



*Knowsley Council*

# **Knowsley Local Plan: Core Strategy**

**Proposed Modifications Consultation**

**Report of Representations - Volume 5**

December 2014

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## 17 SUE GENERAL

### Representations relating to general issues associated with proposed Sustainable Urban Extensions

Reference	Copies Submitted	Submitted by:	
		Representor ID	Name
SUE GENERAL 001	1	121	A E Sherlock Petition (60)
SUE GENERAL 002	1	123	A G Wortley
SUE GENERAL 003	1	124	A Reid
SUE GENERAL 004	1	125	A S Davies
SUE GENERAL 005	2	128	Alan McNab (1)
		128	Alan McNab (2)
SUE GENERAL 006	1	24	Alison Garnett
SUE GENERAL 007	1	132	Amanda Fletcher
SUE GENERAL 008	1	133	Amanda Thompson
SUE GENERAL 009	1	140	Anita Shaw
SUE GENERAL 010	1	141	Ann Fairclough
SUE GENERAL 011	1	142	Ann Murray
SUE GENERAL 012	1	145	Anne Gibbons
SUE GENERAL 013	1	148	Anne Thornton
SUE GENERAL 014	1	152	Ball
SUE GENERAL 015	1	154	Barbara Fazakerley
SUE GENERAL 016	1	156	Barbara Stephenson
SUE GENERAL 017	2	160	Bess Smith, Cronton Pathways Walks for Health
		537	Susan Campbell
SUE GENERAL 018	1	161	Bradley Fowell
SUE GENERAL 019	1	162	Brenda Espinola
SUE GENERAL 020	1	165	Brian Corkhill
SUE GENERAL 021	1	169	C Burton
SUE GENERAL 022	1	174	Carole Burns
SUE GENERAL 023	1	178	Charles Alfred Daly
SUE GENERAL 024	1	180	Cheryl Cunningham
SUE GENERAL 025	1	108	Chris Edge, Barton Willmore for Junction Property Ltd
SUE GENERAL 026	1	181	Chris Thompson
SUE GENERAL 027	1	187	Claire Revell
SUE GENERAL 028	1	188	Clare Critchley
SUE GENERAL 029	1	86	Cllr Ian Smith, Liberal Democrats (1)
SUE GENERAL 030	1	86	Cllr Ian Smith, Liberal Democrats (2)
SUE GENERAL 031	1	192	Cynthia James
SUE GENERAL 032	1	193	D Fitzgerald
SUE GENERAL 033	1	194	D J Ball
SUE GENERAL 034	1	32	Daniel Brown
SUE GENERAL 035	1	196	Daniel Christopher Cassells

Reference	Copies Submitted	Submitted by:	
		Representor ID	Name
SUE GENERAL 036	1	198	Daniel Wilson, Prescot Town Council
SUE GENERAL 037	1	199	Darren Seddon
SUE GENERAL 038	1	200	Dave Sephton
SUE GENERAL 039	1	201	David Ashworth
SUE GENERAL 040	1	204	David Dickinson, Highways Agency
SUE GENERAL 041	2	205	David Holmes (2)
		454	Patricia McDonald-Holmes (6)
SUE GENERAL 042	2	205	David Holmes (7)
		454	Patricia McDonald Holmes (7)
SUE GENERAL 043	1	28	David Kent
SUE GENERAL 044	1	206	David Kernick
SUE GENERAL 045	1	112	Debbie King (2)
SUE GENERAL 046	1	210	Debbie Lewis (1)
SUE GENERAL 047	1	210	Debbie Lewis (2)
SUE GENERAL 048	1	215	Dennis Jones
SUE GENERAL 049	1	217	Derek Muirhead
SUE GENERAL 050	1	43	Donald McCormack
SUE GENERAL 051	1	218	Doreen Wallington
SUE GENERAL 052	1	220	Dorothy Daw
SUE GENERAL 053	1	221	Dorothy Wood
SUE GENERAL 054	1	222	Douglas Thurgeston
SUE GENERAL 055	1	224	Edward Judge
SUE GENERAL 056	1	226	Eileen Morris
SUE GENERAL 057	1	227	Elaine Hanley
SUE GENERAL 058	1	230	Elaine Rowe
SUE GENERAL 059	1	231	Elaine Sheridan
SUE GENERAL 060	1	232	Elesta Muirhead
SUE GENERAL 061	1	235	Ellen Holden
SUE GENERAL 062	1	242	Eric Binks
SUE GENERAL 063	1	243	Eric Stephenson
SUE GENERAL 064	1	244	Frances Douras
SUE GENERAL 065	1	245	Frances Parry
SUE GENERAL 066	1	246	Francis Moore
SUE GENERAL 067	1	79	Gary Berry
SUE GENERAL 068	6	247	Gary Davis
		279	Irene Davis (1)
		442	Nicola Davis
		96	Ray Davis (3)
		544	Sylvia Jones
		548	Thomas Jones
SUE GENERAL 069	1	251	George Howarth MP
SUE GENERAL 070	1	253	George Rowe
SUE GENERAL 071	1	256	Gillian Pinder, Rainhill Parish

Reference	Copies Submitted	Submitted by:	
		Representor ID	Name
			Council
SUE GENERAL 072	1	258	Gina O'Dowd
SUE GENERAL 073	1	259	Gladys Webster
SUE GENERAL 074	1	70	Graham Moorcroft (1)
SUE GENERAL 075	2	70	Graham Moorcroft (2)
		70	Graham Moorcroft (3)
SUE GENERAL 076	1	65	H Pye
SUE GENERAL 077	1	267	Helen O'Dowd
SUE GENERAL 078	1	269	Hill
SUE GENERAL 079	1	270	Holford Holden
SUE GENERAL 080	1	279	Irene Davis (2)
SUE GENERAL 081	1	279	Irene Davis (3)
SUE GENERAL 082	1	84	JM Carter, Rainhill Civic Society
SUE GENERAL 083	1	290	Jacqueline Lunt
SUE GENERAL 084	1	292	James O'Rourke
SUE GENERAL 085	1	293	James R Ormond
SUE GENERAL 086	1	295	Jane Aspinall, Bellway Homes
SUE GENERAL 087	1	297	Janet Crehan
SUE GENERAL 088	1	62	Janet Gore
SUE GENERAL 089	1	299	Janet Rourke
SUE GENERAL 090	1	18	Jason Brown
SUE GENERAL 091	1	304	Jean Phillips
SUE GENERAL 092	1	305	Jean Quinn (1)
SUE GENERAL 093	1	306	Jean Rush
SUE GENERAL 094	1	308	Jeanette Sephton
SUE GENERAL 095	1	310	Jeannette Hankin
SUE GENERAL 096	1	313	Jennifer Le Poidevin
SUE GENERAL 097	1	314	Jennifer Mullin
SUE GENERAL 098	1	113	Jenny Hope, United Utilities
SUE GENERAL 099	1	317	Joan Fitzgerald
SUE GENERAL 100	1	322	Joanne Saunderson
SUE GENERAL 101	1	323	Johanna Robinson
SUE GENERAL 102	1	325	John Hindley
SUE GENERAL 103	1	327	John Jones
SUE GENERAL 104	1	332	John Small
SUE GENERAL 105	1	334	John Webster (Senior)
SUE GENERAL 106	1	338	Joseph Todd
SUE GENERAL 107	1	341	Julie Anne Parker (1)
SUE GENERAL 108	1	343	June Anders
SUE GENERAL 109	1	346	Karen Easton
SUE GENERAL 110	1	59	Karen Tomlinson
SUE GENERAL 111	1	351	Katy Andrews
SUE GENERAL 112	1	353	Keith Daw
SUE GENERAL 113	1	354	Keith Easton

Reference	Copies Submitted	Submitted by:	
		Representor ID	Name
SUE GENERAL 114	3	355	Keith Kennedy
		437	Nattalie Kennedy
		447	Oliver Kennedy
SUE GENERAL 115	1	357	Keith Sharp
SUE GENERAL 116	1	358	Keith Swan
SUE GENERAL 117	1	359	Keith Wooding
SUE GENERAL 118	1	363	Kirsty Easton
SUE GENERAL 119	4	364	Kirsty Meredith
		444	Nicola Meredith
		468	Paula Meredith
		94	T W Bretherton
SUE GENERAL 120	1	368	Laura Furlong
SUE GENERAL 121	1	370	Lee Stephenson
SUE GENERAL 122	1	372	Leonard Tran
SUE GENERAL 123	1	376	Linda O'Connor
SUE GENERAL 124	1	378	Lisa Swinden
SUE GENERAL 125	1	382	Lynn Warbrick
SUE GENERAL 126	1	384	M Battle
SUE GENERAL 127	1	386	M E Wortley
SUE GENERAL 128	1	393	Malika Pachi
SUE GENERAL 129	1	399	Margaret Jerabek
SUE GENERAL 130	1	403	Marie Ormond
SUE GENERAL 131	1	404	Marie Rimmer CBE
SUE GENERAL 132	1	407	Mark Inman
SUE GENERAL 133	1	408	Mark Jones
SUE GENERAL 134	1	412	Martin Parker (2)
SUE GENERAL 135	1	416	Maureen Inman
SUE GENERAL 136	1	63	Maurice Brown
SUE GENERAL 137	1	27	Maurice Steele
SUE GENERAL 138	1	421	Michael Gittens (4)
SUE GENERAL 139	1	422	Michael Humphreys
SUE GENERAL 140	1	425	Michael Reid
SUE GENERAL 141	1	426	Michelle Inman
SUE GENERAL 142	1	427	Mike Collier, Wildlife Trust
SUE GENERAL 143	1	433	Myra Hankey
SUE GENERAL 144	1	437	Nattalie Kennedy (1)
SUE GENERAL 145	1	441	Nicholas Davison
SUE GENERAL 146	1	46	Nicola Boyle
SUE GENERAL 147	1	443	Nicola Hitchen
SUE GENERAL 148	1	446	Norman Feely
SUE GENERAL 149	1	47	Patricia Brackley
SUE GENERAL 150	1	454	Patricia McDonald-Holmes (5)
SUE GENERAL 151	1	456	Patrick O'Rourke A
SUE GENERAL 152	1	461	Paul Marshall
SUE GENERAL 153	2	5	Paul Slater (1)

Reference	Copies Submitted	Submitted by:	
		Representor ID	Name
		5	Paul Slater (2)
SUE GENERAL 154	1	465	Paul Woods
SUE GENERAL 155	1	473	Pauline Jones
SUE GENERAL 156	1	21 and 80	Peter Monaghan (1)
SUE GENERAL 157	1	481	Philip Jennings
SUE GENERAL 158	1	482	Philip Jones
SUE GENERAL 159	1	483	Philip Williamson
SUE GENERAL 160	1	486	R Martin
SUE GENERAL 161	1	487	R McCauley, St.Helens Council
SUE GENERAL 162	1	88	Rachael Bust, The Coal Authority
SUE GENERAL 163	2	96	Ray Davis (1)
		96	Ray Davis (4)
SUE GENERAL 164	1	96	Ray Davis (2)
SUE GENERAL 165	1	96	Ray Davis (5)
SUE GENERAL 166	1	491	Ray Gough
SUE GENERAL 167	1	42	Robert Fairclough
SUE GENERAL 168	1	99	Romilly Scragg
SUE GENERAL 169	1	501	Ronald Prescott
SUE GENERAL 170	1	503	Roy Easton
SUE GENERAL 171	1	504	Roy Hardman
SUE GENERAL 172	1	505	Roy Turell
SUE GENERAL 173	1	507	S B Allport
SUE GENERAL 174	1	512	Sandra Cassidy
SUE GENERAL 175	1	515	Sarah Carr
SUE GENERAL 176	1	516	Sarah Hindley
SUE GENERAL 177	2	517	Sarah-Jane Jarman
		554	Trevor Jarman
SUE GENERAL 178	1	518	Scott Cunningham
SUE GENERAL 179	1	79	Sheila Berry
SUE GENERAL 180	1	119	Sian Butt, Pegasus for Taylor Wimpey
SUE GENERAL 181	1	542	Suzanne Lewis
SUE GENERAL 182	1	545	T E O'Conner
SUE GENERAL 183	1	120	Tony Docherty, Weston House
SUE GENERAL 184	1	553	Tracy Vickers
SUE GENERAL 185	1	7	Vitti Osbourne, Cronton Parish Council
SUE GENERAL 186	1	568	Yvonne Owens
Total	<b>204</b>		

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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

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

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	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. CS08c

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 CS08c  
M168 M161 M157

RE. GREEN BELT SITES A57/A58/KNOWSLEY PARK LANE, LAND TO THE REAR OF BEESLEY AND FIELDS SITE. FARMLAND BETWEEN KNOWSLEY LANE (BS194) 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  
A57 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. LARKING, 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

[Redacted Signature]

Date

12-11-14

# HELP SAVE OUR GREEN BELT

All the land between the Clock Face pub, A57 and A58 Prescott 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, Prescott.

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

Alternatively object directly to: Local Plan Team, Knowsley Council, 1<sup>st</sup> Floor Annexe, Municipal Buildings, Archway Road, Liverpool L36 9YU (**Note deadline 14<sup>th</sup> 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](http://www.knowsley.gov.uk/localplan)

JOHN BENNETT

MAUREEN STEWART

PETER RAYNOR

LINDA RAYNOR

Christine Dallon

Michael Dallon

Sara Ferriman

HARRY RUSH

MARIE RUSH

James Rush

COLIN McNALLY

JANET McNALLY

MARTIN LAVELLE

BRENDA LAVELLE

Nicola Lavelle

Andrew Lavelle

Kyle Mogan

~~KEN MORGAN~~

JOHN CRAWFORD

Margaret Mowat

Rachael King

Gary King

Daniel King

Shelia Pytheck

E. Ridley

cat,

AGRAVE

Mrs Cuthbert

N W

K. HYLAND

L. ROBINSON

P. Mc Carron

B. Carr

G. Carr

R. McCarron

A. McCarron

Smeaton

H. McCarron

P. McCarron

A. McCARRON

P. White

K. Pat

SO Bin

For bin

A. Carr

Dei

SADE

D. Johns

~~Cover~~

~~Dave~~

~~Law~~

7.8.

AMCleaf

an seen

y Hoover

LITL

Emma Tuton

W. MORSON

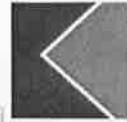
K. MORSON

A. SHARLOCK

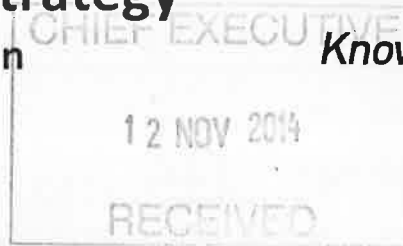
# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council



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

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
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.*

**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 WHISTON GREEN B&WT.

### 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) outlining 'None of the options for land to the 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 means 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.

Genia Puklo recently has made assessments to  
planners regarding M10 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

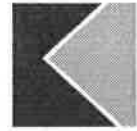
**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

[Redacted Signature]

Date

1/1/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

06 NOV 2014

RECEIVED

### RETURNING THIS FORM

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

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Please 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 A. Reid	
Name		
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)

b) Sound? (see guidance note 2.3)

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

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

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

I AM NOT VERY HAPPY WITH IDEN  
OF PUNISHING OUR SAVED BEST LAND  
WHY DO WE HAVE TO USE OUR  
SAVED BEST LAND, THERE ARE  
PLenty OF WASTE LAND.

P.S. LOCAL HOSPITALS, SOCIAL SERVICES ETC  
ARE UNABLE TO COPE 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 5-11-14

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



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

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

#### PART A – PERSONAL DETAILS

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

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

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

Continue on a separate sheet if necessary...

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

Continue on a separate sheet if necessary...

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

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

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

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Signature

[Redacted Signature]

Date

11.11.14



Mrs. A. S. Davies.

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



11.11.14.

Dear Sirs,

Re: KNOWSLEY LOCAL PLAN - PUBLIC  
CONSULTATION.

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

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

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



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

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

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

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

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

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

- Green Belt.

To check unrestricted urban sprawl of large built up areas

To prevent neighbouring towns from merging into one another.

To assist in safeguarding the countryside from encroachment

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

Yours faithfully,



A. S. DAVIES .

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

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

Dear Sirs,

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

Yours faithfully,

Alan McNab  


# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



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#### PLEASE 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	[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

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)

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. 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**

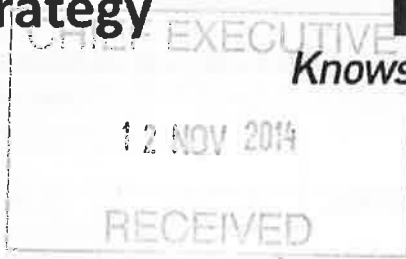
13th November 2014

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



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

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

**PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MISS	
Name	ALISON GARNETT.	
Job Title (if appropriate)	TEACHER.	
Organisation (if appropriate)	HALLWOOD ACADEMY.	
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.**

*This development will have a negative impact on the Whiston area. It will have a detrimental effect on the local amenities and local services.  
Not only will there be loss of of arable land and farm jobs there will be an increase of people looking for employment that just is not in the Whiston area.  
Roads are already over congested within the Whiston 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.

You need to reconsider the destruction of Whiston as it now stands. Whiston was the largest rural area once. Our green belt has been eroded over the years. It is now time to say 'enough is enough'. Leave it for future generations to enjoy and work the land.

Continue on a separate sheet if necessary...

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

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

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

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Signature

[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	MISS	
Name	AMANDA FLETCHER	
Job Title (if appropriate)	BUSINESS MANAGER	
Organisation (if appropriate)	LOCAL AUTHORITY	
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

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 Vassible 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 emissions 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.

Enk 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 blanket within boundary.

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 participating in any further public hearings, this confirmation will be used to provide evidence to determine whether there is a need for any further hearings to the Core Strategy.

Signature

Date

1.11.14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

CHIEF EXECUTIVE

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	AMANDA THOMPSON	
Job Title (if appropriate)	MANAGER	
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

K9B514

Policy Ref

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.

A object to this statement because release of the Green Belt in South Whiston contradicts the purpose of having a Green Belt.  
As this is the last area of Green Belt within South Whiston area the residents will no longer have access to the natural environment and all the green areas in Whiston.

Continue on a separate sheet if necessary...

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

The government have already stated that the release of green belt should be a last resort. There are brown fields available that could be used before releasing the green field and denying our children and the future of Whiston their natural habitat.

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 hearing in relation of the Core Strategy.

Signature



Date 1.11.14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

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Please 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	ANITA SHAW	
Job Title (if appropriate)	STAFF NURSE	
Organisation (if appropriate)	MERSEY-CARE	
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)**

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

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

I believe 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.

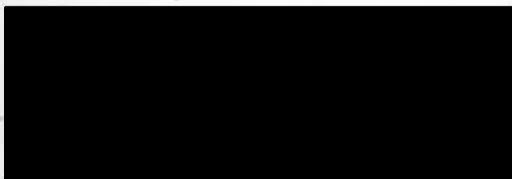
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a) No, I do not want to participate at any further public hearing

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

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Signature

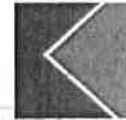


Date

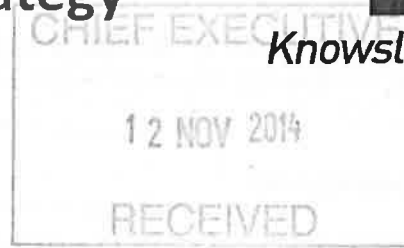
1/11/14

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



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

#### PART A – PERSONAL DETAILS

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

- |   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input 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 Do NOT WISH TO LOOSE THE GREEN BELT LANE BECAUSE WILD LIFE WUD SUFFER, WE DONT NEED ANY MORE HOUSEING DUE TO IMPACT ON 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.

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

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

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

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

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**Signature**

**Date**



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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	ANN	
Job Title (if appropriate)	RETIARD	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

*Mrs Ann Murray*

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

Modification Ref

*WHISTON*

Policy Ref

*1 < G B 5*

Paragraph Ref

*02/15/10*

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

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

*as a pensioner I am concerned about the amount of traffic that these houses will create where are the doctors schools and hospitals you have to wait for an appointment as it is at the moment*

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 know people need houses but why is the council need to use Green Belt land as it that it is too expensive for them to demolish Brown sites or use this government too to spend the money up North

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 17/11/2014

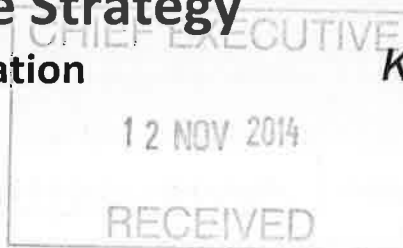
# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council



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

#### **PART A – PERSONAL DETAILS**

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

SAVE WHISTON GREEN BELT

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

Modification Ref

Policy Ref

KG-BS 14

Paragraph Ref

EE 1

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

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <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 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.

OUS 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 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	Anne Thornton	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

M168

Policy Ref

SUE1 &  
SUE2C

Paragraph Ref

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

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

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

I do not believe the proposed modification is legally 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

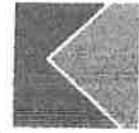
b) Yes, I wish to participate at any further public hearing

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

**Signature**



**Date** 11th November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

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Knowsley Council

12 NOV 2014

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

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	BALL	
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.

THE WILD LIFE WILL SUFFER.  
MY HEALTH WILL ALSO SUFFER AS I HAVE C.O.P.D  
MY WIFE IS ALSO SERIOUSLY ILL.  
I ALSO HAVE CANCER.

---

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 PROSED DISILUTION OF GREEN BILT LAW. IT TOOK A LONG TIME TO ~~LEGISLATE~~ LEGISLATE FOR GREEN BILT IN THE FIRST PLACE.  
I BELIEVE THAT IF ANY BUILDING GOES AHEAD THE HEALTH OF THE COMMUNITY WILL SUFFER

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.

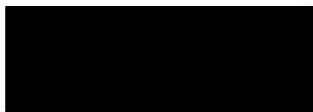
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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



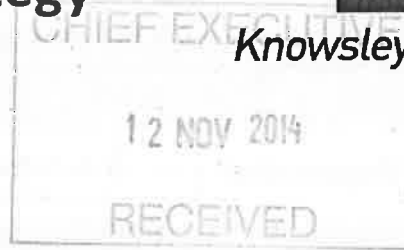
Date 15<sup>TH</sup> NOVEMBER 2014

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	BARBARA FAZAKERLEY	
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

BARBARA FAZAKERLEY

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

Modification Ref

Policy Ref

K9BS14

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)

b) Sound? (see guidance note 2.3)

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

I object because  
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

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Signature



Date

1/11/2014

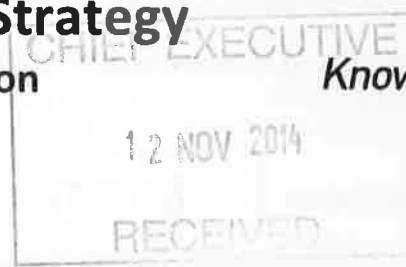
# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council



#### RETURNING THIS FORM

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

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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 STEPHENSON	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

B. STEPHENSON

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

Modification Ref

Policy Ref

KGBS 14

Paragraph Ref

EC3

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

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.**

Current Whiston Village area and surrounding independent stores are underused due to present shopping centre outlet. If another outlet area was created other local stores would be forced to close & lead to disused buildings and unemployment for local people with the result of Whiston Village employment opportunities for best population of South Whiston are overestimated as all jobs have to go out to tender, therefore any contractor from around the D.K. may win a contract & readily to various building development firms coming in rather than using local trades people/companies/individuals as stated. Document by BSIL SA Objective EC3.

The number of times that words like my, prospective & possible occur in the Core Strategy plan in the context of future employment opportunities they promote is staggering in other words all talk of future jobs with an oppositional context with no firm plan and certainly not quantifiable any with headlines. So it's want to build houses but the new jobs will happen - someone somewhere. This is not creating an eye for eye. Some of the knowledge council wants to "promote" households with

Continue on a separate sheet if necessary

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

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

*Continue on a separate sheet if necessary*

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Signature

[Redacted Signature]

Date



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	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.

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

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Signature

████████████████████

Date 12.11.2014

[REDACTED]

---

**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

CHIEF EXEC

Knowsley Council

14 NOV 2014

RECEIVED

### RETURNING THIS FORM

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

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	BRENDA ESPINOLA	
Job Title (if appropriate)	N/A	
Organisation (if appropriate)	—	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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 <sup>change</sup> 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 planners 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.

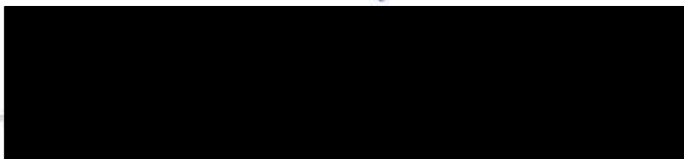
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a) No, I do not want to participate at any further public hearing

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

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Signature



Date

Nov 1, 2014.



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

CHIEF EXECUTIVE  
14 NOV 2014  
RECEIVED

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

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr.	
Name	Brian Corkill	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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**PART B – YOUR REPRESENTATIONS**

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

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

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

Modification Ref	<b>CS 5 SUE 1 SUE 2 / 2a</b>	Policy Ref	<b>Mo 78 M168 M272</b>	Paragraph Ref	<b>Page 14 Map 8 1&amp;2</b>
------------------	--------------------------------------	------------	--------------------------------	---------------	--------------------------------------

**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...*

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Signature

Date 13<sup>th</sup> 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, Prescot, 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.**

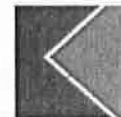
**The road network is restricted by the two motorways, M57 and M62), and already fails to cope at certain times of the day. Another five hundred cars can not be absorbed into the main road network in Whiston.**

**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.**



# 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		
Name	C BURTON	
Job Title (if appropriate)	[REDACTED]	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

SUE

Policy Ref

K9BS 14

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.

There will be too much congestion at windy Arthur Road there are not enough amenities or health care facilities to cope with an increased volume of people and 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.

Eric Pickles MP stated that he was not going to touch the greenbelt land it should be left.

Continue on a separate sheet if necessary...

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

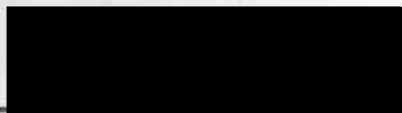
5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

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

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

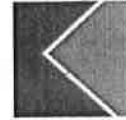
**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

1 | 11 | 14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



### RETURNING THIS FORM

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

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

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

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	Carole Burns	
Job Title (if appropriate)	Senior Residential Executive	
Organisation (if appropriate)	Solicitors	
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 Carole Burns

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

Modification Ref SUEZC Policy Ref KGBS 14 Paragraph Ref FR

**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.**

① Current infrastructure cannot support further development. Train service is in a dire state i.e. no trains at peak times for working people to Liverpool.  
② <sup>motorway</sup> Roundabout ~~and~~ and windy Arbor Road cannot support any further increase in traffic, many many times it is gridlocked causing havoc to commuters and emergency services.  
③ 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.

Continue on a separate sheet if necessary...

*See attached page*

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.

→ Impact on human activity upon the remaining area of Green belt. after development will have a detrimental effect upon quality of natural habitats and local species. Increase in human population near the remaining greenbelt will further degrade the natural environment as a result of vandalism and overall human impact.

→ without the green belt the youth or children would have nowhere to go fishing, hunting with their dogs which would impact on crime in the area.

→ People use the greenbelt to walk - no greenbelt now walking - adverse affect on health.

Continue on a separate sheet if necessary...

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

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Signature

Date

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

Do not use  
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)

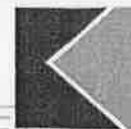
- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**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

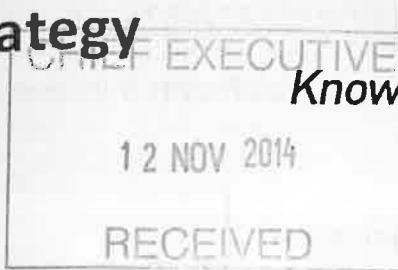
Date





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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

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

### PART A – PERSONAL DETAILS

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

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

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

Continue on a separate sheet if necessary...

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

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

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

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

ASK KNOWSEY TO DO A GEOLOGICAL SURVEY AS MOST OF THE PROPOSED LAND IS HONEYCOMBED WITH OLD MINE WORKINGS. THIS WAS THE REASON CRANTON 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.

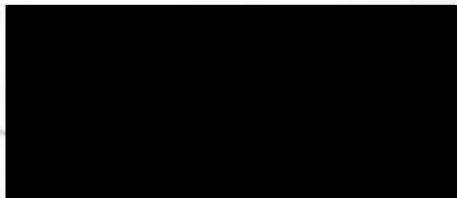
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

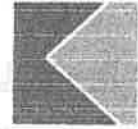
b) Yes, I wish to participate at any further public hearing

**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 1-11-2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

RECEIVED

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

### PART A – PERSONAL DETAILS

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

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

KGB 14

Policy Ref

EC1

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 mortar in our neighborhood and not beautiful green trees, wild flowers, wild life and bees and the beautiful green fields we have.

Our local character will be lost for ever.

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

Continue on a separate sheet if necessary...

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

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

Continue on a separate sheet if necessary...

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

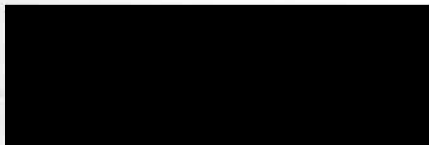
5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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Signature



Date

1.11.14



**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:

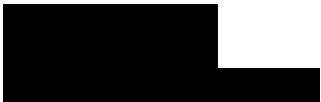
1. Representations to the Knowsley Local Plan: Core Strategy: Proposed Modifications - Consultation (representations form, representations report and Counsels Opinion - 3 pdf files); and
2. A Representations Form in respect of the South of Whiston (residential) and Land South of M62 (employment and Country 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



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Find more information on our stand and seminar [here](#)

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# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



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

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title		
Name		Michael Courcier
Job Title (if appropriate)		
Organisation (if appropriate)	Junction Property Ltd	Barton Willmore
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

Junction Property Ltd

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

Modification Ref

See  
attached

Policy Ref

Paragraph Ref

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

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

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

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

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

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

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

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

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

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

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

**Signature**

**Date**

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

ADVICE

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

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

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

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

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

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

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

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

---

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

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

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

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

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

18. I accept that SPDs can be used to prescribe further detail to a policy set out in the DPD<sup>2</sup>, but the vagueness of part 3 of SUE2 means that it cannot be said that SUE2 prescribes the policy requirements at a general level and the SPD would only set out further detail. I think the wording of SUE2 opens the risk that an SPD might contain new statements of policy, not foreshadowed in the Core Strategy and which would not be tested by any examination of their soundness.

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

MARTIN CARTER  
20<sup>th</sup> October 2014.

Kings Chambers  
Manchester – Leeds – Birmingham.

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



RE: THE KNOWSLEY CORE  
STRATEGY AND POLICY SUE2

ADVICE

Michael Courcier MRTPI



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

**1 Supporting Representations**

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

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

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

MO55            Acceptance of the Sedgefield method to calculate the five year housing requirement as part of Policy CS3 and its accompanying text (also MO56A, MO56B, MO65).

MO59            Setting out the circumstances which would trigger a review of Policy CS3. (However JPL considers that this should be a Main Modification because of its importance to the soundness of the Plan rather than a minor modification as currently suggested).

MO76	Inclusion of the reference to very special circumstances as part of Policy CS5.
MO78	Removal of the Sustainable Urban Extensions from the Green Belt as part of Policy CS5.
M112	Confirmation that measures to mitigate carbon emissions and improve air quality will only be sought " <i>where appropriate</i> ".
M157	Confirmation that the release of the Sustainable Urban Extensions will no longer be delayed until the longer-term.

## **2 Representations Objecting to Specific Proposed Modifications**

### **2.1 M168: New Chapter 6A on Sustainable Urban Extensions**

2.1.1 JPL welcomes most of the principles set out in Policies SUE1 to SUE2c. In particular it supports the following:

- the immediate release of the sustainable urban extensions to meet identified development needs;
- the development of the South of Whiston site for between 1500 and 1800 dwellings (depending on whether of the Council owned land currently identified for a cemetery extension is included in the development area);
- the development of the land South of the M62 for employment development; and
- proposals must demonstrate a comprehensive approach to site development and infrastructure provision, including the matters set out in paragraph 6A.18.

- 2.1.2 JPL however **OBJECTS** to the third part of Policy SUE2 where it says that the masterplan required under the policy to accompany any planning applications for the site should “*accord*” with development plan policy “*and any associated Supplementary Planning Document.*” There is of course no objection to the principle that the masterplan should accord with development plan policy. However the development plan should not impose a requirement that the masterplan for a site must “*accord with*” the proposed Supplementary Planning Document. Such a requirement would effectively incorporate the supplementary planning document into the development plan policy as lack of accordance with it would create conflict with Policy SUE2 itself. This is wholly inappropriate because supplementary planning documents are not subject to the same rigorous statutory procedures and testing as development plan policies.
- 2.1.3 Development plan policies only receive the status accorded to them under Section 38(6) of the 2004 Act after they have been independently tested and examined, and found to meet the tests of soundness set out in national policy. They are also subject to very exacting and lengthy procedures for stakeholder and public involvement and consultation. In contrast, supplementary planning documents are not the subject of any independent examination or testing against the tests of soundness. Moreover they are not required to undergo the same rigorous requirements for stakeholder and public involvement and consultation. Because of these differences, planning law gives development plan policy and supplementary planning documents very different statuses in decision-making
- 2.1.4 Section 38(6) of the 2004 Act requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Under this section of the Act, a supplementary planning document has only the status of a material consideration to which regard should be given. It is not development plan policy where there is an expectation

of accordance unless material considerations indicate otherwise. As such, a proposal which accords with the development plan but is not in accordance with a supplementary planning document would still receive the presumption in favour under Section 38(6). The proposed modification seeks to reverse this position established by statute. The same would apply to the national policy position, and in particular the presumption in favour of sustainable development under paragraphs 14, 196 and 197 of the NPPF.

2.1.5 The proposed supplementary planning documents for the sustainable urban extensions have not, of course, been prepared yet. As such, it is not known what matters they will cover or whether their policies and proposals will be consistent with national policy and guidance, especially in respect of viability which is so important to the delivery of the Core Strategy as a whole. In such circumstances, it is wholly inappropriate for Policy SUE2 to require planning decisions to accord with them. We note in this respect that the Council has suggested other proposed modifications that remove any requirement for proposals to accord with supplementary planning documents. A similar change should be made here.

2.1.6 To assist the Inspector, we attach Counsel's Written Opinion which confirms that the provisions of Policy SUE2 so far as they relate to the proposed Supplementary Planning Documents would be potentially unlawful and may be capable of successful challenge in the Courts.

2.1.7 For these reasons we consider that the proposed modification in this respect fails the tests of soundness and would be potentially unlawful.

## **2.2 M169 and M190: Policy CS 15 on Affordable Housing**

2.2.1 The proposed modifications make a distinction between the levels of affordable housing required on sites within the current urban area (10%) and on Sustainable Urban Extensions (25%). Proposed Modification 190 says that this distinction is

because the Knowsley Economic Viability Assessment (EVA) “*suggests*” there is a generally higher level of development viability in the proposed Sustainable Urban Extensions than in the existing urban areas.

2.2.2 JPL considers that the proposed policy requirement for sustainable urban extensions has not been properly justified by viability evidence. As such, it does not accord with national policy.

2.2.3 The National Planning Policy Framework (NPPF) states (paragraph 173) that pursuing sustainable development requires “*careful attention*” to viability and costs in plan-making. It emphasises that plans must be deliverable and to achieve this, “*the (allocated) sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.*” The Framework adds that to ensure viability, the costs of any requirements likely to be applied to development “*such as requirements for affordable housing, standards, infrastructure contributions or other requirements*” should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing developer to enable the development to be deliverable.

2.2.4 The Knowsley EVA fails to undertake the type of exercise required by national policy to justify an affordable housing target. The tables at pages 186 to 188 only examine the impacts of individual policy requirements, and no conclusions are reached about the cumulative impact of the policy requirements. Nonetheless, if the impacts of individual policies in Tables 7.30 to 7.32 are added together, it is clear that a 25% affordable housing requirement would not be viable on most large housing sites currently in the Green Belt (equivalent to the sustainable urban extensions) at the likely density of 30 dwellings per hectare. In this regard the Core Strategy does not propose developing the sustainable urban extensions at the

unrealistically high density of 40 dwellings per hectare which is the alternative figure given in the tables.

2.2.5 The EVA does contain a "*case study*" at pages 190 to 191 which purports to undertake a cumulative impact assessment of a large housing site in the Green Belt. However this case study is totally unreliable as a guide to policy-making because:

1. The case study takes no account of the introduction of zero carbon homes in 2016 which will significantly increase construction costs. This is clear from Table 7.33 because it is based on baseline viability which the EVA says excludes zero carbon homes. Instead zero carbon homes is treated by the EVA as an additional policy requirement. This is confirmed by Tables 7.30 to 7.32 (pages 186 to 188) which show additional costs under the Code Level heading. For clarification, zero carbon homes roughly equates to Code Levels 5/6, even after the most recent announcements by the Government. If Zero Carbon Homes is factored into Table 7.33, the proposed development would be unviable. In this regard, none of the larger sustainable urban extensions are likely to begin significant housing construction before 2016.
2. The case study does not make an adequate allowance for likely infrastructure costs. The baseline viability includes an allowance of £7500 per dwelling (Table 7.1, page 127). In addition, Table 7.33 includes a further £590.02 per dwelling for additional infrastructure required by the case study proposal (health centre/primary school/SUDS). Together, it makes a total infrastructure cost for the case study of £8090 per dwelling. This figure must be compared with the infrastructure costs set out in the Mott MacDonald report for the South of the Whiston proposal. Table 6.1 of the Mott MacDonald Report shows infrastructure

costs of £15,300,394 for an 1800 dwelling scheme (which includes the Council's proposed cemetery extension land). This is an average of £8500 per dwelling which is well over the EVA figure for infrastructure in the case study. Moreover there will be other very significant infrastructure costs for the South of Whiston proposal which have not been costed by Mott MacDonald, including contributions for public transport improvements, off-site highway works (such as to the Tarbock Island junction), and for new and improved education and community facilities. Appendix F (penultimate page) of the Mott MacDonald Study confirms that these costs have not been included in their estimates. Although no exact figures can yet be given, these further costs are unlikely to be less than £5million given the scale of the South of Whiston proposal, thereby generating a total infrastructure cost of not less than £20,300,000 which is equivalent to over £11,200 per dwelling. As the EVA report shows, such a level of infrastructure costs would not be viable with a requirement for 25% affordable housing. This is highly relevant to the generality of Policy CS15 because, firstly, there is no evidence that South of Whiston is untypical of the other large sustainable urban extensions in this respect; and secondly, the South of Whiston site constitutes such a large proportion of the total capacity coming forward from the sustainable urban extensions. If its development is stalled by unrealistic policy burdens, the policies of the Core Strategy will not be delivered.

- 2.2.6 In conclusion, the clear evidence is that a 25% affordable homes requirement is likely to jeopardise the viability of the Sustainable Urban Extensions, especially the larger sites, such as South of Whiston, where significant infrastructure will be required to bring the sites for development. In these circumstances, the requirement would be contrary to national policy.



2.2.7 For these reasons we consider that the proposed modification in this respect fails the tests of soundness.

### **2.3 MO78, M168 and M272: Former Saunders Garden Centre, Windy Arbor Road, Whiston**

2.3.1 The site of the former Saunders Garden Centre should be excluded from the South of Whiston Sustainable Urban Extension so that it can be brought forward immediately and not await the completion of the masterplanning exercise for the urban extension as currently required by the proposed modifications for Policy SUE2. This masterplanning exercise has not yet begun and there is no timetable yet for it.

2.3.2 The Saunders site is previously developed land. As such it is very different in character from the rest of the developable land within the proposed Sustainable Urban Extension which is predominantly greenfield agricultural land.

2.3.3 The site is a former retail garden centre which closed about 7 years ago. It is in a semi-derelict state and its unkempt appearance detracts from the amenity of the wider area.

2.3.4 The suitability of the site for housing development has been established for many years. As previously developed land, the principle of its redevelopment is in accordance with national and local green belt policy. The site was originally granted planning permission for housing development in 2010. Since then, the site has regularly formed part of the Council's five year supply of deliverable housing land. The site is therefore very different from the remainder of the developable parts of the South of Whiston site where the principle of development is dependent upon being identified by the Core Strategy as part of the sustainable urban extension.

- 2.3.5 The decision of the Council at a late stage to include the garden centre site within the South of Whiston site has important implications for its development because the current draft of Policy SUE2 would prevent it coming forward for housing except as part of a comprehensive proposal for the whole urban extension. This could delay its development for some time as the wider proposal is dependent upon the cooperation of a number of landowners and developers.
- 2.3.6 The inclusion of the garden centre site within the sustainable urban extension ignores the long history of acceptance by the Council that it is suitable for housing development as a standalone scheme. The decision also ignores the amenity and other benefits arising from the early redevelopment of the site, including its contribution to the five year supply and prioritising the use of previously developed land in accordance with national policy and guidance.
- 2.3.7 The Council has given no reasons why the site has been included in the sustainable urban extension when it has previously been treated as a separate site. As the history shows, it is capable of being developed independently. It is also not required to achieve a satisfactory comprehensive development of the wider area. The Council has already agreed the principle of an access to the south off Windy Arbor Road close to the junction with the M62, and to the north off Lickers Lane. There is no obvious reason why another access onto Windy Arbor Road is necessary or desirable.
- 2.3.8 In conclusion, there is no reason why the development of this previously developed site with its benefits for amenity and deliverable housing supply should be delayed until there is an approved masterplan for the whole of the proposed sustainable urban extension. Such a requirement fails key soundness tests of being justified and in accordance with national policy.

2.3.9 For these reasons we consider that the proposed modifications in this respect fail the tests of soundness and would be potentially unlawful

# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

## Representations Form



Knowsley Council



### RETURNING THIS FORM

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

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

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

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

### PART A – PERSONAL DETAILS

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

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

To protect, enhance and manage the local character and accessibility of the landscape and ensure safe access  
knowingly

Continue on a separate sheet if necessary...

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

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

Continue on a separate sheet if necessary...

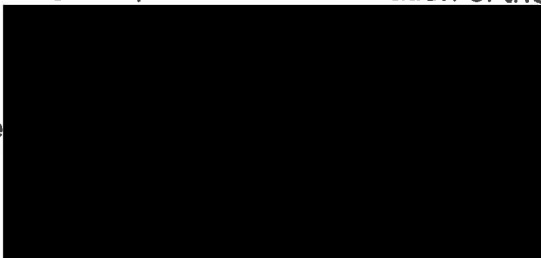
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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

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

**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

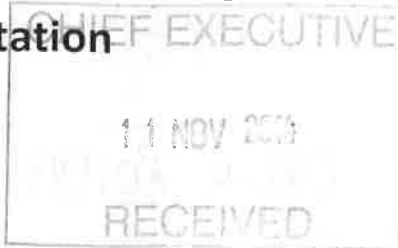


Date 1 Nov 2014



# 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	Miss	
Name	Claire	
Job Title (if appropriate)	Processing Officer	
Organisation (if appropriate)	HMRC	
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

Claire Kerell

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

Modification Ref

KG15 MBS

Policy Ref

55

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.

From studies people are 24% more likely to be physically active if they live near a green open space. (Natural England (2009). Technical Information Note TIN055: An estimate of the economic & health value and cost effectiveness of the expanded WHI scheme 2009).

Children with ADHD can concentrate on schoolwork and similar tasks better than usual after taking part in activities in green settings, such as walking. (The Trust for Public Land (2006) The Health Benefits of Parks).

Continue on a separate sheet if necessary...



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

There is no way to make it legally compliant, as taking the greenbelt away will effect physical activity for residents within the area, dog walkers, runners, children playing football in the local area, and many other local groups, schools and clubs.

The way to make it legally compliant would be to build on the Brown field that covers 75% of the houses needed to fulfil government targets. Fill these first, then lastly consider a small portion of this land if the 25% is still needed in the future?

*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.

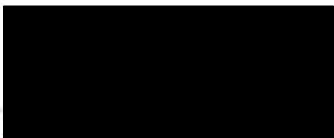
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

2/11/14

[REDACTED]

---

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

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

Mrs Clare

Critchley

[REDACTED]

[REDACTED]

[REDACTED]

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

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

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

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

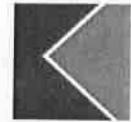
I hope that my objections are clear and my form of representation is acceptable.

Regards

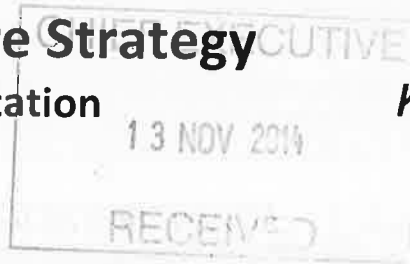
Mrs Clare Critchley

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



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

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

### PART A – PERSONAL DETAILS

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

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

TOWN COUNCILLOR IAN SMITH, PRESCOT

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

Modification Ref  *Spatial Strategy 5 Page 5* Policy Ref  *C5 5* Paragraph Ref  *& SUE 1 to 2C.*

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

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

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

Knowsley Local Plan: Core Strategy - Technical report - Spatial Profile Final version - Core strategy submission document July 2013 Page 65  
Key issues Prescott identifies • Land at Cart Lane, to the west of Prescott (for employment uses) NO MENTION OF HOUSING! as outlined in the modification document. Definitely No community involvement with this change, not Legally compliant or sound!  
The government guidance changed following Eric Pickles announcement prioritising Brown field sites (2014). Remove policies SUE1 - 2C!  
Communication with local residents & community groups has been sadly lacking in 2013 and 2014 calling into question the plan's legality and soundness.  
Both sites in Prescott clearly measure up to the criteria of the National Planning Framework, Knowsley's Spatial Strategy 5 (page 53) 5.40 - the five purposes of including land in the green belt apply to Cart Lane, Prescott and land bound by the A58 known as Whitakers triangle. 'The process by which sites have been chosen is Flawed', comment Continue on a separate sheet if necessary...  
of the Inspector in November 2013

A total revision of Green belt policy is required!

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

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

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

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

The five purposes stated in the National Planning Framework will be adhered to by the authority. Consultation with residents and local groups will be more wide ranging than just informing the minimum amount required by law. We understand that part goes astray and in this case many residents who should have been informed by law were not! Continue on a separate sheet if necessary... Remove policies SUE1 to 2c.

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

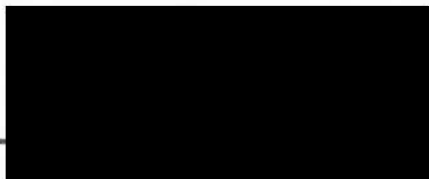
5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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

Signature



Date 11<sup>th</sup> November 2014

To:-

13 NOV 2014

RECEIVED



Knowsley Liberal Democrats

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

11th November 2014

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

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

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

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

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

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

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





**Knowsley Liberal Democrats**

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

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

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

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





Knowsley Liberal Democrats

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

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

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

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

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

The modification document 'slashes' through the constraints



Knowsley Liberal Democrats

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

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

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

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

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

In Prescot this definitely includes our scarce green belt sites!





**Knowsley Liberal Democrats**

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

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



Knowsley Liberal Democrats

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

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

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

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

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

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

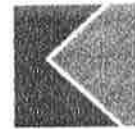


Knowsley Liberal Democrats  
[REDACTED]

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

Yours faithfully,

[REDACTED]  
IAN SMITH - CHAIRMAN  
KNOWSLEY CONSTITUENCY  
LIBERAL DEMOCRATS  
[REDACTED]



# Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



Knowsley Council

## RETURNING THIS FORM

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

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- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

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

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

## PART A – PERSONAL DETAILS

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

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

**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

CYNTHIA JAMES

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

Modification Ref

Mo 55  
to Mo 65

Policy Ref

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

Paragraph Ref

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

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.

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

Continue on a separate sheet if necessary...



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

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

Continue on a separate sheet if necessary...

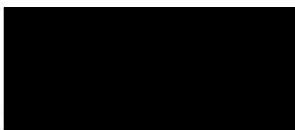
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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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Signature



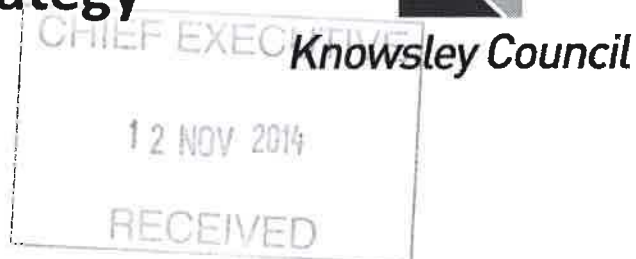
Date 11 / 11 / 2014





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



### RETURNING THIS FORM

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

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

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

### PART A – PERSONAL DETAILS

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

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

BY BUILDING ON THIS GREEN BELT LAND YOU WILL BE HARMING THE LOCAL ENVIRONMENT. ALSO THIS DEVELOPMENT WILL HAVE A HUGE EFFECT ON THE LOCAL WILD LIFE ~~FOR~~ <sup>THERE</sup> WILL ALSO BE A LOT OF EXTRA TRAFFIC COMING IN AND OUT OF THE AREA WE WILL ALSO BE LOSING VALUABLE AGRICULTURE 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.

- 1 THE COUNCIL MUST TAKE GUIDANCE GIVEN FROM ERIC PICKLES MP ON OCT 16TH 2014
- 2 LOOK INTO AND TAKE INTO ACCOUNT THE O.N.S. POPULATION FIGURES FOR 2014
- 3 MUST 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.

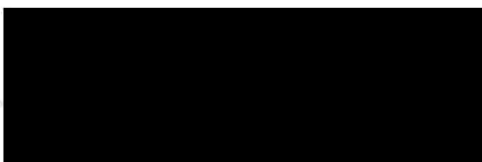
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a) No, I do not want to participate at any further public hearing

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

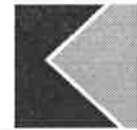
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Signature



Date

1/11/2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

RECEIVED

### RETURNING THIS FORM

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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	D.J. BALL	
Job Title (if appropriate)	RETIRED INSURANCE REP	
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.**

AGAINST THE USE OF GREEN BELT LAND  
AND WORRY ABOUT THE INFRASTRUCTURE  
IE BUSES, SCHOOLS DOCTORS, AND HOSPITAL INFLOW  
WHEN ALREADY OVERWORKED.  
AS ALSO INTERFERENCE WITH [REDACTED]  
WILDLIFE AND POLLUTION OF THE AIR

*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.

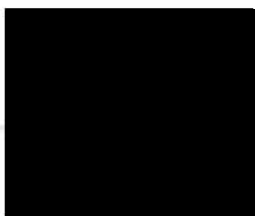
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b) Yes, I wish to participate at any further public hearing

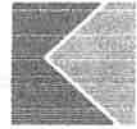
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Date

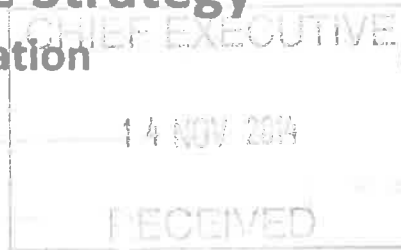
1/1/14



# 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	DANIEL BROWN	
Job Title (if appropriate)	STUDENT	
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 type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness 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 writing to object the the proposed Plan to build houses on our greenbelt land.

It will have a big impact on our local wildlife their homes will be destroyed. There will be an increase in traffic the roads already get congested now if the proposed plan goes ahead it will become even worse. Hospitals, doctors, dentist etc will become harder to make appointments here we already have to wait a week to get one now. People have illnesses and they cannot wait this long if the building goes ahead then we will have to wait even longer.

It is a place were local dog walkers go.

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



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

Heavy traffic will increase, it will be even harder for parents to get their kids into schools.

It will become increasingly harder to get an appointment anywhere.

It will have an impact on local wildlife.

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

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

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you 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 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	DANIEL CHRISTOPHER CASSELLS	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

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

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

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

Continue on a separate sheet if necessary...

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

I DO NOT KNOW SUFFICIENT INFORMATION TO MAKE POSITIVE SUGGESTION.

THE LAST MEETING, WE WERE TOLD SOME QUESTIONS COULD NOT BE ANSWERED BECAUSE, THE TOPICS WILL ONLY BE PURSUED IN STAGES AFTER THE GREEN BELT ISSUE HAS BEEN DEALT WITH. SURELY THE POPULATION WANT TO KNOW ALL ASPECTS TO BE ABLE TO MAKE A DECISION. SURELY THERE IS SUFFICIENT BROWN BELTS SHOULD BE LOOKED AT, WE SHOULD HAVE A REFERENDUM FOR THE AREAS CONCERNED.

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

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

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

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

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

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

Signature



Date

11/11/2014



# 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).

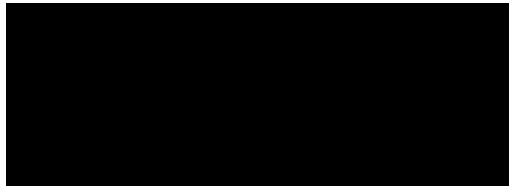
The Town of Prescot has a unique history within Knowsley and residents of Prescot feel very strongly about preserving its identity. The Town Council recognise and welcome this local pride and would therefore be opposed to any plans that would remove the identifiable boundaries of the Town.

### 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 realisation of Green Belt land.

I hope you will consider the points made above.

Yours Sincerely



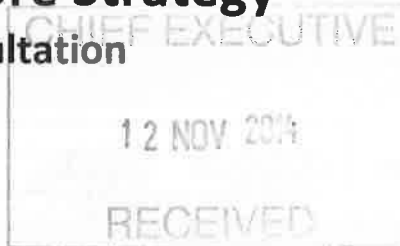
Daniel Wilson  
Town Clerk



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



### RETURNING THIS FORM

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

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

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

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

#### PART A – PERSONAL DETAILS

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

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

**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

OALLEN SEDDON

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

Modification Ref

Policy Ref

KG8S14

Paragraph Ref

EC3

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

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.

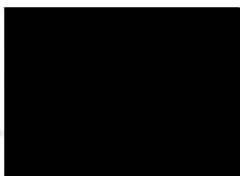
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

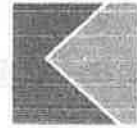
**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

1/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR. <del>XXXXXXXXXX</del>	
Name	<del>XXXXXXXXXX</del> DAVE SEPHTON	
Job Title (if appropriate)	<del>XXXXXXXXXX</del>   DOG WALKER	
Organisation (if appropriate)	<del>XXXXXXXXXX</del> DOGS' TRUST	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

Policy Ref

KGBS14

Paragraph Ref

E1

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

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

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

I OBJECT BECAUSE: -

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

Continue on a separate sheet if necessary...

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

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

Continue on a separate sheet if necessary...

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

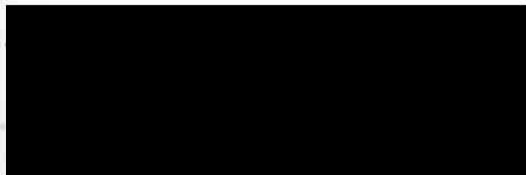
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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Signature



Date

1.11.2014.



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

RECEIVED

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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 ASHWORTH	
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

DAVID ARHWORTHY

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

Modification Ref

Policy Ref

KERS14

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. ALMOST 9 OUT OF 10 PEOPLE USE PARKS AND OPEN GREEN SPACES, AND THEY VALUE THEM. AND IF PEOPLE ARE SATISFIED WITH LOCAL PARKS THEY TEND TO BE SATISFIED WITH THEIR COUNCIL. THE PROVISION OF PARKS AND OPEN SPACES IN DEPRIVED AREAS IS WORSE THAN IN AFFLUENT AREAS. THE HIGHER THE QUALITY OF THE GREEN SPACE, THE MORE LIKELY IT IS TO BE USED. TO BUILD OVER 1500 HOUSES ON THE BEST + MOST VERSATILE GRADE 2 AGRICULTURAL LAND CANNOT ENHANCE GREEN INFRASTRUCTURE. EVERY ONE OF THE OPTIONS WOULD RESULT IN THE LOSS OF LARGE AREA OF OPEN GREEN SPACES.

Continue on a separate sheet if necessary...



are **objecting** to the modification please set out **how** you consider it should be made to make 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 TAKE INTO ACCOUNT HARVEST GUIDANCE.  
FROM MIC PICKLES M.P REGARDING  
GREEN BELT

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

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

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

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

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

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Signature



Date

6-11-14



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

David Dickinson  
 Asset Manager

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

12 November 2014

**For the attention of Local Plan Team**

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

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

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

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

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

#### **Reason for Highways Agency Response**

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

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

Page 1 of 6

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

### Comments on the Sustainable Urban Extensions policies

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

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

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

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

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

*Notes:*  
 Information in Table 4.2 of study report

*Colour Key:*  
 Increase  
 Decrease

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

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

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

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

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

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

*Notes:*  
 Information in Table 4.3 of study report

*Notes:*  
 HA generic rates as follows:

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

*Colour Key:*  
 Increase (Red)  
 Decrease (Green)

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

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

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

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

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

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

**TABLE 3**  
**Highways Agency required revised wording**

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

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

### Comments on other modified policies

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

**TABLE 4**  
**Comments on other modified policies**

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

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

### **Sustainable Urban Extensions Supplementary Planning Documents**

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

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

Yours sincerely



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



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



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

#### PART A – PERSONAL DETAILS

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

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

Highways Agency

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

Modification Ref

M168

Policy Ref

SUE1, 2,  
2a, 2b, 2c

Paragraph Ref

Section 6A

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

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



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

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

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

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

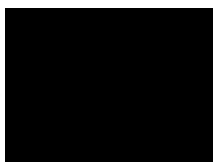
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**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- 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**



David Dickinson

**Date** 12 November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



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

#### PART A – PERSONAL DETAILS

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

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

M055

Policy Ref

SD32, KGBS14

Paragraph Ref

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

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

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

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

For such an important public consultation it seems as if the Council have done the minimum required. Hence the LOCAL PLAN is unsound on the basis of the failure of the Council to carry out adequate consultation with the wider public. In particular the policies outlined Doc CS08c M049-65 Policy Ref CS1-CS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: p51: M168 (Doc CS08c: P51) new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC.

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

**4. If you are objecting to the modification please set out how you consider it should be changed to make 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 met its targets". According to the guidance unmet housing need, including for traveller sites, is unlikely to outweigh the harm to the green belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the green belt. Mr ERIC PICKLES is quoted as stating: "This Government has been very clear that when planning for new buildings, protecting 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 met 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.

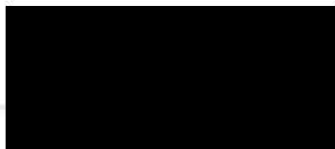
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**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- 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 13 Nov 14



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

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**PART A – PERSONAL DETAILS**

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

KGBS14

Policy Ref

E2

Paragraph Ref

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

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

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

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

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

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

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

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

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

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

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

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

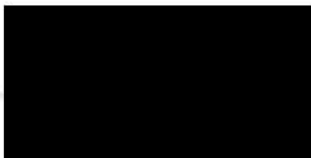
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a) No, I do not want to participate at any further public hearing

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

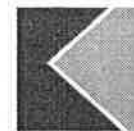
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Signature



Date

13 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	
Name	DAVID KENT	
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

SUE 2A

Policy Ref

K9B514

Paragraph Ref

E3/E5

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

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

Continue on a separate sheet if necessary...

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

STOP BUILDING.

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

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

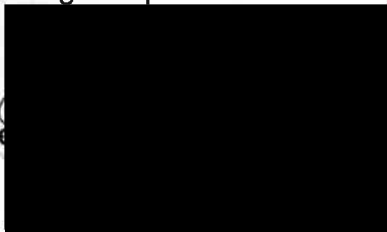
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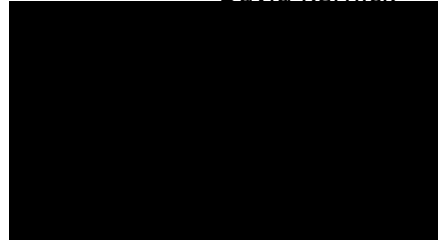
Signature



Date

1/11/14

David Kernick



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

Tuesday 12 November 2014

Dear Knowsley Local Plan Team,

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

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

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

### **INFRASTRUCTURE**

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

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

### **JOBS**

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

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

## **IMPORTANCE OF GREEN SPACE**

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

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

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

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

## **BROWNFIELD**

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

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

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

Yours sincerely,

David Kernick



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

Lodge Riding Centre

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

Modification Ref

M076 to  
M091

Policy Ref

C55

Paragraph Ref

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

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

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

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

C55 talks about Inappropriate Development – surely taking away the Greenbelt to build more houses (a lot more houses than needed if we used brownfield sites) is very inappropriate

Harm to the Greenbelt (NPPF 87/88) is very difficult to quantify especially when you cannot be sure that areas in question will be used?  
Continue on a separate sheet if necessary...

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

Only release Greenbelt <sup>if and</sup> when there are no alternatives.  
It should be as a last resort not just developers taking the easiest cheapest option available.

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

Continue on a separate sheet if necessary...

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

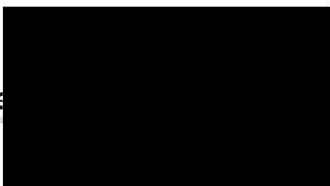
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Signature



Date

12/11/14



**From:** Debbie Lewis [REDACTED]  
**Sent:** 19 October 2014 23:23  
**To:** Knowsley Local Plan  
**Subject:** re: Whiston Greenbelt

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I believe the proposals to concrete over our greenbelt areas will have a detrimental effect on the mental and physical health of Whiston's existing residents.

- \*Less trees filtering the carbon dioxide from the motorway
- \*Less area to walk with our families and pets
- \*More traffic and the dangers that brings
- \*More fumes from said traffic
- \*Less green space to pause, breathe and take time out from the stresses and strains of everyday life
- \*Increased strain on GPs/clinics/local hospitals meaning longer waiting times for appointments

Does Knowsley have any obligation to care for the health of its current residents ? Or do they only see £ signs ?

Government guidelines released recently stated that greenbelt should only be used for development in 'exceptional circumstances' Does the fact that brownfield sites are a little less convenient to build on for developers constitute 'exceptional circumstances' ?

We often here that Whiston/Knowsley is an area of low attainment. After closing Whiston library/ Prescott Swimming Baths/ Prescott Museum/ Prescott Library (Yes I am aware you squeezed some of those into the One Stop Shop) you propose to pack in several thousand new residents. What new community resources will be provided for our area?

Aside from the many practical reasons why this plan is disastrous for local residents, may I add on a personal note that I would be utterly heartbroken to see the beautiful green areas where I played as a child, my father played as a child, where I take my own children to learn about nature and the beauty of it, destroyed.

Deborah Lewis, Whiston resident

**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 fullfil 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

[REDACTED]

---

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

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

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

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

--  
Regs Dennis Jones

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

RECEIVED

### RETURNING THIS FORM

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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	DEREK MUIRHEAD	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

MR. DEREK MUIRHEAD

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

Modification Ref

WHALSTON  
SOUTH

Policy Ref

LGBS 14

Paragraph Ref

E1 - E11  
S1 - S8

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

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

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

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

Continue on a separate sheet if necessary...

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

\* THE USE OF BROWNFIELD SITES WOULD GREATLY IMPROVE <sup>THE</sup> SITE STATE OF OUR LOCALITY, RELEASE VALUABLE LAND FOR PUBLIC USE AND PROTECTION, PROVIDE VALUABLE INCOME AND OPPORTUNITIES FOR NEW BUSINESS DEVELOPMENT.  
\* RESTORING EMPTY AND VERY RUN DOWN PROPERTIES ON STRUCTURALLY SOUND LAND WOULD CONTRIBUTE TO THE WEALTH, HEALTH AND WELLBEING OF RESIDENTS.  
\* CONSULTATION WIDELY TO DETERMINE NEEDS, REQUIREMENTS AND INFORMATION  
*Continue on a separate sheet if necessary...*

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

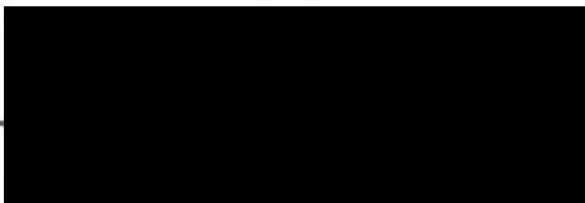
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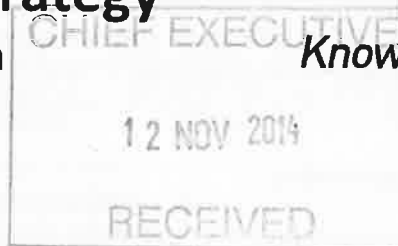
Date 01 - 11 - 14

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



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

#### PART A – PERSONAL DETAILS

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

- |   | 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.**

I BELIEVE PARAGRAPH E1 IS UNSOUND BECAUSE AS A RESIDENT OF Halsnead Park the areas allegedly not to be developed i.e. OLD Wood and Big Water as well as the value of my retirement home and 140 others would be severely affected by any of the proposed development. These features would become isolated and untenable to the residents of Halsnead in particular and Whiston in General.

The majority of residents on Halsnead Park are retirees who moved there for a peaceful and happy retirement. These proposals would be the death knell for many of them and the complete devaluation of their homes.

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



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

The inspector should take note of the comments made by Mr Eric Pickles M.P. regarding his deep concern re not building on any Green belt.  
Also the inspector should convene another public meeting as I was not able to understand the Jargon and technical issues at the first consultation.

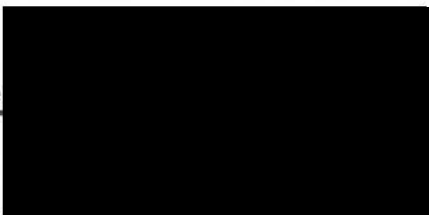
*Continue on a separate sheet if necessary...*

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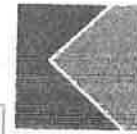
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12 NOV 2014  
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#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	DOREEN WALKINGTON	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	N/A	
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	[REDACTED]	

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Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

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I object to the proposal as it will impact on the area in a fundamental way. Although legally compliant the proposal is unsound. The impact will mean the education system available will be even further comprised than at present. Crime will increase due to the increased number of residents. We do not have health facilities we need at present so will be worse with the influx of more residents. Traffic/pollution will increase affecting the already poor health of the local population. Public transport is not very good in the area & a further influx will be detrimental for people. Finally there are a number of brownfield sites available in Knowsley which should be used before green belt sites, as espoused by Mr Pickles.

*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 proposal to develop Whiston green belt for housing goes against the ideals of green belt land. No thought has been given to the fact that Knowsley is a deprived area from all aspects i.e education, health, ~~and~~ and social. To build more homes would only exacerbate these problems. To say this building executive/low cost homes in the same area will bring economic advantages, is hardly accurate. Anyone buying an executive home does not shop for said home in a deprived area; they want good schools not failing schools, they want good health care facilities not one health centre and they want good leisure facilities which are non-existent in Whiston. As a long term resident of Whiston I **OBJECT** to this proposal to turn Whiston into an urban sprawl with no green spaces/wild life | health & wellbeing. Continue on a separate sheet if necessary...

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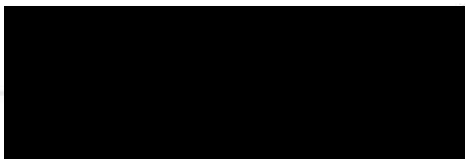
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Date 01/11/2014



Knowsley Council

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

**PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MRS.	
Name	DOROTHY DAW	
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: D. DAW.

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

Modification Ref: MO 78  
M168  
M 272. Policy Ref: CSS  
SUE1 SUE2 Paragraph Ref:

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

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

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

I strongly wish to object to the proposed modifications and in my view believe that the proposals are not legally compliant or sound as there was no positive preparation on the accurate infrastructure on roads, traffic congestion health and safety, schools and GP services. It is not justified as there was no consultation with local residents by letter. It is not in my view effective as it will just cause more overcrowding and hazards and compromise health and safety. My proposal is to use brown belt area first for example - old Bicc site off carr lane, Scotchbarn lane after removing old school and destruction of the swimming baths.

Continue on a separate sheet if necessary...

**CONTINUED\***  
please see attached letter

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

please see attached letter.

my suggestion to the modification would be to consider all aspects of Health and Safety to the residents of the area in particular school children and what the increase in traffic would bring.

To use all brown belt areas first and to consider the views and opinions of all local residents and to write to them first about any proposals to the change and removal of green belt areas.

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

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

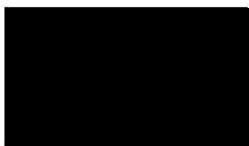
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Signature



Date 10-11-14

MODIFICATION REF M078 M168 M262

I am writing with regard to the proposals for Knowsley Council to remove areas of Greenbelt areas around Prescott Whiston Croxtan Halewood and Kirkby, in the Knowsley Borough.

I appreciate the fact that this is a decision prepared by Government and forced upon Knowsley Council however I do not feel that this is the right decision and the considerations of the residents already in these areas have not been sought.

The actual considerations of the area and the preservation of Greenbelt areas have not been taken into account but merely used for selling off land to build houses for a huge profit to housing developers.

I suggest that Knowsley Council should use all brownfield sites first before even considering to use greenbelt areas.

The infrastructure in this area cannot cope with such a huge increase in houses.

There are no jobs to support the increase in people and public transport and roads, links are already overcrowded and health and safety would be compromised.



00. REF M078 M168 M262

With reference to the proposed area off Prescott by-pass, this road is constantly congested at peak times and accidents are often recorded at the junctions, please check on these statistics so how could any further housing / people / cars be sensible to add to this congestion.

Recently a survey was carried out at the end of Knowsley Park here to change the road / pedestrian structure for the health and safety of the new school - Knowsley Centre for Learning in Prescott. The health and safety of the children in this school would be compromised if more cars, traffic and congestion would be created by added unnecessary houses in this area.

This area is already congested and the building of more houses would produce even more hazards for school children with increasing traffic.

The development will also cause more problems for people trying to register with GP surgeries - Prescott GP are all full and I can never get an appointment when I need it

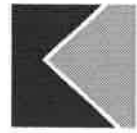
All schools in the area would be over stretched along with local amenities, and hospital services and appointments, as well as the increase in council services too.

In Prescot this is the only remaining patch of greenbelt in the area and it would make sense to built on brownbelt areas first thus preserving the heritage of the area around Knowsley Estate

My main concern is that at no stage have the residents of these areas been consulted about the removal of greenbelt areas and that this has just been a decision made by Government to sell off valuable land for huge profits with no consideration for residents nor the conservation and importance of greenbelt Land.

Loop-holes have been used to pass this decision with little or no appropriate consultations with residents and with no consideration of the impact to the area on the removal of valuable greenbelt land. in my opinion.

Thank you for taking the time to read my concerns, I wish there could be a reversal to these proposals but I expect the Governments decision will be final regardless of any residents views!



# 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	DOROTHY WOOD	
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

DOROTHY WOOD

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

Modification Ref

Policy Ref

KGBS 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)

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.

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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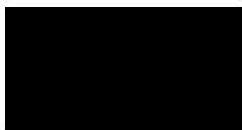
Signature

[Redacted Signature]

Date

1/11/2014

**FRIENDS OF BROWN'S FIELD & SOUTH AVENUE  
RESIDENTS' ASSOCIATION**



12 November 2014



Dear Sir/Madam

Re: Knowsley Local Plan – Public Consultation, Land bounded by A58  
(Whitaker's triangle) and at Carr Lane, Prescot

As Chairman of the Friends of Brown's Field and South Avenue Residents Committee, I am writing, on their behalf, to object to the proposed modifications to Knowsley's Local Plan.

The modifications put forward by Knowsley MBC on our behalf are unacceptable and unsustainable. This is yet another example of Local Government chipping away at our Green Belt land in Prescot through piecemeal erosion, ignoring current planning guidelines which are designed to reinforce the protection of the Green Belt.

The guidance states that when a Council assesses the availability and suitability of land to meet its housing need during Local Plan preparations, it should take account of any constraints such as Green Belt which 'indicate that development should be *restricted* and which may restrain the ability of an Authority to meet its needs'.

Eric Pickles MP, Communities Secretary, stated that 'Local people don't want to lose their countryside to urban sprawl or see the vital green lungs around their towns used for unnecessary development. Today's guidance (2014) will ensure Councils can meet their housing needs by prioritising Brownfield sites and fortifying the Green Belt in their areas'.

The sites at Carr Lane and the land bounded by the A58, Prescot (known as Whitaker's triangle) are both areas of Green Belt which help to provide an essential buffer between the major settlements of Prescot and Huyton. These are established Green Belt boundaries and should *not* be altered.

Knowsley MBC has severely weakened the constraints within the Local Plan protecting Green Belt, for the purpose of its early release for development in 2015. This is totally unacceptable to us and flies in the face of Eric Pickles' announcement.

There are 5,222 new properties that can be built on Brownfield sites. Prioritising Brownfield sites and occupying empty properties within the Borough – of which there are over 2,000 – would practically meet our housing needs and would be an acceptable way forward.

Referring to the National Planning Framework included in Knowsley's Spatial Strategy 5 (page 53) 5.40, the 5 purposes of including land in the Green Belt are:

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

Both sites currently meet the first four criteria set out above.

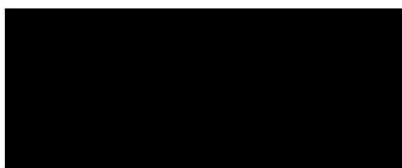
There is widespread public concern and unrest about the modifications to Knowsley's Local Plan regarding the Green Belt.

I and my colleagues would question the soundness of the Plan since there has been a total failure to communicate effectively with Residents and Residents' groups including our own in South Avenue.

Given the new guidance issued earlier this year, we propose that Knowsley Council revisit and review their Local Plan, working with Residents' Groups and local people at every level and in all aspects of the process.

A new Plan should provide a more strategic approach, protecting the Green Belt as this is crucial to the health and wellbeing of present and future generations for both people and wildlife.

Yours faithfully

A large black rectangular redaction box covering the signature of Mr Douglas Thurgeson.

Mr Douglas Thurgeson  
Committee Chair of the Friends of Brown's Field & South Avenue Residents'  
Association

Local Plan Team  
Knowsley MBC  
1<sup>st</sup> Floor Annex  
Municipal Buildings  
Archway Road  
Huyton  
L36 9YU



# 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. EDWARD JUDGE	
Name	MR EDWARD JUDGE	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## **PART B - YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

I wish to object to the proposed modification because of the noise it will generate the lack of green belt land the lack of animal environment also there will no attractive landscapes

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 identity and character of Wiston village will be lost and it will become just another housing estate.

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

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

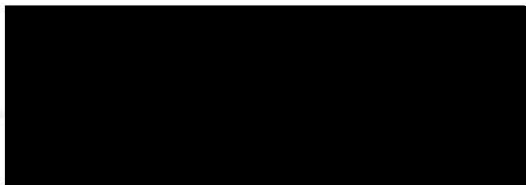
5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

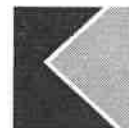
b) Yes, I wish to participate at any further public hearing

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

Signature

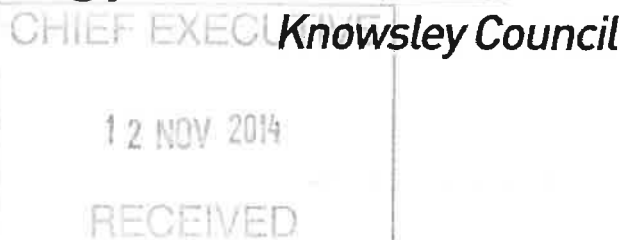


Date 1 . 11 . 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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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	EILEEN MORRIS	
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

16GB514

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 checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

I strongly object to the use of Greenbelt in Whiston for the building of over 1500 houses due to the fact that Whiston has not got the facilities to cater for all the extra residents - there ~~are~~ <sup>is</sup> not enough room in the schools - there are not enough jobs for the residents that live here now - The greenbelt areas are what makes Whiston a good place to live - take that away & we have nothing - I am sure

Continue on a separate sheet if necessary...

See back page

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

Large empty rectangular box for providing details of objections and suggested changes.

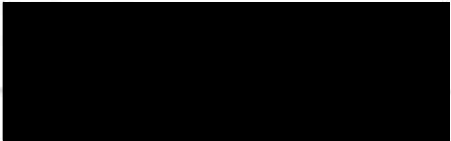
*Continue on a separate sheet if necessary...*

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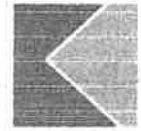
- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature 

Date \_\_\_\_\_

That there is enough brown field space within Knowsley to accommodate the extra houses that you say we require. Why do you need to even consider using green belt land - it just makes a mockery of the very term "Green Belt" - we all need open spaces. Apart from this the congestion on Windy Arber Road & Whiston village would just be unbearable.



# 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	MS	
Name	ELAINE HANLEY	
Job Title (if appropriate)	NURSE	
Organisation (if appropriate)	-	
Postal Address ▲		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Social,  
economic, environment,

## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

WHISTON ST4

Policy Ref

K&BS14

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 checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

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

I wish to object to the proposal of development in Whiston green belt area, due to the declining habitat of wild life, eg. British HoneyBee and reduction to invertebrate conservation, particularly species of butterfly that travel inter-borough. Research by Professor Emeritus John Handley, OBE, University of Manchester clearly demonstrates the importance of the 'M62 Greenbelt gateway'.

Continue on a separate sheet if necessary...



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

The brownfield sites should be considered and used before greenbelt ~~is~~ is spoilt <sup>development</sup> by unnecessary and unwanted <sup>development</sup> by the community of Ulister.

The community of Ulister already has problems with the decrease of wildlife.

Continue on a separate sheet if necessary...

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

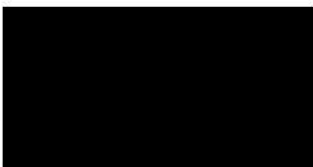
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b) Yes, I wish to participate at any further public hearing

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Signature



Date

1.11.2014

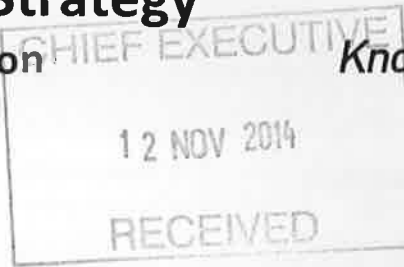
# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council



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

#### PART A – PERSONAL DETAILS

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation Elaine Rowe

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

Modification Ref MOSS  
MOGS Policy Ref CSI/CSS  
SUEADSI  
5051 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 CSI & AD51 and the SUE document are out of step with Public opinion. I would like that public meetings with the inspector be re-considered to take into account the views of local residents and stated by the government in the localism Bill. I consider the Council have not utilised empty properties & brown field sites in its calculations of housing needs. The council have not considered infrastructure improvements to cope with the influx of people.

Continue on a separate sheet if necessary...

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

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

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

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

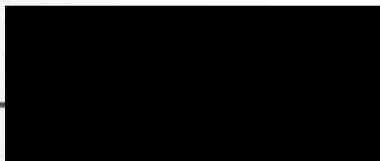
5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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

Signature



Date

1/11/14

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	ELANE SHERIDAN	
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

KCIBS14

Paragraph Ref

SOCIAL ENVIRONMENT

**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.**

SOCIAL

INFUX OF TOO MANY PEOPLE WILL OVRUN SCHOOLS, DOCTORS HOSPITALS, ROADS ETC.  
ALSO NEIGHBOURHOODS ARE NOT BUILT OVERNIGHT, NEW PEOPLE BRING NEW PROBLEMS - CRIME, DISORDER, FEAR OF CRIME.  
NOISE WILL BE INEVITABLE IF NEW HOUSING WILL BACK ONTO HOUSES. THAT ~~ARE~~ ARE EDGING THE GREENBELT CURRENTLY.

ENVIRONMENT

ES WHEN PURCHASING OUR PROPERTY IT WAS HIGHLIGHTED THAT THIS LAND WAS A FLOOD PLANE. SURELY YOU CANNOT BUILD HOUSES ON A FLOOD PLANE!  
BIRDS OF PREY ARE OFTEN SIGHTED ON THE GREENBELT - YOU CANNOT DISTURB ANY OF THE WILDLIFE, WHERE WOULD THEY GO?

RADON GAS

- THIS TOO WAS HIGHLIGHTED IN OUR SURVEY. WILL THIS BE AN ISSUE FOR NEW HOUSES?  
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.

SOCIAL  
DO NOT BUILD HOUSES ON GREENBELT

ENVIRONMENT.  
LEAVE WILDLIFE ALONE  
DONOT BUILD HOUSES ON GREENBELT.

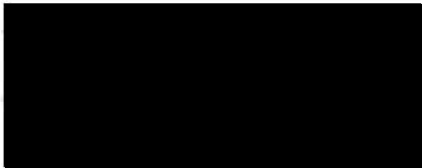
*Continue on a separate sheet if necessary*

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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

12 NOV 2014

RECEIVED

### RETURNING THIS FORM

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

#### PART A – PERSONAL DETAILS

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

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

MRS. ELESTA MUIRHEAD

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

Modification Ref

WHISTON  
SOUTH

Policy Ref

KG65 14

Paragraph Ref

E1-E11  
S1-S8

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

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

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

I strongly object to the plan to build a minimum of 1503 properties on the greenbelt of South Whiston. I am extremely concerned about the negative impact on our local environment consequent to eradication and total destruction of our wildlife and natural resources which are so vital to health and well being. Poor environmental conditions do cause stress, isolation, ill health, poverty with subsequent increase in dependence on social benefits.

Continue on a separate sheet if necessary...

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

I consider that further consultation, wise reference to historical changes in other societies/localities which were changed at whim and destroyed subsequently. I think that Brownfield sites should be developed to release apparently useless land for the very purposes that Greenbelt land is being destroyed. If the current environment is improved, we would see the beneficial impact on health, ~~and~~ education, wealth, social status, universal benefits.

Restore Empty and rundown properties for use.

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

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

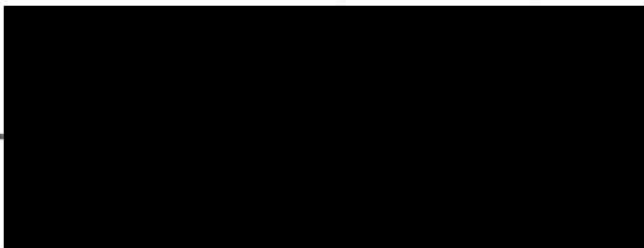
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a) No, I do not want to participate at any further public hearing

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

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Signature

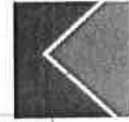


Date

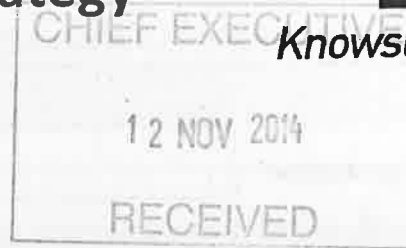
01/11/14

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	ELLEN HOLDEN	
Job Title (if appropriate)	DOMESTIC	
Organisation (if appropriate)	WHISTON Hospital	
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

SUE

Policy Ref

KGBS4

Paragraph Ref

E5

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

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 will be too much congestion on Windy Arbor Road there is not enough amenities such as schools doctors hospitals to cater for the extra 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.

m. p. Eric Pickles stated that  
he was not touching green belt  
land. and educational land - needed  
for the people of Whiston 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.

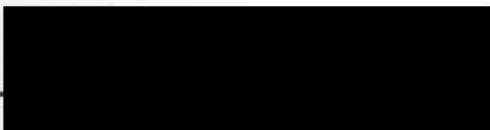
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Signature



Date 01.11.14

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



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

#### PART A – PERSONAL DETAILS

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

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

K96S14

Policy Ref

E1 - E9

Paragraph Ref

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

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input 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 SHOULD BE PROTECTING  
OUR GREEN BELT WE NEED TO KEEP  
OUR CONSERVATION AREA AS IT IS  
FOR WILD LIFE AND AREAS OF SPACE  
AND RECREATION, ALSO WE DONT NEED  
MORE NOISE & POLLUTION WICH THIS WILL  
CAUSE. IT WILL ALSO PUT PRESSURE ~~ON~~ CAUSED  
BY MORE CONGESTION AND POOR AIR QUALITY  
NOT TO MENTION AN INCREASED STRAIN ON  
PUBLIC TRANSPORT.

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.

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

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

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

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

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Signature



Date

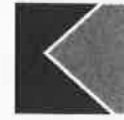
1/11/2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council



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

**PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MR.	
Name	Eric Sibley	
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

FC STRATHANS

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

Modification Ref

K9B14

Policy Ref

K9B14

Paragraph Ref

E23

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

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.**

Wharfedale Village Shopping Area & surrounding Area.  
are now used to to, these various outlets  
if more outlets are created than local stores.  
would vanish!

Employment opportunities for local people. A  
restriction are now estimated, as all jobs have to go  
out for tender? leading to various builders  
development from central area which can use  
local trades persons, as stated in Dock & B.S.14  
SA.017.E23.

which will may. prospective & possible scene in  
the Core Street Plan. will not guarantee that any  
jobs will be created!

Continue on a separate sheet if necessary

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

No To Building A Green Belt.

Plenty of Brown Field. in  
the surrounding Area To Build  
Houses.

*Continue on a separate sheet if necessary*

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S

Date

1/11/2014

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	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

KCBS 14

Paragraph Ref

E2  
E1.57E5

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

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

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

- Building 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.  
Continue on a separate sheet if necessary...
- Schools are already overcrowded.



4. If you are objecting to the modification please set out how you consider it should be changed to make 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 ON POP

RE CONVIENE PUB INSP

USE EMPTY HOUSES

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

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

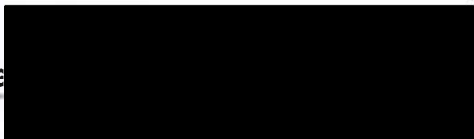
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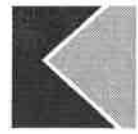
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Signature



Date

1-11-14.

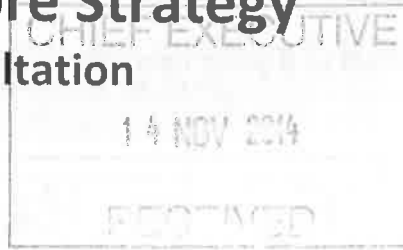


Knowsley Council

# 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	MRS.	
Name	FRANCES PARRY	
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

FRANES PARRY

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

Modification Ref

AD51

1 and south of 62

Policy Ref

H6BS14

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

NOT POSITIVELY PREPARED

Supposedly based on assessed needs of the area. But councillors admitted they do not really know how many houses will be build. Nor where the people will come from to fill the houses. Not looked at how it will affect surrounding areas e.g. traffic, schools, doctors, hospital etc.

NOT JUSTIFIED

Local communities not sufficiently targeted. Many people still have no idea it is going on. Many information brochures were not received by house holds - Jonathan Clark aware of this. People can't object if they don't know about it

Continue on a separate sheet if necessary...



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

use brown land first then think of greenbelt land when there is no alternative

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

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

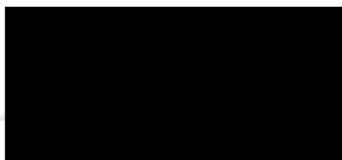
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Signature



Date

12/11/14

## FRANCES PARRY

Not justified could.

- o Use of greenbelt not the most appropriate strategy as there are enough brown field sites in the area. These should be used first before green belt is considered.
- o social environment will be changed dramatically by changes. (Schools, doctors) economic environment - very few jobs in the area and not enough planned to stop people moving in without jobs.  
Resources - very few available to people already in the area. Schools, doctors are full. Hospital will struggle with influx of people. Transport not up to influx. Road system bad.

## NOT EFFECTIVE

- o Not enough planning gone into what will be put in place for infrastructure of the area. Very little detail available.
- o Councillors not aware of who or what is involved in the building of houses or amenities. No body seems aware of time scale. No one named to overlook it
- o The plan is the main reason why there will be major changes in the area and as such will generate more changes and needs. No formal review planned

## FRANCES PARRY

Not consistent with national policy

- o Green belt should only be used in exceptional circumstances when all brown land has been utilised. Lisa Harris (Councillor) says there is enough brown land available.
- o Developers are deciding what is to be built - not councillors e.g. how many houses 30-40 per hectare? 150? ?
- 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

### RETURNING THIS FORM

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

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

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

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	FRANCIS MOORE.	
Job Title (if appropriate)	PERSONAL TRAINER.	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

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

Continue on a separate sheet if necessary...

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

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

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

The plan is not consistent with National Policy as the governments own guide lines 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...*

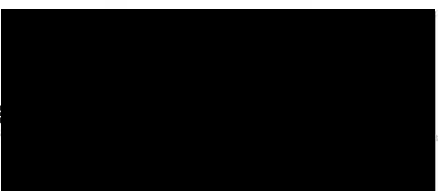
**INSPECTOR MUST SAY NO.**

**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 

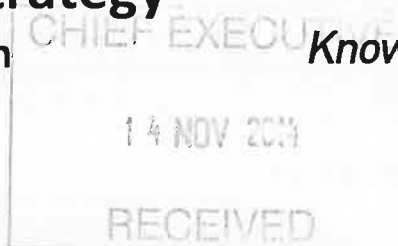
Date 3/10/2014.

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



### RETURNING THIS FORM

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

#### PART A – PERSONAL DETAILS

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

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

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**PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

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

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

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  
green belt .

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

**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

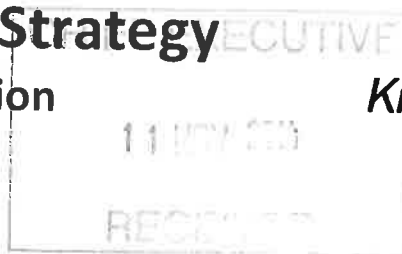
12/11/14



# 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	[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

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

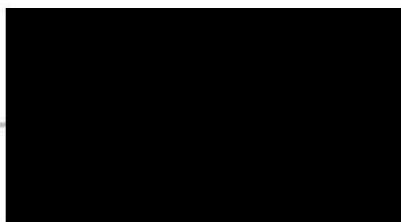
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**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

ne 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





HOUSE OF COMMONS

Local Plan Team  
Knowsley MBC  
1<sup>st</sup> Floor Annexe  
Municipal Buildings  
Archway Road  
Liverpool L36 9YU

14 November 2014

To whom it may concern:

I held a meeting with residents who had contacted me about the proposed Local Development Plan, specifically in regard to those proposals relating to the greenbelt within the Knowsley constituency.

Below are two separate but related sets of objections which were raised with me: first, I will set out objections to the consultation process and; secondly, planning objections. Some residents handed me documents at the meeting which they wish to be considered and I have scanned them and forwarded them to you in separate emails.

1 The consultation process:

Dr John Sills, in his submission to the Local Plan Team dated 9th November 2014, covered the issue of the consultation process in detail. Point 1 of his communication makes the point that both the scope and scale of the written notice of the consultation was not adequate and that the council should '...consider re-convening the consultation process to take note of the views of local residents...'

Another resident from Knowsley Lane who was legally entitled to be consulted in writing insists that she was not consulted. I have advised her to formally complain to the Ombudsman and have undertaken to take up her complaint on her behalf when she contacts me with her details. Dr Sills makes a similar complaint and I would be happy to also refer his complaint to the Ombudsman should he so wish.

2 Planning objections:

a) The character of Knowsley Lane and Knowsley Village:

Residents expressed the view, strongly held, that the proposals would, inevitably, transform the character of the area which, at present, is semi-rural and, in some parts, very rural and quite remote.

b) Traffic volume:

The view was expressed that the current volume of traffic, particularly that using Knowsley Lane, is already heavy. Two residents have undertaken their own traffic survey but the council should carry out an official traffic survey to assess the impact the proposal would have on the volume of traffic. This should apply to all sites under consideration.

c) The amenity of the area:

The loss of amenity the proposals represent in terms of open space for play and recreation purposes was highlighted.

d) Environmental Impact:

Residents expressed great concern about the environmental impact the proposals would have across all the greenbelt areas under consideration. A detailed environmental impact assessment is required for all sites under consideration to assess the potential effects on the wellbeing of residents, environmental pollution, flooding (which is already a periodical problem in Knowsley Village) and established wildlife habitats.

e) Housing Demand:

Residents questioned the need for the volume of new housing proposed for the sites under consideration. They felt that there is a lack of clarity about how the demand for additional housing has been evaluated and the demographic basis on which such calculations are based.

f) Greenbelt Prescott:

Dr Sills points out in his letter that when the sites concerned were incorporated into the greenbelt in the early 1980s, in response to a proposal to develop an office buildings, there was an implicit assumption that it would form a buffer against continuous development. It is argued that this need is still relevant.

g) Prescott Conservation Area:

Residents felt that the proposals would undermine the conservation area and would not be in keeping with the historic nature of the town.

h) Water main:

Building over the water main from Prescott reservoir would render it difficult to gain access to repair and deal with leaks and there has been a history of such leaks.

i) Knowsley's Green Borough Policy:

Some residents asserted that the proposals were in conflict with the Council's overall claim to be a 'green borough.'

Yours sincerely,

A large black rectangular redaction box covering the signature of the sender.

Rt Hon George Howarth MP.



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

CHIEF EXECUTIVE

12 NOV 2014

RECEIVED

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	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

MO 55  
NO 65

Policy Ref

CS1 TO CS5.  
SUE ADS1 32

Paragraph Ref

3.20 3.21  
3.23 3.24  
3.26 4.10

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

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <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 ADS1 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...*

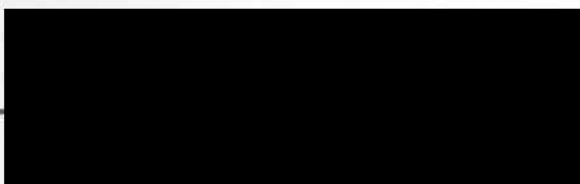
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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

**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

*Rainhill Parish Council*

Clerk to the Council:  
Gillian Pinder



Website: [www.rainhillparish.org.uk](http://www.rainhillparish.org.uk)



To: [Redacted]  
Knowsley Council

23 October 2014

Dear Sir,  
**Proposed Modifications to the Local Plan: Core Strategy**

I am instructed by Rainhill Parish Council to object to the proposed modifications to Knowsley's Core Strategy. Specifically the proposed removal of land from Green Belt to provide Sustainable Urban Extension on land adjoining Rainhill Parish, classed as 'South of Whiston'. The proposed release of this land for the development of 1503 dwellings is neither legally compliant nor sound.

#### Legal Compliance

The proposal conflicts with the National Planning Policy Framework's Green Belt purpose: to prevent neighbouring towns merging into one another.

Further at paragraph 84 the NPPF advises that:

"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

The Parish Council consider that the site is not in a sustainable location as required by NPPF. Development of the site will have a detrimental impact on highway movements. The site is not well served by public transport and will result in an unacceptable increase in traffic both on Fox's Bank Lane and Blundells Lane, both of which are within St.Helens borough and within Rainhill Parish Council area.

#### Soundness

The proposal would not result in sustainable development as infrastructure requirements have not been addressed. The Delivery Infrastructure Plan does not detail any public transport or highway improvements to deal with the increased commuter or vehicle movements. It is impossible to see how this traffic will be accommodated.

Further, the proposal will affect areas of priority habitat and Local Wildlife Sites together with affecting the water table, with possible impacts for Halsnead fishing lake. The lack of mitigation is recognised in the sustainability appraisal, which acknowledges "a major negative impact on the objective relating to protecting land and soil; and some negative impact on the objectives relating to protecting biodiversity, species and habitats; mitigating climate change; and conserving green infrastructure."

The Parish council believe these issues have not been sufficiently addressed and designation of this land is premature and unsustainable.

Yours Sincerely

[Redacted Signature]  
Gillian Pinder  
Clerk to Rainhill Parish Council



Awarded for excellence

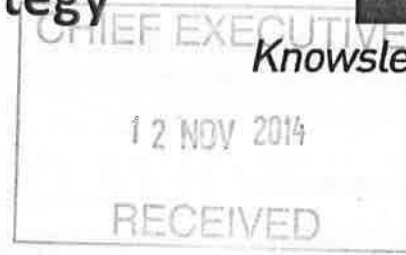
Serving the Rainhill Community since 1894

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



### RETURNING THIS FORM

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

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

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

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

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	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		

*\*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 Gina O'Dowd - local resident

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

Modification Ref KGB514 Policy Ref ~~1~~ 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.**

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 ringenced 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~~<sup>error</sup>) 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~~<sup>error</sup>) 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

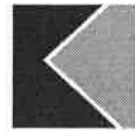
**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

[Redacted Signature]

Date

1/11/2014



# 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	GLADYS WEBSTER	
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

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 Huxton/Whiston former fire stations therefore such haste is no longer necessary to remove the Edenhunt 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 U.D.P. 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...

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

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

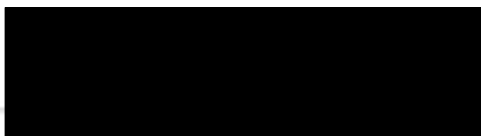
a) No, I do not want to participate at any further public hearing

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

*I am physically unable being over 90 years old*

**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 20 / 10 / 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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

#### **PART A – PERSONAL DETAILS**

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

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

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref

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 metholdoliegs 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

**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

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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

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, 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

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**Signature**

G Moorcroft

**Date 13 Nov 14**

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# Knowsley Local Plan: Core Strategy EXECUTIVE

## Proposed Modifications - Consultation Representations Form

Knowsley Council

05 NOV 2014

RECEIVED

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	H RYE	
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 H Pye

### 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 wish to object to all plans of building on green belt not just the modifications to the plans, as they say when it's gone it's gone so use all the brown sites first not the green lands. In the UK town planning the green belt is a policy for controlling urban growth to maintaining area where agriculture forestry and outdoor leisure. In 1955 the minister of housing Duncan Sandys encourage local authorities to consider protecting land around towns to designation of defined green belt land (The National Planning Policy Framework) 27 MARCH 2012 Green belt serves five purposes 1 to check the unrestricted spread of large built-up areas. 2 to preserve neighboring towns merging into one another. 3 to assist in safeguarding the countryside from encroachment 4 to preserve the setting and special character of historic towns 5 and to assist in urban regeneration by encouraging the recycling of derelict and other land. The government attaches great importance to the green belt. Also the land at the back of Windy Arbor road and along the motor way to Sox's Bank road has been used for the growing of grain crops each year, so the land is used for growing food instead of importing food.

Continue on a separate sheet if necessary...

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

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

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

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

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Signature

Date



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

CHIEF EXECUTIVE

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	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. ENIC PICKLES <sup>planners</sup> recently made  
comments regarding <sup>how</sup> protecting the  
green belt - please listen to  
his views.

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

Please, 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.

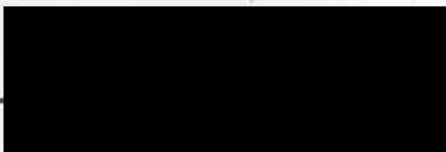
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a) No, I do not want to participate at any further public hearing

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

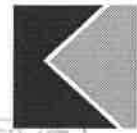
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Signature



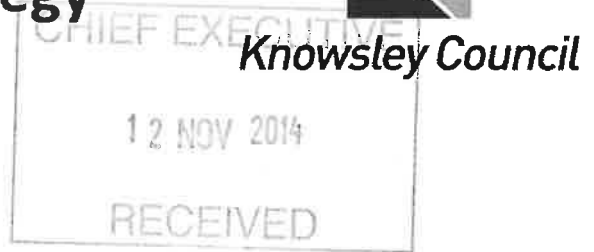
Date

1/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



### RETURNING THIS FORM

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

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
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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	HILL	
Job Title (if appropriate)	TRAIN 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

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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IF this development goes ahead, there will be not dedicated green belt left in South Whiston. IF find it a disgrace that the council, that is supposed to represent the residents, have again overlooked local people with a view to allow development through the back door. What next????

*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.

leave it alone. The green belt is for local people.  
not for the council to use, at will,  
Reference statement of Eric Pickles in September,  
about releasing green belt, these are not  
acceptable 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

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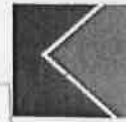


Date

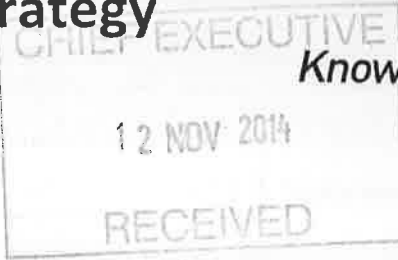
1/11/14.

# 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	NR	
Name	HOLFORD HOLDEN	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

Name and/or Organisation

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Modification Ref  Policy Ref  Paragraph Ref

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

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

I object because Whiston will be come to congested, all the green spaces will go. there is not enough school for the extra children, doctors will be overrun there will be 1,000 more cars going on to the roundabout.

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 object to Land at Whiston green belt for the following reasons. There would be less fields for the children to go. Eric Pickles stated that he was going to leave green belt land alone.

Continue on a separate sheet if necessary...

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

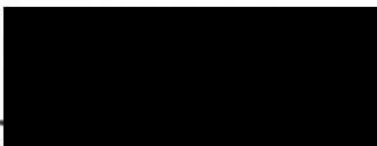
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a) No, I do not want to participate at any further public hearing

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Signature



Date

1<sup>st</sup> - 11 - 14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

RECEIVED

### RETURNING THIS FORM

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	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) | <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 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.

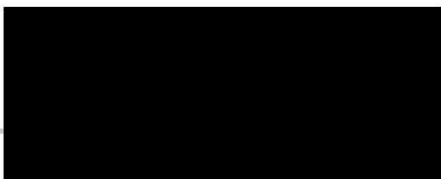
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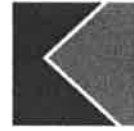
- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date 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	<del>Ray Davis</del> MRS IRENE DAVIS	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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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.

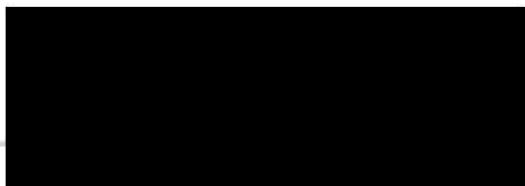
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Signature



Date

25/10/14

## KNOWSLEY LOCAL PLAN: CORE STRATEGY

### Submission and Objections regarding proposed modifications

P R Davis  
Whiston Green Belt Action Group

#### Sustainability Appraisal Report SD32

Implications for South Whiston and 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 hectare<sup>13</sup>.

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

## **“Councils must protect our precious green belt land”**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

#### *KGBS 14 - South of Whiston*

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

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

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

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

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

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

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

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

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

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

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

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

#### *CS5 - Green Belt*

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

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

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

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

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

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

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



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

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

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

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

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

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

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

*CS14: Principal Regeneration Area – Prescott Town Centre*

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

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

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

**Not proved**

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

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

5.177 The revised policy also still encourages the re-use of vacant and underused historic assets and states that favourable consideration will be given to schemes that enhance the importance of the asset for the economy. The policy could thereby result in the creation of premises for new businesses. In addition, protecting and enhancing buildings and features of historic interest should help create more attractive places to invest in and could lead to enhancements to 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 21<sup>st</sup> century, particularly as we all face the prospect of climate change. The demand on energy, water and other resources is likely to be much higher.**

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

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



# Rainhill Civic Society



preserving the past • caring for the present • planning the future



13th October '14

Dear [REDACTED]

According to the Daily Telegraph of the 3rd October, the Secretary of State for Local Government and Communities, Eric Pickles MP, has issued fresh guidance on the Green Belt to the effect that Green Belt boundaries should only be altered in exceptional circumstances, and this overrules existing guidance. Furthermore this means that intrusions into the Green Belt to meet 5 year housing targets (which appeared to be the paramount object of the Inquiry) are not justified.

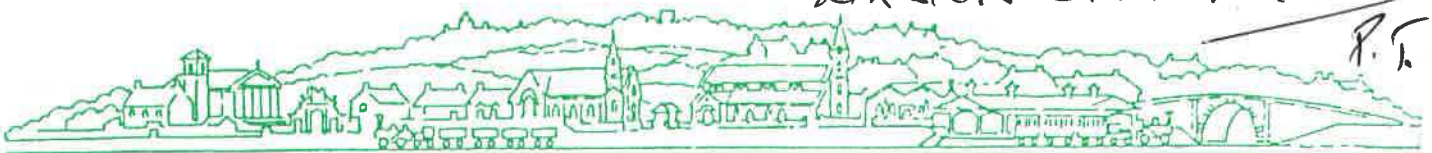
Accordingly there now seems no exceptional circumstances which would allow development in the Green Belt in Knowsley, Whiston and Halewood, and the core strategy needs to be reviewed in the light of this new guidance.

Yours Sincerely  
[REDACTED]

Jim CARTER

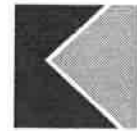
VIC-CHAIRMAN AND PLANNING  
NATION OFFICER.

P.T.O.



## For Information,

1. The messayside on S.E. Lancashire Green Belt was established over 50 years ago by Lancashire County Council.
2. Until the second world war, Knowsley was a collection of Villages in Whiston Roe (Kinsey, Whiston, Croxtan, Tealock and Halewood) plus Huyton and Raescoe.
3. When Knowsley was created in 1974 it had a population of 193,000 and has lost approximately 40,000 since 1974 an average of 1000 per year.
4. In 1974 half the houses in Knowsley, had been built and were owned by Liverpool Corporation £26.500.!
5. The Borough Treasurer and I (Borough Secretary and Deputy Chief Executive) agreed a deal with our colleagues in Liverpool to transfer these dwellings at outstanding debt.
6. With the above and the 12,500 dwellings owned by the constituent authorities the Council owned over 200,000 of the dwellings in the Borough. Accordingly the Authority was mainly a Council estate.
7. There has already been an attempt to abolish the authority which was successfully resisted, but it has lost 1 of its 2 MPs. So its viability is in doubt.



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



#### RETURNING THIS FORM

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

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

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

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Ms	
Name	Jacqueline Lunt	
Job Title (if appropriate)	senior practitioner	Health - child + adolescent mental
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

**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 Jacqueline Lunt

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

Modification Ref  Policy Ref KGBS14 Paragraph Ref E1  
~~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"/> ← maybe but                  |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> <u>NOT</u> sound. |

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

E1. unsound because .....  
It is impossible to see how so many houses 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.  
→ etc.

Continue on a separate sheet if necessary...



ctd.

EI etd.

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 is good 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 Bramfield.  
This is immoral + release of green belt is not  
acceptable.

This is not consistent with national policy + aims to  
protect public health.

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

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

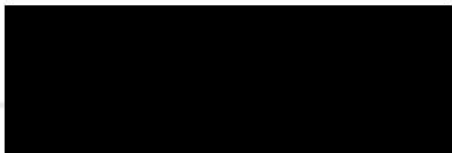
5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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

Signature

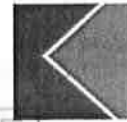


Date

1.11.14

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

CHIEF EXECUTIVE

12 NOV 2014

RECEIVED

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JAMES O'BOURKE	
Job Title (if appropriate)	PRINTER	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

Yes

No

a) Legally Compliant? (see guidance note 2.2)

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 development of Green Belt in Whiston will have a negative effect on the aim to mitigate climate change. The Sustainable and Low Carbon Development (S.183 S032 CS22) removal of the developers need to meet sustainable homes/ BREEAM standards will increase energy ~~usage~~. The increased traffic in the area will increase carbon emissions and have a detrimental effect on air quality. The Industrial Estate mentioned on Windy Hill 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~~ 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. Continue on a separate sheet if necessary...

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

There are plenty of 'brown field' sites that could  
~~be~~ be utilized first. Use empty properties.  
Keep us better informed.

Continue on a separate sheet if necessary...

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

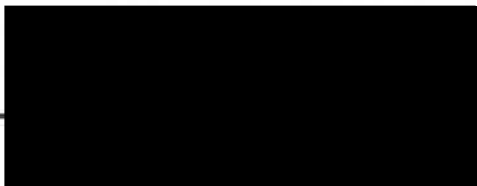
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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Signature



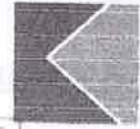
Date

01/11/14

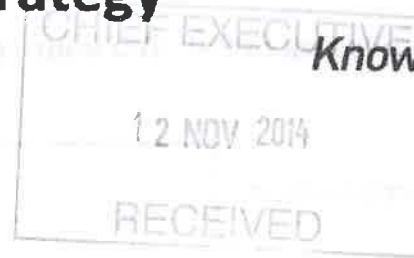


# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



### RETURNING THIS FORM

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

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

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	JAMES R. ORMOND	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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## PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

Policy Ref

Paragraph Ref

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

- |   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input 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 OBJECT TO THE EXTRA POLLUTION, TRAFFIC NOISE THAT THIS WILL CREATE.

ALSO THE VAST AMOUNT OF GREEN BELT AREA THAT WILL BE LOST

ALSO THE EFFECT THIS WILL HAVE ON THE LOCAL COMMUNITY

IE. STRAIN ON SCHOOLS, ~~OR~~ HEALTHCENTRES DR. APPOINTMENT

WE HAVE TO WAIT OVER A WEEK NOW TO SEE A GP.

THIS WILL ALSO IMPACT ON THE LOCAL PARKING AREAS.

THE WILDLIFE IN THIS AREA WHICH HAS NOT BEEN

CONSIDERED, AS FAR AS I AM CONCERNED.

RELEASE OF THE GREEN BELT AREA IN S. WHISTON WILL

CONTRADICT THE PURPOSE OF GREEN BELT TO RETAIN ATTRACTIVE

LANDSCAPES. AS THIS IS THE LAST AREA OF GREEN BELT WITHIN S. WHISTON

AREA. WE WILL NO LONGER HAVE A Continue on a separate sheet if necessary...

TO THE NATURAL ENVIRONMENT AND THE BENEFITS THIS ENSUES



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

There is no reason to build on Greenbelt  
there are enough brownfields and empty  
properties in the Knowsley Area  
Take into account guidance from Eric  
Pickles on 16<sup>th</sup> Oct 2014 -  
carry out up to date transport survey  
take into account population figures  
from O.N.S. 2014  
Re-convene public inspection

Continue on a separate sheet if necessary...

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

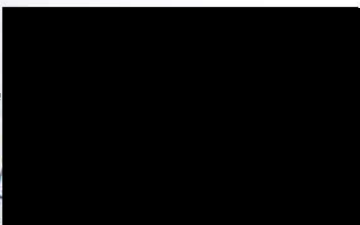
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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Signature



Date 01/11/14

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council

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

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Ms	
Name	Jane Aspinall	
Job Title (if appropriate)	Planning Manager	
Organisation (if appropriate)	██ ██████████	
Postal Address	████████████████████ ██████████	
Postcode	██████████	
Telephone Number	██████████████████	
Email Address	██	
Preferred Method of Contact	email	

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

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## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

Proposed Modifications M001, M020, M022 and M024 are supported in providing clarification on the role of the Sustainable Urban Extensions, including the site East of Halewood.

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

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

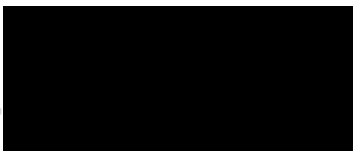
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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

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

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Signature



Date 13 November 2014

## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

We support the identification and allocation of the Sustainable Urban Extensions in Policy CS1 including the last East of Halewood which is required to meet identified needs for housing.

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

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

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

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

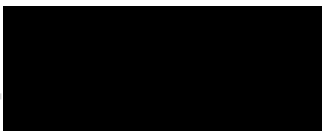
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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Signature



Date 13 November 2014

## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

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

Modification Ref

M055

Policy Ref

CS3

Paragraph Ref

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

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

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

We support the identification and allocation of the Sustainable Urban Extensions in Policy CS3 including the last East of Halewood which is required to meet identified needs for housing.

For the reasons we state in our response to Policy CS5 we do not consider that there is a requirement for Criterion 4 within the body of the policy and that this should be moved to the supporting text. There is therefore no need to cross reference Policy CS5 within the text of Policy CS3.

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

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

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

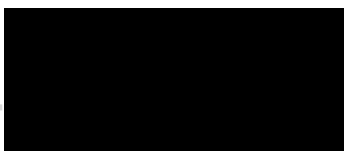
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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Signature



Date 13 November 2014



## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

This modification seeks to insert wording which is not in itself a “policy” and provides information. This text should be included in the supporting justification and is not necessary within the body of the policy.

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

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

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

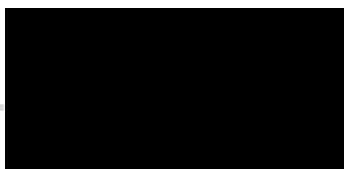
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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Date 13 November 2014

## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

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

Modification Ref  Policy Ref  Paragraph Ref

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

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

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

We support the provision of clarification that the area priorities will apply to the Sustainable Urban Extensions in M133 and M166. However, as Policy CS5 is effectively a relatively standard Green Belt policy it is unclear why the reference to this policy is retained as the review is no longer (due to modifications to that policy) “in accordance” is incorrect and the policy does not now on its own seek to meet development needs (it is a policy of constraint).

We support the modification of the Halewood Map (6.4) as proposed by M167.

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

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

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

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

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

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

Signature



Date 13 November 2014

## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

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

Modification Ref

M168 etc

Policy Ref

Paragraph Ref

N/A

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

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

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

We support the amendments that are proposed through M168 which proposes the inclusion of an additional chapter to address the proposed Sustainable Urban Extensions.

We support the proposed wording of Policy SUE1 and the recognition that these sites are meeting needs during the current plan period and beyond and the implementation of the associated changes to the Green belt boundaries. We specifically support the inclusion of the East of Halewood site (criterion 1(g)) for a residential led development. Criterion 4 should be amended as it refers to “guidance” in policies SUE2 and SUE2a to 2c but this is policy and not guidance. Criterion 5 may not be necessary as by reference to the Policies Map and Policy CS5 it is apparent that this is a matter of fact rather than policy.

In terms of Policy SUE2, whilst we support the Policy in principle, the degree to which it adds value rather than simply repeats other policies is however unclear. It is apparent in terms of the detailed criteria that:

1(a) repeats Policy SD1

1(b) requires a comprehensive approach but this could be included within SUE1 and repeats Policy CS27

1(c) repeats Policy CS19

1(d) repeats Policy CS2

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

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

- 1(e) repeats Policy SUE1
- 1(f) repeats Policy CS8 and CS21
- 1(g) repeats Policy CS7
- 1(h) repeats Policy CS20
- 1(i) repeats Policy CS24
- 2) makes reference to “indicative considerations” which are not in themselves policy and therefore this could be in the supporting text.
- 3) simply confirms the council will prepare SPD for certain sites which again is not in itself a policy and just is a statement of intent.
- 4) provides more detail on 1(b) as outlined above but this could be reasonably incorporated within Policy SUE1.

On this basis it is considered that a large part of this policy could be omitted or included within the supporting text, and that those parts which cannot, can be readily and more appropriately incorporated within Policy SUE1.

Policy SUE2b applies specifically to the land East of Halewood and is broadly supported, subject to the comments on SUE2 and associated references, and the matters below. It is known that part of the site is constrained by flooding but the degree to which this impacts upon the capacity of the site is not precisely known. It is considered that the site could readily accommodate 1200 to 1300 dwellings and that evidence has previously been submitted to the Inspector (see the Development Statement for this site (Examination Document RH26a).

*Continued...*

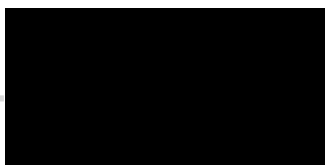
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5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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Signature



Date 13 November 2014

It is therefore considered that the yield from this site should be identified to be **at least** 1200 dwellings rather than “approximately 1100 dwellings”. There is no evidence that indicates that this higher requirement cannot be achieved and indeed past masterplanning work has indicated that even taking into account the open space and flood mitigation requirements, a significantly higher yield can be achieved.

In addition to the proposed residential development it is considered that other uses may be appropriate on the southern portion of the site between Higher Road and the railway line to the south. The policy should be amended to make provision for the fact that some non-residential uses may be appropriate on the site. This would allow the SPD to provide guidance on what these may be and the circumstances in which they may be acceptable.

## **PART B – YOUR REPRESENTATIONS**

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

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

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

Modification Ref

M179 etc.

Policy Ref

CS17

Paragraph Ref

7.23

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

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

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

We support the deletion of the requirement to achieve the Code for Sustainable Homes, BREEAM and decentralised renewable and low carbon energy systems (see also M183, M208, M209, M210, M212, M215, and M217) and the removal of the requirement to achieve Building for Life and Lifetime Homes. We do not consider that those requirements could be justified and could adversely affect the deliverability and viability of new development.



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

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

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

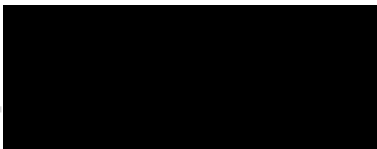
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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

Signature



Date 13 November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

### RETURNING THIS FORM

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

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

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

### PART A - PERSONAL DETAILS

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

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

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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 retired to this area for a quiet life after working 45 years in the Health Service, this was our dream now it's 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...

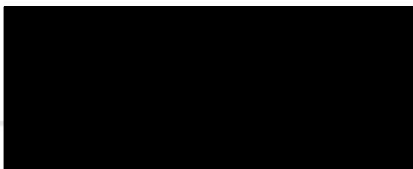
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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

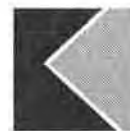
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Signature



Date

1/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council

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

#### PART A – PERSONAL DETAILS

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

*\*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

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)

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 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 WINDY 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 GUARANTEE 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 DANGLER POINTS FOR TRAFFIC AND PEDESTRIANS. Continue on a separate sheet if necessary...

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

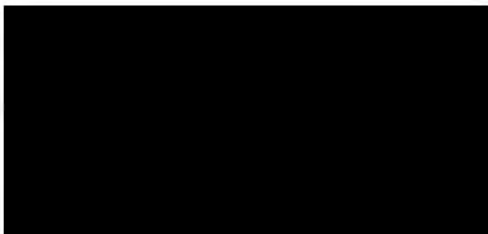
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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

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

Signature



Date

1/11/14

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council

CHIEF EXECUTIVE

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	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"/> |

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

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

May encourage further investment in the area sustaining local employment and also potentially bringing new jobs into the area is not a 'sound' reason for economic development, competitiveness and productivity of business as stated Document KQBS 14 SA Objective ECI.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Carry out an up to date housing requirement survey taking into account the latest figures from the office of National Statistics.  
Carry out a relevant Traffic Management survey taking into account the existing 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

1st Nov. 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council

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#### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JASON BROWN	
Job Title (if appropriate)		
Organisation (if appropriate)	WHISTON GREENBELT ACTION GROUP	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation WHISTON GREENBELT ACTION GROUP

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref MOSS TO MDGS Policy Ref CS1, TOCS5 SUE ADS1 Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

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...*

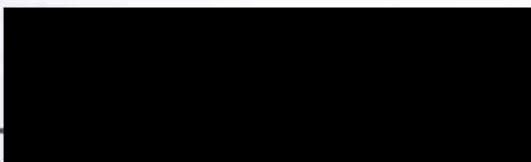
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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
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Signature



Date

29/10/14



# Knowsley Local Plan: Core Strategy

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Knowsley Council

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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	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

1C GBS

Policy Ref

12A

Paragraph Ref

E2

14

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input 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 12<sup>th</sup> 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 excellent 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.

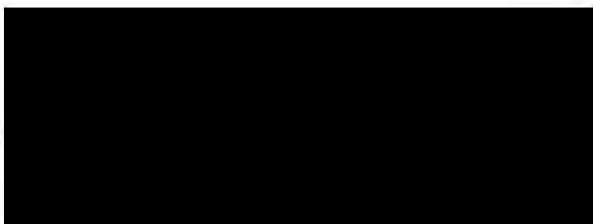
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a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date





Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

10 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	Ms	
Name	JEAN QUINN	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The purpose of Green Belt in planning policy are clearly 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.

*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.

*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.

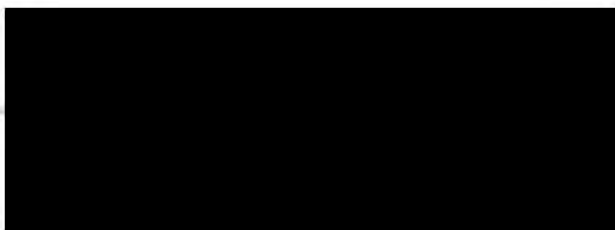
**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

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 4 - 11 - 2014

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



CHIEF EXECUTIVE  
Knowsley Council

12 NOV 2014

RECEIVED

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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	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 RUSH

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

K9B514

Policy Ref

Paragraph Ref

E3

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

THERE IS A 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 precious resource need to met + mainted. 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.

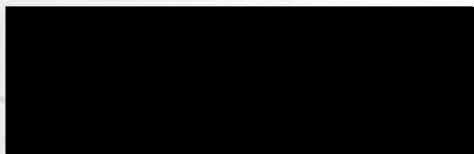
5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

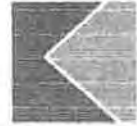
b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 1-11-14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

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- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	mrs	
Name	Jeanette Sephton	
Job Title (if appropriate)	Independent Sexual Violence Adviser	
Organisation (if appropriate)	Rape & Sexual Abuse Support Centre	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I object to the proposals - as I live close to ad wood and Big water this is a safe haven for lots of listed endangered species including grey partridge this bird relies on farming for food

The ecological affect on the wildlife and cause extinction of some species.

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 chose to put my savings into my bungalow because of the greenbelt as I am hoping to retire in the next 10 years - I now feel cheated as more housing is going to kill off our village like community and cause bigger stresses on local amenities GPs Hospital Schools not to mention the traffic. I do not have any faith that the local authority can deliver the project the evidence is clear re poor performance ratings for most of the public services - also there are plans to develop brown field sites we should at least wait to see if these projects work first

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

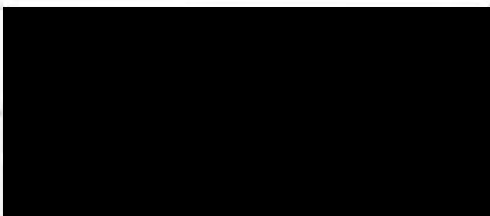
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a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date 1/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

12 NOV 2014

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	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

KG-BS14

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"/> |

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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...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

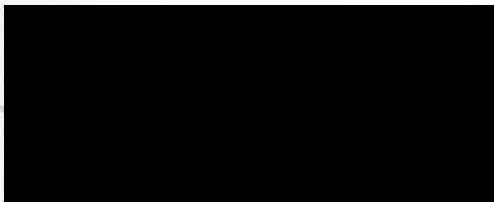
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a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date 1 / 11 / 14



# Knowsley Local Plan: Core Strategy

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Knowsley Council

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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MS.	
Name	JENNIFER LE POIDEVIN	
Job Title (if appropriate)	CLINIC MYQUEMIST.	
Organisation (if appropriate)	N.H.S.	
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

JENNY HE POIDEVIN

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

SUB2A

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)

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.

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 the 110 hectares of green belt in Whiston acts as a sump 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 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 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.

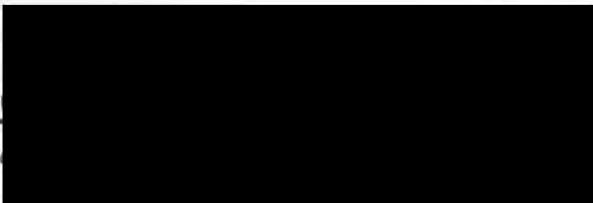
5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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



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	Dr	
Name	Jennifer Mullin	
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 Jennifer Mullin

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref KGBS 14 Paragraph Ref E1

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

*Continue on a separate sheet if necessary...*

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

I do not think that the proposed plan is sound for the following reasons:

- It is the last remaining proper green space in the Whiston area.
- The infrastructure around the area cannot cope with so many new houses. For example GP surgeries, NHS drop in centres, Schools, the local hospital, child care facilities etc.
- The proposed development will lead to a great increase in pollution due to increased traffic. The industrial development of the former colliery site will also lead to increased levels of pollution
- The development will put extra strain on the already busy roads. Tarbock roundabout is already extremely busy. This will lead to gridlock.
- There are already not enough jobs to support the local community. More residents will lead to increased competition for existing jobs. This will result in higher levels of unemployment and lead resentment from existing residents.
- The site is an important habitat for lots of wildlife, including some rare species. The development would be extremely detrimental to the wildlife.
- Natural green space is important to resident's health and wellbeing. It is especially vital in Knowsley as there are two major motorways in very close proximity. The greenbelt land provides an important divide between these noisy, pollution filled motorways and resident's homes.
- Brownfield sites already exist in Knowsley which would be better suited to development. These brownfield sites should be developed before greenbelt sites are even considered for development.
- There are no exceptional circumstances to justify the destruction of the long established Green Belt land in Whiston.

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**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

a) No, I do not want to participate at any further public hearing

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**Signature**



**Date 11/11/2014**



[REDACTED]

**Your ref**  
**Our ref** DC-14-3428  
**Date** 13 November 2014

Local Plan Team  
Knowsley Council  
1st Floor Annexe  
Municipal Buildings  
Archway Road  
Liverpool  
L36 9YU

**By Email ([local.plan@knowsley.gov.uk](mailto:local.plan@knowsley.gov.uk))**

Dear Sir / Madam,

**KNOWSLEY LOCAL PLAN: CORE STRATEGY – FURTHER PROPOSED MODIFICATIONS CONSULTATION**

Thank you for your consultation seeking the views of United Utilities as part of the development plan process.

United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within the North West. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

(Continued...)

Once adopted, the emerging Core Strategy will represent the key planning policy document for Knowsley, setting out the central, overarching strategy for the Borough within the wider Local Plan. It will set out a vision, key objectives and strategic planning policies for Knowsley up to and beyond 2028.

United Utilities has commented on previous stages of the document's preparation, most recently submitting comments (UU Ref: DC-14-2636) to the 'Core Strategy Submission Document Incorporating Proposed Modifications' consultation on 11 July 2014, before which we also made comments on the potential additional sites being considered for release from the Green Belt.

We now write to submit the following comments to the Council for consideration as part of the current 'Core Strategy: Further Proposed Modifications' consultation, which runs until 12pm on Friday 14 November 2014.

## **GENERAL COMMENTS**

We wish to highlight that United Utilities will seek to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations. New development should be focused in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions throughout the development of the Local Plan.

### **Sustainable Urban Extensions**

The emerging Core Strategy includes a number of potential site allocations for areas to be removed from the Green Belt to meet future development needs, referred to as "Sustainable Urban Extensions" (SUEs). We note the very significant size of some of these sites and would like to emphasise that it is difficult for United Utilities to fully understand the potential impact on our infrastructure until we have more details on connection points, the nature of the development, the timing for the delivery of the development and also the approach to surface water management and drainage.

Given the size of these sites, it may be necessary to co-ordinate infrastructure improvements with the delivery of the development once more details become available. In addition, for the larger development sites it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers.

Once more information is available with respect to specific development sites, which is often only at planning application stage, we will be able to better understand the potential impacts of development on infrastructure. In the interim, you may be aware that we are currently working with your consultants to discuss the SUEs in greater detail.

## **SPECIFIC COMMENTS**

### **Previously Developed Sites in the Green Belt**

As per our previous comments in July 2014, United Utilities wishes to support the addition of Paragraph 5.41A which sets out an intention to identify major developed

sites in the Green Belt used by utility operators in the Local Plan: Site Allocations and Development Policies DPD.

However, United Utilities wishes to emphasise that in considering the detailed guidance regarding new development within these major utility sites in the Green Belt, it is essential that any future policy facilitates any necessary utility development at key utility sites to ensure the flexible delivery of infrastructure which, in turn, enables the delivery of development to meet the needs of the wider Borough.

It is also worth noting that the redevelopment of existing sites in the Green Belt can often be in isolated locations where infrastructure is limited. As such it may be necessary to coordinate the delivery of redevelopment with infrastructure upgrades.

## **Policy SUE 2: Sustainable Urban Extensions – Development Principles**

United Utilities wishes to support criterion 1b) of Policy SUE 2 which emphasises that the Sustainable Urban Extensions must demonstrate a comprehensive approach to site development and infrastructure provision.

With respect to Section 3) of this policy, dealing with site specific requirements, we support the addition of text requiring the preparation of a Supplementary Planning Document for each SUE, *"which will provide a proposed spatial framework for the site together with further details of development and infrastructure requirements"*.

With regards to Section 4) of this policy, United Utilities recommends that there is a need to ensure the Sustainable Urban Extensions are delivered in accordance with a comprehensive strategy for drainage infrastructure. Therefore we suggest the following amendment (highlighted in red) to the wording of the policy:

*"Proposals for development within each of these locations will only be granted planning permission where they are consistent with a single detailed master plan, including a comprehensive drainage strategy, for the whole of the Sustainable Urban Extension which is approved by the Council. The master plan should accord with development plan policy and any associated Supplementary Planning Document and may be submitted prior to or with the application. Planning permissions must be linked to any necessary legal agreements for the improvement, provision, management and maintenance of infrastructure, services and facilities, open spaces and other matters necessary to make the development acceptable and which facilitate comprehensive delivery of all phases of development within the Sustainable Urban Extension in accordance with the single detailed master plan."*

United Utilities notes that some of the Sustainable Urban Extensions are made up of numerous parcels of land in different ownerships. Our experience from dealing with other strategic development sites is that following allocation and adoption, applications are pursued in advance of the preparation of master plans and independently of other landowners, thus rendering an approach to development which is not comprehensive. This therefore results in the delivery of development which is not the most sustainable. Whilst acknowledging the challenges of the need to deliver development, it is very important to ensure that infrastructure is delivered as part of a comprehensive site wide strategy. It is more appropriate and sustainable if each development parcel is delivered in accordance with site wide infrastructure strategies for the entirety of each allocation.

United Utilities wishes to highlight the difficulties which it has observed in the delivery of coordinated approaches to strategic sites between different landowners. On those sites which are in fragmented land ownership, United Utilities would encourage the Council to challenge landowners to demonstrate clearly how they will work together to deliver a coordinated approach to the delivery of sustainable development. It is most appropriate and effective to have this question resolved in advance of allocation and in advance of adoption of the plan. Many of the strategic sites may necessitate a need for upfront investment in infrastructure. In the absence of clear partnership agreements between landowners, it may be very difficult to secure a mechanism to fairly forward fund the delivery of upfront infrastructure. Development can be most appropriately and sustainably delivered if it is clear that landowners on sites where ownership is fragmented will work together as part of a cohesive site wide strategy. This is a key factor in considering the deliverability of sites in the most sustainable manner.

### **Paragraph 9.7A – Sustainable Construction**

United Utilities acknowledges the **Government's intention to abolish the Code for Sustainable Homes** as a result of its **'Housing Standards Review' consultation**. Whilst some aspects of sustainable design are expected to be covered by future updates to Building Regulations, we recognise that the details of these changes have yet to be confirmed. On this basis, we support the inclusion of new Paragraph 9.7A which states that the Council will consider the need for some aspects of sustainable design guidance, which is likely to relate to aspects not covered within the updated Building Regulations, to be defined by local policies in the emerging Site Allocations and Development Management DPD.

In particular, we would like to emphasise the importance of incorporating water efficiency measures as part of the design process for all new developments. There are a number of methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater recycling for example. Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for treatment and pumping of both clean and wastewater.

### **Summary**

We trust the above comments will be afforded due consideration by the Council in the preparation of its Local Plan: Core Strategy. United Utilities would welcome the opportunity to meet with Knowsley Council to discuss our response in detail.

In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me.

Yours faithfully

Jenny Hope  
Developer Services & Planning  
United Utilities PLC



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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#### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	JOAN FITZGERALD	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref  Policy Ref  Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

By taking away the green belt land for urban extension will cause severe harm to the area and the farming land around it.  
It will create more traffic congestion on our roads which will be potentially dangerous for young and old alike.  
It will affect the wildlife and plant life of the area as it encroaches on our countryside.

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 Oct 16 2014.
- \* Take into account O.N.S 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.

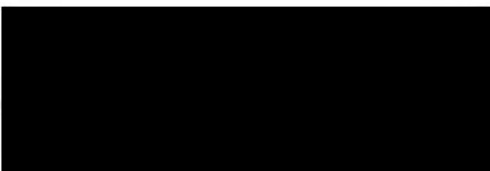
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

11/11/2014.

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

**PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	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		

*\*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 JOANNE SAUNDERSON

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref KGBS14 Paragraph Ref EC2

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input 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 <sup>of Whiston</sup>
- local services such as GP's etc will be overloaded.
- It will have a massive impact on noise and disturbance through <sup>more</sup> 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...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

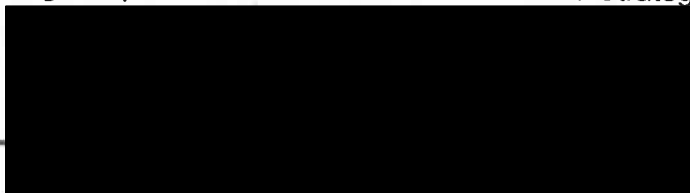
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Signature



Date

1.11.14

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 Prescott 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 24<sup>th</sup> 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,

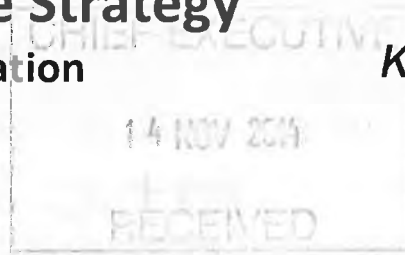
Johanna Robinson



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



### RETURNING THIS FORM

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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

KCBS14

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 & Bruna 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.

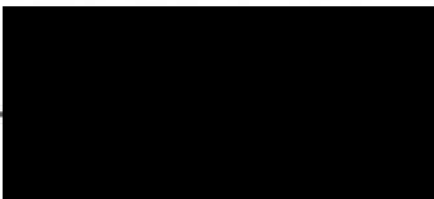
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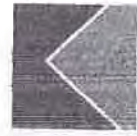
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Date

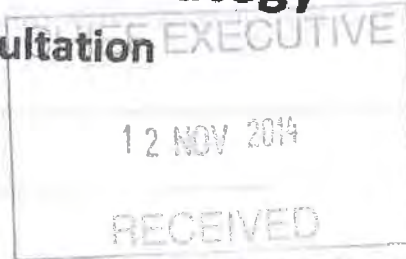
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Knowsley Council

# Knowsley Local Plan: Core Strategy

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JOHN JONES	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## PART B – YOUR REPRESENTATIONS

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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

KGBS14

Paragraph Ref

E 1

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Residents will no longer have access to the natural environment.

Release of south whiston greenbelt will contradict the purpose of green belt "to retain attractive landscapes."

Without sufficient connectivity of green corridors the isolate patches of greenbelt will biodiversity and environment quality.

Continue on a separate sheet if necessary...



4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Develop all Brown Field sites, Before  
considering any greenbelt:

*Continue on a separate sheet if necessary...*

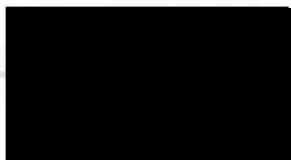
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Signature



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	
Name	John Small	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	email	

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## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

John and Margaret Small – residents of the Borough

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

MOO 1

Policy Ref

1

Paragraph Ref

1.3

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) Yes | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) No              | <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 proposed bringing forward of the release of green belt land within the document is unnecessary and not sound given the amount of brown field sites still undeveloped within the borough.

*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 inclusion of brown field sites within the area should be shown to enable comparison for cost and feasibility to be gauged by all stakeholders.

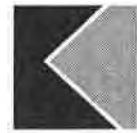
*Continue on a separate sheet if necessary...*

**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 Agreed

**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.



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

13 NOV 2014

RECEIVED

### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JOHN WEBSTER (SENIOR)	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

JOHN WEBSTER (SENIOR)

### 1. To which proposed modification to the Core Strategy does this representation relate?

EDEN MURST AVE GREEN SPACE SPORTSFIELD SITE

Modification Ref

M168

Policy Ref

Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes

No

a) Legally Compliant? (see guidance note 2.2)

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.

#### REJECTION OF MODIFICATION

COUNCIL NOT CONSULTED WIDELY ENOUGH. THE CONSULTATION WAS EXTENDED ONLY 200MTRS FROM THE SITE WITH COUNCIL LETTER DROP, MEANING 80% OF THE BOWRING PARK ESTATE ARE IGNORANT OF IT! THEREFORE IT IS NOT A LEGALLY COMPLIANT CONSULTATION.

~~RE~~ MORE OVER THE SITE NOTICES ARE NOT SEEN BY VEHICLE USERS AS THE ENTRANCE/EXIT TO THE ESTATE IS TO THE NORTH – IN THE OPPOSITE DIRECTION TOWARDS THE M62 MOTORWAY AND BOWRING PARK ROAD.

NO PUBLIC MEETINGS HAVE BEEN ARRANGED BY OUR ONE PARTY TOTALITARIAN COUNCIL AND JUST AS MEMBERS DID NOT ATTEND THE PUBLIC HEARINGS TO DEFEND RESIDENTS INTERESTS NEITHER DID THEY ATTEND THE ONE 'LOCAL DROP IN' EVENT IN COURT KEY PARK WHICH WAS ARRANGED NOT AS A Q AND A FORUM BUT AS A FREE FOR ALL, PUZZLEMENT.

WE HAVE EXPRESSED OUR VIEWS IN UNANIMITY IN THE 2006 U.D.P. CONSULTATION AND OVER THE YEARS REPEATEDLY. WE ~~REPEATEDLY~~ RELY ON THE INTEGRITY OF OFFICERS AND MEMBERS TO ENDORSE OUR WISHES RESULTING IN THE 2006 U.D.P. NOT BEING COUNTERMANDED.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I OBJECT TO THE MODIFICATION BECAUSE IT IS NOT CONSISTENT WITH NATIONAL POLICY AS EXPRESSED BY LOCAL COMMUNITIES SECRETARY OF STATE MR PICKLES 4/10/14 DAILY TELEGRAPH IN HIS NEW PLANNING GUIDELINES 'PROTECTING OUR GREENBELT MUST BE PARAMOUNT' AND 'THAT GREENBELT BOUNDARIES SHOULD ONLY BE ALTERED IN EXCEPTIONAL CIRCUMSTANCES.' THIS CLARITY OF ENLIGHTENED GOVERNMENT POLICY MEANS A REVIEW OF OUR SMALL SPORTSFIELD SITE IS THEREFORE VERY NECESSARY, AS THE PLAN CAN BE MADE TO WORK WITHOUT ITS INCLUSION AND RESULTANT NEGATIVE IMPACT ON THE COMMUNITY AND LOCALITY

QUOTE N.P.P.F. SECTION 9 THE CONSTRUCTION OF NEW BUILDING ON GREENBELT LAND IS CONSIDERED 'INAPPROPRIATE' AS IT WOULD SEAL THE GAP BY ENCOURAGING URBAN/SUBURBAN RESIDENTIAL SPRAWL BETWEEN THE ANCIENT DOOMSDAY TOWNS OF CHILDWALL AND HUXTON WITH ROBY.

I WANT THE IMPORTANT NEW GREEN SPACE STRATEGY OF K.M.B.C 14/6/14 TO BE IMPLEMENTED IN PROTECTING THIS PRIORITY HABITAT OF NATURAL ENVIRONMENTAL VALUE 'RECOGNISED AS AN IMPORTANT LOCAL COMMUNITY AMENITY AND 'THUS RETAINED IN GREENBELT FOR FUTURE GENERATIONS TO ENJOY.'

*(Continue on a separate sheet if necessary...)*

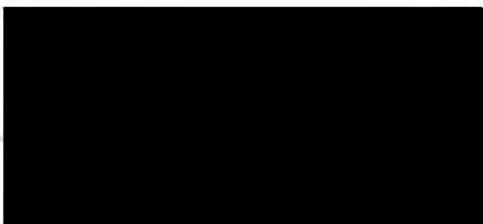
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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing   
*DUE TO MY PHYSICAL CONDITION AND AGE.*
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

5/11/14



# Knowsley 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	JOSEPH TODD	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

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 Council

# Knowsley Plan: Strategy

## Local Core



Knowsley Council

## 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	Miss	
Name	Julie Anne Parker	
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          J A Parker

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref    M088                      Policy Ref KGBS 17                      Paragraph Ref 5.46A

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
a) Legally Compliant? (see guidance note 2.2)		
b) Sound? (see guidance note 2.3)		✓

### **3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

SA

In the Infrastructure and development options study completed by Mott MacDonald 8/7/2014 relative to “ South Whiston and land south of the M62”.  
The assessment is not sound as information is not factual.

#### Table 5.3 SWOT Analysis

Kings Business Park is almost full and Knowsley requires a successor B1 office Park'.....  
There are 10 vacant units. This statement is not sound as there are a number of empty office units currently available on Kings Business Park and the landowners Commercial Property Developments have an option to increase the development of the business park for b1 use to the north of the site. I have attached an ariel view of the business park which demonstrates that the business park has potential to double in size – there are a number of planning documents available that support this application.

5.46A In the context of employment land, Green Belt release is required specifically to address Knowsley's overall development requirements up to 2028 and beyond. The immediate release of Sustainable Urban Extensions is necessary to provide an improved range, choice and quality of sites to address specific employment needs. These include provision for a high quality business park (as a successor to Kings Business Park, which is almost fully developed) and large scale distribution and

Logistics centre.

Mr Pike, can you take into consideration the 'level of need' for further business parks when there are a number of empty units for multiple uses available on Huyton Business Park, Whiston Business Park on Fallows Way and Kings Business Park in Prescot all within a 3 mile radius of the proposed SUE of Whiston south greenbelt.

Please also note the historically low attainment figures and aspiration of school leavers and Knowsley Councils ability to deliver the Local Plan based on the consistent failings of Local Authority services in Knowsley,

Notably;

ONS area of Indices of Multiple Deprivation

Knowsley has returned £18 million of much needed and unspent funding

Childrens services in special measures

Low attainment levels in Knowsley schools

The failure to deliver North Huyton Communities Future redevelopment programme effectively – there is little visible regeneration in this area, despite the first phase of a housing development being completed. The Centre for Learning school in this area closed within 2 years due to under subscription, the community centre is considerably under used and there is little synergy between the newly built community of 250 families and the existing community which has directly impacted upon crime and increased void properties in this area.

I also stress that I first received correspondence relative to the local plan in September 2014 and feel that I have been excluded from consultation, I feel that there is not a robust evidence base to justify the early release of greenbelt and ask you to extend the period of consultation.

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

In the Local Plan M0157 Para 6.45 should delete the words “, and SUE 2c “Sustainable Urban Extensions - South Whiston and Land to the South of the M62”) and necessarily the links and other references consequent throughout .

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

a) Yes, I wish to participate at any further public hearing

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Signature



Date 14/11/2014



A57

A57

2

Dulson Way

Kings Dr

Huyton Ln

A

**TOWN AND COUNTRY PLANNING ACT 1990**

**SITE ADDRESS:** 16-21 Lion Court, Kings Drive, Kings Business Park, Prescot, Knowsley. L34 1EN

**DESCRIPTION OF DEVELOPMENT:** APPLICATION TO VARY CONDITION NO'S. 8 & 9 ATTACHED TO PLANNING PERMISSION 07/00746/FUL (ERECTION OF 6 NO. TWO STOREY OFFICES WITH ASSOCIATED CAR PARKING AND LANDSCAPING) TO ALLOW FOR DETAILS RELATING TO THE EMERGENCY ACCESS FACILITY & PEDESTRIAN ACCESS TO HUYTON LANE TO BE SUBMITTED PRIOR TO THE COMPLETION OF UNITS 17-21 AND NOT ON COMMENCEMENT OF DEVELOPMENT (UNIT 16 CONSTRUCTED ONLY, 17-21 NOT COMMENCED TO DATE).

**APPLICATION REFERENCE:** 13/00283/FUL

**APPELLANT'S NAME:** Commercial Development Projects Ltd

**APPEAL REFERENCE:** 13/00283/FUL/13/230-250-8

**APPEAL START DATE:** 31 July 2013



A damning report into children's services in [Knowsley](#) said "widespread failures" were putting vulnerable children at risk.

Education watchdog Ofsted today branded Knowsley Council "inadequate" following an inspection of its services for children in need of help and protection, looked after children and those leaving care.

A review of the effectiveness of Knowsley's Safeguarding Children Board also concluded its performance was inadequate.

Inspectors said the council had a high turnover of social workers in assessment and safeguarding teams - and inexperienced staff were carrying out visits to children.

Ofsted's report said there were "significant weaknesses" in management, with a history of "infrequent and poor supervision" of social work staff. It said there had been improvements, but quality remained low.

Inspectors found record keeping was variable and often poor across social work teams. They said it was taking too long for children in care to be placed for adoption when it was in their best interest.

The report said: "Widespread failures and inconsistent practice across help and protection services leave some children and young people at risk of suffering harm.

"Too many children and young people who need help and support or who need to be cared for by the local authority experience drift and delay.

"Some have been left for too long in situations where they have suffered harm."

The report, published today, follows an inspection carried out at the end of April and beginning of May.

The report said senior council officers were aware of "significant deficits" in its services for children and families and an improvement plan had been drawn up - but it was too early to see any significant impact.

It read: "The local authority is aware of these weaknesses, and has developed an improvement plan.

"Recently appointed senior managers know what they need to do to improve the quality of practice and services for children and young people in Knowsley.

"However, remedial action is still at an early stage and significant impact is not yet evident in day to day practice."



## New Deal for Communities

NHCF is the successor organisation to a central government funded programme known as New Deal for Communities (NDC).

This programme ran in Knowsley from 2001-2011 when the North Huyton area was awarded £55.8m to regenerate the area through a partnership board of local residents, ward councillors and agency representatives.

The funding was spread across 7 main themes in North Huyton: Health, Education, Crime, Employment, Housing, Youth and Community.

Over the 10 years, some 200 plus projects were commissioned by the independent Board to improve the performance of the area in comparison to the rest of the borough and elsewhere. This was achieved using a variety of in house and external delivery agents.

The North Huyton programme was rated as one of the leading NDC programmes in the country achieving 'excellent' status through the government's performance management framework.

Besides a comprehensive revenue based change programme, the Board also contributed to a number of key new build capital projects in the area including:

- 2 new Learning Centres
- Primary Care Trust Resource Centre
- Training and Skills Centre
- Youth Centre
- Community Centre





# Councillor's anger as £18m of unspent funding businesses handed back to the Government

Oct 05, 2014 08:00

By [REDACTED]

Liverpool council cabinet member for skills [REDACTED] said the situation wasn't good enough



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[REDACTED] in front of the Forever 21 store and the Lobster Pot fish and chip shop on Whitechapel, Liverpool city centre. Picture [REDACTED]

UP TO £18m of funding meant to help local firms and workers was given back to the government by a Merseyside council after it went unspent.

The cash, which was to be spent across the region, was being handled by Knowsley

## **Improvement Notice**

---

To: NAME Knowsley Metropolitan Borough Council (“the Council”)  
ADDRESS Archway Road, Knowsley L36 9YU

**This Improvement Notice is issued to Knowsley Metropolitan Borough Council on 16 September 2014 following the findings of inadequate performance and arrangements for ‘children who need help and protection’, for ‘adoption performance’ ‘leadership, management and governance’, and for ‘effectiveness of the Local Safeguarding Children Board’ as identified in the Ofsted inspection report published 30 June 2014.**

1. This Notice is given to address all the areas for improvement identified in the report of the inspection of services for children in need of help and protection, children looked after and care leavers and review of the effectiveness of the local safeguarding children board published by Ofsted on 30 June 2014.
2. To comply with this Notice, the following actions are required of the Council, working with its partner agencies (“partners”) as identified by the Children Act 2004 (section 11), with clear evidence of improvement:

### **Understanding needs of children, young people and families**

3. **Ensure that the needs of children and young people in Knowsley are reviewed and there is a clear statement of what children and young people can expect from services provided by social care and partners** by:
  - a. reviewing the Joint Strategic Needs Analysis and communicating a shared understanding of strategic priorities to staff and partners; with a clear focus on vulnerable groups who would benefit from help and protection, care and adoption.
  - b. setting out a process map of the children and family journey through the system including key transition points and target performance indicators;
  - c. ensuring the views of children and young people, their experiences and needs are gathered to inform individual care plans, the commissioning of services, improvements to services and that there is a system to record and report to the Local Safeguarding Children Board, the Improvement Board and children and families;
  - d. ensuring that children and young people are seen alone during statutory visits and their views recorded;

- e. ensuring social worker's report on child protection are shared with the family 24hrs before conferences; and
- f. ensuring that children and young people are provided with information about entitlements and how to complain.

### **Leadership, Management and Governance**

4. **Ensure the Council sets out a statement of their vision and ambition** for children's services and an improvement plan ('the Improvement Plan') which sets clear objectives, timescales, outcomes and is supported by a data set including qualitative and quantitative information against performance indicators by 6 October 2014. Consideration should be given to, but not limited by, the *Children's Safeguarding Performance Information Framework 2012*. The statement and Improvement Plan should be communicated to and implemented by all staff including those in partner agencies. The Improvement Board ('the Board') is accountable for delivering the Improvement Plan.
5. **Ensure leadership, scrutiny and challenge is exercised** and impacts on the quality and effectiveness of safeguarding and looked after children services. By ensuring that:
  - a. effective assurance arrangements are in place within the Council and across the partnership in line with Department for Education (DfE) statutory guidance '*Roles and responsibilities of the Director of Children's Services and the Lead Member for Children Services*' and '*Working Together to Safeguard Children*';
  - b. elected members of the Council understand and deliver their corporate parent role for looked after children and meet all the statutory requirements, including statutory visits;
  - c. the lead member is supported by an experienced peer with a successful track record of providing political leadership in a Council that has gone through significant improvement following an inspection;
  - d. Council senior managers continue to consult staff and partners on the changes necessary to secure improved children services and that there is sufficient capacity to enable senior managers to implement the improvement activity and measure impact;
  - e. a culture of accountability is developed with managers, staff and partners holding each other to account with action taken when required to challenge poor and unacceptable performance; and
  - f. children's social care is represented on all key planning forums such as the Health and Wellbeing Board.

### **Early Help and Partnership Working**

6. **Implement a prevention and early intervention strategy to provide children, young people and families appropriate support from early help to statutory intervention** by:
  - a. setting clear expectations that partners in health and the police play

- a full and active role in the identification and support of those who need early help and protection;
- b. developing and agreeing a local protocol for early assessment as set out in *Working Together to Safeguard Children* so all partners are able to respond to early needs and involve others as required;
- c. reviewing and monitoring the understanding, use of thresholds and criteria, and referral routes (including the take-up of CAF) by different partners;
- d. monitoring referral/re-referral rates and feedback from referrers;
- e. commissioning targeted services with partners with mechanisms for step-up/step-down between early help and statutory social care to ensure appropriate support and shared case leads across partners; and
- f. monitoring the contributions to, the use and impact of early help as made by all partners and to regularly report to the Board on this with recommendations to improve practice.

### **Quality and effectiveness of Practice**

#### **7. Improve the quality, timeliness and consistency of children's social care assessments** by ensuring that:

- a. all assessments by the Council and partners follow the principles and parameters of a good assessment and are completed within timescales as stated in *Working Together to Safeguard Children*;
- b. all protocols are agreed and monitored and ensure information is shared in a timely fashion e.g. after key planning meetings where decisions are taken; and
- c. evidence, rationale and decision making for assessments are timely in being recorded.

#### **8. Improve the quality, delivery and management of child protection practice and plans** by ensuring that:

- a. all partners attend child protection meetings and strategy meetings and this is escalated and addressed when not occurring;
- b. child protection plans comply with the requirements of *Working Together to Safeguard Children* including ensuring that all plans include the views of the child, time bound actions, with assigned 'owners', and with measurable, success outcomes for children and young people;
- c. plans include review and evaluation points, with timescales agreed with other professionals along with information about their contributions;
- d. scrutiny, challenge and capability of Child Protection Conference Chairs is improved by having regard to statutory guidance;
- e. case records are regularly updated, in a timely fashion, to document any new or amended information, rationale and decisions as they arise; and
- f. evidence of management oversight, decision making and

appropriate action and chronologies, is set out in detail on each case file.

**9. Ensure robust permanency, care planning and review of looked after children at the earliest point by :**

- a. improving matching processes to ensure that the needs of children requiring long term placements are met;
- b. implementing a care planning tracker that is subject to regular review;
- c. clear systems are in place to ensure concurrent and parallel planning for children entering care;
- d. reviewing the procedures of the Independent Reviewing Officers to adhere to statutory guidance and to tackle any delays to the timescales set out in plans;
- e. ensuring there are sufficient foster carers and residential placements to respond to the needs of looked after children; and
- f. monitoring the educational achievement of looked after children against clear targets.

**10. Improve the timeliness of adoptions by ensuring that:**

- a. clear plans are in place to improve all aspects of adoption timeliness (local authority decision-making, placement orders, matching and placement);
- b. measures are taken to build on the introduction of recent new processes to address delays including the production of robust performance management information; and
- c. performance management information and a trajectory of likely impact on DfE's adoption scorecard indicators is reported and reviewed by the Board as part of the data set in paragraph 4.

**Quality assurance, audit and management oversight**

**11. Ensure there is a robust and effective quality assurance framework to drive** and evidence the impact of improvement with families, front line practitioners and key partner agencies that:

- a. uses quantitative and qualitative evidence, with a view to the effectiveness of practice and the degree to which it is safe;
- b. includes regular auditing arrangements of case files, with use of independent arrangements to review the quality and timeliness of recording and compliance in individual case records (as set out in *Working Together to Safeguard Children*);
- c. there is an agreed regular and planned approach (including the size and scope of audits), to update the Board on audit findings and analysis, along with recommendations to improve practice, which should also inform the work of the LSCB; and
- d. ensures recommendations and actions are measurable, inform improvements in practice, workforce development and supervision.

**12. Establish effective supervision and management oversight by**

ensuring that:

- a. all staff continue to have regular supervision;
- b. that supervision is reflective to promote learning, in line with agreed protocols, with training available for supervisors;
- c. social worker responsibilities and workloads are defined and reviewed with a range of work for staff consistent with their level of experience and competence (including protected caseloads for Newly Qualified Social Workers); and
- d. all management oversight (such as case discussion, supervision and audit) is conducted in line with standards set out in *Working Together to Safeguard Children* to ensure safe practice and decision making on individual child protection cases.

### **Staff capability and capacity**

13. Develop a **workforce strategy** which is based upon an analysis of need. The workforce strategy must include clear recruitment and retention strategies, set out how poor performance and capability issues will be dealt with and an analysis of skills and training needs required to deliver good social work. It should be implicitly linked to the Improvement Plan, and clearly related to service plans and audit outcomes. The strategy should be aimed initially at reducing the dependency on agency staff and should include:

- a. support for newly qualified social workers is reviewed to ensure that it meets need and results in them becoming advocates for the service in Knowsley;
- b. a review of, and improvement to, tools and systems required to deliver good and agile social work including the electronic information system; and
- c. staff engagement and regular feedback to improve and shape practice using feedback mechanisms, such as staff surveys and report the results to the Improvement Board.

### **Local Safeguarding Children's Board (LSCB)**

14. **Strengthen the LSCB so it can ensure that partners work together effectively and are held to account for their responsibilities** by ensuring that:

- a. there is action to improve the effectiveness of the LSCB, to ensure its compliance with the requirements of *Working Together to Safeguard Children* and that partners are fulfilling their obligations under section 11 of the Children Act 2004;
- b. multi-agency practice and individual partner audits are robust, with reporting to the Improvement Board on any key lessons and recommendations to improve practice;
- c. all partners are committed a shared set of priorities for safeguarding, child protection, and early help/intervention and



- prevention;
- d. all policies and training are reviewed and delivered to ensure understanding of thresholds in all agencies;
  - e. the LSCB learns from national lessons of serious case reviews and from LSCBs where effectiveness is considered good or outstanding; and
  - f. the chair of the LSCB reports progress to the Improvement Board meeting to inform the Improvement Board Chair's report to the Minister.

**15. Taking account of the measures set out in this Improvement Notice the Council is expected to:**

- a. Establish an Improvement Board ('the Board') and appoint an Independent Chair ("the Chair"). The Board is expected to meet at least every 6 weeks. If in the future the Improvement Board wishes to vary the frequency of meetings this must first be agreed by the Department for Education. An official from the Department for Education will attend board meetings as a 'participant observer'. The Board should include key partner agencies in its membership. The Council must provide the Chair with administrative support to a level sufficient for the Chair to undertake his/her role efficiently and for the Board to operate effectively. This to include provision to allow, at least 2 days every month for independent testing and validation.(either by the Chair directly or an independently appointed person on behalf of the Chair).
- b. The Council must develop an Improvement Plan by 6 October 2014 aimed at delivering improvements. The content of the Improvement Plan and a record of progress must be kept up to date. The Council must report to the Board on progress against the objectives in the plan and can commission updates from partners in order to do this. Reporting should include analysis and recommendations supported by reviewing performance trends against key data sets (which partners should agree) including quality of service and outcomes for children and young people. The Council should highlight those objectives which are slow to progress and highlight where contributions need to be strengthened.

**16. The Council should aim for actions included in the Improvement Plan to be delivered within 18 months of the Ofsted inspection.** The objectives and performance trends will form part of the discussion at formal review meetings with the Department for Education.

**Improvement against the above measures will be assessed as follows:**

- 17. The Improvement Board Chair must provide to the Parliamentary Under Secretary of State for Children and Families a written progress report against the areas set out in this Notice by December 2014 and every three improvement boards thereafter. The Chair's report should be based on

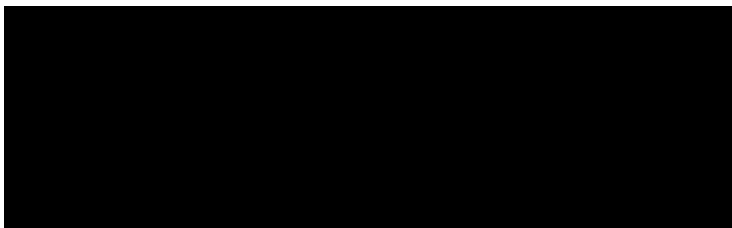
independent testing and validation of improvements.

18. In parallel, the LSCB Chair should also report to the Improvement Board meeting on progress to improve its effectiveness.
19. Progress reviews will be conducted by DfE officials and take place every six months until this notice is lifted, or at the specific request of the Department. Prior to the review, any Improvement Board Chair's report for that period will be supplemented by a Council report of progress against the improvement plan submitted to DfE a week in advance of the review. Such reviews may result in an amendment to this Improvement Notice and further action being required.

**Failure to comply with this Improvement Notice by the assessment dates or poor progress:**

20. Should the Council be unwilling or unable to comply with this Improvement Notice, or should ministers not be satisfied with the Council's progress at any stage, ministers may choose to invoke their statutory powers of intervention (s497A Education Act 1996) to direct the Council to enter into an appropriate arrangement to secure the improvements required in children's services.

Signed on behalf of the Secretary of State



Dated : 16 September 2014



*Knowsley Council*

KNOWing the value of  
Consultation

# **North Huyton Action Area Supplementary Planning Document**

Knowsley Metropolitan Borough Council

February 2007

**(Copy of Document PP05 provided)**



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council

CHIEF EXECUTIVE

12 NOV 2014

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Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	June Anders	
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

KG B514

Policy Ref

--

Paragraph Ref

E3

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

- more traffic increased a potential more road accidents.
  - more pollution.
  - more likely to be an increase in the proportion of rain falling in heavy storms.
  - The re-use of land should be promoted to minimise the take up of greenfield land, which we have not got a lot of.
  - We need to maintain the economy and wildlife for the future generations.
  - impact of the local quality of water in the area.
  - Local residents use Big lake for recreation & fishing regularly. We need our Green fields.
- Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

my grandchildren planted tree's on one of the sites, and we regularly go to see how they are growing. It is part of their history.  
Save our green fields.

*Continue on a separate sheet if necessary...*

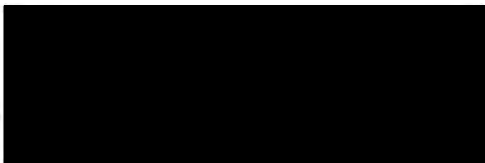
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date

1-11-2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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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 KAREN EASTON	
Name		
Job Title (if appropriate)	BANK CLERK	
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 have used Whiston greenbelt Land Daily for recreation purposes for the last 28 years. It is my belief that this is not sound because it will impact on my life in a negative way. I do believe that this proposal is against my human rights.

*Continue on a separate sheet if necessary*

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

This goes against the government and contradicts the statement by Mr Piddes that greenbelt land should not be released. I feel that the Inspector should not agree to the release of greenbelt land. Au Brown belt land should be fully utilised.

*Continue on a separate sheet if necessary*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



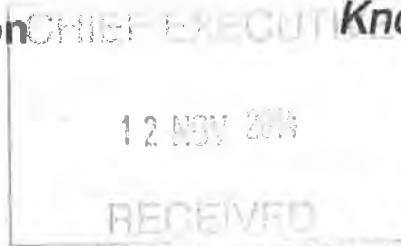
Date

1/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	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.*

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**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)**

- a) Legally Compliant? (see guidance note 2.2)
- b) Sound? (see guidance note 2.3)

Yes

No

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

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)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1.11.14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE Knowsley Council

12 NOV 2014

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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	miss	
Name	Katy Andrews	
Job Title (if appropriate)	Banking customer relations manager	
Organisation (if appropriate)	Barclays	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Katy Andrews

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KG B514

Paragraph Ref

EC3

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

There is no evidence this development will bring employment to the area that is why I feel this proposed modification is not sound.

There's nothing to say local firms will be used for the construction, either

creating any further shopping outlets will also damage the local business causing further unemployment.

Continue on a separate sheet if necessary...



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Allow brown belt land to be developed before considering the sale of Greenbelt.

Take into consideration the information given by Eric Pickles about Greenbelt land.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

11/11/14



Knowsley Council

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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 DAW	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

positive preparation - infrastructure  
- roads would be congested.  
- Health + safety compromised.

justified - use brownfield areas first  
- most smaller brownfield areas have road infrastructure in place  
- less overall effect on traffic  
- improve local communities by regenerating unused local areas

effective - overcrowding the area - roads  
- no access on Bypass - major safety risks

proposal - use Brownfield areas FIRST  
- Scotchbarn lane - school, Bicc, swimming baths  
- old Bicc site *Continue on a separate sheet if necessary...* Spaces  
- decline Home + Bargain new store  
we don't need more big shops - use Prescot town  
- use this space for needed housing

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I strongly object to the removal of GREENBELT areas for the Government to sell over protected Greenbelt areas to property developers for massive amounts of money and profits just to build houses when there are lots of brownfield sites still available.  
It is logical to use brownfield areas for new houses and keep the protected Greenbelt areas for the local environment

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change

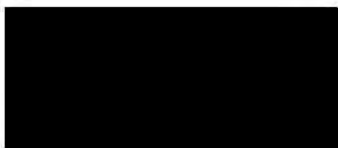
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

13-11-14

# 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	Keith Forston	
Job Title (if appropriate)	Apprentice Engineer	
Organisation (if appropriate)	Heroux Devtek	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

I do not believe this proposal is sound. I use the Green belt Land everyday for recreational use. I will not be able to continue to use the land if this proposal goes ahead. I cannot see any viable alternative land to continue my hobbies.

I think this will be detrimental to my health and mental well being.

Continue on a separate sheet if necessary...



4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

This goes against Government guidelines which state that Greenbelt Land must only be used as a last resort.

The Greenbelt Land in question is not unused Land. It is being utilised by the community. There is plenty of brownfield Land available to use.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

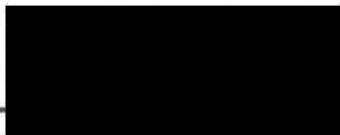
5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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



Keith Kennedy



14<sup>th</sup> November 2014

Local Plan Team,  
Knowles Council,  
1st Floor Annexed,  
Municipal Buildings,  
Archway Road, Huston, L36 9YU.

Dear Martin Pike

Re KNOWSLEY LOCAL PLAN-PUBLIC CONSULTATION – HALEWOOD EAST

**NOTE 1 - request for a review of the Local Plan because of the following issues:**

(A) There is currently new evidence/guidance/best practice that was previously not available to the hearings or consultations of the Local Plan:

- i. DEFRA - March 2014 Defra release Category 4 Screening Levels (C4SLs) as part of the growth agenda by removing excessive cost burdens for housing developers. 3 years ago Defra promised that £132m in savings will come about as a result of the reforms to the statutory guidance on contaminated land. Those reforms, says the report, “will avoid costly unnecessary remediation operations and focus attention on high risk sites, potentially saving business an estimated £132m a year”. Therefore, brownfield sites that were previously

discounted by the Inspector due to slow release should be released more swiftly. Knowsley Council should now encourage the release of brownfield sites as a result, March 2014.

- ii. DCLG - New rules further strengthen green belt protections 16/10/14.
- iii. Eric Pickles - Councils must protect our precious green belt land 06/10/14, and It is now easier to bring vacant and underused public land back into use through the Community Right to Reclaim Land 24/10/14.
- iv. Brandon Lewis - Development on the Green Belt 11/08/14.
- v. DCLG – Consultation on proposed changes to planning policy and guidance, ensuring fairness in the planning system, and strengthening protection of the green belt and countryside 14/09/14.
- vi. DCLG - Brownfield sites to be prioritised for development 28/10/14.
- vii. DCLG - Since January 2014 a new Right to Contest has enabled the public to challenge the government about land and property they feel could be put to better use, and ask for it to be sold 08/01/14, Government initiatives to help build more new homes on brownfield land 13/06/14, £5 million fund will unlock 100 brownfield sites for new homes 07/08/14, Bidding opens for £200 million to build homes on brownfield land 13/08/14, The government has announced plans to create 30 housing zones on brownfield sites across the country to increase housing supply 22/10/14.
- viii. Land held by Homes and Communities Agency (HCA) and other major land holding departments has been sold with capacity for over 76,000 homes 31/03/14.
- ix. CPRE – Green belt development is “not the path to economic growth 27/08/12.
- x. Nick Boles MP - inspectors in Local Plan examinations should continue to determine whether local planning authorities have followed NPPF in seeking to meet the objectively assessed development needs of their area 18/03/14.
- xi. Nick Boles MP – shortfall in housing does not constitute “exceptional circumstances” 18/03/14).
- xii. The Guardian (Simon Jenkins) – “Housing crisis? No, just a very British sickness” states that building on green belt "wastes energy and infrastructure, it promotes commuting and destroys a dwindling environment. Housing "need" is in cities, where labour mobility and immigration are high and most poor people find work". Knowsley Council doesn't need to build more houses; this "need" is based on crude household formation, with no reference to

demand, price, migration or anything else. Danny Dorling (Professor/author) concludes, "We cannot build our way out of the disaster of our current housing system." We should rather tackle "how to better share and look after what we have already got" 21/05/14.

xiii. Letter from the Leader of the Council, Councillor R.J.Round, about financial strains on the Borough due to the Local Plan, October 2014.

(B) Additionally, there should be a review as there are currently numerous new community groups that were not previously involved in the consultation.

### **NOTE 2 – additional reasons for objection to Local Plan**

(A) Knowsley Council should adhere to its own "Statement of Community Involvement" document. Section 4.6 "community involvement that is more than a box ticking exercise will require an ongoing commitment". Table 5.1. "respecting peoples involvement". Table 6.1. "potential measures to engage hard to reach groups".

Hence the LOCAL PLAN is unsound on the basis of the failure of the Council to carry out adequate consultation with the wider public. In particular the policies outlined Doc CS08c M049-65 Policy Ref CS1-CS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: p51: M168 (Doc CS08c: P51) new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC. The Council should therefore consider re-convening the public consultation process to take note of the views of local residents and the numerous new community groups (NOTE 1, (B) above).

(B) Knowsley Council should adhere to its own policy document "Policy G1: Development within the GreenBelt"

(C) The approach to development in East of Halewood (Policy SUE2b) is not appropriate.

(D) It is also noted that NATIONAL PLANNING POLICY FRAMEWORK (NPPF) requires that GREEN BELT BOUNDARIES once set should be permanent.

(E) With reference to NOTE 1 (A)(vi) (above) priority for development should favour the use of BROWN FIELD SITES. There are figures which suggest that there are significant numbers of unoccupied properties, (2020 properties figures for 2012, Knowsley Local Plan Monitoring Report: para 3.65 p32, and a potential for 5636 dwelling sites available) which together with a view that the housing targets are ambitious rather than realistic, would mean that the housing

target of 8100 could, (2020+5636=7656) be achieved without utilising the GREEN BELT. In addition in the SHLAA Report of 2012: para 8.3, p 30) there is reference to the Borough having 12.6 years of capacity rather than 15 years. It must be a possibility that as the 12.6 years approach the situation regarding available brownfield land may have changed, and/or assess migration/population increase. In this context relating to housing there is no reference to any consultation with any local housing trusts. The other concern relating to the release of land from the GREEN BELT is that development on these sites will be more attractive to developers, (not to mention the capital appreciation of the value of the land following change from GREEN BELT status), so there is thus a real risk that brown field sites will not be developed, and may remain as blighted sites in the Borough, as former GREEN BELT sites are developed preferentially. GREEN BELT land once released and developed is lost forever. Hence the GREEN BELT should be protected as recommended recently by the Secretary of State, ERIC PICKLES, whose views on the use of GREEN BELT land (NOTE 1 (A)(iii) (above) include: "incursions into the GREEN BELT must only occur in exceptional circumstances and must be planned in a logical and strategic way". In Document Hearing Statement 5A from October 2013 there is also reference in para 5.1 to "exceptional circumstances" (NOTE 1 (A) (xi) shortfall in housing does not constitute exceptional circumstances) relating to GREEN BELT and in 5.1.1 the policy is amended to "Inappropriate development will not be permitted in the GREEN BELT unless very special circumstances can be demonstrated, and the visual and recreational amenities of the GREEN BELT will be preserved".

(G) In Policy CS8 (CS09a: para 1&2: p 69) there is reference, for example, to ensuring more attractive and cleaner neighbourhoods, sustaining and promoting biodiversity, preserving the character and function of historic environments and valued landscapes, to provide local opportunities for sport, mitigating the effects of climate change and flood risk, mitigating air, water and noise pollution to protect and enhance strategically important areas of green space, promote effective movement of wildlife through a network of green strategic links. In para 4e (p70) there is reference to the M57 Green Belt corridor as a strategically green link.

Developing on the GREEN BELT will counter to these aims.

Hale wood East is part of this corridor and prevents unrestricted sprawl, prevent merging of neighbouring towns, assist in safeguarding the countryside from encroachment, and preserves

the setting and special character of Halewood. Halewood has historic character and noted in the Domesday Book 1086. Development of the site would therefore be inherently encroaching and harmful to the landscape character.

Please NOTE 1 (A)(iii), the COUNCIL should be minded of the Secretary of State, ERIC PICKLES' views on the use of GREEN BELT land : "incursions into the GREEN BELT must only occur in exceptional circumstances and must be planned in a logical and strategic way". In the context of this statement Mr. Pickles stated that the area in question: BLACKMORE "was an almost unique Essex village of a type that was rapidly disappearing, it unusually retained its medieval road patterns and is nationally renowned for its fine church and its Tudor links. Any development should be sympathetic to the heritage of BLACKMORE". Much of this could be applied to Halewood, which has a long history, development on the site would be detrimental to its visual amenity.

Please NOTE 1 (A)(iv), Planning Minister BRANDON LEWIS is quoted as stating that "We have put Local Plans at the heart of the reformed planning system so councils and LOCAL PEOPLE can now decide where development should and shouldn't go". Hence the COUNCIL should be heeding this latest GOVERNMENT GUIDANCE and taking note of what THE PEOPLE want in terms of GREEN BELT, i.e. that the GREEN BELT should not be sacrificed. Exceptional circumstances do not therefore exist to justify removing land from the GREEN BELT. It is also worthy of note that in a document from the LANDSCAPE INSTITUTION, entitled "PROFITABLE PLACES", there is a chapter heading: "Investment in a high quality landscape pays dividends as customers are willing to pay more for it". It is likely preparation of brownfield sites may be expensive to develop. Hence there is thus the risk that developers will seek to preferentially develop in released GREEN BELT, thus leaving unused brownfield sites still abandoned and unused. The Council should take note that MOLE VALLEY COUNCIL are considering abandoning their "Housing and Traveller Sites Plan REKS20131405C-015" in the light of this new guidance.

(H) In any general consideration of the GREEN BELT, the Council should also be aware of the NATURE AND WELLBEING ACT, which is a piece of legislation to bring about the recovery of

nature in a generation for the benefit of people and wildlife. Reducing the GREEN BELT runs counter to the aims of this Act. There would be additional concern over the effect of removing the sites from the GREEN BELT on traffic, which is likely to increase and thus contribute to affecting adversely the air quality, through gas and particulate emissions, and there would also be a contribution to an increase in CO<sub>2</sub> (i.e. climate change) from the loss of greenery.

(l) Additional to the above, **suitable sites for future residents should not exasperate pre-existing health conditions of current residents.** Increase in subsequent traffic movements/stop and start on small roads with junctions due to any proposed development will contribute to an increase in air pollution and noise pollution. Deaths in Knowsley from respiratory disease and hospital admissions are significantly higher than national and North West rates. Hospital admission rates for asthma have increased by 37% in Knowsley, since 1999/2001 compared with 11% in the North West and 6% in England. And noise pollution, which contributes to increase in poor mental health due to lack of sleep and other subsequent health implications. It is estimated that 12,250 people in the Knowsley experience depression and anxiety each year. Cardiovascular disease is the biggest killer in Knowsley. Deaths from cardiovascular disease are significantly higher in Knowsley in comparison to figures for England (22% higher than the national average). Lung cancer is the single largest cause of cancer deaths in Knowsley. Figures show that during 2004 / 2006, deaths from lung cancer in Knowsley were 81% above that nationally. South Kirkby has significantly more lung cancer deaths compared to the rest of the Borough.

Knowsley should utilise the recommendations from the Joint Strategic Needs Assessment (JSNA) describing the future health, care, wellbeing needs of local communities. Subsequently the Borough is noted as targeting reducing CO<sub>2</sub> emissions by 18% by 2020 against a 2008 baseline. And target reduction of carbon emissions from estate and services by 41% by 2016 against a 2009/10 baseline. **How is this to be achieved with the increase in traffic and energy use from an additional 8100 homes?**

Knowsley should adopt a strategic approach to planning that takes into account other key frameworks and plans – including Health and Wellbeing.

(J) The hedges provide an environment for birds, small mammals have been seen on the site, and bats are also seen and may be roosting in buildings either on the site or close to it. It is noted that KNOWSLEY claims according to items in a display cabinet in the HUYTON ONE STOP SHOP, to be Britain's GREENEST BOROUGH and in addition has 16 GREEN FLAG PARKS. There is also the KNOWSLEY GREEN SPACE STRATEGY, which discusses the benefits of green space especially chapter 5 and paras 6.3a and 7.2.

(K) Please NOTE 1 (A) (xii) in addition there must be concern that if there are any legal proceedings following the LOCAL PLAN, this could produce further financial strains on the Borough, which has to find £34m in savings (letter from the Leader of the Council, Councillor R.J.Round: October 2014)

(L) The DCLG published the NPPF along with the Localism Act, this was intended to give communities a greater say on planning and policy and scrap "top – down targets". The Localism Act allows for the abolition of Regional Spatial Strategies which seek to bulldoze the GREENBELT around our towns and cities across the country.

(M) Final remark about the sites presented in the Knowsley Local Plan as GREENBELT SITES. This will be a deceiving to developers who will purchase the land expecting a greater return than purchasing a brownfield site. Many of the sites presented within the Local Plan are located on or within 250m of a landfill site. Therefore, Knowsley Planning will expect developers to undertake ground gas monitoring and mitigation measures (gas protection membranes) (Knowsley Policy ENV6:Landfill Gas/ Knowsley Policy ENV5: Contaminated Land). Additionally, several of the sites presented in the Local Plan are on Environment Agency flood risk area Level 1 and Environment Agency have advised if houses were built on these areas they would go to Level 2/3.

(N) I wish to indicate that I would wish to have the opportunity to participate in in any Public Hearing.

Please acknowledge receipt of this document.

Regards Keith Kennedy

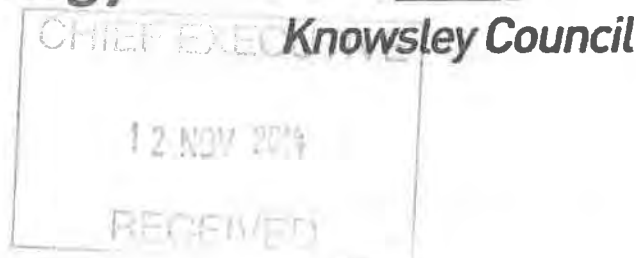






# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	KEITH SHARP	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

*Continue on a separate sheet if necessary...*

If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

1 I OBJECT TO GREEN BELT LAND BEING USED USE BROWNFIELD SITES, ONLY.

2 HEALTH AND SAFETY ISSUES ALSO ALL ASPECTS OF INFRASTRUCTURE

AMBULANCES

FIRE BRIGADE

POLICE

SOCIAL SERVICES

SCHOOLS, NURSERIES

HOSPITALS, G.P.S.

POLLUTION

SAFETY THROUGH TRAFFIC

ELDERLY WELLBEING

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

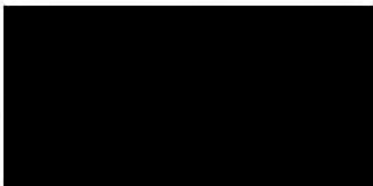
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE  
12 NOV 2014  
RECEIVED

Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Keith Swan	
Job Title (if appropriate)	Psychotherapist	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I 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) Eric Pickles recent announcement on Oct 16<sup>th</sup> 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 projections 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

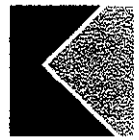
**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 1/11/14

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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#### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Keith Wooding	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B 1- YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Keith Wooding

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
M065

Policy Ref

CS1, to CS5,  
SUE

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

Generally, the Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

It is disappointing that these proposals to build on Greenbelt at South Whiston have only just come to light despite claims that due consultation process has been followed. Public meetings with the Inspector should be re-convened to take into account the views of local residents in accordance with the provision of the Government in the Localism Bill.

It can be seen that the Knowsley Local Plan does not take into account the latest data from the Office of National Statistics (ONS) in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014. Furthermore, the plan, its strategy and objectives contain many conflicting and ambiguous statements, with little in the way of tangible deliverables. Often making reference to flawed and outdated supporting documentation.

Delivery of Strategic Objectives is not considered to be SMART, outputs are not 'measurable' and therefore cannot be seen as being 'achievable'. This in turn would cast doubt on the 'realistic' criteria.

On a personal note if I had submitted proposals for work, of this standard with this many grey areas, undefined & unquantified benefits with little substantive basis, I'd be shot.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

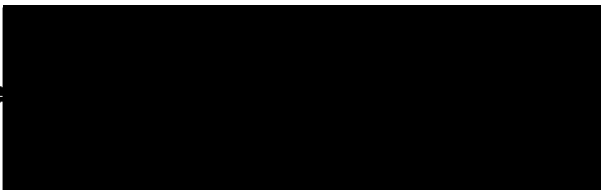
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

## **PART B2 – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Keith Wooding

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
M065

Policy Ref

CS1, to CSS,  
SUE

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| c) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP (updated October 2014) the Secretary of State for Communities, which states "Planners must protect our Green Belt" and "This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development". See link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. It is clear that no exceptional circumstances exist in Whiston.

The North West does not have the Housing shortage that London and the South east has, and as such removal of Greenbelt should not be considered in this case.

This objection to the release of green belt has also been raised as Knowsley council have not proven that all practical alternatives & Brown Field sites have been explored, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley plan fails to give high enough priority and consideration to the empty housing stock within the borough. Knowsley have a very poor record of bringing empty and derelict housing back into use. No reference can be found to any consultation with local housing trusts. Knowsley have not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touches Liverpool at Huyton and the proposals at South Whiston will bring urbanisation up to the boundary with St Helens. Likewise the proposal at Cronton will bring Knowsley closer to Halton. This is NOT consistent with National Policy.

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

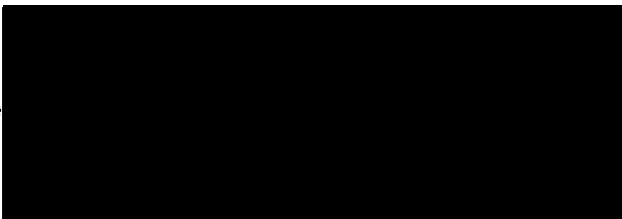
**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

c) No, I do not want to participate at any further public hearing

d) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

## **PART B3 – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Keith Wooding

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M052 to  
M056

Policy Ref

CS2, CS3,

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| e) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

In relation to KGBS14 South of Whiston. This policy is contrary to Strategic Objective 8, CS5, CS8 & CS21. Either the principles set out in SO8 are adhered to, or the land is used for development.

As stated in CS5 and CS8, it cannot meet both opposing policies. In fact C21 8.21-8.26 reduce to the point of being ineffective the relevance of CS3 and the requirement to release Green Belt land for development at all.

Given that there are prime areas of land around Prescot & Huyton that previously have been earmarked for housing yet lie undeveloped for a number of years indicates that Knowsley model for predicting the number of houses that will need to be built and the land required is flawed.

If the model was correct those areas would have been redeveloped. This proves that there is no justification to release Green Belt land except for Knowsley council financial benefit.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

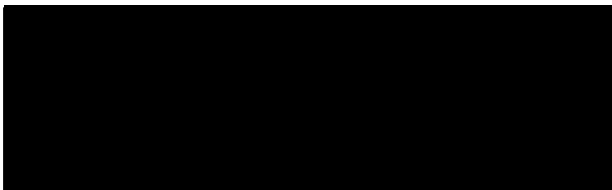
5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

e) No, I do not want to participate at any further public hearing

f) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/4/14



## **PART B 4– YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Keith Wooding

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M062 to  
M069

Policy Ref

CS4

Paragraph Ref

5.29

**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 Arbour Road daily and hence congestion.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

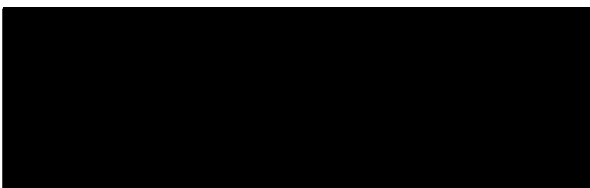
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

4 / 4 / 14

## **PART B5 – 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

M102 to  
M111

Policy Ref

CS6

Paragraph Ref

Clause 1c,4d  
& 6.44,6.45

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

With regard to KGBS14 South Whiston, there is very little mention of provision for new local centre, expansion or regeneration of existing local shops

As for 6.45, the policy is flawed and mostly irrelevant. This highlights lack of understanding of local issues. In turn this suggests that Knowsley have taken a 'one-solution-fits-all' approach. This element of the core strategy cannot be met.

Little mention is made of requirement for additional facilities such as health care or clinic, GP surgeries and dentist. Nursery and school requirements are also not described.

No reference was found to alternative policy documents that would detail these requirements, which suggests that no additional pre-school or school facilities are planned to meet huge increase in demand for services from such a large housing development. Similarly no additional health care provision. A number of strategic objectives will not be met

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

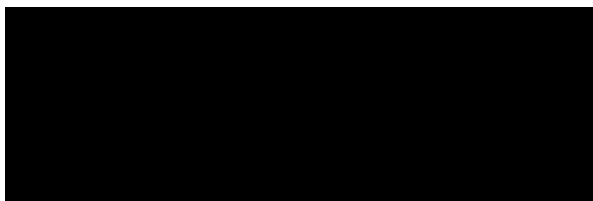
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

i) No, I do not want to participate at any further public hearing

j) Yes, I wish to participate at any further public hearing

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Signature



Date

12/11/14

## **PART B6 – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Keith Wooding

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M112

Policy Ref

CS7

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

Yes

No

k) Legally Compliant? (see guidance note 2.2)

l) 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.**

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.

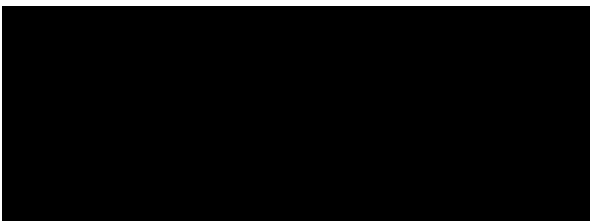
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

k) No, I do not want to participate at any further public hearing

i) Yes, I wish to participate at any further public hearing

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Signature



Date

11/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council

### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Kirsty Leigh Easton	
Job Title (if appropriate)	Teacher	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.



## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

As a teacher I have a stressful job. I use the greenbelt land regularly to relax and plan my lessons in the tranquility of the countryside. I don't find this tranquility in the park land and don't see why I cannot continue to use the greenbelt land which was set aside for the benefit of the community on the outskirts of major cities. I have just bought a house in Knowsley and found a large choice of properties available. There is no need to use greenbelt land.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Inspector to say NO AS Plan is NOT Sound.  
This Plan was not positively Prepared as it was against the wishes of the Community and not enough time was allocated for objection.  
This Plan is not Justified as the Knowsley Population has decreased and the demand for housing has fallen. There are a lot of new developments in the area that are empty including the business parks so we don't need new ones, use the ones already built.  
The Plan will not be effective within the Community who would benefit more from the greenbelt land.  
The plan is not Consistent with national Policy which states that Greenbelt land should be preserved. We have a Right to our Greenbelt land. Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

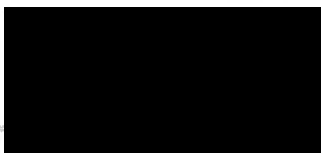
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

3/11/14



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	Miss	
Name	K Meredith	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M055 to  
-----

Policy Ref

KGBS 14

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion, especially as most of my neighbours have only just heard of the proposals to build on Green Belt at South Whiston. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states "Planners must protect our Green Belt" see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case.

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. There is a Duty to Co-Operate which has not been considered.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton. This is not consistent with National Policy.  
**Continued on separate attachment.**

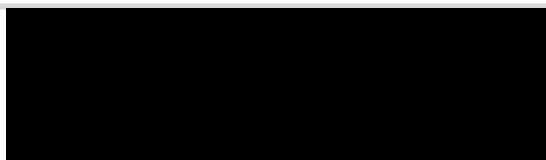
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13/11/14



## Attachment – Objections to KGBS 14

<p>E1 To protect, enhance and manage the local character and accessibility of the landscape and countryside across Knowsley</p>	<p>Although some of the locations that would be released from the Green Belt contain areas that have been previously developed and other policies in the plan will seek to protect landscape character, each of the options could support the release of areas of greenfield land and have a negative impact on landscape character. As such, each of the options has the potential to have a negative impact on the objective. However, Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being ‘called in’ by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term. It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward</p>
---	--

### 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 it’s identity and character as a village community will be lost.
- As this is the last area of Green Belt within the South Whiston area the residents will no longer have access to the natural environment and all the benefits that the natural landscape exhibits.
- Those areas which are not to be included in the release from Green Belt – Old Wood and Big Water – would be severely impacted by the influx of residents to the proposed development. These features would be isolated amidst the proposed development and would be rendered unsustainable as a quality natural landscape and habitat for wildlife.
- Release of the Green Belt in South Whiston will contradict the purpose of Green Belt ‘to retain attractive landscapes, and enhance landscapes, near to where people live’.
- The local character and natural landscape of South Whiston stem from the early 12<sup>th</sup> century (Merseyside Historic characterization Project, 2011). The loss of this natural landscape held within the very last of the Green Belt in South Whiston would see the complete eradication of all the historic character that currently remains. The heritage of South Whiston would thus be lost for all current and future residents.
- Whiston is a ‘village’ with a village community. The proposed development would eradicate this village community as numbers would be too great for the community to be considered a village any longer.

E2	Each of the options could support the release of
----	--



<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. It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward.</p>
---	---

Objections:

- The protection, enhancement and management of the remaining area of ecologically isolated green belt will be rendered a belated and insufficient attempt to restore/protect/fix what has already been lost.
- Ecological dispersal and colonization of protected and endangered species will be prevented via fragmentation of vital habitat networks; inadequate dispersal of species will cause a local and regional extinction of nationally significant and endangered species. (Harrison and Bruna, 1999)
- Agricultural land adjoining Big Water and Old Wood is currently providing essential refuge for nationally endangered, red listed grey partridge, a victim species that relies on farming systems for its food source and habitat. (RSPB, 2014). There is a significant population throughout the agricultural land surrounding Big Water and Old Wood. Nationally 87% of the population of grey partridge has been lost since the 1970's, a direct result of habitat fragmentation and loss. It can be expected to deteriorate further owing to the potential loss of the agricultural green belt of South Whiston.
- The agricultural land adjoining Big Water and Old Wood provides refuge and food source for sky lark which has reduced nationally in population by 62%, overall farmland bird species which have reduced by 56%, and lapwings which have fallen in population by 76% since the 1970's (RSPB, 2014). This land is also the hunting, nesting and breeding grounds of buzzards and barn owls the numbers of which will be directly and severely impacted by the loss of the agricultural green belt in South Whiston. So too the population of their prey of field mice, voles and rabbits.
- Impact of human activity upon the remaining area of Greenbelt, i.e. Big Water and Old Wood after development has taken place would have a detrimental effect upon the quality of natural habitats and upon all local species. Increase in human population in addition to the close

proximity to the remaining Greenbelt will further degrade the natural environment as a result of vandalism and overall human impact.

- Without sufficient connectivity of green corridors the isolated patches of Greenbelt will suffer a loss of biodiversity and environmental quality. Current natural linkages connecting Stadt Moers to the South Whiston Greenbelt would be disconnected by the proposed development, preventing colonization and migration of species.
- Migrating water fowl e.g. Swans, Canadian Geese, Coots, Moorhens, Herons which frequent big water will diminish due to the encroachment of urban sprawl. This will have a detrimental effect upon the quality of Big Water fresh water habitat as they naturally manage the fresh water habitats.
- Had a full ecological and habitat survey been undertaken by KMBC it would have established, in summary, that the urban fringe woodland of Old Wood and Big Water, and supportive agricultural land, all within the green belt of South Whiston, was essential to the conservation of the abundance of wildlife and thus their sustainable future.

<p>E3. To adapt to climate change including flood risk.</p>	<p><b>The Strategic Flood Risk Assessment</b> identifies that a small part of the southern section of the site is at risk of fluvial flooding. This risk of flooding will be exacerbated by climate change and this part of the site should only be considered for development as part of a sequential approach. It is recognised that the identified capacity of the site has been derived from the assumption that the portion of the site within Flood Zones 2 and 3 will be excluded from the developable area and unless this is the case, and the other identified mitigation measures are implemented, the proposals could have a negative impact on the objective and its sub-objective of reducing flood risk.</p> <p><b>The Preliminary Flood Risk Assessment</b> indicates that the site also falls within an area that is susceptible to ground water flooding. Nevertheless, the PFRA does recognise that there is a lack of local information in relation to groundwater flooding and that the dataset used only identifies wider areas that may be at risk from groundwater flooding. Accordingly, the information on groundwater flooding is caveated by the acknowledgement that only isolated locations within the overall susceptible area are likely to suffer the consequences of groundwater flooding. Nonetheless, the proposals would result in a significant area of greenfield land being replaced with built development which may have an adverse impact on levels of surface water run-off if suitable measures are not implemented, such as sustainable drainage systems.</p> <p>The proposals would also result in the loss of a greenfield site that has the potential to provide habitat for species and help mitigate higher summer Temps associated with climate change.</p>
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Objections:

- Extensive inland flooding in 2007 focused attention on the economic and human costs of flooding (Pitt, 2008). Climate change is already causing heavier downpours, especially in winter, a trend that is projected to persist and increase flood risk (Defra, 2009). At present the 110 hectares of Green Belt in Whiston acts a soak for surrounding areas, The increased rainfall in Storm conditions(see below) will seriously challenge the ability of the existing main drains (AD51, map MMD-321747-D-SK-00-XX-0001) to handle such downpours. There is a distinct possibility that the M62 could flood if such a large area of Green Belt is put under concrete. Added to this the proposed development at Cronton (which in certain areas is lower than Whiston) would not be able to take any surplus rainfall.
- Properties in Foxshaw Close and Windy Arbour Close and the Green Belt to the rear of these properties are on a very high water table. These properties had to install extra drainage following the development of the Lickers Lane estate in the 1970's as water levels rose and caused flooding to property foundations. Clear spring water was found beneath floor boards which had to be drained in order to prevent subsidence of the properties and to prevent rising damp.

- Further development of the Green Belt to the rear of the properties will further impact the high water table and increase the probability of flooding to these properties and surrounding properties.
- No indication has been given as to the capacity of United Utilities to provide water treatment and sewage treatment, at the local water treatment works, for the proposed development.

<p>E4. To mitigate climate change including using energy prudently and efficiently and increasing energy generated from Renewable sources.</p>	<p>Each of the options would inevitably result in some carbon emissions and could therefore have a negative impact on the objective and its sub-objective. Other policies in the Core Strategy are likely to ensure that all new development is designed in a way to maximise energy efficiency and it is recognised that the proposers of the site have stated that the site may offer opportunities for decentralised energy systems due to the quantum of development proposed. It is however recognised that there is presently no certainty that such systems would be incorporated into the proposals for the site and it is noted that the Knowsley Renewable and Low Carbon Energy Options study (2009) considered that a purely residential development of the area would be unlikely to readily lend itself to a district heating opportunity. In addition, the site is not located within a 'Priority Zone' for renewable and low carbon energy as identified by the Liverpool City Region Renewable Energy Capacity Study (2009) and it is therefore unlikely to deliver a reduction in carbon emissions beyond those required by Local Plan policies. The proposals are likely to result in an increase in traffic in the immediate surrounding area. It is however noted that there are a range of local facilities and amenities that are readily accessible from sections of the site including primary schools, a GP and health centre and a local shopping centre on Greene's road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opposite side of Windy Arbor Road and Huyton Business Park which may reduce the need to travel for work. Furthermore, both Options 1 and 2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, and taking into account the scale of development that would be likely to come forward on the site, it is considered that each of the options have the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of onsite facilities.</p>
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Objections:

- It is quite clear that the development of Green Belt in Whiston will have an overall negative effect on the aim to mitigate climate Change. The Sustainable and Low Carbon Development (5.183 SD32. CS22) removal of the developers need to meet the Sustainable homes/BREEAM standards will increase energy usage.
- The increase in Traffic in the area will increase carbon emissions and have a detrimental effect on Air Quality.
- The Industrial Estate mentioned on Windy Arbor Road has little effect on employment as the few factories that are occupied, have no need for more workers.
- There is also an acceptance that this development will not be suitable for energy generated by renewable sources. In addition, the removal of the requirement to achieve a certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.
- “The need to build more sustainable housing with a limited supply of land means that innovation is necessary but working towards sustainable communities relies on more than the achievement of zero carbon housing; its success will also be determined by the selection of appropriate locations for development”, Neil Williamson FLI, President Landscape Institute

<p>E5. To provide, conserve, maintain and enhance green infrastructure.</p>	<p>Although Options 1 and 2 would support the retention/provision of some areas of public open space, each of the options would result in the loss of substantial area of greenfield land which offers the potential to function as part of the Borough’s Green Infrastructure network and it is considered that each of the options would have a negative impact on this objective due to the area of greenfield land that would be lost. It is however acknowledged that there is only a low level of certainty over this impact of Options 1 and 2 on the objective due to their potential to retain areas of public open space &amp; increase the quality of the accessible green infrastructure network. By contrast, there is a higher degree of certainty that Option 3 would have a negative impact on this objective as it would not offer the same level of protection to areas of Public Open Space.</p>
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Objections:

- The provision of parks and open spaces in deprived areas such as Knowsley is worse than in affluent areas. The removal of this area of Green Belt would severely impact the deprived residents of this area of Knowsley.
- The higher the quality of the green space, the more likely it is to be used. To build over 1500 houses on Best & Most Versatile Grade2 Agricultural land cannot enhance green infrastructure. Every one of the options would result in the loss of large area of essential open green space. This area of Green Belt is THE VERY LAST piece of Green Belt in South Whiston and as such is the highest quality of open green space in the South Whiston area.
- Open green space is essential to health and well-being especially for mental health and preventing and combating mental health issues. Knowsley MBC would be failing in it’s care of, and provision for, it’s residents suffering mental health issues should this area of Green Belt be developed.

<p>E6. To protect, manage and restore land and soil quality.</p>	<p>Although Options 1 and 2 would support the retention/provision of some areas of public open space, each of the options would result in the loss of a substantial greenfield site. It is also noted that the majority of the site is classified as Grade 2 Best and Most Versatile agricultural land and that parts of the site are presently within agricultural use. It is therefore considered that each of the options have the potential to have a significant negative impact on this objective and also on the sub-objective of directing new housing to previously developed land. There is a higher degree of certainty that Option 3 would have a negative impact on this objective as it could also result in development on the greenfield parts of the site that are existing areas of Public Open Space.</p>
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Objections:

- The majority of the site is classified as Grade 2 Best and Most Versatile agricultural land and has been farmed for many years. None of the options will meet the objective to restore land and soil quality. UK soils store over 10 billion tonnes of carbon in the form of organic matter. The size of this store means soil has a vital role to play in helping to combat climate change. “Preventing emissions from soil and exploring how to increase existing stores of soil carbon can make an important contribution to meeting the Government’s emission reduction targets and carbon budgets, introduced by the Climate Change Act 2008”. Defra, Soils Policy Team

<p>E7. To protect, improve and where necessary, restore the quality of inland, and estuarine waters.</p>	<p>The site is in close proximity to a number of bodies of water, including Big Water. Directing development to locations close to these features has the potential to adversely affect water quality unless adequate mitigation measures are adopted. It is however recognised that there is limited certainty about the impact of development in this location on the water quality. In addition, it is noted that each of the options could result in the remediation of any contamination on the site and thereby eliminate a potential source of pollutants for this watercourse. As such, the impact of each of the options on the objective is uncertain.</p>
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Objections:

- It is critical that this precious resource is managed properly to ensure that the needs of society, the economy and wildlife can be met and maintained in the long-term. Surrounding Big Water Lake with a vast housing estate of over 1500 houses must surely impact on the quality of water in the local area. The lake in this area is used for recreation and fished regularly by a local club, it is considered “Good Fishing” one of its advantages is its rural location. We have seen no mitigation of negative effects on water, suggested by Knowsley Council.

<p>E8. To protect, and where necessary, improve local air quality.</p>	<p>The proposals are likely to result in an increase in traffic in the immediate surrounding area but it is recognised that the extent to which this will impact on air quality is uncertain and the site is not within an Air Quality Management Area. It is noted that there are a range of local facilities and amenities that are readily accessible from sections of the site including primary schools, a GP and health centre &amp; a local shopping centre on Greene's Road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opp side of Windy Arbor &amp; Huyton Bus Park which may reduce the need to travel for work. Nevertheless, these community facilities are some distance from the eastern and southern sections of the site and only the northern sections of the site are within 800m of Whiston railway st &amp;</p> <p>not all of the site is in close proximity to the existing bus routes on Windy Arbor &amp; Lickers Lane. The proposer of the site has also stated that the</p> <p>proposals would include on-site facilities, the provision of new bus routes through the site and that the development would be designed to encourage walking and cycling. Both Options 1 &amp; 2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, due to the number of trips that a development of this scale would be likely to generate, it is considered that each of the options has the potential to have some</p> <p>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>
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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.


*lw*

# 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	Miss	
Name	Laura Furlong	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input 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.

Not Sound because whiston  
can't cope with the extra  
traffice, and local schools cannot  
cope.

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  
the  
Recent Comments made  
by  
Eric Pickles

*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.

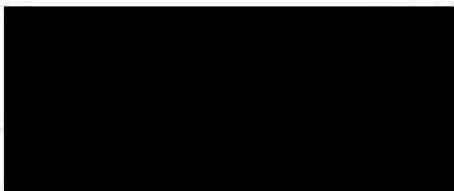
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

## SUE GENERAL 121 ID:370

I have been chosen to speak on behalf of and represent my neighbours, including those considered under age to have a voice within the political system to oppose the development as mentioned on the following grounds. I would also like to highlight that the local Residents' Association are also strongly opposed to the development for various reasons. I wish to oppose development on the following grounds:

As greenland and a carbon sink between the A57 and the residential area, the development represents a loss of amenity, both visual as well as practical to the community, and a loss of natural habitat to various inhabiting species, such as foxes, hedgehogs, field mice, various bird species and bats, which are currently a protected species. The disposal of these species is both unethical and immoral.

The development poses a loss of privacy to many properties which are currently enjoying a quiet, undisturbed environment which is not currently overlooked.

The land in question is currently used by many children to play on as well as dog walkers, keeping them off the streets creating a safer and cleaner environment. There will be a loss of trees which will also affect the visual amenity value as well as ensuring cleaner air in the area.

The development will substantially increase traffic throughout the whole community. Due to the location of the development and its methods of access, many roads will be affected by increased traffic (Mr. Keight to elaborate should the committee request). The children who currently play on the land will be forced to play on the roads with increased traffic and causing a higher risk and unsafe environment for young families as well as the other species which will lose their current habitat. The development therefore poses a highway safety risk as well as impacting on air quality, especially due to the loss of trees, creating smells and an increase of noise and disturbance.

The traffic, the laundry facility and the restaurant will also create smells as well as cause extraction which will affect personal laundry on the outdoor washing lines of the nearby residents. The laundry facility and the catering facility will also pose a higher risk environment due to an increase in risk of fire as well as the hazard of any cleaning chemicals and detergents stored on site for both facilities. This questions the safety aspects of hazardous materials especially in close proximity to a natural stream and therefore an area with intensive ground water, which runs the risk of contamination due to the onsite chemicals.

The design of the development does not compliment the existing area and its appearance is considered ill fitting to the current property styles, a sharp contrast to the existing visual amenity. The maintenance and monitoring of the development are not fit for purpose for many reasons for which my allowed time does not permit me to detail (Mr. Keight to elaborate should the committee request).

There are many more reasons for objection on a political, economical, social and legal basis due to the involvement of local government in this project. However, this is insignificant to the planning process nor is there sufficient time allocated to discuss further. Should this development be approved, these issues, some of a discriminative and dishonest nature will be escalated through central government.

(If enough time...)

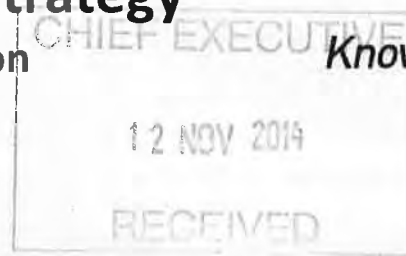
In summary, the proposal of the development is overbearing in nature as it results in the destruction of an essential community amenity. The facilities pose a risk to the nearby residents and other species due to potential exposure to hazardous materials, possibility of contamination as well as extraction that will cause smells and affect air quality and residents' personal laundry. An increase in traffic will also cause smells, reducing air quality as well as compromising highway safety which increases the risk of accidents for children forced to play on the street. The development and traffic will impact on privacy, increase noise and increase disturbance in the area. The development will also result in a loss of trees and habitat of various species as previously mentioned.

# 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	LEONARD TRAN	
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 LEONARD TRAN

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref MOSS -  
MOGS Policy Ref 50220  
51-65  
SUE AD31  
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 FAR MORE SENSIBLE OPTION.

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 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 INFLUX 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 BE 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

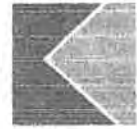
**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

[Redacted Signature]

Date

1/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE

Knowsley Council

13/11/2014

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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	LINDA O'CONNOR	
Job Title (if appropriate)	SELF EMPLOYED	
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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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 production of food plants. If there are no fields there are no plants or bees. We will need new schools & a surgery.

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...

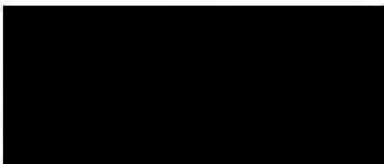
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

12/11/2014

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



### RETURNING THIS FORM

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Lisa Swinden	
Job Title (if appropriate)	Library Assistant	
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.*

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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

Lisa Swinden

### **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) YES

b) Sound? (see guidance note 2.3) NO

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The proposed modifications to green belt land in Knowsley is not sound.

It is not positively prepared because the infrastructure of the surrounding areas will not be able to cope with such a high influx of new residents. The fire station, and some schools have closed. Not to mention the public transport and roads will be congested which will add to pollution in the area, and difficulties getting in and out of the area.

It is not affective as there is other land which can be built on besides green belt land.



**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

To make the modification sound, I would personally suggest looking at the infrastructure of the Knowsley area and realistically looking at data to see what the area would need to cope with a large number of new residents. For example, more schools, amenities, parks, jobs, transport links, etc.

Also, I feel that looking at brown field sites within the area which could be used to build new houses upon could save from destroying the little countryside we have left.

supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

a) No, I do not want to participate at any further public hearing NO

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**

Lisa Swinden

**Date** 10/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MISS.	
Name	LYNN WARBRICK	
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 LYNN WARBRICK

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref KG3514 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 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/Wonsley 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 not be building properties for people who do not live in Winston. At the meeting it was stated that some of the housing was for people of the district & univers this is for work etc it is not needed!! Building on this green belt will help our citizens health, road access, access to NHS etc. We this area is already overloaded with traffic.

*Continue on a separate sheet if necessary...*

Building work units is unnecessary when many units remain unused in the area & surrounding areas. Suburbs 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 QUOTED AS SAYING ONLY WHEN ABSOLUTELY ESSENTIAL SHOULD GREENBELT LAND BE USED TO BUILD SOCIAL HOUSING. THEREFORE THE BROWNBELT LAND PUT FORWARD 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

[Redacted Signature]

Date

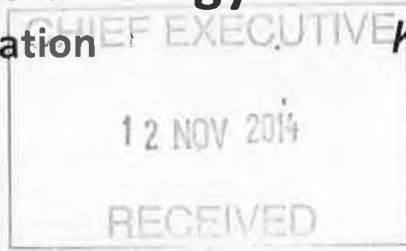
1/11/14



# 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	MISS	girl
Name	M BATTLE	
Job Title (if appropriate)	site owner	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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**PART B - YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

THE GREEN BELT NEED SAVING AND I DONT WANT MORE HOUSING PEOPLE CAN NOT AFFORD NEW AS THEY SOME TIMES HAVE NO JOBS AND BANKS NEED TO LEND TO THEM THAT CAN AFFORD

I WOULD OBJECT TO THE REMOVAL OF LAND AT WHISTON FROM THE GREEN BELT FOR THE FOLLOWING REASONS

ALMOST NONE OUT OF 10 PEOPLE USE PARKS AND OPEN GREEN SPACE AND THEY VALUE THEM AND IF PEOPLE ARE SATISFIED WITH LOCAL PARKS THEY TEND TO BE SATISFIED WITH COUNCIL THE PROVISIONS OF PARKS AND OPEN SPACES IN DEPRIVED AREAS AS WHISTON KNOWS RESILIENCE MONITOR WINTER 2013-2014 IS WORSE THAN IN AFFLUENT AREAS PEOPLE FROM MINORITY ETHNIC GROUPS HAVE LESS LOCAL GREEN SPACE AND IT IS OF POOR QUALITY THE HIGHER THE QUALITY OF THE GREEN SPACE AND MORE LIKELY IS IT TO BE USED TO BUILD OVER 1500 HOUSES ON BEST MOST VERSATILE AND AGRICULTURAL LAND

CANNOT ENHANCE GREEN INFRASTRUCTURE EVERYONE OF THE OPTEONS WOULD RESULT IN LOSS OF LARGE AREA 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.

I THINK YOU SHOULD LOOK AT BROWN PLACE. > WERE IT DOSE NOT AFFECT OUR ORLEANS BELT. A LOT OF PEOPLE DEPEND ON THIS BECAUSE HE CAN NOT AFFORD TO TRAVEL FAR.

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

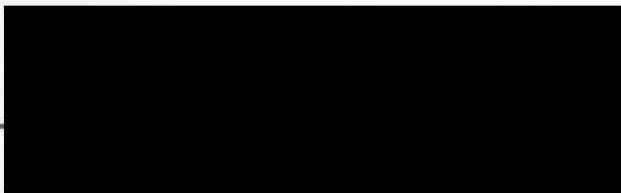
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

1-11-2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form



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 KBBS14 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 (ABOVE) 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 FOR 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.

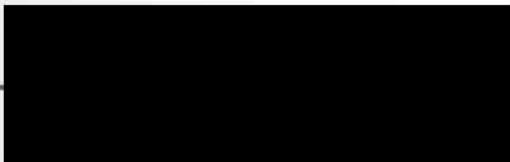
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

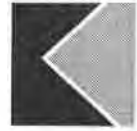
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Signature



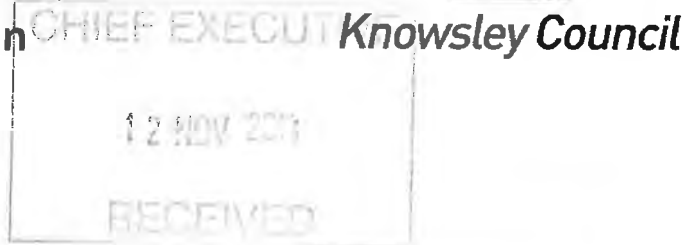
Date

1/11/2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MISS	
Name	Malika Dionne Pachu	
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)

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.

This proposal would not improve health and health inequalities. I believe this green belt land is used regularly by local members of the community and also visitors to the area. It is a calming atmosphere for locals. ~~Green~~ Green spaces have been proven to help with mental health improvements as it promotes exercise and a calming experience. If this land is removed people who enjoy using this land will have no place similar to go. This green belt is not wasteland and ~~is~~ in fact used and loved by the community.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

This proposal contradicts the recent governments statement stating that greenbelt land must be retained and only released as a last resort. There is plenty of ~~greenbelt land~~ brown belt land to use for these kinds of developments. Clearly releasing this land at this moment is not a last resort. There is more appropriate land that could be used.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.


5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you 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

CHIEF EXECUTIVE

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	MARGARET TERABEK	
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.

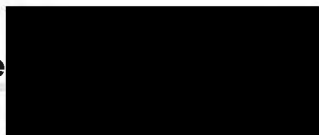
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a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date 1 NOVEMBER

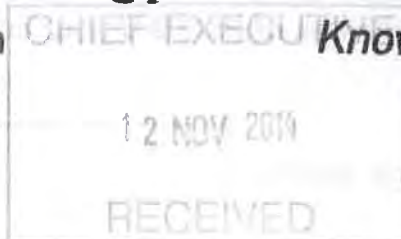


# Knowsley Local Plan: Core Strategy

## 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.	
Name	MARIE 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

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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 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  
Brownbelt + empty properties  
in Knowlley Area.  
Take into account guidance from  
Eric Pickles on 16<sup>th</sup> 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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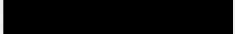
Signature

[Redacted Signature]

Date 1-11-14



11 November 2014

  
Policy Manager (Places)  
Knowsley Council  
Municipal Buildings  
Archway Road  
Huyton  
Merseyside  
L36 9UX

Dear 

**Re: Modification to Core Strategy Greenbelt / Greenfield release for Housing and Urban Development**

I write in response to the above consultation to which I am strongly opposed. In my opinion the Planning Inspectorate are merely responding to the demands from landowners and developers, who are seeking to make profits at the expense of the release of greenfield sites for housing, within the boundaries of the historic villages of Prescot, Whiston, Cronton and Knowsley Village.

No consideration is being given by the Planning Inspectorate to the significant potential local traffic impact in Mill Lane and Blundells Lane, which is already an area suffering from high levels of traffic.

Neither does the strategy give any acknowledgement to the potential impact on school places in both St.Helens and Prescot.

There are no grounds for greenbelt release in these areas. There are a considerable amount of brownfield sites in Knowsley available for development. Unless these brownfield sites are developed there is a danger that Knowsley will be left with blighted brownfield contaminated sites, whilst developers profit from the release of greenfield / belt sites.

I am strongly opposed to the proposals which are unfair on the residents of Prescot, Whiston, Cronton and Knowsley Village, as they are ill considered and unjustified.

Yours sincerely



M E Rimmer, CBE

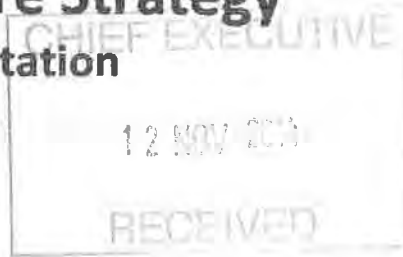


Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

**RETURNING THIS FORM**

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014**. Forms received after this time can not be accepted.

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
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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	MARK WMAN	
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

K9BS14

Paragraph Ref

EC2

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes

No

a) Legally Compliant? (see guidance note 2.2)

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 EC2 BECAUSE OF TRAFFIC WHICH IS ALREADY EXTREMELY BUZY AT RUSH HOUR. MORE TRAFFIC AND MORE CONGESTION ALSO THE EXTRA POLLUTION WHICH WILL BE CAUSED BY THE EXTRA TRAFFIC. ALSO THE EFFECT IT WILL HAVE ON THE FLORA + FAUNA WHICH WILL DISAPPEAR.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

TO USE BROWN FIELD SITES FIRST THEN CONSIDER USING GREEN BELT ONLY AFTER THE BROWN FIELD SITES HAVE BEEN SUCCESSFUL

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

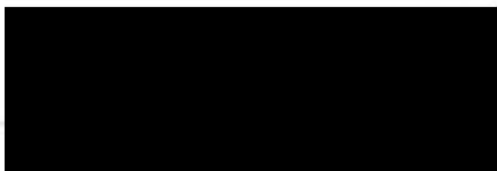
5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**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

CHIEF EXECUTIVE  
Knowsley Council

12 NOV 2014

RECEIVED

### RETURNING THIS FORM

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	MARK JONES	
Job Title (if appropriate)	Technical Services Specialist	
Organisation (if appropriate)	FUSITSU SERVICES	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*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)

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 whole point of green belt sites is to protect the countryside from urban sprawl and ensure the natural character of towns and villages is not destroyed.

The proposed area of release is the last green belt site in south Whiston and the population will lose out on the ability to access the natural land and wildlife.

If the proposed areas of greenbelt are released and developed the isolated Big Water and Old Wood would be negatively impacted by the encroaching urban development, and wildlife such as birds, waterfowl and animals would face a loss of habitat and quality of the remaining land due to human interaction.

A full survey would conclude that the loss of the urban fringe woodland, surrounding farmland and other areas would severely affect the biodiversity of wildlife and their habitats.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Please take into consideration, before the release of greenbelt land, the comments made by Eric Pickles, who states, that green belt land must be retained and only be released when all other options has been exhausted.  
All brownfields sites must be developed first before moving onto green belts.

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.

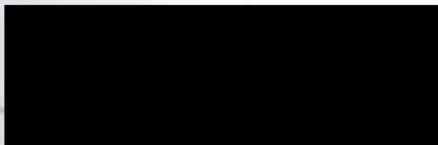
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b) Yes, I wish to participate at any further public hearing

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Signature



Date 01/11/14



Knowsley Council

# Knowsley Plan: Strategy

## Local Core



Knowsley Council

## Proposed Modifications - Consultation Representations Form

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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	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 with .....traffic 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.

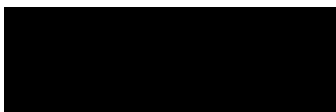
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**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) Yes, I wish to participate at any further public hearing

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Signature



Date 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.

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- a) Yes, I wish to participate at any further public hearing

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Signature



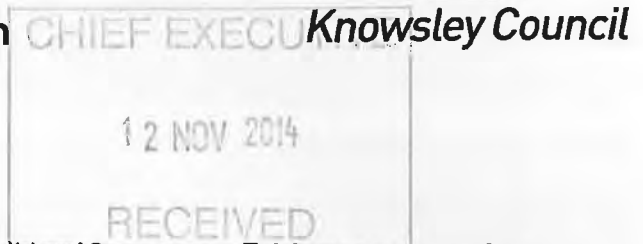
Date 12/11/2014





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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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

K&BS14

Paragraph Ref

EL2

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

There is 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

**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

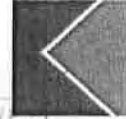
[Redacted Signature]

Date

1-11-2014

# 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	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 MARIUS BROWN

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref KGBS 14 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 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 ALONG WINOY HARBOR ROAD. THERE WILL ALSO BE SIGNIFICANT IMPACT ON ALL LOCAL SERVICES E.G. HEALTHCARE 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.

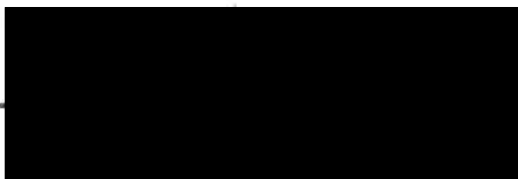
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

01.11.2014

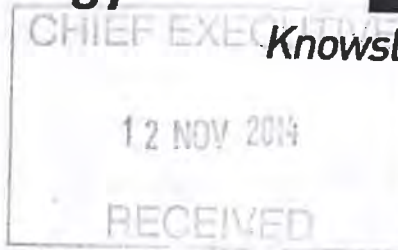


# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	MAURICE STEELE	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.



## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

SUE

Policy Ref

KQBS 14

Paragraph Ref

E 5

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes

No

a) Legally Compliant? (see guidance note 2.2)

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.

South of Whiston

- 1) Modification to show changed designation of land from Green Belt to Sustainable Urban Extension (for residential use).
- 2) Modification to show changed designation of Fore Bank Lane cemetery from Green Belt to Urban Greenspace and Educational Land.
- 3) Land of South of M62  
Modification to show changed designation of land from Greenbelt to Urban Extension (for employment and Country Park uses)

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

~~of~~ <sup>Before</sup> any development of the land to South of M62 ~~to~~ I think all Brown field should be first built on I don't feel that enough thought has been given to this when you look at the proposed plans it is obvious the amount of Building planned and the new roads required to support this will bring utter chaos to the area. Hospital New homes where are shops Public transport needed to sustain this. Show the public all the proposed Building plans where the houses are going. the roads then let the public decide if the loss of all this Greenbelt is worth it, (BUT BEFORE) ANY OF THIS USE ALL BROWN BELT LAND FIRST.

Continue on a separate sheet if necessary...

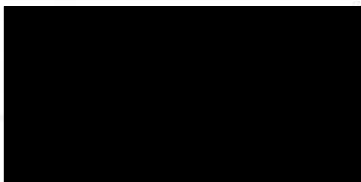
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5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/2014





# 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	Mike Gittens	
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

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

12<sup>th</sup> November 2014



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

#### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

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#### **PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mr	
Name	Michael Humphreys	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

South of  
Whiston

Policy Ref

KGBS14

Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound** (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). **If you wish to support the modification, please use this box to set out your comments.**

S1 – With regards to this statement I do not see any evidence in the proposed modifications which will bring employment into the region beyond the initial building stage. The building stage does not guarantee that the local building trade will benefit as corporate house building companies have established suppliers and will not necessarily benefit local building trade. If you consider that Knowsley's own website advises that apprentices be paid the statutory minimum wage I don't see this having an impact on the economy to justify the building of a minimum of 1503 houses.

S3 - With no plans to increase police budgets only to decrease based on the national plan for the police. In fact a rapid population growth will increase the cost of services such as police.

S4 – Knowsley shows no sign of being able to communicate the basics of ripping out the greenbelt in its own local area so I have little hope that they will make a contribution to improving community decision making.

S5 – Knowsley has one of the poorest results for emphysema, breast-feeding take up rates, childhood tooth care (I could go on) with no consideration for expanding the local NHS facilities it would either put a massive drain on the existing services or leave the new inhabitants with no facilities to use such as GP's, dentists and childcare. There is no plan in place that shows we will have confidence in our council to adapt and implement the necessary. This news article demonstrates the type of mismanaging that continues today  
<http://www.liverpoolecho.co.uk/news/liverpool-news/councillors-anger-18m-unspent-funding-7883509>



### 3. Continued

E1 – by building on the greenbelt we will no longer have access to the landscape and countryside across Knowsley as the remainder of the Greenbelt is on the Derby Estate which is private property with very little access.

E2 – I simply don't understand how you can justify this statement as you plan to cover it in concrete.

E3 – I can find no record of Knowsley council accessing the flood records through the Environmental Agency held in Warrington which shows upon building Foxshaw close and Windy Arbor Close faced difficulty due to wet soil, flooding and landslides. Though there are no legal requirements to do this surely when making plans to develop an area ground conditions are a priority!

E4 – E11 there is no evidence to suggest this will have a positive effect on the area by removing green land in favour of housing and concrete.

EC1 – The governments own Portas report shows that more and more people are moving away from shopping experiences similar to those found on Greene Lane in Whiston Village. With little investment being put into these areas they are starting to look tired and unkempt.

EC2 - several attempts to revitalise the centre of town in Prescot have failed and we continue to see shops close and left empty. This in no way would attract people to an area leaving this proposed estate with little interest.

EC3 – the proposed occasional shop within the plan does not make a thriving business to employ 3000 people does it? And the proposed warehouse which I assume (like many of the facts in this document) will employ people on or near minimum wage I do not see how they would be able to afford some of this housing.

14/11/14

2/12/14

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

The council has failed to release brownfield sites in a timely manner for development such as the 2 demolished leisure centres in Huyton and Prescot. Further investigation as to why Green belt is now favoured over all brown field should be investigated.

Knowsley Council have failed in their due diligence to inform the local population as to the proposed plans. They themselves have accused Royal Mail of failing to deliver notifications however there has been no pressure or charges brought for tampering with the mail. It has only been a local campaign that has seen the population informed.

The 5 day consultation last year when very few people came shows how poorly informed people were in comparison to all the forms you are receiving now in protest to it. I would recommend a new consultation of the local people.

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

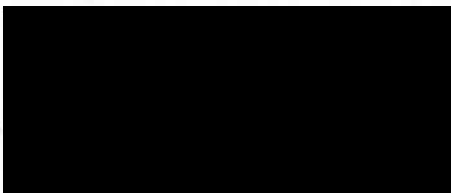
**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

14/11/14

[REDACTED]

---

**From:** Michael Reid [REDACTED]  
**Sent:** 01 October 2014 09:19  
**To:** [REDACTED]  
**Subject:** Knowsley greenbelt

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

May I add my objections to the proposed development of greenbelt land in Knowsley. Reclamation of current under developed land, in particular the Page Moss area, must be a priority. Underused industrial lots abound in the borough, I see there are plans to create more, I simply ask, why?

Regards

Michael Reid  
[REDACTED]



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	mrs	
Name	Michelle Inman	
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

Michelle Inman .

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KG8514

Paragraph Ref

EC2

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I object because of increased traffic, pollution and noise, overloading local services, loss of farming land, loss of wildlife, loss of village community resulting in an urban sprawl.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

To use Brown Field sites For Development only when these Developments have been SuccesFull then Consider using Greenbelt land For Development.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

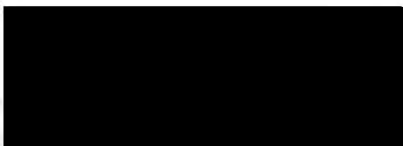
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Signature



Date

1/11/14

# Supplementary Planning Documents (SPD) & Local Development Orders (LDO)

## Consultation - Response Form



### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Tuesday 21 October 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Mike Collier	
Job Title (if appropriate)	Volunteer Planning Officer	
Organisation (if appropriate)	████████████████████ ████████████████████	
Postal Address	██████ ██████████ ██████████ ██████	
Postcode	██████	
Telephone Number	██████████	
Email Address	████████████████████	
Preferred Method of Contact	email	

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR RESPONSE

Please use duplicates of Part B, as necessary for different parts of the document.

### COMMENT No 1

1. To which SPD or LDO are these comments intended to relate?

Core Strategy (Proposed Modifications)

2. To which part of the SPD or LDO are these comment intended to relate?

Page

Paragraph / Figure

5.95

3. Please provide comments below.

The Trust feels that the Key Priorities referred to in paragraph 5.95 should include the full hierarchy of designated sites as listed in paragraph 5.95B. Wording for the first bullet point along the following lines is suggested:

[“To manage the natural assets better – to protect the integrity of all designated nature sites, and to.....”](#)

## COMMENT No 2

1. To which SPD or LDO are these comments intended to relate?

Core Strategy (Proposed Modifications)

2. To which part of the SPD or LDO are these comment intended to relate?

Page

Paragraph / Figure

6A.29

3. Please provide comments below.

The Trust suggests the amendment of the wording of the third sentence of paragraph 6A.29 to read as follows:

[“These capacity estimates take account of constraints within the site allocation including Local Wildlife and Geological Sites, and the presence of priority habitats and protected species.”](#)

**COMMENT No 3**

1. To which SPD or LDO are these comments intended to relate?

Core Strategy (Proposed Modifications)

2. To which part of the SPD or LDO are these comment intended to relate?

Page

Paragraph / Figure

6A.31

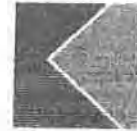
3. Please provide comments below.

The Trust fully supports the wording of this paragraph of the policy.

*Continue on a separate sheet if necessary...*

**Signature: Mike Collier**

**Date: 7<sup>th</sup> October 2014**



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council

RECEIVED  
12 NOV 2014  
EXECUTIVE

### 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\*

	Personal Details*	Agents Details*
Title	MISS.	
Name	MYRA HANKEY.	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## PART B - YOUR REPRESENTATIONS

(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

129BS14

Policy Ref

E1-E9

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes

No

a) Legally Compliant? (see guidance note 2.2)

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.

This plan would bring extra traffic to the area, there is already too much in the village already windy about roundabout is not capable of coping with more traffic. More houses means more cars, families have more than one car, when the roundabout is out of action windy about road is gridlocked!

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

It is impossible, Whiston will never cope with the amount of traffic, new homes will bring schools can't cope now, so all the extra children will put extra strain on the services

Take note of EMC Pickles Oct 14. no green belt should be built on until all brown fields sites have been built on.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

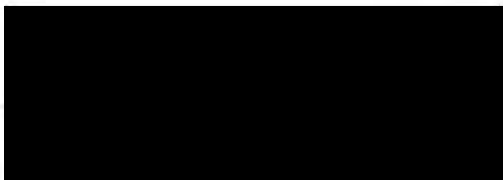
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a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date 11/14

[REDACTED]

---

**From:** Nattalie Kennedy [REDACTED]  
**Sent:** 20 October 2014 10:34  
**To:** [REDACTED]  
**Cc:** Programme Officer  
**Subject:** Recent Govt publication - protect our green belt land

In light of the recent Govt publication I would expect a review of the Local Plan and the subsequent interim findings from the Inspector. Thus the review of environmental, social and economic cost benefit of using developed/brownfield/contaminated and derelict sites throughout Knowsley. There needs to be more done by Knowsley Council to ensure that these sites are used first. Knowsley Council is failing it's population by not ensuring these sites are brought into use.

Knowsley Council need to make these locations desirable.

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

Recently published 4th October 2014

Eric Pickles said:

This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development. Today's guidance will ensure councils can meet their housing needs by prioritising brownfield sites, and fortify the green belt in their area.

Regards Natly





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	NICHOLAS MARK DAVISON	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### 1. To which proposed modification to the Core Strategy does this representation relate?

*all modifications.*

Modification Ref

Policy Ref

Paragraph Ref

PDF

### 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.

X

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 removal from the GREEN BELT of these proposed sites, as the amount of traffic use resulting from this, would be too much for an already overly used 'B' road to handle.

P.S. This is a vote to sustain the present GREEN BELT. I should not have to explain or give a reason for my objections to 'modification'.

NPPF GOVERNMENTS COMMITMENT TO  
PROTECT THE GREEN BELT FROM  
DEVELOPMENT.

ERIC PICKLES (RT HON MP) 4th Oct 2014 Continue on a separate sheet if necessary...

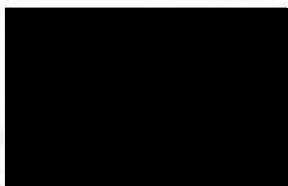
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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

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Signature



Date

9/10/2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE  
Knowsley Council

12 NOV 2014

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	
Name	Nicola Bayle	
Job Title (if appropriate)	Optical Assistant	
Organisation (if appropriate)	NIA.	
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 Nicola Boyle

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref Whiston South Policy Ref KGBS14 Paragraph Ref S7, S4, S5  
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.**

I am objecting to the plans to build extra housing on the grounds that Whiston Village cannot sustain more traffic and people. I think it is a disgrace that Knowsley Council are hacking away at our greenery & wildlife whilst preaching to our children in schools about conservation how do I explain to my children the importance of trees and insects and other wildlife if I have nothing to show them, should I really ~~even~~ have to take them in my CAR to formby or southport to see such wildlife. I also have grave concerns about our health I already live close to a motorway and am constantly dusting because of the pollution, I am appalled to think how this will effect our health both during and after building. Other objections are to do with class sizes y childrens classes 3 yrs ago were 25 now it has

*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 am sympathetic to expansion and development and understand once there were fields etc where my house once stood, but this is not reason enough to destroy what little beauty we have left as some point somebody has to say enough. Looking around the area I see properties standing empty please fill these and our brown belt land first. If we didn't give away so much social housing Knowsley Council wouldn't need to build to bring in more revenue. I would rather see this land used for educating our children - build allotments, nature spots with facilities like those at squirrel forest to encourage people to appreciate how important wildlife is to us all.

Continue on a separate sheet if necessary...

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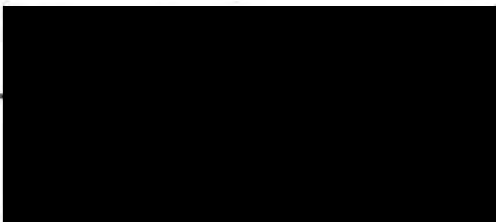
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b) Yes, I wish to participate at any further public hearing

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Signature



Date

21/11/14

30-35. Do I think this will have an impact on my child's education, absolutely. Another aspect of concern is the waiting time for G.P, dentist and our hospital, flooding the area with more people is only going to expand these times.





# Knowsley Local Plan: Core Strategy

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Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Nicola Hitchen	
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 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 development of the proposed 1503 new houses would be in direct conflict with the national policy to protect green belt land. That policy is in place for specific purposes and it would impact detrimentally on the openness of the green belt.

There is no evidence of very special circumstances required to override the harm to the green belt – the absence of a five-year housing land supply in Knowsley does not constitute very special circumstances.

The development would damage the special landscape, character and appearance of the area.

I refer to the Technical Report which states 'there is also the potential for negative impacts in relation to environmental resources, primarily the loss of agricultural land and potential impacts on nearby ecological sites.

The Report also claims 'that the release of this location would be compatible with the principles of the national Green Belt policy.' The proposal is in conflict with the report in allowing urban sprawl.

I refer to Strategic Objective 6 (SO6) Sustainable Transport. This objective is to 'ensure new development in Knowsley encourages a reduction in the overall need to travel and prioritises sustainable transport such as walking, cycling and public transport.. This objective was scored

If you are **objecting** to the modification please set out **how** you consider it should be changed to make 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 ...

*Continue on a separate sheet if necessary...*

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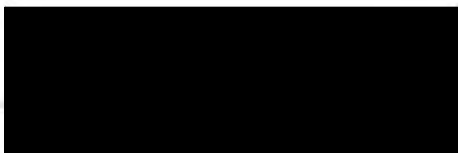
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Signature



Date 11/12/2014

The development of the proposed 1503 new houses would be in direct conflict with the national policy to protect green belt land. That policy is in place for specific purposes and it would impact detrimentally on the openness of the green belt.

There is no evidence of very special circumstances required to override the harm to the green belt – the absence of a five-year housing land supply in Knowsley does not constitute very special circumstances.

The development would damage the special landscape, character and appearance of the area.

I refer to the Technical Report which states 'there is also the potential for negative impacts in relation to environmental resources, primarily the loss of agricultural land and potential impacts on nearby ecological sites.

The Report also claims 'that the release of this location would be compatible with the principles of the national Green Belt policy.' The proposal is in conflict with the report in allowing urban sprawl.

I refer to Strategic Objective 6 (SO6) Sustainable Transport. This objective is to 'ensure new development in Knowsley encourages a reduction in the overall need to travel and prioritises sustainable transport such as walking, cycling and public transport.. This objective was scored a 'minor positive'. How can bringing 1503 (4000 new residents?) to the area encourage a reduction in the overall need to travel? It is incorrect.

I refer to Strategic Objective 8 (SO8) Green Infrastructure and Rural Areas, which refers to 'support and strengthen the role of Knowsley's Green Infrastructure (in rural and urban areas), promote biodiversity....' This was score a minor negative! The report is flawed! It is noted that 'development of this area may have a detrimental effect on this land (which is best and most fertile) coming back into agricultural use in future.' This objective should have been scored a major negative. It needs to be reviewed.

I refer to point 9 in the Technical Report, Promoting Health and Wellbeing in Knowsley. The Public Health England Health Profile 2014 for Knowsley states that 'the health of people in Knowsley is generally worse than the England average.' An increase in transport on the roads of Knowsley will not only have a detrimental impact on highway safety, it will be detrimental to the health and well being of residents in an area where there are already many health issues.



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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	ML	
Name	NORMAN FEELY	
Job Title (if appropriate)	SALES MANAGER	
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

Norman FEELY

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.

I Do Not WANT TO BUILD ON GREEN BELT LAND  
AS PER ERIC PICKLES COMMENT IN OCTOBER 2014

IT WILL HAVE A DETRIMENTAL IMPACT ON THE ENVIRONMENT  
IN WHISTON

THE TRAFFIC CONGESTION WILL BE BAD AS THE ROAD  
STRUCTURE WILL NOT HANDLE MORE 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.

THE GOVERNMENT WILL NEED TO CONDUCT A THOROUGH SURVEY OF THE AREA AND PROPOSED CHANGES.

*Continue on a separate sheet if necessary...*

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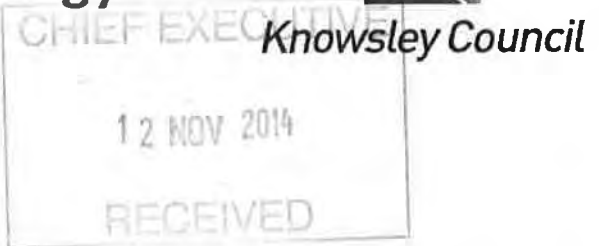
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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	PATRICIA BR. MRS	
Name	PATRICIA BRACKLEY	
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 PATRICIA BRACKLEY

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

My objection to the proposed plan :-  
OUR LOCAL SHOPS WILL  
OVERCROWDING IN SHOPS. BE FORCED TO CLOSE.  
PRESSURE WILL BE PUT ON DOCTORS, DENTISTS,  
PRACTICES.  
THERE WILL NOT BE EXTRA ROOM IN THE LOCAL  
SCHOOLS, IF MORE HOUSES ARE BUILT.  
THE TRANSPORT SYSTEM MUST BE CONSIDERED.  
EXTRA TRAFFIC ON THE EXISTING ROADS  
WILL NOT BE TOLERATED.  
IF MORE HOUSES ARE BUILT - AND THE GREEN BELT  
IS TAKEN AWAY FROM THE EXTRA POPULATION.  
THERE WILL BE NO GREEN BELT FOR THEM TO ENJOY.  
*Continue on a separate sheet if necessary...*  
WE DO NOT WANT OUR GREEN-BELT DESTROYED

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make 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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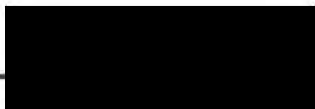
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#### **PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	Mrs	
Name	Patricia McDonald-Holmes	
Job Title (if appropriate)	Printmaker Artist / Teacher	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Patricia McDonald-Holmes

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS14

Policy Ref

E3

Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

- There is a need to consider the impacts of flooding in general and flood risk; **'The re-use of land should be promoted to minimise the take-up of greenfield land'**.

**Source: Sustainability issues were derived from the baseline data gathered in 2008 – 2009 to inform the SA SD07 Scoping Report, Knowsley council**

- Extensive inland flooding in 2007 focused attention on the economic and human costs of flooding (Pitt, 2008).
- South of the M62, the watercourse becomes Chapel Brook and is joined by a number of tributaries, including Fox's Bank Brook. South of this the watercourse is known as Ochre Brook and it flows southwards for approximately 1km before being met by Dog Clog's Brook and turning to flow westwards. Fox's Bank Brook and Dog Clog Brook both drain the low lying area to the east of the A5300 that lies between Whiston and Rainhill in the north and Ditton in the south.

**"The areas generally affected by Flood Zone 3 are: Settlements along Dog Clog Brook; Settlements along Fox's Bank Brook;"**

[http://www.knowsley.gov.uk/pdf/EB15\\_StrategicFloodRiskAssessment-Level2.pdf](http://www.knowsley.gov.uk/pdf/EB15_StrategicFloodRiskAssessment-Level2.pdf)

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

- To prevent flooding possibilities in the future **YOU** must Insist that brownfield sites are developed before considering GreenBelt Land release as the impact on our area and community will be disastrous.
- Strategic Flood Risk Assessments need to be completed to identify areas at risk of flooding in the proposed building sites!.
- Put back any GreenBelt release until the end of the plan period, and even then consider all other areas first.
- GreenBelt release is the last resort and not the first response to take.

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Sig

Date 13/11/14





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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		
Name MR	PATRICK O'ROURKE	
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)**

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.**

*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 NEED TO USE GREEN BELT LAND, PLUS ALL THE LOCAL SERVICES ARE UNABLE TO COPE AT THE PRESENT TIME, WHAT WILL IT BE LIKE IF WE USE GREEN BELT LAND. ANY SOMEWHERE DOWN SOUTH.

Continue on a separate sheet if necessary...

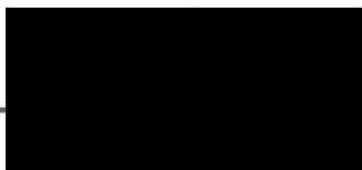
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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 5 - 11 - 14



Knowsley Council

# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

#### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Paul Marshall	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Paul Marshall

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

All relevant

Policy Ref

All relevant

Paragraph Ref

All relevant

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

#### Consultation Process

I would like to make clear that I wholly reject the assertion made in section 1.3 of the guidance notes of this form (CS Mods Response Form and Guidance PDF), which states

*"Comments are sought specifically on the proposed modifications to the Plan. This is because parts of the Plan which are unchanged have already been subject to consultation and discussed at the Examination hearings. "*

I reject this on the grounds that the Council's claims that enough people were informed of the consultation process are unfounded, with myself and hundreds if not thousands of others being completely unaware of the Consultation Process or the Local Plan even existing until after these important consultation periods had ended.

Also although a lot of information may exist at the specified website address, a lot of residents are unaware of it and some do not even have access to or use the internet in the first place, which is what the entire consultation process is more or less designed around, excluding further people from the process.

If the council has not properly informed its constituents of the consultation process, then there is no way that that process can then go on to be legally compliant or sound. Huge swathes of people concerned and affected by the Local Plan have not been informed of the consultation until after key phases were completed and therefore those phases cannot be considered to be valid.

**CONTINUED....**

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

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Signature

██████████

Date 7<sup>th</sup> of November 2014

Further objections to the Local Plan include the following points:

### **WILDLIFE**

The wildlife on the greenbelt site must be protected at all costs, but no guarantees have been made about this. At the public consultation in Whiston, a video of which can be found here: <https://www.youtube.com/watch?v=d3WuxRrS1ow&list=UUTaqTuHMu4mtYyoTYUCymrQ>

██████████ of Knowsley Council stated that the council's own survey commissioned to assess the area found that there is significant ancient woodland and valuable wildlife within the greenbelt. He then went on to state that they would 'like' for developers to develop on the areas that have less value in this respect, but later in the same video Knowsley Council's representatives admitted that any details on where would be developed and where wouldn't would not be a decision for the council but for the developers.

In other words, there is no guarantee that the wildlife and woodland would be protected, and what is certain is that at least part of it (the supposedly 'less valuable' parts) would be lost.

### **POPULATION**

Knowsley's population has been in decline for several decades and there is no solid evidence that this is going to change. Even population projections from Knowsley Council's own data (Sub National Population Projections Update 2014) offer contradicting guesses and predictions of growth far lower than that would necessitate the exceptional circumstances which would justify removing the land in question from greenbelt status. There are already significant numbers of empty properties all over the borough, as well as plenty of brownfield that remains undeveloped as well as business properties that remain vacant.

### **GREENBELT STATUS**

The council attempts to assure us that the plan is only to remove the protected land out of greenbelt status, and that this doesn't necessarily mean it will be developed. It will be a lot more likely to be developed once it has lost greenbelt status protections afforded to it. The idea that taking the status away is in itself an innocuous act is incredibly disingenuous.

### **BROWNFIELD AND ECONOMIC VIABILITY**

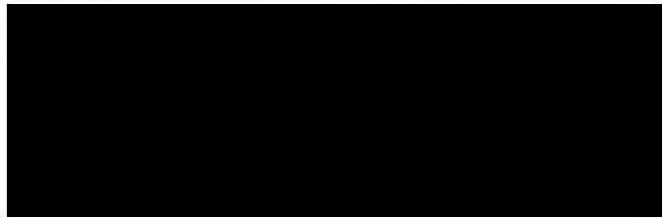
The Government Secretary of State Eric Pickles recently went on record to reiterate that councils must protect greenbelt at all costs and may only consider developing greenbelt land in extremely exceptional circumstances. Such circumstances have not been proven by the Local Plan, and not enough has been done to source alternative land for development. Economic Viability of brownfield land should not be a concern of the council, which does not own the greenbelt. Simply stating that developers would prefer the more lucrative economic prospect of greenbelt development over developing on brownfield does not fall into exceptional circumstances or a last resort justifying its release from. The council states government has forced its hand to develop greenbelt, and Government says don't develop on greenbelt. If even government and the council cannot agree on who is the driving force behind this plan, then how can the plan be considered legally compliant and sound?

In conclusion, I oppose the legal compliance and soundness of the local plan on the following grounds:

- No guarantees of protection to wildlife or heritage land from developer's future proposals.
- Seriously flawed consultation process which failed to involve the majority of the affected constituents within the consultation period.
- Insufficient evidence that the population of Knowsley will increase to the degree that necessitates the scale of development considered.
- Insufficient evidence that other sites were properly considered, or that the Government's instruction to protect greenbelt at all costs has been adhered to.

The law states that Greenbelt cannot be developed except as a last resort, and the circumstances which constitute this have not been proven by any stretch of the imagination. If the government is against greenbelt development, if the council was reluctant to use the greenbelt in its plan, and if the people themselves are against the development, how can it go ahead? Do developers now have the power to govern our country and our communities? Does economic viability trump both the law and the will of the people?

CHIEF EXECUTIVE  
14 NOV 2014  
RECEIVED



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 Knowsley<sup>1</sup>.

**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.

<sup>1</sup> Knowsley Local Plan Monitoring Report (2012) states that there are 2020 empty homes in Knowsley (Section 3.65, page 30).

This representation is spilt 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 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		
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	██████	

*\*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

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 21<sup>st</sup> Sept of this year. Because of this, I have been unable to participate in the development of this plan as a part of the local community. I know of many other members of the local community, who feel this way too. Therefore, I do not believe that there has been proper and sufficient participation of the local community.

Since the proposals were publicised by Knowsley Council (Sept 21<sup>st</sup> 2014), there has been a massive show of objections against the plans to release greenbelt from the Knowsley community. I've yet to speak to anyone (with the exception of Councillors and/or Council Officers) who agrees with the greenbelt release proposals within the local plan.

In July 2014, a poll was set up on the Facebook page [www.facebook.com/groups/huytontpwigu](http://www.facebook.com/groups/huytontpwigu) asking members of the public if they would be in favour of building houses and a business park on the greenbelt land on Knowsley Lane. At this moment in time, 202 people have voted. 198 are against and 4 are for the plan. This is over 98% of people polled who are against building on the greenbelt land concerned. I would say that this is a very good representation of the feeling of the community over these plans, and this needs to be taken into account.

Continued.....

In order for the local plan to be sound, it should be ***“founded on a robust and credible evidence base involving: evidence of participation of the local community and others having an interest in the area; and research/fact finding: the choices made in the Plan are backed up by facts”***

The evidence by which Knowsley Council are using to ascertain population and household rises in order to determine how many properties will be needed by the Knowsley Community in the future, is unreliable simply because of the fact that past ONS projections have been shown to be inaccurate and yet Knowsley Council are prepared to lose vast areas of greenbelt based on such unreliable evidence.

**Section 2.1.8** (page 15) of the Technical Report produced by Knowsley Council in 2013 states that *‘the Office of National Statistics population projections are directly relevant to considering the level of new housing to be provided.’*

**Section 2.10** (page 16) of the submitted Knowsley Core Strategy (**July, 2013**) states, “National projections indicate that the borough’s population will increase by about 4000 between 2011 and 2021. This figure is based upon the interim 2011-based sub national population projections.

**Section 4.3.6** (pages 44 - 45) of Planning for Housing Growth in Knowsley (**Technical Report produced by Knowsley Council in 2013**) gives a projection that the population of Knowsley is expected to rise by just over 3000 people between 2011 and 2021.

However, the sub-national population projections update (**June 2014 version, document SD31** in the examination library) gives a much lower figure, over a greater time period. **Section 6.1** (page 16) of this document states that Knowsley’s total population is expected to rise by 1800 persons between 2012 and 2037.

Previously, the ONS predicted a rise in Knowsley population would be between 2006 and 2029 of +7500 , from 151,300 to 158,800. Yet eight years later, the Knowsley population has declined, as it has done since the 1970’s.

Therefore, it is my view that we cannot lose our valuable, and highly agricultural greenbelt land, based upon the say so of highly unreliable evidence. Once this valuable is developed, it is lost forever.

The Knowsley Strategic Housing Land Availability Assessment (SHLAA) 2012 identifies that “land within **the urban areas** of the Borough can provide a net supply of land sufficient for **5,636** dwellings. This is sufficient to cover a period of 12.6 years”.

This is more than enough new houses to cope with Council’s predicted population rise of 1800, IF indeed the population numbers were to actually increase, which would go against all previous records since 1971.

There are currently 64,629 dwellings in Knowsley, of which 3.13% are vacant, which is **2020** empty properties.

Furthermore, in October 2014, the Government issued new guidance regarding the release of greenbelt land. Specifically the new guidance makes it clear that councils do not have to build on the Green Belt just to meet the locally set five-year housing targets. **Housing need cannot be used to justify ‘inappropriate development’ in the green belt, it said** and that **“Unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “exceptional circumstances” justifying inappropriate development on a site within the Green Belt.**

At the Knowsley Town Council meeting on 16<sup>th</sup> Oct 2014, Council Officer Lisa Harris stated, *“What I would say is, that the exceptional circumstances would be the issue of us having insufficient land (for the development on greenbelt)”*

The National Planning Policy Framework makes it clear that, once green belt boundaries have been established they should ‘only be altered in exceptional circumstances’

I do not believe that Knowsley Council has demonstrated that any exceptional circumstances exist for the release. Of greenbelt.

In conclusion, the housing targets set by Knowsley Council are too high (given the recent 2012-based population forecasts). Density assumptions are too low. More land is being considered for removal from the Greenbelt, than is actually required. Too much of the land being considered for removal from the Greenbelt is of high quality, highly productive agricultural land. Allocation of some Greenbelt sites as reserve sites for housing, will result in harm to the Greenbelt, and undermine it's aims and objectives

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you 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**

Paul Woods

**Date** 6<sup>th</sup> Nov 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE  
12 NOV 2014  
RECEIVED

Knowsley Council

### RETURNING THIS FORM

Please return form to be received by Knowsley Council by 12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	PAULINE JONES	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS14

Policy Ref

Paragraph Ref

EJ

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness 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 plan as areas not released from Green Belt (Big Water + Old Wood) would result in an influx of residents ~~to~~ trying to use the small area and thus render this natural landscape unsustainable for wildlife.

Continue on a separate sheet if necessary...



4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Please take account of Eric Pickles (Oct 14) comments.

No Green belt land should be used until all available "Brown field" sites have been used, including the old BICC sites on Manchester Road.

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

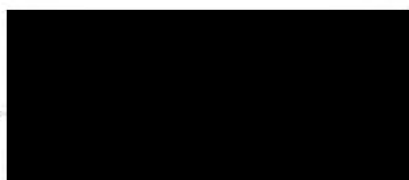
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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 <b>MR</b>		
Name <b>MONAGHAN</b>		
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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**PART B - YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation PETER MONAGHAN

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref KGBS14 Paragraph Ref EC2

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
a) Legally Compliant? (see guidance note 2.2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

DUE TO THE INCREASE IN TRAFFIC ONTO WARBUCK ROUNDABOUT THE INCREASING STRAIN ON THE DRAINAGE SYSTEM AND HUGE STRAIN ON THE AREAS LAND TO ACT AS A SOAK AWAY TO DISPERSE RAIN WATER WHICH THE GREENBELT LAND IS PROVIDING AT THE MOMENT, THE RISK OF FLOODING TO THE PROPERTIES NOW PRESENT AND ANY NEW DEWLINGS IS CONSIDERABLE.

*Continue on a separate sheet if necessary...*

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

THE GREEN BELT LAND IN SOUTH WHISTON SHOULD NOT BE REMOVED FROM THE GREEN BELT. AND ALL PROPOSED BUILDING RESIDENTIAL AND INDUSTRIAL SHOULD BE UNDERTAKEN ON BROWN FIELD SITES WITH THE KNOWSLEY BOUNDARY..

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

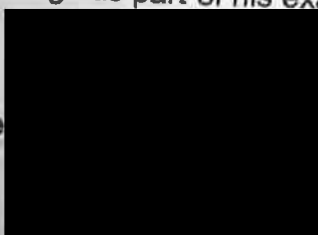
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**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

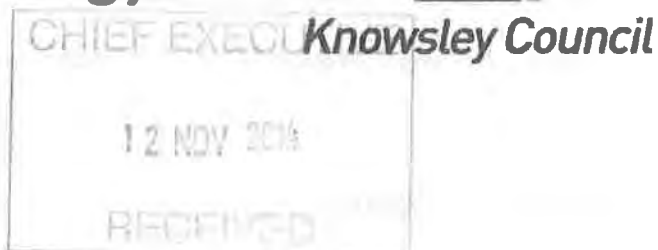


Date



# 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	PHILLIP JENNINGS	
Job Title (if appropriate)	FINANCIAL ADVISOR	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation PHILLIP JENNINGS

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref KBS14 Paragraph Ref ECS

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

I THINK IT IS NOT SOUND BECAUSE ALL THE IMPROVEMENTS THAT THE PROPOSALS SUGGEST WILL HAPPEN ARE UNPROVEN. NO GUARENTEED PLAN HAS BEEN PUT FORWARD AND TO SACRIFICE GREEN BELT LAND WITHOUT A GUARENTEE IS UNACCEPTABLE

*Continue on a separate sheet if necessary...*

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

THE GREEN BELT LAND MUST NOT BE USED AND DEVELOPED AT ANY COST, ESPECIALLY WHEN THERE ARE PLENTY OF LAND THAT COULD BE USED AS AN ALTERNATIVE. I MOVED TO THE AREA TO LIVE NEAR TO THE COUNTRY SIDE, TO DEVELOP THE LAND WILL EFFECTUVELY PUT ME IN THE MIDDLE OF A LARGE HOVING ESTATE. TARBOCK ROAD ROUNDABOUT AND WINDY ARBOR ROAD IS ALREADY UNABLE TO COPE WITH TRAFFIC ALSO, IN VIEW OF KNOWSLEY COUNCILS PAST RECORD ON JOB CREATION AND OTHER ISSUES THAT HAVE BEEN IN THE NEWS, THE PLANS THAT THEY SUGGEST ARE BOUND TO FAIL, BECAUSE THEY ARE NOT CAPABLE OF IMPLEMENTING THESE CHANGES. Continue on a separate sheet if necessary...

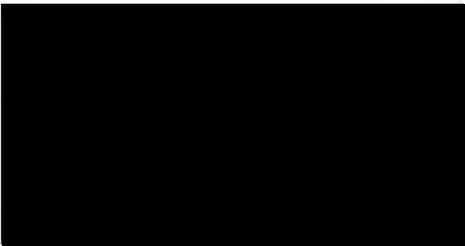
ALSO, IF THE HOUSES ARE CONSTRUCTED BY THE SAME DEVELOPER AS THE ONE WHO BUILT THE HOUSES AT LABLES RETAIL PARK THEY WILL LOOK HIDEOUS AND CHEP.  
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/14

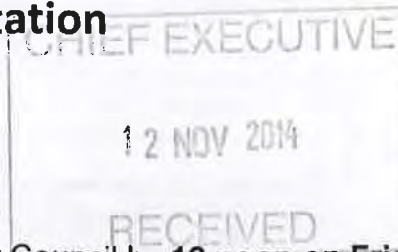




# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	PHILIP JONES	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

~~M168~~ <sup>KGBS 14</sup>

Policy Ref

~~SUE 1~~ <sup>KGBS 14</sup>

Paragraph Ref

~~E1~~ <sup>E1-E9</sup>

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 wish to object to this plan as the release of the last Green belt within the South Whiston area will exacerbate our lovely village and its identity and character as a village community will be lost forever.

Continue on a separate sheet if necessary...



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

To make this plan sound, please take into consideration the comments from Eric Pickles (Oct 14).

All Brownfield sites used before considering "Green belt."

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

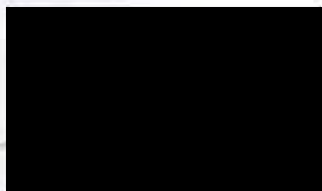
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

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#### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Philip Williamson	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	email	

*\*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

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.

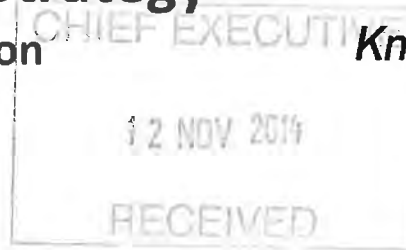
The law states that Greenbelt cannot be developed except as a last resort, and the circumstances which constitute this have not been proven by any stretch of the imagination. If the government is against greenbelt development, if the council was reluctant to use the greenbelt in its plan, and if the 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.



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	R Martin	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I object  
Because we have enough Brown field sites so we  
do not need to build on Green belt

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I object to the plans to build on Green belt.  
We do not have enough diversity in greenery in this area as it is. So building on Green belt would only diminish what variety we do have. Please think about the effect on wild life, think about the bees and the butterflies. This country is expected to get wetter. So concreting over fields will cause more runoff in to local rivers and streams causing flooding.

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.


5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you 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



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





The Coal  
Authority

**Knowsley Local Plan Core Strategy (Proposed Modifications)**

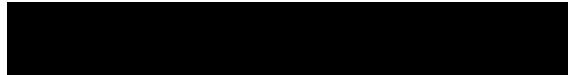
**Consultation Deadline – 13 November 2014**

Contact Details

Planning and Local Authority Liaison Department  
The Coal Authority



Planning Email:  
Planning Enquiries:



Person Making Comments



Consultant Planning Advisor to The Coal Authority

Date of Response

24 September 2004



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Rachael Bust	
Job Title (if appropriate)	Chief Planner	
Organisation (if appropriate)	The Coal Authority	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref  Policy Ref  Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

	Yes	No
a) Legally Compliant? (see guidance note 2.2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Sound? (see guidance note 2.3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The Coal Authority supports this modification

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

N/A

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

Signature

[Redacted Signature]

Date 24 September 2004

## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

The Coal Authority

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M225 (PM71)

Policy Ref

CS25

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

Yes

No

c) Legally Compliant? (see guidance note 2.2)

d) 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 Coal Authority supports this modification

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

N/A

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

c) No, I do not want to participate at any further public hearing

d) Yes, I wish to participate at any further public hearing

**Signature**

[Redacted Signature]

**Date** 24 September 2004

## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

The Coal Authority

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M272

Policy Ref

Appendix  
r

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)

f) 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 Coal Authority does not object to the allocation of the proposed Sustainable Urban Extensions. We note that SPDs are proposed to be produced for the Knowsley Lane, Huyton and South of Whiston and Land South of M62.

The proposed modifications relating to Policy CS2 and Policy CS25 do address our agreed position regarding mineral safeguarding and mining legacy. We note that some cross referencing is included within the new SUE policies to other plan policies.

However as specific Allocation Profiles are included within the Plan as a Modification we consider that the issue of mineral sterilisation prompting the need to consider the prior extraction of mineral resources and the presence of land instability should be identified in the 'Key Site Constraints and Opportunities' sections of relevant SUEs.

**4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.**

In the specific Allocation Profiles we consider that the issue of mineral sterilisation prompting the need to consider the prior extraction of mineral resources and the presence of land instability should be identified in the 'Key Site Constraints and Opportunities' sections of relevant SUEs. In particular this should be identified for the Knowsley Lane, Huyton and South of Whiston and Land South of M62 SUEs.

The Coal Authority considers this to be necessary as a result of this DPD now undertaking the allocation of these sites. The NPPF in paragraphs 109, 120, 121, 143, 144 and 166 requires this information to be taken into account in the site allocation process.

These issues will impact on the deliverability and viability of these SUEs.

As we have identified in our response to the consultation on the proposed SUE SPDs, The Coal Authority has made GIS data available to LPAs on these issues, the latest releases of this data was notified to Knowsley as being available to download on the 6 August 2014. This data does not yet appear to have been downloaded from our GIS portal. The nominated contact in Knowsley is [REDACTED], Principal Application Support Officer in GIS Management in Development Control.

It is important that you download and utilise this latest data as our records of surface coal resource and mining legacy change on a continuous basis as new information becomes available.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

e) No, I do not want to participate at any further public hearing

f) Yes, I wish to participate at any further public hearing

**Signature**

[REDACTED]

**Date** 24 September 2004





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Ray Davis	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt Action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Whiston Green Belt Action Group

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

SD32,KGBS14,  
CS5,SUE2C,CS22,  
CS21

Paragraph Ref

See below

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CS1 to 5, AD51 and the SUE documents are out of step with Public opinion, I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill. I consider the council have not utilised empty properties and brown field sites in its calculations of housing needs. The council have not considered infrastructure improvements to cope with the influx of people.

Paras:

3.2to3.24, 3.26,4.10,5.44to5.51,5.82to5.86,5.133to5.138,5.156,5.157,5.159,5.177,5.179,5.181,5.183,5.184

See attached sheets

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Carry out an up to date housing requirement survey taking into account the latest figures from the Office of National Statistics, 2014.

Carry out a relevant up to date Traffic Management survey, taking into account the existing loads at peak times and the additional loads placed upon the area with an influx of at least 3000 additional vehicles.

Consider the impact on local services such as Doctor, Dentist, Schools, etc.

Insist that empty properties and brown field sites are developed before considering Green Belt release, and used to satisfy the 5 year plan. Brown field sites may well have the infrastructure already in place to cope with additional housing.

Put back any Green Belt release until end of plan period, and even then consider all other areas, green belt release should be the last resort, not the first action

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



ate 03/11/2014

## KNOWSLEY LOCAL PLAN: CORE STRATEGY

### Submission and Objections regarding proposed modifications

Ray Davis  
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

Implications for South Whiston and Prescot Town Centre – Please see my comments highlighted in red.

3.20 The appraisal concluded that the Spatial Strategy for Knowsley is likely to have a largely positive impact on the sustainability objectives. In particular, it is envisaged that the Development Principles (CS2) are likely to have a major positive impact in the long-term on the objectives relating to health; mitigating climate change; and reducing the need to travel. It was concluded that the policies for Housing Supply (CS3), the Economy and Employment (CS4) and Town Centres and Retail (CS6) would have a positive impact on a range of objectives, particularly those that relate to social and economic issues and the appraisal also predicted that the policy for Green Infrastructure (CS8) would have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; adapting to climate change; and green infrastructure.

**I would question how removing green belt can have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; and adapting to climate change.**

3.21 The appraisal of the Proposed Submission document did however consider that a number of the policies would have an uncertain or negative impact on some of the objectives. For instance, it concluded that a number of the policies, such as the Spatial Strategy (CS1) and Green Belt (CS5) could have an uncertain impact on a number of environmental objectives in the longer term due to the potential for it to result in the release of a number of sites in the Green Belt.

**How can this statement hold true to statement at 3.20 one is negative and one positive?**

3.23 Nevertheless, the appraisal of the Proposed Submission document acknowledged that as each of the policies would result in built development and would therefore lead to some carbon emissions associated with the construction and operation of this development, their impact on the objective relating to mitigating climate change is uncertain. It also considered that there is some uncertainty over the impact of the policy for Knowsley Industrial and Business Parks (CS11) on the objectives relating to air quality and need to travel, particularly as there is limited information available on the amount and nature of the new employment uses that would be delivered. In addition, due to

both policies resulting in the provision of B1 office development in an out of centre location, the impact of the policies for Knowsley Industrial and Business Parks (CS11) and South Prescott (CS13) on the objective relating to the vitality and viability of Knowsley's town centres was also deemed to be uncertain.

**The actions contained within the Local plan are identified here as uncertain and would certainly fail in meeting our green credentials as the development of green belt out of centre would increase the carbon impact.**

3.24 On the whole, the appraisal of the Proposed Submission document concluded that the Thematic Policies performed well in the SA process. In particular, the policies relating to housing and the accommodation needs of the community (CS 15 – CS18) were considered to all have a positive impact on the objectives relating to poverty and deprivation; health and the provision of good quality housing; the policies relating to Sustainable and Low Carbon development (CS22) and Renewable and Low Carbon Infrastructure (CS23) were considered to have a major positive impact on the objective relating to mitigating climate change; and the policy for Greenspaces and Trees (CS21) was considered to have a major positive impact on the objectives relating to landscapes; biodiversity; adapting to climate change; and green infrastructure.

**How can this point be made as positive when the document already highlights the possibility of a negative impact on all of the CS range of reports?**

*Proposed Modifications to the Submission Local Plan*

3.26 The initial Local Plan Examination hearing sessions took place in November 2013. Following these hearing sessions, the Inspector appointed to undertake the examination issued his interim findings in January 2014. In response to these findings, and also to reflect other required amendments, the Council proposed a number of modifications to the Plan. These modifications included a revised approach to the release of Sustainable Urban Extensions, a reduction in the employment land target for the plan period, a reduced target level of affordable housing provision on sites in the urban area and the prioritisation of different forms of developer contributions in instances where viability is insufficient to fund all the non-mandatory requirements set out in the Plan.

**The reduced level of affordable housing can only be in the favour of developers, government guidelines call for a level of 25%. A reduced level of employment land means that the target of job creation must be flawed.**

4.10 The scale of any impact on an objective has been predicted taking into account the size of the site and the quantum of development it is likely to accommodate. In relation to housing sites, where an approximate number of dwellings that could be accommodated on a site have not been provided by the promoter of the site, its yield has been estimated based on the standard multipliers used for assessing the capacity of sites within the Strategic Housing Land Availability Assessment



(SHLAA) and the Green Belt Study. For sites in excess of 2 hectares in site size, this assumed a 75% net developable area and a density of 30 dwellings per hectare<sup>13</sup>.

**In the case of South Whiston, 75% of the proposed area of 110.3 hectares minus 27.6 = 82.70 hectares @ 30 dwelling per hectare is 2481 dwellings. The council have only declared 1503 dwellings. This calls all of the council's estimates of housing into question. The proposal to bring forward Green Belt release on such a scale will also produce many more houses than the SHLAA calls for. Also the government has in October 2014 told councils to use the NPPF to protect Green Belt.**

## **“Councils must protect our precious green belt land”**

From: Department for Communities and Local Government, Brandon Lewis MP and The Rt Hon Eric Pickles MP

First published: 4 October 2014 # Last updated: 6 October 2014

Part of: Improving the energy efficiency of buildings and using planning to protect the environment, Climate change, Environment and Planning and building

### *SUE 2c – Sustainable Urban Extension: South of Whiston and Land South of M62*

5.44 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the further modifications to the policy would remove the specific reference to housing in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require the development to provide a wider choice of housing in the area. Consequently, given the substantial capacity of the site, it is considered that the policy has the potential to have a positive impact on the objective of providing good quality housing and this impact would become increasingly significant as the development is built out. The policy also promotes a significant amount of employment development in this location and, due to the scale of development that would be delivered, could also encourage further investment in the area, generate employment and training opportunities in the construction sector and help sustain existing local facilities. As such, the policy could also have a major positive impact on the objectives that relate to business growth and productivity; and reducing unemployment; and some positive effect on the objectives concerned with poverty and deprivation; and education and skills.

**Any employment gains in the building industry are short term and will have little impact on local unemployment. With the reduction in affordable housing previously mentioned (3.26) how can the massive scale of over 2400 houses have a beneficial effect, without considerable investment in infrastructure. There are only two local primary schools, I question if they would have the capacity to cope with this massive**

development. Already in (3.21 & 3.22) the question of environmental and green space negative impacts have been mentioned, a development on this scale would surely cause a negative impact on all those areas mentioned.

5.45 The policy would also result in residential development being directed to a location that is within reasonably close proximity of established employment areas and a number of local facilities, including primary schools, a GP and health centre and a local shopping centre on Greenes Road. It also requires new development in this location to contribute towards public transport provision and improve links to Whiston railway station. As such, the policy could have a positive impact on the objectives that relate to improving access to services and amenities; and the use of more sustainable transport modes.

Local transport in Whiston is very poor and anyone who is not a car owner and lives on Windy Arbor Road, has already seen a reduction in buses available since de-regulation. To suggest building a large number of houses will increase local transport is naïve in the least and downright misleading. The development by Halton in Cronton has not seen a vast increase in bus traffic and hardly a bus is available late at night. The local shopping centre mentioned is log jammed at busy times with cars and deliveries by Artics to Tesco and the odd truck using Whiston as a short cut from Tarbock island. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.46 Given the scale of development promoted, the policy has the potential to generate a significant amount of additional expenditure which could support nearby local centres. As such, the policy has the potential to have a positive impact on the objective that relates to the vitality and viability of town and local centres. In addition, a key element of the proposals for the site is the creation of a country park with associated footpaths, cycleways and bridleways, and the policy also requires development in this location to encourage walking and cycling and provide public open space. As such, it is considered that the policy could support participation in sport and recreation and could therefore have a positive impact on the objective that relates to health.

Why it is necessary for so much land to be considered for removal from the Green Belt, to the south of the M62. Only about a third of this is reported to be for development. It has been said that the rest will form a Country Park, on the Old Cronton Colliery site. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.47 The policy would however have the potential to have a negative impact on a number of objectives. In particular, it directs development to a greenfield site that contains large areas of Grade 2 Best and Most Versatile agricultural land. As such, the policy would have a major negative impact on the objective that relates to protecting land and soil. Directing development to this location would also have a negative impact on the objective that relates to protecting landscape character;



and could have a negative impact on the objective that relates to biodiversity by resulting in the loss of priority habitat and/or by placing pressure on nearby Local Wildlife Sites. Nevertheless, there is only a low level of certainty about the impact of the policy on this objective.

**There is a clear admission here of the negative impact of taking this area out of Green Belt. With the increase in Global commodity prices locally produced food is more important. The need to remove Grade 2 Best and Most Versatile agricultural land from the Green Belt is not proven and 5.47 highlights the negative impact of this policy.**

5.48 The policy will result in development taking place in a location that is within reasonably close proximity to local facilities and would also require the development to contribute towards public transport, walking and cycling. However, the construction and operation of this development would inevitably result in carbon emissions and would inevitably generate a significant number of vehicular trips and associated emissions. Consequently, the policy has the potential to have some negative impact on the objectives that relate to mitigating climate change; and protecting air quality.

**There is a clear admission within (5.48) that the development proposed is identified as having a negative effect on carbon emissions and would certainly fail in meeting our green responsibilities. The mention of a significant number of vehicular trips bears out our belief that there would be a serious impact on traffic congestion within Whiston.**

5.49 The policy would also have an uncertain impact on some of the sustainability objectives. Specifically, the policy would result in development being directed to a location that is in close proximity to a number of heritage assets. Nevertheless, due to the scale of the site, there may be scope to incorporate an adequate buffer around these assets to protect their setting. In addition, the policy requires development in this location to comply with Policy SUE 2 which, amongst other things, requires new development to protect and enhance historic and architectural assets. As such, it is uncertain whether the policy would have a significant impact on the objective that relates to preserving and enhancing Knowsley's built heritage.

**These comments can only reinforce the need for a structured approach to any release of Green Belt and more time should be spent understanding all the issues before we take a decision that cannot be revoked.**

5.50 Although the policy directs development to a greenfield site which has the potential to function as part of the Borough's Green Infrastructure network, it also involves the creation of a country park and the requirement for development in this location to be subject to a master planning should ensure the appropriate retention and provision of objective that relates to providing and conserving green infrastructure is also considered to be uncertain. Areas of

Green Infrastructure. As such, the impact of the policy on the objective that relates to providing and conserving green infrastructure is also considered to be uncertain.

**(5.50) Again mentions uncertainty in the council decisions and in my view at least suggests they don't know what will happen when developers have free reign to build on our Green Belt. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.**

5.51 Similarly, although the policy would result in development taking place in the vicinity of a number of water bodies, there is limited certainty over whether this would impact on the water quality of these waterbodies. Consequently, it is considered that the policy would also have an uncertain impact on the objective of protecting, improving and where necessary, restoring the quality of inland, and estuarine waters.

**We have yet to see a definitive study of water quality after development, and we suggest the loss of some 110 hectares of open countryside will seriously impact local wildlife**

#### *KGBS 14 - South of Whiston*

5.82 Policy SUE1 identifies South of Whiston as a SUE primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development including the Local Wildlife Site but excluding Public Open Space. This option would not introduce any phasing restrictions but would include a policy requirement for ancillary facilities (e.g. Retail and Public Open Space). The second option considered was to allocate the site for housing development with site-specific allocations for retail and Public Open Space provision but no phasing restrictions. The third option was to allocate the entire site for housing development with no phasing restrictions.

**We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision.**

5.83 The appraisal concluded that each of these would have a similar impact on a number of the sustainability objectives. In particular, given the substantial capacity of the site, it concluded that each option could have a major positive impact on the objective of providing good quality housing and that this impact would become increasingly significant as the development is built out. However, by introducing a potentially inflexible approach to the provision of open space and retail, the appraisal recognised that Options 2 could have an adverse impact on the deliverability of the site which reduces the level of certainty that the option would have a major positive impact on the objective. Due to the size of the area and the quantum of development it could accommodate, each of the options could also generate a number of employment and training opportunities in the construction sector and

could stimulate further investment in the area. As such, the appraisal noted that each of the options has the potential to have a positive impact on the objectives that relate to reducing deprivation; skills and training; business competitiveness; and unemployment.

**Once again there is too much that is hopeful and of little certainty and i would re-iterate my previous comment. We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision. This decision is at odds with local Public opinion and also at odds with the localism bill.**

5.84 The appraisal considered that each of the options would also result in development taking place in close proximity to a range of local facilities and amenities including primary schools, a GP and health centre and a local centre on Greene's Road and development in this location could make a contribution to the continued viability of these services and facilities. Options 1 and 2 would also support the provision of certain facilities/amenities within the site. As such, each of the options could have a positive impact on the objective that relates to access to services and amenities but there is a higher level of certainty that Options 1 and 2 would have a positive impact on this objective due to these options resulting in the provision of facilities on-site. Given the significant capacity of the site, each of the options also has the potential to have a positive impact on Knowsley's town centres and the local centre on Greene's Road by increasing levels of expenditure in these centres. As such, each option could have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town centres

**The retail centres mentioned at Greenes Road is a small satellite and little could be done to expand it. Increasing the footfall would inevitably increase traffic in what is already a very congested area. An increase in local population will only put more pressure on what is an already stretched NHS provision.**

5.85 The appraisal did however recognise that each of the options could impact upon the setting and significance of a number of heritage assets and have a negative impact on the objective that relates to Knowsley's built heritage. These assets are however located towards the edges of what is a large site and there may be scope to incorporate an adequate buffer around these assets to protect their setting. Consequently, there is only a limited level of certainty that each option would have a negative impact on this objective. By resulting in the loss of a significant area of greenfield land and by potentially placing pressure on areas of ecological value, each option could also have a negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the

objective that relates to air quality. There is however a lower level of certainty that Options 1 and 2 would have a negative impact on this objective as both of these options would support the provision of some facilities on the site which could reduce the need to travel and associated vehicle emissions. Each option could also have a major negative impact on the objective of adapting to climate change; a negative impact on the objective of mitigating climate change; and an uncertain impact on the objective that relates to protecting water quality.

**Once again the councils own comments highlight the negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the objective that relates to air quality, and also increase congestion.**

5.86 Each option would result in the loss of a substantial area of greenspace, sections of which are used for informal recreation, and could therefore reduce opportunities for participation in informal sport and recreation and thereby have a negative impact on the objective that relates to health. Nevertheless, Options 1 and 2 would provide support for the retention/provision of areas public open space and could therefore have a positive impact on the objective. Conversely, Option 3 would not support the retention/provision of areas public open space and would therefore have a negative impact on the objective. Options 1 and 2 would also result in the provision of some facilities on the site which could help reduce the need to travel and have a positive impact on the objective that relates to reducing the need to travel and improving the use of more sustainable transport modes. By contrast, as Option 3 would not directly support the provision of on-site facilities, this option has the potential to have a negative impact on this objective.

**Once again the councils own comments highlight the negative impact on outdoor activities and recreation for local people.**

#### *CS5 - Green Belt*

5.133 The revised policy would have a largely similar impact on the sustainability objectives to the version of the policy included in the Core Strategy Submission document.

**The use of Green Belt for building is overwhelmingly opposed by the majority of residents. The reason used by the council for use and early release of Green Belt does not meet the NPPF in regard of the 5 purposes of Green belt and Extraordinary needs do not exist, to remove Best and Most Versatile agricultural land. It is also at odds with latest government thinking. See 4.10**

5.134 The policy would continue to protect the majority of Green Belt from inappropriate development but, as with the previous version of the policy, would support the identification of a series of sites for release from the Green Belt to ensure that there is sufficient housing and employment land to meet the needs of the Borough. However, the proposed modifications to the policy would mean that the release of these Sustainable Urban Extensions (SUEs) is no longer controlled by a phasing mechanism and the modifications would also result in these sites being allocated for development rather than just identified as broad locations. These modifications mean that the SUEs would now be more likely to come forward earlier in the plan period. As a result, many of the impacts that would have occurred in the longer term under the version of the policy included in the Core Strategy Submission document would now occur earlier in the plan period under the revised policy.

**The rapid release of Green Belt land can only be to the benefit of developers and will put back development of brown field sites. The council admitted at the hearing that early release of Green Belt will result in the delay of development of brown fields, and this too is highlighted by latest government thinking, see 4.10. The proposal to release Green Belt early is a poor decision not made in the best interests of local people. We will quickly see what a poor decision it was.**

5.135 By continuing to support the identification of SUEs and safeguarded land for housing and employment development the amended policy would continue to ensure that there is sufficient land to meet the Borough's development requirements. It is therefore envisaged that the revised policy would still have a positive effect on the objectives relating to poverty and deprivation; housing; the growth potential of business sectors; and maintaining high and stable levels of employment. However, as noted above, these impacts are now predicted to occur earlier in the plan period. In addition, by potentially resulting in the SUEs coming forward earlier in the plan period, the modifications to the policy could result in the SUEs competing with the Council's regeneration objectives for urban areas. As a result, the modifications to the policy reduce the level of certainty that it would have a positive impact on the objective that relates to poverty and deprivation.

**The proposal to release Green Belt early will impact on the council stated regeneration objectives. Little in the way of long term employment will come from vast housing estates, only a greater demand on roads, schools, GP's and a lowering of air & water quality with an increase in noise pollution.**

5.136 In addition, as the amended policy would result in some housing and employment development taking place in areas on a series of predominantly greenfield sites that are presently within the Green Belt, it could have a negative effect on the objective relating to land and soil and an uncertain effect on the objectives relating to landscape character and accessibility; and Green Infrastructure. Key mitigation measures to address some of these impacts will include ensuring new

development is built to an appropriate density, retaining areas of woodland, securing the provision of on-site open space, and securing appropriate landscaping to moderate the impact of proposals on the local landscape character.

**I have already called into dispute the density quoted by the council as the proposal in South Whiston and the Council average density of 30 dwellings per hectare is significantly above the information they have given the public and what they have consulted on. Consultation is 1503 against 2481 according to calculation using average density(4.10). Latest planning applications are far in excess of what the public were told, Recently Knowsley gave outline planning permission for 207 dwellings at Bank Lane, Kirkby (even though the site is still in the Green Belt). This is a difference of 76 dwellings, and represents a 58% increase on the capacity that Knowsley Council said the site had.**

5.137 As some of the SUEs are used for informal recreation and others contain sports pitches, it is considered that the revised policy could also still have a long term negative impact on health. The proximity of some of the locations to designated heritage assets and the presence of archaeological assets within some of locations mean that the revised policy would also still have an uncertain impact on the objective relating to built heritage in the longer term. It is also considered that the policy still has the potential to have a negative impact on the objective relating to biodiversity. Undertaking ecological surveys, excluding areas of priority habitat from the developable area and the provision of on-site habitats are all likely to be key mitigation measures. However, as noted above, these impacts are now predicted to occur earlier in the plan period.

**Uncertain impact on archaeological assets within the area will be compromised. We have not seen Ecological research to discredit the assertion that removing this area from Green Belt will not have a catastrophic effect. The modifications will bring the ecological disaster forward, so that we may see them before our Grandchildren do.**

5.138 The revised policy still would have the potential to result in more dispersed patterns of development. In addition, the construction and operation of the development that would be delivered on the SUEs would inevitably result in carbon dioxide emissions. Consequently, and notwithstanding the fact that the Knowsley Local Plan Transport Feasibility Assessment (2012) identified that some of these locations have good accessibility to bus routes, cycle routes and services and facilities, it is considered that the revised policy would still have an uncertain effect on the objectives relating to mitigating climate change; protecting air quality; and minimising the need to travel.

**This point is broadly supporting our ascertainment as to the detrimental impact on traffic within the area. Local People contest the accuracy of the Knowsley Local Plan Transport Feasibility Assessment (2012) as our research carried out by local people show more than 400 vehicles per 30 minute session at peak times and if deliveries took place to Tesco with Artic then the whole area became log jammed. Only one bus per**

**hour was spotted until 7pm when the service stopped. We would assert that the transport assessment is out of date and not relevant to the increase in traffic we have seen and would call for another assessment to be carried out.**

*CS14: Principal Regeneration Area – Prescott Town Centre*

5.156 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process. The revised policy would still direct investment to Prescott town centre and would seek to intensify its retail function, encourage a wider mix of uses and create a distinctive identity and a complimentary evening economy. As such, the revised policy would still have the potential to have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town and local centres. The amended policy wording does however remove some of the restrictions placed on retail development in Cables Retail Park. In particular, it is no longer specified that retail development within Cables Retail Park should provide for convenience or bulky goods retailing and should maintain the current retail floorspace capacity of the Retail Park. These amendments could increase the scope for further investment in the Retail Park and result in a consequential reduction in investment in Prescott town centre, particularly as the Knowsley Local Plan Economic Viability Assessment (2012) indicates that comparison retail in Prescott town centre is generally unviable in current market conditions. This reduces the level of certainty that the revised policy would have a positive effect on the objective.

**Prescot town centre is run down and irrelevant in retail terms, even the council have had to move offices to an ex pub at vast expense, just to fill another empty building. When the council allowed Tesco to build a massive supermarket at Cables Retails park it as good as sounded the death knell of Prescott town centre. (5.156) Broadly agrees with our assessment.**

5.157 By reducing the level of certainty that the policy would support investment in Prescott town centre, these proposed amendments mean that there is also a lower level of certainty that the revised policy would have a major positive impact on the objective that relates to protecting and enhancing Knowsley's built heritage.

**Not proved**

5.159 There are no anticipated negative effects on the sustainability objectives. The proposed modifications would not however prevent the policy from having an uncertain impact on the objective relating to mitigating climate change

**Not proved. Agrees with earlier points that state the policy with have a detrimental effect on climate change.**



5.177 The revised policy also still encourages the re-use of vacant and underused historic assets and states that favourable consideration will be given to schemes that enhance the importance of the asset for the economy. The policy could thereby result in the creation of premises for new businesses. In addition, protecting and enhancing buildings and features of historic interest should help create more attractive places to invest in and could lead to enhancements to Prescot town centre. Consequently, the amended policy would also continue to have the potential to have a positive effect on the objectives relating to poverty and deprivation; increasing the number of new businesses; enhancing the vitality and viability of town and local centres; and maintaining high and stable levels of employment and reducing long-term unemployment.

**Developers will not consider run down existing areas, whilst vast areas of Green Belt are available, which are considerably easier to develop.**

*CS21: Green spaces and Trees*

5.179 The proposed modifications to the policy would have some impact on the performance of the policy against a number of sustainability objectives. In particular, although the revised policy still seeks to resist new development which would result in the loss of greenspace and would provide support for the provision of new areas of greenspace, the modifications to the policy mean that it would now encourage the retention of existing trees and woodlands and the appropriate planting of new trees rather than require this. This amendment to the policy wording is considered to reduce the level of certainty that existing trees would be retained and new planting secured. Consequently, whilst it is considered that other aspects of the policy would ensure that it continues to have a major positive impact on the objectives that relate to landscape character and green infrastructure; and a positive impact on the objectives that are concerned with adapting to climate change; mitigating climate change; water quality; and air quality; it is considered that this modification results in only moderate certainty that the policy would have a positive effect on these objectives.

**Once Knowlsey has shown itself to be open to removing Green Belt from protection, future planning applications will use this behaviour to push for more releases. This is a slippery slope that Knowlsey council have embarked on which will create a borough which only has an ex tip and non-public green space.**

5.181 The revised policy would still seek to resist the loss of greenspace and would provide support for the improvement of existing public open spaces and encourage the provision of new greenspaces. It could therefore help provide opportunities for participation in sport and recreation which would have a positive effect on the objectives relating to health; and poverty and social deprivation. It is however recognised that the provision of opportunities for sport and recreation does not necessarily guarantee engagement in these activities and, as a result,

there is only a low level of certainty about the effect on these objectives.

**I would welcome the opportunity to see where Knowsley believe they can get new green spaces from? Also the council have overstated the positive impact on health, poverty and social deprivation that a vast estate of houses can have. It is more likely that this influx of residents could also increase anti-social behaviour.**

*CS22: Sustainable and Low Carbon Development*

5.183 It is envisaged that the proposed modifications to the policy for Sustainable and Low Carbon Development would have a number of impacts on its performance in the sustainability appraisal process. The amended policy still requires development to incorporate a range of measures which would improve its sustainability. Nevertheless, the removal of the requirement for new development to achieve particular Code for Sustainable Homes/BREEAM standards and the removal of the requirement for development to incorporate decentralised and low carbon energy, means that there is a lower level of certainty that the policy would have a major positive effect on the objective that relates to mitigating climate change. Similarly, by not requiring new development to achieve particular Code for Sustainable Homes/BREEAM standards it is considered that the policy is less likely to result in new developments which incorporate water conservation measures or make use of recycled materials. As such, the proposed modifications mean that there is a lower level of certainty that the policy would have a positive impact on the objectives that relate to minimising the production of waste and increasing recycling rates; and ensuring the prudent use of water and mineral resources.

**To remove the need for developers to meet Code for Sustainable Homes/BREEAM standards is another nail in the coffin of our councils green credentials. It is a bizarre decision at the start of the 21<sup>st</sup> century, particularly as we all face the prospect of climate change. The demand on energy, water and other resources is likely to be much higher.**

5.184 In addition, the removal of the requirement to achieve certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.

**Once again this point is totally at odds with other statements and shows that there would be a negative effect on the objectives that relates to poverty and deprivation; and health.**



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council

### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Ray Davis	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt Action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Whiston Green Belt Action Group

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055 to  
M065,

Policy Ref

SD32,  
SUE1,SUE2C

Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <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 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.

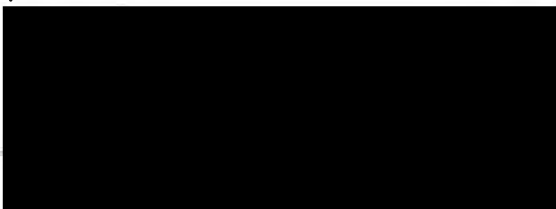
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

**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 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



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.

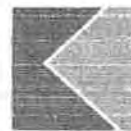
It is clear that the new rules within the NPPF instruct councils to ensure brown field sites are used before considering Green Belt and that Housing Quotas can't be used as an exceptional reason to release Green Belt.

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

**RETURNING THIS FORM**

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

**PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MR.	
Name	RAY GOUGH	
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

RAYMOND COUGH

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KCBS14

Paragraph Ref

E 1

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 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 20014  
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.

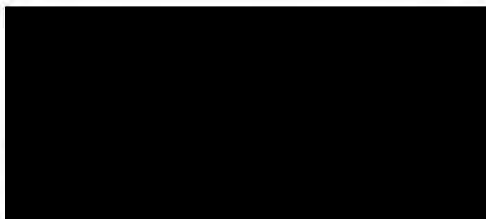
5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1/11/2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



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### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	ROBERT FAIRCLOUGH	
Job Title (if appropriate)	—	
Organisation (if appropriate)	—	
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	[REDACTED]	

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## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input 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.

I OPPOSE THE MOVEMENT OF LAND OUT OF GREEN BELT FOR DEVELOPMENT PURPOSES, WE NEED TO KEEP THESE AREAS OF GREEN BELT FOR WILDLIFE, HABITATS, ALSO FOR FUTURE GENERATIONS TO ENJOY. NO HOUSES

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and there is a further public hearing** as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date 4/ OCTOBER 2014/

[REDACTED]

---

**From:** Romilly Scragg [REDACTED]  
**Sent:** 13 November 2014 20:40  
**To:** Knowsley Local Plan  
**Subject:** Representation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Title - Ms

Name - Romilly Scragg

Address - [REDACTED]

Telephone - [REDACTED]

Email - [REDACTED]

**Further representations in regards to the Knowsley Core Strategy, in light of new information emerging (November, 2014)**

These notes form a representation regarding the emerging Knowsley Core Strategy, in respect of new developments, and the subsequent generating of new information since the sittings of the public inquiry (November 2013 and July 2014).

1. The land at Whiston and south of the M62 forms not only a barrier between the urban sprawl from St Helens and Liverpool but a welcome breathing space for Knowsley residents. It should be protected. Knowsley planners say any development proposals for South Whiston will be required to include "a network of public open space, cycling and walking routes in the site" and that the plan "proposes a new country park be created south of the M62 with enhancements to the Whiston to Cronton strategic green link". This is disingenuous in part (the latter part, as the country park is nothing to do with KMBC) and absurd in the other. "A network of public open space, cycling and walking routes" is paltry compensation for the loss of a large area of ancient, natural, open greenspace - and no compensation at all in terms of green barrier.

2. On Twitter by the Rt Hon Eric Pickles secretary of state for Communities and Local Government wrote: "Please remind planners that Councils must protect our precious green belt land". A press release issued by the Government in October 2014 reaffirms the Government's policy that "...once established, green belt boundaries should only be altered in exceptional cases, through the preparation or review of the Local Plan." When challenged on this, KMBC says the Inspector's Interim Findings "indicate that these exceptional circumstances justifying the alteration of Green Belt boundaries do exist in Knowsley". The inspector's findings were published before October 2014. Whoever's fault it was, the Government clearly believes too much Green Belt is being passed for development by inspectors who have been working to their earlier guidelines.

KMBC's director of regeneration [REDACTED] herself said more Green Belt had been developed in the past 5 years than in the 25 years before that.

It is clear that planners and planning inspectors are being encouraged to look again at circumstances they have previously accepted as "exceptional".

3. I gave evidence in my earlier representation that the public consultation was flawed at stages where the public could supposedly direct the basic design of the local plan in regard to loss of Green Belt. At the hearings, KMBC acknowledged thousands of leaflets had not been delivered. The inspector nevertheless found their consultation 'sound'.

In recent weeks and months, it has become abundantly clear that thousands of Knowsley residents did not know about the plan. 3,000 people have signed a petition. Hundreds of representations have been submitted and public meetings have been full to overflowing with residents who do not want their Green Belt taken away. I believe this matters. I believe that a council's consultation policy should be more than a box-ticking exercise. And I believe that what residents want to do with their home should be taken into account.

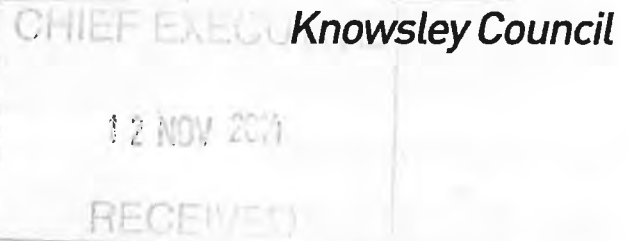
4. I urge the inspector to take particular note of the representation made by Paul Slater who has devoted inordinate amounts of time to checking over KMBC's findings. He is thorough and he is absolutely fair. He is not a full time planning consultant or planner. He does this off his own bat for the good of communities and for the countryside and for what is right.

Romilly Scragg, November 2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	RONALD PRESCOTT	
Job Title (if appropriate)	PRODUCT CONTROL	
Organisation (if appropriate)	CONVATEC	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref <sup>MOBS</sup> Policy Ref  Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                       |
|---|-------------------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

THERE HAS NO BEEN ANY PROPER CONSULTATION WITH THE LOCAL PEOPLE  
THERE HAS BEEN NO CONSIDERATION FOR THE LOCAL GREEN BELT, WHICH WAS DELETED OVER THE LAST 30 YRS  
THIS PART OF MERSEYSIDE NO SHORTAGE OF WASTE LAND IN THE PRESCOT AREA.  
GREEN BELT IS THERE FOR PEOPLE TO ENJOY AND STOP URBAN EXPANSION.  
Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature

[Redacted 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	ROY EASTON	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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**PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

**1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

K4BS14

Paragraph Ref

S.5

**2. Do you consider that the proposed modification is ? (please tick relevant box)**

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

I HAVE USED THE GREENBELT LAND HERE IN WHISTON FOR MY ENTIRE LIFE (OVER 50 YEARS). I PLAY FOOTBALL, I WALK MY PRESENT DOG FOR THE LAST 5 YEARS AND MY PREVIOUS DOG FOR 18 YEARS UNTIL SHE DIED IN 2008. I FEEL ITS AGAINST MY HUMAN RIGHTS TO TAKE AWAY THIS GREEN BELT LAND, ~~WHICH~~ (I USE DAILY) TO WALK THE DOG, AS ONCE HOUSES ARE BUILT ON THIS LAND THERE'S NOWHERE <sup>ELSE</sup> TO GO!

*Continue on a separate sheet if necessary*

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I FEEL THE INSPECTOR SHOULD NOT  
AGREE TO THE SALE OF GREEN-BELT  
LAND, AS THERE IS ENOUGH BROWN BELT LAND  
THAT COULD BE USED 1<sup>ST</sup>.

*Continue on a separate sheet if necessary*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

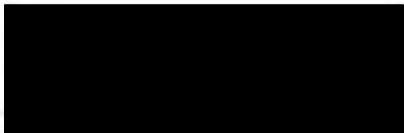
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

01 - NOV - 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	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.  
MILLS.

Policy Ref

SUE  
1/2c.

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

Continue on a separate sheet if necessary...

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- 1) INFORMATION SHOULD BE PROVIDED THAT A LAY PERSON CAN UNDERSTAND PLAIN / SIMPLE ENGLISH.
- 2) DUE TO THE LACK OF JOB OPPORTUNITIES WE FEEL MORE HOUSING IS NOT REQUIRED AS PEOPLE HAVE NO REASON TO MOVE INTO THE AREA.
- 3) DUE TO HISTORIC MINE WORKINGS THE LAND MAY BE UNSTABLE AND DANGEROUS TO BUILD ON.
- 4) THE DISTRUCTION OF THE GREENBELT / OPEN COUNTRYSIDE WOULD DESTROY THE HABITAT OF WILD LIFE ON THE PROPOSED LAND, I THOUGHT THE COUNCIL HAD A DUTY TO PROTECT WILDLIFE.
- 5) THE LOSS OF A TREMENDOUS AMOUNT OF GREENBELT / AGRICULTURAL LAND THAT PRODUCES FOOD.
- 6) THERE WOULD BE A MASSIVE STRAIN ON LOCAL INFRASTRUCTURE DUE TO OVER CAPACITY PUTTING MORE STRAIN ON SCHOOLS, DOCTORS, PUBLIC TRANSPORT AND THE NHS.

Continue on a separate sheet if necessary...

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.


**5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)**

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b) Yes, I wish to participate at any further public hearing

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Signature



Date

6/11/2014

UNACCEPTABLE HIGH DENSITY/ OVER DEVELOPMENT OF THE SITE WOULD LOSS THE OPEN ASPECT OF THE NEIGHBOURHOOD, REMOVING THE BUFFER BETWEEN WHISTON AND THE MOTORWAYS M57/62.

- 8) THE ROAD NETWORK IS ALREADY AT BREAKING POINT AT TIMES, MORE CARS WILL ONLY ADD TO THE CURRENT PROBLEM.
- 9) NEW HOUSEHOLDS ON GREENBELT LAND WILL CREATE NEW INCREASED CARBON EMISSIONS FROM INCREASED POPULATION, TRANSPORT ETC. ETC, WHERE THERE WAS ONCE GREENBELT. THIS IS CONTRARY TO THE GOVERNMENT'S POLICY TO REDUCE GLOBAL WARMING.
- 10) INCREASE IN TRAFFIC WOULD INCREASE NOISE, POLLUTION AND INCREASE IN CO<sup>2</sup> GASES WHICH COULD EFFECT THE HEALTH OF THE POPULATION IN WHISTON.
- 11) COUNCIL SERVICES ARE UNDER STRAIN AT PRESENT, DUE TO BUDGET CUTS, INCREASING THE HOUSING STOCK IN KNOWSLEY WOULD ONLY INCREASE THESE PRESSURES.
- 12) I URGE THE COUNCIL NOT TO CONSIDER BUILDING ON THE GREENBELT OR FARMLAND BUT TO UTILISE THE NUMEROUS BROWNFIELD SITES. THIS WOULD MORE THAN MEET THE CURRENT HOUSING DEMANDS IN THIS AREA.

WHEN GREENBELT LAND HAS BEEN DEVELOPED, IT'S LOST FOR EVER.



6/11/2024.

[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



Knowsley Council



### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	S. B. ALLPORT	
Job Title (if appropriate)	RETIRED FIRE OFFICER	
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 S B, All Port

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref  Policy Ref KGBS14 Paragraph Ref E5

2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I object to the removal of land at Whiston Green belt.  
To Build over 1500 Houses in Green belt 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

- Ⓐ take notice of int Eric Pickles comments on Green Belt land.
- Ⓑ take notice of ONS. on population.
- Ⓒ to have further public consultations regarding this matter.

Continue on a separate sheet if necessary...

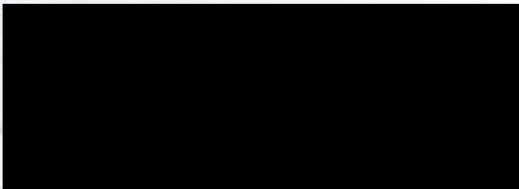
**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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Signature

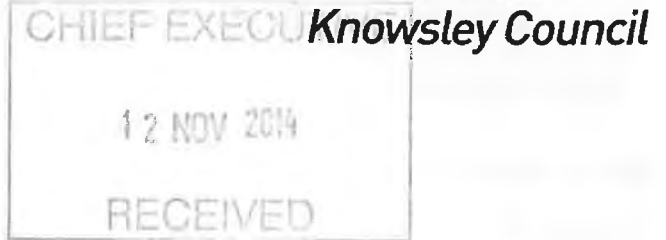


Date 01/11/2014



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



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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)

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 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

**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

[REDACTED]

---

**From:** sarah carr [REDACTED]  
**Sent:** 27 October 2014 21:23  
**To:** [REDACTED]  
**Subject:** Whiston Greenbelt Land

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To Whom It May Concern,

I write to you regarding Knowsley Council's local plan. Their plan includes the loss of greenbelt across Knowsley but I am particularly concerned with their plans for Whiston South. Generations of my family have grown up in Whiston enjoying the little bit of countryside the greenbelt provides us with. Whiston has gradually become a mass of houses, concrete and heavy traffic. There are many reasons that we, the people of Whiston and Cronton, are against these plans. Increased traffic, increased demand on public services, greater pollution to name but a few.

Knowsley Council repeatedly tell us that they wished to build on brownfield sites first but that the GOVERNMENT INSPECTOR has forced them to free up greenbelt early before using brownfield sites. This to me is a complete contradiction to the guidelines recently published by the government which insist that building on greenbelt land should only happen under 'exceptional circumstances.'

Local people have set up a group SAVE WHISTON'S GREENBELT to fight these plans and have successfully gained support, researching, advertising, leafleting the local community, petitioning and gaining media interest. A second consultation meeting was held in Whiston because of the huge response from residents.

I OBJECT TO ANY HOUSING BEING BUILT ON GREENBELT LAND, AS WE ARE ALREADY SNOWED UNDER WITH TRAFFIC AT THE TARBOCK ROUNDABOUT & WOULD HAVE A EVEN MORE DETRIMENTAL EFFECT ON OUR AREA IF THESE HOUSES WERE TO BE BUILT ASWELL AS OUR HOSPITALS, SCHOOLS & GP SURGERIES ALSO.

your sincerely, Sarah Carr, [REDACTED]





# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation

### Representations Form

Knowsley Council

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#### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	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 MINOLGY

### 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)

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 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  
Useful 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.

ONS 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

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Signature

[Redacted Signature]

Date

1.11.14



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	Mrs	
Name	Sarah-Jane Jarman	
Job Title (if appropriate)	n/a	
Organisation (if appropriate)	n/a	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Sarah-Jane Jarman

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

KGBS14

Paragraph Ref

ENTIRE  
PLAN

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                                 | No                                  |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

### **3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

I do not feel that the plan is sound. The circumstances are NOT exceptional. Like many who actually live in Knowsley (unlike the planners), someone who pays council tax to Knowsley, works in the local area and has children in the local schools (unlike the planners) I can see there is actually very little greenbelt left within Knowsley.

Statistically your plan suggests that there will be a reduction of greenbelt less than 10% however using this misleading statistic cannot hide the fact that the MAJORITY of greenbelt within Knowsley is either in private hands (predominantly the estate of Lord Derby) and therefore not accessible by the local residents, or is providing a barrier to the 2 major motorways, several expressways/bypasses and many, many dual carriageways we have here (again not accessible).

This area is socially deprived; releasing greenbelt to providing housing for yet more social housing is not going to increase the coffers in the way (it would seem) the planners consider probable. There are many empty homes within Knowsley already (including South Whiston) and without green spaces, there will be no way of attracting the affluence Knowsley planning seem to be seeking.

There are few jobs in our area, more people mean there will be even fewer chances for work opportunity and this can only increase the social burden we carry within Knowsley already.



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Eric Pickles Secretary of State for Communities and Local Government has been vocal in his advocacy for protecting our greenbelt, you have continually chosen destruction of the greenbelt over the correct and legal option of developing brownfield sites (of which there are MANY) in this area. The plan can be changed to reflect this – yet the ‘soft’ option has been chosen in every case.

Social aspects MUST be considered. As the developers already own the land, you releasing it will ensure they get their diggers in as quickly as possible, however you have failed to put the infrastructure in place to support this. There are inadequate facilities in respect of schools, roads and healthcare, an up-to-date survey MUST be completed in respect of traffic, CCG (GP) waiting lists and access to schools, particularly secondary. The old surveys quoted in the plan are now more than obsolete and must be repeated.

There must be more employment opportunities to ensure that Knowsley does not become even more deprived with even higher levels of poverty, releasing greenbelt will not aid in this.

The consultation has been woeful – your own staff in ‘One-Stop’ shops were unaware that they had the information to provide to people, so how could the public be informed? A proper consultation of the people of Whiston MUST be undertaken, the links on the website must be available at all times (your link was down for the first 3 weeks of the consultation process) to allow residents their say, which is why local residents had to take their own time and money to print hard copies of the forms for their neighbours.

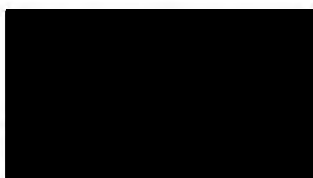
5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

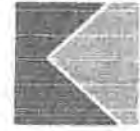
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Signature



Date

12/11/14



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council

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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	SCOTT CUNNINGHAM	
Job Title (if appropriate)	<del>SCOTT CUNNINGHAM</del>	
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

KGB14

Policy Ref

EC1

Paragraph Ref

**2. Do you consider that the proposed modification is...? (please tick relevant box)**

Yes

No

a) Legally Compliant? (see guidance note 2.2)

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 re convening 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

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Signature

[Redacted Signature]

Date 1.11.14

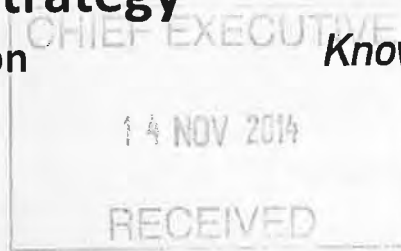
# Knowsley Local Plan: Core Strategy

## 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	
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 green belt.

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.

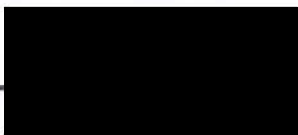
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Signature



Date

12/11/14



# 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		
Name	Andrew Thorley	Siân Butt
Job Title (if appropriate)		Assistant Planner
Organisation (if appropriate)	Taylor Wimpey UK Ltd	Pegasus Group
Postal Address		██████████ ████████████████████ ██████████
Postcode		██████████
Telephone Number		██████████████████
Email Address		██████████████████████████████
Preferred Method of Contact		Email

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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## **PART B – YOUR REPRESENTATIONS**

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Taylor Wimpey UK Ltd

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

Policy Ref

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                       |
|---|--------------------------|--------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

Please see comments within enclosed letter.

Thank you

*Continue on a separate sheet if necessary...*



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

*Continue on a separate sheet if necessary...*

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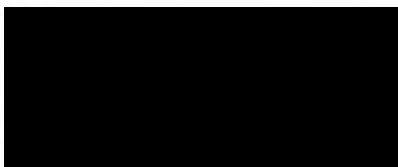
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Signature:



Date

13-11-14

13<sup>th</sup> November 2014

Local Plan Team  
Knowsley Council  
1<sup>st</sup> Floor Annexe  
Municipal Buildings  
Archway Road  
Liverpool  
L36 9YU

Dear Sir or Madam

## **Representations to Knowsley Local Plan: Core Strategy Schedule of Proposed Modifications to the Submission Document**



Further to the publication of Schedule of Proposed Modifications to the Core Strategy (as **approved at the Council's Cabinet on 10<sup>th</sup> September 2014**), we set out comments made on behalf of our client Taylor Wimpey UK Limited (TW) principally in relation to their land interest at Edenhurst Avenue, Huyton. This letter will only comment on the most recent changes within the above document dated September 2014 but will draw on the Inspectors findings reported during the examination process.

In summary, Taylor Wimpey **support the Council's proposed modifications** with specific regards to the release of Green Belt sites through the Core Strategy and in particular the proposed allocation of the Edenhurst Avenue site as a Sustainable Urban Extension for residential development. This modification is one Taylor Wimpey has sought throughout the Core Strategy process.

**A number of the proposed modifications seek to address the Council's** lack of 5 year land supply and address the issues raised by the Inspector in his Interim Findings dated 24<sup>th</sup> January (EX26). This **letter provides further detail on TW's support for the proposed modifications** relating to Green Belt release, Housing Delivery and the inclusion of Sustainable Urban Extensions within the Core Strategy.

### **Green Belt Release**

TW support the modification at paragraph 1.3 which confirms that Core Strategy will include the allocation of areas to be removed from the Green Belt to be referred to as '**Sustainable Urban Extensions**' (SUE). TW also support the additional wording at paragraph 1.10 which confirms the Site Allocations and Development Policies (SADP) document will identify further sites for housing, employment and other development and will supplement the allocations for the SUEs set out within the Core Strategy; it is important to clarify that those sites allocated within the SADP should not be a substitute for the sites allocated as SUEs within the Core Strategy. This approach **is in line with the Inspector's comments detailed at paragraph 12 of the Inspector's Interim Findings** (EX26) which confirms that Option 2 as stated within document AD37 may be the most

  
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expedient in terms of controlling the release of Green Belt land and minimising the delay in achieving adoption of the Core Strategy.

In accordance with the above modifications, the Council have included map extracts within the Proposed Modifications to the Policies Map document (CS10). TW support the modifications made and in particular support the addition of Map Extract 4 and the identification of the Edenhurst Avenue site for an SUE for residential removal including its removal from the Green Belt.

With regards to the Spatial Strategy for Knowsley (Policy CS1) and the Green Belt (Policy CS5), TW support the amendment to clause 'e' in Policy CS1 and the release of the SUE sites from the Green Belt at adoption in order to meet housing need and ensure an adequate supply of housing land and the amendment of clause 4 within Policy CS5 which confirms that a number of locations will be removed from the Green Belt to accommodate development needs. We also support the amendment made at paragraph 6.8 which reaffirms that the SUEs will be required to meet immediate development needs and as well as long term needs.

### **Housing Delivery**

**With regards to the Council's 5 year land supply, we note that within the Inspector's Second Interim Findings (EX34), he has considered the Council's schedule of further modifications (CS08b) and the Council's revised approach to the calculation of a 5 year housing land supply and confirms he now finds this sound. The inclusion and allocation of the SUEs was justified through the examination process as it was confirmed that the Council were unable to demonstrate a 5 year land supply of deliverable housing sites as there were serious viability constraints with a number of the sites within the existing urban area.**

We note and support the amendment made to paragraph 5.6 which states that the sites which have been removed from the Green Belt will help to ensure an adequate supply of land for housing and employment development. We also note the addition made to paragraph 5.23 which confirms the Council will review Policy CS3 (Housing Supply, Delivery and Distribution) when appropriate if there is an under-delivery of housing against the plan period target.

Policy CS3 provides further detail on the supply and phasing of land for new housing development, clause 3 confirms that land will be identified to ensure a five year supply of deliverable sites is maintained at all times and land within the SUEs will be released to subject to the requirements of Policies CS5 and SUE1 to SUE2c.

With regards to affordable housing, Policy CS15 (Delivering Affordable Housing) TW support the amendment made to clause 1 which reduces the provision of affordable housing sought within the urban area to 10%. It is accepted that there is generally a higher level of development viability in the proposed SUEs and therefore a higher rate of 25% affordable housing is generally acceptable within the SUEs. Taylor Wimpey also support recognition that viability will also be a key consideration for any individual case as set out at paragraph 7.6. We note the recommended tenure split stated in paragraph 7.8 however, TW consider that the existing housing mix in the area should be considered when assessing the amount and tenure of affordable housing in order to assist in creating mixed communities. A number of the proposed SUEs are adjacent to areas dominated by social rented properties and therefore in some instances it may be preferential for a development to provide a higher level of private, low cost for sale units to balance the housing

market. We note the Council's commitment to rebalancing the housing market is endorsed at paragraph 7.9.

### **Inclusion of Sustainable Urban Extensions**

Taylor Wimpey support the addition of Chapter 6A regarding SUEs and safeguarded land, in particular the inclusion of Edenhurst Avenue as an SUE within Policy SUE1. It is noted within the **Inspector's second interim findings (EX34) that the Council's identification of SUEs and the removal of the phasing mechanism as stated within the Submission Document Incorporating Proposed Modifications (CS09) is now sound.** It is noted and supported at paragraph 6A.16 that the SUEs will be released from the Green Belt and allocated on adoption of the Plan.

The 86 dwellings suggested by the Council on the allocation profiles within Appendix E is based on development just within Flood Zone 1. It should be noted that as part of any planning application a full Flood Risk Assessment would be carried out and therefore it may be possible that the site would be able to accommodate a greater number of dwellings than the figure proposed by the Council. We support the lack of a cap on the development capacity of the sites, indeed initial assessments carried out by TW indicate the developable area can be increased after mitigating flood risk which can be assessed at the application stage.

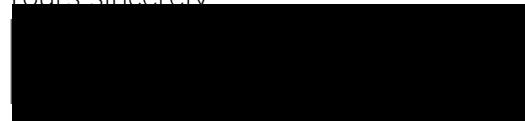
### **Conclusions**

**This letter has reaffirmed Taylor Wimpey's support for the identification of Edenhurst Avenue as a Sustainable Urban Extension.** We note the Inspector has considered a number of the proposed modifications and finds a number of the above sound (EX34). TW share **the Inspector's view on the Council's amendments** relating to the context of this letter.

We trust these representations are clear and outline our support for the Proposed Modifications to the Core Strategy and the examination process as a whole.

Should you have any questions regarding the above, please do not hesitate to contact me.

Yours sincerely,



Sebastian Tibenham

**Planning Director**



# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form



Knowsley Council



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**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Suzanne Lewis	
Job Title (if appropriate)	Receptionist	
Organisation (if appropriate)		
Postal Address	[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 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 correlation 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 competitiveness 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...

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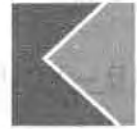
Signature



Date

1<sup>st</sup> / 11 / 14

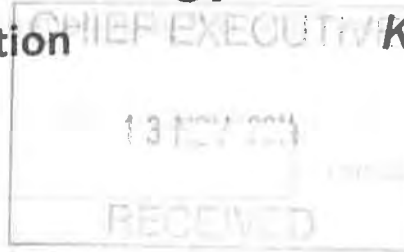




# Knowsley Local Plan: Core Strategy

## Proposed Modifications - Consultation Representations Form

Knowsley Council



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#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title <del>MR</del> <del>MR</del>	MR	
Name	TE OGWONNA	
Job Title (if appropriate)	Self Employed.	
Organisation (if appropriate)	None	
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

### 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.

It would seriously damage the character of Whiston and will overload the infrastructure.  
we have to think of future generations, the loss of arable green land, 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 Surgerys  
There is at present very little parking spaces. The noise now from traffic is unaceptable & air pollution  
It is now almost impossible to cross Windy Hill 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...*

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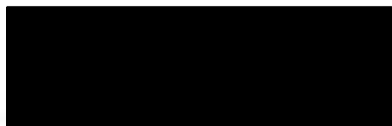
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Signature



Date

12/11/2014

[REDACTED]

---

**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 Reps 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](http://www.atdspecialties.co.uk)

# 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	TONY DOCHERTY	
Job Title (if appropriate)	LANDOWNER	
Organisation (if appropriate)	n/a	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

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	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

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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

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. Weston 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.

[REDACTED]

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**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, Prescott, Huyton, Kirkby, Halewood and Knowsley Village for potential development - including housing.

Whilst I appreciate the need to house the already over-populated areas of Prescott 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 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 Prescott, 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

#### RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

#### PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

#### PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Vitti Osborne	
Job Title (if appropriate)	Parish Clerk	
Organisation (if appropriate)	Cronton Parish Council	
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	[REDACTED]	

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

**PLEASE NOTE:** Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

## **PART B – YOUR REPRESENTATIONS**

**(Please use duplicates of Part B if your comments relate to more than one modification)**

Name and/or Organisation

Cronton Parish Council

### **1. To which proposed modification to the Core Strategy does this representation relate?**

Modification Ref

M078, M168  
and M272

Policy Ref

CS5 ,SUE1, SUE2,  
SUE2c

Paragraph Ref

### **2. Do you consider that the proposed modification is...? (please tick relevant box)**

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.**

The proposed modification is not sound and inconsistent with the NPPF Green Belt Policy.

The Parish Council **objects** to the removal of the sites (South of Whiston and Land South of M62) from Green Belt to Sustainable Urban Extension.

It is the Parish Council's policy to safeguard green belt. The National Planning Policy Framework states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that a key attribute of land in the Green Belt is its openness. The removal of the sites from Green Belt is totally against the Green Belt policy and its purposes.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

To protect the countryside, brownfield land in the Borough should be used for the proposed developments.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 6 November 2014

RESPONSE DICTATED  
 TO G. WILDGOOSE  
 IN OSS RECEPTION  
 ON 13/11/14 DUE  
 TO INABILITY TO  
 COMPLETE FORM AS A  
 RESULT OF VISUAL  
 IMPAIRMENT

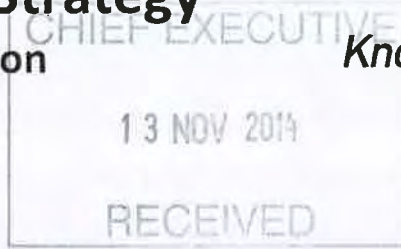
[REDACTED] 13/11/14

**Core Strategy**

consultation



Knowsley Council



Knowsley Council by **12 noon on Friday 14 November**  
an not be accepted.

- > By email: [LocalPlan@knowsley.gov.uk](mailto:LocalPlan@knowsley.gov.uk)
- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

**PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**

**PART A – PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MRS	
Name	YVONNE OWENS	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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[REDACTED]

## PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

### 1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M168

Policy Ref

SOUTH  
WHISTON  
& LAND SOUTH OF M62

Paragraph Ref

### 2. Do you consider that the proposed modification is...? (please tick relevant box)

- |   | Yes                      | No                                  |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3)             | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

- Concerned about traffic on Lickers Lane, Foxs Bank Lane, Windy Arbor Road arising from development.
  - Need to protect woods on Lickers Lane.
  - No pavements on Foxs Bank Lane and Cumber Lane is poor.
  - Traffic is getting worse, impact from developments
  - Concerned about principle of Green Belt release
  - Need to look at empty houses and brownfield land first + empty other properties (retail, etc)
  - Concerned about affordability for first time buyers  
→ houses at Cables in Prescott not selling
  - Lack of need for additional employment given vacant premises elsewhere in Knowsley, including Prescott
- Continue on a separate sheet if necessary...
- Poor public transport links - particularly buses & trains to Prescott town centre
  - limited capacity of hospital & health clinic & schools



4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- Not releasing Green Belt - should be looking at empty properties, empty premises and brownfield land first.
- Green Belt retained to promote healthy activities such as parks.
- Recommend Country Park promotes employment and follows the example of the Wildflower Centre.

*Continue on a separate sheet if necessary...*

**PLEASE NOTE** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

**PLEASE NOTE** - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

[Redacted Signature]

Date

13/11/14