a detrimental effect on Air Quality.
- The Industrial Estate mentioned on Windy Arbor Road has little effect on employment as the few factories that are occupied, have no need for more workers.
- There is also an acceptance that this development will not be suitable for energy generated by renewable sources. In addition, the removal of the requirement to achieve a certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.
- “The need to build more sustainable housing with a limited supply of land means that innovation is necessary but working towards sustainable communities relies on more than the achievement of zero carbon housing; its success will also be determined by the selection of appropriate locations for development”, Neil Williamson FLI, President Landscape Institute

| | |
|---|---|
| <p>E5. To provide, conserve, maintain and enhance green infrastructure.</p> | <p>Although Options 1 and 2 would support the retention/provision of some areas of public open space, each of the options would result in the loss of substantial area of greenfield land which offers the potential to function as part of the Borough’s Green Infrastructure network and it is considered that each of the options would have a negative impact on this objective due to the area of greenfield land that would be lost. It is however acknowledged that there is only a low level of certainty over this impact of Options 1 and 2 on the objective due to their potential to retain areas of public open space & increase the quality of the accessible green infrastructure network. By contrast, there is a higher degree of certainty that Option 3 would have a negative impact on this objective as it would not offer the same level of protection to areas of Public Open Space.</p> |
|---|---|

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.

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| <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> |
|--|--|

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.

| | |
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| <p>E8. To protect, and where necessary, improve local air quality.</p> | <p>The proposals are likely to result in an increase in traffic in the immediate surrounding area but it is recognised that the extent to which this will impact on air quality is uncertain and the site is not within an Air Quality Management Area. It is noted that there are a range of local facilities and amenities that are readily accessible from sections of the site including primary schools, a GP and health centre & a local shopping centre on Greene’s Road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opp side of Windy Arbor & Huyton Bus Park which may reduce the need to travel for work. Nevertheless, these community facilities are some distance from the eastern and southern sections of the site and only the northern sections of the site are within 800m of Whiston railway st & not all of the site is in close proximity to the existing bus routes on Windy Arbor & Lickers Lane. The proposer of the site has also stated that the proposals would include on-site facilities, the provision of new bus routes through the site and that the development would be designed to encourage walking and cycling. Both Options 1 &2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, due to the number of trips that a development of this scale would be likely to generate, it is considered that each of the options has the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of on site facilities.</p> |
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Objections:

- It is highly unlikely that a development of over 1500 houses would improve air quality especially if you take into account the level of traffic increase. The suggestion that walking to Greenes Road is an option for a non car owning elderly or young person in winter is a non-starter. Bus services are poor in Whiston at best and non-existent after 8pm at the southern end of Windy Arbor Road.
- “Our farmland and countryside can produce high-quality food and support wildlife when trees play a part in the landscape. We all breathe easier when there are beautiful woods in which to

relax and unwind. And yet the UK needs more trees. We are one of the least wooded countries in Europe and trees and woods continue to disappear from our landscapes”. *Woodland Trust*

- There is a need to reduce the need to travel by car and increase the use of more sustainable forms of transport. Economic activity rates and incomes are lower in Knowsley than the NorthWest average.
- There is a need to retain a greater proportion of retail expenditure within Knowsley to enhance the vitality and viability of the Borough’s town centres.
- 2 of the 15 conservation areas in Knowsley are included on the latest Heritage at Risk register;
- Access to areas of natural and semi-natural open space is poor in parts of the Borough;
- There is a need to conserve and enhance the natural environment recognising the importance of biodiversity.
- There is a need to secure and promote increased energy efficiency and renewable energy sources;
- There is a need to promote and secure more sustainable waste management.
- There is a need to consider the impacts of flooding and flood risk;
- The re-use of land should be promoted to minimise the take-up of greenfield land.

Source: Sustainability issues were derived from the baseline data gathered in 2008 – 2009 to inform the SA SD07 Scoping Report, Knowsley council

None of the Knowsley MB goals, above, will be achieved by releasing Green Belt.

“Air pollution is currently estimated to reduce the life expectancy of every person in the UK by an average of 7-8 months. The measures outlined in the strategy could help to reduce the impact on average life expectancy to five months by 2020, and provide a significant step forward in protecting our environment.” DEFRA The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

| | |
|--|--|
| <p>E9. To use water and mineral resources prudently and efficiently.</p> | <p>Each of the options is unlikely to have any significant effects on the objective.</p> |
|--|--|

Objections:

The objections would be largely in line with those made against E7 as follows:

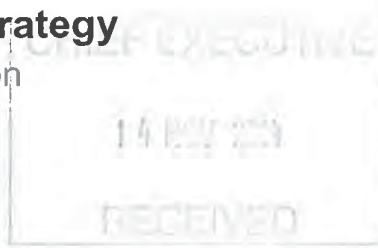
- It is critical that this precious resource is managed properly to ensure that the needs of society, the economy and wildlife can be met and maintained in the long-term.
- Surrounding Big Water Lake with a vast housing estate of over 1500 houses must surely impact on the quality of water in the local area.
- The lake in this area is used for recreation and fished regularly by a local club, it is considered “Good Fishing” one of its advantages is its rural location. We have seen no mitigation of negative effects on water, suggested by Knowsley Council.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
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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 | | 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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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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Signature.. [REDACTED]

Date.....12th.....November 2014



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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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- | | Yes | No |
|--|--------------------------|-------------------------------------|
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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



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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

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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... 11th November 2014



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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 | | |
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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.

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.

*Leave Knowsley village
as it is*

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*.....November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE
Knowsley Council

12 NOV 2014

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RETURNING THIS FORM

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MR | |
| Name | LEONARD TRAN | |
| 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 LEONARD TRAN

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

Modification Ref MOSS - MOSS Policy Ref 50220
EST - 85
SUE AD51
SD 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) | <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.

MY FIRST OBJECTION IS THE DAMAGE CAUSED TO THE ENVIRONMENT. NOT ONLY WILL THIS CAUSE THE LOSS OF HABITAT, BUT THE LOSS OF LIFE. THERE ARE SPECIES THAT WOULD BE CONSIDERED COMMON PLACE, YET THEY PLAY IMPORTANT PARTS IN THE FOOD CHAIN AND FOR THE HEALTH OF OUR GREEN SPACES. I FEEL THAT IT IS IMPORTANT TO PROTECT THE WILDLIFE AND COUNTRY SIDE FOR OUR FUTURE GENERATIONS, CHILDREN SHOULD NOT HAVE TO GROW UP IN A CONCRETE JUNGLE. MY SECOND OBJECTION IS THAT IT JUST DOES NOT MAKE SENSE. THERE ARE SIMPLY NOT ENOUGH PEOPLE WANTING TO OR BEING FINANCIALLY ABLE TO PURCHASE NEW HOMES. THE REGENERATION OF EXISTING SITES IS A

Continue on a separate sheet if necessary...

FAR MORE SENSIBLE OPTION.

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 REGENERATION OF EXISTING LAND AND PROPERTIES IS THE MORE SOUND OPTION. IT WOULD SEEM AS IF AREAS HAVE BEEN DEEMED BEYOND HOPE. AS IF CERTAIN AREAS ARE TO BE LEFT TO EXPIRE. I DON'T FEEL TOWNS COULD TAKE AN INFUX OF MASS POPULATION. WORKING WITH EXISTING HOMES AND FAMILIES IS THE ONLY OPTION TO KEEP WHISTON A HEALTHY FUNCTIONING TOWN. DESTROYING OUR SURROUNDING COUNTRYSIDE IS DESTROYING THE TOWNS FUTURE. MORE CONSIDERATION NEEDS TO CONSIDERED. BOTH FOR THE FUTURE POPULATION AND THE ENVIRONMENT.

Continue on a separate sheet if necessary...

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

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

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

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Signature 

Date 1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

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Knowsley Council

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MRS | |
| Name | LINDA O'CONNOR | |
| Job Title (if appropriate) | SELF EMPLOYED | |
| 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 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.

I think it would seriously damage the character of Whiston and will overload the infrastructure. It is now impossible to cross Windy Arbor Road at Peak times.
The present noise and air pollution is unacceptable.
There is presently very little parking space in the Whiston area.
The loss of arable land, loss of jobs for local farmers, will cause a lasting effect.
Bee keepers are essential in any community for the pollination of food plants. If there no fields there's no plants or Bees.
We will need new schools Dr's surgery.

14/11/14
14/11/14

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 MP on 16 OCT 2014. Carry out up to date transport survey. Take into account latest population figures from O.N.S. 2014.
Re confine public inspection.

Continue on a separate sheet if necessary...

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

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

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

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Signature



Date

12/11/2014



Knowsley Local Plan: Core Strategy

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PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MISS. | |
| Name | LYNN WARRICK | |
| 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

LYNN WARBRICK

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

Modification Ref

Policy Ref

KGBS14

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 strongly object because the local green belt which by definition has been protected should continue to be. There is nothing to support the use of this land, when it has been stated that the population in Winston/Wansley is decreasing. If any extra housing is needed it should be weighed up versus the existing brown sites (ie is this enough) without using green belt. We should be building properties for people who do not live in Winston. At the meeting it was stated that ~~the~~ some of the housing was for people of the district & unless this is for work etc it is not needed!! Building on this green belt land will help our citizens health, road access, access to NHS etc. ~~we~~ this area is already over-loaded with traffic.

Continue on a separate sheet if necessary...

Building work units is unnecessary when many units remain unused in the area & surrounding areas. Schools will not cope with extra population.

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

THE GOVERNMENT ARE QUOTES AS SAYING ONLY WHEN ABSOLUTELY ESSENTIAL SHOULD GREENBELT LAND BE USED TO BUILD SOCIAL HOUSING. THEREFORE THE BROWNBELT LAND NOT BROWNED BY THE LOCAL COUNCIL SHOULD BE ACCEPTED AS ENOUGH, ESPECIALLY IF ALL AREAS OF BROWNBELT LAND IN WALSLEY ARE UTILISED & USED.

IT IS NOT NECESSARY TO USE ANY GREENBELT LAND IN WALSLEY WHEN THE POPULATION IS REDUCING.

THIS SHOULD NOT BE ABOUT MONETARY INCENTIVES IE NOT BUILDING ENOUGH SUSTAINABLE HOME JUST TO MEET GOVERNMENT TARGETS!!!

Continue on a separate sheet if necessary...

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

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

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

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

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Signature

Date

1/11/14



Knowsley Council

Knowsley Local Plan: Core Strategy

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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.

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.

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...

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

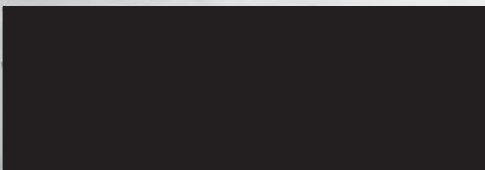
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a) No, I do not want to participate at any further public hearing

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

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Signature



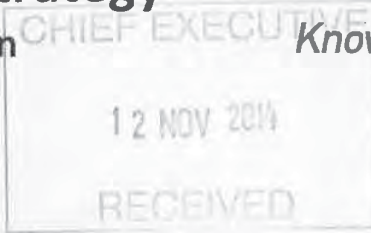
Date: 12th November 2014



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

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation SAVE WHISTON GREEN BELT

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

Modification Ref Policy Ref KGBS14 Paragraph Ref EC1

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

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

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

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

Continue on a separate sheet if necessary...

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

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

Continue on a separate sheet if necessary...

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

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

1/11/2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

CHIEF EXECUTIVE *Knowsley Council*

14 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@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 | 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 | | |

**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 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)

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

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Signature. 

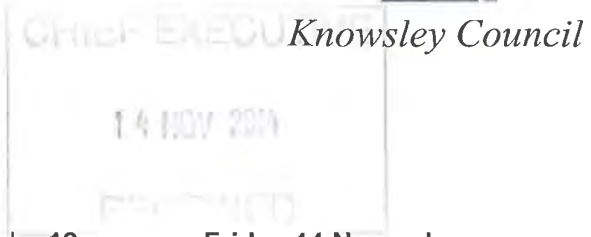
Date 10.11. November 2014

Please Complete/Will Collect Wed/ Eve



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
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PART A - PERSONAL DETAILS

| | 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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Policy Ref

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

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

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Signature.. 

Date... 11th November 2014



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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"/> |

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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. *THIS MASSIVE BUILDING MASS, (A CHANGE) WILL RUIN THIS*

KNOWSLEY VILLAGE, & DEPRY EARTH THE LAND OWNER
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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Signature...



Date. 11.11.14 November 2014



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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 | | |
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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...

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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.. [REDACTED]

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@knowsley.gov.uk
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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MRS | |
| Name | MARGARET JERABEK | |
| 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 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 AM CONCERNED THAT THERE WILL BE MUCH INCREASED TRAFFIC IN OUR LOCAL AREA.
THE INFRASTRUCTURE IS NOT IN PLACE TO ALLOW FOR IMPROVEMENTS TO SUSTAINABLE TRANSPORT.

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 YOU TO TAKE INTO ACCOUNT GUIDANCE FROM ERIC PICKLES MP . ON OCTOBER 16, 2014 .

PLEASE ALSO TAKE INTO ACCOUNT ONS POPULATION FIGURES FOR 2014 .

I ASK YOU TO RE-CONVENE PUBLIC INSPECTION TO CARRY OUT AN UP TO DATE TRANSPORT SURVEY .

Continue on a separate sheet if necessary...

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

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

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

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

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Signature



Date

1 NOVEMBER



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 | | |

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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



14/10/14

Dear Sir

I am writing in concern for the building of houses on the land behind my house on Baileys Lane.

My husband and I bought this house in 1989, our first house, we have brought up 4 children and have had the advantage of seeing lots of Wild Life over the years. They have also watched the Farmer out in his tractor and were able to bring their friends to watch out of the bedroom window.

There are not many families in this area to be lucky enough to do this.

When we bought our house the road was very quiet but now the road is that busy, you have put double yellow lines outside our house, this means anyone visiting us now has to park on Leathers Lane. Over the road to us are council houses, they are able to park up to 6 cars up their drive. I feel that if and when these houses are built, our road is going to be even busier and we are going to struggle getting out of our drives even more than we do now.

Baileys lane is no longer a lane but a very busy road. The village will no longer be a village. The quiet life that we thought we were moving into will be no longer quiet.

Why is it that because we have a private house we are being put at a disadvantage, due to parking and now you are looking to take away our beautiful view. I feel that if you lived where we live, you would put up a fight to stop this going ahead.

I also thought that the land at the back of us was a floodplain. Why do you need to build houses on Greenbelt land I am sure you could find other places to build? A couple of years ago I spoke to two men from the Council by the Halewood Library and they assured me that the council would look at other areas to build on. When looking at the plans I feel that you have not looked anywhere else.

I can't believe that we need that many houses in this area.

Countryside should be kept as countryside.

Regards

Maria Town



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

RECEIVED

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MRS. | |
| Name | MARLE ORMOND | |
| Job Title (if appropriate) | Housewife | |
| Organisation (if appropriate) | | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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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.

I think it will damage the Whiston Community - we will not have enough schools doctors etc also as we don't have a great deal of green belt our children would be deprived now + in the future Also the amount of traffic is far too much now + the amount is more than enough to put up with.

Continue on a separate sheet if necessary...

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

There is no reason to build on
Greenbelt there are enough
Brownfield + empty properties
in Knowlsey Area.
Take into account guidance from
Eric Pickles on 16th Oct 2014 -
carry out up to date transport survey
Take into account population figures
from O.N.S. 2014.
Reconsider Public Inspection.

Continue on a separate sheet if necessary...

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

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]

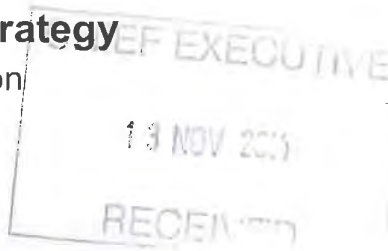
Date 1-11-14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

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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 | | |

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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.

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

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Signature.. 

Date 10th November 2014



Knowsley Plan: Strategy

Local Core



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 | Martin Parker | |
| Job Title (if appropriate) | | |
| Organisation (if appropriate) | | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation Martin Parker

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

Modification Ref M157 Policy Ref SUE2c Paragraph Ref 6.45

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 proposal involving SUE 2c is unsound as it underestimates the impact of increased traffic flow on the roads around Whiston and the M57/M62 Junction 6 /A5080/ A5300 intersection known as “Tarbock Island”. This complex roundabout has had a history of traffic congestion and accidents.

The existing roads have traffic queues at daily peak times now.

The Knowsley Local Plan Transport feasibility study and Infrastructure and development options study recognised the current congestion and local queueing on Windy Arbor Road and Lickers Lane and the future impact of the proposals to “generate a large number of trips, with the majority most likely being dispersed towards Tarbock Island and Windy Arbor Road”.

The Sustainability assessment . In addition to meeting the generic guidance in Policy SUE 2c states “proposals for residential and/or employment development at South Whiston and Land South of the M62 should deliver (in no order of priority):

- a. Safe and convenient highways access for the sites together with a well connected internal road system and traffic mitigation measures, including any measures needed to address the impact of the development on traffic generation in the wider area;
- b. Provision for public transport, walking and cycling, which enhance linkages within the area and surrounding areas including linkages to the former mineral railway line linking Cronton Colliery and Stadt Moers Park and to Whiston railway station;

The proposal is unsound in that in the Sustainability assessment S2 assumes the provision of “Safe and convenient highways access for the sites together withtraffic mitigation measures”.

The existing population of Whiston South Ward is 7379 in 3157 households – the proposal to build 1900 additional houses for “aspirational” families will lead to an almost doubling of the population in the area and the existing roads will be overwhelmed. “Aspirational families” elsewhere in the borough tend to be 2 car owning (18% of households) and there are issues around schools with cars delivering children where parents then drive to work. In Knowsley 37% of households have no access to car (2011 Census) this influx of 1900 additional households is unsustainable in the local area. The traffic congestion will preclude incoming residents and existing from relying on future “enhanced” public transport.

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.

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 throughout.

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

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

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

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Signature



Date 12/11/2014

Knowsley Plan: Strategy

Local
Core

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 | Martin Parker | |
| Job Title (if appropriate) | | |
| Organisation (if appropriate) | | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation Martin Parker

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

Modification Ref M056A Policy Ref CS3 Paragraph Ref 5.18

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 proposal to bring forward to “within 5 years” is unsound as it is incorrectly justified. The proposal releases much more land from the Green Belt than is required to meet housing demand and falsely justifies the requirement to bring forward SUEs for early release in the first 5 years.

Examples of this incorrect justification include the evidence used for housing demand in which both the population and forecast population growth are overstated. The 2013 Core Strategy states (in Section 2.10) population to rise by 4000 between 2011 and 2021. The Technical Report “Planning for Housing Growth in Knowsley” forecast a rise of 3000 in the same period. However the document SD 31 (June 2014) forecasts an even lower rise of 1800 over a longer period from 2012 to 2037. MO 24 evidences that the baseline population assumption was incorrect and overstated by 3330.

The premise for the growth in housing demand was therefore unsound and overstated.

Additionally housing demand did not allow for the fact that in the past 3 years a constant level of vacant homes is immediately available averaging 2221 (2169 at 31/10/2014, 2204 at 31/10/2013 and 2289 at 31/10/2012) which should be factored into short term availability.

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.

Delete the amendment and the proposed changes to 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) Yes, I wish to participate at any further public hearing

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Signature



Date 12/11/2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MISS | |
| Name | MAUREEN INMAN | |
| 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

MAUREEN INMAN

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

Modification Ref

Policy Ref

K66514

Paragraph Ref

E L 2

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.

There is nothing to be gained by removing the green belt, a building on this land, please retain it for the people in the area, there is a public footpath to the woods & lake & people go for a walk across the field to the lake.

Continue on a separate sheet if necessary...

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

Eric Pickles issued 16-10-14 instructions to planners please take notice.

Take into account the latest population figures from the ONS, we do not require to use green belt as sufficient Brown field within Knowsley

Reconvene to public 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

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Signature

Date

1-11-2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MR | |
| Name | MARILYN BROWN | |
| Job Title (if appropriate) | RETIRED | |
| 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 MARIE BROWN

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

Modification Ref Policy Ref KG5514 Paragraph Ref E8

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

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

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

MOTOR TRAFFIC INCREASES REDUCING THE QUALITY OF AIR QUALITY AND ALSO A REDUCTION IN THE QUALITY OF LIFE IN SURROUNDING AREA PUBLIC TRANSPORT IS NON-EXISTANT IN EVENING AROUND WINOY ABBOT ROAD.

THERE WILL ALSO BE SIGNIFICANT IMPACT ON ALL LOCAL SERVICES E.G. HEALTH SERVICES THROUGH INCREASED TRAFFIC. THERE ARE NO DEFINATE PLANS TO INCREASE PUBLIC TRANSPORT. HEALTH SERVICES ETC.

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 MP. HAS RECENTLY ADVISED PLANNERS TO TAKE MORE CARE OF OUR GREEN BELT. LISTEN TO HIM.

TAKE ACCOUNT OF RECENT O.N.S. FIGURES ON POPULATION

RE CONSIDER PUBLIC INSPECTION

Continue on a separate sheet if necessary...

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

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

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

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

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Signature



Date

01.11.2014

Supplementary Planning Documents (SPD) & Local Development Orders (LDO)

Consultation - Response Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Tuesday 21 October 2014. Forms received after this time can not be accepted.**

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

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PLEASE COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------------|-----------------|
| Title | Mr | |
| Name | Michael Gittens | |
| Job Title (if appropriate) | | |
| Organisation (if appropriate) | Whitakers Garden Centre | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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ART 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?

ASS Triangle Prescot

2. To which part of the SPD or LDO are these comment intended to relate?

Page

M16A.

Paragraph / Figure
chapter

6A.

3. Please provide comments below.

As an employee of Whitakers Garden Centre for the last 25yrs and having spent most of my youth around prescot Nursery I am fully aware of this piece of lands potential and its amenity value.

I feel that to remove this area of land out of Green Belt and allow housing is short sighted and will be to the detriment of Prescot and the wider community of Knowsley and beyond.

Two other garden centres within four miles have recently closed and been sold for building. Land locked with no room for expansion. Dobbies at Halewood is expected to become a Tesco.

This gives the Whitakers Garden Centre the opportunity (with the right owners) to create a top class centre improving the amenity of the area creating walks, arboretum, play area. An area for leisurely recreation bringing more jobs and visitors to Knowsley, while set in the Green Belt Back drop. The area is also rich in wildlife also making a good wildlife site.

Continue on a separate sheet if necessary...

Continued

Signature



Date 14th November 2014.

Prescot Brook which crosses the western corner, is one of the cleanest stretches of water in Merseyside containing Millers Thumb fish and caddis fly.

This area is part of a visual, recreational landscape providing a barrier against urban sprawl setting apart Prescot's distinctive character. Also providing a wildlife corridor along Prescot Brook to Knowsley Park and Nethley Brook, to the river Mersey.

Dye House in the western corner is a home for rehabilitating abused children, giving peace and tranquility in a semi-rural environment.

Redevelopment and regeneration of housing stock should be set as the priority. As the population is still 24000 less than in the 1980's.

The Population growth projection is way above the probable real outcome.

 12th November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council

CHIEF EXECUTIVE
14 NOV 2014
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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | Mr | |
| Name | Mike Gittens | |
| 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

Mike Gittens.

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

Modification Ref

M005

Policy Ref

1.9

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.

False trigger of Projected Growth.
All previous projections way above the actual.
Requires realistic figure for population growth.
Present population still approximately 24000 less than in 1980's.
Return to original document wording, ignoring the developers demands.

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 a more honest and realistic projection of population growth and mortality of the aging population.

Return to original document wording. Removing the developer priorities. Council standards should be maintained and enforced.

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

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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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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.

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

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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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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 | NEIL MINEY | |
| 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

~~South Army~~ NEIL MINEY

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

Modification Ref

Winston
South

Policy Ref

KGRS14

Paragraph Ref

E1 EC3
S2 S7

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

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

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

I wish to object to our greenbelt being used for overdevelopment and urban sprawl. We will lose much needed farmland and therefore rely on more foreign imports of food + livestock. There will be a detrimental effect on local wildlife, especially here, skylark and many other birds.

This is urban sprawl without any necessary infrastructure and I fear for the effects on local hospitals, GP's, schools roads and jobs. Where are the jobs for the extra 8,100 people?

I worry that we will not have access to our ancient woodland/countryside pathways.

Another village, Cronton, will be lost forever.

Continue on a separate sheet if necessary...

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

Continue on a separate sheet if necessary...

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

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

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

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Signature 

Date 1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form



Knowsley Council

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

PART A - PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|-------------------------------|--|----------------------|
| Title | Mrs | 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 | | |

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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 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 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



7 November 2014

Local Plan team
Knowsley Council
1st Floor Annexe
Municipal Bldg
Archway Road
Liverpool L36 9YU

Dear Sir

I wish to place on record my objection to the Green Belt land in Prescot being used for housing.

I have heard the argument that the Government is forcing this on local councils but this has now been disputed. The Home Counties are not going to take this lying down. They may need more housing in the prosperous south east but our housing market is in the doldrums and the population (according to statistics) is diminishing.

There are many derelict areas in Prescot which could be built on first. I am guilty of thinking something is going to be done about them and not asking the question but now I am.

- 1) What are the plans for Sewell Street (the closed car park and overgrown land adjacent fronting on to Kemble Street?)
- 2) What are the plans for Chapel Street/Warrington Road (derelict land left after a fire spread causing the shops and flats in this road to be demolished many years ago)?
- 3) What are the plans for Scotchbarn Lane – The boarded up areas which used to be the swimming baths and land through to Warrington Road and adjacent to this (on the other side of the railway) the land which housed the Pirelli Club. Also further down the old school playing field?
- 4) And what is happening to the old Esso Garage land on Warrington Road?

I am saddened to see such neglect of our town. Have you ever travelled to Prescot by train recently we have a lovely first impression (a burnt out public house!) Surely the council could do something about this eyesore?

I would welcome a response to my questions.

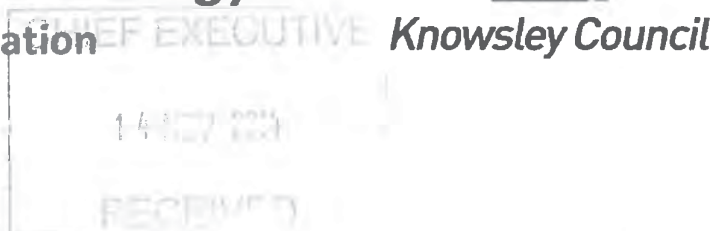
Yours faithfully





Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



RETURNING THIS FORM

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

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

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

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-----------------------------|-----------------|
| Title | Mr S | |
| Name | Patricia McDonald-Holmes | |
| Job Title (if appropriate) | Printmaker Artist / Teacher | |
| Organisation (if appropriate) | | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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

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

PATRICIA McDONALD HOMES

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

Modification Ref

KGBS14

Policy Ref

E4

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 quite clear that the development of Green Belt in Whiston will have an overall negative effect on the aim to mitigate climate change. The carbon footprint of each dwelling and the scale of development will produce large quantities of carbon monoxide and air pollution. The destruction of plant life and removal of trees will add to the effect of poor air quality. An estimate of 80 tonnes GHG is created for the construction of a brand-new cottage with two bedrooms upstairs and two reception rooms and a kitchen downstairs.

From the KGBS14 document, 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, meaning more GHG created from individual homes.

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, which means that builders need not put into place the high specifications needed in the development 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.

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.

With the decline in average household occupancy. More and more, people want to live alone or in small family units. In 2004, the average household occupancy was 2.34. By 2026 this is expected to reduce to 2.09 (DCLG, 2007). This issue does cause difficulties when attempting to reduce the carbon footprint of a household. A single person household does use more energy per person than a four person household. Therefore, instead of seeing a decline in energy use by households there is still a small annual increase in the region of 1% per year.

In addition to housing, there are numerous other issues that contribute to the carbon footprint of the average UK household. The construction, maintenance and household energy requirements equate to 25% of total GHG emissions in the UK. (John Barrett^{1,*}) and Thomas Wiedmann²)

Taking into account the paragraphs in E4 relating to mitigating climate change it is evident that Knowsley council itself believe it will not meet targets for the reduction of GHG if this development and destruction of greenbelt land goes ahead.

Continue on a separate sheet if necessary...

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

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

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

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

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Signature



Date

13/11/14



Knowsley Council

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 | Paul Marshall | |
| Job Title (if appropriate) | | |
| Organisation (if appropriate) | | |
| Postal Address | [REDACTED] | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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

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

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...

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 7th of November 2014

Further objections to the Local Plan include the following points:

WILDLIFE

The wildlife on the greenbelt site must be protected at all costs, but no guarantees have been made about this. At the public consultation in Whiston, a video of which can be found here: <https://www.youtube.com/watch?v=d3WuxRrS1ow&list=UUTaqTuHMu4mtYyoTYUCyMrQ>

██████████ of Knowsley Council stated that the council's own survey commissioned to assess the area found that there is significant ancient woodland and valuable wildlife within the greenbelt. He then went on to state that they would 'like' for developers to develop on the areas that have less value in this respect, but later in the same video Knowsley Council's representatives admitted that any details on where would be developed and where wouldn't would not be a decision for the council but for the developers.

In other words, there is no guarantee that the wildlife and woodland would be protected, and what is certain is that at least part of it (the supposedly 'less valuable' parts) would be lost.

POPULATION

Knowsley's population has been in decline for several decades and there is no solid evidence that this is going to change. Even population projections from Knowsley Council's own data (Sub National Population Projections Update 2014) offer contradicting guesses and predictions of growth far lower than that would necessitate the exceptional circumstances which would justify removing the land in question from greenbelt status. There are already significant numbers of empty properties all over the borough, as well as plenty of brownfield that remains undeveloped as well as business properties that remain vacant.

GREENBELT STATUS

The council attempts to assure us that the plan is only to remove the protected land out of greenbelt status, and that this doesn't necessarily mean it will be developed. It will be a lot more likely to be developed once it has lost greenbelt status protections afforded to it. The idea that taking the status away is in itself an innocuous act is incredibly disingenuous.

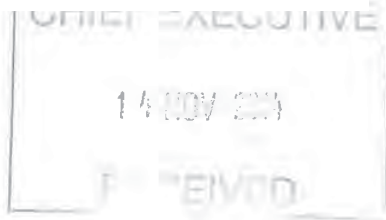
BROWNFIELD AND ECONOMIC VIABILITY

The Government Secretary of State Eric Pickles recently went on record to reiterate that councils must protect greenbelt at all costs and may only consider developing greenbelt land in extremely exceptional circumstances. Such circumstances have not been proven by the Local Plan, and not enough has been done to source alternative land for development. Economic Viability of brownfield land should not be a concern of the council, which does not own the greenbelt. Simply stating that developers would prefer the more lucrative economic prospect of greenbelt development over developing on brownfield does not fall into exceptional circumstances or a last resort justifying its release from. The council states government has forced its hand to develop greenbelt, and Government says don't develop on greenbelt. If even government and the council cannot agree on who is the driving force behind this plan, then how can the plan be considered legally compliant and sound?

In conclusion, I oppose the legal compliance and soundness of the local plan on the following grounds:

- No guarantees of protection to wildlife or heritage land from developer's future proposals.
- Seriously flawed consultation process which failed to involve the majority of the affected constituents within the consultation period.
- Insufficient evidence that the population of Knowsley will increase to the degree that necessitates the scale of development considered.
- Insufficient evidence that other sites were properly considered, or that the Government's instruction to protect greenbelt at all costs has been adhered to.

The law states that Greenbelt cannot be developed except as a last resort, and the circumstances which constitute this have not been proven by any stretch of the imagination. If the government is against greenbelt development, if the council was reluctant to use the greenbelt in its plan, and if the people themselves are against the development, how can it go ahead? Do developers now have the power to govern our country and our communities? Does economic viability trump both the law and the will of the people?



13 NOVEMBER 2014

LOCAL PLAN TEAM,
KNOWSLEY COUNCIL

Dear Sir/Madam, RE: REPRESENTATION TO LATEST PHASE
OF CONSULTATION, ON THE KNOWSLEY CORE
STRATEGY,

please find enclosed a copy of
my latest representations regarding the Knowsley
Core Strategy. Should you have any
queries about any of the content, then
please do not hesitate to contact me.

Yours faithfully



PAUL SLATER
REPRESENTATION NO: 005



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). These are mainly a result of the recent grantings of planning permissions, along with a present, recently submitted planning application for the Everton Football Academy, at Finch Farm, Finch Lane, Halewood, which will have implications for the proposal to move the Green Belt boundary in this area (site KGBS20 –Halewood – East (South)).

1.0 I remain of the view, especially in the light of the latest population forecasts released by the Office of National Statistics, in May, 2014 (which show a much lower rate of population growth for Knowsley than previous figures) that the target figure of 8100 new dwellings over the plan period is too high, and that density assumptions are too low. I presented my reasoning behind this in my written representations of December, 2012 and of July, 2014 (P.Slater – representor no:005), along with attendance at the public inquiry sittings in November, 2013 and July, 2014. In the July, 2014 representation, I made reference to the figures (and forecast population age structures) contained within the Sub National Population Projections Update (Document SD31).

1.1 I still hold the view that the amount of Green Belt land being proposed for release is excessive, and that some of the sites should be re-considered, and remain as Green Belt. Likewise, the land at Knowsley Village is not required to meet any housing need during the plan period, and should therefore remain within the Green Belt.

1.2 If Knowsley were to adopt a lower figure for new housing, this would greatly reduce the amount of Green Belt land needed for development. A lower figure would not translate as a decline for Knowsley, but would result in a lower, more sustainable, rate of growth.

1.3 The net housing completions for Knowsley have been dragged down by the large number of demolitions that have also occurred. Account should be taken of how long these properties were empty, prior to demolition. Additionally, discounting should be applied to the demolition numbers to take into account the high vacancy rates that occur across Knowsley¹.

1.4 Knowsley have adopted what appears to be a simplistic predict and provide approach. This will result in development being directed to more profitable Green Belt locations regardless of environmental or regeneration considerations. There should be a brownfield site first policy. A lot of previously developed sites have been assumed to have lower capacity than their actual potential, and this reduced capacity has been used to assess their supply potential. Subsequently, there is more pressure upon Green Belt sites.

¹ Knowsley Local Plan Monitoring Report (2012) states that there are 2020 empty homes in Knowsley (Section 3.65, page 30).

This representation is split into four parts:-

- (2) Discounts applied to sites within the SHLAA.
- (3) Assumed capacities of housing sites.
- (4) New sites, not identified in the Initial Housing Land Supply (November, 2013).
- (5) Proposed new boundary of Green Belt at site KGBS20 (East of Halewood (South)).

2. Discounts applied to sites within the SHLAA

2.1 In the Inspector's Preliminary Assessment of Land Availability (IPALA), issued 11 November 2013, a number of discounts were applied to sites listed in the SHLAA. I have a number of concerns at these discounts. As will be subsequently shown, some of the sites that were subject to discounting have since been given planning permission, for numbers of dwellings above the initial assumed capacity for these sites.

2.2 The figure for an annual provision of 450 dwellings per annum, arrived at by Knowsley Council already factors in past under-delivery against the target figures (for the pre-2010 period). This includes for the period of time, when the annual target had been set at 230 dwellings per annum. Additionally, a 20% buffer has been applied, for more recent under-delivery. Knowsley Council has also risk-assessed the sites within the SHLAA, factoring in their own discounting. This latter process has therefore under-estimated the actual capacity of previously developed, and other sites identified within the existing urban area.

2.3 Some of the sites to which discounts have been applied are largish sites, with potential for fairly high capacities. Applying discounts to the capacity of sites identified within the SHLAA further skews the balance, in favour of developing Green Belt sites, to the detriment of brownfield, previously developed sites.

2.4 All of the risk assessments and discounting add up to a large number of dwellings that have been deducted from the potential housing supply. The fact that these sites exist, and have potential, should be an important factor. Their existence (along with the large number of empty properties in Knowsley) would suggest that exceptional circumstances do not exist for the removal of land from the Green Belt, to provide housing land. Government policy could well change within coming years, to incentivise the development of brownfield land within the existing urban area. The National Planning Policy Framework (Section 17, page 6) encourages the effective re-use of previously developed land.

2.5 Below are some indications of sites, where planning permission has been recently given, at particular sites, for numbers of dwellings above the yield given in various Council documents, such as the SHLAA, and well above the supply assumed, after discounting had been applied.

2.6 Site KO440 (land at Larch Road, Huyton), is shown in the SHLAA as having a potential yield of 87 dwellings. This site is listed in the IPALA for a 20% discount. The Initial Housing Land Supply (IHLS) produced by Knowsley Council in November, 2013 also shows a 20% discount applied to this site. However, in September 2014, planning permission was granted for the erection of 127 net dwellings at this site. This represents a 46% increase

on the yield given in the SHLAA. The number of dwellings also works out at a figure of 81% higher than the discounted yield. Furthermore, this site was not listed in the 2011 SHLAA. This is an indication of how new housing sites, not previously identified can come forward.

2.7 At Pinnington Place, Huyton, planning approval has been granted for 20 flats, in two buildings (planning application 13/00782/OUT). This site is listed in the IHLS document, with a capacity of 6, to which a 20% discount has been applied.

2.8 Likewise, planning permission has been given for 14 dwellings at St. Georges Church Hall, St. Georges Road, Huyton (planning application: 14/00035/FUL). This site is listed in the IHLS with a capacity of 7, to which a 66% discount had been applied. Additionally, this site had been pushed back into the 6 – 10 year housing supply.

2.9 In connection with this, in the 2012 SHLAA, site KO339 (the Hilton Grace Community Centre, The Avenue, Halewood) is shown with a potential yield of 16 dwellings. This was updated to 21 units in the IHLS. However, a 20% discount was applied. In December 2013, planning permission was granted for 21 no. dwellings at this site (planning application: 13/00497/FUL).

2.10 There are a number of sites with large capacities for potential housing that have had discounts applied to them. This discounting multiplies up to a large number of dwellings (the land for which is present) which have been omitted from the potential land supply (putting further pressure upon the Green Belt). The discounting that has been applied is too severe, and now that there is an upturn in the housing market, and much more activity, it should be re-considered.

3. Assumed capacities of housing sites

3.1 In previous representation (July, 2014) I commented, that I believed the assumed average densities for identified sites, were too low. I note that Knowsley Council acknowledge that densities used in the SHLAA are conservative. This is highlighted in section 3.5.1 (page 40) of the Housing Position Statement (Examination library document SD22). It is also clearly shown in Table 3.13 (page 40) of this document, where a higher figure of average densities is given for sites with extant planning permission. This table (3.13) shows the SHLAA 0 to 5 year supply with an average density of 33.2 dwellings per hectare (31.2 dwellings per hectare for years 6 to 10). Extant planning permissions have an average site density of 37.5 dwellings per hectare.

3.2 This difference of 4.3 dwellings per hectare (difference of 6.3 dwellings for years 6 to 10) could multiply out at a large number of dwellings, when the numbers and sizes of all the various sites are taken into consideration.

3.3 Recently, planning permission was granted for the construction of 207 dwellings on the former golf driving range, Bank Lane, Tower Hill (13F/00393/FUL). This site has previously been identified as having potential dwelling capacity for 131 dwellings (Table 10.1, page 157 of the 'Planning for Housing Growth' – Technical Report). The approved planning permission gives an increase of 58% on the original assumed capacity of this site. This

shows the over-cautious approach of Knowsley in assessing the potential residential capacity of sites.

3.4 Although the above site is within the present Green Belt, it does not appear to be as contentious a site as other sites that have been identified for potential release. Outline planning permission has been granted for housing at this site. Assuming that this land is removed from the Green Belt, the site is likely to be developed within 5 years, and therefore has the potential to contribute to the five year housing land supply.

3.5 Section 3.36 (page 14) of the 2012 SHLAA states that 'there are no wholly apartment/high density schemes within the identified SHLAA supply'. Recently, planning permission was approved for 2 No. apartment blocks (to provide 24 apartments) on land at Thingwall Hall (planning application: 14/00085/FUL). This site is just under half a hectare in size, giving a density of 48 dwellings per hectare.

3.6 This latter site is part of the Thingwall Hall development, which has planning permission for 525 dwellings. The area of land, where there is an intention to build the 24 apartments (following the grant of planning permission) was originally ear-marked for seven detached properties. Not only do the new plans increase the density, but there are now likely to be more than 525 new units constructed at the overall site. This factor is mentioned in Section 6.2 (page 20) of the Planning Statement (produced by Turley Planning) which accompanied this planning application.

3.7 It is worth noting, that in the adopted Replacement Knowsley Unitary Development Plan (2006), under Policy H2 'Sites allocated for housing development', Thingwall Hall (site H4) has an estimated capacity of 350 dwellings. This site currently has planning permission for 525 dwellings (presently under construction). Additionally, as has been indicated above (and recognised in the planning statement, that accompanied the recent planning application for apartments here), this figure is likely to be higher still.

3.8 The Pinnington Place, Hutyon development (planning application: 13/00782/FUL) is for 20 flats in two buildings, another example of a high density development.

3.9 This shows that some of the assumptions made within the 2012 SHLAA are no longer valid. These factors would also suggest that exceptional circumstances do not exist for removing other sites from the Green Belt, and the subsequent harm that will be caused to the Green Belt in those areas.

4. New sites, not identified in the Initial Housing Land Supply (November 2013)

4.1 Section 3.3.77 (page 36) of the Housing Position Statement states that 'in recent years, Knowsley has achieved significant numbers of housing completions on sites that are not allocated.'

4.2 A number of sites that are not identified in the Initial Housing Land Supply have subsequently been given planning permission. These include planning permission for

application 13/00560/FUL – conversion of office building to 5 No. apartments (Prescot Citizens Advice Bureau, 10 Church Street, Prescot).

4.3 Also, the site of former storage tanks, Blundell Road, Prescot (planning application 14/00488/OUT) erection of 3 No. three-bedroomed houses.

4.4 There are also some submitted planning applications (not yet decided) for sites not identified within the IHLS.

4.5 Mention has already been made of sites that came forward in the 2012 SHLAA, which had not been mentioned in the preceding SHLAA.

4.6 Additionally, there is the potential contribution from conversions. Between 2003/2004 and 2011/2012 there were 191 conversion gains (Knowsley Housing Position Statement). This gives a mean of 21 per year. Whilst there have also been some losses to conversions, there has been a net gain from conversions. The conversion gains show the potential from this source. This potential will now be higher due, to the easing of Government restrictions on the conversion of former office space to dwellings.

5. Proposed new boundary of Green Belt at site KGBS20 (East of Halewood (South))

5.1 The Green Belt Technical Report (TR03), produced in July, 2013 claims that the existing Green Belt boundary at site KGBS20 (East of Halewood (South)) is inconsistently defined by Baileys Lane and development which encroaches into the Green Belt in places, along here. Knowsley Council believe that Finch Lane will provide a clear and defensible Green Belt boundary. At the public inquiry in November, 2013 it was pointed out that by pushing the present, clearly-defined Green Belt boundary further out to the east (to Finch Lane), this would not make this boundary more clearly defined, or more defensible (in fact quite the reverse).

5.2 It was highlighted at the November sittings, that a football academy (the Everton Finch Farm complex) has been given planning permission in recent years, on land along the eastern side of Finch Lane (within, and completely surrounded by, Green Belt land). At the time that this was given planning permission, it was recognised by Knowsley Council that the complex was not really appropriate for a Green Belt site, but that special circumstances existed, to outweigh the harm that would be caused to the Green Belt.

5.3 This football academy occupies what was previously open farmland. In addition to a number of new buildings, there is an access road, areas of car parking, hard surface pitches (and associated lighting). The site is now enclosed by high fencing. Most of the site is screened by bunding and landscaping (comprising dense plantings of trees and shrubs), and there are some solid, wooden screening fences in places.

5.4 Formerly (prior to the development of the football academy), unrestricted views were affordable looking east and north from Finch Lane, across the open, unenclosed farmland. The only site along Finch Lane, adjacent to the football academy, where there is a present sightline extending beyond the perimeter boundary, is at the main entrance into the site.

5.5 A planning application (14/00665/FUL) has recently been submitted to Knowsley Council for what is described as Phase One of the expansion of the football academy at this location. The fact that this planning application refers to Phase One, suggests that other phases are planned. The current planning application includes the erection of a new building, extension of an existing building and the creation of additional car parking spaces. These are all proposed developments that will encroach into the Green Belt here, increasing the mass of built development at the site, and if approved, ensuring that Finch Lane will become a poor boundary. If the Green Belt boundary is pushed to Finch Lane, this will result in an unclear, weak boundary to the Green Belt (especially in consideration of further planned phases of expansion for the football academy).

5.6 Removing site KGBS20 from the Green Belt, will result in a clear intrusion into what is presently open countryside, reducing the separation distance between the built-up areas of Liverpool and Widnes. This will result in harm to the Green Belt, and the reasons for keeping land in it.

Paul Slater (representation identification no: 005)

November, 2014

References

Green Belt Technical Report (Document TR03)

Initial Housing Land Supply (November, 2013) (Document AD38)

Inspector's Preliminary Assessment of Land Availability (November, 2013) (Document EX23)

Knowsley Housing Position Statement (July, 2013) (Document SD22)

Knowsley Local Plan Monitoring Report (2012)

Knowsley Strategic Housing Land Availability Assessment (2011)

Knowsley Strategic Housing Land Availability Assessment (2012)

Knowsley Unitary Development Plan (Replacement Plan, 2006)

National Planning Policy Framework (2012) Produced by the Department of Communities and Local Government

P.Slater (Representor No:005) - Representations regarding the emerging Knowsley Core Strategy (December, 2012 and July, 2014)

Planning for Housing Growth in Knowsley (July, 2013) (Document TR01)

Planning Statement for Thingwall Hall (Phase 2) Knowsley (June, 2014) produced by Turley Planning

Sub National Population Projections Update (Document SD31)



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

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.

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 21st 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 21st 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 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 16th 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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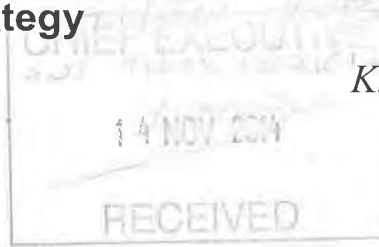
Signature Paul Woods **Date** 6th Nov 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

Knowsley Council



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

PART A - PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|-------------------------------|--|----------------------|
| Title | 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 | | |

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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...

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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 *11.11.14* November 2014

Local Plan Team, Knowsley MBC,
1st Floor Annex, Municipal Buildings,
Archway Road, Liverpool, M36 9YU.

Dated: Thursday 13th 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

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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"/> | |

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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.

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.

- 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...

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

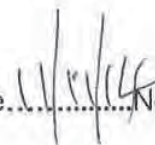
b) Yes, I wish to participate at any further public hearing

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.....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
- 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 | 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 | |

**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

All relevant

Policy Ref

All relevant

Paragraph Ref

All relevant

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

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

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

Consultation Process

I would like to make clear that I wholly reject the assertion made in section 1.3 of the guidance notes of this form (CS Mods Response Form and Guidance PDF), which states

"Comments are sought specifically on the proposed modifications to the Plan. This is because parts of the Plan which are unchanged have already been subject to consultation and discussed at the Examination hearings. "

I reject this on the grounds that the Council's claims that enough people were informed of the consultation process are unfounded, with myself and hundreds if not thousands of others being completely unaware of the Consultation Process or the Local Plan even existing until after these important consultation periods had ended.

Also although a lot of information may exist at the specified website address, a lot of residents are unaware of it and some do not even have access to or use the internet in the first place, which is what the entire consultation process is more or less designed around, excluding further people from the process.

The 'signage' around the proposed sites for removal of the green belt, which amounts to a single A4 sized notification tied to a nearby lamppost along the whole perimeter of the sites do not sufficiently inform local residents who live outside the 200m 'notification zone'.

CONTINUED....

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

If the council has not properly informed its constituents of the consultation process, then there is no way that that process can then go on to be legally compliant or sound. Huge swathes of people concerned and affected by the Local Plan have not been informed of the consultation until after key phases were completed and therefore those phases cannot be considered to be valid.

Continue on a separate sheet if necessary...

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

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

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

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

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.



St. Helens Council

Cllr R McCauley
Democratic Services

**Cabinet Member –
Regeneration, Housing,
Planning & Community Safety**

Tel: [REDACTED]

[REDACTED]

12 November 2014

Dear [REDACTED]

Knowsley Local Plan Core Strategy: Proposed Modifications

Thank you for consulting St. Helens Council on the modifications being proposed to the Knowsley Local Plan Core Strategy. St. Helens Council has not previously raised any objections to Knowsley, however given the significant modifications being proposed we now have concerns. On behalf of St. Helens Council I would like to make the following as a formal representation. The focus of our comments relate to the changes being made to the proposed Urban Extensions.

Housing Land Need and Supply

Whilst acknowledging the need for housing in Knowsley and that only so much can be accommodated in the urban area, these sites were originally meant to meet longer-term needs. We note that given the Inspectors initial findings he views these sites as contributing to meeting needs prior to March 2018 and that this is the reason for the modifications. Whilst we acknowledge that you cannot demonstrate a five year supply of deliverable housing sites at present we doubt whether these sites will actually meet the needs prior to March 2018 given: the time until adoption of the Core Strategy; the time for master-planning; the time for preparing, submitting and deciding an a planning application; and the time for site enabling. Given the attractiveness of such green field sites to developers, due to their better viability, redevelopment of brown field sites in the sub region could be compromised.

Lack of Information

In the previous approach St. Helens was comforted that the detail of impacts of such sites upon St. Helens would be dealt with at a later stage. Now these sites are being promoted for removal from the Green Belt on adoption of the Core Strategy they need to be looked at in detail now. St. Helens is concerned that the approach and evidence to support these sites removal is light touch. Whilst this is acceptable for identifying a strategic location, as with the submission version, it is not acceptable for an allocation of land. We are particularly concerned about the site at South Whiston (SUE 2c) which could accommodate around 1,500 new dwellings. We note that a Supplementary

Planning Document to look at the detail for the site is going to be prepared. Ideally the content, detail and evidence for this should have been produced alongside this consultation whereby we could assess the impacts upon St.Helens with better information. In this regard we have particular concern about traffic generation arising from such a development on Blundells Lane and Mill Lane. Some residents may well use these routes as short cuts to Rainhill, St.Helens and Junction 7 of the M62. More detailed analysis and impacts of such traffic generation is required.

Schools

There already exists a significant interaction of Knowsley residents accessing school places in south St.Helens due to the quality of the schools in the area. This not only creates local traffic but pressure on schools places. A further 1,500 homes on the South Whiston site will add to this situation. Further information is therefore requested on the impacts of this and the proposed mitigation on both highways and schools capacity in the area.

Timing of Sites Being Allocated

Given the lack of information at present and our concern about the impacts on St.Helens it is our view that the sites should not be released from the Green Belt until the supporting Supplementary Planning Documents have addressed the concerns outlined above and been adopted.

I attach a copy of the completed representation form for assistance.

Yours sincerely



Cabinet Member – Regeneration, Housing, Planning & Community Safety

Knowsley MBC note - representation form not included with letter

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

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

Hello [REDACTED]

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

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

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

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

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

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

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

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

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

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

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

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

Rachel

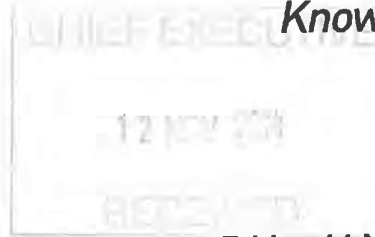
Knowsley Lane resident



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



RETURNING THIS 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 | 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.*

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

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

Paras:

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

See attached sheets

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

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

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

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

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

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

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

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

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

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

Signature



ate 03/11/2014

KNOWSLEY LOCAL PLAN: CORE STRATEGY

Submission and Objections regarding proposed modifications

Ray Davis
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

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

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

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

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

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

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

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

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

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

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

Proposed Modifications to the Submission Local Plan

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

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

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

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

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

“Councils must protect our precious green belt land”

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

KGBS 14 - South of Whiston

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

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

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

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

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

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

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

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

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

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

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

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

CS5 - Green Belt

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

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

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

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

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

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

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

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

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

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

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

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

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

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

CS14: Principal Regeneration Area – Prescot Town Centre

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

Prescot town centre is run down and irrelevant in retail terms, even the council have had to move offices to an ex pub at vast expense, just to fill another empty building. When the council allowed Tesco to build a massive supermarket at Cables 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 Prescott town centre. Consequently, the amended policy would also continue to have the potential to have a positive effect on the objectives relating to poverty and deprivation; increasing the number of new businesses; enhancing the vitality and viability of town and local centres; and maintaining high and stable levels of employment and reducing long-term unemployment.

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

CS21: Green spaces and Trees

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

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

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

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

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

CS22: Sustainable and Low Carbon Development

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

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

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

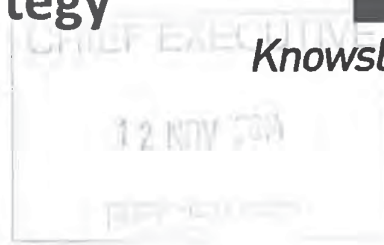
Once again this point is totally at odds with other statements and shows that there would be a negative effect on the objectives that relates to poverty and deprivation; and health.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



RETURNING THIS FORM

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

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

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

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|---------------------------------|-----------------|
| Title | Mr | |
| Name | 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

POLICY CS3 TARGET 129 ID:96

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

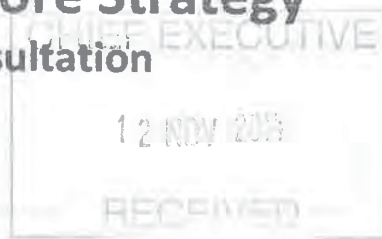


Knowsley Council

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 | RAY GOUGH | |
| 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

RAYMOND COUGH

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

Modification Ref

Policy Ref

16 CBS14

Paragraph Ref

E 1

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 this negative object to the local area, reason given, a threat to my home (Being on Halmes Park which is in the centre of proposed building of closer houses, also the problems caused to the infrastructure of local roads which struggle to cope with the local traffic now. The increase of population on the Medical side of this area i.e. Hospital: Medical Centres: Schools: Also the release of Green Belt in South Whiston will contradict the purpose of Green Belt to retain attractive landscapes and enhance landscape near to where people live

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 council should take account of the guidance published by Mr Eric Peckles MP in regard of protecting greenbelt on the 16 October 2014
Also take into account the latest population figures produced by the O.N.S. in 2001
Carry out a up to date traffic 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.

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Signature



Date

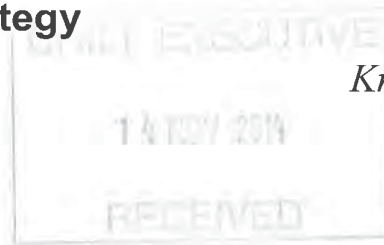
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PART A - PERSONAL DETAILS

| | 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 | [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)



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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.

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...

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Signature

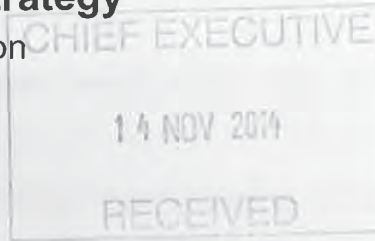
[Redacted Signature]

Date ^{11TH}.....November 2014



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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 | | |

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PART B - YOUR REPRESENTATIONS

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Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

- | | Yes | No |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input 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.
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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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Signature

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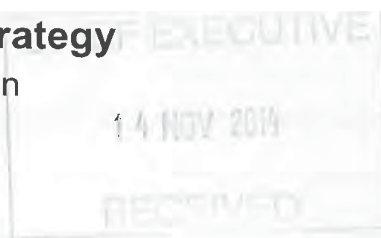
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| | Personal Details* | Agents Details* |
|-------------------------------|--|----------------------|
| Title | MR | Solicitor |
| Name | RICHARD GEORGE ROBINSON | Middleton Solicitors |
| Job Title (if appropriate) | RETIRED | |
| Organisation (if appropriate) | Save Knowsley Village Green Belt Group ✓ | |
| Postal Address | [REDACTED] | |
| Postcode | | |
| Telephone Number | | |
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Name and/or Organisation

Save Knowsley Village Green Belt Group

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Modification Ref

Policy Ref

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Paragraph Ref

2 and 6A.9

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- | | Yes | No |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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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 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 Signature]

Date: 11.11.14 November 2014

From: Hennity, Richard (Santander UK) [REDACTED]
Sent: 12 November 2014 17:48
To: [REDACTED]
Subject: Planning Objection Core Strategy ref KGBS20
Attachments: ATT00001.txt; ATT00002.htm

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

OBJECTION: Proposal to remove land from the greenbelt East of Halewood South (Core Strategy ref KGBS20)

Dear Sirs,

I write with strong objection/challenge to the Council's proposed plans to remove the current land situate at East of Halewood (South) as determined in the Knowsley Local Plan Core Strategy document (revision July 2013) as KGBS 20.

I am a resident and owner of a property in the nearby vicinity (Sandhurst Road) and as such my objection herein is specific to the land that abuts Higher Road (and the adjacent lay-by) and Aldersgate Drive.

Under said document there is already enough housing stock proposed without the need to encroach and develop the aforementioned land.

At present the existing lay-by would essentially mean that the traffic flow would be channelled through an already over used road designed and developed only for use of the very small cul-de-sac it serves.

Not only this but the junction at Aldergates Drive / Higher Road and the roundabout there is already extremely over congested due to the flow of traffic from Runcorn and the Knowsley Express Way and also due the continued extension of Jaguar Land Rover (JLR) to the rear and the traffic this brings.

Such a traffic increase is particularly concerning to us (as parents) who have chosen a specific location to reside in, to allow our children to grow up in an area as highway safe as it can be.

At present the land is used for grazing (horses) and is considered a nature conversation which following any planning framework or agreement would effectively see this use disappear..

Furthermore, as with any planning consent today, there would of course need to be a provision for affordable housing, which together with a mass development, could have a material detrimental impact on the value of our property prices.

As residents we already suffer the continuous planning approvals and subsequent development works that JLR are consistently doing, that the land the faces our cul de sac is our only respite / greenery from this.

You will no doubt be aware of the current parking (of lack thereof) that we have from the previous impractical design & development of our road and planning decision will only add exacerbate this.

In respect of the large planning scheme and the numbers proposed re housing stock for KGBS20 - the local economy and services simply cannot fulfil this. Have the council given further consideration to local amenities and schools and the pressure this will not only put on them but for the ability of the current residents to freely choose their children's schooling etc...

You may be interest to note that as at the time of writing there were 161 properties for sale in the L26 postcode and 15 available to rent. As I understand it the proposed housing stock will be aimed at owner occupiers which at the present time such evidence suggests that this is not needed.

This only leaves me to believe that is the intention of the Council and any subsequent developers to build to sell as investment, which surely detracts from the whole purpose of creating good affordable housing stock in the first instance.

This application is **strongly objected to** and I ask (rather urge) the Council and it's committee members to reconsider in light of the above.

Yours faithfully

Mr R Hennity
Resident and Owner





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 | 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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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 they 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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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 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... 

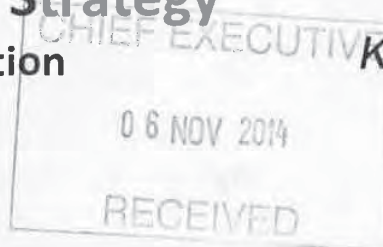
Date... 12 November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MR | |
| Name | ROY HARDMAN. | |
| Job Title (if appropriate) | | |
| Organisation (if appropriate) | | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation MR R HARDMAN

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

Modification Ref WHISTON
STH.
MIGS. Policy Ref 1/2c. ^{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 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...

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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

6/11/2014

UNACCEPTABLE HIGH DENSITY/ OVER DEVELOPMENT OF THE SITE WOULD LOSS THE OPEN ASPECT OF THE NEIGHBOURHOOD, REMOVING THE BUFFER BETWEEN WHISTON AND THE MOTORWAYS M57/62.

- 8) THE ROAD NETWORK IS ALREADY AT BREAKING POINT AT TIMES, MORE CARS WILL ONLY ADD TO THE CURRENT PROBLEM.
- 9) NEW HOUSEHOLDS ON GREENBELT LAND WILL CREATE NEW INCREASED CARBON EMISSIONS FROM INCREASED POPULATION, TRANSPORT ETC. ETC, WHERE THERE WAS ONCE GREENBELT. THIS IS CONTRARY TO THE GOVERNMENT'S POLICY TO REDUCE GLOBE WARMING.
- 10) INCREASE IN TRAFFIC WOULD INCREASE NOISE, POLLUTION AND INCREASE IN CO² GASES WHICH COULD EFFECT THE HEALTH OF THE POPULATION IN WHISTON.
- 11) COUNCIL SERVICES ARE UNDER STRAIN AT PRESENT, DUE TO BUDGET CUTS, INCREASING THE HOUSING STOCK IN KNOWSLEY WOULD ONLY INCREASE THESE PRESSURES.
- 12) I URGE THE COUNCIL NOT TO CONSIDER BUILDING ON THE GREENBELT OR FARMLAND BUT TO UTILISE THE NUMEROUS BROWN FIELDS SITES. THIS WOULD MORE THAN MEET THE CURRENT HOUSING DEMANDS IN THIS AREA.

WHEN GREENBELT LAND HAS BEEN DEVELOPED, ITS LOST FOR EVER.



6/11/2014.

[REDACTED]

From: Roy Turrell [REDACTED]
Sent: 13 November 2014 22:10
To: [REDACTED]
Subject: re:- Knowsley Local Plan (KGBS 14)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Pike,

I am writing in order to oppose the Council's plans to allow building to be carried out on greenbelt land. Due to time constraints i cannot go into great detail but wish the following points to be considered...

* the 'need' for housing expressed by the council is fatuous....population growth is a fallacy in this area and has been in decline for many years

*brownfield sites are readily available in the area

* damage to wildlife/areas of environmental interest....any development would have a detrimental effect on the area as a whole

* over burdening already stretched medical/educational facilities in the area

I hope you will take into account the strong feelings of the whole community with regards to these plans and force the council to rethink their strategy.

Mr. Roy Turrell
[REDACTED]



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

RECEIVED

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-----------------------------|-----------------|
| Title <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

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 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...

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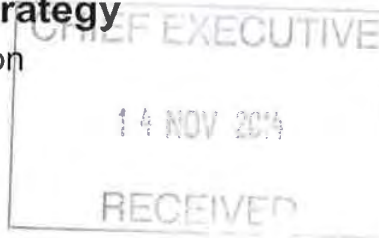
Date 01/11/2014



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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 | [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

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)

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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.

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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 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 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

CHIEF EXECUTIVE

11 NOV 2014

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MISS | |
| Name | S. STONE | |
| 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.

I wish to object.

- ① The housing figures are too high. People in Hatwood cannot sell their houses as it is.
- ② Only a few fields separate Hatwood from Cranston, Wickes and Spike. We also have an airport and the expressway. Inhibits open space and fresh air.
- ③ The fields are productive farmland, and full of wild life.
- ④ I am concerned about building on the flood plain.

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.

See 3.

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 10.11.14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE
Knowsley Council

12 NOV 2014

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MRS | |
| Name | SANDRA CASSIDY | |
| 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 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 would object to the release of this land as the majority of this site is classified as grade 2 Best and most versatile agricultural land and that parts of the site have been farmed for many years. None of the objections will meet the objectives 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 the 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 government's emissions reduction targets and carbon budgets.

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 MP recently advised planners
to take more care of our GREENBELT.

LISTEN TO HIM.

Take account of recent ONS figures on
Population

Re convene public inspection

Continue on a separate sheet if necessary...

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

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

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

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

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Signature



Date

1/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|----------------------------|-----------------|
| Title | MRS | |
| Name | SARAH HINDLEY | |
| Job Title (if appropriate) | TEACHER. | |
| Organisation (if appropriate) | LIVERPOOL CITY COUNCIL. | |
| 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 SARAH MINOLLEY

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

Modification Ref Policy Ref KGB514 Paragraph Ref ES

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 would object to the removal of land at Whiston from the green belt for the following reasons.

- 9 out of 10 people use our parks and open spaces & value them - people satisfied with local parks are generally satisfied with their council.
- the higher the quality of green space the more likely it is to be used.
- to build over 1,500 houses on Best+Most Usable Grade 2 Agricultural land cannot enhance green 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.

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

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

Reconsider the public inspection.

Continue on a separate sheet if necessary...

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

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

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

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

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

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 | SCOTT CUNNINGHAM | |
| Job Title (if appropriate) | SCOTT CUNNINGHAM | |
| Organisation (if appropriate) | Public Services | |
| Postal Address ▲ | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

KG B 14

Policy Ref

EC 1

Paragraph Ref

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

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

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

The protection of GREEN BELT LAND!

If the said proposals go through our children will only grow up with bricks and motor in our neighbour hood and not trees, wild flowers, wild birds and the beautiful green land we can see. Our local character will be lost for ever. The history of our once milking community will also forever too.

Continue on a separate sheet if necessary...

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

MP Eric Pickles has already said we are using green Belt land too much and should look at Brown land.

Use the housing we already have.

Also to take into account the ONS regarding the population figures for 2014.

The transport survey is so out dated and needs to be converted up to date for public inspection for correct numbers.

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 1.11.14

[REDACTED]

From: Sharon [REDACTED]
Sent: 10 November 2014 17:31
To: [REDACTED]
Subject: Proposed plan for the use of green belt land in halewood and Knowsley

Follow Up Flag: Follow up
Flag Status: Flagged

I am writing to object to the proposed use of the green belt land.

The reason why I object are:

1. Knowsley's proposed housing figures are too high
2. The most recent government forecasts show a lower rate of growth in Knowsleys population, than previous forecasts used by Knowsley council.
3. The resulting urban sprawl will reduce the separation distance between Liverpool and widnes.
4. Peripheral development at halewood will result in over reliance upon cars.
5. Local roads and lanes will become busier and more congested.
6. There will be clear intrusion into the countryside, on the edge of Liverpool.
7. There will be loss of some of the highest quality, and most productive farmland in the country.
8. There will be loss of farmland, wildlife, including species such as Skylark, Lapwing, Grey Partridge and Brown Hare. These are all species which are declining nationally, and will be under threat of local extinction, if their habitat is built upon.

Regards
Sharon Murphy
[REDACTED]

Sent from my iPad

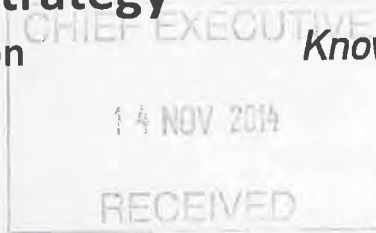


Knowsley Local Plan: Core Strategy

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 | SHEILA BERRY | |
| 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 would like to object to the land being released from the greenbelt.
If you consider the importance of the amount of carbon in UK soils (organic matter) 10 billion tonnes, Soil has a necessary role to play in combating climate change
With reference to the Government's emission reduction targets + carbon budgets, introduced by the Climate Change Act 2008 Defra Soils Policy team, - I do not think any of the options will meet the objective to restore land + soil quality.

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.

Re-convene public inspection .

Look at recent O.N.S figures on population

Take care of our environment as Eric Pickles M.P has recently advised planners to take care of our greenbelt .

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

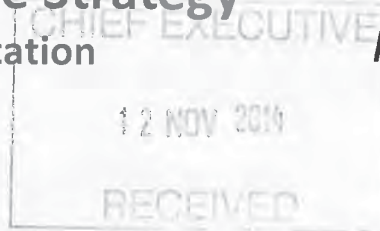


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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MR | |
| Name | STEPHEN WAINST. | |
| Job Title (if appropriate) | TAXI DRIVER. | |
| 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 STEPHEN WALSA.

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

Modification Ref Policy Ref KGBS14 Paragraph Ref E1-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 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 AREA IS ALIVE WITH LOCAL WILDLIFE SOME
PROTECTED. NO THOUGHT HAS BEEN TAKEN ON THIS.
LOSE IT NOW ITS GONE FOR EVER. TIME TO
PROTECT IT FOR OUR CHILDRENS CHILDREN ETC
DESTROY THIS NOW AND ITS GONE FOR EVER
NOT JUST WILDLIFE THERE ARE MANY
RARE PLANT LIFE ALSO

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 MP recently advised.
Planners to take more care of our
Green belt.

Take account of recent ONS figures.
on population

R.B. Convene public inspection.

Continue on a separate sheet if necessary...

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

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

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

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

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

1-10-14.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



RETURNING THIS FORM

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

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

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

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

PART A – PERSONAL DETAILS

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

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

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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 See below

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

Modification Ref Policy Ref KGBS14 Paragraph Ref E1-E9

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

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

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

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

Continue on a separate sheet if necessary...

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

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

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

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

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

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Signature 

Date 1st / 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 | TE OGWONWA | |
| Job Title (if appropriate) | Self Employed. | |
| Organisation (if appropriate) | None | |
| 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 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.

It would seriously damage the character of Whiston and will overload the infrastructure.
we have to think of future generations, the loss of arable greenland, loss of jobs for local farmers will cause a lasting effect
Bee keepers are essential in any community for the polanation of food planks If there is no fields there are no plants or Bees
We will need new school & Dr Surgery
There is at present very little parking spaces. The noise now from traffic is unacceptable & air pollution
It is now almost impossible to cross Windy / Moor Rd

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 MP, on 16th Oct 2014. Carry out upto date transport survey.
Take into account latest population figures from .Re convene Public Inspection

Continue on a separate sheet if necessary...

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

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

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

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

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Signature



Date

12/11/2014



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 | |
| 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 council's 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 as 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 council's 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).

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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: 13th November 2014

POLICY CS3 TARGET 150 ID:550

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

POLICY CS3 TARGET 151 ID:551

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 Knowsley's 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 taken 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

From: Tony Docherty [REDACTED]
Sent: 13 November 2014 15:51
To: [REDACTED]
Cc: John Baker
Subject: Representations in respect of Further Modifications to the Submission Document of the Knowsley Local Plan Core Strategy - Weston House
Attachments: Scan_20141113_154507.pdf; Weston House Reprs Doc..docx
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

I enclose here with the following documents in respect of the above, –

1. The Representations Form, and
2. The Representations Statement

Both are given in PDF format. The signed originals will follow in the post tonight.

Please confirm receipt of documents. Thank you.

Kind regards,

Tony

Tony Docherty

ATD
Specialties Limited

[REDACTED]
www.atdspecialties.co.uk

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

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

PART A – PERSONAL DETAILS

| | Personal Details* | Agents Details* |
|----------------------------------|-------------------|-----------------|
| Title | MR. | |
| Name | TONY DOCHERTY | |
| Job Title (if appropriate) | LANDOWNER | |
| Organisation (if appropriate) | n/a | |
| Postal Address | | |
| Postcode | | |
| Telephone Number | | |
| Email Address | | |
| Preferred Method of Contact | | |
| | | |

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

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

PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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.

PLEASE SEE ATTACHED REPRESENTATIONS STATEMENT

Continue on a separate sheet if necessary

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

PLEASE SEE ATTACHED REPRESENTATIONS STATEMENT

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

Weston House

Representations in respect of the Proposed Further Modifications to the Submission Document of the Knowsley Local Plan: Core Strategy September by the Owners of Weston House Representation Reference 128/1220

This Statement is in response to the Further Proposed Modifications to the Submission Document of the Knowsley Local Plan: Core Strategy published in September 2014. The objections are shown sequentially in accordance with the Modification Reference shown in the document and call into question the rationale of the Council in determining the proposed modifications to the Submission Document as well as the implications of modifications to a Local Plan which, as far as Housing Provision during the Plan period is concerned, particularly in the first five years, we contend is fundamentally un-sound. The views expressed in this Statement are those of the Owners of Weston House.

Our Objections to the following Proposed Modifications are as follows: –

1. MO 12. Paragraph 1.2 8A

We contend that Planning Policy Guidance has not been strictly followed in the making of the Local Plan insofar as the acceptance by Knowsley that their housing number projections were substantially wrong, has meant that, in order to achieve the correct housing numbers, the Local Plan would have to be significantly altered. This, in turn, meant immediately abandoning the phasing mechanism for the release of Green Belt land which had been a mainstay of the original Plan, and as an expedient measure sanctioning the removal from Green Belt of substantial Parcels of Land without thoroughly and efficiently investigating how a significant portion of the housing number deficit could be achieved through the development of smaller Parcels of Land in the Green Belt in, including the land known as Weston House.

The Owners of Weston House had earlier informed Knowsley in the meeting which took place months before the Public Hearing commenced that, according to their Consultants, the housing numbers being projected by Knowsley were substantially inadequate. This was dismissed as being totally incorrect, and yet within the first week of the Hearing Knowsley had accepted the view of those attending the Hearing that their calculations were wrong and that they needed to not only re-calculate the housing number requirement, but make Modifications to the Plan which addressed the issue of how the new numbers could be achieved, and the only way to do this was to abandon completely the original Plan with regard to housing and create a new Plan. In our view expediency and time constraints resulted in not enough attention being paid to Planning Policy Guidance, or if attention was paid then it was simply ignored. This is not the proper way to develop and adopt a sound Local Plan.

2. MO15. Paragraph 1.36

Significant points were raised by us in relation to Planning Policy Guidance, the NPPF, and the important issue of the Green Belt, in that Consultation and the subsequent Representation but these

Representations in respect of Further Modifications to the Submission Document November 2014

appear to have simply been ignored. The views expressed by our Consultants were based on their own professional expertise, wide-ranging experience over many years including advising on the matter of urban fringe Green Belt, as well as attendance at many other Local Plan Examination Hearings, and yet these professional opinions and judgement appear to have counted for very little.

3. MO22. Paragraph 1.43

We contend that the Risks to the delivery of the Housing Trajectory Projections for the 15 year period have not been properly addressed. The relatively brief period of time in which the original phasing mechanism for the release of Green Belt has been completely abandoned, and justifiably so, has meant that there has simply not been enough time to give proper consideration to the effect on both Knowsley and Landowners/Developers of moving from 'famine' in the first five years to 'feast' in the same period, in terms of Development potential. All sorts of issues may arise - Landowner Intentions, Availability of funds for Development, the Business environment, Political issues, Infrastructure implications and costs, and of course, last but not least, the issue of Developer Contributions. The Housing Trajectory numbers in the first five years rely heavily on the SHLAA sites many of which have been available for years with Knowsley being unable to persuade Developers to take them on, and the new Sustainable Urban Extension sites, and in particular three very large sites. We are heading towards the end of the second year of the Plan period, and it does not take a great deal of imagination to envisage issues, problems, hold-ups, disputes on the part of both sides which are likely to ensure that the projected housing numbers for the first five years will not be achieved.

4. MO30. Paragraph 2.15

Following on from the above, we have in this paragraph a clear admission from Knowsley of their very poor historic record of Net Completions in the period 2002/3 to 2012/13 -an average of 189 per annum, and yet we are asked to believe that in the remaining three years of the first five-year part of the plan more than 1000 houses per annum will be constructed. That seems to us highly improbable, and, as a result we cannot understand the reluctance of Knowsley to include the smaller Additional Reserve sites, including Weston House which are available, in single ownership, and deliverable within a very short period of time. It appears to us that the main reason for this is the decision by the Inspector, in his Findings following the initial Hearing, that Knowsley did not need to consider such sites. This, in our view, appears to have been taken by Knowsley as a strict instruction rather than either an observation or a piece of advice. No explanation for the Inspector's Finding has ever been proffered by the Inspector to date, and therefore it has been impossible to present a cogent argument to Knowsley to gainsay the Inspector's decision. This is unreasonable and inequitable. Without a stated reason, it must be assumed that the Inspector believes that the combination of developable land for housing from the SHLAA sites and the SUE land parcels provide Knowsley with the potential to construct their target number of houses in the Plan period, and that therefore the inclusion of smaller sites like Weston Park is unnecessary. We believe that this opinion, if it is correct, does not take into account the significant difficulties which may be encountered during the Plan period in bringing the development of the SUE sites, particularly the three very large sites, to fruition. Nor does it take into account the fact that, currently, Knowsley do not have a five-year supply of land to achieve the housing numbers needed in this period. We take the view that the intention of Knowsley to make up any shortfall in this period, during the remainder of the Plan

period is facile and disingenuous, given the long history of poor completions referred to earlier. On this basis, we believe the Plan, as it stands is not sound, and that further review is required.

5. MO57. New Paragraph 5.2 0A

In the Local Plan and the Supporting Documents the desire to "Re-balance the Housing Market" in Knowsley, is frequently stated, and yet the emphasis is always on the provision of Affordable and Supported Housing. In our opinion, no emphasis is given in the Plan for the development of 'aspirational' properties for the upper end of the market to support Industrial and Business activity in areas like Halewood. It is important, if possible, to encourage the owners, executives, managers and senior personnel of the businesses which are based in Knowsley or close to it, to actually live in the area. To do that, Knowsley need to facilitate the building of appropriate houses, and yet one imagines that the great majority of the senior figures who make their living in Knowsley depart at night for the leafier parts of Cheshire or West Lancashire, in part, at least, because there are very few, if any, developments which might satisfy the needs of those individuals or their families in Knowsley. We believe that Knowsley lose out in this respect, and will continue to do so, because such developments help to raise the bar in terms of social and economic development, but if they do not exist or are not encouraged, then no benefit is gained. Knowsley were very happy to allow the development of the Everton Football Club Training Facility at Finch Park, and yet we have to ask ourselves how many of the very highly paid young men who attend there every day have ever considered buying a house in close proximity to Finch Farm? The simple reason for this is that there are no suitable properties, and so these individuals purchase their homes in the Wirral, Cheshire or in the Formby/Southport areas. The Weston House site, with its woodland setting, has been described by the major Developers who have visited the site and who are interested in it, as perfect for that type of development.

6. MO60. Knowsley Housing Trajectory.

We contend that the figures used are understated and that therefore the trajectory is incorrect. In a previous Representation made to the Re-convened Hearing July 2014, we estimated that the final five-year housing requirement was 3592, taking into account the backlog of 743 houses and the 20% Buffer required by the NPPF for Local Authorities with a consistent track record of poor completions. According to their own trajectory, Knowsley estimate that even if they remain on target during this first five-year period, which seems highly unlikely, they will construct approximately 2800 houses, a shortfall of 792 houses which means that the current backlog is, in effect, being carried forward by design into the second five-year phase of the Plan. This position appears to have been accepted by the Inspector. However the council cannot say, in our opinion, that it is impossible to deal with the requirement to deal with any backlog within the first five years of the Plan period, as required by the NPPF "**where possible**" (our emphasis) whilst refusing to consider the smaller Green Belt sites such as Weston House. Although it is currently in the Green Belt, the full analysis submitted by Weston House shows the site does **not** have a critical role in fulfilling the purpose of including land in the Green Belt and could be developed without any significant impact on the integrity of the Green Belt or its ability to perform the role for which national Green Belt policy was created. The Core Strategy is substantially changing the Green Belt extent and boundary, and is including for development many Green Belt sites which are, in some cases at least, clearly much more important to the Green

Belt purposes than Weston House. Western House meets all the tests shown in Paragraph 47 of the Framework for a site to be counted as part of the supply for the next five years.

7. MO76. Policy CS5 Clause 1

We contend that Knowsley pay deference to the NPPF (and to previous Planning Regulations and Guidance) when it suits, but appear happy to override the Framework and the previous Regulations also when it suits. For example, what were the "very special circumstances" that led to the granting of a Planning Permission in 2002 for the construction of six houses on land adjoining Weston House which is also in the Green Belt, and where the projected houses have still not been constructed, or for giving an 'In Principle' approval for the land in Bank Lane Kirby (well in advance of the site being designated as a SUE), and which we understand has now been converted to full Planning Permission? Where is the consistency, transparency and fairness with such decisions in comparison to the decision not to include smaller sites like Weston House in the Local Plan?

8. M168. New Chapter 6A Sustainable Urban Extensions

In principal, we support the creation of the Sustainable Urban Extensions, because once Knowsley had accepted that its housing numbers were substantially wrong, it became obvious that it could not rely upon the SHLAA sites alone, as it had intended, to deliver the housing numbers needed in the first five years of the Plan, and that as a result a change in strategy was needed, and this led to the creation of the concept of the SUE. There is nothing wrong with that, apart from the fact that Knowsley now appear to have adopted a doctrinal and doctrinaire approach to the selection of sites in the Green Belt for development over the Plan period, preferring to rely on larger (and in some cases extremely large) Parcels of land within the Green Belt, and have eschewed the possibility of achieving the required numbers by balancing any shortfalls from those larger sites with housing numbers on smaller sites, like Weston House which are readily available and deliverable within the first five-year period. There must be a very high expectation that some of the sites will not be developed in line with the trajectory the plan now contains, and for sure, Knowsley has not provided convincing evidence to support the view that the SUE sites are deliverable in total, and in these circumstances, we maintain that the Plan should take the opportunity presented to increase its flexibility and hence the confidence in the supply by adding further highly deliverable sites such as Weston House.

9. M243. Paragraph 10.19 Developer Contributions

We take the view that not enough detailed consideration has been given to such contributions, and the position which may arise if the developers are unable or unwilling to fund the level of contributions required by Knowsley. The only alternatives are that either Planning Permission would be refused or that the Authority will have to subsidise the development, neither of which are desirable. Part of the problem here arises from the fact that the SUE sites were not part of the original Plan, and their withdrawal from Green Belt came about as a result of the acceptance by Knowsley that their housing numbers were wrong, and that in order to comply with NPPF they would have to abandon the phasing mechanism in which these identified sites would be released from Greenbelt sometime in years 6-15 of the Plan. As a result, there has been little or no time for consultation with Developers on the matter of Developer Contributions. Setting out the types of Developer Contribution within the Plan is sensible, but getting Developers to agree such

Contributions to the level that Knowsley would like (and needs, given budget constraints) will be an entirely different matter. One can only imagine that very lengthy, convoluted and potentially acrimonious discussions and correspondence will flow between the Landowners, the Developers, and their respective Consultants and Knowsley. Reconciling the interests of individual Landowners/Developers alone, particular in respect of the larger sites, will be incredibly difficult, and this fact was clearly demonstrated at the Re-convened Hearing. Idealistically, Knowsley have settled on the idea of 'Master Planning' as the solution, which, at first glance, seems perfectly reasonable, but getting all of the different parties to agree to a Master Plan and to pay the required Developer Contribution share might prove to be a Herculean task.

At best, this will result in lengthy delays in the actual commencement of developments, particularly those on the three very large sites. At the very worst this position will inhibit the development of some of the SUE sites to the extent that it is likely that, once again, Knowsley will succeed in having a much lower level of completions than the Plan requires. It is acknowledged that even by including all of the smaller sites this position may not be entirely resolved satisfactorily, but it will be mitigated to some extent. Whereas, excluding the smaller sites completely, at least until there is a Review at the end of the five-year period at the earliest, means that Knowsley have denied themselves the additional flexibility that may be needed during the Plan period. This appears to be the triumph of rigid Planning policy over sound common sense and intelligent pragmatism.

10. Policy of KLCPS. SUE 1 (Page 102)

We question the validity of this Policy with regard to the Master Planning proposal, something not considered in the original Plan, and for which Knowsley ought to have addressed through their own Master Plan on this subject, and issued a Technical Document prior to the original Hearing. However because the housing numbers were wrong, and Green Belt land was not going to be released in the first five-year period, no real or detailed thinking has gone into this process, and this was evident from the comments and the disagreements which were voiced at the Re-convened hearing.

The term 'Development Management Process' which has a technically authoritative ring about it, has been used in this Policy by Knowsley, but there are no clear guidelines as to what this means exactly in the context of the SUE Sites. We have to question whether Knowsley have the resources and skills available for this type of complex process, and whether budgetary constraints will allow them to buy in those skills and expertise, if they do not.

We also take the view that the Key Risks shown have been substantially understated and should include:

- Infrastructure difficulties and delays (United Utilities made reference to this in a previous Representation when commenting on and welcoming the decision of Knowsley to consider the development of land owned by Utility Companies)
- The unwillingness of Landowners/Developers to meet the expectations of Knowsley with regard to Developer Contributions
- The implications flowing from this in terms of subsequent delays, financial restrictions (on both sides) and failure to deliver the required housing.

Furthermore, we fail to see how 'Clarification that areas falling outside the SUE's remain in the Green Belt and are subject to Policy CS5' mitigates the Risks to the Policy. In our opinion, such an inflexible approach actually exacerbates the Risks to the Policy, unless, of course, one views the Policy as sacrosanct in itself, rather than acknowledge the reason why the Policy was created, which was to ensure that the required number of houses for the Plan period are delivered.

This is yet another indication that there is an unshakeable conviction on the part of Knowsley that all of the SUE sites will be developed without difficulty or delay and in full during the Plan Period, which we believe is unrealistic, and that there is no need for some degree of flexibility to take into account the potential for a margin of error to upset the Plan. Any worthwhile Master Plan would always assume that things will not always go according to plan, for whatever reason, and that this should be taken into account by the Plan and be allowed for or budgeted for by the Planners. If Knowsley believe that the SUE sites will be fully deliverable without any difficulty or delay, then why identify the Key Risks to the Policy which have been shown, and which, as we have said, are incomplete anyway. To this extent we believe that Policy SUE 1 is flawed, and as it stands the Plan is therefore not sound.

11. Policy of KLCPS. CS27. Planning and Paying for New Infrastructure(Page 120)

The scale of development arising from the SUE sites and the enormous Infrastructure requirements for those sites, particularly the 3 largest SUE sites call into question the validity of Knowsley's Infrastructure Delivery Plan (M I 115) largely because of the very short timeframe which Knowsley have had in which to prepare and/or modify the IDP. Some of these developments are major projects which take a long time to plan and prepare for, and involve, not just the Authority's own technical staff, but those of the relevant Utility and Service Companies. One has to ask just how much real planning has gone into this Policy, and to question whether proper consideration has been given by Knowsley to the Key Risks which have been identified by the Authority, and to pour scorn on the Mitigation Factors presented by the Authority, which loosely translate into 'if problems arise we will be flexible in our resolution of them, and/or if the Plan is not working as we would like it to them we will change it'. In Risk Management terms these would not be considered mitigation of risk: they are simply statements which make it clear that the IDP has not been properly and carefully thought through.

Of course, the biggest risk to the IDP will be the refusal of Landowners/Developers to pay for new Infrastructure developments to the extent that Knowsley will want them to, and there is then the potential for the Authority to be held to ransom by either refusing to grant Planning Permission for all or part of these sites, in which case there will be a serious shortfall in housing numbers for the Plan period, or alternatively for the Authority to have to bear a much larger portion of the Infrastructure Development Costs than it would like or can afford. Again, if the latter is the case, then the development will not take place, and there may be a significant shortfall in housing numbers for the Plan period, as a result.

**OUR PROPOSALS TO MAKE THE PROPOSED MODIFICATIONS REFERRED TO ABOVE
CONSIDERED SOUND ARE: –**

1. MO 12. Paragraph 1.2 8A

Comply strictly with Planning Policy Guidance in terms of dealing with the Housing backlog during the first 5 Year period of the Plan, and utilise the smaller Green Belt sites to enable that to happen.

2. MO15. Paragraph 1.36

Reconsider the points which have been made by our Consultants in previous Representations, and take them on board.

3. MO22. Paragraph 1.43

Review the Risks to the Housing Trajectory Projections and mitigate those Risks by inclusion of the smaller sites like Weston House which are available for development.

4. MO30. Paragraph 2.15

Override the view of the Inspector that the smaller Green Belt sites are not needed for the 15 year Plan, and allow them to be brought into the Plan in order to give it a greater degree of flexibility and to increase the confidence in the Plan with regard to its soundness.

5. MO57. New Paragraph 5.2 0A

Re-assess the meaning of 'Rebalancing the Housing Market' so that it is not completely tilted towards Affordable and Supported Housing, but, instead, also welcomes the sort of housing which is at the other end of the scale and which is important to upgrade the character of the Borough.

6. MO60. Knowsley Housing Trajectory.

Revise the Housing Trajectory figures to show numbers which include the Housing Backlog and the 20% Buffer, and review strategy to allow the inclusion of the smaller Green Belt Sites including Weston House so that this shortfall can be dealt with in accordance with NPPF requirements.

7. MO76. Policy CS5 Clause 1

Either comply fully with NPPF and NPPG or demonstrate an even-handed approach to all Landowners with sites in the Green Belt who would like those sites to be developed.

8. M168. New Chapter 6A Sustainable Urban Extensions

Extend the number of SUE sites to include the smaller Green Belt sites which have been excluded, including Weston House in order to provide a greater degree of flexibility in the Plan to offset inevitable shortfalls which will arise during the Plan period.

9. M243. Paragraph 10.19 Developer Contributions

Recognise and accept that Developer Contributions will be a significant issue and will either create development delays or prevent development happening, and that, as result, greater flexibility in terms of sites to be developed is required, and this implies including smaller Green Belt sites such as Weston House.

10. Policy of KLCPS. SUE 1 (Page 102)

Re-state the Key Risks to this Policy to include those shown above, and modify the Mitigations to the Key Risks to exclude the idea of ensuring that other sites in the Green Belt remain available for development.

11. Policy of KLCPS. CS27. Planning and Paying for New Infrastructure .

Review the Infrastructure Development Plan to acknowledge and to take into account the fact that Planning and Paying for the required new Infrastructure for the major developments which will take place over the next 5/10 years will be a far more arduous and complex task than this Policy and the Plan indicates, particularly with regard to the issue and level of Developer Contributions. This review should be undertaken urgently, and results of the review should be taken into account with regard to other Policies and the Core Strategy itself.

POLICY CS3 TARGET 153 ID:553

From: Tracy Vickers [REDACTED]
Sent: 12 November 2014 13:28
To: [REDACTED]
Subject: Knowley Greenbelt earmarked for housing

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom This May Concern

I would like to lodge my objection to the proposals of concreting over 1,000 acres of Green Belt land across Whiston, Prescot, Huyton, Kirkby, Halewood and Knowsley Village for potential development - including housing.

Whilst I appreciate the need to house the already over-populated areas of Prescot and Huyton for example, it seems a huge shame that what little surviving Greenbelt we have left, is going to be lost to future generations for this means. Society would be greatly impoverished by the diminishment of public green sites such as fields, woodlands, nature reserves and parks, which are essential for relaxation and recreation and for the aesthetics of the place, also for the survival of our local wildlife. The spirit of the town seems to be getting gradually sucked out, as more and more characterless, overpriced housing estates and roads keep popping up at an alarming rate.

As a resident of Prescot, there are few safe open spaces already, and kids in streets such as Shaw Lane have resorted to playing football across roads and on pavements as there is no nearby accessible fields. Many sports facilities at the leisure centre have been lost and remaining pitches are expensive to hire.

This development concerns me for future generations - once nature reserves and open spaces have been built on for housing, car parks and more roads, it will leave dog-walkers, ramblers, nature-lovers etc no-where to go, and the quality of life for many will be affected.

Please take on board my concerns.

Yours Sincerely
Miss T Vickers



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
- > 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 | [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 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.

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