



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications Consultation

Report of Representations - Volume 8

December 2014

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26 KNOWSLEY VILLAGE

Representations relating to Proposed Safeguarded Land "Land at Knowsley Village"

Reference	Copies Submitted	Submitted by:	
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KNOWSLEY VILLAGE 001	1	126	Ada Whitby
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KNOWSLEY VILLAGE 003	1	130	Alan Vearncombe (2)
KNOWSLEY VILLAGE 004	1	143	Ann Robertson
KNOWSLEY VILLAGE 005	1	150	B Kirkwood (1)
KNOWSLEY VILLAGE 006	3	150	B Kirkwood (2)
		326	John Holmes (2)
		398	Margaret Holmes (2)
KNOWSLEY VILLAGE 007	3	150	B Kirkwood (3)
		326	John Holmes (1)
		398	Margaret Holmes (1)
KNOWSLEY VILLAGE 008	1	157	Barry Lucas
KNOWSLEY VILLAGE 009	1	168	Butchard
KNOWSLEY VILLAGE 010	1	189	Colin Smith
KNOWSLEY VILLAGE 011	1	191	Collette Milne
KNOWSLEY VILLAGE 012	1	197	Daniel Smith
KNOWSLEY VILLAGE 013	1	202	David Blinkow
KNOWSLEY VILLAGE 014	1	208	David Vearncombe
KNOWSLEY VILLAGE 015	1	209	Dawn Andrews
KNOWSLEY VILLAGE 016	1	251	George Howarth MP
KNOWSLEY VILLAGE 017	1	254	Gerard Dolan
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KNOWSLEY VILLAGE 019	1	262	H Andrews

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KNOWSLEY VILLAGE 021	1	266	Heather Weightman, Knowsley TC
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KNOWSLEY VILLAGE 023	2	277	Ian Mckenzie
		278	Ian Porter
KNOWSLEY VILLAGE 024	1	281	J A Barton
KNOWSLEY VILLAGE 025	1	282	J A Ireland
KNOWSLEY VILLAGE 026	1	283	J Cassels
KNOWSLEY VILLAGE 027	1	285	J P Cairns
KNOWSLEY VILLAGE 028	1	289	Jacqueline Jones
KNOWSLEY VILLAGE 029	1	298	Janet Marriott
KNOWSLEY VILLAGE 030	1	301	Jaqueline Robinson
KNOWSLEY VILLAGE 031	1	316	Jenny Jones
KNOWSLEY VILLAGE 032	1	318	Joan Groves
KNOWSLEY VILLAGE 033	1	320	Joan Medder
KNOWSLEY VILLAGE 034	1	342	Julie Ranson
KNOWSLEY VILLAGE 035	1	347	Karen Hickey
KNOWSLEY VILLAGE 036	1	350	Kathy Ireland
KNOWSLEY VILLAGE 037	1	356	Keith Paterson
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			A Davies
			A Kirby
			A Merrills
			A Neale
			A Neale
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			Andrew Davies
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			Anthony Brady
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			Anthony Hughes
			Anthony Lacey
			Anthony Reeve
			Antony McGee
			Antony Spring
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			Audrey Currie
			Audrey Travis
			Austin Tinsley
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			Avril Bevan
			Avril McCulley
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			B Hamilton
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			B Hughes
			B Ianson
			B M Reeve
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			Barbara Pinnington
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Betty Wilson			

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			C Daly
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Christina Tully			
Christine Burns			

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			Colette Wilkins
			Collette Milne
			Connor Fitzmaurice
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			D Dutton
			D Dyer
			D Hales
			D Keown
			D Kirby
			D McGowan
			Dale Wardle
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			David Crookham
			David Dring
			David Egan
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			David Mansfield
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			Deborah Stewart
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			E A Neely
			E Cassidy
			E Holbrook
			E J Mackey
			E McCormack
			E Stewart
			E Walsh
			Edna Thomson
			Edward Heywood
			Eileen Hayden
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			Elaine Burke
			Elaine Wardle
			Elizabeth Albertina
			Elizabeth Baxter
			Elizabeth Crookham
			Elizabeth Hart
			Elizabeth Jones
			Elizabeth Melsom
			Elizabeth Tennant
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			Frances Simon
			Francine Beard
			Francis Arroyo
			Francis Grainger
			Frank Currie
			Frank Evans
			Frank Rennison
			G A Harr
			G Allan
			G Carroll
			G I Crawford
			G J Walsh
			G Millie
			G O'Hara
			G Staunton
			Gary Birchall
			Gary Kirk
			Gary Lyon
			Gary McCulley
			Gary Smith
			Gemma Rothwell
			George & Julia McDonald
			George Brooks
			George Tilley
			Georgina Gilgeous
			Georgina Hughes
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			Glen Story
			Gopal Chaudhury
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Graham Hoggarth			
Graham Jones			
Greg McCoag			
Gregory Lacey			

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			Henry Murray
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			Hilary Hadfield
			Hilda Fleming
			Holly Ianson
			Hugh Lea-Wilson
			I Walsh
			Ian Blackburn
			Ian Cockburn
			Ian McKenzie
			Ian Porter
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			Ivy Marsh
			J Barnes
			J Brady
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			J Durie
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			J M Crawford
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			J Smith
			J Walsh
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James Doyle			
James Higgins			
James McCulley			
James McVeigh			

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			Jason Wilde
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			Jean Barker
			Jean Flynn
			Jean Grimes
			Jean Keen
			Jean Ryan
			Jean Walton
			Jeanette Crookham
			Jeanette O'Brien
			Jeanette Rafferty
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			Jeffrey Parker
			Jennifer Dune
			Jennifer Garrett
			Jennifer McVeigh
			Jennifer Wick
			Jessica Brady
			Jessica Gibson
			Jessica Holland
			Jessica Ianson
			Jessica Lunt
			Jessica Rae Murphy
			Jill Davies
			Jill Reid
			Jillian Doyle
Jitkanya Burns			
JJ Williams			
Joan Bond			
Joan Dolan			
Joan Hogg			

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			John Bilsborough
			John Cahill
			John Crist
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			John Dickinson
			John Dougherty
			John Egan
			John Evans
			John Gibson
			John Gilhooley
			John Holmes
			John Hopwood
			John J Dillon
			John McKenzie
			John Murphy
			John Newton
			John Parr
			John Patrick Kilgannon
			John Penrose
			John Reddington
			John Reeve
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			John Ross
			John Sabatina
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			John Tinsselle
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John-Paul Kerfoot			
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			Joseph Mangan
			Joseph Reeve
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			Joseph Seary
			Joseph Shenton
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			Joseph W Butterworth
			Joshua Beattie
			Joshua Fitzmaurice
			Joshua Smith
			Joshua Tremarco
			Joyce Brown
			Joyce Camber
			Joyce Davies
			Judith Kangas
			Judith Mitchell
			Judy McCoag
			Julie Bain
			Julie Banks
			Julie Cowley
			Julie Currie
			Julie Penrose
			Julie Ranson
			K Addy
			K Jones
			K Kolokotrone
			K Lewis
			K Lewis (2)
			K Lunt
			K McAdam
			K Merrills
			K O'Hara
			K Robinson
			K Rocklitt
			Karen Coltman
			Karen Evans
			Karen Hemalt
			Karen Murphy
			Karen Owens
Karen Reeve			
Karl Hoggarth			
Katharine Lowe-Paton			
Kathy McKenna			
Katie Brady			

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			Keith Tennant
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			Kenneth Hewitt
			Kerry Hills
			Kevin Dawson
			Kevin J Monaghan
			Kevin Saunders
			Kevin Walton
			Kim Lawson
			Kulbhushan Sabharwal
			Kylie Banks
			L Addy
			L Barlow
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			Laura Rafferty
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			Laura Tremarco
			Lauren Dougherty
			Laurence Saunders
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			Lee Bassnett
			Lee Mansfield
			Lee Murphy
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			Lee Wong
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Letitia Reeve			
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Li Ming Wing			
Liam Murphy			
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			Louis Anastasiou
			Lucy A Parker
			Lucy Woods
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			Lyndsey McMullin
			Lyndsey Seddon
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			Lynn Paterson
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			M Baines
			M Campbell
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			M Dyer
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			M Glachan
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			M Lundy
			M Lunt
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Malcolm Lawson			
Marcella Higgins			
Margaret Caughey			
Margaret Holmes			

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			Marie Williams
			Marilyn Beck
			Marion McCarthy
			Mark Beament
			Mark Billington
			Mark Burns
			Mark Currie
			Mark Howorth
			Mark Kemp
			Mark Lucy
			Mark Morton
			Mark Murray
			Mark Piminton
			Mark Sabatini
			Mark Thornton
			Martine Ryan
			Mary Brown
			Mary Cookson
			Mary Millican
			Mason Lockley
			Master Imman
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			Maureen Reynolds
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			Michael Banks
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Michael McKenna			
Michael Paget			
Michael Parsons			

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			Miss O'Neill
			Miss Tyrrell
			MJ Sheppard
			Mohamed A Sadiq
			Monica Weld-Richards
			Morag Picton
			Mr Ackroyd
			Mr and Mrs Anthrobus
			Mr and Mrs Arslanian
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			Mr and Mrs Tailer
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			Mr Brian
			Mr Byrne
			Mr C Hales
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			Mr Davies
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			Mrs May
			Mrs Patricia
			Mrs Patterson
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			Neil McGregor
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			P Mornelli
			P Smith
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Pates O'Neill			
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			Paul Beattie
			Paul Birch
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			Paul Donnelly
			Paul Durie
			Paul Fitzgerald
			Paul Higginson
			Paul Imman
			Paul Jeffrey
			Paul Johnson
			Paul Manning
			Paul McDonald
			Paul Roberts
			Paul Shaw
			Paul Taylor
			Paul Tremarco
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			Paula McComb
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			Pauline Prayle
			Pauline Reddington
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			Pekka Kangas
			Peter Brooks
			Peter Burns
			Peter Campbell
			Peter Ianson
			Peter McCabe
			Peter Moorcroft
			Peter Simon
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			Stephen Boyle
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			Stephen Mansfield
			Stephen Marsh
			Stephen Mitchell
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			Sylvia Parr
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			Thelma McCaffrey
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			Thomas Hogg
			Thomas Hughes
			Thomas LeBreton
			Thomas Lynskey
			Thomas Owens
			Thomas Thompson
			Thomas Tully
			Thomas Walton
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			Tina Rennison
			Tony Fitzmaurice
			Tony McCoag
			Tony Murphy
			Tony Shu
			Tracey Judge
			Tracey Rotheram
			Tracy Worthington
			V Barker
Valerie Campbell			
Valerie Walsh			
Vera & Dave Brown			
Verna Wozek			
Veronica Mangan			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			Vicki Bannon
			Vicky Sweeney
			Victoria Owen
			W Forehead
			W J Frost
			W Lunt
			W Walsh
			William B Hughes
			William Blackburn
			William Murphy
			William Woods
			Winifred McCabe
			Xander Blair-Porter
			Xavier Blair Porter
			Yvonne Dixon
Yvonne Smith			
Unknown (address only) x 12			
Unknown (no address) x 6			
KNOWSLEY VILLAGE 039	625	569	A Caddock
			A Carter
			A Casey
			A Cockburn
			A D Robinson
			A Dawber
			A E Whitby
			A Greig
			A Hayden
			A Jones
			A Kirby
			A Manning
			A Merrills
			A Murphy
			A Neale
			A O'Brian
			A P Milne
			A Rose
			A Spelman & Spelman
			A Tinsley
			A Woods
			Adam Wardle
			Alan Goodwin
Alan Mclver			
Allan Gunn			
Amanda Dillon			
Amanda Mackey			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			Amie Crookham
			Andrew Boothroyd
			Andrew Davies
			Angela Fitzmaurice
			Angie Thompson
			Annita Sadiq
			Anthony Ditchfield
			Anthony Reeve
			Antony McGee
			Antony Spring
			Audrey Travis
			Ava Jane Williams
			B Baines
			B Derrick
			B Hickey
			B Hickey & Hickey
			B Higginson
			B Keogan
			B M Reeve
			B Maguire
			B McCormick
			B Morris
			Barbara Dougherty
			Barbara Ianson
			Barbara McAllister
			Barry & Debbie Lucas
			Barry Hogan
			Beryl Clarke
			Bethany H
			BH Denton
			Brenda Ithell
			Brooks & Brooks
			C A Birchall
			C Baker
			C Banks
			C Bolen
			C Burns
			C Carey
			C Currie
			C Daly
C Dickinson			
C Dolan			
C E Evans			
C Feelin			
C Hanson			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			C Hitchmough
			C Jones
			C K Shu
			C McDonald
			C McKenzie
			C McKenzie
			C Murphy
			C P Brent
			C P Brent (2)
			C Parr
			C Poole
			C Sweeney
			C.S. Connell
			Carol Kirk
			Catherine Dillon
			Charlie Mackey
			Chris Woods
			Christina Tully
			Christina Tully (2)
			Christopher Tully
			CM
			Colette Grainger
			Collette Milne
			Connor Fitzmaurice
			D A Brown
			D and L Berry
			D Barnes
			D Crookham
			D Drinsi
			D Dutton
			D Egan
			D Flerwin
			D Gadd
			D Johnson
			D Jones
			D Lloyd
			D M Avann
			D M Gallagher
			D McAllister
			D McCulley
D McGowan			
D McKenzie			
D Rose			
D Stewart			
D Wardle			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			Daniel Fitzmaurice
			Danielle Willis
			David Baxter
			David Flynn
			David Stewart
			Debbie Story
			E A May
			E Cassidy
			E Crookham
			E G Milne
			E Matthew
			E Melsom
			E Stewart
			E Thomson
			E Tinsley
			Edward McCormack
			Elaine Burke
			Elaine Wardle
			Elizabeth Baxter
			Ellen Mackey
			Emma Allan
			Esther Tully
			F Baines
			F Caddock
			F Currie
			F Daly
			F Daly (2)
			F M Gallagher
			F McMahon
			Florence Edwards
			Frank Rennison
			G Birch
			G Bolligen
			G O'Hara
			G S Crawford
			G Shankey
			G Smith
			G Staunton
			G Welsh
			G W Brooks
Gary Kirk			
Gary Lyon			
Gary Smith			
George McDonald			
George Tilley			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			Glen Story
			Graham Hoggarth
			H J Brown
			H J Milne
			H Moorcroft
			H Murray
			Hannah Jones
			Hannah Jones
			Harry Ainsworth
			Helen Leigh
			Holly Ianson
			Hugh Lea-Watson
			I Jackson
			I McCormack
			I McKenzie
			I Picton & M Picton
			Ian Cockburn
			Irene Gough
			J Ackroyd
			J and L Evans
			J Arroyo
			J Barker
			J Barker
			J Barnes
			J Brady
			J Breely
			J Brown
			J Burns
			J Butterworth
			J Carpenter
			J Cassels
			J Crawford
			J Crist
			J Davies
			J Dolan
			J Durie
			J Durie (2)
			J E Glennon
			J Egan
			J Garrett
J Grimes			
J Groves			
J Higgins			
J Jones			
J Jones (2)			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			J Kennedy
			J Lunt
			J M Baker
			J Mangan
			J Mangan
			J Marsh
			J McKenzie
			J Murphy
			J Murray
			J Newton-Jones
			J O'Brian
			J Penrose
			J Pepper
			J R Murphy
			J Reeve
			J Renshall
			J Richards
			J Roberts
			J Ryan
			J Ryan (2)
			J Smith
			J Stewart
			J Swift
			J Taylor
			J Thompson
			J Walsh
			J Walton
			J Walton (2)
			J Woods
			James Doyle
			Janet Parsons
			Janette Edwards
			Jason Mackey
			Jason Wilde
			Jay Smith
			Jean Flynn
			Jeanette Crookham
			Jennifer Wick
			Jessica Ianson
			Jill Davies
Jillian Doyle			
Joan Hogg			
Joanne Howard			
Joanne Newton-Jones			
Joe Bellion			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			John Dickinson
			John Dillon
			John Dougherty
			John Kidd
			John Murphy
			John Parr
			John Paul Kerfoot
			John Ross
			John Thompson
			John White & Shirley White
			Jon Burke
			Jordan Bannon
			Josephine Brown
			Joshua Fitzmaurice
			Joshua Tremarco
			Joyce Camber
			Judith Kangas
			Julia McDonald
			Julie Cowley
			Julie Penrose
			K Addy
			K Hewitt
			K J Monaghan
			K McArdle
			K Merrills
			K Murphy
			K O'Hara
			K Robinson
			K Rockliff
			K Saunders
			Karen Evans
			Karen Jones
			Karl Hoggarth
			Kathy McKenna
			Kellie O'Hara
			Kelsey Walton
			Kevin Walton
			Kim Jeffrey & Paul Jeffrey
			L A Birch
			L Addy
L Barlow			
L Bottom			
L J Parsons			
L J Rose			
L Jones			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			L Kelly
			L M Riley
			L M Smethurst
			L McIlreay
			L Murphy
			L Paterson
			L Reeve
			L Robinson
			L Saunders
			L Taylor
			Laura Tremarco
			Lauren Dougherty
			Leanne Ianson
			Lee Bassnett
			Lee Walton
			Liam Murphy
			Linda Whiley
			Loucas Anastasiou
			Louis Anastasiou
			Lucy Woods
			Lyndon James
			Lyndsey McMullin
			M Ackroyd
			M and J Kemp
			M Barnes
			M Brown
			M Campbell
			M Coulter
			M Cox
			M Crist
			M Daly
			M Durie & P Durie
			M Dyce
			M E Williams
			M Elis
			M Glachan
			M Greenhalgh
			M Grimes
			M Healy
			M Higgins
M Howard			
M J Sheppard			
M L Neale			
M LeBreton			
M Lunt			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			M M Riley
			M McDonnell
			M McDonnell (2)
			M Millican
			M Milne
			M Monaghan
			M Murphy
			M Nely
			M Parsons
			M Penn
			M Reynolds
			M Richards
			M Sadiq
			M Sweeney
			M T Caughey
			M Walberg
			M Weir
			M Wing
			Marc Robinson
			Margaret Caughey
			Maria McMullin
			Marie Tyrrell
			Marion McCarthy
			Mark Burns
			Mark Howarth
			Mason Lockley
			Maureen Roebuck
			Michael Jones
			Michael McGowan
			Michael McKenna
			Michael Paget
			Michelle Ditchfield
			Michelle Walters
			Mida Philips
			Mr & Mrs Banks
			Mr & Mrs Bates
			Mr & Mrs Carter
			Mr & Mrs Dono
			Mr & Mrs Patterson
			Mr & Mrs Warner
Mr and Mrs Deane			
Mr and Mrs S Kavanagh			
Mr Arroyo			
Mr David			
Mr Davidson			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			Mr Derrick
			Mr Edwards
			Mr Evans
			Mr Hales
			Mr John
			Mr K
			Mrs Currie
			Mrs Hayden
			Mrs Parr
			N Bowers
			N Burns
			N Hall
			Neil Fitzmaurice
			Neil McGregor
			Nichole Sandey
			Olivia Tremarco
			Owen Jervis
			P A Gunn
			P Birch
			P Burns
			P Calligan
			P Campbell
			P Davies
			P E Prayle
			P H Smethurst
			P Higginson
			P Johanson
			P Johnston
			P Kirby
			P McCabe
			P Morenall
			P Munola
			P Roberts
			P S Roberts
			P Stewart
			P Sweeney
			Pam Tinsley
			Pamela Denton
			Parsons
			Pat Ainsworth
Patricia Burns			
Patricia Patterson			
Patricia Rowley			
Patricia Thompson			
Paul Bowden			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			Paul Donnelly
			Paul Manning
			Paul Sweeney
			Paul Tremarco
			Pauline Columbine
			Pauline Moorcroft
			Pekka Kangas
			Peter Ianson
			Peter Moorcroft
			Phil Allan
			Phillip Clarke
			R Bellion
			R Carter
			R Davies
			R Dixon
			R Harrison
			R Jones
			R L Barrett
			R Lloyd
			R Newton
			R Patterson
			R Sweeney
			Rachael Davies
			Raymond T Clarke
			Richard George Robinson
			Rob Ithell
			Robert and Sarah
			Robert Davies
			Robert Edwards
			Robyn Tyrell
			Rose Moorcroft
			S Brooks
			S C Swift
			S Dawber
			S Egan
			S H Edwards
			S Kirby
			S LeBreton
			S Lloyd
			S Lunt
S M Poole			
S Marsh			
S Matthews			
S Molyneux			
S Morgan			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			S P McCormick
			S Parr
			S Penrose
			S Penrose (2)
			S Rogers
			S Shaw
			S Taylor
			S Wing
			Sandra Greenhalgh
			Sarah Bowden
			Sharon Roberts
			Shaun Davidson
			Sheila Butterworth
			Siu Wai Shu
			Skye Blair Porter
			Sonia Ross
			Sophie Whiley
			Stanley Seddon
			Stephanie Holcroft
			Stephen Evans
			Stephen Johnson
			Stephen Walters
			Steven Rennison
			Susan Evans
			Susan McGee
			Susan Murphy
			Suzanne Roebuck
			Sylvia Hoggarth
			Sylvia Ledbury
			T B Flynn
			T Kane
			T Kane (2)
			T LeBreton
			T Owen
			T Rotheram
			Tanya Ashcroft
			Teresa Tilley
			Terry Rush
			Thomas Hogg
			Thomas Tully
Thomas Walton			
Tina Rennison			
Tony Fitzmaurice			

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
(continued)			Tony McCoag
			Tony Murphy
			V & D Brown
			V Bannon
			V Campbell
			V Lunt
			V Mangan
			V Sweeney
			V Walsh
			W E Blackburn
			W Ireland
			W Lunt
			W Woods
			Wai Chung Shu
			Wayne Wardle
			William B Hughes
			William Murphy
			William Woods
			Williams
			Xander Blair-Porter
Xavier Blair-Porter			
Yvonne Dixon			
Unknown (address only) x 65			
Unknown (no address) x 18			
KNOWSLEY VILLAGE 40	1	365	L J Rose
KNOWSLEY VILLAGE 41	1	367	Laura Dono
KNOWSLEY VILLAGE 42	1	371	Lee Wilder
KNOWSLEY VILLAGE 43	1	383	Lynne and Dave Berry
KNOWSLEY VILLAGE 44	1	388	M Hall
KNOWSLEY VILLAGE 45	1	390	M Penn
KNOWSLEY VILLAGE 46	2	392	Malcolm Lawson (1)
		392	Malcolm Lawson (2)
KNOWSLEY VILLAGE 47	1	395	Marc Robinson
KNOWSLEY VILLAGE 48	1	396	Margaret Dolan
KNOWSLEY VILLAGE 49	1	400	Margaret Matthews
KNOWSLEY VILLAGE 50	1	409	Mark Lewis

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
KNOWSLEY VILLAGE 51	1	410	Mark Peter Murray
KNOWSLEY VILLAGE 52	1	72	Martin Harker, Knowsley Estate
KNOWSLEY VILLAGE 53	1	432	Mr and Mrs Phillips
KNOWSLEY VILLAGE 54	1	440	Nichola Saunders
KNOWSLEY VILLAGE 55	1	457	Patrick O'Rourke
KNOWSLEY VILLAGE 56	2	5	Paul Slater (1)
		5	Paul Slater (2)
KNOWSLEY VILLAGE 57	1	469	Paula Robinson
KNOWSLEY VILLAGE 58	1	472	Pauline Columbine
KNOWSLEY VILLAGE 59	2	477	Peter Campbell (1)
		477	Peter Campbell (2)
KNOWSLEY VILLAGE 60	1	490	Ray and Lesley Harrison
KNOWSLEY VILLAGE 61	1	492	Raymond Beard
KNOWSLEY VILLAGE 62	1	493	Raymond O'Neill
KNOWSLEY VILLAGE 63	1	494	Richard George Robinson
KNOWSLEY VILLAGE 64	1	497	Robert Jackson
KNOWSLEY VILLAGE 65	1	498	Roberts
KNOWSLEY VILLAGE 66	1	508	S Drakefield
KNOWSLEY VILLAGE 67	1	509	S Dwyer
KNOWSLEY VILLAGE 68	1	532	Steven Granite
KNOWSLEY VILLAGE 69	2	543	Suzie Campbell (1)
		543	Suzie Campbell (2)
KNOWSLEY VILLAGE 70	1	558	Valerie O'Neill
Total	1602		



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

RETURNING THIS FORM

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

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

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

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

PART A - PERSONAL DETAILS

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

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

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

PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

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

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

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

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

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

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

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

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

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

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

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

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

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

Continue on a separate sheet if necessary...

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

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

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



TOO OLD.
(91 YRS.)

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



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

Signature



Date: 12th November 2014

TEL [REDACTED]

CHIEF EXECUTIVE

14 NOV 2014

5. 11. 2014.

Dear Sir,

Greenbelt Land

Ormskirk Rd and Home Farm Lane.

I wish to complain bitterly for the taking of Greenbelt Land at the above locations.

I have been looking carefully at the "Brown Land" which is available for Knowsley Council to use, and this plus the other areas shown on your plan, would I think, provide sufficient land for your requirements.

The areas in Ormskirk Rd and Home Farm Lane are good arable land under permanent cultivation. Once this is developed it will never again return to arable land.

The Ormskirk Rd land particularly has wild life inhabitants such as Stoats, Squirrels, Pheasants, Partridge, Mallards, Kingfisher. Regular visitors are Lapwings, Heron, French Partridge, Wood Pigeon, Buzzards, Kestrel and Owls.

If you built ~~and~~ ^{on} this farm land, the village of Knowsley will not be a village any more. It will be a small town and people living there might just as well live in Liverpool City Centre.

Can you please withdraw this land from your "Greenbelt" proposals.

Yours faithfully



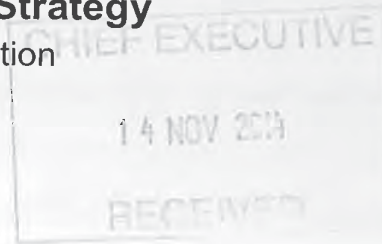
A. VEARNCOMBE.



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form



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

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

PART A - PERSONAL DETAILS

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

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MANY AREAS OF "BROWN LAND" NOT BEING CONSIDERED.

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

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

Continue on a separate sheet if necessary...

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

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

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Signature..... 

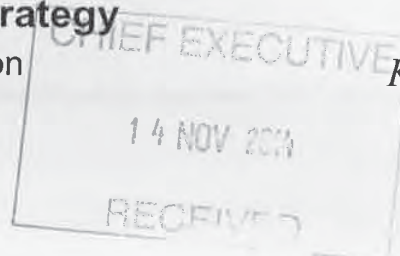
Date... 12th November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

Knowsley Council



RETURNING THIS FORM

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

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

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

PART A - PERSONAL DETAILS

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

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Signature..... 

Date 12/11.....November 2014

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

Follow Up Flag: Follow up
Flag Status: Flagged

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

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

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

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

It will damage the special landscape character of the area.

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

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

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

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

Regards

B. Kirkwood
[REDACTED]

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

Follow Up Flag: Follow up
Flag Status: Flagged

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

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

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

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

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

Furthermore, there maybe alternatives to developing this Green Belt.

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

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

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

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

Regards

B Kirkwood



From: b kirkwood [REDACTED]
Sent: 13 November 2014 21:06
To: [REDACTED]
Subject: Local Plan - Objection to Removal of Green Belt at Knowsley Village

Follow Up Flag: Follow up
Flag Status: Flagged

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

1. No Environmental Impact Assessment has been carried out to ascertain the effect of this land as well as the adjacent land.
2. No ecology Survey has been carried out to ascertain the effect of this land as well as the adjacent land.
3. The existing drainage network is insufficient and below capacity for the existing flows. Knowsley Village has been subject to areas of flooding in the past. No drainage analysis has been carried out to predict the effect of increased outflows will have on both the existing and adjacent networks.
4. No traffic Impact Assessment has been carried out. Both Knowsley Village and the surrounding area road network are already at capacity and the effect of doubling the size of the Village will be detrimental to both traffic flows and carbon emissions.
5. There has been no proposal put forward to the effect of doubling the size of the Village will have on Existing school, Doctors and Dentists..
6. The development would be in direct conflict with the national policy to protect green belt land. That policy is in place for specific purposes and the development would impact detrimentally on the openness of the green belt.
7. The plans would 'damage the special landscape, character and appearance of the area' and revealed concerns about 'highway safety' for cars, cyclists and pedestrians due to 'poor visibility'.
8. The development will mean more car journeys into the Village which is already congested and unsuitable for increased traffic.
9. The proposals will have an irreversible affect on the countryside and its surrounding area.
10. Knowsley Village is and historical village and we need to protect and preserve the character of its setting.

I can see no 'very special circumstances' that would be the only way to justify the destruction of this green belt area for the purpose of building any number of new houses.

Please forward my objections to the Inspector.

Regards

TB Kirkwood

[REDACTED]



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form



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

PART A - PERSONAL DETAILS

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

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

- a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.
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Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

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

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

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

- Value of current properties will be eroded.

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

Continue on a separate sheet if necessary...

- No residents been consulted in time to implement

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

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

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

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

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Signature.....

Date: 11/11/14 November 2014

32



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



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PART A - PERSONAL DETAILS

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

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

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

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

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

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

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

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

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

PLEASE DO NOT DESTROY OUR VILLAGE PLEASE

Continue on a separate sheet if necessary...

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Signature. 

Date 12/11/14 November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form



Knowsley Council

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

PART A - PERSONAL DETAILS

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

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KNOWSLEY LANE
IS OVER STRESSED
AT PEAK TIMES (NOW)

Continue on a separate sheet if necessary...

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Signature... ..



Date... 3, 11, 14 November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Collette Milne	
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

SUE1AppE

Paragraph Ref

2and 6A and

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

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

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October 4th 2014

Eric Pickles said:

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

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

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

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Signature



Date

14/11/14



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PART A - PERSONAL DETAILS

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

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

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

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

Continue on a separate sheet if necessary...

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Signature.....

Date.....^{12th} November 2014



Knowsley Local Plan: Core Strategy

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PART A - PERSONAL DETAILS

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

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Name and/or Organisation

DAVID BLINLOW / Save Knowsley Village Green Belt Group

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

Modification Ref

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 Paragraph Ref

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- | | Yes | No |
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4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

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

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

Continue on a separate sheet if necessary...

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

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

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Signature... 

P. D. BLINCOU

Date.....¹³.....November 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	Solicitor
Name	DAVID VEARNCOMBE	Middleton Solicitors
Job Title (if appropriate)	PAINTER	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

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

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

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

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

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

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

I agree with all the statements in this letter.

Continue on a separate sheet if necessary...

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Signature...



Date... 12th November 2014



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PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	ms.	Solicitor
Name	Dawn Andrews	Middleton Solicitors
Job Title (if appropriate)	RETIRED -	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
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(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

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

Continue on a separate sheet if necessary...

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Signature..



(KNOWSLEY VILLAGE)
(COUNCIL RESIDENT)
COUNCIL

Date...12TH...November 2014



HOUSE OF COMMONS

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

14 November 2014

To whom it may concern:

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

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

- 1 The consultation process:
Dr John Sills, in his submission to the Local Plan Team dated 9th November 2014, covered the issue of the consultation process in detail. Point 1 of his communication makes the point that both the scope and scale of the written notice of the consultation was not adequate and that the council should '...consider re-convening the consultation process to take note of the views of local residents...'
Another resident from Knowsley Lane who was legally entitled to be consulted in writing insists that she was not consulted. I have advised her to formally complain to the Ombudsman and have undertaken to take up her complaint on her behalf when she contacts me with her details. Dr Sills makes a similar complaint and I would be happy to also refer his complaint to the Ombudsman should he so wish.
- 2 Planning objections:
 - a) The character of Knowsley Lane and Knowsley Village:
Residents expressed the view, strongly held, that the proposals would, inevitably, transform the character of the area which, at present, is semi-rural and, in some parts, very rural and quite remote.
 - b) Traffic volume:
The view was expressed that the current volume of traffic, particularly that using Knowsley Lane, is already heavy. Two residents have undertaken their own traffic survey but the council should carry out an official traffic survey to assess the impact the proposal would have on the volume of traffic. This should apply to all sites under consideration.

c) The amenity of the area:

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

d) Environmental Impact:

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

e) Housing Demand:

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

f) Greenbelt Prescott:

Dr Sills points out in his letter that when the sites concerned were incorporated into the greenbelt in the early 1980s, in response to a proposal to develop an office buildings, there was an implicit assumption that it would form a buffer against continuous development. It is argued that this need is still relevant.

g) Prescott Conservation Area:

Residents felt that the proposals would undermine the conservation area and would not be in keeping with the historic nature of the town.

h) Water main:

Building over the water main from Prescott reservoir would render it difficult to gain access to repair and deal with leaks and there has been a history of such leaks.

i) Knowsley's Green Borough Policy:

Some residents asserted that the proposals were in conflict with the Council's overall claim to be a 'green borough.'

Yours sincerely,

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

Rt Hon George Howarth MP.



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PART A - PERSONAL DETAILS

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

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- | | Yes | No |
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All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Dear Sir
we do not want any more
of the Green belt taken up. you will
ruin a lovely village.

Continue on a separate sheet if necessary...

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



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

PART A - PERSONAL DETAILS

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

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

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

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

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

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

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

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

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

Would like Knowsley Village to stay a small village and not a housing estate.
Keep it in the Green Belt. We don't want to lose conservation + wild life.

Continue on a separate sheet if necessary...

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Signature...  ...

Date... 12th November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

Knowsley Council



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PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	ANDREWS	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
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THIS AREA WOULD NOT BE A VILLAGE
IF THIS GOES THROUGH
BUT SAYING THAT WE MIGHT GET A
BETTER BUS SERVICE, AND OTHER THINGS
THIS VILLAGE MISSES OUT ON, LIKE
ROADS & PAVEMENTS GETTING RESURFACED.

Continue on a separate sheet if necessary...

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

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

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Signature 

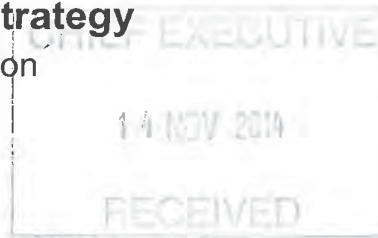
Date 13 - November 2014



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form



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PART A - PERSONAL DETAILS

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

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

Governing Councils are given legal parameters as to what proposals/actions/policies they are able to suggest/consult with people living within the borough they cover. The notice given by Knowsley Council with the restrictive time parameters does not intend to give the people of Knowsley Village sufficient time to express their concerns/have consultations or even offer alternative solutions. Do we not live in a democracy. Knowsley Village by nature of the name is a village and does not wish to be another housing estate. Residential developments are available throughout the Merseyside area. The green belt around Knowsley Village is used by dog walkers, horse riders, walkers elderly and young.

The impact of your proposals would be negative on residents.

Continue on a separate sheet if necessary...

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Signature

[Redacted Signature]

Date... 11th November 2014

KNOWSLEY TOWN COUNCIL

RESPONSE

**MODIFICATIONS TO LOCAL PLAN
RELEASE OF GREEN BELT LAND**

Knowsley Metropolitan Borough Council's proposed modifications to the Local Plan regarding the early release of green belt land within the borough of Knowsley was considered by Knowsley Town Council on 27 October 2014.

Following consideration, Knowsley Town Council **UNANIMOUSLY RESOLVED** that it is totally opposed to the early release of green belt land for the following reasons:

- It would have a detrimental effect on the social infrastructure, especially in Knowsley Village. Any future development would have a negative impact on transport and public amenities.
- Knowsley Town Council believes there are sufficient brownfield sites within Knowsley to accommodate future development.
- Knowsley Town Council is totally opposed to the reduction in affordable housing target from 25% to 10%.
- Part of the parcel of green belt land in Knowsley Village, identified for release within the plan contains an area of designated public open space, leased by Knowsley Town Council, therefore this area cannot be used for future development.
- Knowsley Town Council believes that the proposed modifications of the Local Plan may compromise Knowsley Metropolitan Borough Council's flood risk assessment.
- Knowsley Town Council believes that the early release of green belt land for development contained with Knowsley Metropolitan Borough Council's Local Plan contravenes the National Planning Policy Framework on protecting green belt land, as follows:

Paragraph 83: Local authorities with green belts in their area should establish green belt boundaries in their Local Plans. Once established, green belt boundaries should only be altered in exceptional circumstances having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Knowsley Town Council feels that the reason for the early release of green belt land in Knowsley is not an exceptional circumstance.

Paragraph 89: Local planning authorities should regard the construction of new buildings as inappropriate in green belt boundaries. Knowsley Town Council feels that any future development, especially in Knowsley Village, would be inappropriate as it would impact on the historic character and outstanding natural beauty of the area.



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PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	<i>mrs</i>	Solicitor
Name	<i>J MCCORMACK</i>	Middleton Solicitors
Job Title (if appropriate)	<i>Retired</i>	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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- | | Yes | No |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

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

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

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

Our Village is a lovely place to live, and will be spoiled, lots of Greenery why would you ruin it, by building more houses, we don't need or want them its a Village, and want it to stay that way, Please leave Knowsley Village alone, you must be aware that we don't have of lots of trouble here its a quiet place and we want it to stay that way. Trust us it will never be the same

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature 

Date.....13th.....November 2014



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

RETURNING THIS FORM

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

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

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

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	Solicitor
Name	Ian	Middletons
Job Title (if appropriate)	McKenzie	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

Ian McKenzie and Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

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

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

These representations relate to policy SUE1 and the link changes in policies CS2 & CS5

The proposal to remove large parcels of land from the Green Belt to the east and south of Knowsley Village came to the attention of the community just over one month ago. On 9 October 2014 over 400 local people [along with local councillors and the local MP, Mr George Howarth] met to hear the detail of the proposed action to remove more than 58ha of Green Belt around the village. There was a feeling of outrage at the meeting that at this stage in the process such large parcels of land could be taken from the Green Belt. Moreover, the community felt marginalised in the planning process which it is understood may not involve any further hearing of the representations that will be made. If that is correct it flies in the face of the statements that the plan process should be inclusive and that the voice of the local people should be heard. We trust that Mr.Pike will understand those deep concerns. We further hope that Mr.Pike will also understand that it takes time for a community to set out its case having regard to the need to seek professional help and to get to grips with the voluminous documentation that underlines the draft Core Strategy. Accordingly, we invite Mr.Pike in the interests of fairness, to arrange a hearing of the representations against the proposal to remove around 150 acres from the Green Belt at Knowsley Village. Should Mr.Pike agree to hold a hearing we should be grateful to receive a timetable for the process including submission of evidence.

The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CS5 and SUE1 and Appendix E of

the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

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

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

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

It is unclear whether Knowsley Borough Council has considered whether there are at Green Belt sites in adjacent areas [whether in Liverpool, Sefton, Huyton or St Helens districts] that are less sensitive than the land at Knowsley Village. There is ample time to make such investigations before any possible need to release an equivalent area to that at Knowsley Village arises. Moreover, it appears that St.Helens Borough Council envisages the release of Green Belt in the mid 2020s so that their plan strategy could be coordinated with that of Knowsley Borough Council to address such need as may arise having regard to the predicted population changes by the O.N.S, the demand for both housing and employment land as well as potential additional housing land that may arise at for example the land east of Halewood or the land south of Whiston and south of the M62.

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

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

There is a further limb to the sustainability part of the argument. It is this – because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 30/ha on other sites. The result is that the proposal is land hungry [or least 17% more land hungry and perhaps substantially more] than other sites. Moreover, seeking to construct 1093 homes on the site appears ambitious, Lord Derby has questioned whether 1093 dwellings could be satisfactorily accommodated on site. If he is correct, and we think that he is then the overall density will fall below 25/ha. It is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Part of site KGBS 6 lies east of Ormskirk Road [some 21.58 ha in extent]. This land is in active agricultural youth and is rural in appearance. The eastern edge of the site is bounded by a substantial sandstone wall and a belt of trees on its other side. At the southern end of the site on the western side of Ormskirk Road is a woodland. Elsewhere on the western side of Ormskirk Road are substantive houses that look across the site. Overall there is a very clear division between Knowsley Village and the wider countryside set by Ormskirk Road. This area provides a quiet green lung [in contrast to the area west of Knowsley Village where the environment is dominated by the noise from the M57]. There is an attractive walk from the Conservation Area [in part it is on the Council's Heritage Walk] from Sugar Lane eastwards to Ormskirk Road and hence along Old Mill Lane [a cul de sac] which leads to a public footpath [which is signed] back to Ormskirk Road. Were the site to be developed this green lung would go. The community would be left with a walk through a very large suburban estate. The rurality of the area would be lost as would the impression of Lord Derby's Estate seen through the hedgerow along Ormskirk Lane. The bulk of the remainder of site KGBS 6 fronts the relatively busy Knowsley Lane [the B5202]. There is no natural screening of this part of the site from Knowsley Lane save for the hedgerow. The effect of the proposal will therefore be to bolt onto Knowsley Village a large housing estate. The interest and special qualities of the village will be further diminished and in a location where it is most frequently seen. Furthermore the development of the entirety of KGBS 6 will as the Council have recognised, have a major impact on air quality and sustainability.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is highly valued by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. The effect is that a sustainable urban extension would not be created. It is as the Council seem to appreciate very much a second choice because of the environmental sensitivity of the location and its poor access to key services [referred to by the Council as major negatives]. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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

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

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Signature

Middleton Solicitors
Middleton Solicitors (Nov 14, 2014)

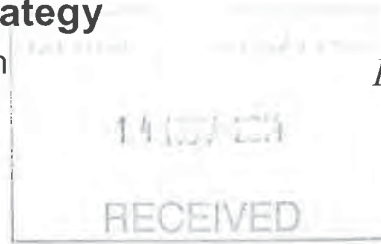
Date/4 November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

Knowsley Council



RETURNING THIS FORM

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

PART A - PERSONAL DETAILS

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

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

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

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

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

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

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

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

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

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

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

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

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

I AM OBJECTING TO THE REMOVAL OF GREEN BELT LAND INTO 'SAFEGUARDED' LAND AS I CONSIDER A MISNOMER. SAFEGUARDED LAND IS ALMOST IMMEDIATELY AVAILABLE TO PLANNERS. THIS AREA HAS COLONIES OF BATS - PROTECTED SPECIES, MOLES SHREWS HEDGEHOGS AND OWLS - ENDANGERED SPECIES PLUS FOXES RABBITS. RATS AND MICE TOGETHER WITH A MYRIAD OF BIRD AND INSECT LIFE. EACH INTERDEPENDANT TO EACH OTHER CREATING A BALANCED ECOLOGY. I THINK IT IS OUR DUTY TO SUSTAIN THE STATUS QUO FOR FUTURE GENERATIONS. Continue on a separate sheet if necessary...

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Signature..



Date... 11.11.2014 November 2014

CORE STRATEGY PLAN.

WHAT ARE YOUR PLANS FOR THE
COLLECTION, RELOCATION OR
CONSERVATION FOR THESE SPECIES

ALTHOUGH I AGREE PEOPLE
HAVE A RIGHT TO OWN THEIR HOMES
THE 'RIGHT TO BUY' ACT FOR COUNCIL
TENANTS DECIMATED THE SOCIAL
HOUSING SCHEMES IN THIS COUNTRY
YOU REAP WHAT YOU SOW.

IT IS IRONIC, THEREFORE, THAT
THE GOVERNMENT IS NOW PLANNING
TO TAKE GREEN BELT LAND.

UNTIL SUCH TIMES AS BROWN FIELDS
EMPTY HOUSES AND FACTORIES AND OFFICES
ARE UTILISED FOR HOUSING. !

AM STRONGLY AGAINST THIS PLAN.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

CHIEF EXECUTIVE

Knowsley Council

14 NOV 2014

RECEIVED

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PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	Solicitor
Name	J.A.IRELAND	Middleton Solicitors
Job Title (if appropriate)	RETIRED A.P.I.	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

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

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THE TWO SCHOOLS IN THE VILLAGE ARE TOO SMALL, TO ACCEPT A VAST INCREASE IN PUPILS. THE DOCTORS AS WELL HAS ONE DOCTOR, AND WE WOULD HAVE TO HAVE MORE OR WE WOULD HAVE TO WAIT WEEKS FOR A APPOINTMENT. AND NEW DEVELOPMENT WOULD TAKE AWAY THE CHARACTER OF THE AREA AND TURN IT INTO AN ESTATE AS SEEN IN THE COUNTRY. WE ALREADY HAVE ENOUGH MAIN ROAD GOING DOWN KNOWSLEY HAVE A NEW HOUSING ESTATE WOULD MAKE IT WORSE. WE NOW HAVE A 20 M.P.H. SPEED LIMIT. WOULD NEW PEOPLE IN THE AREA CARE AS MUCH AS THE ESTABLISHED RESIDENTS DO AND KEEP THE VILLAGE SAFE FOR ~~PEDESTRIANS~~ PEDESTRIANS. ALSO THE MAIN SEWER SYSTEM WERE CONNECTED TO THE NEW BUILDINGS WOULD NOT BE ABLE TO cope AND WOULD OVERFLOW.

Continue on a separate sheet if necessary...

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Signature.



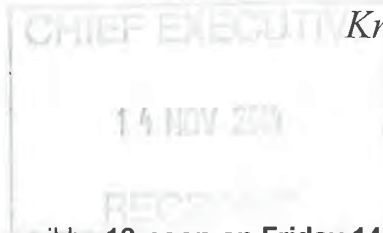
Date...11...11...November 2014

please complete will collect Wed/ Eve



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

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

PART A - PERSONAL DETAILS

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

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



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

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KNOWSLEY VILLAGE IS VER PRETTY
DONT SPOL IT

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Signature.. 

Date.....¹².....November 2014



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PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mico	Solicitor
Name	J.P. Cairns	Middleton Solicitors
Job Title (if appropriate)	Retired	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Accepted that some housing may well be necessary in the future, it would still be excessive to find over 1000 houses more, in the next ten years, unless landscaping and preservation of sizeable areas of land are guaranteed.

Continue on a separate sheet if necessary...

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Signature



Date.....13th.....November 2014



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Proposed Modifications - Consultation
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CHIEF EXECUTIVE

14 NOV 2014

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PART A - PERSONAL DETAILS

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

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Its lovely to walk down that road and see the wild birds rabbits etc.

This is a village and should be kept as a village - and I don't think that something that has been greenbelt for over 50 years can just be taken away because of greed?

Continue on a separate sheet if necessary...

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Signature. [REDACTED]

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

[REDACTED]

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

Follow Up Flag: Follow up
Flag Status: Flagged

Sent from Windows Mail

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

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

yours faithfully Janet Marriott [REDACTED]

Sent from Windows Mail



Knowsley Local Plan: Core Strategy

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CHIEF EXECUTIVE

Knowsley Council

14 NOV 2014

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PART A - PERSONAL DETAILS

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

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Modification Ref Policy Ref Paragraph Ref

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

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RUIN THE BEAUTIFUL VILLAGE & ENTIRELY BURIED THE PRESENT LAND OWNER

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

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

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

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

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

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

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

Continue on a separate sheet if necessary...

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

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Signature. [REDACTED]

Date. 11.11.14 November 2014

NOTE! MY WIFE'S WRITING IS POOR, BECAUSE OF HER SIGHT IMPAIRMENT. SHE HAS APPROX 20% OF NORMAL.



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form



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

PART A - PERSONAL DETAILS

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

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

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

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

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

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

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

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

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

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

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

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

I object to this proposal. Knowsley Village is a well sort after area for it's close community, history, location and especially for it's green spaces and woodland. For all that time here, we admire the greenland and woods available to us. As children we loved playing in the woods morning till night. I have two children, one at the age of playing at. My child loves telling me about playing in the woods with friends, having lots of space and fun! We love and have so many memories of 'The Wreck', 'Big Spook' and 'Little Spook', as many may refer to!

I live on Knowsley Lane, and at present it's a nightmare parking outside the house and entering in & out of the drive. Peak hour 5-6 pm is horrendous. Just think how Knowsley Lane will be if this proposal was to go ahead. Knowsley Lane would become a motorway right next door to the M62 as it stands. My son has to cross Knowsley Lane of a morning to catch his school bus, as it remains so busy we have to personally cross him across safely. The amount of traffic will be unbearable.

Knowsley Village was NOT aimed at housing more people than it already has, things would not be the same.

Please DONT DESTROY
OUR COMMUNITY ***

Continue on a separate sheet if necessary...

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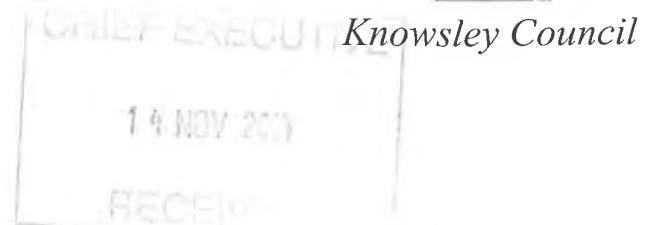
Signature

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



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PART A - PERSONAL DETAILS

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

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Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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a) Legally Compliant (see guidance note 2.2)



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

I do not agree with the removal of Knowsley Village from the Green Belt. This has always been a village & any removal would damage our status. Knowsley Village Heritage goes as far as the Poole's Day Book

Continue on a separate sheet if necessary...

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

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

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Signature 

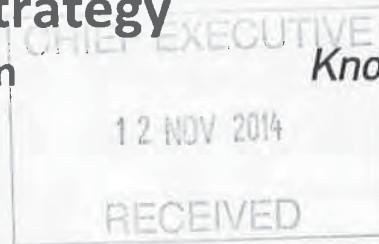
Date.....¹⁵.....November 2014



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

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

MRS JOAN MEYDER

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

Modification Ref East of Knowsley Ind & Business Parks Policy Ref North of A580 Paragraph Ref KFY

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.

My support in opposing the proposed release of Green Belt land. In and around Knowsley Village. Is to safeguard the land being safeguarded for development, within the Village. However my property is located at the edge of the Village. Within a separate site named "East of Knowsley Ind & Business Parks" and earmarked for "Employment". My objection is if this land is developed for employment I will lose my privacy, as the land is adjacent to my back garden, as well as overlooking from above. Increased noise & pollution. Increased Traffic. Where the level is high, Ducts & hot air throughout day & night. Using Knowsley lanes to get to the Business Park, adverse effect on the wild life, to numerous to mention. Which I have enjoyed for almost 38 years. Most importantly, the value of my house, also the quality of life. I moved here because we were told Green Belt land would never be built upon.

Continue on a separate sheet if necessary...

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

Building for future employment near my home is unsatisfactory, when outlets built around school have half lie empty.
The village is an historical place, and should stay like that. It will become a town, and lose its identity

Continue on a separate sheet if necessary...

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Signature



Date 10/11/14

KNOWSLEY VILLAGE 034 ID:342

From: Julie ranson waters [REDACTED]
Sent: 28 September 2014 14:46
To: Knowsley Local Plan
Subject: Knowsley Village proposed build

To All Members of The Local Plan Team, The Inspector and The Earl of Derby, Edward Stanley.

I am writing to you all to voice my objections to the proposed land development in Knowsley Village.

I have lived in Dumbreeze Grove for almost 30 years and my husband has lived here in the village for almost 50 years. Whilst there have been various factors affecting the local residents from time to time such as the development of industrial land for example, the village has remained the historic and protected community that it has always been since it was first recorded in the book of Domesday.

As you will be aware, we have several listed buildings and conservation areas within close proximity to your proposed areas of land to be released from Green Belt. Dumbreeze Grove is one of such areas. I have strict guidelines from Knowsley council about planning and conservation of trees and such in this protected area and yet less than a few meters from my boundary across a narrow road you propose to build hundreds of new homes. This is outrageous and can only damage the value of our property and overpopulate a small village. In fact we would no longer be a village but a town. The traffic in and out is currently stressed at peak times Monday to Friday and the creation of new routes in and out would only further the congestion.

Having spoken to one of your team about the land being safeguarded until 2028, it seems that this is not the case and it is sought to be released as soon as 2015. It also transpired that the land in question belongs to the Earl Of Derby. I was informed that he 'volunteered' this land to be considered for future release from green belt and ultimately he would profit from the development. It is obvious to me that he still has his conservation area within the boundary of his wall and he will not be affected in any way by the construction of the said 1093 dwellings.

I was also enlightened to the fact that many of the new homeowners would be those looking for affordable homes outside the major cities. I am worried about the possibility of large groups of newcomers being housed in one area and the effects this would have on local integration.

In conclusion, I would state that I am extremely opposed to any kind of development on the land in question and the deceptive way that this Local Plan has been instigated only raises my concerns even more.

Myself and fellow residents and neighbours are all in agreement that there is sufficient alternative land in the surrounding areas that could be developed without encroaching on such a small village.

Yours sincerely,
Julie Ranson.
Resident of Knowsley Village.
Sent from my iPad



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
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CHIEF EXECUTIVE

Knowsley Council

14 NOV 2014

RECEIVED

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PART A - PERSONAL DETAILS

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

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Paragraph Ref

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

See Comment A. We were never ever told of any changes
this must constitute an illegality somewhere in our law.

Continue on a separate sheet if necessary...

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Signature...



Date...12th...November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

Knowsley Council



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

PART A - PERSONAL DETAILS

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

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

- | | Yes | No |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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I HAVE LIVED ~~HERE~~ I WAS BORN WHICH WAS ACTUALLY IN ~~OUR BUNGALOW~~ ^{HERE SINCE} ON THE OLD ESTATE. I REMEMBER WATCHING THE VERY FIRST FAMILY BEING GIVEN THE KEY TO THEIR BRAND NEW HOUSE, IN HOME FARM ROAD. LOTS OF PEOPLE FROM THE BUNGALOWS GATHERED TO WATCH, ALL LOOKING FORWARD TO THE PROSPECT OF KNOWING THAT THEY WOULD ALL ONE DAY DO THE SAME. I CAN STILL REMEMBER HOW EXCITED MY MOTHER WAS WHEN SHE OPENED THE LETTER TELLING HER OUR NEW HOUSE WAS READY. ONCE KNOWN AS KNOWSLEY, EVENTUALLY CHANGED TO KNOWSLEY VILLAGE, I REPEAT VILLAGE. IF THIS DEVELOPMENT IS EVER BUILT IT WILL NO LONGER EXIST AS SUCH, BUT JUST BECOME ANOTHER LARGE HOUSING ESTATE. NOT TO MENTION THE YEARS OF DISRUPTION AND MESS TO RESIDENTS, AND DELAYS TO TRAFFIC ON KNOWSLEY LANE, AS THIS IS THE ONE AND ONLY WAY OF GETTING INTO THE VILLAGE. OVER THE YEARS THERE HAVE BEEN MANY PROBLEMS WITH DRAINS, THE SEWAGE SYSTEM COULD NOT COPE, CAUSING EVEN MORE FLOODS AND OUB FLOWS. THE VILLAGE WAS ONLY BUILT ORIGINALLY TO ACCOMMODATE AND SERVE 500 HUNDRED FAMILYS. I KNOW THIS AS I WAS ONLY 15 YEARS OF AGE WHEN WE MOVED. ~~PLEASE~~

Continue on a separate sheet if necessary...

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Signature... 

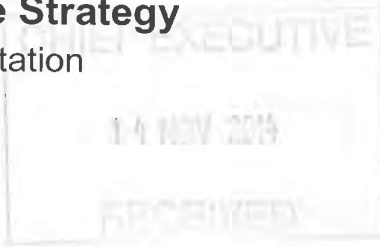
Date... 12 November 2014



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form



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PART A - PERSONAL DETAILS

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

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??

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

I STRONGLY OBJECT TO THE PROPOSED MODIFICATIONS TO THE RELEASE OF GREEN BELT, WHICH WOULD SERIOUSLY JEOPARDISE THE CHARACTER OF KNOWSLEY VILLAGE AND ITS INFRASTRUCTURE. I FULLY ENDORSE ALL THE OBJECTIONS SUBMITTED BY THE SAVE KNOWSLEY VILLAGE GREEN BELT GROUP.

Continue on a separate sheet if necessary...

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

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Signature



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

Local Plan Team, Knowsley MBC,
1st Floor Annex, Municipal Buildings,
Archway Road, Liverpool, M36 9YU.

Dated: Thursday 13th November 2014

Green Belt Modifications at Knowsley Village Reference KGBS 6

Dear Sir / Madam,

I am writing regarding the Green Belt modification at Knowsley Village reference KGBS 6 in the local plan for 2014. I believe the planned changes are irresponsible, are based on a planning horizon that is too long to avoid risk and deliver certainty, will destroy the character of Knowsley Village and compromise the Knowsley Village Conservation Area.

I challenge the modification on the following **material** grounds:

- **Existing policy:** the modification contradicts local, strategic and national planning policies;
- **Highway issues:** Knowsley Lane cannot accommodate the volume of traffic that will be generated by extended development generating adverse community and economic impact;
- **Capacity of physical infrastructure:** the introduction of over 50% more dwellings would impose disruption by demanding that existing infrastructure is renewed AND cause issues in the drainage at Knowsley Village which is already problematic;
- **Nature conservation:** there will be significant negative impacts on the Conversation Area;
- **Unacceptable pollution:** aspects of Knowsley Village are high polluted, adding c1,000 homes and cars will exacerbate this issue with the potential to cause healthcare problems.

And the following **non-material** grounds:

- **Problems arising from the construction period:** a protracted development period will subject existing residents to excessive disruption, noise, pollution, service interruption and delays;
- **Loss of view:** many residents have chosen Knowsley Village due to its scenic nature and the quality of outlook available from many properties especially those at the outskirts;
- **Loss of property value:** the economic law of supply and demand suggests that the greater availability of property will have an adverse effect on price, a period of flat house prices would enable this phenomenon to be examined and proven.

We, the residents of Knowsley Village petition the planning department of Knowsley MBC to:

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

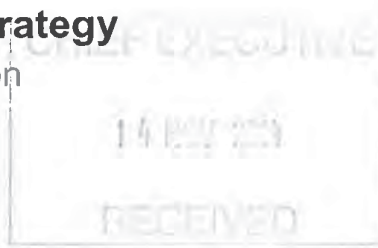
Yours Sincerely,



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

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Save Knowsley Village Green Belt Group

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Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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Yes No

a) Legally Compliant (see guidance note 2.2)



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Signature.. [REDACTED]

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

Local Plan Team, Knowsley MBC,
1st Floor Annex, Municipal Buildings,
Archway Road, Liverpool, M36 9YU.



Dated: Thursday 13th November 2014

Green Belt Modifications at Knowsley Village Reference KGBS 6

Dear Sir / Madam,

I am writing regarding the Green Belt modification at Knowsley Village reference KGBS 6 in the local plan for 2014. I believe the planned changes are irresponsible, are based on a planning horizon that is too long to avoid risk and deliver certainty, will destroy the character of Knowsley Village and compromise the Knowsley Village Conservation Area.

I challenge the modification on the following **material** grounds:

- **Existing policy:** the modification contradicts local, strategic and national planning policies;
- **Highway issues:** Knowsley Lane cannot accommodate the volume of traffic that will be generated by extended development generating adverse community and economic impact;
- **Capacity of physical infrastructure:** the introduction of over 50% more dwellings would impose disruption by demanding that existing infrastructure is renewed AND cause issues in the drainage at Knowsley Village which is already problematic;
- **Nature conservation:** there will be significant negative impacts on the Conversation Area;
- **Unacceptable pollution:** aspects of Knowsley Village are high polluted, adding c1,000 homes and cars will exacerbate this issue with the potential to cause healthcare problems.

And the following **non-material** grounds:

- **Problems arising from the construction period:** a protracted development period will subject existing residents to excessive disruption, noise, pollution, service interruption and delays;
- **Loss of view:** many residents have chosen Knowsley Village due to its scenic nature and the quality of outlook available from many properties especially those at the outskirts;
- **Loss of property value:** the economic law of supply and demand suggests that the greater availability of property will have an adverse effect on price, a period of flat house prices would enable this phenomenon to be examined and proven.

We, the residents of Knowsley Village petition the planning department of Knowsley MBC to:

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

Yours Sincerely,





Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

Knowsley Council

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

PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	Solicitor
Name	L.J ROSE	Middleton Solicitors
Job Title (if appropriate)	Retired	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

KNOWSLEY VILLAGE IS A VILLAGE
1000 Houses will destroy it as a village
which is unfair to the people who
bought houses here because it is
a village

Continue on a separate sheet if necessary...

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Signature.....



Date.....November 2014

13/11/14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
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Knowsley Council

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PART A - PERSONAL DETAILS

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

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

- | | Yes | No |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Please consider the impact of your proposals on Knowsley Village residents. There are hundreds if not thousands of existing properties which are empty and have fell into disrepair. Should we not be looking to develop existing houses rather than line the pockets off land owners and housing developers. We have lived here for 19 yrs and see our house as many other people do as an investment. This proposal will dramatically effect their value, so once again the rich get richer and the poorer get poorer. When exactly do we get ample time to voice our opinions. A Development has just finished two mile away

Continue on a separate sheet if necessary...

fill them first and dont be worrying about the next 14 yrs.

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Signature... 

Date... 11th November 2014



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	<i>MR</i>	Solicitor
Name	<i>LEE</i>	Middleton Solicitors
Job Title (if appropriate)	<i>Welder</i>	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

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

*Leave Knowsley village
as it is*

Continue on a separate sheet if necessary...

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Signature



Date *12*.....November 2014



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 + MR	Solicitor
Name	LYNNE / DAVE	Middleton Solicitors
Job Title (if appropriate)	RETIRED.	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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(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

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- | | Yes | No |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

IF YOU LOOK OUTSIDE KNOWSLEY VILLAGE
THERE ARE NUMEROUS UNDEVELOPED
AREAS. SURELY, KNOWSLEY "VILLAGE"
DOES NOT NEED TO HAVE MORE
HEAVY TRAFFIC ON KNOWSLEY LANE.

Continue on a separate sheet if necessary...

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

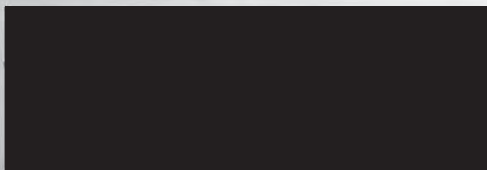
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Signature



Date: 12th November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

CHIEF EXECUTIVE
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	Solicitor
Name	HALL	Middleton Solicitors
Job Title (if appropriate)	Retired	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

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Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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I object to any hand to Knowsley Village
This is a Village i would like it
to stay that way. This Village goes
back to the Domesday Book
If this plan goes ahead it will not be
a Village any more, it will be an
Estate i have lived here 55 years
Please. Dont change it

Continue on a separate sheet if necessary...

Mary Hall

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Signature. 

Date 10.11. November 2014

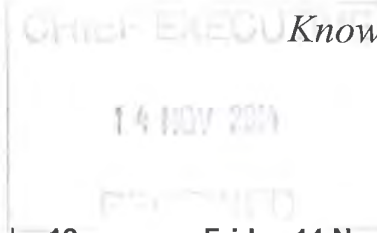
Please Complete/Will Collect Wed/ Eve

KNOWSLEY VILLAGE 045 ID:390



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form



Knowsley Council

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PART A - PERSONAL DETAILS

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

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Paragraph Ref

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Yes No

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

Why build on green Belt when there is plenty of brown fields available, traffic is bad enough now without building another 100 + odd houses, not to mention the effect on the wild life

Continue on a separate sheet if necessary...

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Signature.. 

Date... 11th November 2014



Malcolm Lawson



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

Reference: -Removal from Protected Green Belt of the current farmland surrounding Knowsley Village.

Local Plan Team,
I refer to the current proposal from Knowsley Council to remove from Protective Green belt farmland surrounding Knowsley Village in order to build circa 1,093 houses on 58.29 hectares or 174.87 acres the land.

The main reason why I, and many of my neighbours bought our homes and live in Knowsley Village was the surrounding farmland and the natural beauty of the open spaces.

I constantly hear how wildlife in the UK is declining and that many species are under threat of becoming extinct, the removal from Protective Green Belt and the subsequent building of 1,093 more homes with the huge population increase will only exacerbate this wildlife decline, therefore your proposal is a blatant act of wildlife vandalism.

I can not believe that there are NO other alternative brownfield sites with-in the Borough of Knowsley, is that what Knowsley Council are saying? that there are No other brownfield sites in the whole of Knowsley Borough that they can build on? Can you confirm?

This proposal will destroy the Knowsley Village Community as we know it, and it will destroy the habitat of many current wildlife species, therefore I must declare my strongest objection to your proposals.

Yours sincerely



Malcolm Lawson
Knowsley Village Resident

Knowsley Local Plan: Core StrategyProposed Modifications - Consultation
Representations Form

Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**PART A - PERSONAL DETAILS**

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

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Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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Signature...



Date. 11.11.14 November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
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PART A - PERSONAL DETAILS

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

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

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

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

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

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

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

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

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

Dear Sir
I do not want any houses to be built on the land Knowsley Village. Do not need any more houses. it will bring to much traffic to this lovely village

Continue on a separate sheet if necessary...

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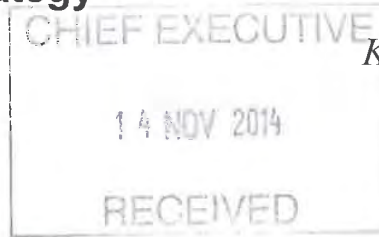
Signature.. [redacted]

Date..12.....November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form



Knowsley Council

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

PART A - PERSONAL DETAILS

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

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

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Name and/or Organisation

Save Knowsley Village Green Belt Group

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

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Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

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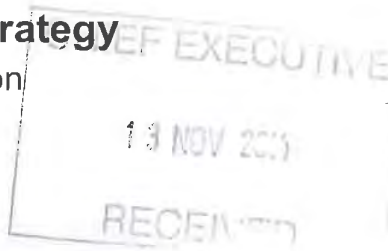
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PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title		Solicitor
Name	Mark Lewis	Middleton Solicitors
Job Title (if appropriate)	Landscape Gardener	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

I object to everything that has been proposed about development around Knowsley Village. As I live along Knowsley Lane, to double the traffic along the lane would be horrendous. Already it's like a motorway with constant traffic from 6 a.m. - 10 p.m. and on top of that the motorway behind is just constant noise everyday.

To lose the greenbelt would destroy the character and wildlife that lives there. If you took away the greenbelt there would be nothing left around the village and that little bit of quality of life when going for a walk would be lost forever.

Continue on a separate sheet if necessary...

DON'T WRECK OUR VILLAGE.

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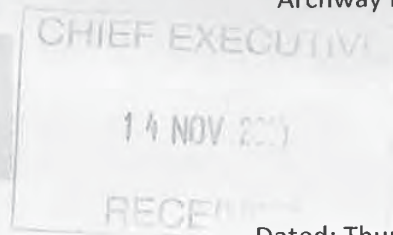
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Signature.. 

Date 10th November 2014

Local Plan Team, Knowsley MBC,
1st Floor Annex, Municipal Buildings,
Archway Road, Liverpool, M36 9YU.



Dated: Thursday 13th November 2014

Green Belt Modifications at Knowsley Village Reference KGBS 6

Dear Sir / Madam,

I am writing regarding the Green Belt modification at Knowsley Village reference KGBS 6 in the local plan for 2014. I believe the planned changes are irresponsible, are based on a planning horizon that is too long to avoid risk and deliver certainty, will destroy the character of Knowsley Village and compromise the Knowsley Village Conservation Area. (Ref. HISTORIC ENVIRONMENT STRATEGY KNOWSLEY COUNCIL 11/7/13)

I challenge the modification on the following **material** grounds:

- **Existing policy:** the modification contradicts local, strategic and national planning policies;
- **Highway issues:** Knowsley Lane cannot accommodate the volume of traffic that will be generated by extended development generating adverse community and economic impact;
- **Capacity of physical infrastructure:** the introduction of over 50% more dwellings would impose disruption by demanding that existing infrastructure is renewed AND cause issues in the drainage at Knowsley Village which is already problematic;
- **Nature conservation:** there will be significant negative impacts on the Conversation Area;
- **Unacceptable pollution:** aspects of Knowsley Village are high polluted, adding c1,000 homes and cars will exacerbate this issue with the potential to cause healthcare problems.

And the following **non-material** grounds: *Historic landscapes

- **Problems arising from the construction period:** a protracted development period will subject existing residents to excessive disruption, noise, pollution, service interruption and delays;
- **Loss of view:** many residents have chosen Knowsley Village due to its scenic nature and the quality of outlook available from many properties especially those at the outskirts;
- **Loss of property value:** the economic law of supply and demand suggests that the greater availability of property will have an adverse effect on price, a period of flat house prices would enable this phenomenon to be examined and proven.

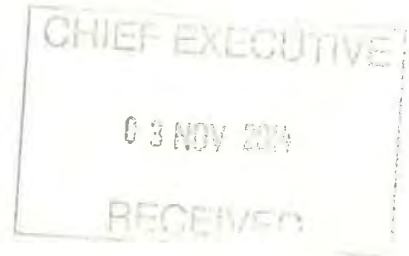
* Wellbeing
- open spaces

We, the residents of Knowsley Village petition the planning department of Knowsley MBC to:

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

Yours Sincerely,





Our Ref: MJH/EMC/D24.01

31st October 2014

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

Dear Sirs

Lord Derby recognises the need for more housing in the Borough and the Council's need to plan for the future needs of the area.

However, in response to the public consultation, Lord Derby has reviewed the proposed number of dwellings at Knowsley Village having regard to the views of residents of the village. He questions whether 1093 dwellings could be satisfactorily accommodated and encourages Knowsley Council to consider the implications this number of dwellings would have on the village before formally allocating this site for development. Knowsley Council must ensure that any future development is the correct size for Knowsley village and is proportionate.

Lord Derby would welcome a thorough investigation of the impact such development would have on Knowsley Village and its community as a matter of urgency.

Yours faithfully



M J Harker

c.c. Stuart Barnes

THE STANLEY ESTATE & STUD COMPANY



AGENT : M J Harker FRICS



Website: www.knowsley.com



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PART A - PERSONAL DETAILS

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

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I write in connection with the above Planning application. I have examined the Plans to remove the green belt. I wish to strongly object to the ~~not~~ removal of this. Our village has a historic back ground, which I feel make this village unique. To have land used in a manner which over populates the area is extremely upsetting.

Continue on a separate sheet if necessary...

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Signature.. 

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



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PART A - PERSONAL DETAILS

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

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

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

PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

KGBS6

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

I feel certain that an excellent forward thinking Knowsley Council would look to existing brownfield sites for industrial development and seek other ways to increase housing stock without compromising naturally beautiful areas. The legacy for our children is a beautiful sustainable environment to inspire and enjoy; an aspirational environment. High density housing with little green space has already proven to be detrimental to society - let us be creative and conservative.

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature



Date.....13.....November 2014

From: Patrick ORourke [REDACTED]
Sent: 15 October 2014 13:00
To: [REDACTED]
Subject: Alternative proposal

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern,
My name is Patrick O'Rourke, a resident of Berry Hill Avenue Knowsley Village,
I wish to put to you an alternative to the proposed removal of greenbelt land,
and the building of 1093 residential properties. I have carried out extensive research
and an extensive survey which included,
Knowsley Village, Stockbridge Village and Kirkby, on a proposal to use and establish
2000 allotments on the designated area, nearly all the feedback was extremely
positive, and showed that once advertised, all plots would be taken within the
first day, of being published, research also shows that around the country, there are millions of
people on an average of a minimum 5 year waiting list for an allotment.

It is indeed, big business, if the proposed plots were rented by Knowsley council
to residents at a minimum of £20 per month, this would bring in the Council
£480,000 income per year.

All i ask, is that the Council would consider this proposal.

Look forward to your response.

Thank you,

Patrick O'Rourke



13 NOVEMBER 2014

LOCAL PLAN TEAM,KNOWSLEY COUNCIL

Dear Sir/Madam, RE: REPRESENTATION TO LATEST PHASE
OF CONSULTATION, ON THE KNOWSLEY CORE
STRATEGY,

please find enclosed a copy of
my latest representations regarding the Knowsley
Core Strategy. Should you have any
queries about any of the content, then
please do not hesitate to contact me.

Yours faithfully



PAUL SLATER

REPRESENTATION NO: 005



Further representations in regards to the Knowsley Core Strategy,
in light of new information emerging (November, 2014)

These notes form a representation regarding the emerging Knowsley Core Strategy, in respect of new developments, and the subsequent generating of new information since the sittings of the public inquiry (November, 2013 and July, 2014). These are mainly a result of the recent grantings of planning permissions, along with a present, recently submitted planning application for the Everton Football Academy, at Finch Farm, Finch Lane, Halewood, which will have implications for the proposal to move the Green Belt boundary in this area (site KGBS20 –Halewood – East (South)).

1.0 I remain of the view, especially in the light of the latest population forecasts released by the Office of National Statistics, in May, 2014 (which show a much lower rate of population growth for Knowsley than previous figures) that the target figure of 8100 new dwellings over the plan period is too high, and that density assumptions are too low. I presented my reasoning behind this in my written representations of December, 2012 and of July, 2014 (P.Slater – representor no:005), along with attendance at the public inquiry sittings in November, 2013 and July, 2014. In the July, 2014 representation, I made reference to the figures (and forecast population age structures) contained within the Sub National Population Projections Update (Document SD31).

1.1 I still hold the view that the amount of Green Belt land being proposed for release is excessive, and that some of the sites should be re-considered, and remain as Green Belt. Likewise, the land at Knowsley Village is not required to meet any housing need during the plan period, and should therefore remain within the Green Belt.

1.2 If Knowsley were to adopt a lower figure for new housing, this would greatly reduce the amount of Green Belt land needed for development. A lower figure would not translate as a decline for Knowsley, but would result in a lower, more sustainable, rate of growth.

1.3 The net housing completions for Knowsley have been dragged down by the large number of demolitions that have also occurred. Account should be taken of how long these properties were empty, prior to demolition. Additionally, discounting should be applied to the demolition numbers to take into account the high vacancy rates that occur across Knowsley¹.

1.4 Knowsley have adopted what appears to be a simplistic predict and provide approach. This will result in development being directed to more profitable Green Belt locations regardless of environmental or regeneration considerations. There should be a brownfield site first policy. A lot of previously developed sites have been assumed to have lower capacity than their actual potential, and this reduced capacity has been used to assess their supply potential. Subsequently, there is more pressure upon Green Belt sites.

¹ Knowsley Local Plan Monitoring Report (2012) states that there are 2020 empty homes in Knowsley (Section 3.65, page 30).

This representation is split into four parts:-

- (2) Discounts applied to sites within the SHLAA.
- (3) Assumed capacities of housing sites.
- (4) New sites, not identified in the Initial Housing Land Supply (November, 2013).
- (5) Proposed new boundary of Green Belt at site KGBS20 (East of Halewood (South)).

2. Discounts applied to sites within the SHLAA

2.1 In the Inspector's Preliminary Assessment of Land Availability (IPALA), issued 11 November 2013, a number of discounts were applied to sites listed in the SHLAA. I have a number of concerns at these discounts. As will be subsequently shown, some of the sites that were subject to discounting have since been given planning permission, for numbers of dwellings above the initial assumed capacity for these sites.

2.2 The figure for an annual provision of 450 dwellings per annum, arrived at by Knowsley Council already factors in past under-delivery against the target figures (for the pre-2010 period). This includes for the period of time, when the annual target had been set at 230 dwellings per annum. Additionally, a 20% buffer has been applied, for more recent under-delivery. Knowsley Council has also risk-assessed the sites within the SHLAA, factoring in their own discounting. This latter process has therefore under-estimated the actual capacity of previously developed, and other sites identified within the existing urban area.

2.3 Some of the sites to which discounts have been applied are largish sites, with potential for fairly high capacities. Applying discounts to the capacity of sites identified within the SHLAA further skews the balance, in favour of developing Green Belt sites, to the detriment of brownfield, previously developed sites.

2.4 All of the risk assessments and discounting add up to a large number of dwellings that have been deducted from the potential housing supply. The fact that these sites exist, and have potential, should be an important factor. Their existence (along with the large number of empty properties in Knowsley) would suggest that exceptional circumstances do not exist for the removal of land from the Green Belt, to provide housing land. Government policy could well change within coming years, to incentivise the development of brownfield land within the existing urban area. The National Planning Policy Framework (Section 17, page 6) encourages the effective re-use of previously developed land.

2.5 Below are some indications of sites, where planning permission has been recently given, at particular sites, for numbers of dwellings above the yield given in various Council documents, such as the SHLAA, and well above the supply assumed, after discounting had been applied.

2.6 Site KO440 (land at Larch Road, Huyton), is shown in the SHLAA as having a potential yield of 87 dwellings. This site is listed in the IPALA for a 20% discount. The Initial Housing Land Supply (IHLS) produced by Knowsley Council in November, 2013 also shows a 20% discount applied to this site. However, in September 2014, planning permission was granted for the erection of 127 net dwellings at this site. This represents a 46% increase

on the yield given in the SHLAA. The number of dwellings also works out at a figure of 81% higher than the discounted yield. Furthermore, this site was not listed in the 2011 SHLAA. This is an indication of how new housing sites, not previously identified can come forward.

2.7 At Pinnington Place, Huyton, planning approval has been granted for 20 flats, in two buildings (planning application 13/00782/OUT). This site is listed in the IHLS document, with a capacity of 6, to which a 20% discount has been applied.

2.8 Likewise, planning permission has been given for 14 dwellings at St. Georges Church Hall, St. Georges Road, Huyton (planning application: 14/00035/FUL). This site is listed in the IHLS with a capacity of 7, to which a 66% discount had been applied. Additionally, this site had been pushed back into the 6 – 10 year housing supply.

2.9 In connection with this, in the 2012 SHLAA, site KO339 (the Hilton Grace Community Centre, The Avenue, Halewood) is shown with a potential yield of 16 dwellings. This was updated to 21 units in the IHLS. However, a 20% discount was applied. In December 2013, planning permission was granted for 21 no. dwellings at this site (planning application: 13/00497/FUL).

2.10 There are a number of sites with large capacities for potential housing that have had discounts applied to them. This discounting multiplies up to a large number of dwellings (the land for which is present) which have been omitted from the potential land supply (putting further pressure upon the Green Belt). The discounting that has been applied is too severe, and now that there is an upturn in the housing market, and much more activity, it should be re-considered.

3. Assumed capacities of housing sites

3.1 In previous representation (July, 2014) I commented, that I believed the assumed average densities for identified sites, were too low. I note that Knowsley Council acknowledge that densities used in the SHLAA are conservative. This is highlighted in section 3.5.1 (page 40) of the Housing Position Statement (Examination library document SD22). It is also clearly shown in Table 3.13 (page 40) of this document, where a higher figure of average densities is given for sites with extant planning permission. This table (3.13) shows the SHLAA 0 to 5 year supply with an average density of 33.2 dwellings per hectare (31.2 dwellings per hectare for years 6 to 10). Extant planning permissions have an average site density of 37.5 dwellings per hectare.

3.2 This difference of 4.3 dwellings per hectare (difference of 6.3 dwellings for years 6 to 10) could multiply out at a large number of dwellings, when the numbers and sizes of all the various sites are taken into consideration.

3.3 Recently, planning permission was granted for the construction of 207 dwellings on the former golf driving range, Bank Lane, Tower Hill (13F/00393/FUL). This site has previously been identified as having potential dwelling capacity for 131 dwellings (Table 10.1, page 157 of the 'Planning for Housing Growth' – Technical Report). The approved planning permission gives an increase of 58% on the original assumed capacity of this site. This

shows the over-cautious approach of Knowsley in assessing the potential residential capacity of sites.

3.4 Although the above site is within the present Green Belt, it does not appear to be as contentious a site as other sites that have been identified for potential release. Outline planning permission has been granted for housing at this site. Assuming that this land is removed from the Green Belt, the site is likely to be developed within 5 years, and therefore has the potential to contribute to the five year housing land supply.

3.5 Section 3.36 (page 14) of the 2012 SHLAA states that 'there are no wholly apartment/high density schemes within the identified SHLAA supply'. Recently, planning permission was approved for 2 No. apartment blocks (to provide 24 apartments) on land at Thingwall Hall (planning application: 14/00085/FUL). This site is just under half a hectare in size, giving a density of 48 dwellings per hectare.

3.6 This latter site is part of the Thingwall Hall development, which has planning permission for 525 dwellings. The area of land, where there is an intention to build the 24 apartments (following the grant of planning permission) was originally ear-marked for seven detached properties. Not only do the new plans increase the density, but there are now likely to be more than 525 new units constructed at the overall site. This factor is mentioned in Section 6.2 (page 20) of the Planning Statement (produced by Turley Planning) which accompanied this planning application.

3.7 It is worth noting, that in the adopted Replacement Knowsley Unitary Development Plan (2006), under Policy H2 'Sites allocated for housing development', Thingwall Hall (site H4) has an estimated capacity of 350 dwellings. This site currently has planning permission for 525 dwellings (presently under construction). Additionally, as has been indicated above (and recognised in the planning statement, that accompanied the recent planning application for apartments here), this figure is likely to be higher still.

3.8 The Pinnington Place, Hutyon development (planning application: 13/00782/FUL) is for 20 flats in two buildings, another example of a high density development.

3.9 This shows that some of the assumptions made within the 2012 SHLAA are no longer valid. These factors would also suggest that exceptional circumstances do not exist for removing other sites from the Green Belt, and the subsequent harm that will be caused to the Green Belt in those areas.

4. New sites, not identified in the Initial Housing Land Supply (November 2013)

4.1 Section 3.3.77 (page 36) of the Housing Position Statement states that 'in recent years, Knowsley has achieved significant numbers of housing completions on sites that are not allocated.'

4.2 A number of sites that are not identified in the Initial Housing Land Supply have subsequently been given planning permission. These include planning permission for

application 13/00560/FUL – conversion of office building to 5 No. apartments (Prescot Citizens Advice Bureau, 10 Church Street, Prescot).

4.3 Also, the site of former storage tanks, Blundell Road, Prescot (planning application 14/00488/OUT) erection of 3 No. three-bedroomed houses.

4.4 There are also some submitted planning applications (not yet decided) for sites not identified within the IHLS.

4.5 Mention has already been made of sites that came forward in the 2012 SHLAA, which had not been mentioned in the preceding SHLAA.

4.6 Additionally, there is the potential contribution from conversions. Between 2003/2004 and 2011/2012 there were 191 conversion gains (Knowsley Housing Position Statement). This gives a mean of 21 per year. Whilst there have also been some losses to conversions, there has been a net gain from conversions. The conversion gains show the potential from this source. This potential will now be higher due, to the easing of Government restrictions on the conversion of former office space to dwellings.

5. Proposed new boundary of Green Belt at site KGBS20 (East of Halewood (South))

5.1 The Green Belt Technical Report (TR03), produced in July, 2013 claims that the existing Green Belt boundary at site KGBS20 (East of Halewood (South)) is inconsistently defined by Baileys Lane and development which encroaches into the Green Belt in places, along here. Knowsley Council believe that Finch Lane will provide a clear and defensible Green Belt boundary. At the public inquiry in November, 2013 it was pointed out that by pushing the present, clearly-defined Green Belt boundary further out to the east (to Finch Lane), this would not make this boundary more clearly defined, or more defensible (in fact quite the reverse).

5.2 It was highlighted at the November sittings, that a football academy (the Everton Finch Farm complex) has been given planning permission in recent years, on land along the eastern side of Finch Lane (within, and completely surrounded by, Green Belt land). At the time that this was given planning permission, it was recognised by Knowsley Council that the complex was not really appropriate for a Green Belt site, but that special circumstances existed, to outweigh the harm that would be caused to the Green Belt.

5.3 This football academy occupies what was previously open farmland. In addition to a number of new buildings, there is an access road, areas of car parking, hard surface pitches (and associated lighting). The site is now enclosed by high fencing. Most of the site is screened by bunding and landscaping (comprising dense plantings of trees and shrubs), and there are some solid, wooden screening fences in places.

5.4 Formerly (prior to the development of the football academy), unrestricted views were affordable looking east and north from Finch Lane, across the open, unenclosed farmland. The only site along Finch Lane, adjacent to the football academy, where there is a present sightline extending beyond the perimeter boundary, is at the main entrance into the site.

5.5 A planning application (14/00665/FUL) has recently been submitted to Knowsley Council for what is described as Phase One of the expansion of the football academy at this location. The fact that this planning application refers to Phase One, suggests that other phases are planned. The current planning application includes the erection of a new building, extension of an existing building and the creation of additional car parking spaces. These are all proposed developments that will encroach into the Green Belt here, increasing the mass of built development at the site, and if approved, ensuring that Finch Lane will become a poor boundary. If the Green Belt boundary is pushed to Finch Lane, this will result in an unclear, weak boundary to the Green Belt (especially in consideration of further planned phases of expansion for the football academy).

5.6 Removing site KGBS20 from the Green Belt, will result in a clear intrusion into what is presently open countryside, reducing the separation distance between the built-up areas of Liverpool and Widnes. This will result in harm to the Green Belt, and the reasons for keeping land in it.

Paul Slater (representation identification no: 005)

November, 2014

References

Green Belt Technical Report (Document TR03)

Initial Housing Land Supply (November, 2013) (Document AD38)

Inspector's Preliminary Assessment of Land Availability (November, 2013) (Document EX23)

Knowsley Housing Position Statement (July, 2013) (Document SD22)

Knowsley Local Plan Monitoring Report (2012)

Knowsley Strategic Housing Land Availability Assessment (2011)

Knowsley Strategic Housing Land Availability Assessment (2012)

Knowsley Unitary Development Plan (Replacement Plan, 2006)

National Planning Policy Framework (2012) Produced by the Department of Communities and Local Government

P.Slater (Representor No:005) - Representations regarding the emerging Knowsley Core Strategy (December, 2012 and July, 2014)

Planning for Housing Growth in Knowsley (July, 2013) (Document TR01)

Planning Statement for Thingwall Hall (Phase 2) Knowsley (June, 2014) produced by Turley Planning

Sub National Population Projections Update (Document SD31)



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

Knowsley Council



RETURNING THIS FORM

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

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

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

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

PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	Solicitor
Name	PAULA ROBINSON	Middleton Solicitors
Job Title (if appropriate)	PHYSICALLY INCAPABLE TO TAKE A JOB	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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

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

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Signature



Date *11.11.14* November 2014

Local Plan Team, Knowsley MBC,
1st Floor Annex, Municipal Buildings,
Archway Road, Liverpool, M36 9YU.

Dated: Thursday 13th November 2014

Green Belt Modifications at Knowsley Village Reference KGBS 6

Dear Sir / Madam,

I am writing regarding the Green Belt modification at Knowsley Village reference KGBS 6 in the local plan for 2014. I believe the planned changes are irresponsible, are based on a planning horizon that is too long to avoid risk and deliver certainty, will destroy the character of Knowsley Village and compromise the Knowsley Village Conservation Area.

I challenge the modification on the following **material** grounds:

- **Existing policy:** the modification contradicts local, strategic and national planning policies;
- **Highway issues:** Knowsley Lane cannot accommodate the volume of traffic that will be generated by extended development generating adverse community and economic impact;
- **Capacity of physical infrastructure:** the introduction of over 50% more dwellings would impose disruption by demanding that existing infrastructure is renewed AND cause issues in the drainage at Knowsley Village which is already problematic; ✓
- **Nature conservation:** there will be significant negative impacts on the Conversation Area;
- **Unacceptable pollution:** aspects of Knowsley Village are high polluted, adding c1,000 homes and cars will exacerbate this issue with the potential to cause healthcare problems.

And the following **non-material** grounds:

- **Problems arising from the construction period:** a protracted development period will subject existing residents to excessive disruption, noise, pollution, service interruption and delays; ✓
- **Loss of view:** many residents have chosen Knowsley Village due to its scenic nature and the quality of outlook available from many properties especially those at the outskirts; ✓
- **Loss of property value:** the economic law of supply and demand suggests that the greater availability of property will have an adverse effect on price, a period of flat house prices would enable this phenomenon to be examined and proven. ✓

We, the residents of Knowsley Village petition the planning department of Knowsley MBC to:

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

Yours Sincerely,

[Redacted Signature]



Knowsley Local Plan: Core Strategy

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	Solicitor
Name	PAULINE COLUMBINE	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation Save Knowsley Village Green Belt Group

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

Modification Ref KGBS6 Policy Ref SUE1 AppE Paragraph Ref 2 and 6A.9

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- Infra structure of Knowsley Village is insufficient to accommodate such expansion.
- Destruction of village exclusive Rural outlook
- Value of properties existing will be de-valued with new properties + construction work on doorstep
- Wild life affected by building
- Increase in crime with influx of people from other areas

Continue on a separate sheet if necessary...

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

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

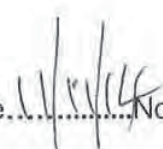
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Signature.....



Date.....November 2014



Mr Peter Campbell



RE: Knowsley Local Plan: Core Strategy Proposed Modifications.

14th November 2014

Dear Sir / Madam,

I write in connection with the above planning proposals. I have examined the associated documents and I know the Knowsley Village area very well. I wish to object strongly to the proposed modifications.

Accordingly, I oppose the proposed modifications and any future developments arising from this on the following grounds.

- * Allowing building in future will harm to the character and appearance of the Village and the conservation Area. It would have a devastating adverse impact on very attractive rural landscape.
- * Detrimental to the setting of the village, which has been protected for over many, many years and we would lose vast amounts of open countryside.
- * Building on this land in future which would be so readily visible in this location would mean that the rural landscape was damaged beyond repair, thus effectively paving the way for creeping urbanisation.
- * Currently, there is already a lack of sufficient school place which will only be made worst by developments such as this within the local area.
- * The traffic outside is already a major hazard outside my home, to the extent that I cannot allow my children outside my front door unsupervised. I have on numerous occasions had vehicles drive across my open plan garden due to the location of my home on the corner of Tithebarn Rd & Sugar Lane. Sugar Lane and Ormskirk Road are already very dangerous due to the weight of traffic using these roads as main through roads and since the opening of offices on Ormskirk Road by Lord Derby's Estate. Any more traffic in this area would make certain areas gridlocked at times and already more congested / dangerous than it currently is.
- * The Doctors in the area would not be able to cope with more clients, they are already overstretched and my family have recently had to wait as long as 4 weeks for appointments.

Looking through the modifications any future plans to develop in this area are just not sustainable and there needs to be further investigation to identify best sites for development across the district. As all future developments need to be sustainable.

For the reasons set out above, I strongly request that Knowsley Council refuse these proposed modifications.

Yours faithfully,



Peter Campbell



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE
17 OCT 2014
RECEIVED

Knowsley Council

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PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR & MRS	
Name	Ray Harrison & Lesley Harrison	
Job Title (if appropriate)	Retired Receptionist	
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

Knowsley Local Plan - Public Consultation

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

Modification Ref

LOCAL PLAN

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.

We live here in Knowsley, and we have since 1980. We bought our Council property in Hanham Road, and decided to buy, because of the beautiful Green Belt area around us. We have brought two daughters up here. It is a lovely place to live, and was once known as Knowsley Village, and that's why most of us decided to live here, the wildlife around us, the facilities we have here, our two small schools, our medical centre were adequate for our village. We now know why our village became a Town, to introduce this Unity Development Plan. We do not want this passed, because this is a small area, and to build Council property's here, although we know how much these properties are needed, it would destroy our area. There would be a health and safety risk, our roads in and out, from Knowsley Lane, would be overloaded and dangerous, for our children, and elderly residents

Continue on a separate sheet if necessary...

need: Objection to Green Belt being sold off.

We have many elderly residents who live here, we need to support them. If this Plan was to be passed, and hopefully it won't, the areas we live in now, would need a lot of work, for instance, a complete new drainage system, our roads and drains are always flooded when we have our bad weather. The medical Centre, were I work, just about copes with the residents living here now. Our schools are only small Primary schools. We have never had a Secondary school, our children have always had to travel on buses, outside the area. Also our fishing areas, that provide a peaceful tranquillity for our residents and visitors. Our squirrels and birds, and wildlife we enjoy, would all go. You have to live here to appreciate the beauty around us. The Knowsley Industrial areas, and Kirby surrounding us, have plenty of space to build Council properties. Why Not use these areas.

Please do not Destroy, what was once our Village
We do not want to be Removed from Our Green Belt Areas
There are Plenty of Non Green Belt to sell to the Government.
(Why is everything, always about Money) Please think out of this
Box for once, and do the Right Thing. Those of us living, P.T.O

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 13.10.2014

near the Green Belt Areas, is the fact it
is the home of all our Wildlife & Nature,
Without the Green Belt, there will be no nature.
Please Re-consider these Green Belt-areas

Yours Sincerely



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

Instead of selling of our Green Belt land.

Build on Knowsley & Kirby Industrial Areas

Also all the land opposite the 'Show Case Cinema'
off the East Lanes
(which was for properties to be built) that is still
empty. Why not build there.

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



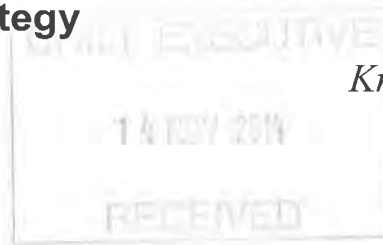
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PART A - PERSONAL DETAILS

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

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Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

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

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

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

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

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

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I WOULD ALSO ADD THAT I DO NOT BELIEVE THE STRATEGY TAKES ACCOUNT OF THE HEALTH AND WELLBEING OF THE RESIDENTS OF THE VILLAGE. KMBL PLANNING DEPT. SEEM TO BE WORKING IN TOTAL ISOLATION WITHOUT REGARD TO NHS STRATEGIES. FURTHERMORE KMBL ARE SHOWING SCANT REGARD TO CURRENT NATIONAL THINKING REGARDING 'REGIONAL EMPOWERMENT' AND ASSOCIATED PLANNING STRATEGIES. HAVING SEEN RECORDINGS OF KMBL'S PLANNING TEAMS PRESENTATIONS I AM AMAZED TO SEE THE INSPECTOR BEING SHOWN AS INTRANSIGENT IN HIS THINKING ON 'BROWN FIELD' SITES, WHEN IT IS CLEARLY THE PLANNING TEAMS LACK OF PROGRESS IN THIS AREA OVER THE YEARS WHICH IS FORCING HIM INTO THIS POSITION.

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

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

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

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Signature

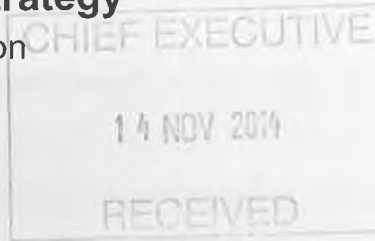
[Redacted Signature]

Date ^{11TH}.....November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
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Knowsley Council

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PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	Solicitor
Name	RAPMOND O'NEILL	Middleton Solicitors
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

- | | Yes | No |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

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THIS PROPOSAL WILL DO MORE HARM THAN GOOD IN TERMS OF DESTRUCTION OF THE PRESERVED LAND TO THE RESIDENTS, THE WILDLIFE, THE INCREASED TRAFFIC, THE LACK OF FACILITIES FOR DOUBLE THE AMOUNT OF PEOPLE AS WELL AS INCREASED POLLUTION TO OUR ENVIRONMENT.

TO DESTROY THIS ANCIENT LAND FOR HOUSING WOULD BE A TRAVESTY.

KEEP KNOWSLEY VILLAGE AS A VILLAGE AND DO NOT TURN IT INTO A TOWN.

WE NEED TO KEEP THE LOVELY VILLAGE OF KNOWSLEY JUST THE WAY IT IS.

Continue on a separate sheet if necessary...

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 

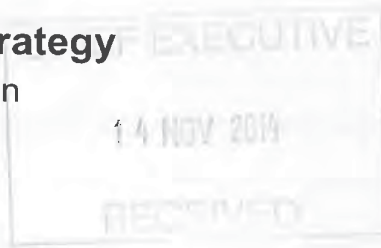
Date.....11th.....November 2014



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

Knowsley Council



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

PART A - PERSONAL DETAILS

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

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

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

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

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

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b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village. *THIS BUILDING PROGRESS & CHANGES WILL RUIN THIS NOISY VILLAGE & DEPRIVE THE PRESENT LAND OWNER*

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Signature

[Redacted Signature]

Date: 11.11.14 November 2014

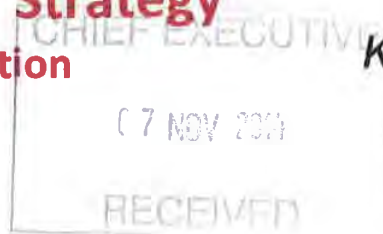


Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



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PART A – PERSONAL DETAILS

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

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Flukers Brook Farm



6 November 2014

Dear Sir

I am writing with regards to the land in Knowsley Village which could be safeguarded for future development which according to your maps has not been chosen.

I have some points which I would like you to address.

1. Why is only Lord Derby's land safeguarded for future development?
As this keeps a green edge to the village.
2. If field numbers 1538 2972 3975 0985 were to be used for development this would cause less disruption for the residents of Knowsley Village.
And also it would make the Village Hall, Church and the Derby arms Pub more central to the village
3. Why should a small amount of people decide the future of the land around the village who probably are not residents?
4. Why have the local landowners not been consulted for their opinions before the UDP was published?
5. Where is the surface water going to go? What plans are in place for this?

I enclose two copies of correspondence referring to the UDP from my land agent from which you will see I did write to the council in the past.

Also enclosed is a map with my land outlined in red .

Yours faithfully



Robert Jackson

2.

17th November 2003

Mr. R.T. Jackson

We would propose that we send a letter to the council stating that we do not intend to submit any formal representations in respect of the U.D.P. but wish to point out that your land (which we will identify on a plan) is available and potentially suitable for housing and/or employment use and also for the relocation of recreational facilities etc. to free up other urban sites for development.

I look forward to hearing from you with your instructions. Representations to the U.D.P. have to be submitted by 8th December.

Yours sincerely,



P.A.E. JOHNSON
for Frank R. Marshall & Co.

R.T. Jackson.



MARSHALL
CHARTERED SURVEYORS

Mr. R.T. Jackson,


Your ref:

Our ref: PAEJ/HD

Date: 30th November 2007

Dear Robert,

Re: Representations to Knowsley MBC re. Call for Sites

I confirm that I have submitted on your behalf forms for the council to consider two sites for potential development, one being the land at Church Farm and the other being the land between the motorway and Knowsley Lane.

I enclose herewith a fee account in respect of this matter.

Yours sincerely,


P.A.E. JOHNSON
for Frank R. Marshall & Co.
e-mail: 

Enc.

PROPERTY CONSULTANCY
VALUATION
LAND & ESTATE AGENCY
AUCTIONEERING
PLANNING & DEVELOPMENT
AGENTS FOR AMC plc

PARTNERS

Thomas R Rickard
FRICS, FAAV
Alan N Lane
FRICS, FAAV
Nicholas C D Marsh
FRICS, FAAV
Paul A E Johnson
BA, FRICS, FAAV
Roy L Brereton
FRICS
Peter J Ashburner
FRICS, FAAV
C Gwyn Williams
BSc, MRICS, FAAV

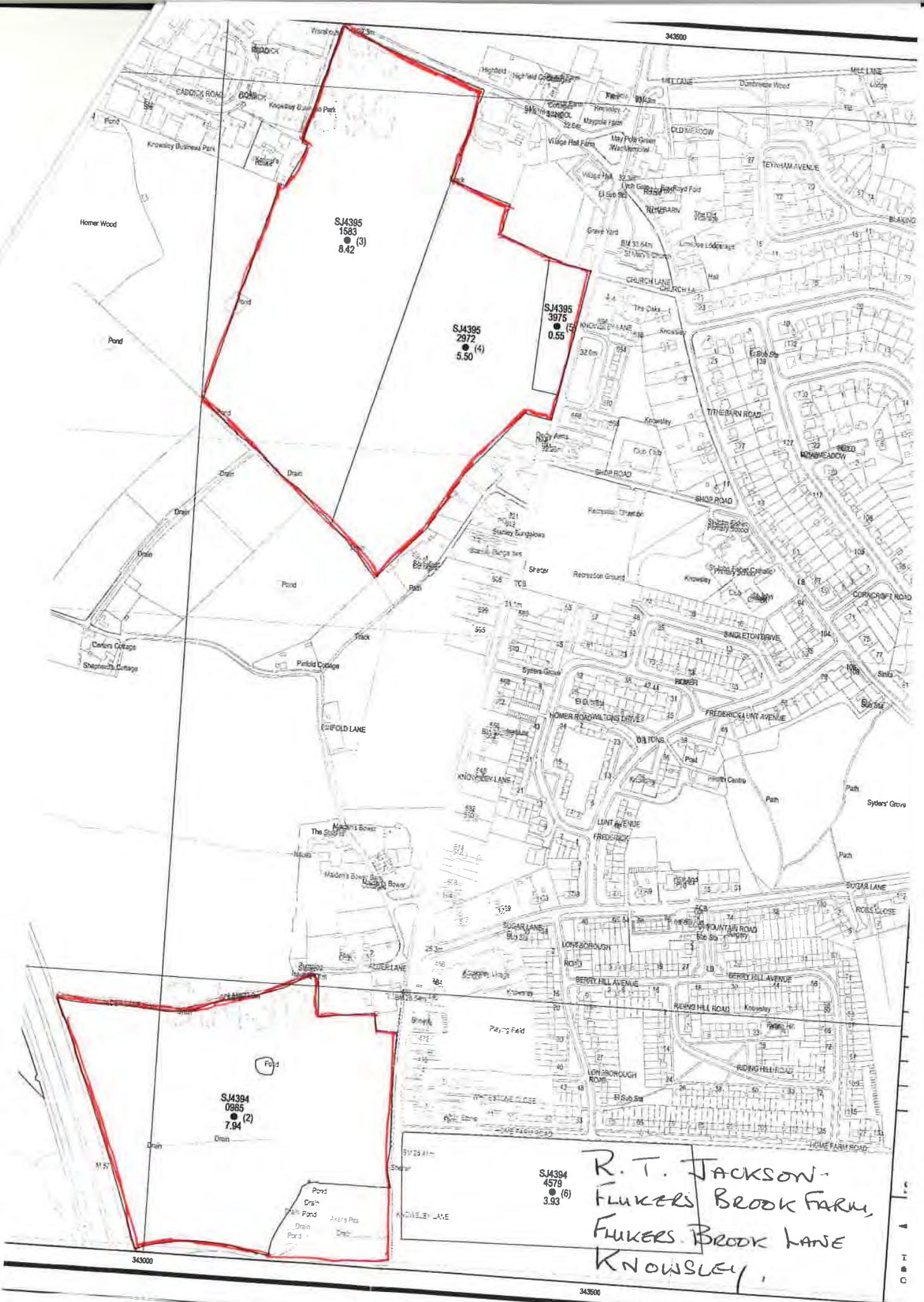
ASSOCIATES

James M G Woods
MRICS, FAAV
Roger Lee
FRICS
A. Roy Waller
J. Farrell
A. Partridge
N. Tomlinson

Financial Secretary
& Accountant
Roy Smith MBA MCM1

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and
Chelford
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Centre



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R. T. JACKSON-
FLUKERS BROOK FARM,
FLUKERS BROOK LANE
KNOWSLEY,

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Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
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Knowsley Council

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

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Save Knowsley Village Green Belt Group

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Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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I WOULD LIKE THE VILLAGE IN WHICH ME AND MY WIFE LIVE IN TO STAY AS SUCH ITS BEEN A VILLAGE FOR HUNDREDS OF YEARS AND I BELIEVE IT SHOULD CARRY ON BEING SO +

Continue on a separate sheet if necessary...

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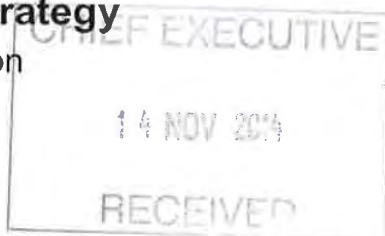
Date... 12 November 2014



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	Personal Details*	Agents Details*
Title	Mrs	Solicitor
Name	Drakefield	Middleton Solicitors
Job Title (if appropriate)	Retired	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
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KGBS 6

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

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

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

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

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

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

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

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature.

[Redacted Signature]

Date.....November 2014

If the Council's plans are allowed to go ahead, the beauty and character of Knowsley Village will be changed forever.

Remember it was that character and that beauty and the pride with which people held it, which was the reason its name was taken for the new "Knowsley Borough."

At that time it was a haven where people longed to live.

Since that time the Village has suffered, if the Council's plans go ahead there will be no going back, its old world rural character which the early council members appreciated will be gone forever!

Surely the Council can see that the keeping of what was once called "The Jewel in its Crown" is more important to the status of the whole borough than ruining all that made it special?

This area still retains some of its rural past which should be cherished in this age of excessive building and pollution.

Already the parking by locals and workers from the Industrial Park is often excessive outside of the shops on Sugar Lane.

Parking outside the school also on Sugar Lane becomes a real problem in the morning and afternoon, to a lesser degree there is also parking on Knowsley Lane at those times.

How much worse will it become with over 1000 more houses and yet more industry at the top of Knowsley Lane.

I believe we all have the right to breathe clean air and enjoy open space.

Regarding the changes already seen in the Village, in recent times we have noticed a change in the varieties of birds which visit our garden which has also been noticed by others.

Most significant is the complete lack of some finches and thrush which just aren't seen any more.

It is generally thought to have started with the spread of the Industrial Estate.

Taking away the Green Belt status of this village can only be detrimental to the lives of the residents, wild life and a village which is already suffering.

Buying a home here is already not the attractive investment it once was, it is said the most expensive properties aren't selling and the ex council properties just get snapped up by investors.

That's not a good situation, how much more difficult will it become with over 1000 more properties, we have all seen once nice areas can be ruined because of over, building.

Knowsley Borough needs the Green Space Knowsley Village provides, the roads and amenities will not cater for such a big increase in the population.

Also surely Knowsley Council can see can see the advantage of keeping its Borough, surrounded by Green Belt which its residents can and do, get out and enjoy.

S Drakefield

[REDACTED]

From: [REDACTED]
Sent: 14 November 2014 10:07
To: [REDACTED]
Subject: Re: Knowsley Local Plan: Core Strategy Proposed Modifications.

Follow Up Flag: Follow up
Flag Status: Flagged

Mrs S. Dwyer

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

10TH November 2014

Re: Knowsley Local Plan: Core Strategy Proposed Modifications.

Dear Sir / Madam,

I am very strongly against the proposed modifications proposed for Knowsley Village.

I feel that that the already dangerous, Knowsley Lane, Sugar Lane and Tithebarn Road are not suitable as main roads through the village.

The cluttered vehicles parked at the shops on the Village and by the schools are already causing havoc and are dangerous. The proposed alterations and potential future developments will only make this work.

Sugar Lane in particular by the shops is already congested, the parking area is too small, and the street is too narrow for the traffic now using it now. Sugar Lane has parked vehicles up and down the sides, already parking on kerbs as this is the only place they can park and it just does not make access through the Village suitable for any future large housing estate, it would completely log jam whilst the parking at the two Junior schools only makes the traffic situation even worst.

We have seen developments in Knowsley Village over the years but no money has been spent on improvement to the roads and infrastructure.

The doctors / health centre cannot cope as it is, it's almost impossible to get an appointment within 2 weeks of booking.

Allowing building in future will harm to the character and appearance of the Village / conservation Area. It would have a devastating impact on the very attractive rural landscape. Future developments would be detrimental to the setting of the village, which has been protected for many years and we would lose vast amounts of open countryside.

The proposals should not be approved as they would only benefit the council coffers, it's of not benefit to the village.

Yours faithfully,

S. Dwyer

Knowsley Local Plan: Core Strategy**Proposed Modifications - Consultation
Representations Form**

Knowsley Council

27 OCT 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
- 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	STEVEN GRANITE	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

KNOWSLEY VILLAGE GREENBELT REMOVAL

Modification Ref Policy Ref Paragraph Ref

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

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

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

- ORMSKIRK ROAD FLOODS REGULARLY. REMOVING ACRES OF GREEN BELT LAND DIRECTLY FACING WOULD INCREASE FLOODING

- THE ROAD IN/OUT OF THE VILLAGE IS ALREADY CONGESTED WITHOUT AN ADDITIONAL 1,093 HOMES. DOCTORS/SCHOOL INSUFFICIENT.

- WHY DOUBLE THE VILLAGE POPULATION WHEN THERE ARE TOWNS ACROSS KNOWSLEY MORE SUITABLE FOR DEVELOPMENT

- THERE IS LOTS OF WILD LIFE ON THAT LAND THAT NEEDS PROTECTION

- ORMSKIRK ROAD IS THE ONLY ROAD IN KNOWSLEY SUITABLE FOR LARGE BUSINESS OWNERS TO LIVE LOCAL - YOU ARE DRIVING THEM AWAY

- THE VILLAGE IS OLDER THAN LIVERPOOL CITY CENTRE, GREENBELT LAND IS THERE TO PROTECT HISTORIC NATURE - WHY REMOVE IT!

Continue on a separate sheet if necessary...

- LACK OF CONSULTATION. I PURCHASED MY PROPERTY IN JULY 2014 AND NO MENTION OF THIS PENDING ACTION. THIS WILL COST ME SUBSTANTIAL MONEY AS PROPERTY WILL DE-VALUE.

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

- USE ALTERNATIVE LAND. LEAVE KNOWSLEY VILLAGE AS A VILLAGE!
- KNOWSLEY VILLAGE ATTRACTS GOOD PEOPLE THAT THE BOROUGH NEEDS MORE OF - DON'T DRIVE THEM OUT!

Continue on a separate sheet if necessary...

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

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

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

22/10/14

Mrs Suzie Campbell



RE: Knowsley Local Plan: Core Strategy Proposed Modifications.

12th November 2014

Dear Sir / Madam,

I am writing to strongly object to the Knowsley Local Plan Proposed Modifications.

As a home-owner on Knowsley Village I am more than familiar with the already gridlocked state of the main stretches of road through Knowsley Village, particularly Knowsley lane and Sugar Lane. Adding any amount of vehicles to the roads at any time in the future to the local area would completely destroy an already struggling infrastructure..

It is already very difficult to get an appointment at the doctors due to an over subscription to an already struggling surgery. Clearly this proposal will have a devastating effect on the local wildlife, does it need to have an effect on the local death rate for it to become transparent just how abhorrent this idea is?

The local shops are already under significant pressure to service the community as it is. Bringing in potentially thousands more people to the area in future would just be absurd.

As a mother to young children I am well versed in the problems getting local childcare in Knowsley, for many years it has been hugely difficult to get places in local schools or even find nurseries for local children. To potentially add hundreds more families in the area is just complete lunacy.

These are just a few of the obvious practical implications that such a development would have without even mentioning the utterly catastrophic environmental impact building dwellings would have on the local countryside.

Looking at the proposals, there is no sustainable plan which would not have an effect on the conservation area and taking this into account, it should not be allowed to go ahead.

For the reasons set out above, I request that Knowsley Council refuse this planning application.

Yours faithfully,

Suzie Campbell





Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form



Knowsley Council

RETURNING THIS FORM

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

PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	VALERIE O'NEAL	Middleton Solicitors
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)	Save Knowsley Village Green Belt Group	
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

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

Name and/or Organisation

Save Knowsley Village Green Belt Group

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

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

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

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



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

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

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

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

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

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

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

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

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

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

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

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

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

KNOWSLEY VILLAGE IS AN ANCIENT SITE NOTED IN THE DOOMSDAY BOOK WHICH IS OLDER THAN LIVERPOOL AND A HERITAGE SITE WHICH SHOULD BE PRESERVED FOR FUTURE GENERATIONS.

THIS PROPOSAL WILL HAVE A LASTING DAMAGING EFFECT ON THE ENVIRONMENT, THE SURROUNDING ROADS AND TRANSPORT WHICH IS DETRIMENTAL TO OUR VILLAGE. THE WILDLIFE NEEDS TO BE PROTECTED AS DOES OUR ANCIENT VILLAGE.

THE RESIDENTS PURCHASED PROPERTIES BECAUSE OF THE ENVIRONMENT AND BEAUTY OF THE SURROUNDINGS WHICH HAS TO BE PRESERVED.

A THING OF BEAUTY IS A THING TO BEHOUD !!

Continue on a separate sheet if necessary...

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

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

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Signature 

Date...11/11/14...November 2014

27 OTHER SITES

Representations relating to Alternative or Other Sites (i.e. not Proposed SUEs)

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
OTHER SITES 001	1	17	Edward Bean
OTHER SITES 002	1	273	Ian Calvert
OTHER SITES 003	1	105	Matthew Dugdale, Emerson for Orbit
OTHER SITES 004	1	497	Robert Jackson
OTHER SITES 005	1	120	Tony Docherty, Weston House
Total	5		

OTHER SITES 001 ID:17



Local Plan Team
Knowsley MBC
1st Floor Annex
Municipal Buildings
Archway Road
Liverpool
L36 9YU

Mr Edward Bean



Date: 27 October 2014

Tel; [REDACTED]

Dear Sir/Madam

**Re: Knowsley Local Plan: Core Strategy
Proposed Modifications- Consultation**

Please find the enclosed representation form for the above.
Deadline for receipt is 12 noon on 14 November 2014.

Yours



Edward Bean



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	EDWARD BEAN.	
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

EDWARD BEAN. (LANDOWNER)

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

Modification Ref

M064

Policy Ref

CS4

Paragraph Ref

46.

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 reasons for the Text of this schedule of modifications June 2014 is to : ensure consistency with main modifications to Policy CS5 and the introduction of site allocations for locations of Green Belt release via Policy SUE 1. Land at Shrogs farm was considered for release, and rejected on the basis of flawed and inconsistent evidence - REF RC05 letter dated 09 June 2014. Council have approved the release of land in Green Belt. 2014. Bank Lane Kirkby for housing. This arbitrary approach renders the plan. Unsound and unfair.

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.

Recognise the description of Shrogs farm in KLPCS Greenbelt Technical Report July 2013: "not related to existing Green Belt Boundary." Uphold view of land by Capita Symonds Vol. 1 Strategic Flood Risk Assessment Oct 2012 "not susceptible to groundwater flooding" 97% of site is suitable for less vulnerable developments. This is an indication - evidence based - that the land could assist the delivery of large scale distribution, logistics in M064. 46. "Land at Shrogs farm to be included in the sites identified in Policy SUE 1 to help meet the needs in paragraph 3 of Policy 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)

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Signature

EDWARD J. BOAN

Date 27 OCTOBER 2014.



Local Plan Team,
Knowsley council,
1st Floor Annexe,
Municipal Bldgs,
Archway Road,
Liverpool.
L36 9YU.

10th November 2014.

Dear Sirs,

This letter is in response to your request from members of the local community to comment on future development plans for Green Belt areas around Halewood Village.

There appears to be a considerable amount of opposition to further extensions of Halewood in light of the vast amount of housing erected over the past 30 years.

In particular the area that I have marked as area 'A' on the enclosed copy of your plan "Allocation Profile-East of Halewood".

If this area is developed we feel that it would destroy the rural character of Halewood Village irretrievably. In January 2012, following a call for suitable sites for building new homes upon by Knowsley Council, we submitted the enclosed plan drawn up by our Town Planning consultants, McDyre & Co.

Will you please read it again in context to the current consultations?

The main premise of our proposal is that; allowing the 9 acre site that we offer to be taken out of the Green Belt for the erection of new houses will save the area 'A' adjacent to Halewood Village (at present, productive farm land) from being needed.

There has also been a call from central government for self-build sites to be identified in all areas of the country. We were involved in a self-build scheme some years ago in Winsford, Cheshire, which turned out to be a remarkable success. We feel that a similar self-build development could be undertaken on our site.

Not only would our scheme utilize redundant agricultural land but would develop the rural community of Tarbock Green, at present is just a Hamlet of spread out housing, into a sustainable village community.

The site would also be available immediately for development and we would work closely with Knowsley BC to ensure that all safeguards would be met in bringing about an asset to the Borough.

I would please ask you to note that I live next to this proposed development, [REDACTED] which we developed some 12 years ago. This is outlined in our proposal document on page 8.

We would be grateful for an indication as to how you would view our proposal and for you to present this letter and accompanying documents to the Government Planning Inspectors for their views.

Yours faithfully,

[REDACTED]

Ian Calvert.

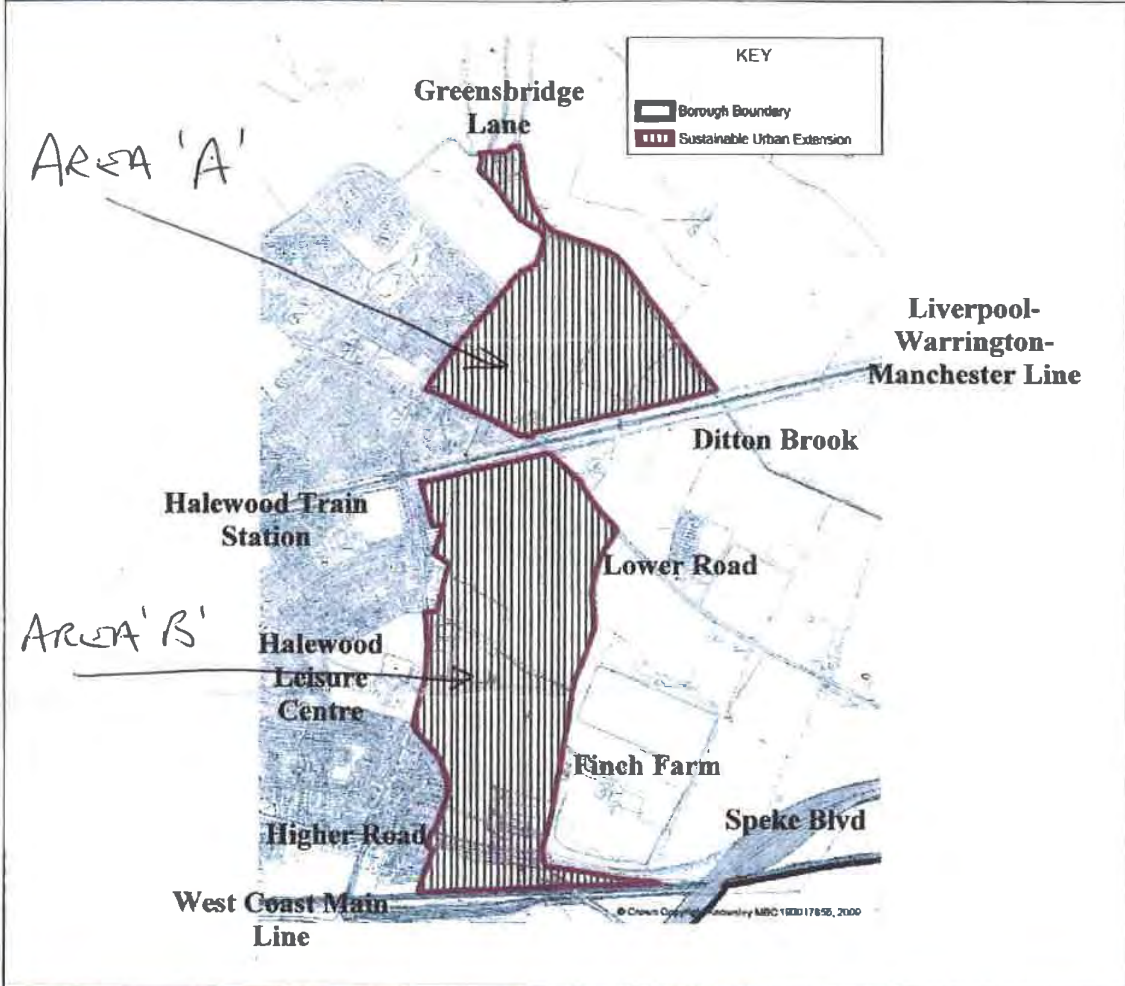
Encl.

Explanatory Statement for the proposed development of a sustainable village community at Tarbock Green.

Allocation Profile-East of Halewood plan.

Allocation Profile – East of Halewood

Site Name	East of Halewood
Gross Site Size	81.86 hectares
Primary proposed use(s)	Residential
Notional Capacity	1124 dwellings



Key Site Constraints and Opportunities

- Flood Zones 2 and 3 fall within the northern portion of the site (Environment Agency Flood Map, February 2014 Update)
- Local Wildlife Site 75 (Ditton Brook, Halewood) is located along the northern boundary of the site
- Bridgefield Forum (Housing Allocation) is located to the north west of the site
- An area of public open space (woodland) is located within the centre of the site
- Policy SUE 2b) identifies specific development and infrastructure requirements and proposes that a Supplementary Planning Document be developed for this site.



McDyre & Co.

TOWN PLANNING CONSULTANTS
PLANNING PROJECT MANAGERS

January 2012

**SUGGESTED SUSTAINABLE VILLAGE COMMUNITY PROPOSAL FOR
INCLUSION IN KNOWSLEY'S SITE ALLOCATIONS AND
DEVELOPMENT POLICY DPD
regarding
LAND ADJOINING GREENSBRIDGE LANE, TARBOCK GREEN**

EXPLANATORY STATEMENT

on behalf of

MESSRS GRAHAM AND IAN CALVERT

McDyre & Co. Ref: PT07

McDyre & Co. are Town Planning Consultants and Planning Project Managers. Our Practice deals with many aspects of planning and development over a broad sphere, including residential, industrial, commercial and leisure sectors. Based in Cheshire we give professional advice to clients over a wide geographical area covering all the North West of England and other areas further afield.

Directors:- B C McDyre M.Sc. (Eng.), D.I.C., Dip.T.P., M.R.T.P.I., Chartered Town Planner, B. McDyre B.Sc.(Hons.)

McDyre & Co. Ltd – Registration No. 2324084 – Place of Registration: England & Wales –

INTRODUCTION

1. The owners of land off Greensbridge Lane, Tarbock are Ian and Graham Calvert. Both live locally. They have recently submitted details of the land to the Council under the current 'Call for Sites' updating exercise. It is shown outlined in red on the attached plan.
2. I have explained to them that they are formally out of time for submitting representations in respect of the Core Strategy. However, this submission is in accord with the Preferred Core Strategy and looks forward to the Site Allocations and Development Policy DPD.
3. I would also point out, that the representation land is too small to have any significant strategic importance to the Knowsley LDF as a whole, so its development would not affect the overall Core Strategy.
4. This representation is therefore submitted as a proposal for inclusion in the forthcoming Site Allocations and Development Policy DPD.
5. Knowsley Chamber of Commerce, which my clients are members of, have indicated their strong support for this scheme. They believe it indicates the direction in which the Borough should be heading in terms of new development, especially with the potential for up-market housing.

SITE DESCRIPTION

6. The land comprises about 3.6 ha. of former grazing land. It was in 'set-aside' for many years until it was sold to its current owners about 10 years ago. They have since tried to rent it to local farmers,

or even let them use it rent free, but it is not good quality land for growing (mostly Grade 3B), whilst the cost of providing stock-proof fencing for grazing is prohibitive, given the poor returns it would generate. Nor does the land benefit from CAP farm payments.

7. The only option in agricultural terms would therefore be some sort of intensive use. Unfortunately for my clients, their application for planning permission for a mixed horticultural use and fishing lake was rejected by the Council in 2006. The land has since been left unused and contributes nothing to the local economy.
8. Nor does the land offer any landscape value because it is simply rough grass. The northern boundary follows the line of a watercourse which is marked by a dense line of trees and hedgerows. There are also trees and hedgerows marking the short eastern boundary. However, the southern boundaries and the western boundary to Greenfields Lane are defined only by low hedgerows.
9. The land is adjoined to the south by Greensbridge Farm which comprises the original farmhouse and a barn conversion scheme which provides a further 8 dwellings. This scheme was approved in 2001.
10. To the west, on the opposite side of Greensbridge Lane is Georgesons Farm, whilst to the north, facing each other along Greensbridge Lane, are two short rows of ribbon development comprising about 20 houses in total. This small group of dwellings lies about 500m south of Tarbock village itself.

CORE STRATEGY PREFERRED OPTIONS

11. The Preferred Spatial Strategy for the Borough, as set out in Policy CS1, includes support for Tarbock as a rural village and ensuring the efficient and sustainable use of land and infrastructure. The strategy also acknowledges the need to review Green Belt boundaries to meet longer term development needs.
12. The key issues identified in the Preferred Options Report include an imbalance between housing need / demand and supply in the housing market, in terms of type, tenure and size. There have been relatively slow rates of construction in recent years and a constrained longer term supply of land for development.
13. The priorities for the strategy include the re-balancing of the housing stock by providing a wide choice of new market sector and affordable housing.
14. There is great emphasis on regeneration needs and opportunities, but they focus on the urban areas such as North Huyton and Kirkby, whilst ignoring problems of the rural areas.
15. Development principles in Policy CS2 focus on sustainability requirements.
16. Whilst Green Belt is still protected from inappropriate development, it is acknowledged that land will need to be removed from Green Belt to meet longer term development needs.
17. All the options for the removal of land from Green Belt, including both land reserved for development during the Plan period and land safeguarded for development beyond 2027, are urban extensions. They are at Halewood, Whiston, Huyton, Stockbridge, Knowsley Village and Kirkby. However, I can see nothing in the strategy that

actually helps implement the Policy CS1 proposal to support Tarbock as a rural village.

18. The smaller of the two options for the removal of land from the Green Belt at Halewood village (i.e. land opposite Tuers Garage) proposes development on land that is currently in agricultural production. By comparison, our site has been unused for many years, so as an alternative its development would safeguard land in agricultural use whilst also helping to preserve the identity and semi-rural character of Halewood village.

THE REPRESENTATION SITE PROPOSAL

19. It is considered that the representation land is suitable for the establishment of a small sustainable community that would help meet the Council's housing land needs, as well as supporting the wider aims of the Preferred Core Strategy and many other local and national aims policies as I discuss below.
20. Even small villages such as Tarbock were once proper communities with their own local shop, post office, pub, school, petrol filling station and church. Over recent years, pubs, shops and post offices have closed. Tarbock is no exception, so the community is losing its heart and identity. Even the village hall, which is still open, is substantially under-used because there is no community to support it.
21. It is therefore proposed to boost the local community by constructing between 80 and 100 dwellings on the representation land. This will also offer the opportunity of either providing additional facilities such as a village shop on site, or supporting the re-opening of the post office and pub in Tarbock that are currently both closed.

22. The purpose of this representation is to introduce the land as a potential development allocation in the Site Allocations and Development Policy DPD.

BENEFITS OF THE SUGGESTED ALLOCATION

23. The main emphasis of the Core Strategy is on sustainability. However, sustainability is ultimately an undefined concept which has general rather than specific aims. Looking at the Preferred Knowsley Core Strategy, urban extensions seem to be regarded as sustainable, but the document does not consider other options such as creating small local village communities in order to, for example, keep open local pubs, shops, nurseries, schools, surgeries, etc.
24. So, although Tarbock is to be supported as a rural village, the Core Strategy does not provide the means to implement this support.
25. It is therefore suggested that my clients' land will provide the opportunity to support the village of Tarbock by creating a truly sustainable community. This is land that is desirable for house building in marketing terms and it could support the provision of a wide range of housing from affordable homes and starter homes through to large executive homes, all of which are in short supply in Knowsley Borough.
26. The benefits of providing new houses need little explanation. They create jobs in construction (estimated at about 1.5 jobs for each house built, plus another 2.5 indirect jobs). In this case, it will be possible to construct and market some dwellings for people with high incomes and they will in turn invest in the area, thereby creating further jobs. New houses will also attract younger people

to help offset the ageing and increasingly dependent existing population structure.

27. The site itself is redundant land which has no CAP subsidy. It has been unused and therefore wasted for at least 30 years. It has been regularly advertised for rent with no takers. It is not good land for growing whilst the boundary fences will not keep stock in for grazing. The cost of replacing the fencing exceeds the potential income from the land, so no such investment will be forthcoming. The owners tried in 2006 to establish an intensive enterprise on the land with a horticultural facility and a fishing lake, but planning permission was refused.

LOCAL ISSUES

Character of the Area

28. Tarbock is historically an agricultural hamlet, but now anyone working in agriculture or many other key areas such as health, local authority, retail, etc cannot afford to live in the area. In Tarbock, pubs and the post office are closed, the village hall stays empty save the occasional meeting. Despite development in Greensbridge Lane recently, there is no meaningful bus service and I note that transport is seen as an issue by Regeneris in its 2008 report. Tarbock is therefore losing its identity as it becomes a small collection of commuter homes, guarded fiercely by their owners from any intrusion into their area. Yet houses rooted into the local community regenerate neighbourhoods. Our proposal could mean making the neighbourhood sustainable by keeping open pubs, local shops, creche facilities etc. This would have a positive impact upon the local community by arresting the current decay and for this reason our proposal should be seen as appropriate development. Indeed, Government ministers regularly call for an appropriate

expansion of villages and hamlets to provide support for local services.

29. Halewood is currently over-developed and becoming like another Milton Keynes. In a small way, our proposal would help arrest the current sprawl from the main built up areas, but it would have little impact upon the Green Belt, because the site actually sits in the middle of a gap between two main built up areas. Its development will thus not actually threaten the merging of any settlements or any of the other five purposes of including land in Green Belt.
30. Elsewhere, as an example, nearby Hale village has benefited from appropriate development around its area without losing its character or identity.

PLANNING HISTORY

31. The buildings at Greensbridge Farm were converted into 8 dwellings in 2001 by the applicants, in a sympathetic manner and fully in accordance with all planning conditions. The farmhouse was also fully repaired and restored. The development is now an asset to the Borough, despite the vociferous objections from the immediate locality at the time and the initial reservations of some Planning Officers.
32. One of the applicants and members of his family live on the farm and therefore he would not seek inappropriate development nearby.
33. As mentioned earlier, an application for a horticultural nursery and fishing lake on the representation site was refused in 2006.

ENVIRONMENTAL ISSUES

34. Various previous consultations with the Environment Agency, as directed by Knowsley Metropolitan Borough Council, indicated no issues.
35. The agricultural land specification map indicates that no best and most versatile agricultural land is involved. Although there are small pockets of Grade 2, the land is mostly Grade 3B.
36. Two technical surveys carried out in 2006 indicate no issues regarding contamination, ground conditions for building or mining problems. There is no history of flooding.
37. Developing on a relatively small scale such as this will allow us to employ the latest technological advances to make it a green scheme, including the use of solar energy, high specification installation materials, recycling of grey water, etc.

HIGHWAY ISSUES

38. Traffic regularly exceeds the speed limit on Greensbridge Lane, so a roundabout at the entrance to the proposal (similar to the one at Tavington Road further down the lane) would help calm traffic speeds.

VISUAL AMENITY

39. With thoughtful approach, homes for people can be blended into the landscape. They need not become a disfigurement of it. There is a mature screen of trees along Ochre Brook on the north side of the site which can be managed and cultivated as a backdrop to any

development. A significant additional landscaping scheme, possibly in conjunction with the Mersey Forest Initiative, will further reduce the visual impact.

40. We are happy that the scheme can be overseen by a body such as the Wildlife Trust in order to maximise the opportunity to enhance the natural habitat.

CONCLUSION

41. We cannot go forward and create a new planning order unless we think differently. We must begin thinking in terms of community and embrace a change in approach from creating properties to creating communities. Property is the old fashioned way of thinking of development as an economic opportunity. Instead, we need to regard the land as a home of a living society with the community itself as the first priority.

42. The owners of the land see this proposal to be of direct benefit to their local community. Total flexibility over the type of build is offered, from affordable homes for key workers, to retirement bungalows, to executive homes for business leaders. This proposal will help shore up the crumbling infrastructure and support local facilities, yet provides a location convenient for local employment areas.

43. This is a sustainable, viable and achievable option for the Site Allocations and Development Policy DPD that fully supports the aims and aspirations of the Preferred Core Strategy.

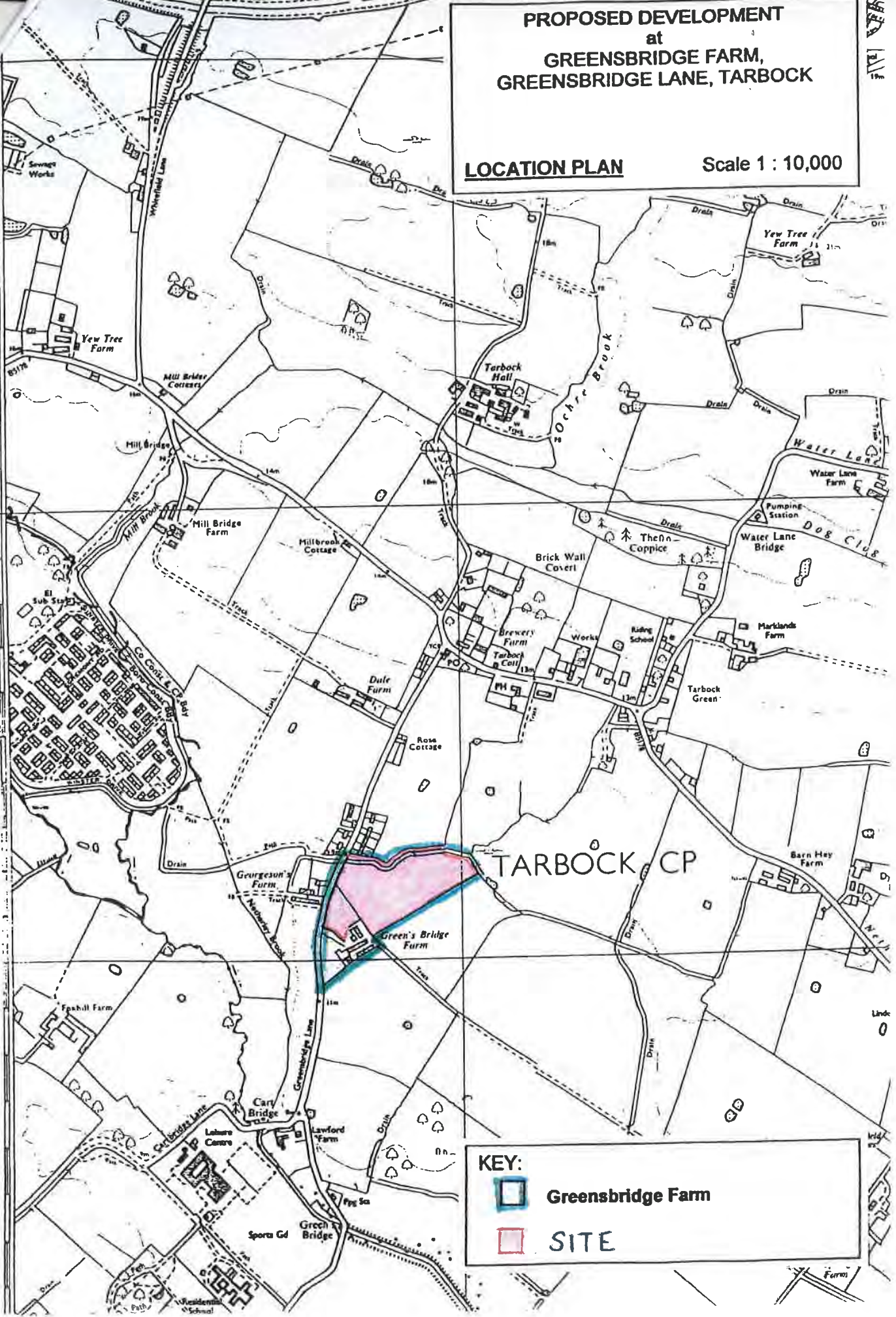
GLYN R BRIDGE
McDyre & Co
January 2012

**PROPOSED DEVELOPMENT
at
GREENSBRIDGE FARM,
GREENSBRIDGE LANE, TARBOCK**



LOCATION PLAN

Scale 1 : 10,000

LIVERPOOL
88
87



KEY:

-  Greensbridge Farm
-  SITE

THE EMERSON GROUP

EST. OVER 55 YEARS

Planning Department
E-mail: [REDACTED]

PLANNING DEPARTMENT

DAVID W SHORT BSc DipTP MRTPI
GRAHAM A BEE BSc DipTP MRTPI
MATTHEW DUGDALE BA MCD MRTPI
KERREN J PHILLIPS BSc
TOM LOOMES BA (Hons) DipTP MRTPI
ANGELA DC PENNY

[REDACTED]
Local Plan Team
Knowsley MBC
1st Floor Annexe
Municipal Buildings
Archway Road
Huyton
L36 9YU

Our ref: MD/Planning

14 November 2014

Dear [REDACTED]

RE: KNOWSLEY LOCAL PLAN CORE STRATEGY PROPOSED MODIFICATIONS, AUTUMN 2014 – CONSULTATION RESPONSE ON BEHALF OF ORBIT INVESTMENTS (PROPERTIES) LIMITED

I am writing to provide comments on behalf of Orbit Investments (Properties) Limited regarding the above, which are set out on the attached, completed Representations Forms.

Orbit Investments (Properties) Limited, part of The Emerson Group, owns Academy Business Park, as illustrated by the attached Estate Plan (389-SCH-1019). The site is situated at a prime "gateway" location fronting Knowsley Industrial Park. At 10.79 hectares in size, it provides a key opportunity to contribute to the local economy through the adaptation of existing buildings and creation of new build premises fit for modern business needs.

Orbit's view is that the Local Plan Core Strategy with the Proposed Modifications is largely sound, subject to the changes requested in the attached Representations Forms. These objections relate to the location of the proposed "Services Hub" in Policy CS11 and the viability of sustainable and low carbon development in Policy CS22.

I would be grateful if you could confirm receipt of the attached comments. Should you wish to discuss any of these points in further detail, please do not hesitate to contact me.

Yours sincerely,

[REDACTED]

Matthew Dugdale
Planner

Enc. Proposed Modifications Representations Forms (Autumn 2014)
Estate Plan (389-SCH-1019)

DIRECTORS: PE JONES OBE (CHAIRMAN) ME JONES (DEPUTY CHAIRMAN)
AE JONES AC WEATHERBY BA (Law) (SECRETARY) J EDWARDS BSc (Hons) FCMA CGMA (FINANCIAL)
SP WILSON JP BURGESS BA (Hons) Law MST ROYLE BA (Arch) JR CLABER BSc (Hons)
NON-EXECUTIVE DIRECTORS: AJ WHITE BEng A JONES THE LORD LEE OF TRAFFORD DL FCA JP ALLEN ACIB DipFS
EMERSON DEVELOPMENTS (HOLDINGS) LTD

REGISTERED OFFICE [REDACTED]

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

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

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

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

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

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title		Mr
Name		Matthew Dugdale
Job Title (if appropriate)		Planner
Organisation (if appropriate)	Orbit Investments (Properties) Limited	
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 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.

Orbit support the reference to Lees Road as a “gateway” location, as requested in comment #1105 (December 2012).

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

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

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

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

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

Signature



Date

14/11/2014

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 type="checkbox"/>	<input checked="" type="checkbox"/>

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

Orbit agree with the need for a Local Service Centre (or "Services Hub") at Knowsley Industrial Park. However, as previously stated in comment #1105 (December 2012), there is little justification for a local service centre to be located specifically at South Boundary Road. An application (11/00055/OUT) for mixed use development at the junction of South Boundary Road and Hornhouse Lane, including 1,115 sqm of commercial floorspace (use classes A1, A2, A3, A5 & D1), was refused by the Council 19th October 2011 for 3 reasons including: a detrimental impact on the viability and vitality of Kirkby Town Centre and loss of employment land without any regeneration benefit. As such, the policy as worded is not justified or effective.

Therefore, Orbit request that the location of the "Services Hub" be delegated to the Local Plan Site Allocations and Development Policies document, in order that full consideration can be given to suitability, availability and viability of sites. This is the approach taken by Policy CS6 (Town Centres and Retail Strategy) and reflective of NPPF paragraph 23, which should be mirrored by Policy CS11.1(d) in order to ensure consistency in approach across the Plan.

Academy Business Park, as identified on the attached Estate Plan (389-SCH-1019), could provide a suitable location for small scale shopping and services to serve the needs of the workforce. This would be a sustainable location which is highly visible, accessible and more sequentially preferable than the South Boundary Road site. In addition, the site currently benefits from implemented planning consents for a petrol filling station and drive-thru restaurant (04/00275/FUL & 04/00276/FUL), which are compatible uses to serve the needs of local businesses on the Park. The provision of such uses at the southern end of the site would not prejudice the wider redevelopment of the site for B8 warehousing and distribution.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make 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 text in Policy CS11.1(d) should be re-worded to remove specific reference to South Boundary Road and be replaced with a more generic location that can be defined by the Allocations and Development Policies document and Policies Map, as follows:

"d. A local service centre (or "Services Hub") at ~~South Boundary Road~~ A5208 County Road South/South Boundary Road/Moorgate Road/Arbour Lane/Lees Road, to provide small scale shopping and services to serve the needs of the workforce within the Park, will be defined on the Policies Map by the Local Plan Site Allocations and Development Policies document".

The last bullet point of paragraph 6.27 would also need amending accordingly.

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

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and 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

14/11/2014

PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

Orbit Investments (Properties) Limited

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

Modification Ref

M210

Policy Ref

CS22.5

Paragraph Ref

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

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

Orbit support the removal of part 5 of the policy relating to Sustainable Construction Targets.

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

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

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and 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 14/11/2014

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(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 checked="" type="checkbox"/>	<input 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.

Policy CS22 needs to include reference to the viability of delivery of sustainable and low carbon development.

Flexibility is required so that delivery of this policy does not make schemes unviable.

4. If you are objecting to the modification please set out how you consider it should be changed to make 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 stated in comment #1105 (December 2012), Orbit request that the words "and/or viability" be inserted after the words "subject to feasibility".

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

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

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

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Signature



Date 14/11/2014

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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 |
|---|-------------------------------------|--------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| j) 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.

Orbit support the removal of the last sentence from part 6 of the policy relating to the payment towards independent scrutiny of submitted viability evidence.

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

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

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and 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 14/11/2014

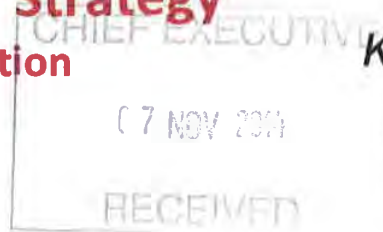


Knowsley Council

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	ROBERT JACKSON	
Job Title (if appropriate)	FARMER.	
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.

Flukers Brook Farm



6 November 2014

Dear Sir

I am writing with regards to the land in Knowsley Village which could be safeguarded for future development which according to your maps has not been chosen.

I have some points which I would like you to address.

1. Why is only Lord Derby's land safeguarded for future development?
As this keeps a green edge to the village.
2. If field numbers 1538 2972 3975 0985 were to be used for development this would cause less disruption for the residents of Knowsley Village.
And also it would make the Village Hall, Church and the Derby arms Pub more central to the village
3. Why should a small amount of people decide the future of the land around the village who probably are not residents?
4. Why have the local landowners not been consulted for their opinions before the UDP was published?
5. Where is the surface water going to go? What plans are in place for this?

I enclose two copies of correspondence referring to the UDP from my land agent from which you will see I did write to the council in the past.

Also enclosed is a map with my land outlined in red .

Yours faithfully



Robert Jackson

2.

17th November 2003

Mr. R.T. Jackson

We would propose that we send a letter to the council stating that we do not intend to submit any formal representations in respect of the U.D.P. but wish to point out that your land (which we will identify on a plan) is available and potentially suitable for housing and/or employment use and also for the relocation of recreational facilities etc. to free up other urban sites for development.

I look forward to hearing from you with your instructions. Representations to the U.D.P. have to be submitted by 8th December.

Yours sincerely,



P.A.E. JOHNSON
for Frank R. Marshall & Co.

R.T. JACKSON.



MARSHALL
CHARTERED SURVEYORS

Mr. R.T. Jackson,


Your ref:

Our ref: PAEJ/HD

Date: 30th November 2007

Dear Robert,

Re: Representations to Knowsley MBC re. Call for Sites

I confirm that I have submitted on your behalf forms for the council to consider two sites for potential development, one being the land at Church Farm and the other being the land between the motorway and Knowsley Lane.

I enclose herewith a fee account in respect of this matter.

Yours sincerely,


P.A.E. JOHNSON
for Frank R. Marshall & Co.
e-mail: 

Enc.

PROPERTY CONSULTANCY
VALUATION
LAND & ESTATE AGENCY
AUCTIONEERING
PLANNING & DEVELOPMENT
AGENTS FOR AMC plc

PARTNERS

Thomas R Rickard
FRICS, FAAV
Alan N Lane
FRICS, FAAV
Nicholas C D Marsh
FRICS, FAAV
Paul A E Johnson
BA, FRICS, FAAV
Roy L Brereton
FRICS
Peter J Ashburner
FRICS, FAAV
C Gwyn Williams
BSc, MRICS, FAAV

ASSOCIATES

James M G Woods
MRICS, FAAV
Roger Lee
FRICS
A. Roy Waller
J. Farrell
A. Partridge
N. Tomlinson

Financial Secretary
& Accountant
Roy Smith MBA MCM1

OFFICES

Knutsford
Buxton
Chelford
Northwich
Wigan
also
Knutsford
Auction
Salerooms
and
Chelford
Agricultural
Centre

Homer Wood

Pond

SJ4395
1583
● (3)
8.42

SJ4395
2972
● (4)
5.50

SJ4395
3975
● (5)
0.55

Darlen Cottage
Shepherd Cottage

Pinkfold Cottage

EIFOLD LANE

The Studio

Maden's Bow

Stables

SJ4394
0985
● (2)
7.94

Pond
Drain
Pond
Drain
Akers Pits
Drain
Pond

SJ4394
4579
● (6)
3.93

R.T. JACKSON

From: Tony Docherty [REDACTED]
Sent: 13 November 2014 15:51
To: [REDACTED]
Cc: John Baker
Subject: Representations in respect of Further Modifications to the Submission Document of the Knowsley Local Plan Core Strategy - Weston House
Attachments: Scan_20141113_154507.pdf; Weston House Reprs Doc..docx
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

I enclose here with the following documents in respect of the above, –

1. The Representations Form, and
2. The Representations Statement

Both are given in PDF format. The signed originals will follow in the post tonight.

Please confirm receipt of documents. Thank you.

Kind regards,

Tony

Tony Docherty

ATD
Specialties Limited

[REDACTED]
www.atdspecialties.co.uk

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

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

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

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

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

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	TONY DOCHERTY	
Job Title (if appropriate)	LANDOWNER	
Organisation (if appropriate)	n/a	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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

PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

PLEASE SEE ATTACHED REPRESENTATIONS STATEMENT

Continue on a separate sheet if necessary

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

PLEASE SEE ATTACHED REPRESENTATIONS STATEMENT

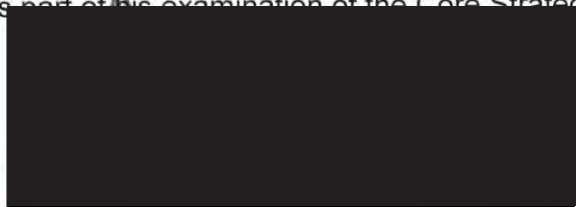
PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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

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

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

Signature



Date

12/11/14

Weston House

Representations in respect of the Proposed Further Modifications to the Submission Document of the Knowsley Local Plan: Core Strategy September by the Owners of Weston House Representation Reference 128/1220

This Statement is in response to the Further Proposed Modifications to the Submission Document of the Knowsley Local Plan: Core Strategy published in September 2014. The objections are shown sequentially in accordance with the Modification Reference shown in the document and call into question the rationale of the Council in determining the proposed modifications to the Submission Document as well as the implications of modifications to a Local Plan which, as far as Housing Provision during the Plan period is concerned, particularly in the first five years, we contend is fundamentally un-sound. The views expressed in this Statement are those of the Owners of Weston House.

Our Objections to the following Proposed Modifications are as follows: –

1. MO 12. Paragraph 1.2 8A

We contend that Planning Policy Guidance has not been strictly followed in the making of the Local Plan insofar as the acceptance by Knowsley that their housing number projections were substantially wrong, has meant that, in order to achieve the correct housing numbers, the Local Plan would have to be significantly altered. This, in turn, meant immediately abandoning the phasing mechanism for the release of Green Belt land which had been a mainstay of the original Plan, and as an expedient measure sanctioning the removal from Green Belt of substantial Parcels of Land without thoroughly and efficiently investigating how a significant portion of the housing number deficit could be achieved through the development of smaller Parcels of Land in the Green Belt in, including the land known as Weston House.

The Owners of Weston House had earlier informed Knowsley in the meeting which took place months before the Public Hearing commenced that, according to their Consultants, the housing numbers being projected by Knowsley were substantially inadequate. This was dismissed as being totally incorrect, and yet within the first week of the Hearing Knowsley had accepted the view of those attending the Hearing that their calculations were wrong and that they needed to not only re-calculate the housing number requirement, but make Modifications to the Plan which addressed the issue of how the new numbers could be achieved, and the only way to do this was to abandon completely the original Plan with regard to housing and create a new Plan. In our view expediency and time constraints resulted in not enough attention being paid to Planning Policy Guidance, or if attention was paid then it was simply ignored. This is not the proper way to develop and adopt a sound Local Plan.

2. MO15. Paragraph 1.36

Significant points were raised by us in relation to Planning Policy Guidance, the NPPF, and the important issue of the Green Belt, in that Consultation and the subsequent Representation but these

Representations in respect of Further Modifications to the Submission Document November 2014

appear to have simply been ignored. The views expressed by our Consultants were based on their own professional expertise, wide-ranging experience over many years including advising on the matter of urban fringe Green Belt, as well as attendance at many other Local Plan Examination Hearings, and yet these professional opinions and judgement appear to have counted for very little.

3. MO22. Paragraph 1.43

We contend that the Risks to the delivery of the Housing Trajectory Projections for the 15 year period have not been properly addressed. The relatively brief period of time in which the original phasing mechanism for the release of Green Belt has been completely abandoned, and justifiably so, has meant that there has simply not been enough time to give proper consideration to the effect on both Knowsley and Landowners/Developers of moving from 'famine' in the first five years to 'feast' in the same period, in terms of Development potential. All sorts of issues may arise - Landowner Intentions, Availability of funds for Development, the Business environment, Political issues, Infrastructure implications and costs, and of course, last but not least, the issue of Developer Contributions. The Housing Trajectory numbers in the first five years rely heavily on the SHLAA sites many of which have been available for years with Knowsley being unable to persuade Developers to take them on, and the new Sustainable Urban Extension sites, and in particular three very large sites. We are heading towards the end of the second year of the Plan period, and it does not take a great deal of imagination to envisage issues, problems, hold-ups, disputes on the part of both sides which are likely to ensure that the projected housing numbers for the first five years will not be achieved.

4. MO30. Paragraph 2.15

Following on from the above, we have in this paragraph a clear admission from Knowsley of their very poor historic record of Net Completions in the period 2002/3 to 2012/13 -an average of 189 per annum, and yet we are asked to believe that in the remaining three years of the first five-year part of the plan more than 1000 houses per annum will be constructed. That seems to us highly improbable, and, as a result we cannot understand the reluctance of Knowsley to include the smaller Additional Reserve sites, including Weston House which are available, in single ownership, and deliverable within a very short period of time. It appears to us that the main reason for this is the decision by the Inspector, in his Findings following the initial Hearing, that Knowsley did not need to consider such sites. This, in our view, appears to have been taken by Knowsley as a strict instruction rather than either an observation or a piece of advice. No explanation for the Inspector's Finding has ever been proffered by the Inspector to date, and therefore it has been impossible to present a cogent argument to Knowsley to gainsay the Inspector's decision. This is unreasonable and inequitable. Without a stated reason, it must be assumed that the Inspector believes that the combination of developable land for housing from the SHLAA sites and the SUE land parcels provide Knowsley with the potential to construct their target number of houses in the Plan period, and that therefore the inclusion of smaller sites like Weston Park is unnecessary. We believe that this opinion, if it is correct, does not take into account the significant difficulties which may be encountered during the Plan period in bringing the development of the SUE sites, particularly the three very large sites, to fruition. Nor does it take into account the fact that, currently, Knowsley do not have a five-year supply of land to achieve the housing numbers needed in this period. We take the view that the intention of Knowsley to make up any shortfall in this period, during the remainder of the Plan

period is facile and disingenuous, given the long history of poor completions referred to earlier. On this basis, we believe the Plan, as it stands is not sound, and that further review is required.

5. MO57. New Paragraph 5.2 0A

In the Local Plan and the Supporting Documents the desire to "Re-balance the Housing Market" in Knowsley, is frequently stated, and yet the emphasis is always on the provision of Affordable and Supported Housing. In our opinion, no emphasis is given in the Plan for the development of 'aspirational' properties for the upper end of the market to support Industrial and Business activity in areas like Halewood. It is important, if possible, to encourage the owners, executives, managers and senior personnel of the businesses which are based in Knowsley or close to it, to actually live in the area. To do that, Knowsley need to facilitate the building of appropriate houses, and yet one imagines that the great majority of the senior figures who make their living in Knowsley depart at night for the leafier parts of Cheshire or West Lancashire, in part, at least, because there are very few, if any, developments which might satisfy the needs of those individuals or their families in Knowsley. We believe that Knowsley lose out in this respect, and will continue to do so, because such developments help to raise the bar in terms of social and economic development, but if they do not exist or are not encouraged, then no benefit is gained. Knowsley were very happy to allow the development of the Everton Football Club Training Facility at Finch Park, and yet we have to ask ourselves how many of the very highly paid young men who attend there every day have ever considered buying a house in close proximity to Finch Farm? The simple reason for this is that there are no suitable properties, and so these individuals purchase their homes in the Wirral, Cheshire or in the Formby/Southport areas. The Weston House site, with its woodland setting, has been described by the major Developers who have visited the site and who are interested in it, as perfect for that type of development.

6. MO60. Knowsley Housing Trajectory.

We contend that the figures used are understated and that therefore the trajectory is incorrect. In a previous Representation made to the Re-convened Hearing July 2014, we estimated that the final five-year housing requirement was 3592, taking into account the backlog of 743 houses and the 20% Buffer required by the NPPF for Local Authorities with a consistent track record of poor completions. According to their own trajectory, Knowsley estimate that even if they remain on target during this first five-year period, which seems highly unlikely, they will construct approximately 2800 houses, a shortfall of 792 houses which means that the current backlog is, in effect, being carried forward by design into the second five-year phase of the Plan. This position appears to have been accepted by the Inspector. However the council cannot say, in our opinion, that it is impossible to deal with the requirement to deal with any backlog within the first five years of the Plan period, as required by the NPPF "**where possible**" (our emphasis) whilst refusing to consider the smaller Green Belt sites such as Weston House. Although it is currently in the Green Belt, the full analysis submitted by Weston House shows the site does **not** have a critical role in fulfilling the purpose of including land in the Green Belt and could be developed without any significant impact on the integrity of the Green Belt or its ability to perform the role for which national Green Belt policy was created. The Core Strategy is substantially changing the Green Belt extent and boundary, and is including for development many Green Belt sites which are, in some cases at least, clearly much more important to the Green

Belt purposes than Weston House. Western House meets all the tests shown in Paragraph 47 of the Framework for a site to be counted as part of the supply for the next five years.

7. MO76. Policy CS5 Clause 1

We contend that Knowsley pay deference to the NPPF (and to previous Planning Regulations and Guidance) when it suits, but appear happy to override the Framework and the previous Regulations also when it suits. For example, what were the "very special circumstances" that led to the granting of a Planning Permission in 2002 for the construction of six houses on land adjoining Weston House which is also in the Green Belt, and where the projected houses have still not been constructed, or for giving an 'In Principle' approval for the land in Bank Lane Kirby (well in advance of the site being designated as a SUE), and which we understand has now been converted to full Planning Permission? Where is the consistency, transparency and fairness with such decisions in comparison to the decision not to include smaller sites like Weston House in the Local Plan?

8. M168. New Chapter 6A Sustainable Urban Extensions

In principal, we support the creation of the Sustainable Urban Extensions, because once Knowsley had accepted that its housing numbers were substantially wrong, it became obvious that it could not rely upon the SHLAA sites alone, as it had intended, to deliver the housing numbers needed in the first five years of the Plan, and that as a result a change in strategy was needed, and this led to the creation of the concept of the SUE. There is nothing wrong with that, apart from the fact that Knowsley now appear to have adopted a doctrinal and doctrinaire approach to the selection of sites in the Green Belt for development over the Plan period, preferring to rely on larger (and in some cases extremely large) Parcels of land within the Green Belt, and have eschewed the possibility of achieving the required numbers by balancing any shortfalls from those larger sites with housing numbers on smaller sites, like Weston House which are readily available and deliverable within the first five-year period. There must be a very high expectation that some of the sites will not be developed in line with the trajectory the plan now contains, and for sure, Knowsley has not provided convincing evidence to support the view that the SUE sites are deliverable in total, and in these circumstances, we maintain that the Plan should take the opportunity presented to increase its flexibility and hence the confidence in the supply by adding further highly deliverable sites such as Weston House.

9. M243. Paragraph 10.19 Developer Contributions

We take the view that not enough detailed consideration has been given to such contributions, and the position which may arise if the developers are unable or unwilling to fund the level of contributions required by Knowsley. The only alternatives are that either Planning Permission would be refused or that the Authority will have to subsidise the development, neither of which are desirable. Part of the problem here arises from the fact that the SUE sites were not part of the original Plan, and their withdrawal from Green Belt came about as a result of the acceptance by Knowsley that their housing numbers were wrong, and that in order to comply with NPPF they would have to abandon the phasing mechanism in which these identified sites would be released from Greenbelt sometime in years 6-15 of the Plan. As a result, there has been little or no time for consultation with Developers on the matter of Developer Contributions. Setting out the types of Developer Contribution within the Plan is sensible, but getting Developers to agree such

Contributions to the level that Knowsley would like (and needs, given budget constraints) will be an entirely different matter. One can only imagine that very lengthy, convoluted and potentially acrimonious discussions and correspondence will flow between the Landowners, the Developers, and their respective Consultants and Knowsley. Reconciling the interests of individual Landowners/Developers alone, particular in respect of the larger sites, will be incredibly difficult, and this fact was clearly demonstrated at the Re-convened Hearing. Idealistically, Knowsley have settled on the idea of 'Master Planning' as the solution, which, at first glance, seems perfectly reasonable, but getting all of the different parties to agree to a Master Plan and to pay the required Developer Contribution share might prove to be a Herculean task.

At best, this will result in lengthy delays in the actual commencement of developments, particularly those on the three very large sites. At the very worst this position will inhibit the development of some of the SUE sites to the extent that it is likely that, once again, Knowsley will succeed in having a much lower level of completions than the Plan requires. It is acknowledged that even by including all of the smaller sites this position may not be entirely resolved satisfactorily, but it will be mitigated to some extent. Whereas, excluding the smaller sites completely, at least until there is a Review at the end of the five-year period at the earliest, means that Knowsley have denied themselves the additional flexibility that may be needed during the Plan period. This appears to be the triumph of rigid Planning policy over sound common sense and intelligent pragmatism.

10. Policy of KLCPS. SUE 1 (Page 102)

We question the validity of this Policy with regard to the Master Planning proposal, something not considered in the original Plan, and for which Knowsley ought to have addressed through their own Master Plan on this subject, and issued a Technical Document prior to the original Hearing. However because the housing numbers were wrong, and Green Belt land was not going to be released in the first five-year period, no real or detailed thinking has gone into this process, and this was evident from the comments and the disagreements which were voiced at the Re-convened hearing.

The term 'Development Management Process' which has a technically authoritative ring about it, has been used in this Policy by Knowsley, but there are no clear guidelines as to what this means exactly in the context of the SUE Sites. We have to question whether Knowsley have the resources and skills available for this type of complex process, and whether budgetary constraints will allow them to buy in those skills and expertise, if they do not.

We also take the view that the Key Risks shown have been substantially understated and should include:

- Infrastructure difficulties and delays (United Utilities made reference to this in a previous Representation when commenting on and welcoming the decision of Knowsley to consider the development of land owned by Utility Companies)
- The unwillingness of Landowners/Developers to meet the expectations of Knowsley with regard to Developer Contributions
- The implications flowing from this in terms of subsequent delays, financial restrictions (on both sides) and failure to deliver the required housing.

Furthermore, we fail to see how 'Clarification that areas falling outside the SUE's remain in the Green Belt and are subject to Policy CS5' mitigates the Risks to the Policy. In our opinion, such an inflexible approach actually exacerbates the Risks to the Policy, unless, of course, one views the Policy as sacrosanct in itself, rather than acknowledge the reason why the Policy was created, which was to ensure that the required number of houses for the Plan period are delivered.

This is yet another indication that there is an unshakeable conviction on the part of Knowsley that all of the SUE sites will be developed without difficulty or delay and in full during the Plan Period, which we believe is unrealistic, and that there is no need for some degree of flexibility to take into account the potential for a margin of error to upset the Plan. Any worthwhile Master Plan would always assume that things will not always go according to plan, for whatever reason, and that this should be taken into account by the Plan and be allowed for or budgeted for by the Planners. If Knowsley believe that the SUE sites will be fully deliverable without any difficulty or delay, then why identify the Key Risks to the Policy which have been shown, and which, as we have said, are incomplete anyway. To this extent we believe that Policy SUE 1 is flawed, and as it stands the Plan is therefore not sound.

11. Policy of KLCPS. CS27. Planning and Paying for New Infrastructure(Page 120)

The scale of development arising from the SUE sites and the enormous Infrastructure requirements for those sites, particularly the 3 largest SUE sites call into question the validity of Knowsley's Infrastructure Delivery Plan (M I 115) largely because of the very short timeframe which Knowsley have had in which to prepare and/or modify the IDP. Some of these developments are major projects which take a long time to plan and prepare for, and involve, not just the Authority's own technical staff, but those of the relevant Utility and Service Companies. One has to ask just how much real planning has gone into this Policy, and to question whether proper consideration has been given by Knowsley to the Key Risks which have been identified by the Authority, and to pour scorn on the Mitigation Factors presented by the Authority, which loosely translate into 'if problems arise we will be flexible in our resolution of them, and/or if the Plan is not working as we would like it to them we will change it'. In Risk Management terms these would not be considered mitigation of risk: they are simply statements which make it clear that the IDP has not been properly and carefully thought through.

Of course, the biggest risk to the IDP will be the refusal of Landowners/Developers to pay for new Infrastructure developments to the extent that Knowsley will want them to, and there is then the potential for the Authority to be held to ransom by either refusing to grant Planning Permission for all or part of these sites, in which case there will be a serious shortfall in housing numbers for the Plan period, or alternatively for the Authority to have to bear a much larger portion of the Infrastructure Development Costs than it would like or can afford. Again, if the latter is the case, then the development will not take place, and there may be a significant shortfall in housing numbers for the Plan period, as a result.

**OUR PROPOSALS TO MAKE THE PROPOSED MODIFICATIONS REFERRED TO ABOVE
CONSIDERED SOUND ARE: –**

1. MO 12. Paragraph 1.2 8A

Comply strictly with Planning Policy Guidance in terms of dealing with the Housing backlog during the first 5 Year period of the Plan, and utilise the smaller Green Belt sites to enable that to happen.

2. MO15. Paragraph 1.36

Reconsider the points which have been made by our Consultants in previous Representations, and take them on board.

3. MO22. Paragraph 1.43

Review the Risks to the Housing Trajectory Projections and mitigate those Risks by inclusion of the smaller sites like Weston House which are available for development.

4. MO30. Paragraph 2.15

Override the view of the Inspector that the smaller Green Belt sites are not needed for the 15 year Plan, and allow them to be brought into the Plan in order to give it a greater degree of flexibility and to increase the confidence in the Plan with regard to its soundness.

5. MO57. New Paragraph 5.2 0A

Re-assess the meaning of 'Rebalancing the Housing Market' so that it is not completely tilted towards Affordable and Supported Housing, but, instead, also welcomes the sort of housing which is at the other end of the scale and which is important to upgrade the character of the Borough.

6. MO60. Knowsley Housing Trajectory.

Revise the Housing Trajectory figures to show numbers which include the Housing Backlog and the 20% Buffer, and review strategy to allow the inclusion of the smaller Green Belt Sites including Weston House so that this shortfall can be dealt with in accordance with NPPF requirements.

7. MO76. Policy CS5 Clause 1

Either comply fully with NPPF and NPPG or demonstrate an even-handed approach to all Landowners with sites in the Green Belt who would like those sites to be developed.

8. M168. New Chapter 6A Sustainable Urban Extensions

Extend the number of SUE sites to include the smaller Green Belt sites which have been excluded, including Weston House in order to provide a greater degree of flexibility in the Plan to offset inevitable shortfalls which will arise during the Plan period.

9. M243. Paragraph 10.19 Developer Contributions

Recognise and accept that Developer Contributions will be a significant issue and will either create development delays or prevent development happening, and that, as result, greater flexibility in terms of sites to be developed is required, and this implies including smaller Green Belt sites such as Weston House.

10. Policy of KLCPS. SUE 1 (Page 102)

Re-state the Key Risks to this Policy to include those shown above, and modify the Mitigations to the Key Risks to exclude the idea of ensuring that other sites in the Green Belt remain available for development.

11. Policy of KLCPS. CS27. Planning and Paying for New Infrastructure .

Review the Infrastructure Development Plan to acknowledge and to take into account the fact that Planning and Paying for the required new Infrastructure for the major developments which will take place over the next 5/10 years will be a far more arduous and complex task than this Policy and the Plan indicates, particularly with regard to the issue and level of Developer Contributions. This review should be undertaken urgently, and results of the review should be taken into account with regard to other Policies and the Core Strategy itself.

28 POLICY CS15

Representations Relating to Policy CS15: Delivering Affordable Housing

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS15 001	1	171	Carol Blakeborough
POLICY CS15 002	1	108	Chris Edge, Barton Willmore for Junction Property Ltd
POLICY CS15 003	1	15	George MacKenzie, Halewood Town Council
POLICY CS15 004	1	266	Heather Weightman, Knowsley Town Council
POLICY CS15 005	1	279	Irene Davis (3)
POLICY CS15 006	1	464	Paul Williams
POLICY CS15 007	1	96	Ray Davis (1)
POLICY CS15 008	2	517	Sarah-Jane Jarman
		554	Trevor Jarman
POLICY CS15 009	1	119	Sian Butt, Pegasus for Taylor Wimpey
POLICY CS15 010	1	547	Thomas Gouldson
POLICY CS15 011	1	568	Yvonne Owens
Total	12		

[REDACTED]

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

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

Dear Madam/Sir,

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

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

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

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

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

Best wishes,
Carol Blakeborough

[REDACTED]

From: Chris Edge [REDACTED]
Sent: 14 November 2014 08:34
To: Knowsley Local Plan
Subject: Knowsley Local Plan Core Strategy and SPD: Representations on Behalf of Junction Property Limited
Attachments: CS Mods Response Form.pdf; SUE Consultation- 20 10 14.pdf; Counsel's Opinion-Policy SUE2-Nov 2014.pdf; Reps -Proposed Mods-Final- 07 11 14.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

Please find attached representations on behalf Junction Property Limited (JPL) to the following consultation documents:

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

Please acknowledge receipt of this email and the attachments in due course.

Kind Regards,

Chris Edge
Associate

Planning . Design . Delivery
bartonwillmore.co.uk



Please consider the environment before printing this email



We are exhibiting at the Farm Business Innovation Show 2014!
Find more information on our stand and seminar [here](#)

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Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

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

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

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

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

PART A – PERSONAL DETAILS

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

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

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

PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

Continue on a separate sheet if necessary...

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

Continue on a separate sheet if necessary...

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

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

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

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

Signature

Date

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

ADVICE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MARTIN CARTER
20th October 2014.

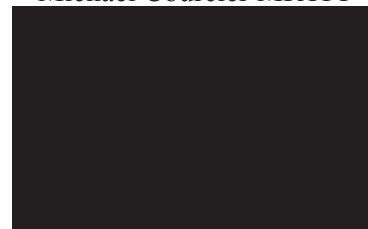
Kings Chambers
Manchester – Leeds – Birmingham.

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

RE: THE KNOWSLEY CORE
STRATEGY AND POLICY SUE2

ADVICE

Michael Courcier MRTPI



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

1 Supporting Representations

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

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

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

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

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

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

2 Representations Objecting to Specific Proposed Modifications

2.1 M168: New Chapter 6A on Sustainable Urban Extensions

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

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

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

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

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

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

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

2.2 M169 and M190: Policy CS 15 on Affordable Housing

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[REDACTED]

From: xMackenzie, George
Sent: 13 November 2014 12:47
To: [REDACTED]
Subject: LOCAL PLAN CONSULTATION RESPONSE

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Jonathan

Further to previous emails, please accept the following as Halewood Town Council's formal response to the current consultation...

'Having considered the proposed Sustainable Urban Extension – East of Halewood, and within the possible development of a local Neighbourhood Plan, Halewood Town Council have resolved that the site of the former Bridgefield Forum should be developed first, (i.e. before any development on the proposed land East of Halewood), and that an affordable housing target of 25% be applied to any development which takes place.'

Kind regards

George MacKenzie
Town Manager

Halewood Town Council

[REDACTED]

[REDACTED]

[REDACTED]

KNOWSLEY TOWN COUNCIL

RESPONSE

**MODIFICATIONS TO LOCAL PLAN
RELEASE OF GREEN BELT LAND**

Knowsley Metropolitan Borough Council's proposed modifications to the Local Plan regarding the early release of green belt land within the borough of Knowsley was considered by Knowsley Town Council on 27 October 2014.

Following consideration, Knowsley Town Council **UNANIMOUSLY RESOLVED** that it is totally opposed to the early release of green belt land for the following reasons:

- It would have a detrimental effect on the social infrastructure, especially in Knowsley Village. Any future development would have a negative impact on transport and public amenities.
- Knowsley Town Council believes there are sufficient brownfield sites within Knowsley to accommodate future development.
- Knowsley Town Council is totally opposed to the reduction in affordable housing target from 25% to 10%.
- Part of the parcel of green belt land in Knowsley Village, identified for release within the plan contains an area of designated public open space, leased by Knowsley Town Council, therefore this area cannot be used for future development.
- Knowsley Town Council believes that the proposed modifications of the Local Plan may compromise Knowsley Metropolitan Borough Council's flood risk assessment.
- Knowsley Town Council believes that the early release of green belt land for development contained within Knowsley Metropolitan Borough Council's Local Plan contravenes the National Planning Policy Framework on protecting green belt land, as follows:

Paragraph 83: Local authorities with green belts in their area should establish green belt boundaries in their Local Plans. Once established, green belt boundaries should only be altered in exceptional circumstances having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Knowsley Town Council feels that the reason for the early release of green belt land in Knowsley is not an exceptional circumstance.

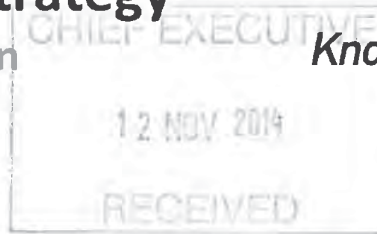
Paragraph 89: Local planning authorities should regard the construction of new buildings as inappropriate in green belt boundaries. Knowsley Town Council feels that any future development, especially in Knowsley Village, would be inappropriate as it would impact on the historic character and outstanding natural beauty of 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
- 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	Mrs Irene Davls MRS IRENE DAVLS	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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

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.

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

SEE COMMENTS IN RED.

Continue on a separate sheet if necessary...

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

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

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature



Date

25/10/14

KNOWSLEY LOCAL PLAN: CORE STRATEGY

Submission and Objections regarding proposed modifications

P R Davis
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

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

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

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

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

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

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

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

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

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

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

Proposed Modifications to the Submission Local Plan

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

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

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

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

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

“Councils must protect our precious green belt land”

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

KGBS 14 - South of Whiston

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

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

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

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

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

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

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

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

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

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

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

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

CS5 - Green Belt

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

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

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

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

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

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

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

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

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

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

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

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

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

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

CS14: Principal Regeneration Area – Prescott Town Centre

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

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

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

Not proved

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

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

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

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

CS21: Green spaces and Trees

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

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

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

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

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

CS22: Sustainable and Low Carbon Development

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

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

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

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



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

CHIEF EXECUTIVE
12 NOV 2014
RECEIVED

Knowsley Council

RETURNING THIS FORM

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

- By email: LocalPlan@knowsley.gov.uk
- 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 WILLIAMS	
Job Title (if appropriate)	PLASTERER	
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

Paul Williams

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

Modification Ref

WHIRSTON
South

Policy Ref

KGBS14

Paragraph Ref

S1 TO S8
E1 TO 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 OBJECT FOR THE REASONS OF POOR TRAFFIC FLOW IN WHIRSTON VILLAGE ALREADY. IT IS HARD ENOUGH TRYING TO GET DOCTOR'S APPOINTMENTS AS IT IS. HOSPITAL WAITING TIMES ARE ALREADY TOO LONG. I ALSO DON'T THINK IT WILL BE AFFORDABLE HOUSING FOR THE LOCAL COMMUNITY THERE IS NOT ENOUGH LEISURE FACILITIES FOR WHIRSTON PRESENT ALL DUE TO KNOWSLEY COUNCIL

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 area in question could be turned into nature walks for the Present Community

Continue on a separate sheet if necessary...

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

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

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

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

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

Signature



Date

1st 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
- 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

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

Modification Ref Policy Ref Paragraph Ref

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

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

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

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CS1 to 5, AD51 and the SUE documents are out of step with Public opinion, I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill. I consider the council have not utilised empty properties and brown field sites in its calculations of housing needs. The council have not considered infrastructure improvements to cope with the influx of people.

Paras:

3.2to3.24, 3.26,4.10,5.44to5.51,5.82to5.86,5.133to5.138,5.156,5.157,5.159,5.177,5.179,5.181,5.183,5.184

See attached sheets

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

Carry out an up to date housing requirement survey taking into account the latest figures from the Office of National Statistics, 2014.

Carry out a relevant up to date Traffic Management survey, taking into account the existing loads at peak times and the additional loads placed upon the area with an influx of at least 3000 additional vehicles.

Consider the impact on local services such as Doctor, Dentist, Schools, etc.

Insist that empty properties and brown field sites are developed before considering Green Belt release, and used to satisfy the 5 year plan. Brown field sites may well have the infrastructure already in place to cope with additional housing.

Put back any Green Belt release until end of plan period, and even then consider all other areas, green belt release should be the last resort, not the first action


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

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

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

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

Signature



ate 03/11/2014

KNOWSLEY LOCAL PLAN: CORE STRATEGY

Submission and Objections regarding proposed modifications

Ray Davis
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

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

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

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

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

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

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

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

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

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

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

Proposed Modifications to the Submission Local Plan

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

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

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

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

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

“Councils must protect our precious green belt land”

From: Department for Communities and Local Government, Brandon Lewis MP and The Rt Hon Eric Pickles MP

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

KGBS 14 - South of Whiston

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

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

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

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

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

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

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

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

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

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

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

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

CS5 - Green Belt

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

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

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

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

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

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

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

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

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

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

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

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

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

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

CS14: Principal Regeneration Area – Prescot Town Centre

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

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

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

Not proved

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

Not proved. Agrees with earlier points that state the policy 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 21st century, particularly as we all face the prospect of climate change. The demand on energy, water and other resources is likely to be much higher.

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

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



Knowsley Council

Knowsley Local Plan: Core Strategy

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

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	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



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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		████████████████████k
Preferred Method of Contact		Email

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref 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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Signature:



Date 13-11-14

expedient in terms of controlling the release of Green Belt land and minimising the delay in achieving adoption of the Core Strategy.

In accordance with the above modifications, the Council have included map extracts within the Proposed Modifications to the Policies Map document (CS10). TW support the modifications made and in particular support the addition of Map Extract 4 and the identification of the Edenhurst Avenue site for an SUE for residential removal including its removal from the Green Belt.

With regards to the Spatial Strategy for Knowsley (Policy CS1) and the Green Belt (Policy CS5), TW support the amendment to clause 'e' in Policy CS1 and the release of the SUE sites from the Green Belt at adoption in order to meet housing need and ensure an adequate supply of housing land and the amendment of clause 4 within Policy CS5 which confirms that a number of locations will be removed from the Green Belt to accommodate development needs. We also support the amendment made at paragraph 6.8 which reaffirms that the SUEs will be required to meet immediate development needs and as well as long term needs.

Housing Delivery

With regards to the Council's 5 year land supply, we note that within the Inspector's Second Interim Findings (EX34), he has considered the Council's schedule of further modifications (CS08b) and the Council's revised approach to the calculation of a 5 year housing land supply and confirms he now finds this sound. The inclusion and allocation of the SUEs was justified through the examination process as it was confirmed that the Council were unable to demonstrate a 5 year land supply of deliverable housing sites as there were serious viability constraints with a number of the sites within the existing urban area.

We note and support the amendment made to paragraph 5.6 which states that the sites which have been removed from the Green Belt will help to ensure an adequate supply of land for housing and employment development. We also note the addition made to paragraph 5.23 which confirms the Council will review Policy CS3 (Housing Supply, Delivery and Distribution) when appropriate if there is an under-delivery of housing against the plan period target.

Policy CS3 provides further detail on the supply and phasing of land for new housing development, clause 3 confirms that land will be identified to ensure a five year supply of deliverable sites is maintained at all times and land within the SUEs will be released to subject to the requirements of Policies CS5 and SUE1 to SUE2c.

With regards to affordable housing, Policy CS15 (Delivering Affordable Housing) TW support the amendment made to clause 1 which reduces the provision of affordable housing sought within the urban area to 10%. It is accepted that there is generally a higher level of development viability in the proposed SUEs and therefore a higher rate of 25% affordable housing is generally acceptable within the SUEs. Taylor Wimpey also support recognition that viability will also be a key consideration for any individual case as set out at paragraph 7.6. We note the recommended tenure split stated in paragraph 7.8 however, TW consider that the existing housing mix in the area should be considered when assessing the amount and tenure of affordable housing in order to assist in creating mixed communities. A number of the proposed SUEs are adjacent to areas dominated by social rented properties and therefore in some instances it may be preferential for a development to provide a higher level of private, low cost for sale units to balance the housing

market. We note the Council's commitment to rebalancing the housing market is endorsed at paragraph 7.9.

Inclusion of Sustainable Urban Extensions

Taylor Wimpey support the addition of Chapter 6A regarding SUEs and safeguarded land, in particular the inclusion of Edenhurst Avenue as an SUE within Policy SUE1. It is noted within the Inspector's second interim findings (EX34) that the Council's identification of SUEs and the removal of the phasing mechanism as stated within the Submission Document Incorporating Proposed Modifications (CS09) is now sound. It is noted and supported at paragraph 6A.16 that the SUEs will be released from the Green Belt and allocated on adoption of the Plan.

The 86 dwellings suggested by the Council on the allocation profiles within Appendix E is based on development just within Flood Zone 1. It should be noted that as part of any planning application a full Flood Risk Assessment would be carried out and therefore it may be possible that the site would be able to accommodate a greater number of dwellings than the figure proposed by the Council. We support the lack of a cap on the development capacity of the sites, indeed initial assessments carried out by TW indicate the developable area can be increased after mitigating flood risk which can be assessed at the application stage.

Conclusions

This letter has reaffirmed Taylor Wimpey's support for the identification of Edenhurst Avenue as a Sustainable Urban Extension. We note the Inspector has considered a number of the proposed modifications and finds a number of the above sound (EX34). TW share the Inspector's view on the Council's amendments relating to the context of this letter.

We trust these representations are clear and outline our support for the Proposed Modifications to the Core Strategy and the examination process as a whole.

Should you have any questions regarding the above, please do not hesitate to contact me.

Yours sincerely



Sebastian Tibenham

Planning Director



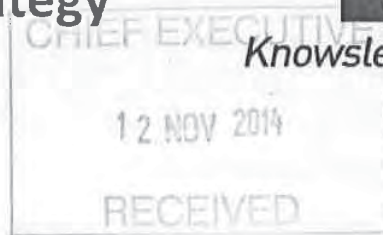
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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	THOMAS GOULDEN	
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"/> |

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I OBJECT TO ANY PLANS TO OUR GREEN BELT BECAUSE I FEEL THIS WILL BE A BIG MISTAKE TO THINK EVERYONE WILL AFFORD A HOUSE OR FLAT THE COUNCIL ARE NOT THINKING ABOUT THE FUTURE THEY WILL BE LEFT WITH A BIGGER BILL TO ISSUE OUT TO THE RESIDENTS WHO CANT AFFORD TO PAY RENT OR BUY.

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

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Signature



Date

1/9/14

RESPONSE DICTATED
TO G. WILDGOOSE
IN OSS RECEPTION
ON 13/11/14 DUE
TO INABILITY TO
COMPLETE FORM AS A
RESULT OF VISUAL
IMPAIRMENT

13/11/14

Core Strategy

consultation



Knowsley Council

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

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

Modification Ref

M168

Policy Ref

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 pavement 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

13/11/19

29 POLICY CS17

Representations Relating to Policy CS17: Housing Sizes and Design Standards

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS17 001	1	295	Jane Aspinall, Bellway Homes
Total	1		

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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	

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PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

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

Modification Ref

M001 etc.

Policy Ref

Paragraph Ref

1.3 etc.

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

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

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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...

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Signature



Date 13 November 2014

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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
c) Legally Compliant? (see guidance note 2.2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Sound? (see guidance note 2.3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

We support the identification and allocation of the Sustainable Urban Extensions in Policy CS1 including the last East of Halewood which is required to meet identified needs for housing.

Continue on a separate sheet if necessary...

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

Continue on a separate sheet if necessary...

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

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

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

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

Signature



Date 13 November 2014

PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

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

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

Signature



Date 13 November 2014

PART B – YOUR REPRESENTATIONS

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

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

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

Modification Ref

M078

Policy Ref

CS5

Paragraph Ref

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

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

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

This modification seeks to insert wording which is not in itself a “policy” and provides information. This text should be included in the supporting justification and is not necessary within the body of the policy.

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

Continue on a separate sheet if necessary...

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

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

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

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

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M133 etc.

Policy Ref

Paragraph Ref

6.5 etc

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the provision of clarification that the area priorities will apply to the Sustainable Urban Extensions in M133 and M166. However, as Policy CS5 is effectively a relatively standard Green Belt policy it is unclear why the reference to this policy is retained as the review is no longer (due to modifications to that policy) “in accordance” is incorrect and the policy does not now on its own seek to meet development needs (it is a policy of constraint).

We support the modification of the Halewood Map (6.4) as proposed by M167.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M168 etc

Policy Ref

Paragraph Ref

N/A

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| k) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| l) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the amendments that are proposed through M168 which proposes the inclusion of an additional chapter to address the proposed Sustainable Urban Extensions.

We support the proposed wording of Policy SUE1 and the recognition that these sites are meeting needs during the current plan period and beyond and the implementation of the associated changes to the Green belt boundaries. We specifically support the inclusion of the East of Halewood site (criterion 1(g)) for a residential led development. Criterion 4 should be amended as it refers to “guidance” in policies SUE2 and SUE2a to 2c but this is policy and not guidance. Criterion 5 may not be necessary as by reference to the Policies Map and Policy CS5 it is apparent that this is a matter of fact rather than policy.

In terms of Policy SUE2, whilst we support the Policy in principle, the degree to which it adds value rather than simply repeats other policies is however unclear. It is apparent in terms of the detailed criteria that:

- 1(a) repeats Policy SD1
- 1(b) requires a comprehensive approach but this could be included within SUE1 and repeats Policy CS27
- 1(c) repeats Policy CS19
- 1(d) repeats Policy CS2

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- 1(e) repeats Policy SUE1
- 1(f) repeats Policy CS8 and CS21
- 1(g) repeats Policy CS7
- 1(h) repeats Policy CS20
- 1(i) repeats Policy CS24
- 2) makes reference to “indicative considerations” which are not in themselves policy and therefore this could be in the supporting text.
- 3) simply confirms the council will prepare SPD for certain sites which again is not in itself a policy and just is a statement of intent.
- 4) provides more detail on 1(b) as outlined above but this could be reasonably incorporated within Policy SUE1.

On this basis it is considered that a large part of this policy could be omitted or included within the supporting text, and that those parts which cannot, can be readily and more appropriately incorporated within Policy SUE1.

Policy SUE2b applies specifically to the land East of Halewood and is broadly supported, subject to the comments on SUE2 and associated references, and the matters below. It is known that part of the site is constrained by flooding but the degree to which this impacts upon the capacity of the site is not precisely known. It is considered that the site could readily accommodate 1200 to 1300 dwellings and that evidence has previously been submitted to the Inspector (see the Development Statement for this site (Examination Document RH26a).

Continued...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014

It is therefore considered that the yield from this site should be identified to be **at least** 1200 dwellings rather than “approximately 1100 dwellings”. There is no evidence that indicates that this higher requirement cannot be achieved and indeed past masterplanning work has indicated that even taking into account the open space and flood mitigation requirements, a significantly higher yield can be achieved.

In addition to the proposed residential development it is considered that other uses may be appropriate on the southern portion of the site between Higher Road and the railway line to the south. The policy should be amended to make provision for the fact that some non-residential uses may be appropriate on the site. This would allow the SPD to provide guidance on what these may be and the circumstances in which they may be acceptable.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
m) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input type="checkbox"/>
n) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the deletion of the requirement to achieve the Code for Sustainable Homes, BREEAM and decentralised renewable and low carbon energy systems (see also M183, M208, M209, M210, M212, M215, and M217) and the removal of the requirement to achieve Building for Life and Lifetime Homes. We do not consider that those requirements could be justified and could adversely affect the deliverability and viability of new development.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

m) No, I do not want to participate at any further public hearing

n) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 13 November 2014

30. POLICY CS20

Representations relating to Policy CS20: Managing the Borough's Historic Environment

Reference	Copies Submitted	Submitted by:	
		Representor ID	Names
POLICY CS20 001	1	237	Emily Hrycan
Total	1		



ENGLISH HERITAGE

NORTH WEST

Local Plan Team
Knowsley MBC
1st Floor Annexe
Municipal Buildings
Archway Road
Liverpool L36 9YU

Our Ref: 1486
Your Ref:
Date: 3rd November
14

Email: localplan@knowsley.gov.uk

Dear Sirs,

Modifications to the Knowsley Local Plan: Core Strategy

Thank you for consulting English Heritage on the above document.

Ref M193 (PM52) Policy CS20 clause 1b

English Heritage strongly opposes the modification suggested.

The NPPF requires that Local Plans should include policies that conserve and enhance the historic environment. In terms of proposals, any development should be expected to both conserve and enhance the significance of heritage assets including their setting. The proposed change removes the need for proposals to have regard to setting. This weakens the degree of protection given to heritage assets in the Plan and would not comply with the approach of the NPPF, which recognises that the significance of heritage assets can be harmed through alteration or destruction of the asset or development within its setting (Para 132). The proposed change is also contrary to the 1990 Act as there is a requirement that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

It is suggested that the modification put forward be amended as follows to retain reference to “setting”:

“Prevent demolition and/or development which would result in substantial harm to or the loss of ~~designated historic~~ heritage assets and their setting”.

Ref M194 (PM53) Policy CS20 new clause 1bA

English Heritage strongly opposes the modification suggested.

www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available



The NPPF requires that Local Plans should include policies that conserve and enhance the historic environment. In terms of proposals, any development should be expected to both conserve and enhance the significance of heritage assets including their setting. The proposed change excludes the requirement for proposals to have regard to setting. This weakens the degree of protection given to heritage assets in the Plan and would not comply with the approach of the NPPF, which recognises that the significance of heritage assets can be harmed through alteration or destruction of the asset or development within its setting (Para 132). The proposal is also contrary to the 1990 Act as there is a requirement that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

It is suggested that the modification put forward be amended as follows to include reference to “setting”:

“Where a development proposal will result in less than substantial harm to a **designated** heritage asset **and its setting**,”



If you have any queries about any of this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,



Emily Hrycan
Historic Environment Planning Adviser (North West)
English Heritage





www.english-heritage.org.uk
Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available



31 POLICY CS21

Representations relating to Policy CS21: Greenspaces and Trees

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS21 001	1	359	Keith Woodling
Total	1		



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
- 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 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.*

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 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

11/11/14

PART B 4– YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
g) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to the area south of M62. The proposed September modifications took the emphasis off investment in existing locations and placed it firmly on the 'new'. This indicates that Knowsley have little or no appetite to fill the empty space in Huyton Business park and empty units on nearby Fallows Way.

A ten minute drive round Huyton Business Park will show how much unused land or empty unit/buildings are available. The occupancy level is one area where there are inaccuracies in the supporting documentation.

The area south of M62 doesn't need more employment locations, it just needs the existing areas to realise their full potential. Proper effective management would achieve this whilst allowing other Core Objectives to be met.

Clearly the site has potential, as recently a developer acquired a large site for redevelopment.

For Fallows way, it is believed that two of the three units are un occupied at present. If the remaining occupant could be encouraged to relocate to Huyton Business Park, the whole of Fallows Way could be given over to housing. Reducing further the need to use Green Belt land. This would have the added benefit of reducing the number of large lorries that use Windy Harbour Road daily and hence congestion.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy** and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11 / 11 / 14

PART B5 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to KGBS14 South Whiston, there is very little mention of provision for new local centre, expansion or regeneration of existing local shops

As for 6.45, the policy is flawed and mostly irrelevant. This highlights lack of understanding of local issues. In turn this suggests that Knowsley have taken a 'one-solution-fits-all' approach. This element of the core strategy cannot be met.

Little mention is made of requirement for additional facilities such as health care or clinic, GP surgeries and dentist. Nursery and school requirements are also not described.

No reference was found to alternative policy documents that would detail these requirements, which suggests that no additional pre-school or school facilities are planned to meet huge increase in demand for services from such a large housing development. Similarly no additional health care provision. A number of strategic objectives will not be met

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

12/11/14

PART B6 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| k) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| l) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With reference to KGBS14 South Whiston area.

Improvements to existing rail network, enhancements to stations.

As a regular train user from Whiston Station, Network Rail have been observed undertaking a passenger survey. This is with a view to CLOSE Whiston station. How does that help meet the transport policy? Clauses 1a, 1c, 2b, 3b, 3e

Also, and contrary to supporting documents, bus routes and times have been revised to the effect of after evening rush hour a minimal number buses are running. This will prevent a number of clauses from being met.

This removes choice, a key policy objective.

In reality this will manifest itself as people making greater use of personal car or cars. This will further bring the transport policy into disarray and have a negative impact on other perceived benefits & strategic policies

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

32 POLICY CS22

Representations Relating to Policy CS22: Sustainable and Low Carbon Development

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS22 001	1	205	David Holmes (5)
POLICY CS22 002	1	279	Irene Davis (3)
POLICY CS22 003	1	292	James O'Rourke
POLICY CS22 004	1	113	Jenny Hope, United Utilities
POLICY CS22 005	4	364	Kirsty Meredith
		444	Nicola Meredith
		468	Paula Meredith
		94	T W Bretherton
POLICY CS22 006	1	105	Matthew Dugdale, Emerson for Orbit
POLICY CS22 007	1	454	Patricia McDonald-Holmes (4)
POLICY CS22 008	2	96	Ray Davis (1)
		96	Ray Davis (4)
Total	12		

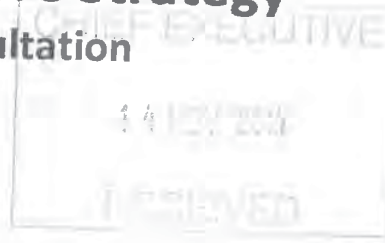


Knowsley Council

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
- 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	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.*

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

KGBS14

Policy Ref

E4

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is **not** legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to **support** the modification, please use this box to set out your comments.

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.

More specifically there are other traffic concerns about the site and the proposed 1700 dwellings. This is likely to generate at least 1500+ cars travelling off the site in the morning and evening and there must thus be concern over access points on Windy Arbor Road, Lickers Lane and Foxes Bank Lane. Access cannot be off the bottom of Windy Arbor Road after the M62 junction as deceleration would not be sufficient or lanes with good sight lines.

Access off Lickers Lane has considerations for school traffic and the presence of children crossing the road which means increased traffic and more danger. The additional 1500+ cars on a road system already struggling to cope would create greater air pollution, noise and significant risks of accidents.

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.

4. If you are objecting to the modification please set out how you consider it should be changed to make 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 wording in E4 says, "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", this would mean that builders need not put into place the high specifications needed in the development to mitigate climate change.

"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

The road infrastructure is not in place currently and replies and comments from the planning office team indicate that it will be looked at as and when the need occurs, leaving the 'plan' of road layout and structures in the hands of the developers with the planning office accepting, rejecting or asking for modifications during the development.

I suggest a thorough strategic plan for the infrastructure of surrounding areas and related traffic flow / problems should be put forward before greenbelt development occurs.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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



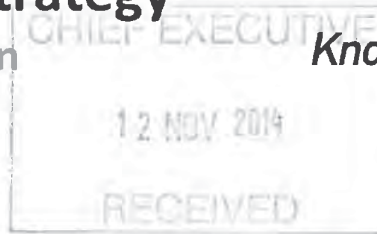
Date 13 Nov 14



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



RETURNING THIS FORM

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Mrs Irene Davls MRS IRENE DAVLS	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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.

Please see attached sheets in support of my view that the plan is not sound due to conflicts and is not legal because it doesn't take into account latest Government advice. It is also using out of date information; population projections from the ONS and an out of date Transport assessment

SEE COMMENTS IN RED.

Continue on a separate sheet if necessary...

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

It is also using out of date information; population projections from the ONS and an out of date Transport assessment. The council should carry out a new Transport assessment and a new Population projection. Also, protect green belt and use Brown field sites which would supply enough housing by their own admissions.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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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 hectare¹³.

In the case of South Whiston, 75% of the proposed area of 110.3 hectares minus 27.6 = 82.70 hectares @ 30 dwelling per hectare is 2481 dwellings. The council have only declared 1503 dwellings. This calls all of the council's estimates of housing into question. The proposal to bring forward Green Belt release on such a scale will also produce many more houses than the SHLAA calls for. Also the government has in October 2014 told councils to use the NPPF to protect Green Belt.

“Councils must protect our precious green belt land”

From: [Department for Communities and Local Government](#), [Brandon Lewis MP](#) and [The Rt Hon Eric Pickles MP](#)

First published: 4 October 2014 # Last updated: 6 October 2014

Part of: [Improving the energy efficiency of buildings and using planning to protect the environment](#), [Climate change](#), [Environment](#) and [Planning and building](#)

SUE 2c – Sustainable Urban Extension: South of Whiston and Land South of M62

5.44 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the further modifications to the policy would remove the specific reference to housing in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require the development to provide a wider choice of housing in the area. Consequently, given the substantial capacity of the site, it is considered that the policy has the potential to have a positive impact on the objective of providing good quality housing and this impact would become increasingly significant as the development is built out. The policy also promotes a significant amount of employment development in this location and, due to the scale of development that would be delivered, could also encourage further investment in the area, generate employment and training opportunities in the construction sector and help sustain existing local facilities. As such, the policy could also have a major positive impact on the objectives that relate to business growth and productivity; and reducing unemployment; and some positive effect on the objectives concerned with poverty and deprivation; and education and skills.

Any employment gains in the building industry are short term and will have little impact on local unemployment. With the reduction in affordable housing previously mentioned (3.26) how can the massive scale of over 2400 houses have a beneficial effect, without considerable investment in infrastructure. There are only two local primary schools, I question if they would have the capacity to cope with this massive

development. Already in (3.21 & 3.22) the question of environmental and green space negative impacts have been mentioned, a development on this scale would surely cause a negative impact on all those areas mentioned.

5.45 The policy would also result in residential development being directed to a location that is within reasonably close proximity of established employment areas and a number of local facilities, including primary schools, a GP and health centre and a local shopping centre on Greenes Road. It also requires new development in this location to contribute towards public transport provision and improve links to Whiston railway station. As such, the policy could have a positive impact on the objectives that relate to improving access to services and amenities; and the use of more sustainable transport modes.

Local transport in Whiston is very poor and anyone who is not a car owner and lives on Windy Arbor Road, has already seen a reduction in buses available since de-regulation. To suggest building a large number of houses will increase local transport is naïve in the least and downright misleading. The development by Halton in Cronton has not seen a vast increase in bus traffic and hardly a bus is available late at night. The local shopping centre mentioned is log jammed at busy times with cars and deliveries by Artics to Tesco and the odd truck using Whiston as a short cut from Tarbock island. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.46 Given the scale of development promoted, the policy has the potential to generate a significant amount of additional expenditure which could support nearby local centres. As such, the policy has the potential to have a positive impact on the objective that relates to the vitality and viability of town and local centres. In addition, a key element of the proposals for the site is the creation of a country park with associated footpaths, cycleways and bridleways, and the policy also requires development in this location to encourage walking and cycling and provide public open space. As such, it is considered that the policy could support participation in sport and recreation and could therefore have a positive impact on the objective that relates to health.

Why it is necessary for so much land to be considered for removal from the Green Belt, to the south of the M62. Only about a third of this is reported to be for development. It has been said that the rest will form a Country Park, on the Old Cronton Colliery site. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.47 The policy would however have the potential to have a negative impact on a number of objectives. In particular, it directs development to a greenfield site that contains large areas of Grade 2 Best and Most Versatile agricultural land. As such, the policy would have a major negative impact on the objective that relates to protecting land and soil. Directing development to this location would also have a negative impact on the objective that relates to protecting landscape character;

and could have a negative impact on the objective that relates to biodiversity by resulting in the loss of priority habitat and/or by placing pressure on nearby Local Wildlife Sites. Nevertheless, there is only a low level of certainty about the impact of the policy on this objective.

There is a clear admission here of the negative impact of taking this area out of Green Belt. With the increase in Global commodity prices locally produced food is more important. The need to remove Grade 2 Best and Most Versatile agricultural land from the Green Belt is not proven and 5.47 highlights the negative impact of this policy.

5.48 The policy will result in development taking place in a location that is within reasonably close proximity to local facilities and would also require the development to contribute towards public transport, walking and cycling. However, the construction and operation of this development would inevitably result in carbon emissions and would inevitably generate a significant number of vehicular trips and associated emissions. Consequently, the policy has the potential to have some negative impact on the objectives that relate to mitigating climate change; and protecting air quality.

There is a clear admission within (5.48) that the development proposed is identified as having a negative effect on carbon emissions and would certainly fail in meeting our green responsibilities. The mention of a significant number of vehicular trips bears out our belief that there would be a serious impact on traffic congestion within Whiston.

5.49 The policy would also have an uncertain impact on some of the sustainability objectives. Specifically, the policy would result in development being directed to a location that is in close proximity to a number of heritage assets. Nevertheless, due to the scale of the site, there may be scope to incorporate an adequate buffer around these assets to protect their setting. In addition, the policy requires development in this location to comply with Policy SUE 2 which, amongst other things, requires new development to protect and enhance historic and architectural assets. As such, it is uncertain whether the policy would have a significant impact on the objective that relates to preserving and enhancing Knowsley's built heritage.

These comments can only reinforce the need for a structured approach to any release of Green Belt and more time should be spent understanding all the issues before we take a decision that cannot be revoked.

5.50 Although the policy directs development to a greenfield site which has the potential to function as part of the Borough's Green Infrastructure network, it also involves the creation of a country park and the requirement for development in this location to be subject to a master planning should ensure the appropriate retention and provision of objective that relates to providing and conserving green infrastructure is also considered to be uncertain. Areas of

Green Infrastructure. As such, the impact of the policy on the objective that relates to providing and conserving green infrastructure is also considered to be uncertain.

(5.50) Again mentions uncertainty in the council decisions and in my view at least suggests they don't know what will happen when developers have free reign to build on our Green Belt. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.51 Similarly, although the policy would result in development taking place in the vicinity of a number of water bodies, there is limited certainty over whether this would impact on the water quality of these waterbodies. Consequently, it is considered that the policy would also have an uncertain impact on the objective of protecting, improving and where necessary, restoring the quality of inland, and estuarine waters.

We have yet to see a definitive study of water quality after development, and we suggest the loss of some 110 hectares of open countryside will seriously impact local wildlife

KGBS 14 - South of Whiston

5.82 Policy SUE1 identifies South of Whiston as a SUE primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development including the Local Wildlife Site but excluding Public Open Space. This option would not introduce any phasing restrictions but would include a policy requirement for ancillary facilities (e.g. Retail and Public Open Space). The second option considered was to allocate the site for housing development with site-specific allocations for retail and Public Open Space provision but no phasing restrictions. The third option was to allocate the entire site for housing development with no phasing restrictions.

We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision.

5.83 The appraisal concluded that each of these would have a similar impact on a number of the sustainability objectives. In particular, given the substantial capacity of the site, it concluded that each option could have a major positive impact on the objective of providing good quality housing and that this impact would become increasingly significant as the development is built out. However, by introducing a potentially inflexible approach to the provision of open space and retail, the appraisal recognised that Options 2 could have an adverse impact on the deliverability of the site which reduces the level of certainty that the option would have a major positive impact on the objective. Due to the size of the area and the quantum of development it could accommodate, each of the options could also generate a number of employment and training opportunities in the construction sector and

could stimulate further investment in the area. As such, the appraisal noted that each of the options has the potential to have a positive impact on the objectives that relate to reducing deprivation; skills and training; business competitiveness; and unemployment.

Once again there is too much that is hopeful and of little certainty and i would re-iterate my previous comment. We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision. This decision is at odds with local Public opinion and also at odds with the localism bill.

5.84 The appraisal considered that each of the options would also result in development taking place in close proximity to a range of local facilities and amenities including primary schools, a GP and health centre and a local centre on Greene's Road and development in this location could make a contribution to the continued viability of these services and facilities. Options 1 and 2 would also support the provision of certain facilities/amenities within the site. As such, each of the options could have a positive impact on the objective that relates to access to services and amenities but there is a higher level of certainty that Options 1 and 2 would have a positive impact on this objective due to these options resulting in the provision of facilities on-site. Given the significant capacity of the site, each of the options also has the potential to have a positive impact on Knowsley's town centres and the local centre on Greene's Road by increasing levels of expenditure in these centres. As such, each option could have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town centres

The retail centres mentioned at Greenes Road is a small satellite and little could be done to expand it. Increasing the footfall would inevitably increase traffic in what is already a very congested area. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.85 The appraisal did however recognise that each of the options could impact upon the setting and significance of a number of heritage assets and have a negative impact on the objective that relates to Knowsley's built heritage. These assets are however located towards the edges of what is a large site and there may be scope to incorporate an adequate buffer around these assets to protect their setting. Consequently, there is only a limited level of certainty that each option would have a negative impact on this objective. By resulting in the loss of a significant area of greenfield land and by potentially placing pressure on areas of ecological value, each option could also have a negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the

objective that relates to air quality. There is however a lower level of certainty that Options 1 and 2 would have a negative impact on this objective as both of these options would support the provision of some facilities on the site which could reduce the need to travel and associated vehicle emissions. Each option could also have a major negative impact on the objective of adapting to climate change; a negative impact on the objective of mitigating climate change; and an uncertain impact on the objective that relates to protecting water quality.

Once again the councils own comments highlight the negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the objective that relates to air quality, and also increase congestion.

5.86 Each option would result in the loss of a substantial area of greenspace, sections of which are used for informal recreation, and could therefore reduce opportunities for participation in informal sport and recreation and thereby have a negative impact on the objective that relates to health. Nevertheless, Options 1 and 2 would provide support for the retention/provision of areas public open space and could therefore have a positive impact on the objective. Conversely, Option 3 would not support the retention/provision of areas public open space and would therefore have a negative impact on the objective. Options 1 and 2 would also result in the provision of some facilities on the site which could help reduce the need to travel and have a positive impact on the objective that relates to reducing the need to travel and improving the use of more sustainable transport modes. By contrast, as Option 3 would not directly support the provision of on-site facilities, this option has the potential to have a negative impact on this objective.

Once again the councils own comments highlight the negative impact on outdoor activities and recreation for local people.

CS5 - Green Belt

5.133 The revised policy would have a largely similar impact on the sustainability objectives to the version of the policy included in the Core Strategy Submission document.

The use of Green Belt for building is overwhelmingly opposed by the majority of residents. The reason used by the council for use and early release of Green Belt does not meet the NPPF in regard of the 5 purposes of Green belt and Extraordinary needs do not exist, to remove Best and Most Versatile agricultural land. It is also at odds with latest government thinking. See 4.10

5.134 The policy would continue to protect the majority of Green Belt from inappropriate development but, as with the previous version of the policy, would support the identification of a series of sites for release from the Green Belt to ensure that there is sufficient housing and employment land to meet the needs of the Borough. However, the proposed modifications to the policy would mean that the release of these Sustainable Urban Extensions (SUEs) is no longer controlled by a phasing mechanism and the modifications would also result in these sites being allocated for development rather than just identified as broad locations. These modifications mean that the SUEs would now be more likely to come forward earlier in the plan period. As a result, many of the impacts that would have occurred in the longer term under the version of the policy included in the Core Strategy Submission document would now occur earlier in the plan period under the revised policy.

The rapid release of Green Belt land can only be to the benefit of developers and will put back development of brown field sites. The council admitted at the hearing that early release of Green Belt will result in the delay of development of brown fields, and this too is highlighted by latest government thinking, see 4.10. The proposal to release Green Belt early is a poor decision not made in the best interests of local people. We will quickly see what a poor decision it was.

5.135 By continuing to support the identification of SUEs and safeguarded land for housing and employment development the amended policy would continue to ensure that there is sufficient land to meet the Borough's development requirements. It is therefore envisaged that the revised policy would still have a positive effect on the objectives relating to poverty and deprivation; housing; the growth potential of business sectors; and maintaining high and stable levels of employment. However, as noted above, these impacts are now predicted to occur earlier in the plan period. In addition, by potentially resulting in the SUEs coming forward earlier in the plan period, the modifications to the policy could result in the SUEs competing with the Council's regeneration objectives for urban areas. As a result, the modifications to the policy reduce the level of certainty that it would have a positive impact on the objective that relates to poverty and deprivation.

The proposal to release Green Belt early will impact on the council stated regeneration objectives. Little in the way of long term employment will come from vast housing estates, only a greater demand on roads, schools, GP's and a lowering of air & water quality with an increase in noise pollution.

5.136 In addition, as the amended policy would result in some housing and employment development taking place in areas on a series of predominantly greenfield sites that are presently within the Green Belt, it could have a negative effect on the objective relating to land and soil and an uncertain effect on the objectives relating to landscape character and accessibility; and Green Infrastructure. Key mitigation measures to address some of these impacts will include ensuring new

development is built to an appropriate density, retaining areas of woodland, securing the provision of on-site open space, and securing appropriate landscaping to moderate the impact of proposals on the local landscape character.

I have already called into dispute the density quoted by the council as the proposal in South Whiston and the Council average density of 30 dwellings per hectare is significantly above the information they have given the public and what they have consulted on. Consultation is 1503 against 2481 according to calculation using average density(4.10). Latest planning applications are far in excess of what the public were told, Recently Knowsley gave outline planning permission for 207 dwellings at Bank Lane, Kirkby (even though the site is still in the Green Belt). This is a difference of 76 dwellings, and represents a 58% increase on the capacity that Knowsley Council said the site had.

5.137 As some of the SUEs are used for informal recreation and others contain sports pitches, it is considered that the revised policy could also still have a long term negative impact on health. The proximity of some of the locations to designated heritage assets and the presence of archaeological assets within some of locations mean that the revised policy would also still have an uncertain impact on the objective relating to built heritage in the longer term. It is also considered that the policy still has the potential to have a negative impact on the objective relating to biodiversity. Undertaking ecological surveys, excluding areas of priority habitat from the developable area and the provision of on-site habitats are all likely to be key mitigation measures. However, as noted above, these impacts are now predicted to occur earlier in the plan period.

Uncertain impact on archaeological assets within the area will be compromised. We have not seen Ecological research to discredit the assertion that removing this area from Green Belt will not have a catastrophic effect. The modifications will bring the ecological disaster forward, so that we may see them before our Grandchildren do.

5.138 The revised policy still would have the potential to result in more dispersed patterns of development. In addition, the construction and operation of the development that would be delivered on the SUEs would inevitably result in carbon dioxide emissions. Consequently, and notwithstanding the fact that the Knowsley Local Plan Transport Feasibility Assessment (2012) identified that some of these locations have good accessibility to bus routes, cycle routes and services and facilities, it is considered that the revised policy would still have an uncertain effect on the objectives relating to mitigating climate change; protecting air quality; and minimising the need to travel.

This point is broadly supporting our ascertainment as to the detrimental impact on traffic within the area. Local People contest the accuracy of the Knowsley Local Plan Transport Feasibility Assessment (2012) as our research carried out by local people show more than 400 vehicles per 30 minute session at peak times and if deliveries took place to Tesco with Artic then the whole area became log jammed. Only one bus per

hour was spotted until 7pm when the service stopped. We would assert that the transport assessment is out of date and not relevant to the increase in traffic we have seen and would call for another assessment to be carried out.

CS14: Principal Regeneration Area – Prescott Town Centre

5.156 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process. The revised policy would still direct investment to Prescott town centre and would seek to intensify its retail function, encourage a wider mix of uses and create a distinctive identity and a complimentary evening economy. As such, the revised policy would still have the potential to have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town and local centres. The amended policy wording does however remove some of the restrictions placed on retail development in Cables Retail Park. In particular, it is no longer specified that retail development within Cables Retail Park should provide for convenience or bulky goods retailing and should maintain the current retail floorspace capacity of the Retail Park. These amendments could increase the scope for further investment in the Retail Park and result in a consequential reduction in investment in Prescott town centre, particularly as the Knowsley Local Plan Economic Viability Assessment (2012) indicates that comparison retail in Prescott town centre is generally unviable in current market conditions. This reduces the level of certainty that the revised policy would have a positive effect on the objective.

Prescot town centre is run down and irrelevant in retail terms, even the council have had to move offices to an ex pub at vast expense, just to fill another empty building. When the council allowed Tesco to build a massive supermarket at Cables Retails park it as good as sounded the death knell of Prescott town centre. (5.156) Broadly agrees with our assessment.

5.157 By reducing the level of certainty that the policy would support investment in Prescott town centre, these proposed amendments mean that there is also a lower level of certainty that the revised policy would have a major positive impact on the objective that relates to protecting and enhancing Knowsley's built heritage.

Not proved

5.159 There are no anticipated negative effects on the sustainability objectives. The proposed modifications would not however prevent the policy from having an uncertain impact on the objective relating to mitigating climate change

Not proved. Agrees with earlier points that state the policy with have a detrimental effect on climate change.

5.177 The revised policy also still encourages the re-use of vacant and underused historic assets and states that favourable consideration will be given to schemes that enhance the importance of the asset for the economy. The policy could thereby result in the creation of premises for new businesses. In addition, protecting and enhancing buildings and features of historic interest should help create more attractive places to invest in and could lead to enhancements to Prescot town centre. Consequently, the amended policy would also continue to have the potential to have a positive effect on the objectives relating to poverty and deprivation; increasing the number of new businesses; enhancing the vitality and viability of town and local centres; and maintaining high and stable levels of employment and reducing long-term unemployment.

Developers will not consider run down existing areas, whilst vast areas of Green Belt are available, which are considerably easier to develop.

CS21: Green spaces and Trees

5.179 The proposed modifications to the policy would have some impact on the performance of the policy against a number of sustainability objectives. In particular, although the revised policy still seeks to resist new development which would result in the loss of greenspace and would provide support for the provision of new areas of greenspace, the modifications to the policy mean that it would now encourage the retention of existing trees and woodlands and the appropriate planting of new trees rather than require this. This amendment to the policy wording is considered to reduce the level of certainty that existing trees would be retained and new planting secured. Consequently, whilst it is considered that other aspects of the policy would ensure that it continues to have a major positive impact on the objectives that relate to landscape character and green infrastructure; and a positive impact on the objectives that are concerned with adapting to climate change; mitigating climate change; water quality; and air quality; it is considered that this modification results in only moderate certainty that the policy would have a positive effect on these objectives.

Once Knowlsey has shown itself to be open to removing Green Belt from protection, future planning applications will use this behaviour to push for more releases. This is a slippery slope that Knowlsey council have embarked on which will create a borough which only has an ex tip and non-public green space.

5.181 The revised policy would still seek to resist the loss of greenspace and would provide support for the improvement of existing public open spaces and encourage the provision of new greenspaces. It could therefore help provide opportunities for participation in sport and recreation which would have a positive effect on the objectives relating to health; and poverty and social deprivation. It is however recognised that the provision of opportunities for sport and recreation does not necessarily guarantee engagement in these activities and, as a result,

there is only a low level of certainty about the effect on these objectives.

I would welcome the opportunity to see where Knowsley believe they can get new green spaces from? Also the council have overstated the positive impact on health, poverty and social deprivation that a vast estate of houses can have. It is more likely that this influx of residents could also increase anti-social behaviour.

CS22: Sustainable and Low Carbon Development

5.183 It is envisaged that the proposed modifications to the policy for Sustainable and Low Carbon Development would have a number of impacts on its performance in the sustainability appraisal process. The amended policy still requires development to incorporate a range of measures which would improve its sustainability. Nevertheless, the removal of the requirement for new development to achieve particular Code for Sustainable Homes/BREEAM standards and the removal of the requirement for development to incorporate decentralised and low carbon energy, means that there is a lower level of certainty that the policy would have a major positive effect on the objective that relates to mitigating climate change. Similarly, by not requiring new development to achieve particular Code for Sustainable Homes/BREEAM standards it is considered that the policy is less likely to result in new developments which incorporate water conservation measures or make use of recycled materials. As such, the proposed modifications mean that there is a lower level of certainty that the policy would have a positive impact on the objectives that relate to minimising the production of waste and increasing recycling rates; and ensuring the prudent use of water and mineral resources.

To remove the need for developers to meet Code for Sustainable Homes/BREEAM standards is another nail in the coffin of our councils green credentials. It is a bizarre decision at the start of the 21st century, particularly as we all face the prospect of climate change. The demand on energy, water and other resources is likely to be much higher.

5.184 In addition, the removal of the requirement to achieve certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.

Once again this point is totally at odds with other statements and shows that there would be a negative effect on the objectives that relates to poverty and deprivation; and health.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	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.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The development of Green Belt in Whiston will have a negative effect on the aim to mitigate climate change. The Sustainable and Low Carbon Development (S.183 S032-CS22) removal of the developers need to meet sustainable homes/ BREEAM standards will increase energy ~~usage~~. The increased traffic in the area will increase carbon emissions and have a detrimental effect on air quality. The Industrial Estate mentioned on Windy Arter Road has little effect on employment as the few factories that are occupied, have no need for more workers. There is also an acceptance that this development will not be suitable for energy generated by renewable sources. In addition, the removal of the requirement to achieve a certain Code for Sustainable Homes standards mean ~~that~~ there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health. "The need to build more sustainable housing with a limited supply of land means that innovation is necessary but working towards sustainable communities relies on more than the achievement of zero carbon housing; its success will also be determined by the selection of appropriate locations for development", Neil Williamson 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

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

01/11/14.



[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)

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

RETURNING THIS FORM

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	K Meredith	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055 to

Policy Ref

KGBS 14

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion, especially as most of my neighbours have only just heard of the proposals to build on Green Belt at South Whiston. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states “Planners must protect our Green Belt” see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. There is a Duty to Co-Operate which has not been considered.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton. This is not consistent with National Policy.
Continued on separate attachment.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

Date 13/11/14

Attachment – Objections to KGBS 14

<p>E1 To protect, enhance and manage the local character and accessibility of the landscape and countryside across Knowsley</p>	<p>Although some of the locations that would be released from the Green Belt contain areas that have been previously developed and other policies in the plan will seek to protect landscape character, each of the options could support the release of areas of greenfield land and have a negative impact on landscape character. As such, each of the options has the potential to have a negative impact on the objective. However, Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being ‘called in’ by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term. It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward</p>
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Objections:

- The purposes of Green Belts in planning policy are clear – to protect the countryside from urban sprawl and to retain the character of towns and cities (Natural England, 2010). The proposal to release the Green Belt in South Whiston will exacerbate urban sprawl and its identity and character as a village community will be lost.
- As this is the last area of Green Belt within the South Whiston area the residents will no longer have access to the natural environment and all the benefits that the natural landscape exhibits.
- Those areas which are not to be included in the release from Green Belt – Old Wood and Big Water – would be severely impacted by the influx of residents to the proposed development. These features would be isolated amidst the proposed development and would be rendered unsustainable as a quality natural landscape and habitat for wildlife.
- Release of the Green Belt in South Whiston will contradict the purpose of Green Belt ‘to retain attractive landscapes, and enhance landscapes, near to where people live’.
- The local character and natural landscape of South Whiston stem from the early 12th century (Merseyside Historic characterization Project, 2011). The loss of this natural landscape held within the very last of the Green Belt in South Whiston would see the complete eradication of all the historic character that currently remains. The heritage of South Whiston would thus be lost for all current and future residents.
- Whiston is a ‘village’ with a village community. The proposed development would eradicate this village community as numbers would be too great for the community to be considered a village any longer.

E2	Each of the options could support the release of
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<p>To protect, enhance and manage biodiversity, the viability of protected and endangered species, habitats, geodiversity and sites of geological importance.</p>	<p>land from the Green Belt to meet the Borough's housing and employment needs. A number of these Sustainable Urban Extensions contain Local Wildlife Sites and others are located in close proximity to them. In addition, as significant number of the Sustainable Urban Extensions also contain areas of priority habitat. As such, each of the options has the potential to have a negative impact on the objective, although it is acknowledged that other policies in the plan seek to protect biodiversity and features of ecological importance. Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being 'called in' by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term as it may not provide the certainty for the development industry required to guarantee the necessary investment to bring such sites forward for development.</p> <p>It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward.</p>
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Objections:

- The protection, enhancement and management of the remaining area of ecologically isolated green belt will be rendered a belated and insufficient attempt to restore/protect/fix what has already been lost.
- Ecological dispersal and colonization of protected and endangered species will be prevented via fragmentation of vital habitat networks; inadequate dispersal of species will cause a local and regional extinction of nationally significant and endangered species. (Harrison and Bruna, 1999)
- Agricultural land adjoining Big Water and Old Wood is currently providing essential refuge for nationally endangered, red listed grey partridge, a victim species that relies on farming systems for its food source and habitat. (RSPB, 2014). There is a significant population throughout the agricultural land surrounding Big Water and Old Wood. Nationally 87% of the population of grey partridge has been lost since the 1970's, a direct result of habitat fragmentation and loss. It can be expected to deteriorate further owing to the potential loss of the agricultural green belt of South Whiston.
- The agricultural land adjoining Big Water and Old Wood provides refuge and food source for sky lark which has reduced nationally in population by 62%, overall farmland bird species which have reduced by 56%, and lapwings which have fallen in population by 76% since the 1970's (RSPB, 2014). This land is also the hunting, nesting and breeding grounds of buzzards and barn owls the numbers of which will be directly and severely impacted by the loss of the agricultural green belt in South Whiston. So too the population of their prey of field mice, voles and rabbits.
- Impact of human activity upon the remaining area of Greenbelt, i.e. Big Water and Old Wood after development has taken place would have a detrimental effect upon the quality of natural habitats and upon all local species. Increase in human population in addition to the close

proximity to the remaining Greenbelt will further degrade the natural environment as a result of vandalism and overall human impact.

- Without sufficient connectivity of green corridors the isolated patches of Greenbelt will suffer a loss of biodiversity and environmental quality. Current natural linkages connecting Stadt Moers to the South Whiston Greenbelt would be disconnected by the proposed development, preventing colonization and migration of species.
- Migrating water fowl e.g. Swans, Canadian Geese, Coots, Moorhens, Herons which frequent big water will diminish due to the encroachment of urban sprawl. This will have a detrimental effect upon the quality of Big Water fresh water habitat as they naturally manage the fresh water habitats.
- Had a full ecological and habitat survey been undertaken by KMBC it would have established, in summary, that the urban fringe woodland of Old Wood and Big Water, and supportive agricultural land, all within the green belt of South Whiston, was essential to the conservation of the abundance of wildlife and thus their sustainable future.

<p>E3. To adapt to climate change including flood risk.</p>	<p>The Strategic Flood Risk Assessment identifies that a small part of the southern section of the site is at risk of fluvial flooding. This risk of flooding will be exacerbated by climate change and this part of the site should only be considered for development as part of a sequential approach. It is recognised that the identified capacity of the site has been derived from the assumption that the portion of the site within Flood Zones 2 and 3 will be excluded from the developable area and unless this is the case, and the other identified mitigation measures are implemented, the proposals could have a negative impact on the objective and its sub-objective of reducing flood risk.</p> <p>The Preliminary Flood Risk Assessment indicates that the site also falls within an area that is susceptible to ground water flooding. Nevertheless, the PFRA does recognise that there is a lack of local information in relation to groundwater flooding and that the dataset used only identifies wider areas that may be at risk from groundwater flooding. Accordingly, the information on groundwater flooding is caveated by the acknowledgement that only isolated locations within the overall susceptible area are likely to suffer the consequences of groundwater flooding. Nonetheless, the proposals would result in a significant area of greenfield land being replaced with built development which may have an adverse impact on levels of surface water run-off if suitable measures are not implemented, such as sustainable drainage systems.</p> <p>The proposals would also result in the loss of a greenfield site that has the potential to provide habitat for species and help mitigate higher summer Temps associated with climate change.</p>
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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 & 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 & a local shopping centre on Greene’s Road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opp side of Windy Arbor & Huyton Bus Park which may reduce the need to travel for work. Nevertheless, these community facilities are some distance from the eastern and southern sections of the site and only the northern sections of the site are within 800m of Whiston railway st & not all of the site is in close proximity to the existing bus routes on Windy Arbor & Lickers Lane. The proposer of the site has also stated that the proposals would include on-site facilities, the provision of new bus routes through the site and that the development would be designed to encourage walking and cycling. Both Options 1 &2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, due to the number of trips that a development of this scale would be likely to generate, it is considered that each of the options has the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of on site facilities.</p>
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Objections:

- It is highly unlikely that a development of over 1500 houses would improve air quality especially if you take into account the level of traffic increase. The suggestion that walking to Greenes Road is an option for a non car owning elderly or young person in winter is a non-starter. Bus services are poor in Whiston at best and non-existent after 8pm at the southern end of Windy Arbor Road.
- “Our farmland and countryside can produce high-quality food and support wildlife when trees play a part in the landscape. We all breathe easier when there are beautiful woods in which to

relax and unwind. And yet the UK needs more trees. We are one of the least wooded countries in Europe and trees and woods continue to disappear from our landscapes”. *Woodland Trust*

- There is a need to reduce the need to travel by car and increase the use of more sustainable forms of transport. Economic activity rates and incomes are lower in Knowsley than the NorthWest average.
- There is a need to retain a greater proportion of retail expenditure within Knowsley to enhance the vitality and viability of the Borough’s town centres.
- 2 of the 15 conservation areas in Knowsley are included on the latest Heritage at Risk register;
- Access to areas of natural and semi-natural open space is poor in parts of the Borough;
- There is a need to conserve and enhance the natural environment recognising the importance of biodiversity.
- There is a need to secure and promote increased energy efficiency and renewable energy sources;
- There is a need to promote and secure more sustainable waste management.
- There is a need to consider the impacts of flooding and flood risk;
- The re-use of land should be promoted to minimise the take-up of greenfield land.

Source: Sustainability issues were derived from the baseline data gathered in 2008 – 2009 to inform the SA SD07 Scoping Report, Knowsley council

None of the Knowsley MB goals, above, will be achieved by releasing Green Belt.

“Air pollution is currently estimated to reduce the life expectancy of every person in the UK by an average of 7-8 months. The measures outlined in the strategy could help to reduce the impact on average life expectancy to five months by 2020, and provide a significant step forward in protecting our environment.” DEFRA The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

<p>E9. To use water and mineral resources prudently and efficiently.</p>	<p>Each of the options is unlikely to have any significant effects on the objective.</p>
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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.

THE EMERSON GROUP

EST. OVER 55 YEARS

Planning Department
E-mail: [REDACTED]

PLANNING DEPARTMENT

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[REDACTED]
Local Plan Team
Knowsley MBC
1st Floor Annexe
Municipal Buildings
Archway Road
Huyton
L36 9YU

Our ref: MD/Planning

14 November 2014

Dear [REDACTED]

**RE: KNOWSLEY LOCAL PLAN CORE STRATEGY PROPOSED MODIFICATIONS,
AUTUMN 2014 – CONSULTATION RESPONSE ON BEHALF OF ORBIT
INVESTMENTS (PROPERTIES) LIMITED**

I am writing to provide comments on behalf of Orbit Investments (Properties) Limited regarding the above, which are set out on the attached, completed Representations Forms.

Orbit Investments (Properties) Limited, part of The Emerson Group, owns Academy Business Park, as illustrated by the attached Estate Plan (389-SCH-1019). The site is situated at a prime "gateway" location fronting Knowsley Industrial Park. At 10.79 hectares in size, it provides a key opportunity to contribute to the local economy through the adaptation of existing buildings and creation of new build premises fit for modern business needs.

Orbit's view is that the Local Plan Core Strategy with the Proposed Modifications is largely sound, subject to the changes requested in the attached Representations Forms. These objections relate to the location of the proposed "Services Hub" in Policy CS11 and the viability of sustainable and low carbon development in Policy CS22.

I would be grateful if you could confirm receipt of the attached comments. Should you wish to discuss any of these points in further detail, please do not hesitate to contact me.

Yours sincerely,

[REDACTED]
Matthew Dugdale
Planner

Enc. Proposed Modifications Representations Forms (Autumn 2014)
Estate Plan (389-SCH-1019)

DIRECTORS: PE JONES OBE (CHAIRMAN) ME JONES (DEPUTY CHAIRMAN)
AE JONES AC WEATHERBY BA (Law) (SECRETARY) J EDWARDS BSc (Hons) FCMA CGMA (FINANCIAL)
SP WILSON JP BURGESS BA (Hons) Law MST ROYLE BA (Arch) JR CLABER BSc (Hons)
NON-EXECUTIVE DIRECTORS: AJ WHITE BEng A JONES THE LORD LEE OF TRAFFORD DL FCA JP ALLEN ACIB DipFS
EMERSON DEVELOPMENTS (HOLDINGS) LTD

REGISTERED OFFICE [REDACTED]

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title		Mr
Name		Matthew Dugdale
Job Title (if appropriate)		Planner
Organisation (if appropriate)	Orbit Investments (Properties) Limited	
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 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.

Orbit support the reference to Lees Road as a “gateway” location, as requested in comment #1105 (December 2012).

4. If you are objecting to the modification please set out how you consider it should be changed to make 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

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

14/11/2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Orbit Investments (Properties) Limited

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M150

Policy Ref

CS11.1(d)

Paragraph Ref

6.27

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 type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Orbit agree with the need for a Local Service Centre (or “Services Hub”) at Knowsley Industrial Park. However, as previously stated in comment #1105 (December 2012), there is little justification for a local service centre to be located specifically at South Boundary Road. An application (11/00055/OUT) for mixed use development at the junction of South Boundary Road and Hornhouse Lane, including 1,115 sqm of commercial floorspace (use classes A1, A2, A3, A5 & D1), was refused by the Council 19th October 2011 for 3 reasons including: a detrimental impact on the viability and vitality of Kirkby Town Centre and loss of employment land without any regeneration benefit. As such, the policy as worded is not justified or effective.

Therefore, Orbit request that the location of the “Services Hub” be delegated to the Local Plan Site Allocations and Development Policies document, in order that full consideration can be given to suitability, availability and viability of sites. This is the approach taken by Policy CS6 (Town Centres and Retail Strategy) and reflective of NPPF paragraph 23, which should be mirrored by Policy CS11.1(d) in order to ensure consistency in approach across the Plan.

Academy Business Park, as identified on the attached Estate Plan (389-SCH-1019), could provide a suitable location for small scale shopping and services to serve the needs of the workforce. This would be a sustainable location which is highly visible, accessible and more sequentially preferable than the South Boundary Road site. In addition, the site currently benefits from implemented planning consents for a petrol filling station and drive-thru restaurant (04/00275/FUL & 04/00276/FUL), which are compatible uses to serve the needs of local businesses on the Park. The provision of such uses at the southern end of the site would not prejudice the wider redevelopment of the site for B8 warehousing and distribution.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make 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 text in Policy CS11.1(d) should be re-worded to remove specific reference to South Boundary Road and be replaced with a more generic location that can be defined by the Allocations and Development Policies document and Policies Map, as follows:

"d. A local service centre (or "Services Hub") at ~~South Boundary Road~~ A5208 County Road South/South Boundary Road/Moorgate Road/Arbour Lane/Lees Road, to provide small scale shopping and services to serve the needs of the workforce within the Park, will be defined on the Policies Map by the Local Plan Site Allocations and Development Policies document".

The last bullet point of paragraph 6.27 would also need amending accordingly.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and 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

14/11/2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Orbit Investments (Properties) Limited

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M210

Policy Ref

CS22.5

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|--------------------------|
| e) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Sound? (see guidance note 2.3) | <input 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.

Orbit support the removal of part 5 of the policy relating to Sustainable Construction Targets.

4. If you are objecting to the modification please set out how you consider it should be changed to make 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

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and 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 14/11/2014

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 checked="" type="checkbox"/>	<input 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.

Policy CS22 needs to include reference to the viability of delivery of sustainable and low carbon development.

Flexibility is required so that delivery of this policy does not make schemes unviable.

4. If you are objecting to the modification please set out how you consider it should be changed to make 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 stated in comment #1105 (December 2012), Orbit request that the words "and/or viability" be inserted after the words "subject to feasibility".

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and 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 14/11/2014

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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| j) 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.

Orbit support the removal of the last sentence from part 6 of the policy relating to the payment towards independent scrutiny of submitted viability evidence.

4. If you are objecting to the modification please set out how you consider it should be changed to make 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

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

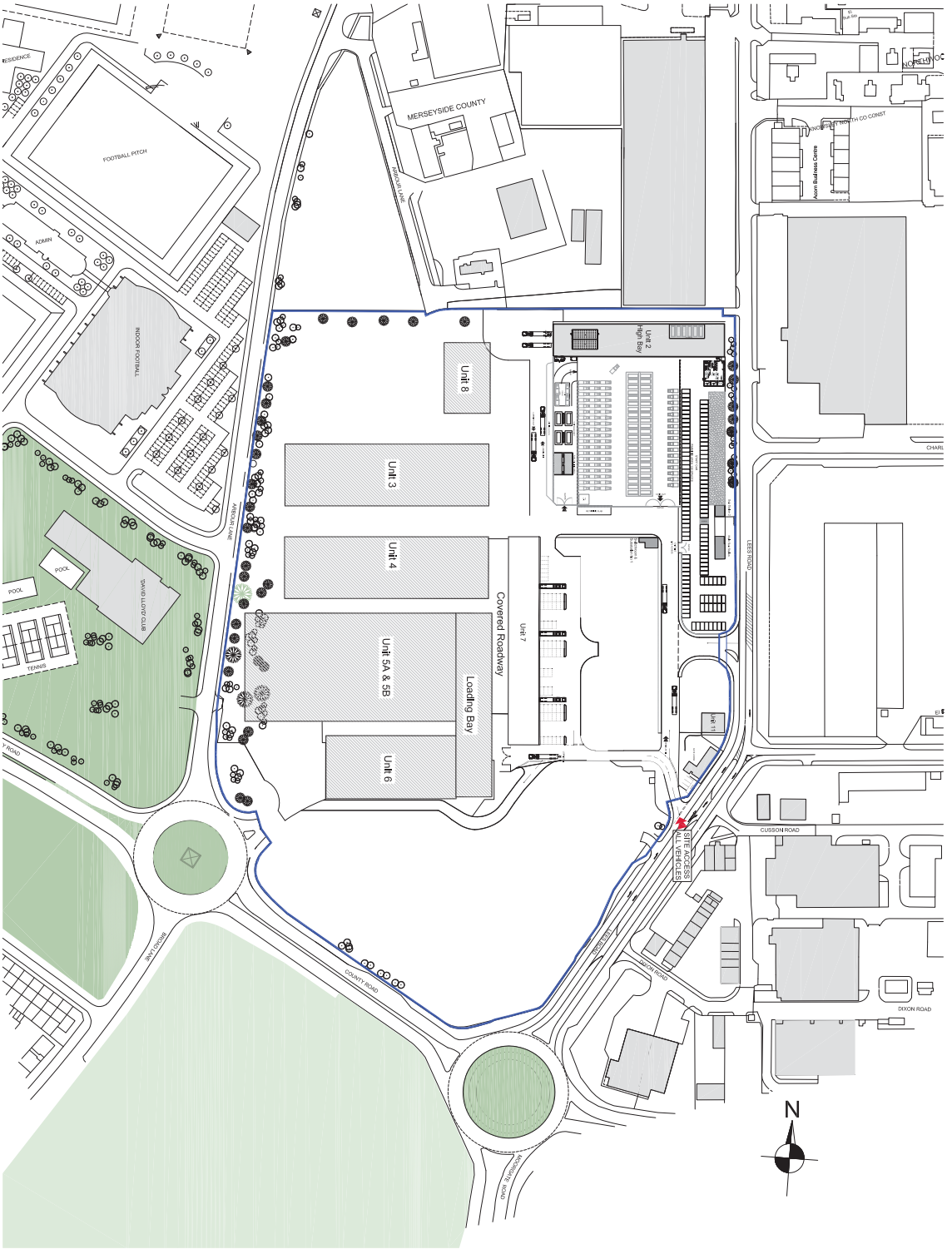
- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

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Signature

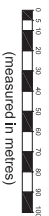


Date 14/11/2014



SITE PLAN scale 1:1250

This Contract is made for the design, manufacture and erection of the works set out in the Appendixes hereto. It is made on the basis that the Contractor shall be responsible for obtaining all necessary permissions to be worked to only. Subject to all Local Authority and Statutory approvals. DO NOT SCALE



REV / DESCRIPTION	DATE

Orbit
Developments

ESTATE PLAN

ACADEMY BUSINESS PARK
KNOWSLEY

Scale: 1:1250 @ A1

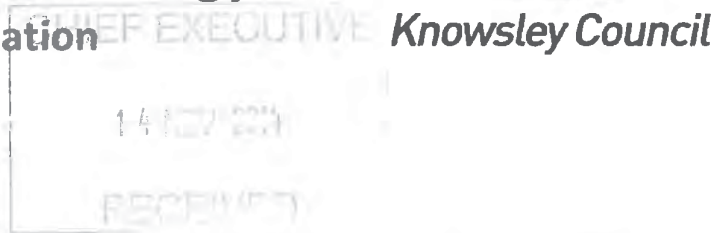
Date: 10.10.14

389-SCH-1019



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr S	
Name	Patricia McDonald-Holmes	
Job Title (if appropriate)	Printmaker Artist / Teacher	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

PATRICIA McDONALD HOMES

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS14

Policy Ref

E4

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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It is quite clear that the development of Green Belt in Whiston will have an overall negative effect on the aim to mitigate climate change. The carbon footprint of each dwelling and the scale of development will produce large quantities of carbon monoxide and air pollution. The destruction of plant life and removal of trees will add to the effect of poor air quality. An estimate of 80 tonnes GHG is created for the construction of a brand-new cottage with two bedrooms upstairs and two reception rooms and a kitchen downstairs.

From the KGBS14 document, It is noted that the Knowsley Renewable and Low Carbon Energy Options study (2009) considered that a purely residential development of the area would be unlikely to readily lend itself to a district heating opportunity, meaning more GHG created from individual homes.

In addition, the site is not located within a 'Priority Zone' for renewable and low carbon energy as identified by the Liverpool City Region Renewable Energy Capacity Study (2009) and it is therefore unlikely to deliver a reduction in carbon emissions beyond those required by Local Plan policies, which means that builders need not put into place the high specifications needed in the development to mitigate climate change.

The Sustainable and Low Carbon Development (5.183 SD32. CS22) removal of the developers need to meet the Sustainable homes/BREEAM standards will increase energy usage.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

With the decline in average household occupancy. More and more, people want to live alone or in small family units. In 2004, the average household occupancy was 2.34. By 2026 this is expected to reduce to 2.09 (DCLG, 2007). This issue does cause difficulties when attempting to reduce the carbon footprint of a household. A single person household does use more energy per person than a four person household. Therefore, instead of seeing a decline in energy use by households there is still a small annual increase in the region of 1% per year.

In addition to housing, there are numerous other issues that contribute to the carbon footprint of the average UK household. The construction, maintenance and household energy requirements equate to 25% of total GHG emissions in the UK. (John Barrett^{1,*}) and Thomas Wiedmann²)

Taking into account the paragraphs in E4 relating to mitigating climate change it is evident that Knowsley council itself believe it will not meet targets for the reduction of GHG if this development and destruction of greenbelt land goes ahead.

Continue on a separate sheet if necessary...

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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

13/11/14



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	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

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public, some residents have only just found out about the plans. I would maintain that the policies outlined in CS1 to 5, AD51 and the SUE documents are out of step with Public opinion, I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill. I consider the council have not utilised empty properties and brown field sites in its calculations of housing needs. The council have not considered infrastructure improvements to cope with the influx of people.

Paras:
3.2to3.24, 3.26,4.10,5.44to5.51,5.82to5.86,5.133to5.138,5.156,5.157,5.159,5.177,5.179,5.181,5.183,5.184

See attached sheets

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Carry out an up to date housing requirement survey taking into account the latest figures from the Office of National Statistics, 2014.

Carry out a relevant up to date Traffic Management survey, taking into account the existing loads at peak times and the additional loads placed upon the area with an influx of at least 3000 additional vehicles.

Consider the impact on local services such as Doctor, Dentist, Schools, etc.

Insist that empty properties and brown field sites are developed before considering Green Belt release, and used to satisfy the 5 year plan. Brown field sites may well have the infrastructure already in place to cope with additional housing.

Put back any Green Belt release until end of plan period, and even then consider all other areas, green belt release should be the last resort, not the first action

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

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Signature



ate 03/11/2014

KNOWSLEY LOCAL PLAN: CORE STRATEGY

Submission and Objections regarding proposed modifications

Ray Davis
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

Implications for South Whiston and Prescot Town Centre – Please see my comments highlighted in red.

3.20 The appraisal concluded that the Spatial Strategy for Knowsley is likely to have a largely positive impact on the sustainability objectives. In particular, it is envisaged that the Development Principles (CS2) are likely to have a major positive impact in the long-term on the objectives relating to health; mitigating climate change; and reducing the need to travel. It was concluded that the policies for Housing Supply (CS3), the Economy and Employment (CS4) and Town Centres and Retail (CS6) would have a positive impact on a range of objectives, particularly those that relate to social and economic issues and the appraisal also predicted that the policy for Green Infrastructure (CS8) would have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; adapting to climate change; and green infrastructure.

I would question how removing green belt can have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; and adapting to climate change.

3.21 The appraisal of the Proposed Submission document did however consider that a number of the policies would have an uncertain or negative impact on some of the objectives. For instance, it concluded that a number of the policies, such as the Spatial Strategy (CS1) and Green Belt (CS5) could have an uncertain impact on a number of environmental objectives in the longer term due to the potential for it to result in the release of a number of sites in the Green Belt.

How can this statement hold true to statement at 3.20 one is negative and one positive?

3.23 Nevertheless, the appraisal of the Proposed Submission document acknowledged that as each of the policies would result in built development and would therefore lead to some carbon emissions associated with the construction and operation of this development, their impact on the objective relating to mitigating climate change is uncertain. It also considered that there is some uncertainty over the impact of the policy for Knowsley Industrial and Business Parks (CS11) on the objectives relating to air quality and need to travel, particularly as there is limited information available on the amount and nature of the new employment uses that would be delivered. In addition, due to

both policies resulting in the provision of B1 office development in an out of centre location, the impact of the policies for Knowsley Industrial and Business Parks (CS11) and South Prescott (CS13) on the objective relating to the vitality and viability of Knowsley's town centres was also deemed to be uncertain.

The actions contained within the Local plan are identified here as uncertain and would certainly fail in meeting our green credentials as the development of green belt out of centre would increase the carbon impact.

3.24 On the whole, the appraisal of the Proposed Submission document concluded that the Thematic Policies performed well in the SA process. In particular, the policies relating to housing and the accommodation needs of the community (CS 15 – CS18) were considered to all have a positive impact on the objectives relating to poverty and deprivation; health and the provision of good quality housing; the policies relating to Sustainable and Low Carbon development (CS22) and Renewable and Low Carbon Infrastructure (CS23) were considered to have a major positive impact on the objective relating to mitigating climate change; and the policy for Greenspaces and Trees (CS21) was considered to have a major positive impact on the objectives relating to landscapes; biodiversity; adapting to climate change; and green infrastructure.

How can this point be made as positive when the document already highlights the possibility of a negative impact on all of the CS range of reports?

Proposed Modifications to the Submission Local Plan

3.26 The initial Local Plan Examination hearing sessions took place in November 2013. Following these hearing sessions, the Inspector appointed to undertake the examination issued his interim findings in January 2014. In response to these findings, and also to reflect other required amendments, the Council proposed a number of modifications to the Plan. These modifications included a revised approach to the release of Sustainable Urban Extensions, a reduction in the employment land target for the plan period, a reduced target level of affordable housing provision on sites in the urban area and the prioritisation of different forms of developer contributions in instances where viability is insufficient to fund all the non-mandatory requirements set out in the Plan.

The reduced level of affordable housing can only be in the favour of developers, government guidelines call for a level of 25%. A reduced level of employment land means that the target of job creation must be flawed.

4.10 The scale of any impact on an objective has been predicted taking into account the size of the site and the quantum of development it is likely to accommodate. In relation to housing sites, where an approximate number of dwellings that could be accommodated on a site have not been provided by the promoter of the site, its yield has been estimated based on the standard multipliers used for assessing the capacity of sites within the Strategic Housing Land Availability Assessment

(SHLAA) and the Green Belt Study. For sites in excess of 2 hectares in site size, this assumed a 75% net developable area and a density of 30 dwellings per hectare¹³.

In the case of South Whiston, 75% of the proposed area of 110.3 hectares minus 27.6 = 82.70 hectares @ 30 dwelling per hectare is 2481 dwellings. The council have only declared 1503 dwellings. This calls all of the council's estimates of housing into question. The proposal to bring forward Green Belt release on such a scale will also produce many more houses than the SHLAA calls for. Also the government has in October 2014 told councils to use the NPPF to protect Green Belt.

“Councils must protect our precious green belt land”

From: Department for Communities and Local Government, Brandon Lewis MP and The Rt Hon Eric Pickles MP

First published: 4 October 2014 # Last updated: 6 October 2014

Part of: Improving the energy efficiency of buildings and using planning to protect the environment, Climate change, Environment and Planning and building

SUE 2c – Sustainable Urban Extension: South of Whiston and Land South of M62

5.44 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the further modifications to the policy would remove the specific reference to housing in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require the development to provide a wider choice of housing in the area. Consequently, given the substantial capacity of the site, it is considered that the policy has the potential to have a positive impact on the objective of providing good quality housing and this impact would become increasingly significant as the development is built out. The policy also promotes a significant amount of employment development in this location and, due to the scale of development that would be delivered, could also encourage further investment in the area, generate employment and training opportunities in the construction sector and help sustain existing local facilities. As such, the policy could also have a major positive impact on the objectives that relate to business growth and productivity; and reducing unemployment; and some positive effect on the objectives concerned with poverty and deprivation; and education and skills.

Any employment gains in the building industry are short term and will have little impact on local unemployment. With the reduction in affordable housing previously mentioned (3.26) how can the massive scale of over 2400 houses have a beneficial effect, without considerable investment in infrastructure. There are only two local primary schools, I question if they would have the capacity to cope with this massive

development. Already in (3.21 & 3.22) the question of environmental and green space negative impacts have been mentioned, a development on this scale would surely cause a negative impact on all those areas mentioned.

5.45 The policy would also result in residential development being directed to a location that is within reasonably close proximity of established employment areas and a number of local facilities, including primary schools, a GP and health centre and a local shopping centre on Greenes Road. It also requires new development in this location to contribute towards public transport provision and improve links to Whiston railway station. As such, the policy could have a positive impact on the objectives that relate to improving access to services and amenities; and the use of more sustainable transport modes.

Local transport in Whiston is very poor and anyone who is not a car owner and lives on Windy Arbor Road, has already seen a reduction in buses available since de-regulation. To suggest building a large number of houses will increase local transport is naïve in the least and downright misleading. The development by Halton in Cronton has not seen a vast increase in bus traffic and hardly a bus is available late at night. The local shopping centre mentioned is log jammed at busy times with cars and deliveries by Artics to Tesco and the odd truck using Whiston as a short cut from Tarbock island. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.46 Given the scale of development promoted, the policy has the potential to generate a significant amount of additional expenditure which could support nearby local centres. As such, the policy has the potential to have a positive impact on the objective that relates to the vitality and viability of town and local centres. In addition, a key element of the proposals for the site is the creation of a country park with associated footpaths, cycleways and bridleways, and the policy also requires development in this location to encourage walking and cycling and provide public open space. As such, it is considered that the policy could support participation in sport and recreation and could therefore have a positive impact on the objective that relates to health.

Why it is necessary for so much land to be considered for removal from the Green Belt, to the south of the M62. Only about a third of this is reported to be for development. It has been said that the rest will form a Country Park, on the Old Cronton Colliery site. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.47 The policy would however have the potential to have a negative impact on a number of objectives. In particular, it directs development to a greenfield site that contains large areas of Grade 2 Best and Most Versatile agricultural land. As such, the policy would have a major negative impact on the objective that relates to protecting land and soil. Directing development to this location would also have a negative impact on the objective that relates to protecting landscape character;

and could have a negative impact on the objective that relates to biodiversity by resulting in the loss of priority habitat and/or by placing pressure on nearby Local Wildlife Sites. Nevertheless, there is only a low level of certainty about the impact of the policy on this objective.

There is a clear admission here of the negative impact of taking this area out of Green Belt. With the increase in Global commodity prices locally produced food is more important. The need to remove Grade 2 Best and Most Versatile agricultural land from the Green Belt is not proven and 5.47 highlights the negative impact of this policy.

5.48 The policy will result in development taking place in a location that is within reasonably close proximity to local facilities and would also require the development to contribute towards public transport, walking and cycling. However, the construction and operation of this development would inevitably result in carbon emissions and would inevitably generate a significant number of vehicular trips and associated emissions. Consequently, the policy has the potential to have some negative impact on the objectives that relate to mitigating climate change; and protecting air quality.

There is a clear admission within (5.48) that the development proposed is identified as having a negative effect on carbon emissions and would certainly fail in meeting our green responsibilities. The mention of a significant number of vehicular trips bears out our belief that there would be a serious impact on traffic congestion within Whiston.

5.49 The policy would also have an uncertain impact on some of the sustainability objectives. Specifically, the policy would result in development being directed to a location that is in close proximity to a number of heritage assets. Nevertheless, due to the scale of the site, there may be scope to incorporate an adequate buffer around these assets to protect their setting. In addition, the policy requires development in this location to comply with Policy SUE 2 which, amongst other things, requires new development to protect and enhance historic and architectural assets. As such, it is uncertain whether the policy would have a significant impact on the objective that relates to preserving and enhancing Knowsley's built heritage.

These comments can only reinforce the need for a structured approach to any release of Green Belt and more time should be spent understanding all the issues before we take a decision that cannot be revoked.

5.50 Although the policy directs development to a greenfield site which has the potential to function as part of the Borough's Green Infrastructure network, it also involves the creation of a country park and the requirement for development in this location to be subject to a master planning should ensure the appropriate retention and provision of objective that relates to providing and conserving green infrastructure is also considered to be uncertain. Areas of

Green Infrastructure. As such, the impact of the policy on the objective that relates to providing and conserving green infrastructure is also considered to be uncertain.

(5.50) Again mentions uncertainty in the council decisions and in my view at least suggests they don't know what will happen when developers have free reign to build on our Green Belt. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.51 Similarly, although the policy would result in development taking place in the vicinity of a number of water bodies, there is limited certainty over whether this would impact on the water quality of these waterbodies. Consequently, it is considered that the policy would also have an uncertain impact on the objective of protecting, improving and where necessary, restoring the quality of inland, and estuarine waters.

We have yet to see a definitive study of water quality after development, and we suggest the loss of some 110 hectares of open countryside will seriously impact local wildlife

KGBS 14 - South of Whiston

5.82 Policy SUE1 identifies South of Whiston as a SUE primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development including the Local Wildlife Site but excluding Public Open Space. This option would not introduce any phasing restrictions but would include a policy requirement for ancillary facilities (e.g. Retail and Public Open Space). The second option considered was to allocate the site for housing development with site-specific allocations for retail and Public Open Space provision but no phasing restrictions. The third option was to allocate the entire site for housing development with no phasing restrictions.

We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision.

5.83 The appraisal concluded that each of these would have a similar impact on a number of the sustainability objectives. In particular, given the substantial capacity of the site, it concluded that each option could have a major positive impact on the objective of providing good quality housing and that this impact would become increasingly significant as the development is built out. However, by introducing a potentially inflexible approach to the provision of open space and retail, the appraisal recognised that Options 2 could have an adverse impact on the deliverability of the site which reduces the level of certainty that the option would have a major positive impact on the objective. Due to the size of the area and the quantum of development it could accommodate, each of the options could also generate a number of employment and training opportunities in the construction sector and

could stimulate further investment in the area. As such, the appraisal noted that each of the options has the potential to have a positive impact on the objectives that relate to reducing deprivation; skills and training; business competitiveness; and unemployment.

Once again there is too much that is hopeful and of little certainty and i would re-iterate my previous comment. We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision. This decision is at odds with local Public opinion and also at odds with the localism bill.

5.84 The appraisal considered that each of the options would also result in development taking place in close proximity to a range of local facilities and amenities including primary schools, a GP and health centre and a local centre on Greene's Road and development in this location could make a contribution to the continued viability of these services and facilities. Options 1 and 2 would also support the provision of certain facilities/amenities within the site. As such, each of the options could have a positive impact on the objective that relates to access to services and amenities but there is a higher level of certainty that Options 1 and 2 would have a positive impact on this objective due to these options resulting in the provision of facilities on-site. Given the significant capacity of the site, each of the options also has the potential to have a positive impact on Knowsley's town centres and the local centre on Greene's Road by increasing levels of expenditure in these centres. As such, each option could have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town centres

The retail centres mentioned at Greenes Road is a small satellite and little could be done to expand it. Increasing the footfall would inevitably increase traffic in what is already a very congested area. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.85 The appraisal did however recognise that each of the options could impact upon the setting and significance of a number of heritage assets and have a negative impact on the objective that relates to Knowsley's built heritage. These assets are however located towards the edges of what is a large site and there may be scope to incorporate an adequate buffer around these assets to protect their setting. Consequently, there is only a limited level of certainty that each option would have a negative impact on this objective. By resulting in the loss of a significant area of greenfield land and by potentially placing pressure on areas of ecological value, each option could also have a negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the

objective that relates to air quality. There is however a lower level of certainty that Options 1 and 2 would have a negative impact on this objective as both of these options would support the provision of some facilities on the site which could reduce the need to travel and associated vehicle emissions. Each option could also have a major negative impact on the objective of adapting to climate change; a negative impact on the objective of mitigating climate change; and an uncertain impact on the objective that relates to protecting water quality.

Once again the councils own comments highlight the negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the objective that relates to air quality, and also increase congestion.

5.86 Each option would result in the loss of a substantial area of greenspace, sections of which are used for informal recreation, and could therefore reduce opportunities for participation in informal sport and recreation and thereby have a negative impact on the objective that relates to health. Nevertheless, Options 1 and 2 would provide support for the retention/provision of areas public open space and could therefore have a positive impact on the objective. Conversely, Option 3 would not support the retention/provision of areas public open space and would therefore have a negative impact on the objective. Options 1 and 2 would also result in the provision of some facilities on the site which could help reduce the need to travel and have a positive impact on the objective that relates to reducing the need to travel and improving the use of more sustainable transport modes. By contrast, as Option 3 would not directly support the provision of on-site facilities, this option has the potential to have a negative impact on this objective.

Once again the councils own comments highlight the negative impact on outdoor activities and recreation for local people.

CS5 - Green Belt

5.133 The revised policy would have a largely similar impact on the sustainability objectives to the version of the policy included in the Core Strategy Submission document.

The use of Green Belt for building is overwhelmingly opposed by the majority of residents. The reason used by the council for use and early release of Green Belt does not meet the NPPF in regard of the 5 purposes of Green belt and Extraordinary needs do not exist, to remove Best and Most Versatile agricultural land. It is also at odds with latest government thinking. See 4.10

5.134 The policy would continue to protect the majority of Green Belt from inappropriate development but, as with the previous version of the policy, would support the identification of a series of sites for release from the Green Belt to ensure that there is sufficient housing and employment land to meet the needs of the Borough. However, the proposed modifications to the policy would mean that the release of these Sustainable Urban Extensions (SUEs) is no longer controlled by a phasing mechanism and the modifications would also result in these sites being allocated for development rather than just identified as broad locations. These modifications mean that the SUEs would now be more likely to come forward earlier in the plan period. As a result, many of the impacts that would have occurred in the longer term under the version of the policy included in the Core Strategy Submission document would now occur earlier in the plan period under the revised policy.

The rapid release of Green Belt land can only be to the benefit of developers and will put back development of brown field sites. The council admitted at the hearing that early release of Green Belt will result in the delay of development of brown fields, and this too is highlighted by latest government thinking, see 4.10. The proposal to release Green Belt early is a poor decision not made in the best interests of local people. We will quickly see what a poor decision it was.

5.135 By continuing to support the identification of SUEs and safeguarded land for housing and employment development the amended policy would continue to ensure that there is sufficient land to meet the Borough's development requirements. It is therefore envisaged that the revised policy would still have a positive effect on the objectives relating to poverty and deprivation; housing; the growth potential of business sectors; and maintaining high and stable levels of employment. However, as noted above, these impacts are now predicted to occur earlier in the plan period. In addition, by potentially resulting in the SUEs coming forward earlier in the plan period, the modifications to the policy could result in the SUEs competing with the Council's regeneration objectives for urban areas. As a result, the modifications to the policy reduce the level of certainty that it would have a positive impact on the objective that relates to poverty and deprivation.

The proposal to release Green Belt early will impact on the council stated regeneration objectives. Little in the way of long term employment will come from vast housing estates, only a greater demand on roads, schools, GP's and a lowering of air & water quality with an increase in noise pollution.

5.136 In addition, as the amended policy would result in some housing and employment development taking place in areas on a series of predominantly greenfield sites that are presently within the Green Belt, it could have a negative effect on the objective relating to land and soil and an uncertain effect on the objectives relating to landscape character and accessibility; and Green Infrastructure. Key mitigation measures to address some of these impacts will include ensuring new

development is built to an appropriate density, retaining areas of woodland, securing the provision of on-site open space, and securing appropriate landscaping to moderate the impact of proposals on the local landscape character.

I have already called into dispute the density quoted by the council as the proposal in South Whiston and the Council average density of 30 dwellings per hectare is significantly above the information they have given the public and what they have consulted on. Consultation is 1503 against 2481 according to calculation using average density(4.10). Latest planning applications are far in excess of what the public were told, Recently Knowsley gave outline planning permission for 207 dwellings at Bank Lane, Kirkby (even though the site is still in the Green Belt). This is a difference of 76 dwellings, and represents a 58% increase on the capacity that Knowsley Council said the site had.

5.137 As some of the SUEs are used for informal recreation and others contain sports pitches, it is considered that the revised policy could also still have a long term negative impact on health. The proximity of some of the locations to designated heritage assets and the presence of archaeological assets within some of locations mean that the revised policy would also still have an uncertain impact on the objective relating to built heritage in the longer term. It is also considered that the policy still has the potential to have a negative impact on the objective relating to biodiversity. Undertaking ecological surveys, excluding areas of priority habitat from the developable area and the provision of on-site habitats are all likely to be key mitigation measures. However, as noted above, these impacts are now predicted to occur earlier in the plan period.

Uncertain impact on archaeological assets within the area will be compromised. We have not seen Ecological research to discredit the assertion that removing this area from Green Belt will not have a catastrophic effect. The modifications will bring the ecological disaster forward, so that we may see them before our Grandchildren do.

5.138 The revised policy still would have the potential to result in more dispersed patterns of development. In addition, the construction and operation of the development that would be delivered on the SUEs would inevitably result in carbon dioxide emissions. Consequently, and notwithstanding the fact that the Knowsley Local Plan Transport Feasibility Assessment (2012) identified that some of these locations have good accessibility to bus routes, cycle routes and services and facilities, it is considered that the revised policy would still have an uncertain effect on the objectives relating to mitigating climate change; protecting air quality; and minimising the need to travel.

This point is broadly supporting our ascertainment as to the detrimental impact on traffic within the area. Local People contest the accuracy of the Knowsley Local Plan Transport Feasibility Assessment (2012) as our research carried out by local people show more than 400 vehicles per 30 minute session at peak times and if deliveries took place to Tesco with Artic then the whole area became log jammed. Only one bus per

hour was spotted until 7pm when the service stopped. We would assert that the transport assessment is out of date and not relevant to the increase in traffic we have seen and would call for another assessment to be carried out.

CS14: Principal Regeneration Area – Prescot Town Centre

5.156 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process. The revised policy would still direct investment to Prescot town centre and would seek to intensify its retail function, encourage a wider mix of uses and create a distinctive identity and a complimentary evening economy. As such, the revised policy would still have the potential to have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town and local centres. The amended policy wording does however remove some of the restrictions placed on retail development in Cables Retail Park. In particular, it is no longer specified that retail development within Cables Retail Park should provide for convenience or bulky goods retailing and should maintain the current retail floorspace capacity of the Retail Park. These amendments could increase the scope for further investment in the Retail Park and result in a consequential reduction in investment in Prescot town centre, particularly as the Knowsley Local Plan Economic Viability Assessment (2012) indicates that comparison retail in Prescot town centre is generally unviable in current market conditions. This reduces the level of certainty that the revised policy would have a positive effect on the objective.

Prescot town centre is run down and irrelevant in retail terms, even the council have had to move offices to an ex pub at vast expense, just to fill another empty building. When the council allowed Tesco to build a massive supermarket at Cables Retail park it is as good as sounded the death knell of Prescot town centre. (5.156) Broadly agrees with our assessment.

5.157 By reducing the level of certainty that the policy would support investment in Prescot town centre, these proposed amendments mean that there is also a lower level of certainty that the revised policy would have a major positive impact on the objective that relates to protecting and enhancing Knowsley's built heritage.

Not proved

5.159 There are no anticipated negative effects on the sustainability objectives. The proposed modifications would not however prevent the policy from having an uncertain impact on the objective relating to mitigating climate change

Not proved. Agrees with earlier points that state the policy 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 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 21st century, particularly as we all face the prospect of climate change. The demand on energy, water and other resources is likely to be much higher.

5.184 In addition, the removal of the requirement to achieve certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.

Once again this point is totally at odds with other statements and shows that there would be a negative effect on the objectives that relates to poverty and deprivation; and health.

33 POLICY CS24

Representations Relating to Policy CS24: Managing Flood Risk

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS24 001	1	205	David Holmes (6)
POLICY CS24 002	1	211	Deborah Rush
POLICY CS24 003	1	266	Heather Weightman, Knowsley Town Council
POLICY CS24 004	1	303	Jean Ball
POLICY CS24 005	1	306	Jean Rush
POLICY CS24 006	1	309	Jeanette Sutton
POLICY CS24 007	1	313	Jennifer Le Poidevin
POLICY CS24 008	4	364	Kirsty Meredith
		444	Nicola Meredith
		468	Paula Meredith
		94	T W Bretherton
POLICY CS24 009	1	454	Patricia McDonald-Holmes (5)
POLICY CS24 010	1	475	Peter Bate
Total	13		

**Knowsley Local Plan: Core Strategy
Proposed Modifications - Consultation
Representations Form**



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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	David Holmes	
Job Title (if appropriate)	Designer / Lecturer	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

David 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.

- 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 may 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.
- **“There is also likely to be an increase in the proportion of rain falling in heavy storm events. Over time these changes will increase and the magnitude of these changes will be greater with higher global greenhouse gas emissions.”** *Climate Change Adaptation Manual, www.naturalengland.org.uk*

you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Your evidence collated from Capita Symonds already indicates the flood risk zones and now you as a council need to realize the consequences of possible dwellings on this land in South Whiston.

Flood zones defined by NPPF.

Please refer to document web addresses and quotes detailed below:

"5.1.9 There are a number of major infrastructure routes within the Borough of Knowsley; the following key points should be noted:
The A5300 south of Junction 6 of the M62/M57 crosses Flood Zone 3 associated with Dog Clog Brook;
http://www.knowsley.gov.uk/pdf/EB15_StrategicFloodRiskAssessment-Level2.pdf

'Knowsley has 263 ha of land in Flood Zone 3 (land with a probability of flooding on average more than once in 100 years), and a further 168 ha of land in Flood Zone 2 (land with a probability of flooding on average between once in 100 and once in 1000 years). The majority of land that is at risk of flooding is in the Green Belt. Climate change may lead to an increase in areas liable to flood.' Source: <http://www.knowsley.gov.uk/pdf/KnowsleyAMR2011Final.pdf>

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 13 Nov 14

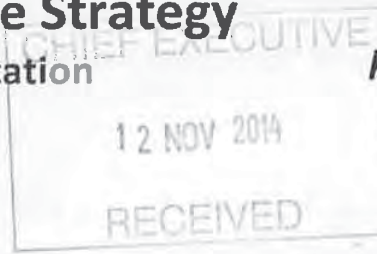
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Proposed Modifications - Consultation

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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	MISS	
Name	Deborah Rush	
Job Title (if appropriate)	Community nurse	
Organisation (if appropriate)	SRP.	
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 Deborah Rush.

1. To which **proposed modification to the Core Strategy** does this representation relate?

Modification Ref Policy Ref KGBS14 Paragraph Ref E3

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input 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.

Flooding 2007 was extensive and there are a lot of economic costs to this. Climate change will see more extensive flooding and the (Perra 2009) 110 hectares of Greenbelt in Whistler is a soak for the surrounding areas.

Rain fall in storm conditions will seriously challenge the ability of main drains (ADS1, MMD-321747-D-SK-00-xx-0001) to handle excessive downpours. Distract possibility of M62 flooding. Development at Cranston would not be able to take any further rainfall - being lower. Continue on a separate sheet if necessary...

Also - Character of small village would disappear including wildlife on precious green belt - once gone never to return.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Increase in pollution - already excessive due to numerous motorways and major roads - if more housing built.

Lack of local facilities/amenities in area
This was always a beautiful area -
no one in council appears to understand
or do they care about the importance
of green areas for people?
Do not build!

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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 TOWN COUNCIL

RESPONSE

MODIFICATIONS TO LOCAL PLAN RELEASE OF GREEN BELT LAND

Knowsley Metropolitan Borough Council's proposed modifications to the Local Plan regarding the early release of green belt land within the borough of Knowsley was considered by Knowsley Town Council on 27 October 2014.

Following consideration, Knowsley Town Council **UNANIMOUSLY RESOLVED** that it is totally opposed to the early release of green belt land for the following reasons:

- It would have a detrimental effect on the social infrastructure, especially in Knowsley Village. Any future development would have a negative impact on transport and public amenities.
- Knowsley Town Council believes there are sufficient brownfield sites within Knowsley to accommodate future development.
- Knowsley Town Council is totally opposed to the reduction in affordable housing target from 25% to 10%.
- Part of the parcel of green belt land in Knowsley Village, identified for release within the plan contains an area of designated public open space, leased by Knowsley Town Council, therefore this area cannot be used for future development.
- Knowsley Town Council believes that the proposed modifications of the Local Plan may compromise Knowsley Metropolitan Borough Council's flood risk assessment.
- Knowsley Town Council believes that the early release of green belt land for development contained within Knowsley Metropolitan Borough Council's Local Plan contravenes the National Planning Policy Framework on protecting green belt land, as follows:

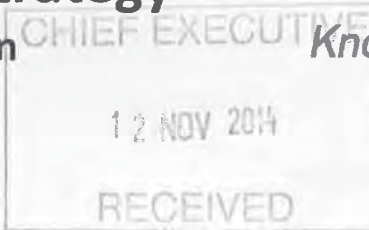
Paragraph 83: Local authorities with green belts in their area should establish green belt boundaries in their Local Plans. Once established, green belt boundaries should only be altered in exceptional circumstances having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Knowsley Town Council feels that the reason for the early release of green belt land in Knowsley is not an exceptional circumstance.

Paragraph 89: Local planning authorities should regard the construction of new buildings as inappropriate in green belt boundaries. Knowsley Town Council feels that any future development, especially in Knowsley Village, would be inappropriate as it would impact on the historic character and outstanding natural beauty of the area.



Knowsley Local Plan: Core Strategy

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	
Name	JEAN BALL	
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

JEAN BALL

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KGB 514

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.

Extensive inland flooding in 2007 focussed 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 as a sink for surrounding areas. The increased rainfall in storm conditions (see below) will seriously challenge the ability of the existing main drains 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 the proposed development at Cronton (which is a certain area is lower than Whiston) ~~which~~ would not be able to take any 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.

If these plans go ahead we will need more schools and doctors surgeries. Whiston village is already congested at peak times so there would need to be more main roads out to access other areas. The only plus side might be to improve local bus services, which at the moment are absolutely abysmal. People are bothered about pollution from cars (you are lucky if you own one) and all the extra traffic from the motorways

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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

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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		

**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 JEAN RUST

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

K9 B514

Policy Ref

Paragraph Ref

E3

2. Do you consider that the proposed modification is...? (please tick relevant box)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

THERE IS A distinct possibility that the M62 could flood if such a long area of the green belt is covered in concrete. Also the proposed development at Croxtone (which is lower in certain areas) and would not be able to take any surplus rainfall. Climate change is already causing heavy flooding especially in winter. At present the 110 hectares of Whiston green belt act as a soak for surrounding areas. The increased rainfall will seriously challenge the main drains. The previous resource need to 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

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Signature



Date 1-11-14

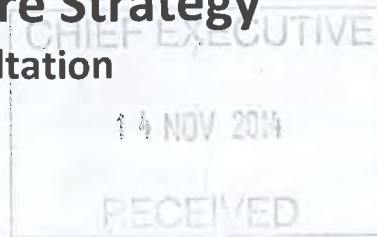
Knowsley Local Plan: Core Strategy

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	JEANETTE SUTTON	
Job Title (if appropriate)	Housewife. SUPPORT	
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.

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 as a sink for the surrounding Areas. The increased rainfall in storm conditions will seriously challenge the ability of existing main drains (A05 map MH0-321747D-SK-00-xx-0001) to handle such downpours.

There is a need to consider the impacts of flooding risk. There is a distinct possibility that the M62 could flood if such a large area of Green Belt is put under concrete.

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...

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5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date 10.11.2014.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MS	
Name	JENNIFER WE POIDEVIN	
Job Title (if appropriate)	CLINIC HYGIENIST	
Organisation (if appropriate)	N.H.S.	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

JENNY HE POIDEVIN

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

SURZA

Policy Ref

KGBS14

Paragraph Ref

E3

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

When I purchased my property on the park it was for the open aspect and to enjoy the wildlife and privacy the park gives me. Green Belt should be the last resort. Extensive Inland Flooding in 2007 focused attention on the economic and human costs of Flooding (PM 2008) climate change is already causing heavier down pours especially in winter a trend that is project to persist and increase flood risk (defra 2009) at present he 110 hectares of green belt in Whiston acts as a safe for surrounding areas. The main drains (ADSI, map MMD-321747-D-SK-00-XX-000) to handle such down pours. There is a distinct possibility that the MBZ could flood if such a large area of green belt is put under concrete, added to this the proposed development at Cronton (which in certain areas is lower than Whiston) would not be able to take surplus rainfall.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Carry out an up to date housing requirement survey taking into account the latest figures from the office of National Statistics.
Carry out a relevant Traffic Management survey taking into account the existing loads at peak times and the additional loads placed upon the area with an influx of at least 2200 vehicles.
Insist that empty properties and brown field sites are developed before considering Green Belt release
Put back any Green Belt release until end of plan period and even then consider all other areas, green belt release should be the last resort not the first action

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature



Date

1-11-14



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	K Meredith	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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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.

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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 13/11/14

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 12th century (Merseyside Historic characterization Project, 2011). The loss of this natural landscape held within the very last of the Green Belt in South Whiston would see the complete eradication of all the historic character that currently remains. The heritage of South Whiston would thus be lost for all current and future residents.
- Whiston is a ‘village’ with a village community. The proposed development would eradicated 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.</p> <p>It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward.</p>
---	--

Objections:

- The protection, enhancement and management of the remaining area of ecologically isolated green belt will be rendered a belated and insufficient attempt to restore/protect/fix what has already been lost.
- Ecological dispersal and colonization of protected and endangered species will be prevented via fragmentation of vital habitat networks; inadequate dispersal of species will cause a local and regional extinction of nationally significant and endangered species. (Harrison and Bruna, 1999)
- Agricultural land adjoining Big Water and Old Wood is currently providing essential refuge for nationally endangered, red listed grey partridge, a victim species that relies on farming systems for its food source and habitat. (RSPB, 2014). There is a significant population throughout the agricultural land surrounding Big Water and Old Wood. Nationally 87% of the population of grey partridge has been lost since the 1970's, a direct result of habitat fragmentation and loss. It can be expected to deteriorate further owing to the potential loss of the agricultural green belt of South Whiston.
- The agricultural land adjoining Big Water and Old Wood provides refuge and food source for sky lark which has reduced nationally in population by 62%, overall farmland bird species which have reduced by 56%, and lapwings which have fallen in population by 76% since the 1970's (RSPB, 2014). This land is also the hunting, nesting and breeding grounds of buzzards and barn owls the numbers of which will be directly and severely impacted by the loss of the agricultural green belt in South Whiston. So too the population of their prey of field mice, voles and rabbits.
- Impact of human activity upon the remaining area of Greenbelt, i.e. Big Water and Old Wood after development has taken place would have a detrimental effect upon the quality of natural habitats and upon all local species. Increase in human population in addition to the close

proximity to the remaining Greenbelt will further degrade the natural environment as a result of vandalism and overall human impact.

- Without sufficient connectivity of green corridors the isolated patches of Greenbelt will suffer a loss of biodiversity and environmental quality. Current natural linkages connecting Stadt Moers to the South Whiston Greenbelt would be disconnected by the proposed development, preventing colonization and migration of species.
- Migrating water fowl e.g. Swans, Canadian Geese, Coots, Moorhens, Herons which frequent big water will diminish due to the encroachment of urban sprawl. This will have a detrimental effect upon the quality of Big Water fresh water habitat as they naturally manage the fresh water habitats.
- Had a full ecological and habitat survey been undertaken by KMBC it would have established, in summary, that the urban fringe woodland of Old Wood and Big Water, and supportive agricultural land, all within the green belt of South Whiston, was essential to the conservation of the abundance of wildlife and thus their sustainable future.

<p>E3. To adapt to climate change including flood risk.</p>	<p>The Strategic Flood Risk Assessment identifies that a small part of the southern section of the site is at risk of fluvial flooding. This risk of flooding will be exacerbated by climate change and this part of the site should only be considered for development as part of a sequential approach. It is recognised that the identified capacity of the site has been derived from the assumption that the portion of the site within Flood Zones 2 and 3 will be excluded from the developable area and unless this is the case, and the other identified mitigation measures are implemented, the proposals could have a negative impact on the objective and its sub-objective of reducing flood risk.</p> <p>The Preliminary Flood Risk Assessment indicates that the site also falls within an area that is susceptible to ground water flooding. Nevertheless, the PFRA does recognise that there is a lack of local information in relation to groundwater flooding and that the dataset used only identifies wider areas that may be at risk from groundwater flooding. Accordingly, the information on groundwater flooding is caveated by the acknowledgement that only isolated locations within the overall susceptible area are likely to suffer the consequences of groundwater flooding. Nonetheless, the proposals would result in a significant area of greenfield land being replaced with built development which may have an adverse impact on levels of surface water run-off if suitable measures are not implemented, such as sustainable drainage systems.</p> <p>The proposals would also result in the loss of a greenfield site that has the potential to provide habitat for species and help mitigate higher summer Temps associated with climate change.</p>
---	---

Objections:

- Extensive inland flooding in 2007 focused attention on the economic and human costs of flooding (Pitt, 2008). Climate change is already causing heavier downpours, especially in winter, a trend that is projected to persist and increase flood risk (Defra, 2009). At present the 110 hectares of Green Belt in Whiston acts a soak for surrounding areas, The increased rainfall in Storm conditions(see below) will seriously challenge the ability of the existing main drains (AD51, map MMD-321747-D-SK-00-XX-0001) to handle such downpours. There is a distinct possibility that the M62 could flood if such a large area of Green Belt is put under concrete. Added to this the proposed development at Cronton (which in certain areas is lower than Whiston) would not be able to take any surplus rainfall.
- Properties in Foxshaw Close and Windy Arbour Close and the Green Belt to the rear of these properties are on a very high water table. These properties had to install extra drainage following the development of the Lickers Lane estate in the 1970's as water levels rose and caused flooding to property foundations. Clear spring water was found beneath floor boards which had to be drained in order to prevent subsidence of the properties and to prevent rising damp.

- Further development of the Green Belt to the rear of the properties will further impact the high water table and increase the probability of flooding to these properties and surrounding properties.
- No indication has been given as to the capacity of United Utilities to provide water treatment and sewage treatment, at the local water treatment works, for the proposed development.

<p>E4. To mitigate climate change including using energy prudently and efficiently and increasing energy generated from Renewable sources.</p>	<p>Each of the options would inevitably result in some carbon emissions and could therefore have a negative impact on the objective and its sub-objective. Other policies in the Core Strategy are likely to ensure that all new development is designed in a way to maximise energy efficiency and it is recognised that the proposers of the site have stated that the site may offer opportunities for decentralised energy systems due to the quantum of development proposed. It is however recognised that there is presently no certainty that such systems would be incorporated into the proposals for the site and it is noted that the Knowsley Renewable and Low Carbon Energy Options study (2009) considered that a purely residential development of the area would be unlikely to readily lend itself to a district heating opportunity. In addition, the site is not located within a ‘Priority Zone’ for renewable and low carbon energy as identified by the Liverpool City Region Renewable Energy Capacity Study (2009) and it is therefore unlikely to deliver a reduction in carbon emissions beyond those required by Local Plan policies. The proposals are likely to result in an increase in traffic in the immediate surrounding area. It is however noted that there are a range of local facilities and amenities that are readily accessible from sections of the site including primary schools, a GP and health centre and a local shopping centre on Greene’s road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opposite side of Windy Arbor Road and Huyton Business Park which may reduce the need to travel for work. Furthermore, both Options 1 and 2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, and taking into account the scale of development that would be likely to come forward on the site, it is considered that each of the options have the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of onsite facilities.</p>
--	--

Objections:

- It is quite clear that the development of Green Belt in Whiston will have an overall negative effect on the aim to mitigate climate Change. The Sustainable and Low Carbon Development (5.183 SD32. CS22) removal of the developers need to meet the Sustainable homes/BREEAM standards will increase energy usage.
- The increase in Traffic in the area will increase carbon emissions and have a detrimental effect on Air Quality.
- The Industrial Estate mentioned on Windy Arbor Road has little effect on employment as the few factories that are occupied, have no need for more workers.
- There is also an acceptance that this development will not be suitable for energy generated by renewable sources. In addition, the removal of the requirement to achieve a certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.
- “The need to build more sustainable housing with a limited supply of land means that innovation is necessary but working towards sustainable communities relies on more than the achievement of zero carbon housing; its success will also be determined by the selection of appropriate locations for development”, Neil Williamson FLI, President Landscape Institute

<p>E5. To provide, conserve, maintain and enhance green infrastructure.</p>	<p>Although Options 1 and 2 would support the retention/provision of some areas of public open space, each of the options would result in the loss of substantial area of greenfield land which offers the potential to function as part of the Borough’s Green Infrastructure network and it is considered that each of the options would have a negative impact on this objective due to the area of greenfield land that would be lost. It is however acknowledged that there is only a low level of certainty over this impact of Options 1 and 2 on the objective due to their potential to retain areas of public open space & increase the quality of the accessible green infrastructure network. By contrast, there is a higher degree of certainty that Option 3 would have a negative impact on this objective as it would not offer the same level of protection to areas of Public Open Space.</p>
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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 & a local shopping centre on Greene’s Road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opp side of Windy Arbor & Huyton Bus Park which may reduce the need to travel for work. Nevertheless, these community facilities are some distance from the eastern and southern sections of the site and only the northern sections of the site are within 800m of Whiston railway st & not all of the site is in close proximity to the existing bus routes on Windy Arbor & Lickers Lane. The proposer of the site has also stated that the proposals would include on-site facilities, the provision of new bus routes through the site and that the development would be designed to encourage walking and cycling. Both Options 1 &2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, due to the number of trips that a development of this scale would be likely to generate, it is considered that each of the options has the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of on site facilities.</p>
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Objections:

- It is highly unlikely that a development of over 1500 houses would improve air quality especially if you take into account the level of traffic increase. The suggestion that walking to Greenes Road is an option for a non car owning elderly or young person in winter is a non-starter. Bus services are poor in Whiston at best and non-existent after 8pm at the southern end of Windy Arbor Road.
- “Our farmland and countryside can produce high-quality food and support wildlife when trees play a part in the landscape. We all breathe easier when there are beautiful woods in which to

relax and unwind. And yet the UK needs more trees. We are one of the least wooded countries in Europe and trees and woods continue to disappear from our landscapes”. *Woodland Trust*

- There is a need to reduce the need to travel by car and increase the use of more sustainable forms of transport. Economic activity rates and incomes are lower in Knowsley than the NorthWest average.
- There is a need to retain a greater proportion of retail expenditure within Knowsley to enhance the vitality and viability of the Borough’s town centres.
- 2 of the 15 conservation areas in Knowsley are included on the latest Heritage at Risk register;
- Access to areas of natural and semi-natural open space is poor in parts of the Borough;
- There is a need to conserve and enhance the natural environment recognising the importance of biodiversity.
- There is a need to secure and promote increased energy efficiency and renewable energy sources;
- There is a need to promote and secure more sustainable waste management.
- There is a need to consider the impacts of flooding and flood risk;
- The re-use of land should be promoted to minimise the take-up of greenfield land.

Source: Sustainability issues were derived from the baseline data gathered in 2008 – 2009 to inform the SA SD07 Scoping Report, Knowsley council

None of the Knowsley MB goals, above, will be achieved by releasing Green Belt.

“Air pollution is currently estimated to reduce the life expectancy of every person in the UK by an average of 7-8 months. The measures outlined in the strategy could help to reduce the impact on average life expectancy to five months by 2020, and provide a significant step forward in protecting our environment.” DEFRA The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

<p>E9. To use water and mineral resources prudently and efficiently.</p>	<p>Each of the options is unlikely to have any significant effects on the objective.</p>
--	--

Objections:

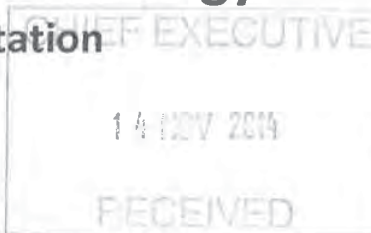
The objections would be largely in line with those made against E7 as follows:

- It is critical that this precious resource is managed properly to ensure that the needs of society, the economy and wildlife can be met and maintained in the long-term.
- Surrounding Big Water Lake with a vast housing estate of over 1500 houses must surely impact on the quality of water in the local area.
- The lake in this area is used for recreation and fished regularly by a local club, it is considered “Good Fishing” one of its advantages is its rural location. We have seen no mitigation of negative effects on water, suggested by Knowsley Council.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mrs	
Name	Patricia McDonald-Holmes	
Job Title (if appropriate)	Printmaker Artist / Teacher	
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

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

4. If you are objecting to the modification please set out how you consider it should be changed to make 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.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

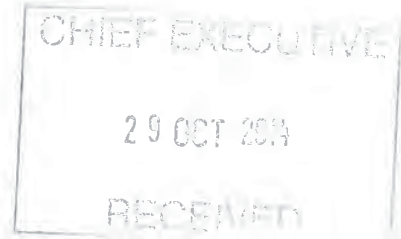
- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

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



23rd October, 2014.
Ref; Local Plan Modifications



Local Plan Team,
Knowsley MBC,
1st Floor Annexe,
Municipal Buildings
Archway Road,
Huyton,
L36 9YU.

Knowsley Council's Local Plan

Dear Mr. Jonathan Clarke,

Thank you for your e-mail response to my letter dated October.

I am still concerned that you have yet to offer a guaranteed confirmation of compensation for anticipated flood damage and inconvenience or that you have informed the Developer or Building Planning or Control departments.. I feel that you have yet to give a convincing description of your solutions to other aspects of my observations.

I feel that you should distribute your affirmation of your acceptance of your responsibilities to the citizens of Knowsley, for insurance purposes, by the usual methods. Also, indicating that such costs paid by your Council will not come from taxes.

Have you informed your insurers that you intend to accept the consequences for deliberately building on a probable flood plane?

I assume you will give the people of Knowsley an opportunity to peruse the plans produced so opinions can be expressed.

I look forward in anticipation to your response.

Yours sincerely,

A solid black rectangular box used to redact the signature of Mr P. R. Bate.

Mr P. R. Bate.

34 POLICY CS25

Representations Relating to Policy CS25: Management of Mineral Resources

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS25 001	1	88	Rachael Bust, The Coat Authority
Total	1		



The Coal
Authority

Knowsley Local Plan Core Strategy (Proposed Modifications)

Consultation Deadline – 13 November 2014

Contact Details

Planning and Local Authority Liaison Department
The Coal Authority



Planning Email:
Planning Enquiries:



Person Making Comments



Consultant Planning Advisor to The Coal Authority

Date of Response

24 September 2004

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Rachael Bust	
Job Title (if appropriate)	Chief Planner	
Organisation (if appropriate)	The Coal Authority	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
a) Legally Compliant? (see guidance note 2.2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Sound? (see guidance note 2.3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Coal Authority supports this modification

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

N/A

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

Signature

[Redacted Signature]

Date 24 September 2004

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

The Coal Authority

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M225 (PM71)

Policy Ref

CS25

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|--------------------------|
| c) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Sound? (see guidance note 2.3) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness 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

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| e) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness 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

35 POLICY CS27

Representations relating to Policy CS27: Planning and Paying for New Infrastructure

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
POLICY CS27 001	1	204	David Dickinson, Highways Agency
POLICY CS27 002	1	113	Jenny Hope, United Utilities
POLICY CS27 003	1	105	Matthew Dugdale, Emerson for Orbit
POLICY CS27 004	1	502	Ross Anthony, Theatres Trust
POLICY CS27 005	1	120	Tony Docherty, Weston House
Total	5		



Safe roads, reliable journeys, informed travellers

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



An executive agency of the
 Department for Transport

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, Prescot	37	99	136	97	49	146	M57 Junction 2	20	55	74	51	31	81	-62	-65
Carr Lane, Prescot	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 polices) 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: 

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	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]	

**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 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 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.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- 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



David Dickinson

Date 12 November 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)

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

THE EMERSON GROUP

EST. OVER 55 YEARS

Planning Department

E-mail:

PLANNING DEPARTMENT

DAVID W SHORT BSc DipTP MRTPI
GRAHAM A BEE BSc DipTP MRTPI
MATTHEW DUGDALE BA MCD MRTPI
KERREN J PHILLIPS BSc
TOM LOOMES BA (Hons) DipTP MRTPI
ANGELA DC PENNY

Local Plan Team
Knowsley MBC
1st Floor Annexe
Municipal Buildings
Archway Road
Huyton
L36 9YU

Our ref: MD/Planning

14 November 2014

Dear

**RE: KNOWSLEY LOCAL PLAN CORE STRATEGY PROPOSED MODIFICATIONS,
AUTUMN 2014 – CONSULTATION RESPONSE ON BEHALF OF ORBIT
INVESTMENTS (PROPERTIES) LIMITED**

I am writing to provide comments on behalf of Orbit Investments (Properties) Limited regarding the above, which are set out on the attached, completed Representations Forms.

Orbit Investments (Properties) Limited, part of The Emerson Group, owns Academy Business Park, as illustrated by the attached Estate Plan (389-SCH-1019). The site is situated at a prime "gateway" location fronting Knowsley Industrial Park. At 10.79 hectares in size, it provides a key opportunity to contribute to the local economy through the adaptation of existing buildings and creation of new build premises fit for modern business needs.

Orbit's view is that the Local Plan Core Strategy with the Proposed Modifications is largely sound, subject to the changes requested in the attached Representations Forms. These objections relate to the location of the proposed "Services Hub" in Policy CS11 and the viability of sustainable and low carbon development in Policy CS22.

I would be grateful if you could confirm receipt of the attached comments. Should you wish to discuss any of these points in further detail, please do not hesitate to contact me.

Yours sincerely,

Matthew Dugdale
Planner

Enc. Proposed Modifications Representations Forms (Autumn 2014)
Estate Plan (389-SCH-1019)

DIRECTORS: PE JONES OBE (CHAIRMAN) ME JONES (DEPUTY CHAIRMAN)
AE JONES ACWEATHERBY BA (Law) (SECRETARY) J EDWARDS BSc (Hons) FCMA CGMA (FINANCIAL)
SP WILSON JP BURGESS BA (Hons) Law MST ROYLE BA (Arch) JR CLABER BSc (Hons)
NON-EXECUTIVE DIRECTORS: AJ WHITE BEng A JONES THE LORD LEE OF TRAFFORD DL FCA JP ALLEN ACIB DipFS
EMERSON DEVELOPMENTS (HOLDINGS) LTD

REGISTERED OFFICE

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title		Mr
Name		Matthew Dugdale
Job Title (if appropriate)		Planner
Organisation (if appropriate)	Orbit Investments (Properties) Limited	
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 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.

Orbit support the reference to Lees Road as a “gateway” location, as requested in comment #1105 (December 2012).

4. If you are objecting to the modification please set out how you consider it should be changed to make 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

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

14/11/2014

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 type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Orbit agree with the need for a Local Service Centre (or "Services Hub") at Knowsley Industrial Park. However, as previously stated in comment #1105 (December 2012), there is little justification for a local service centre to be located specifically at South Boundary Road. An application (11/00055/OUT) for mixed use development at the junction of South Boundary Road and Hornhouse Lane, including 1,115 sqm of commercial floorspace (use classes A1, A2, A3, A5 & D1), was refused by the Council 19th October 2011 for 3 reasons including: a detrimental impact on the viability and vitality of Kirkby Town Centre and loss of employment land without any regeneration benefit. As such, the policy as worded is not justified or effective.

Therefore, Orbit request that the location of the "Services Hub" be delegated to the Local Plan Site Allocations and Development Policies document, in order that full consideration can be given to suitability, availability and viability of sites. This is the approach taken by Policy CS6 (Town Centres and Retail Strategy) and reflective of NPPF paragraph 23, which should be mirrored by Policy CS11.1(d) in order to ensure consistency in approach across the Plan.

Academy Business Park, as identified on the attached Estate Plan (389-SCH-1019), could provide a suitable location for small scale shopping and services to serve the needs of the workforce. This would be a sustainable location which is highly visible, accessible and more sequentially preferable than the South Boundary Road site. In addition, the site currently benefits from implemented planning consents for a petrol filling station and drive-thru restaurant (04/00275/FUL & 04/00276/FUL), which are compatible uses to serve the needs of local businesses on the Park. The provision of such uses at the southern end of the site would not prejudice the wider redevelopment of the site for B8 warehousing and distribution.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make 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 text in Policy CS11.1(d) should be re-worded to remove specific reference to South Boundary Road and be replaced with a more generic location that can be defined by the Allocations and Development Policies document and Policies Map, as follows:

"d. A local service centre (or "Services Hub") at ~~South Boundary Road~~ A5208 County Road South/South Boundary Road/Moorgate Road/Arbour Lane/Lees Road, to provide small scale shopping and services to serve the needs of the workforce within the Park, will be defined on the Policies Map by the Local Plan Site Allocations and Development Policies document".

The last bullet point of paragraph 6.27 would also need amending accordingly.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and 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

14/11/2014

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Orbit Investments (Properties) Limited

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M210

Policy Ref

CS22.5

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|--------------------------|
| e) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Sound? (see guidance note 2.3) | <input 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.

Orbit support the removal of part 5 of the policy relating to Sustainable Construction Targets.

4. If you are objecting to the modification please set out how you consider it should be changed to make 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

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and 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 14/11/2014

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 checked="" type="checkbox"/>	<input 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.

Policy CS22 needs to include reference to the viability of delivery of sustainable and low carbon development.

Flexibility is required so that delivery of this policy does not make schemes unviable.

4. If you are objecting to the modification please set out how you consider it should be changed to make 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 stated in comment #1105 (December 2012), Orbit request that the words "and/or viability" be inserted after the words "subject to feasibility".

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and 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 14/11/2014

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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| j) 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.

Orbit support the removal of the last sentence from part 6 of the policy relating to the payment towards independent scrutiny of submitted viability evidence.

4. If you are objecting to the modification please set out how you consider it should be changed to make 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

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and 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 14/11/2014

From: Ross Anthony [REDACTED]
Sent: 12 November 2014 12:04
To: [REDACTED]
Subject: Proposed Modifications to the Local Plan: Core Strategy, Draft Supplementary Planning Documents and Draft Local Development Order

Follow Up Flag: Follow up
Flag Status: Flagged

12 November 2014

Knowsley Metropolitan Borough Council
PO Box 26
Municipal Buildings
Archway Road
Huyton
Merseyside L36 9FB

Our Ref.: C/6139

Core Strategy Main Modifications

Thank you for your email of 19 September consulting The Theatres Trust on the proposed main modifications to the Knowsley Local Plan Core Strategy Document.

Remit: The Theatres Trust is The National Advisory Public Body for Theatres, safeguarding theatre use or the potential for such use; we provide expert advice on theatre buildings including, new design, heritage, property and planning. Established by The Theatres Trust Act 1976, the Trust delivers statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2010 (DMPO), requiring the Trust to be consulted on planning applications 'involving any land on which there is a theatre'.

The Trust supports proposed modification M231 to *Policy CS27 Planning and Paying for New Infrastructure*, however we would recommend the following wording to provide additional clarity:

2. Proposals for new development will be required to demonstrate that any negative impacts the development may have on the improvement or replacement of existing infrastructure or on the provision of new infrastructure will be avoided and/or appropriately mitigated as part of the planning process.

This will support the provision and protection of cultural infrastructure and reflect item 70 of the National Planning Policy Framework.

*** Please note that Rose Freeman has retired from The Theatres Trust. Please refer future planning correspondence to [REDACTED]

Regards,

Ross Anthony
Planning Adviser

[REDACTED]

www.theatrust.org.uk

[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 Reprs Doc..docx

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

I enclose here with the following documents in respect of the above, –

1. The Representations Form, and
2. The Representations Statement

Both are given in PDF format. The signed originals will follow in the post tonight.

Please confirm receipt of documents. Thank you.

Kind regards,

Tony

Tony Docherty

ATD
Specialties Limited

[REDACTED]

www.atdspecialties.co.uk

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	
Name	TONY DOCHERTY	
Job Title (if appropriate)	LANDOWNER	
Organisation (if appropriate)	n/a	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

PLEASE SEE ATTACHED REPRESENTATIONS STATEMENT

Continue on a separate sheet if necessary

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

PLEASE SEE ATTACHED REPRESENTATIONS STATEMENT

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

12/11/14

Weston House

Representations in respect of the Proposed Further Modifications to the Submission Document of the Knowsley Local Plan: Core Strategy September by the Owners of Weston House Representation Reference 128/1220

This Statement is in response to the Further Proposed Modifications to the Submission Document of the Knowsley Local Plan: Core Strategy published in September 2014. The objections are shown sequentially in accordance with the Modification Reference shown in the document and call into question the rationale of the Council in determining the proposed modifications to the Submission Document as well as the implications of modifications to a Local Plan which, as far as Housing Provision during the Plan period is concerned, particularly in the first five years, we contend is fundamentally un-sound. The views expressed in this Statement are those of the Owners of Weston House.

Our Objections to the following Proposed Modifications are as follows: –

1. MO 12. Paragraph 1.2 8A

We contend that Planning Policy Guidance has not been strictly followed in the making of the Local Plan insofar as the acceptance by Knowsley that their housing number projections were substantially wrong, has meant that, in order to achieve the correct housing numbers, the Local Plan would have to be significantly altered. This, in turn, meant immediately abandoning the phasing mechanism for the release of Green Belt land which had been a mainstay of the original Plan, and as an expedient measure sanctioning the removal from Green Belt of substantial Parcels of Land without thoroughly and efficiently investigating how a significant portion of the housing number deficit could be achieved through the development of smaller Parcels of Land in the Green Belt in, including the land known as Weston House.

The Owners of Weston House had earlier informed Knowsley in the meeting which took place months before the Public Hearing commenced that, according to their Consultants, the housing numbers being projected by Knowsley were substantially inadequate. This was dismissed as being totally incorrect, and yet within the first week of the Hearing Knowsley had accepted the view of those attending the Hearing that their calculations were wrong and that they needed to not only re-calculate the housing number requirement, but make Modifications to the Plan which addressed the issue of how the new numbers could be achieved, and the only way to do this was to abandon completely the original Plan with regard to housing and create a new Plan. In our view expediency and time constraints resulted in not enough attention being paid to Planning Policy Guidance, or if attention was paid then it was simply ignored. This is not the proper way to develop and adopt a sound Local Plan.

2. MO15. Paragraph 1.36

Significant points were raised by us in relation to Planning Policy Guidance, the NPPF, and the important issue of the Green Belt, in that Consultation and the subsequent Representation but these

Representations in respect of Further Modifications to the Submission Document November 2014

appear to have simply been ignored. The views expressed by our Consultants were based on their own professional expertise, wide-ranging experience over many years including advising on the matter of urban fringe Green Belt, as well as attendance at many other Local Plan Examination Hearings, and yet these professional opinions and judgement appear to have counted for very little.

3. MO22. Paragraph 1.43

We contend that the Risks to the delivery of the Housing Trajectory Projections for the 15 year period have not been properly addressed. The relatively brief period of time in which the original phasing mechanism for the release of Green Belt has been completely abandoned, and justifiably so, has meant that there has simply not been enough time to give proper consideration to the effect on both Knowsley and Landowners/Developers of moving from 'famine' in the first five years to 'feast' in the same period, in terms of Development potential. All sorts of issues may arise - Landowner Intentions, Availability of funds for Development, the Business environment, Political issues, Infrastructure implications and costs, and of course, last but not least, the issue of Developer Contributions. The Housing Trajectory numbers in the first five years rely heavily on the SHLAA sites many of which have been available for years with Knowsley being unable to persuade Developers to take them on, and the new Sustainable Urban Extension sites, and in particular three very large sites. We are heading towards the end of the second year of the Plan period, and it does not take a great deal of imagination to envisage issues, problems, hold-ups, disputes on the part of both sides which are likely to ensure that the projected housing numbers for the first five years will not be achieved.

4. MO30. Paragraph 2.15

Following on from the above, we have in this paragraph a clear admission from Knowsley of their very poor historic record of Net Completions in the period 2002/3 to 2012/13 -an average of 189 per annum, and yet we are asked to believe that in the remaining three years of the first five-year part of the plan more than 1000 houses per annum will be constructed. That seems to us highly improbable, and, as a result we cannot understand the reluctance of Knowsley to include the smaller Additional Reserve sites, including Weston House which are available, in single ownership, and deliverable within a very short period of time. It appears to us that the main reason for this is the decision by the Inspector, in his Findings following the initial Hearing, that Knowsley did not need to consider such sites. This, in our view, appears to have been taken by Knowsley as a strict instruction rather than either an observation or a piece of advice. No explanation for the Inspector's Finding has ever been proffered by the Inspector to date, and therefore it has been impossible to present a cogent argument to Knowsley to gainsay the Inspector's decision. This is unreasonable and inequitable. Without a stated reason, it must be assumed that the Inspector believes that the combination of developable land for housing from the SHLAA sites and the SUE land parcels provide Knowsley with the potential to construct their target number of houses in the Plan period, and that therefore the inclusion of smaller sites like Weston Park is unnecessary. We believe that this opinion, if it is correct, does not take into account the significant difficulties which may be encountered during the Plan period in bringing the development of the SUE sites, particularly the three very large sites, to fruition. Nor does it take into account the fact that, currently, Knowsley do not have a five-year supply of land to achieve the housing numbers needed in this period. We take the view that the intention of Knowsley to make up any shortfall in this period, during the remainder of the Plan

period is facile and disingenuous, given the long history of poor completions referred to earlier. On this basis, we believe the Plan, as it stands is not sound, and that further review is required.

5. MO57. New Paragraph 5.2 0A

In the Local Plan and the Supporting Documents the desire to "Re-balance the Housing Market" in Knowsley, is frequently stated, and yet the emphasis is always on the provision of Affordable and Supported Housing. In our opinion, no emphasis is given in the Plan for the development of 'aspirational' properties for the upper end of the market to support Industrial and Business activity in areas like Halewood. It is important, if possible, to encourage the owners, executives, managers and senior personnel of the businesses which are based in Knowsley or close to it, to actually live in the area. To do that, Knowsley need to facilitate the building of appropriate houses, and yet one imagines that the great majority of the senior figures who make their living in Knowsley depart at night for the leafier parts of Cheshire or West Lancashire, in part, at least, because there are very few, if any, developments which might satisfy the needs of those individuals or their families in Knowsley. We believe that Knowsley lose out in this respect, and will continue to do so, because such developments help to raise the bar in terms of social and economic development, but if they do not exist or are not encouraged, then no benefit is gained. Knowsley were very happy to allow the development of the Everton Football Club Training Facility at Finch Park, and yet we have to ask ourselves how many of the very highly paid young men who attend there every day have ever considered buying a house in close proximity to Finch Farm? The simple reason for this is that there are no suitable properties, and so these individuals purchase their homes in the Wirral, Cheshire or in the Formby/Southport areas. The Weston House site, with its woodland setting, has been described by the major Developers who have visited the site and who are interested in it, as perfect for that type of development.

6. MO60. Knowsley Housing Trajectory.

We contend that the figures used are understated and that therefore the trajectory is incorrect. In a previous Representation made to the Re-convened Hearing July 2014, we estimated that the final five-year housing requirement was 3592, taking into account the backlog of 743 houses and the 20% Buffer required by the NPPF for Local Authorities with a consistent track record of poor completions. According to their own trajectory, Knowsley estimate that even if they remain on target during this first five-year period, which seems highly unlikely, they will construct approximately 2800 houses, a shortfall of 792 houses which means that the current backlog is, in effect, being carried forward by design into the second five-year phase of the Plan. This position appears to have been accepted by the Inspector. However the council cannot say, in our opinion, that it is impossible to deal with the requirement to deal with any backlog within the first five years of the Plan period, as required by the NPPF "**where possible**" (our emphasis) whilst refusing to consider the smaller Green Belt sites such as Weston House. Although it is currently in the Green Belt, the full analysis submitted by Weston House shows the site does **not** have a critical role in fulfilling the purpose of including land in the Green Belt and could be developed without any significant impact on the integrity of the Green Belt or its ability to perform the role for which national Green Belt policy was created. The Core Strategy is substantially changing the Green Belt extent and boundary, and is including for development many Green Belt sites which are, in some cases at least, clearly much more important to the Green

Belt purposes than Weston House. Western House meets all the tests shown in Paragraph 47 of the Framework for a site to be counted as part of the supply for the next five years.

7. MO76. Policy CS5 Clause 1

We contend that Knowsley pay deference to the NPPF (and to previous Planning Regulations and Guidance) when it suits, but appear happy to override the Framework and the previous Regulations also when it suits. For example, what were the "very special circumstances" that led to the granting of a Planning Permission in 2002 for the construction of six houses on land adjoining Weston House which is also in the Green Belt, and where the projected houses have still not been constructed, or for giving an 'In Principle' approval for the land in Bank Lane Kirby (well in advance of the site being designated as a SUE), and which we understand has now been converted to full Planning Permission? Where is the consistency, transparency and fairness with such decisions in comparison to the decision not to include smaller sites like Weston House in the Local Plan?

8. M168. New Chapter 6A Sustainable Urban Extensions

In principal, we support the creation of the Sustainable Urban Extensions, because once Knowsley had accepted that its housing numbers were substantially wrong, it became obvious that it could not rely upon the SHLAA sites alone, as it had intended, to deliver the housing numbers needed in the first five years of the Plan, and that as a result a change in strategy was needed, and this led to the creation of the concept of the SUE. There is nothing wrong with that, apart from the fact that Knowsley now appear to have adopted a doctrinal and doctrinaire approach to the selection of sites in the Green Belt for development over the Plan period, preferring to rely on larger (and in some cases extremely large) Parcels of land within the Green Belt, and have eschewed the possibility of achieving the required numbers by balancing any shortfalls from those larger sites with housing numbers on smaller sites, like Weston House which are readily available and deliverable within the first five-year period. There must be a very high expectation that some of the sites will not be developed in line with the trajectory the plan now contains, and for sure, Knowsley has not provided convincing evidence to support the view that the SUE sites are deliverable in total, and in these circumstances, we maintain that the Plan should take the opportunity presented to increase its flexibility and hence the confidence in the supply by adding further highly deliverable sites such as Weston House.

9. M243. Paragraph 10.19 Developer Contributions

We take the view that not enough detailed consideration has been given to such contributions, and the position which may arise if the developers are unable or unwilling to fund the level of contributions required by Knowsley. The only alternatives are that either Planning Permission would be refused or that the Authority will have to subsidise the development, neither of which are desirable. Part of the problem here arises from the fact that the SUE sites were not part of the original Plan, and their withdrawal from Green Belt came about as a result of the acceptance by Knowsley that their housing numbers were wrong, and that in order to comply with NPPF they would have to abandon the phasing mechanism in which these identified sites would be released from Greenbelt sometime in years 6-15 of the Plan. As a result, there has been little or no time for consultation with Developers on the matter of Developer Contributions. Setting out the types of Developer Contribution within the Plan is sensible, but getting Developers to agree such

Contributions to the level that Knowsley would like (and needs, given budget constraints) will be an entirely different matter. One can only imagine that very lengthy, convoluted and potentially acrimonious discussions and correspondence will flow between the Landowners, the Developers, and their respective Consultants and Knowsley. Reconciling the interests of individual Landowners/Developers alone, particular in respect of the larger sites, will be incredibly difficult, and this fact was clearly demonstrated at the Re-convened Hearing. Idealistically, Knowsley have settled on the idea of 'Master Planning' as the solution, which, at first glance, seems perfectly reasonable, but getting all of the different parties to agree to a Master Plan and to pay the required Developer Contribution share might prove to be a Herculean task.

At best, this will result in lengthy delays in the actual commencement of developments, particularly those on the three very large sites. At the very worst this position will inhibit the development of some of the SUE sites to the extent that it is likely that, once again, Knowsley will succeed in having a much lower level of completions than the Plan requires. It is acknowledged that even by including all of the smaller sites this position may not be entirely resolved satisfactorily, but it will be mitigated to some extent. Whereas, excluding the smaller sites completely, at least until there is a Review at the end of the five-year period at the earliest, means that Knowsley have denied themselves the additional flexibility that may be needed during the Plan period. This appears to be the triumph of rigid Planning policy over sound common sense and intelligent pragmatism.

10. Policy of KLCPS. SUE 1 (Page 102)

We question the validity of this Policy with regard to the Master Planning proposal, something not considered in the original Plan, and for which Knowsley ought to have addressed through their own Master Plan on this subject, and issued a Technical Document prior to the original Hearing. However because the housing numbers were wrong, and Green Belt land was not going to be released in the first five-year period, no real or detailed thinking has gone into this process, and this was evident from the comments and the disagreements which were voiced at the Re-convened hearing.

The term 'Development Management Process' which has a technically authoritative ring about it, has been used in this Policy by Knowsley, but there are no clear guidelines as to what this means exactly in the context of the SUE Sites. We have to question whether Knowsley have the resources and skills available for this type of complex process, and whether budgetary constraints will allow them to buy in those skills and expertise, if they do not.

We also take the view that the Key Risks shown have been substantially understated and should include:

- Infrastructure difficulties and delays (United Utilities made reference to this in a previous Representation when commenting on and welcoming the decision of Knowsley to consider the development of land owned by Utility Companies)
- The unwillingness of Landowners/Developers to meet the expectations of Knowsley with regard to Developer Contributions
- The implications flowing from this in terms of subsequent delays, financial restrictions (on both sides) and failure to deliver the required housing.

Furthermore, we fail to see how 'Clarification that areas falling outside the SUE's remain in the Green Belt and are subject to Policy CS5' mitigates the Risks to the Policy. In our opinion, such an inflexible approach actually exacerbates the Risks to the Policy, unless, of course, one views the Policy as sacrosanct in itself, rather than acknowledge the reason why the Policy was created, which was to ensure that the required number of houses for the Plan period are delivered.

This is yet another indication that there is an unshakeable conviction on the part of Knowsley that all of the SUE sites will be developed without difficulty or delay and in full during the Plan Period, which we believe is unrealistic, and that there is no need for some degree of flexibility to take into account the potential for a margin of error to upset the Plan. Any worthwhile Master Plan would always assume that things will not always go according to plan, for whatever reason, and that this should be taken into account by the Plan and be allowed for or budgeted for by the Planners. If Knowsley believe that the SUE sites will be fully deliverable without any difficulty or delay, then why identify the Key Risks to the Policy which have been shown, and which, as we have said, are incomplete anyway. To this extent we believe that Policy SUE 1 is flawed, and as it stands the Plan is therefore not sound.

11. Policy of KLCPS. CS27. Planning and Paying for New Infrastructure(Page 120)

The scale of development arising from the SUE sites and the enormous Infrastructure requirements for those sites, particularly the 3 largest SUE sites call into question the validity of Knowsley's Infrastructure Delivery Plan (M I 115) largely because of the very short timeframe which Knowsley have had in which to prepare and/or modify the IDP. Some of these developments are major projects which take a long time to plan and prepare for, and involve, not just the Authority's own technical staff, but those of the relevant Utility and Service Companies. One has to ask just how much real planning has gone into this Policy, and to question whether proper consideration has been given by Knowsley to the Key Risks which have been identified by the Authority, and to pour scorn on the Mitigation Factors presented by the Authority, which loosely translate into 'if problems arise we will be flexible in our resolution of them, and/or if the Plan is not working as we would like it to them we will change it'. In Risk Management terms these would not be considered mitigation of risk: they are simply statements which make it clear that the IDP has not been properly and carefully thought through.

Of course, the biggest risk to the IDP will be the refusal of Landowners/Developers to pay for new Infrastructure developments to the extent that Knowsley will want them to, and there is then the potential for the Authority to be held to ransom by either refusing to grant Planning Permission for all or part of these sites, in which case there will be a serious shortfall in housing numbers for the Plan period, or alternatively for the Authority to have to bear a much larger portion of the Infrastructure Development Costs than it would like or can afford. Again, if the latter is the case, then the development will not take place, and there may be a significant shortfall in housing numbers for the Plan period, as a result.

**OUR PROPOSALS TO MAKE THE PROPOSED MODIFICATIONS REFERRED TO ABOVE
CONSIDERED SOUND ARE: –**

1. MO 12. Paragraph 1.2 8A

Comply strictly with Planning Policy Guidance in terms of dealing with the Housing backlog during the first 5 Year period of the Plan, and utilise the smaller Green Belt sites to enable that to happen.

2. MO15. Paragraph 1.36

Reconsider the points which have been made by our Consultants in previous Representations, and take them on board.

3. MO22. Paragraph 1.43

Review the Risks to the Housing Trajectory Projections and mitigate those Risks by inclusion of the smaller sites like Weston House which are available for development.

4. MO30. Paragraph 2.15

Override the view of the Inspector that the smaller Green Belt sites are not needed for the 15 year Plan, and allow them to be brought into the Plan in order to give it a greater degree of flexibility and to increase the confidence in the Plan with regard to its soundness.

5. MO57. New Paragraph 5.2 0A

Re-assess the meaning of 'Rebalancing the Housing Market' so that it is not completely tilted towards Affordable and Supported Housing, but, instead, also welcomes the sort of housing which is at the other end of the scale and which is important to upgrade the character of the Borough.

6. MO60. Knowsley Housing Trajectory.

Revise the Housing Trajectory figures to show numbers which include the Housing Backlog and the 20% Buffer, and review strategy to allow the inclusion of the smaller Green Belt Sites including Weston House so that this shortfall can be dealt with in accordance with NPPF requirements.

7. MO76. Policy CS5 Clause 1

Either comply fully with NPPF and NPPG or demonstrate an even-handed approach to all Landowners with sites in the Green Belt who would like those sites to be developed.

8. M168. New Chapter 6A Sustainable Urban Extensions

Extend the number of SUE sites to include the smaller Green Belt sites which have been excluded, including Weston House in order to provide a greater degree of flexibility in the Plan to offset inevitable shortfalls which will arise during the Plan period.

9. M243. Paragraph 10.19 Developer Contributions

Recognise and accept that Developer Contributions will be a significant issue and will either create development delays or prevent development happening, and that, as result, greater flexibility in terms of sites to be developed is required, and this implies including smaller Green Belt sites such as Weston House.

10. Policy of KLCPS. SUE 1 (Page 102)

Re-state the Key Risks to this Policy to include those shown above, and modify the Mitigations to the Key Risks to exclude the idea of ensuring that other sites in the Green Belt remain available for development.

11. Policy of KLCPS. CS27. Planning and Paying for New Infrastructure .

Review the Infrastructure Development Plan to acknowledge and to take into account the fact that Planning and Paying for the required new Infrastructure for the major developments which will take place over the next 5/10 years will be a far more arduous and complex task than this Policy and the Plan indicates, particularly with regard to the issue and level of Developer Contributions. This review should be undertaken urgently, and results of the review should be taken into account with regard to other Policies and the Core Strategy itself.

36 APPENDIX D

Representations Relating to Appendix D: Core Strategy Policy Delivery Mechanisms

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
APPENDIX D 001	1	359	Keith Wooding
Total	1		



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
- 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 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.*

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 1- YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055 to
M065

Policy Ref

CS1, to CS5,
SUE

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Generally, the Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

It is disappointing that these proposals to build on Greenbelt at South Whiston have only just come to light despite claims that due consultation process has been followed. Public meetings with the Inspector should be re-convened to take into account the views of local residents in accordance with the provision of the Government in the Localism Bill.

It can be seen that the Knowsley Local Plan does not take into account the latest data from the Office of National Statistics (ONS) in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014. Furthermore, the plan, its strategy and objectives contain many conflicting and ambiguous statements, with little in the way of tangible deliverables. Often making reference to flawed and outdated supporting documentation.

Delivery of Strategic Objectives is not considered to be SMART, outputs are not 'measurable' and therefore cannot be seen as being 'achievable'. This in turn would cast doubt on the 'realistic' criteria.

On a personal note if I had submitted proposals for work, of this standard with this many grey areas, undefined & unquantified benefits with little substantive basis, I'd be shot.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 11/11/14

PART B2 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Keith Wooding

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055 to
M065

Policy Ref

CS1, to CSS,
SUE

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| c) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. The policies outlined in CS1 to 5 and relevant SUE documents are out of step with Public opinion.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP (updated October 2014) the Secretary of State for Communities, which states "Planners must protect our Green Belt" and "This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development". See link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. It is clear that no exceptional circumstances exist in Whiston.

The North West does not have the Housing shortage that London and the South east has, and as such removal of Greenbelt should not be considered in this case.

This objection to the release of green belt has also been raised as Knowsley council have not proven that all practical alternatives & Brown Field sites have been explored, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley plan fails to give high enough priority and consideration to the empty housing stock within the borough. Knowsley have a very poor record of bringing empty and derelict housing back into use. No reference can be found to any consultation with local housing trusts. Knowsley have not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. Duty to Co-Operate.

Green Belt is also supposed to stop urban sprawl, Knowsley already touches Liverpool at Huyton and the proposals at South Whiston will bring urbanisation up to the boundary with St Helens. Likewise the proposal at Cronton will bring Knowsley closer to Halton. This is NOT consistent with National Policy.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

c) No, I do not want to participate at any further public hearing

d) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

PART B3 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
e) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

In relation to KGBS14 South of Whiston. This policy is contrary to Strategic Objective 8, CS5, CS8 & CS21. Either the principles set out in SO8 are adhered to, or the land is used for development.

As stated in CS5 and CS8, it cannot meet both opposing policies. In fact C21 8.21-8.26 reduce to the point of being ineffective the relevance of CS3 and the requirement to release Green Belt land for development at all.

Given that there are prime areas of land around Prescot & Huyton that previously have been earmarked for housing yet lie undeveloped for a number of years indicates that Knowsley model for predicting the number of houses that will need to be built and the land required is flawed.

If the model was correct those areas would have been redeveloped. This proves that there is no justification to release Green Belt land except for Knowsley council financial benefit.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or **seeking a change** to one of the modifications to the Core Strategy **and there is a further public hearing** as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- e) No, I do not want to participate at any further public hearing
- f) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

PART B 4– YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
g) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to the area south of M62. The proposed September modifications took the emphasis off investment in existing locations and placed it firmly on the 'new'. This indicates that Knowsley have little or no appetite to fill the empty space in Huyton Business park and empty units on nearby Fallows Way.

A ten minute drive round Huyton Business Park will show how much unused land or empty unit/buildings are available. The occupancy level is one area where there are inaccuracies in the supporting documentation.

The area south of M62 doesn't need more employment locations, it just needs the existing areas to realise their full potential. Proper effective management would achieve this whilst allowing other Core Objectives to be met.

Clearly the site has potential, as recently a developer acquired a large site for redevelopment.

For Fallows way, it is believed that two of the three units are un occupied at present. If the remaining occupant could be encouraged to relocate to Huyton Business Park, the whole of Fallows Way could be given over to housing. Reducing further the need to use Green Belt land. This would have the added benefit of reducing the number of large lorries that use Windy Harbour Road daily and hence congestion.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11 / 11 / 14

PART B5 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With regard to KGBS14 South Whiston, there is very little mention of provision for new local centre, expansion or regeneration of existing local shops

As for 6.45, the policy is flawed and mostly irrelevant. This highlights lack of understanding of local issues. In turn this suggests that Knowsley have taken a 'one-solution-fits-all' approach. This element of the core strategy cannot be met.

Little mention is made of requirement for additional facilities such as health care or clinic, GP surgeries and dentist. Nursery and school requirements are also not described.

No reference was found to alternative policy documents that would detail these requirements, which suggests that no additional pre-school or school facilities are planned to meet huge increase in demand for services from such a large housing development. Similarly no additional health care provision. A number of strategic objectives will not be met

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- i) No, I do not want to participate at any further public hearing
- j) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

12/11/14

PART B6 – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| k) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| l) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

With reference to KGBS14 South Whiston area.

Improvements to existing rail network, enhancements to stations.
As a regular train user from Whiston Station, Network Rail have been observed undertaking a passenger survey. This is with a view to CLOSE Whiston station. How does that help meet the transport policy? Clauses 1a, 1c, 2b, 3b, 3e

Also, and contrary to supporting documents, bus routes and times have been revised to the effect of after evening rush hour a minimal number buses are running. This will prevent a number of clauses from being met.

This removes choice, a key policy objective.

In reality this will manifest itself as people making greater use of personal car or cars. This will further bring the transport policy into disarray and have a negative impact on other perceived benefits & strategic policies

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

11/11/14

37 SUSTAINABILITY APPRAISAL

Representations Relating to Local Plan Core Strategy Sustainability Appraisal

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
SUSTAINABILITY APPRAISAL 001	1	256	Gillian Pinder, Rainhill Parish Council
SUSTAINABILITY APPRAISAL 002	1	279	Irene Davis (3)
SUSTAINABILITY APPRAISAL 003	1	292	James O'Rourke
SUSTAINABILITY APPRAISAL 004	1	299	Janet Rourke
SUSTAINABILITY APPRAISAL 005	2	311	Jen Kokosalakis (1)
		311	Jen Kokosalakis (2)
SUSTAINABILITY APPRAISAL 006	2	330	John Sills (1) Petition (45)
		330	John Sills (2)
SUSTAINABILITY APPRAISAL 007	1	341	Julie Anne Parker (1)
SUSTAINABILITY APPRAISAL 008	1	341	Julie Anne Parker (2)
SUSTAINABILITY APPRAISAL 009	1	344	K Brown (2) Petition (47)
SUSTAINABILITY APPRAISAL 010	4	364	Kirsty Meredith
		444	Nicola Meredith
		468	Paula Meredith
		94	T W Bretherton
SUSTAINABILITY APPRAISAL 011	1	386	M E Wortley
SUSTAINABILITY APPRAISAL 012	1	412	Martin Parker (1)
SUSTAINABILITY APPRAISAL 013	1	412	Martin Parker (2)
SUSTAINABILITY APPRAISAL 014	1	412	Martin Parker (3)
SUSTAINABILITY APPRAISAL 015	1	422	Michael Humphreys
SUSTAINABILITY APPRAISAL 016	1	443	Nicola Hitchen
SUSTAINABILITY APPRAISAL 017	1	454	Patricia McDonald-Homes (4)
SUSTAINABILITY APPRAISAL 018	1	454	Patricia McDonald-Homes (5)
SUSTAINABILITY APPRAISAL 019	2	96	Ray Davis (1)
		96	Ray Davis (4)

SUSTAINABILITY APPRAISAL 020	1	542	Suzanne Lewis
SUSTAINABILITY APPRAISAL 021	1	551	Tina Cinnamond
SUSTAINABILITY APPRAISAL 022	1	550	Tina Cinnamond, Friends of Halsnead Allotments
Total	28		



Clerk to the Council:
Gillian Pinder

Website: 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]
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
- 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	Mrs Irene Davls MRS IRENE DAVLS	
Job Title (if appropriate)		
Organisation (if appropriate)	Whiston Green Belt action Group	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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.

Please see attached sheets in support of my view that the plan is not sound due to conflicts and is not legal because it doesn't take into account latest Government advice. It is also using out of date information; population projections from the ONS and an out of date Transport assessment

SEE COMMENTS IN RED.

Continue on a separate sheet if necessary...

If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

It is also using out of date information; population projections from the ONS and an out of date Transport assessment. The council should carry out a new Transport assessment and a new Population projection. Also, protect green belt and use Brown field sites which would supply enough housing by their own admissions.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

25/10/14

KNOWSLEY LOCAL PLAN: CORE STRATEGY

Submission and Objections regarding proposed modifications

P R Davis
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

Implications for South Whiston and Prescot Town Centre – Please see my comments highlighted

3.20 The appraisal concluded that the Spatial Strategy for Knowsley is likely to have a largely positive impact on the sustainability objectives. In Particular, it is envisaged that the Development Principles (CS2) are likely to have a major positive impact in the long-term on the objectives relating to health; mitigating climate change; and reducing the need to travel. It was concluded that the policies for Housing Supply (CS3), the Economy and Employment (CS4) and Town Centres and Retail (CS6) would have a positive impact on a range of objectives, particularly those that relate to social and economic issues and the appraisal also predicted that the policy for Green Infrastructure (CS8) would have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; adapting to climate change; and green infrastructure.

I would question how removing green belt can have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; and adapting to climate change.

3.21 The appraisal of the Proposed Submission document did however consider that a number of the policies would have an uncertain or negative impact on some of the objectives. For instance, it concluded that a number of the policies, such as the Spatial Strategy (CS1) and Green Belt (CS5) could have an uncertain impact on a number of environmental objectives in the longer term due to the potential for it to result in the release of a number of sites in the Green Belt.

How can this statement hold true to statement at 3.20 one is negative and one positive?

3.23 Nevertheless, the appraisal of the Proposed Submission document acknowledged that as each of the policies would result in built development and would therefore lead to some carbon emissions associated with the construction and operation of this development, their impact on the objective relating to mitigating climate change is uncertain. It also considered that there is some uncertainty over the impact of the policy for Knowsley Industrial and Business Parks (CS11) on the objectives relating to air quality and need to travel, particularly as there is limited information available on the amount and nature of the new employment uses that would be delivered. In addition, due to

both policies resulting in the provision of B1 office development in an out of centre location, the impact of the policies for Knowsley Industrial and Business Parks (CS11) and South Prescott (CS13) on the objective relating to the vitality and viability of Knowsley's town centres was also deemed to be uncertain.

The actions contained within the Local plan are identified here as uncertain and would certainly fail in meeting our green credentials as the development of green belt out of centre would increase the carbon impact.

3.24 On the whole, the appraisal of the Proposed Submission document concluded that the Thematic Policies performed well in the SA process. In particular, the policies relating to housing and the accommodation needs of the community (CS 15 – CS18) were considered to all have a positive impact on the objectives relating to poverty and deprivation; health and the provision of good quality housing; the policies relating to Sustainable and Low Carbon development (CS22) and Renewable and Low Carbon Infrastructure (CS23) were considered to have a major positive impact on the objective relating to mitigating climate change; and the policy for Greenspaces and Trees (CS21) was considered to have a major positive impact on the objectives relating to landscapes; biodiversity; adapting to climate change; and green infrastructure.

How can this point be made as positive when the document already highlights the possibility of a negative impact on all of the CS range of reports?

Proposed Modifications to the Submission Local Plan

3.26 The initial Local Plan Examination hearing sessions took place in November 2013. Following these hearing sessions, the Inspector appointed to undertake the examination issued his interim findings in January 2014. In response to these findings, and also to reflect other required amendments, the Council proposed a number of modifications to the Plan. These modifications included a revised approach to the release of Sustainable Urban Extensions, a reduction in the employment land target for the plan period, a reduced target level of affordable housing provision on sites in the urban area and the prioritisation of different forms of developer contributions in instances where viability is insufficient to fund all the non-mandatory requirements set out in the Plan.

The reduced level of affordable housing can only be in the favour of developers, government guidelines call for a level of 25%. A reduced level of employment land means that the target of job creation must be flawed.

4.10 The scale of any impact on an objective has been predicted taking into account the size of the site and the quantum of development it is likely to accommodate. In relation to housing sites, where an approximate number of dwellings that could be accommodated on a site have not been provided by the promoter of the site, its yield has been estimated based on the standard multipliers used for assessing the capacity of sites within the Strategic Housing Land Availability Assessment

(SHLAA) and the Green Belt Study. For sites in excess of 2 hectares in site size, this assumed a 75% net developable area and a density of 30 dwellings per hectare¹³.

In the case of South Whiston, 75% of the proposed area of 110.3 hectares minus 27.6 = 82.70 hectares @ 30 dwelling per hectare is 2481 dwellings. The council have only declared 1503 dwellings. This calls all of the council's estimates of housing into question. The proposal to bring forward Green Belt release on such a scale will also produce many more houses than the SHLAA calls for. Also the government has in October 2014 told councils to use the NPPF to protect Green Belt.

“Councils must protect our precious green belt land”

From: [Department for Communities and Local Government](#), [Brandon Lewis MP](#) and [The Rt Hon Eric Pickles MP](#)

First published: 4 October 2014 # Last updated: 6 October 2014

Part of: [Improving the energy efficiency of buildings and using planning to protect the environment](#), [Climate change](#), [Environment](#) and [Planning and building](#)

SUE 2c – Sustainable Urban Extension: South of Whiston and Land South of M62

5.44 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the further modifications to the policy would remove the specific reference to housing in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require the development to provide a wider choice of housing in the area. Consequently, given the substantial capacity of the site, it is considered that the policy has the potential to have a positive impact on the objective of providing good quality housing and this impact would become increasingly significant as the development is built out. The policy also promotes a significant amount of employment development in this location and, due to the scale of development that would be delivered, could also encourage further investment in the area, generate employment and training opportunities in the construction sector and help sustain existing local facilities. As such, the policy could also have a major positive impact on the objectives that relate to business growth and productivity; and reducing unemployment; and some positive effect on the objectives concerned with poverty and deprivation; and education and skills.

Any employment gains in the building industry are short term and will have little impact on local unemployment. With the reduction in affordable housing previously mentioned (3.26) how can the massive scale of over 2400 houses have a beneficial effect, without considerable investment in infrastructure. There are only two local primary schools, I question if they would have the capacity to cope with this massive

development. Already in (3.21 & 3.22) the question of environmental and green space negative impacts have been mentioned, a development on this scale would surely cause a negative impact on all those areas mentioned.

5.45 The policy would also result in residential development being directed to a location that is within reasonably close proximity of established employment areas and a number of local facilities, including primary schools, a GP and health centre and a local shopping centre on Greenes Road. It also requires new development in this location to contribute towards public transport provision and improve links to Whiston railway station. As such, the policy could have a positive impact on the objectives that relate to improving access to services and amenities; and the use of more sustainable transport modes.

Local transport in Whiston is very poor and anyone who is not a car owner and lives on Windy Arbor Road, has already seen a reduction in buses available since de-regulation. To suggest building a large number of houses will increase local transport is naïve in the least and downright misleading. The development by Halton in Cronton has not seen a vast increase in bus traffic and hardly a bus is available late at night. The local shopping centre mentioned is log jammed at busy times with cars and deliveries by Artics to Tesco and the odd truck using Whiston as a short cut from Tarbock island. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.46 Given the scale of development promoted, the policy has the potential to generate a significant amount of additional expenditure which could support nearby local centres. As such, the policy has the potential to have a positive impact on the objective that relates to the vitality and viability of town and local centres. In addition, a key element of the proposals for the site is the creation of a country park with associated footpaths, cycleways and bridleways, and the policy also requires development in this location to encourage walking and cycling and provide public open space. As such, it is considered that the policy could support participation in sport and recreation and could therefore have a positive impact on the objective that relates to health.

Why it is necessary for so much land to be considered for removal from the Green Belt, to the south of the M62. Only about a third of this is reported to be for development. It has been said that the rest will form a Country Park, on the Old Cronton Colliery site. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.47 The policy would however have the potential to have a negative impact on a number of objectives. In particular, it directs development to a greenfield site that contains large areas of Grade 2 Best and Most Versatile agricultural land. As such, the policy would have a major negative impact on the objective that relates to protecting land and soil. Directing development to this location would also have a negative impact on the objective that relates to protecting landscape character;

and could have a negative impact on the objective that relates to biodiversity by resulting in the loss of priority habitat and/or by placing pressure on nearby Local Wildlife Sites. Nevertheless, there is only a low level of certainty about the impact of the policy on this objective.

There is a clear admission here of the negative impact of taking this area out of Green Belt. With the increase in Global commodity prices locally produced food is more important. The need to remove Grade 2 Best and Most Versatile agricultural land from the Green Belt is not proven and 5.47 highlights the negative impact of this policy.

5.48 The policy will result in development taking place in a location that is within reasonably close proximity to local facilities and would also require the development to contribute towards public transport, walking and cycling. However, the construction and operation of this development would inevitably result in carbon emissions and would inevitably generate a significant number of vehicular trips and associated emissions. Consequently, the policy has the potential to have some negative impact on the objectives that relate to mitigating climate change; and protecting air quality.

There is a clear admission within (5.48) that the development proposed is identified as having a negative effect on carbon emissions and would certainly fail in meeting our green responsibilities. The mention of a significant number of vehicular trips bears out our belief that there would be a serious impact on traffic congestion within Whiston.

5.49 The policy would also have an uncertain impact on some of the sustainability objectives. Specifically, the policy would result in development being directed to a location that is in close proximity to a number of heritage assets. Nevertheless, due to the scale of the site, there may be scope to incorporate an adequate buffer around these assets to protect their setting. In addition, the policy requires development in this location to comply with Policy SUE 2 which, amongst other things, requires new development to protect and enhance historic and architectural assets. As such, it is uncertain whether the policy would have a significant impact on the objective that relates to preserving and enhancing Knowsley's built heritage.

These comments can only reinforce the need for a structured approach to any release of Green Belt and more time should be spent understanding all the issues before we take a decision that cannot be revoked.

5.50 Although the policy directs development to a greenfield site which has the potential to function as part of the Borough's Green Infrastructure network, it also involves the creation of a country park and the requirement for development in this location to be subject to a master planning should ensure the appropriate retention and provision of objective that relates to providing and conserving green infrastructure is also considered to be uncertain. Areas of

Green Infrastructure. As such, the impact of the policy on the objective that relates to providing and conserving green infrastructure is also considered to be uncertain.

(5.50) Again mentions uncertainty in the council decisions and in my view at least suggests they don't know what will happen when developers have free reign to build on our Green Belt. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.51 Similarly, although the policy would result in development taking place in the vicinity of a number of water bodies, there is limited certainty over whether this would impact on the water quality of these waterbodies. Consequently, it is considered that the policy would also have an uncertain impact on the objective of protecting, improving and where necessary, restoring the quality of inland, and estuarine waters.

We have yet to see a definitive study of water quality after development, and we suggest the loss of some 110 hectares of open countryside will seriously impact local wildlife

KGBS 14 - South of Whiston

5.82 Policy SUE1 identifies South of Whiston as a SUE primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development including the Local Wildlife Site but excluding Public Open Space. This option would not introduce any phasing restrictions but would include a policy requirement for ancillary facilities (e.g. Retail and Public Open Space). The second option considered was to allocate the site for housing development with site-specific allocations for retail and Public Open Space provision but no phasing restrictions. The third option was to allocate the entire site for housing development with no phasing restrictions.

We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision.

5.83 The appraisal concluded that each of these would have a similar impact on a number of the sustainability objectives. In particular, given the substantial capacity of the site, it concluded that each option could have a major positive impact on the objective of providing good quality housing and that this impact would become increasingly significant as the development is built out. However, by introducing a potentially inflexible approach to the provision of open space and retail, the appraisal recognised that Options 2 could have an adverse impact on the deliverability of the site which reduces the level of certainty that the option would have a major positive impact on the objective. Due to the size of the area and the quantum of development it could accommodate, each of the options could also generate a number of employment and training opportunities in the construction sector and

could stimulate further investment in the area. As such, the appraisal noted that each of the options has the potential to have a positive impact on the objectives that relate to reducing deprivation; skills and training; business competitiveness; and unemployment.

Once again there is too much that is hopeful and of little certainty and i would re-iterate my previous comment. We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision. This decision is at odds with local Public opinion and also at odds with the localism bill.

5.84 The appraisal considered that each of the options would also result in development taking place in close proximity to a range of local facilities and amenities including primary schools, a GP and health centre and a local centre on Greene's Road and development in this location could make a contribution to the continued viability of these services and facilities. Options 1 and 2 would also support the provision of certain facilities/amenities within the site. As such, each of the options could have a positive impact on the objective that relates to access to services and amenities but there is a higher level of certainty that Options 1 and 2 would have a positive impact on this objective due to these options resulting in the provision of facilities on-site. Given the significant capacity of the site, each of the options also has the potential to have a positive impact on Knowsley's town centres and the local centre on Greene's Road by increasing levels of expenditure in these centres. As such, each option could have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town centres

The retail centres mentioned at Greenes Road is a small satellite and little could be done to expand it. Increasing the footfall would inevitably increase traffic in what is already a very congested area. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.85 The appraisal did however recognise that each of the options could impact upon the setting and significance of a number of heritage assets and have a negative impact on the objective that relates to Knowsley's built heritage. These assets are however located towards the edges of what is a large site and there may be scope to incorporate an adequate buffer around these assets to protect their setting. Consequently, there is only a limited level of certainty that each option would have a negative impact on this objective. By resulting in the loss of a significant area of greenfield land and by potentially placing pressure on areas of ecological value, each option could also have a negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the

objective that relates to air quality. There is however a lower level of certainty that Options 1 and 2 would have a negative impact on this objective as both of these options would support the provision of some facilities on the site which could reduce the need to travel and associated vehicle emissions. Each option could also have a major negative impact on the objective of adapting to climate change; a negative impact on the objective of mitigating climate change; and an uncertain impact on the objective that relates to protecting water quality.

Once again the councils own comments highlight the negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the objective that relates to air quality, and also increase congestion.

5.86 Each option would result in the loss of a substantial area of greenspace, sections of which are used for informal recreation, and could therefore reduce opportunities for participation in informal sport and recreation and thereby have a negative impact on the objective that relates to health. Nevertheless, Options 1 and 2 would provide support for the retention/provision of areas public open space and could therefore have a positive impact on the objective. Conversely, Option 3 would not support the retention/provision of areas public open space and would therefore have a negative impact on the objective. Options 1 and 2 would also result in the provision of some facilities on the site which could help reduce the need to travel and have a positive impact on the objective that relates to reducing the need to travel and improving the use of more sustainable transport modes. By contrast, as Option 3 would not directly support the provision of on-site facilities, this option has the potential to have a negative impact on this objective.

Once again the councils own comments highlight the negative impact on outdoor activities and recreation for local people.

CS5 - Green Belt

5.133 The revised policy would have a largely similar impact on the sustainability objectives to the version of the policy included in the Core Strategy Submission document.

The use of Green Belt for building is overwhelmingly opposed by the majority of residents. The reason used by the council for use and early release of Green Belt does not meet the NPPF in regard of the 5 purposes of Green belt and Extraordinary needs do not exist, to remove Best and Most Versatile agricultural land. It is also at odds with latest government thinking. See 4.10

5.134 The policy would continue to protect the majority of Green Belt from inappropriate development but, as with the previous version of the policy, would support the identification of a series of sites for release from the Green Belt to ensure that there is sufficient housing and employment land to meet the needs of the Borough. However, the proposed modifications to the policy would mean that the release of these Sustainable Urban Extensions (SUEs) is no longer controlled by a phasing mechanism and the modifications would also result in these sites being allocated for development rather than just identified as broad locations. These modifications mean that the SUEs would now be more likely to come forward earlier in the plan period. As a result, many of the impacts that would have occurred in the longer term under the version of the policy included in the Core Strategy Submission document would now occur earlier in the plan period under the revised policy.

The rapid release of Green Belt land can only be to the benefit of developers and will put back development of brown field sites. The council admitted at the hearing that early release of Green Belt will result in the delay of development of brown fields, and this too is highlighted by latest government thinking, see 4.10. The proposal to release Green Belt early is a poor decision not made in the best interests of local people. We will quickly see what a poor decision it was.

5.135 By continuing to support the identification of SUEs and safeguarded land for housing and employment development the amended policy would continue to ensure that there is sufficient land to meet the Borough's development requirements. It is therefore envisaged that the revised policy would still have a positive effect on the objectives relating to poverty and deprivation; housing; the growth potential of business sectors; and maintaining high and stable levels of employment. However, as noted above, these impacts are now predicted to occur earlier in the plan period. In addition, by potentially resulting in the SUEs coming forward earlier in the plan period, the modifications to the policy could result in the SUEs competing with the Council's regeneration objectives for urban areas. As a result, the modifications to the policy reduce the level of certainty that it would have a positive impact on the objective that relates to poverty and deprivation.

The proposal to release Green Belt early will impact on the council stated regeneration objectives. Little in the way of long term employment will come from vast housing estates, only a greater demand on roads, schools, GP's and a lowering of air & water quality with an increase in noise pollution.

5.136 In addition, as the amended policy would result in some housing and employment development taking place in areas on a series of predominantly greenfield sites that are presently within the Green Belt, it could have a negative effect on the objective relating to land and soil and an uncertain effect on the objectives relating to landscape character and accessibility; and Green Infrastructure. Key mitigation measures to address some of these impacts will include ensuring new

development is built to an appropriate density, retaining areas of woodland, securing the provision of on-site open space, and securing appropriate landscaping to moderate the impact of proposals on the local landscape character.

I have already called into dispute the density quoted by the council as the proposal in South Whiston and the Council average density of 30 dwellings per hectare is significantly above the information they have given the public and what they have consulted on. Consultation is 1503 against 2481 according to calculation using average density(4.10). Latest planning applications are far in excess of what the public were told, Recently Knowsley gave outline planning permission for 207 dwellings at Bank Lane, Kirkby (even though the site is still in the Green Belt). This is a difference of 76 dwellings, and represents a 58% increase on the capacity that Knowsley Council said the site had.

5.137 As some of the SUEs are used for informal recreation and others contain sports pitches, it is considered that the revised policy could also still have a long term negative impact on health. The proximity of some of the locations to designated heritage assets and the presence of archaeological assets within some of locations mean that the revised policy would also still have an uncertain impact on the objective relating to built heritage in the longer term. It is also considered that the policy still has the potential to have a negative impact on the objective relating to biodiversity. Undertaking ecological surveys, excluding areas of priority habitat from the developable area and the provision of on-site habitats are all likely to be key mitigation measures. However, as noted above, these impacts are now predicted to occur earlier in the plan period.

Uncertain impact on archaeological assets within the area will be compromised. We have not seen Ecological research to discredit the assertion that removing this area from Green Belt will not have a catastrophic effect. The modifications will bring the ecological disaster forward, so that we may see them before our Grandchildren do.

5.138 The revised policy still would have the potential to result in more dispersed patterns of development. In addition, the construction and operation of the development that would be delivered on the SUEs would inevitably result in carbon dioxide emissions. Consequently, and notwithstanding the fact that the Knowsley Local Plan Transport Feasibility Assessment (2012) identified that some of these locations have good accessibility to bus routes, cycle routes and services and facilities, it is considered that the revised policy would still have an uncertain effect on the objectives relating to mitigating climate change; protecting air quality; and minimising the need to travel.

This point is broadly supporting our ascertainment as to the detrimental impact on traffic within the area. Local People contest the accuracy of the Knowsley Local Plan Transport Feasibility Assessment (2012) as our research carried out by local people show more than 400 vehicles per 30 minute session at peak times and if deliveries took place to Tesco with Artic then the whole area became log jammed. Only one bus per

hour was spotted until 7pm when the service stopped. We would assert that the transport assessment is out of date and not relevant to the increase in traffic we have seen and would call for another assessment to be carried out.

CS14: Principal Regeneration Area – Prescott Town Centre

5.156 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process. The revised policy would still direct investment to Prescott town centre and would seek to intensify its retail function, encourage a wider mix of uses and create a distinctive identity and a complimentary evening economy. As such, the revised policy would still have the potential to have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town and local centres. The amended policy wording does however remove some of the restrictions placed on retail development in Cables Retail Park. In particular, it is no longer specified that retail development within Cables Retail Park should provide for convenience or bulky goods retailing and should maintain the current retail floorspace capacity of the Retail Park. These amendments could increase the scope for further investment in the Retail Park and result in a consequential reduction in investment in Prescott town centre, particularly as the Knowsley Local Plan Economic Viability Assessment (2012) indicates that comparison retail in Prescott town centre is generally unviable in current market conditions. This reduces the level of certainty that the revised policy would have a positive effect on the objective.

Prescot town centre is run down and irrelevant in retail terms, even the council have had to move offices to an ex pub at vast expense, just to fill another empty building. When the council allowed Tesco to build a massive supermarket at Cables Retails park it as good as sounded the death knell of Prescott town centre. (5.156) Broadly agrees with our assessment.

5.157 By reducing the level of certainty that the policy would support investment in Prescott town centre, these proposed amendments mean that there is also a lower level of certainty that the revised policy would have a major positive impact on the objective that relates to protecting and enhancing Knowsley's built heritage.

Not proved

5.159 There are no anticipated negative effects on the sustainability objectives. The proposed modifications would not however prevent the policy from having an uncertain impact on the objective relating to mitigating climate change

Not proved. Agrees with earlier points that state the policy with have a detrimental effect on climate change.

5.177 The revised policy also still encourages the re-use of vacant and underused historic assets and states that favourable consideration will be given to schemes that enhance the importance of the asset for the economy. The policy could thereby result in the creation of premises for new businesses. In addition, protecting and enhancing buildings and features of historic interest should help create more attractive places to invest in and could lead to enhancements to Prescot town centre. Consequently, the amended policy would also continue to have the potential to have a positive effect on the objectives relating to poverty and deprivation; increasing the number of new businesses; enhancing the vitality and viability of town and local centres; and maintaining high and stable levels of employment and reducing long-term unemployment.

Developers will not consider run down existing areas, whilst vast areas of Green Belt are available, which are considerably easier to develop.

CS21: Green spaces and Trees

5.179 The proposed modifications to the policy would have some impact on the performance of the policy against a number of sustainability objectives. In particular, although the revised policy still seeks to resist new development which would result in the loss of greenspace and would provide support for the provision of new areas of greenspace, the modifications to the policy mean that it would now encourage the retention of existing trees and woodlands and the appropriate planting of new trees rather than require this. This amendment to the policy wording is considered to reduce the level of certainty that existing trees would be retained and new planting secured. Consequently, whilst it is considered that other aspects of the policy would ensure that it continues to have a major positive impact on the objectives that relate to landscape character and green infrastructure; and a positive impact on the objectives that are concerned with adapting to climate change; mitigating climate change; water quality; and air quality; it is considered that this modification results in only moderate certainty that the policy would have a positive effect on these objectives.

Once Knowlsey has shown itself to be open to removing Green Belt from protection, future planning applications will use this behaviour to push for more releases. This is a slippery slope that Knowlsey council have embarked on which will create a borough which only has an ex tip and non-public green space.

5.181 The revised policy would still seek to resist the loss of greenspace and would provide support for the improvement of existing public open spaces and encourage the provision of new greenspaces. It could therefore help provide opportunities for participation in sport and recreation which would have a positive effect on the objectives relating to health; and poverty and social deprivation. It is however recognised that the provision of opportunities for sport and recreation does not necessarily guarantee engagement in these activities and, as a result,

there is only a low level of certainty about the effect on these objectives.

I would welcome the opportunity to see where Knowsley believe they can get new green spaces from? Also the council have overstated the positive impact on health, poverty and social deprivation that a vast estate of houses can have. It is more likely that this influx of residents could also increase anti-social behaviour.

CS22: Sustainable and Low Carbon Development

5.183 It is envisaged that the proposed modifications to the policy for Sustainable and Low Carbon Development would have a number of impacts on its performance in the sustainability appraisal process. The amended policy still requires development to incorporate a range of measures which would improve its sustainability. Nevertheless, the removal of the requirement for new development to achieve particular Code for Sustainable Homes/BREEAM standards and the removal of the requirement for development to incorporate decentralised and low carbon energy, means that there is a lower level of certainty that the policy would have a major positive effect on the objective that relates to mitigating climate change. Similarly, by not requiring new development to achieve particular Code for Sustainable Homes/BREEAM standards it is considered that the policy is less likely to result in new developments which incorporate water conservation measures or make use of recycled materials. As such, the proposed modifications mean that there is a lower level of certainty that the policy would have a positive impact on the objectives that relate to minimising the production of waste and increasing recycling rates; and ensuring the prudent use of water and mineral resources.

To remove the need for developers to meet Code for Sustainable Homes/BREEAM standards is another nail in the coffin of our councils green credentials. It is a bizarre decision at the start of the 21st century, particularly as we all face the prospect of climate change. The demand on energy, water and other resources is likely to be much higher.

5.184 In addition, the removal of the requirement to achieve certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.

Once again this point is totally at odds with other statements and shows that there would be a negative effect on the objectives that relates to poverty and deprivation; and health.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form



Knowsley Council

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- > By email: LocalPlan@knowsley.gov.uk
- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	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.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The development of Green Belt in Whiston will have a negative effect on the aim to mitigate climate change. The Sustainable and Low Carbon Development (S.183 S032-CS22) removal of the developers need to meet sustainable homes/ BREEAM standards will increase energy ~~usage~~. The increased traffic in the area will increase carbon emissions and have a detrimental effect on air quality. The Industrial Estate mentioned on Windy Arter Road has little effect on employment as the few factories that are occupied, have no need for more workers. There is also an acceptance that this development will not be suitable for energy generated by renewable sources. In addition, the removal of the requirement to achieve a certain Code for Sustainable Homes standards mean ~~that~~ there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health. "The need to build more sustainable housing with a limited supply of land means that innovation is necessary but working towards sustainable communities relies on more than the achievement of zero carbon housing; its success will also be determined by the selection of appropriate locations for development", Neil Williamson FCI, 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

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

01/11/14.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

Knowsley Council

CHIEF EXECU
12 NOV 2014
REC

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- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS.	
Name	JANET 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.*

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

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)

a) Legally Compliant? (see guidance note 2.2)

Yes

No

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Councils philosophy about new housing contributing to economic development and population retention is fundamentally flawed. See first paragraph in Document KQBS 14, SA Objective ECI (above) outlining 'None of the options for Land to the South of Whiston include an employment element'

May encourage further investment in the area sustaining local employment and also potentially bringing new jobs into the area is not a 'sound' reason for economic development, competitiveness and productivity of business as stated Document KQBS 14 SA Objective ECI.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Carry out an up to date housing requirement survey taking into account the latest figures from the office of National Statistics.
Carry out a relevant Traffic Management survey taking into account the existing roads at peak times and the additional roads placed upon the area with an influx of at least 2200 vehicles.
Insist that empty properties and brown field sites are developed before considering GREEN BELT release.
Put back any Green Belt release until end of plan period and even then consider all other areas, green belt release should be the last resort, not the first action. Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

1st Nov. 2014

To Local Plan Team
Knowsley MBC
1st Floor Annexe
Municipal Buildings
Archway Road
Liverpool
L36 9YU

CHIEF EXECUTIVE
14 NOV 2011
RECEIVED

From: [REDACTED]
Sent: 14 November 2014 00:42
To: Knowsley Local Plan
Cc: [REDACTED]
Subject: Knowsley Local Plan:Core Strategy Proposed Modifications - ConsultationRepresentations form
Attachments: JenK13112014CSModsResponseFormGuidance2.docx; MBKLocalPlan.doc; To Local Plan Team.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Local Plan Team

I attach my completed form and referred submission of John Sills who has authorised me to inform you I wish to sign his form as attached , being a copy of his already submitted submission.
Trust this is all useful

Jen Kokosalakis

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Ms	
Name	Jennifer	
Job Title (if appropriate)	Kokosalakis	
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Preferred Method of Contact	[REDACTED]	

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jennifer Kokosalakis

1. To which proposed modification to the Core Strategy does this representation relate?

Modification
Ref

M078, M168 & M272

Policy Ref

CS5, SUE1, SUE2

Map extract 5 Land bounded
by A58 Prescott

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-----------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> NO |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> NO |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

3. I consider this is **NOT LEGALLY COMPLIANT** because there has not been sufficient consultation. I only know of one, Dr John Sills,* who had heard of the proposals. I have not until this Wednesday, been aware, or notified of any council consultation on this matter, The Knowsley Park Lane lamp post notice and letter which he received, never appeared in Park Road, even though this proposal is in my vicinity. I am shocked KMBC's good record of consultation has not applied to this action.

I consider this change from Green Belt to Sustainable Urban Extension (for residential use) **IS NOT SOUND**, being inappropriate for the western corner because due to the brook bridge it's perimeter consists of very much higher road levels and probably is the reason there is just one farm bungalow right in the centre of it, because other parts of the site would be oppressively low, lacking light and views, so I recommend the farm and its field be changed back to Green Belt. Green belt land should only be planned for development, if all full potential of brownfield sites has been allocated, of which there are many.

Visually and historically Prescott Town crowns the height of the sandstone ridge dramatically. The existing Green Belt wedge at the base (the Whitaker triangle /this proposed modification site) is significant in leading the view up to this pinnacle. Infill this with housing of any scale and the long established vista - visible from great distances - will be lost.

As with a number of these Core Strategy proposed modifications, this part of the defined site is traversed by a stream, (Prescot Brook), which by its presence, it is the lowest point in the surrounding topography and dwarfed by the A57 and wall above, which as well as this can be an unpleasant factor regarding light and outlook, as indicated by the farm bungalow being right in the middle. This has no other housing, for obvious historic reasons - to be safe from potential flooding - which if housing is built here with increased hard surfaces of houses, roads, parking and hard landscaping and increasing danger from climate change, would intensify flash flood danger. Even if culverting is employed across the whole site, there could still be a danger in future of backing up. If the housing is kept clear of the lowest flood endangered land, this would reduce the numbers of housing and maybe become non cost-effective.

But I agree with the modification to change the northern section from Green Belt to Urban Greenspace and educational land as long as this does not mean high rise school buildings overshadowing the adjacent housing.

* whose submission I have now had sight of and wish to add my name to his list of **objectors regarding the whole of his submission.**

you are objecting to the modification please set out how you consider it should be changed

to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

4. **To make this LEGALLY COMPLIANT** this modification to Sustainable Urban Extension (for residential use) should be subject to consultation with all residents of Prescott, the Historic Soc. and THI and potential developers should be consulted re the risk of flooding.

To make this modification to Sustainable Urban Extension (for residential use), **SOUND** it should be changed back to Green Belt or to Urban Greenspace.

Even if culverting is employed across the whole site, there could still be a danger in future of backing up.

If the housing is kept clear of the lowest flood endangered land, this would reduce the numbers of housing and maybe become non cost-effective.

I agree with the modification to change the northern section from Green Belt to Urban Greenspace and educational land as long as this does not mean high rise school buildings overshadowing the adjacent housing.

PART B – YOUR REPRESENTATIONS

(This is a DUPLICATE of Part B as my comments relate to MORE than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
a) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input type="checkbox" value="NO"/>
b) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input type="checkbox" value="NO"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

MAP EXTRACT 6 CARR LANE PRESCOT

I consider this is **NOT LEGALLY COMPLIANT** because there has not been sufficient consultation. I only know of one, Dr John Sills, who had heard of the proposals. I have not until this Wednesday, been aware, or notified of any council consultation on this matter, The Knowsley Park Lane lamp post notice and letter which he received, never appeared in Park Road, even though this proposal is in my vicinity. I am shocked KMBC's good record of consultation has not applied to this action.

Not sound

As with a number of these Core Strategy proposed modifications – this site is traversed by stream and possibly farm ditches. Also by definition of the existence of the stream, it is the lowest point in the surrounding topography, which as well as this can be an unpleasant factor regarding light and outlook, these areas have no housing in the vicinity, for obvious historic reasons - to be safe from potential flooding - which if housing is built here with increased hard surfaces of houses, roads, parking and hard landscaping and increasing danger from climate change, would intensify flash flood danger.

Even if culverting is employed across the site, there could still be a danger in future of backing up.

If the housing is kept clear of the lowest flood endangered land, this would reduce the numbers of housing and maybe become non cost-effective.

Also Green belt land should only be planned for development, if all full potential of brownfield sites has been allocated, of which there are many.

The site is adjacent to South Prescott Planning Action Area and it would seem premature to consider housing here, until it is known what proposed activities are planned adjacent.

* whose submission I have now had sight of and wish to add my name to his list of **objectors regarding the whole of his submission.**

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

4. To make this legally compliant this modification should be subject to consultation with all residents within walking distance of the playing fields etc.. and potential developers should be consulted re the risk of flooding. To make his Strategy sound it should be changed back to Green belt or to Urban Greenspace, or a decision delayed to combine it with the strategy for South Prescott Action Area

PART B – YOUR REPRESENTATIONS

(This is a **SECOND** duplicate of Part B as my comments relate to 3 modifications)

Name and/or Organisation

Jennifer Kokosalakis

1. To which proposed modification to the Core Strategy does this representation relate?

Modification
Ref

M078, M168 & M272

Policy Ref

CS5, SUE1, SUE2a

Map extract **3 Knowsley
Lane, Huyton**

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox" value="NO"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox" value="NO"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I consider this is **NOT LEGALLY COMPLIANT** because there has not been sufficient consultation. I only know of one, Dr John Sills*, who had heard of the proposals. I have not until this Wednesday, been aware, or notified of any council consultation on this matter, The Knowsley Park Lane lamp post notice and letter which he received, never appeared in Park Road, even though this proposal is in my vicinity. I am shocked KMBC's good record of consultation has not applied to this action.

Not sound to change designation from Green Belt to for mixed employment and residential use. I notice, as many areas of these proposed modifications, this area has been the location of playing fields and is partly wooded, which should be kept as such green spaces particularly since the council is aware that a high proportion of its population inhabit flats or terraced houses with little garden space, have low car ownership, are multiply deprived, have high average levels of bad & very bad and health and there is the obesity factor – all of which freely accessible local playing fields could be so beneficial and it is not just to replace these with yet more housing and any industry would be disadvantage financially by flooding. As with a number of these Core Strategy proposed modifications, the defined site is traversed by stream and probably farm ditches. Also by definition of the existence of the stream, it is the lowest point in the surrounding topography, which as well as this can be an unpleasant factor regarding light and outlook, this has no other housing, for obvious historic reasons - to be safe from potential flooding - which if housing is built here with increased hard surfaces of houses, roads, parking and hard landscaping and increasing danger from climate change, would intensify flash flood danger. Even if culverting is employed across the whole site, there could still be a danger in future of backing up. If the new development is kept clear of the lowest flood endangered land, this would reduce the numbers of housing and maybe become non cost-effective.

* whose submission I have now had sight of and wish to add my name to his list of **objectors regarding the whole of his submission.**

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

4. To make this **legally compliant** this modification should be subject to consultation with all residents within walking distance of the playing fields etc.. and potential developers should be warned re the risk of flooding.

To make this strategy **SOUND** it should be changed back to Green Belt

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing


b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.



Signature

Date 13/11/14

I wish to emphasize that having heard from John Sills who had already submitted objections with supporting signatures, he has allowed me to peruse his submission and for me to state that I support his statements and wish my name/signature to be added to it retrospectively, so I here attach it to follow my own additional submission above. And place my signature here  again to confirm this.

Dr J.A.Sills

Local Plan Team,
Knowsley Council,
1st Floor Annexe,
Municipal Buildings,
Archway Road, Huyton, L36 9YU.

9.11.2014

Dear Sirs,

Re KNOWSLEY LOCAL PLAN-PUBLIC CONSULTATION.
LAND BOUNDED BY A58. (Whitaker's triangle),
together with similar proposals
for KNOWSLEY LANE and CARR LANE.

1. The Council have not publicised this matter as widely as in my view they should. Consultation (1.36 & 1.37 : CS09c: p8-9) is claimed to have been wide ranging and innovative. The first indication in my area was a notice placed on a lamp post, followed by a letter through the post. Given that this is a matter that affects the whole town surely the Council should have made every household aware of this very important matter. It seems to be the case that the owner of Dye House in the southwest corner of the A58 land/Whitaker's Triangle was not informed about the proposals to remove the land from the GREEN BELT. It is a further reflection of the lack of publicity that when I went, as advised, to the PRESCOT ONE STOP SHOP to view the documents, none of the staff on the desk appeared to know anything about this PLAN and they had to phone round before discovering that the documents were to be found in a plastic basket. I did not see any publicity about the PLAN in the ONE STOP SHOP. For such an important public consultation it seems as if the Council have done the minimum required. Furthermore in the letter there is reference to a PUBLIC CONSULTATION with an examination in public in November 2013 and July 2014. I have no recollection of being informed of such an EXAMINATION IN PUBLIC, and given the importance of such an examination on the GREEN BELT. had I been informed I would have made representations to the Council and the INSPECTOR. *Hence the LOCAL PLAN is unsound on the basis of the failure of the Council to carry out adequate consultation with the wider public. In particular the policies outlined Doc CS08c M049-65 Policy Ref CS1-CS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: p51: M168 (Doc CS08c: P51) new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC. The Council should therefore consider re-convening the public consultation process to take note of the views of local residents relating to the GREEN BELT proposals.*

2. It will be on record that this land was incorporated into the GREEN BELT in the early 1980's, following attempts to build office blocks on the land by SEARIDGE PROPERTIES. Councillor the late JIM LLOYD, the then Leader of the Council, was instrumental in the land being incorporated into the GREEN

BELT. Among the grounds for this decision, which will be available in the Planning Department was that the land would serve to provide a buffer between PRESCOT and the conurbations on the other side of the M57. This land is thus part of the M57 GREEN BELT CORRIDOR, designated as a STRATEGIC GREEN LINK. It is also noted that NATIONAL POLICY requires that GREEN BELT BOUNDARIES once set should be permanent. It is also the case that the land on KNOWSLEY LANE and CARR LANE also form part of this corridor. The land on KNOWSLEY LANE is the first patch of green land after 8 miles. This land greets travellers up PRESCOT ROAD from LIVERPOOL, when they go round the roundabout. Then on the second roundabout they are separated from the conurbation of PRESCOT by the A58/WHITAKER'S TRIANGLE site on the other side of the PRESCOT bypass.

3. Surely before any land in KNOWSLEY BOROUGH is taken out of the GREEN BELT all available BROWN FIELD SITES should be used up, rather than taking the soft option, which developers seek, of releasing GREEN BELT LAND, which once lost can never be regained. There have been 7 houses up for sale in KNOWSLEY PARK LANE over the past 2-3 years and only 3 have been sold; two recently, one has been taken off the market, two are still up for sale and one is currently being divided into two units. There are also a number of flats in ELM HOUSE up for sale. Thus there does not seem to be any great demand for housing in the local area of WHITAKER'S TRIANGLE. It is also a matter of record that recently there have been major housing developments in the local area: on the old Boys Grammar School site on St Helens Road, and on the old BICC site, where there has also been significant retail development. There are figures which suggest that there are significant numbers of unoccupied properties, (2020 properties figures for 2012, Knowsley Local Plan Monitoring Report: para 3.65 p32, and a potential for 5636 dwelling sites available) which together with a view that the housing targets are ambitious rather than realistic, would mean that the housing target of 8100 could almost, $(2020+5636=7656)$ be achieved without utilising the GREEN BELT. In addition in the SHLAA Report of 2012: para 8.3, p 30) there is reference to the Borough having 12.6 years of capacity rather than 15 years. It must be a possibility that as the 12.6 years approach the situation regarding available brownfield land may have changed. In this context relating to housing there is no reference to any consultation with any local housing trusts. The other concern relating to the release of land from the GREEN BELT is that development on these sites will be more attractive to developers, (not to mention the capital appreciation of the value of the land following change from GREEN BELT status), so there is thus a real risk that brown field sites will not be developed, and may remain as blighted sites in the Borough, as former GREEN BELT sites are developed preferentially. GREEN BELT land once released and developed is lost forever. Hence the GREEN BELT should be protected as recommended recently by the Secretary of State, ERIC PICKLES, whose views on the use of GREEN BELT land (15.1.10) include: "incursions into the GREEN BELT must only occur in exceptional circumstances and must be planned in a logical and strategic way". In Document

Hearing Statement 5A from October 2013 there is also reference in para 5.1 to “exceptional circumstances” relating to GREEN BELT and in 5.1.1 the policy is amended to “Inappropriate development will not be permitted in the GREEN BELT unless very special circumstances can be demonstrated, and the visual and recreational amenities of the GREEN BELT will be preserved”. The current proposals can surely not be regarded as being exceptional circumstances particularly in the context of the latest guidance.

4. The main planning objections relate to CORE STRATEGY: Doc CS08c M049-65 Policy Ref CS1-CS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: M161, **p47: M157** and **p51: M168 (Doc CS08c: P51)**, new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC: “To bring forward new site allocations and policy guidance which will address the shortfall identified in the 5 year deliverable land supply for housing and the urgent needs for specific employment uses identified in the Inspector's Interim Findings (January 2014) and further matters identified during the Examination in Public”.

5. It is noted (Doc CS09a p64) that the NATIONAL PLANNING FRAMEWORK, states the five purposes of including land in the GREEN BELT:

1. To check unrestricted sprawl of large built-up areas.
1. To prevent neighbouring towns from merging into one another.
2. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In the case of the land bordered by the A58 and indeed the land on Knowsley Lane, and Carr Lane, these three sites currently check unrestricted sprawl, prevent merging of neighbouring towns, assist in safeguarding the countryside from encroachment, and in the case of the A58 land help to preserve the setting and special character of PRESCOT. PRESCOT is described in 2.22 (CS09b: p18) as having an older historic core, and in 2.38 the town centre is described as an area of particular historic interest with origins dating back to medieval times and with strong connections with the 18th and 19th century clock and watch manufacturing industries. Prescott Town centre is one of the 15 Conservation Areas of the Borough (2.40), and abuts into the southwest corner of the A58 land/Whitaker's Triangle.

6. Policy CS5 (p52 of Doc CS209a) states that “inappropriate development will not be permitted in the GREEN BELT except in very special circumstances in which it has been demonstrated that the harm to the Green Belt would be outweighed by other considerations”. In all submissions in para 6A (Doc CS209a) there is no specific discussion of the merits of this change in relation to the A58 land/Whitaker's Triangle. It is possible that there is a COVENANT on the use of the land established by the LORD DERBY, when the land was

released for housing along Knowsley Park Lane, which should be clarified by the Council.

7. In 5.41A (CS09a: p54) it states that the Council wishes to allow further development within previously developed sites in the Green Belt provided the openness of the Green Belt is preserved.

8. In Policy CS8 (CS09a: para 1&2: p 69) there is reference, for example, to ensuring more attractive and cleaner neighbourhoods, sustaining and promoting biodiversity, preserving the character and function of historic environments and valued landscapes, to provide local opportunities for sport, mitigating the effects of climate change and flood risk, mitigating air, water and noise pollution to protect and enhance strategically important areas of green space, promote effective movement of wildlife through a network of green strategic links. In para 4e (p70) there is reference to the M57 Green Belt corridor as a strategically green link. Developing on the GREEN BELT will counter to these aims.

9. In chapter 6 the only reference to the A58 land/Whitaker's Triangle is in para 6.45 (p95) where there is reference to "Land to the North West of Prescot for housing" and in chapter 6A the reference is to SUE 1 site e. There is a generic reference to the site in 6A 11 and whereas in SUE 2: 3(p105g) there is reference to supplementary planning documents for sites a-c, there is no specific reference to e. However in para 6A: 19, there is reference to the lack of necessity for supplementary planning, with a comment that Planning Applications would need to demonstrate a comprehensive approach to delivery of development within the site and to the provision of any necessary infrastructure or developer contributions. There is thus nowhere in this document any discussion about the particular merits or otherwise of including the A58 land/Whitaker's Triangle in SUE 1e and taking it out of the GREEN BELT, and in particular there is no discussion about the northern 10 acres currently used as school playing fields during the week and at weekend as pitches for local youth football teams. In this day and age, with the problems of weight in children, and indeed adults, there would seem to be no cogent reason to remove this part of the A58 land/Whitaker's Triangle from the GREEN BELT.

10. More discussion on this issue is however to be found in the Document SD32b "proposed Modifications Sustainable Appraisal Appendices". Incidentally this is a problem with attempting to comment on the Local Plan; there are so many documents that it is difficult to peruse them all, sift out the important paragraphs and collate a response. In this document in KGBS8, (pp198-202) there is reference to 3 options, for the A58/Whitakers site: 1) with housing density of 25dph, 2) allocation of the whole site and 3) housing with 30dph. The preferred options seem to be 1 or 3 as these two would keep the playing fields, whose benefits seem to be acknowledged. The benefits from removing the site from the GREEN BELT include a positive impact on reducing deprivation by stimulating investment and creating jobs in the construction sector (S1). This might be offset

by losses from reduction of current commercial activity on the site at the Nursery. Each of the options would however result in housing being built on a predominately greenfield site and unless appropriate mitigation measures were implemented could also lead to loss of priority habitat and mature trees which contribute to the character of the area. Each of the options has the potential to have a negative effect on the objectives that relate to the local character of the landscape and biodiversity particularly if they result in the loss of protected trees and areas of woodland and detrimental to the visual amenity. Hence if there is to be development on the site trees, habitat and environment should be protected. The site is seen as having good access and transport links, with easy access to local facilities within walking distance (S2). There are concerns over traffic (see para 21). In S6 there is discussion about the type of housing envisaged, and there seems to be an aim to have high quality housing together with option 2 (30dph) providing the better opportunity to include affordable housing. S8 deals with preserving, and enhancing Knowsley's rich diversity of cultural historical and archaeological buildings, areas, sites and features. The discussion focusses on the relationship with, and status of, the Conservation Area, the needs of this area and the view that each option could generate additional investment in the area and therefore help contribute to the conservation and enhancement of these historic assets. Of the options there was a view that option 3 would have less scope to adopt a sympathetic design and that this option 3 had the greater potential to have a negative impact on the setting of designated heritage assets. E1 comments on the protection, enhancement management of the local character while E2 comments on biodiversity and viability of protected and endangered species, habitats, biodiversity, and sites of geological importance. It was concluded that while the site is in a narrow gap between Huyton and Prescot, development in the location would not significantly affect reduce the gap. E3 acknowledges that there is a flooding risk, but in spite of lack of information about groundwater flooding, it is stated that *only isolated* locations within the area are likely to suffer groundwater flooding. Many of these issues are discussed in the following paragraphs.

11. Hence for such a strategic and important piece of land to be included in proposals relating to removal of land from the GREEN BELT, without any specific justification does not seem to indicate that any degree of consideration has been given to the merits of this proposed inclusion.

12. Knowsley Lane is another site: SUE 2a, where the green belt is threatened and where the comments in relation to SUE 1a are just as relevant.

13. In the case of the land bordered by the A58 land/Whitaker's Triangle and indeed the land on Knowsley Lane, and on Carr Lane, these are all in the M57 corridor and currently check unrestricted sprawl, prevent merging of neighbouring towns, assist in safeguarding the countryside from encroachment, and in the case of the A58 land help to preserve the setting and special character of Prescot. The town is described in 2.22 (CS09b: p18) as having an

older historic core, and in 2.38 the town centre is described as an area of particular historic interest with origins dating back to medieval times and strong connections with the 18th and 19th century clock and watch manufacturing industries. Prescott Town centre is one of the 15 Conservation Areas of the Borough (2.40), and abuts into the southwest corner of the A58 land/Whitaker's Triangle.

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18. Furthermore the COUNCIL should be aware of the new guidance to reinforce green belt protection (October 2014) updated by the DEPARTMENT FOR COMMUNITIES AND LOCAL GOVERNMENT to underline the NATIONAL PLANNING POLICY FRAMEWORK. According to the guidance when council is assessing the availability and suitability of land to meet its housing need during local plan preparations, it should take account of any constraints such as green belt which "indicate that development should be restricted and which may retrain the ability of an authority to meet its targets". According to the guidance unmet housing need, including for traveller sites, is unlikely to outweigh the harm to the green belt and other harm to constitute the "very special circumstances" justifying

inappropriate development on a site within the green belt. Mr ERIC PICKLES is quoted as stating: "This Government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or to see the vital green lungs around their towns and cities [used for] unnecessary development. Today's guidance will ensure councils can meet their housing needs by prioritising BROWNFIELD SITES, and fortify the GREEN BELT in their area". Planning Minister BRANDON LEWIS is quoted as stating that "We have put Local Plans at the heart of the reformed planning system so councils and LOCAL PEOPLE can now decide where development should and shouldn't go". Hence the COUNCIL should be heeding this latest GOVERNMENT GUIDANCE and taking note of what THE PEOPLE want in terms of GREEN BELT, ie that the GREEN BELT should not be sacrificed. Exceptional circumstances do not therefore exist to justify removing land from the GREEN BELT. It is also worthy of note that in a document from the LANDSCAPE INSTITUTION, entitled "PROFITABLE PLACES", there is a chapter heading: "Investment in a high quality landscape pays dividends as customers are willing to pay more for it". It is likely preparation of brownfield sites may be expensive to develop. Hence there is thus the risk that developers will seek to preferentially develop in released GREEN BELT, thus leaving unused brownfield sites still abandoned and unused. The Council should take note that MOLE VALLEY COUNCIL are considering abandoning their "Housing and Traveller Sites Plan REKS20131405C-015" in the light of this new guidance.

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21. More specifically there are other concerns about the site and the proposed 133 dwellings. This is likely to generate at least 133 traffic movements off the site in the morning and evening and there must thus be concern over access. Access cannot be off the bypass (A58) as any access would have to be on the crown of the bend where traffic would be at maximum speed. In contrast the access to and from the Safari Park is on the outside of the curve of the A58, with deceleration and acceleration lanes with good sight lines. Access off the upper part of the

bypass was considered inappropriate for the school when it was being built and the proposed access had better sight lines and was on a straight part of the bypass. If the access was onto KNOWSLEY PARK LANE, then this would add to the existing chaos that reigns twice a day when there is school traffic. If the access was off Liverpool Road where the Garden centre access is situated, then as the road is a dual carriageway all traffic would have to turn left while those wishing to go to the M57 or down into LIVERPOOL would be tempted to make a U-turn by the CLOCK FACE Public House, with significant risks of accidents. If the access was to be at the traffic lights opposite MANCHESTER ROAD, then this would contribute to congestion given the sequencing requirements of the junction. There is also the question of infrastructure to support 133 house such as school places, and access to General Medical Practitioners. The traffic generated by the vehicles movements on and around the site would also contribute to more environmental pollution.

22. There are concerns too about the site from a housing and traffic perspective. The traffic on the Prescott bypass generates significant background noise, which would be a problem for anyone purchasing buildings on the site. There is dampness in the centre from springs and streams, and thus a risk of flooding and even of householders being unable to secure appropriate insurance. In addition there could be contamination of the land, which would require management.

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25. There are also concerns about wildlife. The hedges provide an environment for birds, small mammals have been seen on the site, and bats are also seen and may be roosting in buildings either on the site or close to it. It is noted that KNOWSLEY claims according to items in a display cabinet in the HUYTON ONE STOP SHOP, to be Britain's GREENEST BOROUGH and in addition has 16 GREEN FLAG PARKS. There is also the KNOWSLEY GREEN SPACE STRATEGY, which discusses the benefits of green space especially chapter 5 and paras 6.3a and 7.2.

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these areas of land be removed from the protection of the GREEN BELT status, there could be planning applications for FRACKING.

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Yours faithfully,

John Sills

Dr J.A.Sills

Local Plan Team,
Knowsley Council,
1st Floor Annexe,
Municipal Buildings,
Archway Road, Huyton, L36 9YU.



9.11.2014

Dear Sirs,

Re KNOWSLEY LOCAL PLAN-PUBLIC CONSULTATION.
LAND BOUNDED BY A58. (Whitaker's triangle).
together with similar proposals
for KNOWSLEY LANE and CARR LANE.

1. The Council have not publicised this matter as widely as in my view they should. Consultation (1.36 & 1.37 : CS09c: p8-9) is claimed to have been wide ranging and innovative. The first indication in my area was a notice placed on a lamp post, followed by a letter through the post. Given that this is a matter that affects the whole town surely the Council should have made every household aware of this very important matter. It seems to be the case that the owner of Dye House in the southwest corner of the A58 land/ Whitaker's Triangle was not informed about the proposals to remove the land from the GREEN BELT. It is a further reflection of the lack of publicity that when I went, as advised, to the PRESCOT ONE STOP SHOP to view the documents, none of the staff on the desk appeared to know anything about this PLAN and they had to phone round before discovering that the documents were to be found in a plastic basket. I did not see any publicity about the PLAN in the ONE STOP SHOP. For such an important public consultation it seems as if the Council have done the minimum required. Furthermore in the letter there is reference to a PUBLIC CONSULTATION with an examination in public in November 2013 and July 2014. I have no recollection of being informed of such an EXAMINATION IN PUBLIC, and given the importance of such an examination on the GREEN BELT. had I been informed I would have made representations to the Council and the INSPECTOR. *Hence the LOCAL PLAN is unsound on the basis of the failure of the Council to carry out adequate consultation with the wider public. In particular the policies outlined Doc CS08c M049-65 Policy Ref CS1-CS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: p51: M168 (Doc CS08c: P51) new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC. The Council should therefore consider re-convening the public consultation process to take note of the views of local residents relating to the GREEN BELT proposals.*

2. It will be on record that this land was incorporated into the GREEN BELT in the early 1980's, following attempts to build office blocks on the land by SEARIDGE PROPERTIES. Councillor the late JIM LLOYD, the then Leader of the Council, was instrumental in the land being incorporated into the GREEN BELT. Among the grounds for this decision, which will be available in the Planning Department was that the land would serve to provide a buffer between PRESCOT and the conurbations on the other side of the M57. This land is thus part of the M57 GREEN BELT CORRIDOR, designated as a STRATEGIC GREEN LINK. It is also noted that NATIONAL POLICY requires that GREEN BELT BOUNDARIES once set should be permanent. It is also the case that the land on KNOWSLEY LANE and CARR LANE also form part of this corridor. The land on KNOWSLEY LANE is the first patch of green land after 8 miles. This land greets travellers

up PRESCOT ROAD from LIVERPOOL , when they go round the roundabout. Then on the second roundabout they are separated from the conurbation of PRESCOT by the A58/ WHITAKER'S TRIANGLE site on the other side of the PRESCOT bypass.

3. Surely before any land in KNOWSLEY BOROUGH is taken out of the GREEN BELT all available BROWN FIELD SITES should be used up, rather than taking the soft option, which developers seek, of releasing GREEN BELT LAND, which once lost can never be regained. There have been 7 houses up for sale in KNOWSLEY PARK LANE over the past 2-3 years and only 3 have been sold; two recently, one has been taken off the market, two are still up for sale and one is currently being divided into two units. There are also a number of flats in ELM HOUSE up for sale. Thus there does not seem to be any great demand for housing in the local area of WHITAKER'S TRIANGLE. It is also a matter of record that recently there have been major housing developments in the local area: on the old Boys Grammar School site on St Helens Road, and on the old BICC site, where there has also been significant retail development. There are figures which suggest that there are significant numbers of unoccupied properties, (2020 properties figures for 2012, Knowsley Local Plan Monitoring Report: para 3.65 p32, and a potential for 5636 dwelling sites available) which together with a view that the housing targets are ambitious rather than realistic, would mean that the housing target of 8100 could almost, (2020+5636=7656) be achieved without utilising the GREEN BELT. In addition in the SHLAA Report of 2012: para 8.3, p 30) there is reference to the Borough having 12.6 years of capacity rather than 15 years. It must be a possibility that as the 12.6 years approach the situation regarding available brownfield land may have changed. In this context relating to housing there is no reference to any consultation with any local housing trusts. The other concern relating to the release of land from the GREEN BELT is that development on these sites will be more attractive to developers, (not to mention the capital appreciation of the value of the land following change from GREEN BELT status), so there is thus a real risk that brown field sites will not be developed, and may remain as blighted sites in the Borough, as former GREEN BELT sites are developed preferentially. GREEN BELT land once released and developed is lost forever. Hence the GREEN BELT should be protected as recommended recently by the Secretary of State, ERIC PICKLES, whose views on the use of GREEN BELT land (15.1.10) include: "incursions into the GREEN BELT must only occur in exceptional circumstances and must be planned in a logical and strategic way". In Document Hearing Statement 5A from October 2013 there is also reference in para 5.1 to "exceptional circumstances" relating to GREEN BELT and in 5.1.1 the policy is amended to "Inappropriate development will not be permitted in the GREEN BELT unless very special circumstances can be demonstrated, and the visual and recreational amenities of the GREEN BELT will be preserved". The current proposals can surely not be regarded as being exceptional circumstances particularly in the context of the latest guidance.

4. The main planning objections relate to CORE STRATEGY: Doc CS08c M049-65 Policy Ref CS1-CS5: SU2, 2a, 2b, 2c, and in particular in Doc CS08c: M161, **p47: M157 and p51: M168 (Doc CS08c: P51)**, new Policies SUE1, SUE2, SUE2A, SUE2B and SUE2BC: "To bring forward new site allocations and policy guidance which will address the shortfall identified in the 5 year deliverable land supply for housing and the urgent needs for specific employment uses identified in the Inspector's Interim Findings (January 2014) and further matters identified during the Examination in Public".

5. It is noted (Doc CS09a p64) that the NATIONAL PLANNING FRAMEWORK, states the five purposes of including land in the GREEN BELT:

1. To check unrestricted sprawl of large built-up areas.
2. To prevent neighbouring towns from merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In the case of the land bordered by the A58 and indeed the land on Knowsley Lane, and Carr Lane, these three sites currently check unrestricted sprawl, prevent merging of neighbouring towns, assist in safeguarding the countryside from encroachment, and in the case of the A58 land help to preserve the setting and special character of PRESCOT. PRESCOT is described in 2.22 (CS09b: p18) as having an older historic core, and in 2.38 the town centre is described as an area of particular historic interest with origins dating back to medieval times and with strong connections with the 18th and 19th century clock and watch manufacturing industries. Prescott Town centre is one of the 15 Conservation Areas of the Borough (2.40), and abuts into the southwest corner of the A58 land/Whitaker's Triangle.

6. Policy CS5 (p52 of Doc CS209a) states that "inappropriate development will not be permitted in the GREEN BELT except in very special circumstances in which it has been demonstrated that the harm to the Green Belt would be outweighed by other considerations". In all submissions in para 6A (Doc CS209a) there is no specific discussion of the merits of this change in relation to the A58 land/Whitaker's Triangle. It is possible that there is a COVENANT on the use of the land established by the LORD DERBY, when the land was released for housing along Knowsley Park Lane, which should be clarified by the Council.

7. In 5.41A (CS09a: p54) it states that the Council wishes to allow further development within previously developed sites in the Green Belt provided the openness of the Green Belt is preserved.

8. In Policy CS8 (CS09a: para 1&2: p 69) there is reference, for example, to ensuring more attractive and cleaner neighbourhoods, sustaining and promoting biodiversity, preserving the character and function of historic environments and valued landscapes, to provide local opportunities for sport, mitigating the effects of climate change and flood risk, mitigating air, water and noise pollution to protect and enhance strategically important areas of green space, promote effective movement of wildlife through a network of green strategic links. In para 4e (p70) there is reference to the M57 Green Belt corridor as a strategically green link. Developing on the GREEN BELT will counter to these aims.

9. In chapter 6 the only reference to the A58 land/Whitaker's Triangle is in para 6.45 (p95) where there is reference to "Land to the North West of Prescott for housing" and in chapter 6A the reference is to SUE 1 site e. There is a generic reference to the site in 6A 11 and whereas in SUE 2: 3(p105g) there is reference to supplementary planning documents for sites a-c, there is no specific reference to e. However in para 6A: 19, there is reference to the lack of necessity for supplementary planning, with a comment that Planning Applications would need to demonstrate a comprehensive approach to delivery of development within the site and to the provision of any necessary infrastructure or developer contributions. There is thus nowhere in this document any discussion about the particular merits or otherwise of including the A58 land/Whitaker's Triangle in SUE 1e and taking it out of the GREEN BELT, and in particular there is no discussion about the northern 10 acres currently used as school playing fields during the week and at weekend

as pitches for local youth football teams. In this day and age, with the problems of weight in children, and indeed adults, there would seem to be no cogent reason to remove this part of the A58 land/Whitaker's Triangle from the GREEN BELT.

10. More discussion on this issue is however to be found in the Document SD32b "proposed Modifications Sustainable Appraisal Appendices". Incidentally this is a problem with attempting to comment on the Local Plan; there are so many documents that it is difficult to peruse them all, sift out the important paragraphs and collate a response. In this document in KGBS8, (pp198-202) there is reference to 3 options, for the A58/Whitakers site: 1) with housing density of 25dph, 2) allocation of the whole site and 3) housing with 30dph. The preferred options seem to be 1 or 3 as these two would keep the playing fields, whose benefits seem to be acknowledged. The benefits from removing the site from the GREEN BELT include a positive impact on reducing deprivation by stimulating investment and creating jobs in the construction sector (S1). This might be offset by losses from reduction of current commercial activity on the site at the Nursery. Each of the options would however result in housing being built on a predominately greenfield site and unless appropriate mitigation measures were implemented could also lead to loss of priority habitat and mature trees which contribute to the character of the area. Each of the options has the potential to have a negative effect on the objectives that relate to the local character of the landscape and biodiversity particularly if they result in the loss of protected trees and areas of woodland and detrimental to the visual amenity. Hence if there is to be development on the site trees, habitat and environment should be protected. The site is seen as having good access and transport links, with easy access to local facilities within walking distance (S2). There are concerns over traffic (see para 21). In S6 there is discussion about the type of housing envisaged, and there seems to be an aim to have high quality housing together with option 2 (30dph) providing the better opportunity to include affordable housing. S8 deals with preserving, and enhancing Knowsley's rich diversity of cultural historical and archaeological buildings, areas, sites and features. The discussion focusses on the relationship with, and status of, the Conservation Area, the needs of this area and the view that each option could generate additional investment in the area and therefore help contribute to the conservation and enhancement of these historic assets. Of the options there was a view that option 3 would have less scope to adopt a sympathetic design and that this option 3 had the greater potential to have a negative impact on the setting of designated heritage assets. E1 comments on the protection, enhancement management of the local character while E2 comments on biodiversity and viability of protected and endangered species, habitats, biodiversity, and sites of geological importance. It was concluded that while the site is in a narrow gap between Huyton and Prescot, development in the location would not significantly affect reduce the gap. E3 acknowledges that there is a flooding risk, but in spite of lack of information about groundwater flooding, it is stated that *only isolated* locations within the area are likely to suffer groundwater flooding. Many of these issues are discussed in the following paragraphs.

11. Hence for such a strategic and important piece of land to be included in proposals relating to removal of land from the GREEN BELT, without any specific justification does not seem to indicate that any degree of consideration has been given to the merits of this proposed inclusion.

12. Knowsley Lane is another site: SUE 2a, where the green belt is threatened and where the comments in relation to SUE 1a are just as relevant.

13. In the case of the land bordered by the A58 land/Whitaker's Triangle and indeed the land on Knowsley Lane, and on Carr Lane, these are all in the M57 corridor and currently check unrestricted sprawl, prevent merging of neighbouring towns, assist in safeguarding the countryside from encroachment, and in the case of the A58 land help to preserve the setting and special character of Prescott. The town is described in 2.22 (CS09b: p18) as having an older historic core, and in 2.38 the town centre is described as an area of particular historic interest with origins dating back to medieval times and strong connections with the 18th and 19th century clock and watch manufacturing industries. Prescott Town centre is one of the 15 Conservation Areas of the Borough (2.40), and abuts into the southwest corner of the A58 land/Whitaker's Triangle.

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Yours faithfully,

[REDACTED]

 John Sills

Knoxsley Local Plan

CHIEF EXECUTIVE

12 NOV 2019

WE HAVE READ THE SUBMISSION OF JONAS SILES AND AGREE WITH HIS COMMENTS - WE CONSIDER THAT KNOXSELEY GREEN AREA SHOULD BE PROTECTED PARTICULARLY THE ASB/WHITALEYS TRANGLE.

PETER REILLY

IAN J. CARRIER,

JANE REILLY

Paul Williams

John Holland

Johanna Robinson

M A Hudson

B Hudson

Rebecca

Mrs Fabian

Shen R

James Brady

A M SWIFT

J Thurgeson

J. Thurgeson

V. Haycock

Roy Haycock

Jennifer Stott

Julia McElhenny

Ron Stott

Jan Sumner

P. L. Francis

Lisa Ellis

Ken Pearson
Sean Atkinson

Ray Wood.
D Munn

D Mackie

Oneslott

~~John~~
John
P Cook

JAMES COOK

MR + MRS P A LONGWOOD

Dr E. J. Zwiderwijk

T W BIRCH

D. F. CALLAN

J. CALLAN

Paul Atkinson

MARK BURKE

S HARPER

GLENNEKDALE

Ann Nicholson

RANDALLS

R. Edward

Jeff Gilborn

~~Paul~~
Lee



Knowsley Council

Knowsley Plan: Strategy

Local Core

Knowsley Council

Proposed Modifications - Consultation Representations Form

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Miss	
Name	Julie Anne Parker	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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 J A Parker

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref M088 Policy Ref KGBS 17 Paragraph Ref 5.46A

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
a) Legally Compliant? (see guidance note 2.2)		
b) Sound? (see guidance note 2.3)		✓

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

SA

In the Infrastructure and development options study completed by Mott MacDonald 8/7/2014 relative to “ South Whiston and land south of the M62” .
The assessment is not sound as information is not factual.

Table 5.3 SWOT Analysis

Kings Business Park is almost full and Knowsley requires a successor B1 office Park'.....
There are 10 vacant units. This statement is not sound as there are a number of empty office units currently available on Kings Business Park and the landowners Commercial Property Developments have an option to increase the development of the business park for b1 use to the north of the site. I have attached an ariel view of the business park which demonstrates that the business park has potential to double in size – there are a number of planning documents available that support this application.

5.46A In the context of employment land, Green Belt release is required specifically to address Knowsley’s overall development requirements up to 2028 and beyond. The immediate release of Sustainable Urban Extensions is necessary to provide an improved range, choice and quality of sites to address specific employment needs. These include provision for a high quality business park (as a successor to Kings Business Park, which is almost fully developed) and large scale distribution and

Logistics centre.

Mr Pike, can you take into consideration the 'level of need' for further business parks when there are a number of empty units for multiple uses available on Huyton Business Park, Whiston Business Park on Fallows Way and Kings Business Park in Prescot all within a 3 mile radius of the proposed SUE of Whiston south greenbelt.

Please also note the historically low attainment figures and aspiration of school leavers and Knowsley Councils ability to deliver the Local Plan based on the consistent failings of Local Authority services in Knowsley,

Notably;

ONS area of Indices of Multiple Deprivation

Knowsley has returned £18 million of much needed and unspent funding

Childrens services in special measures

Low attainment levels in Knowsley schools

The failure to deliver North Huyton Communities Future redevelopment programme effectively – there is little visible regeneration in this area, despite the first phase of a housing development being completed. The Centre for Learning school in this area closed within 2 years due to under subscription, the community centre is considerably under used and there is little synergy between the newly built community of 250 families and the existing community which has directly impacted upon crime and increased void properties in this area.

I also stress that I first received correspondence relative to the local plan in September 2014 and feel that I have been excluded from consultation, I feel that there is not a robust evidence base to justify the early release of greenbelt and ask you to extend the period of consultation.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

In the Local Plan M0157 Para 6.45 should delete the words “, and SUE 2c “Sustainable Urban Extensions - South Whiston and Land to the South of the M62”) and necessarily the links and other references consequent throughout .

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date 14/11/2014



TOWN AND COUNTRY PLANNING ACT 1990

SITE ADDRESS: 16-21 Lion Court, Kings Drive, Kings Business Park, Prescot, Knowsley. L34 1EN

DESCRIPTION OF DEVELOPMENT: APPLICATION TO VARY CONDITION NO'S. 8 & 9 ATTACHED TO PLANNING PERMISSION 07/00746/FUL (ERECTION OF 6 NO. TWO STOREY OFFICES WITH ASSOCIATED CAR PARKING AND LANDSCAPING) TO ALLOW FOR DETAILS RELATING TO THE EMERGENCY ACCESS FACILITY & PEDESTRIAN ACCESS TO HUJYTON LANE TO BE SUBMITTED PRIOR TO THE COMPLETION OF UNITS 17-21 AND NOT ON COMMENCEMENT OF DEVELOPMENT (UNIT 16 CONSTRUCTED ONLY, 17-21 NOT COMMENCED TO DATE).

APPLICATION REFERENCE: 13/00283/FUL

APPELLANT'S NAME: Commercial Development Projects Ltd

APPEAL REFERENCE: A case heard by the High Court on 23/07/2013

APPEAL START DATE: 31 July 2013

A damning report into children's services in [Knowsley](#) said "widespread failures" were putting vulnerable children at risk.

Education watchdog Ofsted today branded Knowsley Council "inadequate" following an inspection of its services for children in need of help and protection, looked after children and those leaving care.

A review of the effectiveness of Knowsley's Safeguarding Children Board also concluded its performance was inadequate.

Inspectors said the council had a high turnover of social workers in assessment and safeguarding teams - and inexperienced staff were carrying out visits to children.

Ofsted's report said there were "significant weaknesses" in management, with a history of "infrequent and poor supervision" of social work staff. It said there had been improvements, but quality remained low.

Inspectors found record keeping was variable and often poor across social work teams. They said it was taking too long for children in care to be placed for adoption when it was in their best interest.

The report said: "Widespread failures and inconsistent practice across help and protection services leave some children and young people at risk of suffering harm.

"Too many children and young people who need help and support or who need to be cared for by the local authority experience drift and delay.

"Some have been left for too long in situations where they have suffered harm."

The report, published today, follows an inspection carried out at the end of April and beginning of May.

The report said senior council officers were aware of "significant deficits" in its services for children and families and an improvement plan had been drawn up - but it was too early to see any significant impact.

It read: "The local authority is aware of these weaknesses, and has developed an improvement plan.

"Recently appointed senior managers know what they need to do to improve the quality of practice and services for children and young people in Knowsley.

"However, remedial action is still at an early stage and significant impact is not yet evident in day to day practice."

New Deal for Communities

NHCF is the successor organisation to a central government funded programme known as New Deal for Communities (NDC).

This programme ran in Knowsley from 2001-2011 when the North Huyton area was awarded £55.8m to regenerate the area through a partnership board of local residents, ward councillors and agency representatives.

The funding was spread across 7 main themes in North Huyton: Health, Education, Crime, Employment, Housing, Youth and Community.

Over the 10 years, some 200 plus projects were commissioned by the independent Board to improve the performance of the area in comparison to the rest of the borough and elsewhere. This was achieved using a variety of in house and external delivery agents.

The North Huyton programme was rated as one of the leading NDC programmes in the country achieving 'excellent' status through the government's performance management framework.

Besides a comprehensive revenue based change programme, the Board also contributed to a number of key new build capital projects in the area including:

- 2 new Learning Centres
- Primary Care Trust Resource Centre
- Training and Skills Centre
- Youth Centre
- Community Centre



Councillor's anger as £18m of unspent funding businesses handed back to the Government

Oct 05, 2014 08:00

By [REDACTED]

Liverpool council cabinet member for skills [REDACTED] said the situation wasn't good enough



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[REDACTED] in front of the Forever 21 store and the Lobster Pot fish and chip shop on Whitechapel, Liverpool city centre. Picture [REDACTED]

UP TO £18m of funding meant to help local firms and workers was given back to the government by a Merseyside council after it went unspent.

The cash, which was to be spent across the region, was being handled by Knowsley

Improvement Notice

To: NAME Knowsley Metropolitan Borough Council ("the Council")
ADDRESS Archway Road, Knowsley L36 9YU

This Improvement Notice is issued to Knowsley Metropolitan Borough Council on 16 September 2014 following the findings of inadequate performance and arrangements for 'children who need help and protection', for 'adoption performance' 'leadership, management and governance', and for 'effectiveness of the Local Safeguarding Children Board' as identified in the Ofsted inspection report published 30 June 2014.

1. This Notice is given to address all the areas for improvement identified in the report of the inspection of services for children in need of help and protection, children looked after and care leavers and review of the effectiveness of the local safeguarding children board published by Ofsted on 30 June 2014.
2. To comply with this Notice, the following actions are required of the Council, working with its partner agencies ("partners") as identified by the Children Act 2004 (section 11), with clear evidence of improvement:

Understanding needs of children, young people and families

3. **Ensure that the needs of children and young people in Knowsley are reviewed and there is a clear statement of what children and young people can expect from services provided by social care and partners** by:
 - a. reviewing the Joint Strategic Needs Analysis and communicating a shared understanding of strategic priorities to staff and partners; with a clear focus on vulnerable groups who would benefit from help and protection, care and adoption.
 - b. setting out a process map of the children and family journey through the system including key transition points and target performance indicators;
 - c. ensuring the views of children and young people, their experiences and needs are gathered to inform individual care plans, the commissioning of services, improvements to services and that there is a system to record and report to the Local Safeguarding Children Board, the Improvement Board and children and families;
 - d. ensuring that children and young people are seen alone during statutory visits and their views recorded;

- e. ensuring social worker's report on child protection are shared with the family 24hrs before conferences; and
- f. ensuring that children and young people are provided with information about entitlements and how to complain.

Leadership, Management and Governance

- 4. **Ensure the Council sets out a statement of their vision and ambition** for children's services and an improvement plan ('the Improvement Plan') which sets clear objectives, timescales, outcomes and is supported by a data set including qualitative and quantitative information against performance indicators by 6 October 2014. Consideration should be given to, but not limited by, the *Children's Safeguarding Performance Information Framework 2012*. The statement and Improvement Plan should be communicated to and implemented by all staff including those in partner agencies. The Improvement Board ('the Board') is accountable for delivering the Improvement Plan.
- 5. **Ensure leadership, scrutiny and challenge is exercised** and impacts on the quality and effectiveness of safeguarding and looked after children services. By ensuring that:
 - a. effective assurance arrangements are in place within the Council and across the partnership in line with Department for Education (DfE) statutory guidance '*Roles and responsibilities of the Director of Children's Services and the Lead Member for Children Services*' and '*Working Together to Safeguard Children*';
 - b. elected members of the Council understand and deliver their corporate parent role for looked after children and meet all the statutory requirements, including statutory visits;
 - c. the lead member is supported by an experienced peer with a successful track record of providing political leadership in a Council that has gone through significant improvement following an inspection;
 - d. Council senior managers continue to consult staff and partners on the changes necessary to secure improved children services and that there is sufficient capacity to enable senior managers to implement the improvement activity and measure impact;
 - e. a culture of accountability is developed with managers, staff and partners holding each other to account with action taken when required to challenge poor and unacceptable performance; and
 - f. children's social care is represented on all key planning forums such as the Health and Wellbeing Board.

Early Help and Partnership Working

- 6. **Implement a prevention and early intervention strategy to provide children, young people and families appropriate support from early help to statutory intervention** by:
 - a. setting clear expectations that partners in health and the police play

- a full and active role in the identification and support of those who need early help and protection;
- b. developing and agreeing a local protocol for early assessment as set out in *Working Together to Safeguard Children* so all partners are able to respond to early needs and involve others as required;
- c. reviewing and monitoring the understanding, use of thresholds and criteria, and referral routes (including the take-up of CAF) by different partners;
- d. monitoring referral/re-referral rates and feedback from referrers;
- e. commissioning targeted services with partners with mechanisms for step-up/step-down between early help and statutory social care to ensure appropriate support and shared case leads across partners; and
- f. monitoring the contributions to, the use and impact of early help as made by all partners and to regularly report to the Board on this with recommendations to improve practice.

Quality and effectiveness of Practice

7. Improve the quality, timeliness and consistency of children's social care assessments by ensuring that:

- a. all assessments by the Council and partners follow the principles and parameters of a good assessment and are completed within timescales as stated in *Working Together to Safeguard Children*;
- b. all protocols are agreed and monitored and ensure information is shared in a timely fashion e.g. after key planning meetings where decisions are taken; and
- c. evidence, rationale and decision making for assessments are timely in being recorded.

8. Improve the quality, delivery and management of child protection practice and plans by ensuring that:

- a. all partners attend child protection meetings and strategy meetings and this is escalated and addressed when not occurring;
- b. child protection plans comply with the requirements of *Working Together to Safeguard Children* including ensuring that all plans include the views of the child, time bound actions, with assigned 'owners', and with measurable, success outcomes for children and young people;
- c. plans include review and evaluation points, with timescales agreed with other professionals along with information about their contributions;
- d. scrutiny, challenge and capability of Child Protection Conference Chairs is improved by having regard to statutory guidance;
- e. case records are regularly updated, in a timely fashion, to document any new or amended information, rationale and decisions as they arise; and
- f. evidence of management oversight, decision making and

appropriate action and chronologies, is set out in detail on each case file.

9. Ensure robust permanency, care planning and review of looked after children at the earliest point by :

- a. improving matching processes to ensure that the needs of children requiring long term placements are met;
- b. implementing a care planning tracker that is subject to regular review;
- c. clear systems are in place to ensure concurrent and parallel planning for children entering care;
- d. reviewing the procedures of the Independent Reviewing Officers to adhere to statutory guidance and to tackle any delays to the timescales set out in plans;
- e. ensuring there are sufficient foster carers and residential placements to respond to the needs of looked after children; and
- f. monitoring the educational achievement of looked after children against clear targets.

10. Improve the timeliness of adoptions by ensuring that:

- a. clear plans are in place to improve all aspects of adoption timeliness (local authority decision-making, placement orders, matching and placement);
- b. measures are taken to build on the introduction of recent new processes to address delays including the production of robust performance management information; and
- c. performance management information and a trajectory of likely impact on DfE's adoption scorecard indicators is reported and reviewed by the Board as part of the data set in paragraph 4.

Quality assurance, audit and management oversight

11. Ensure there is a robust and effective quality assurance framework to drive and evidence the impact of improvement with families, front line practitioners and key partner agencies that:

- a. uses quantitative and qualitative evidence, with a view to the effectiveness of practice and the degree to which it is safe;
- b. includes regular auditing arrangements of case files, with use of independent arrangements to review the quality and timeliness of recording and compliance in individual case records (as set out in *Working Together to Safeguard Children*);
- c. there is an agreed regular and planned approach (including the size and scope of audits), to update the Board on audit findings and analysis, along with recommendations to improve practice, which should also inform the work of the LSCB; and
- d. ensures recommendations and actions are measurable, inform improvements in practice, workforce development and supervision.

12. Establish effective supervision and management oversight by

ensuring that:

- a. all staff continue to have regular supervision;
- b. that supervision is reflective to promote learning, in line with agreed protocols, with training available for supervisors;
- c. social worker responsibilities and workloads are defined and reviewed with a range of work for staff consistent with their level of experience and competence (including protected caseloads for Newly Qualified Social Workers); and
- d. all management oversight (such as case discussion, supervision and audit) is conducted in line with standards set out in *Working Together to Safeguard Children* to ensure safe practice and decision making on individual child protection cases.

Staff capability and capacity

13. Develop a **workforce strategy** which is based upon an analysis of need. The workforce strategy must include clear recruitment and retention strategies, set out how poor performance and capability issues will be dealt with and an analysis of skills and training needs required to deliver good social work. It should be implicitly linked to the Improvement Plan, and clearly related to service plans and audit outcomes. The strategy should be aimed initially at reducing the dependency on agency staff and should include:

- a. support for newly qualified social workers is reviewed to ensure that it meets need and results in them becoming advocates for the service in Knowsley;
- b. a review of, and improvement to, tools and systems required to deliver good and agile social work including the electronic information system; and
- c. staff engagement and regular feedback to improve and shape practice using feedback mechanisms, such as staff surveys and report the results to the Improvement Board.

Local Safeguarding Children's Board (LSCB)

14. **Strengthen the LSCB so it can ensure that partners work together effectively and are held to account for their responsibilities** by ensuring that:

- a. there is action to improve the effectiveness of the LSCB, to ensure its compliance with the requirements of *Working Together to Safeguard Children* and that partners are fulfilling their obligations under section 11 of the Children Act 2004;
- b. multi-agency practice and individual partner audits are robust, with reporting to the Improvement Board on any key lessons and recommendations to improve practice;
- c. all partners are committed a shared set of priorities for safeguarding, child protection, and early help/intervention and

- prevention;
- d. all policies and training are reviewed and delivered to ensure understanding of thresholds in all agencies;
 - e. the LSCB learns from national lessons of serious case reviews and from LSCBs where effectiveness is considered good or outstanding; and
 - f. the chair of the LSCB reports progress to the Improvement Board meeting to inform the Improvement Board Chair's report to the Minister.

15. Taking account of the measures set out in this Improvement Notice the Council is expected to:

- a. Establish an Improvement Board ('the Board') and appoint an Independent Chair ("the Chair"). The Board is expected to meet at least every 6 weeks. If in the future the Improvement Board wishes to vary the frequency of meetings this must first be agreed by the Department for Education. An official from the Department for Education will attend board meetings as a 'participant observer'. The Board should include key partner agencies in its membership. The Council must provide the Chair with administrative support to a level sufficient for the Chair to undertake his/her role efficiently and for the Board to operate effectively. This to include provision to allow, at least 2 days every month for independent testing and validation.(either by the Chair directly or an independently appointed person on behalf of the Chair).
- b. The Council must develop an Improvement Plan by 6 October 2014 aimed at delivering improvements. The content of the Improvement Plan and a record of progress must be kept up to date. The Council must report to the Board on progress against the objectives in the plan and can commission updates from partners in order to do this. Reporting should include analysis and recommendations supported by reviewing performance trends against key data sets (which partners should agree) including quality of service and outcomes for children and young people. The Council should highlight those objectives which are slow to progress and highlight where contributions need to be strengthened.

16. The Council should aim for actions included in the Improvement Plan to be delivered within 18 months of the Ofsted inspection. The objectives and performance trends will form part of the discussion at formal review meetings with the Department for Education.

Improvement against the above measures will be assessed as follows:

- 17. The Improvement Board Chair must provide to the Parliamentary Under Secretary of State for Children and Families a written progress report against the areas set out in this Notice by December 2014 and every three improvement boards thereafter. The Chair's report should be based on

independent testing and validation of improvements.

18. In parallel, the LSCB Chair should also report to the Improvement Board meeting on progress to improve its effectiveness.
19. Progress reviews will be conducted by DfE officials and take place every six months until this notice is lifted, or at the specific request of the Department. Prior to the review, any Improvement Board Chair's report for that period will be supplemented by a Council report of progress against the improvement plan submitted to DfE a week in advance of the review. Such reviews may result in an amendment to this Improvement Notice and further action being required.

Failure to comply with this Improvement Notice by the assessment dates or poor progress:

20. Should the Council be unwilling or unable to comply with this Improvement Notice, or should ministers not be satisfied with the Council's progress at any stage, ministers may choose to invoke their statutory powers of intervention (s497A Education Act 1996) to direct the Council to enter into an appropriate arrangement to secure the improvements required in children's services.

Signed on behalf of the Secretary of State



.....

Dated : 16 September 2014



North Huyton Action Area Supplementary Planning Document

Knowsley Metropolitan Borough Council

February 2007

(Copy of Document PP05 provided)



**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	Miss	
Name	Julie Anne Parker	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation J A Parker

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref 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.

Mr Pike,

I believe that the Sustainability Appraisal of Knowsley Local Plan: Core Strategy Proposed Modifications – September 2014 is unsound and fails to properly examine the impact of SUE2c on the Environment objectives E.2

I believe that this proposal is not sound as it does not take into account a number of national studies and best practice from national bodies relative to retaining urban greenbelt land and conservation of priority habitats. It does not take into consideration that the loss of greenbelt in this area, the 6th most deprived borough in the UK, will have on the surrounding community within Whiston. I believe that the release of this land to housing will have a detrimental impact on the local wildlife, well-being, air quality and impact of climate change which will resonate throughout surrounding communities. I would also request that you consider it not to be 'sound' to conduct a habitat survey in October when many species are dormant or in hibernation. In addition to this I ask you to consider the soundness of a 'desktop' habitat survey is adequate to accurately determine the significance of any adverse effects on habitats, conservation and bio diversity of this greenbelt land.

Please take into account the following references from specialist organisations and academics;
The proposed 'A Nature and Wellbeing Act' has been proposed by RSPB and The Wildlife Trust in a direct response to the following;
The State of Nature Report concluded that

- a) We have quantitative assessments of the population or distribution trends of 3,148 species. Of these, 60% of species have declined over the last 50 years and 31% have declined strongly
- b) Contact with nature has many proven physical and mental benefits.
- c) Since more than 80% of the UK's population live in urban areas, it is essential that people living there are provided with sufficient opportunities to experience nature –it may be the only chance they get.
- d) It is clear that people need nature, but the reverse is also true – we need to inspire the next generation of conservationists to tackle the ongoing problems faced by wildlife. The only way to do this is to help people experience, explore and understand the natural world, because people won't protect what they don't know and love.
- e) Of 1,064 farmland species for which we have trends, 60% have decreased and 34% have decreased strongly
- f) One estimate suggests that access to quality green space would save the NHS £2.1 billion pounds annually, because of the health benefits it provides.
- g) The state of the UK's butterflies (2011) concluded that 72% of species had decreased over the previous ten years, including common "garden" butterflies that had declined by 24% at Knowsley Metropolitan Borough Council's Green Space Strategy Conference in 2014,(Elsewhere Professor John Emeritus Bird of Manchester University advised that the greenbelt running adjacent to M62 motorway acts as a 'gateway' for butterflies and other invertebrates and this corridor of travel into other neighbouring boroughs is imperative for the breeding and conservation of such species).
- h) The state of the UK's birds (2012) reported that the UK has lost in the region of 44 million breeding birds since the late 1960s.
- i) The decline of these important nectar and pollen sources has had a knock-on effect for insect pollinators. Of the 97 food plants that we know bumblebees prefer, 76% have declined over the past 80 years¹⁸. As bumblebees are pollinators of some commercial crops and many wildflowers, threats to their populations may have far-reaching consequences for farming, people and other wildlife(Mr Pike if you can again note that Knowsley has 2 predominant 'attractions of interest' 1i)Knowsley Safari Park and ii)The National Wildflower Centre-loss of Knowsley bee population and natural wildflower conflicts with the aims and objectives of Landlife(a wildflower conservation charity) whom established 'the national wildflower centre' in 1999. Indeed there strapline is "Landlife works for a better environment by creating new opportunities for wildflowers and wildlife and encouraging people to enjoy them" Indeed as mentioned on the home page of the national wildflower centres website which is located just 3 miles from the green belt south of the Whiston "We are working in close partnership with Knowsley Council 'The Wildflower Borough', making new landscapes for communities. Releasing land that has an abundance of natural wildflower conflicts the mission statement of Knowsley's premier attraction, source of tourism and contribution to local economy, I would suggest that Knowsley Council and Landlife should do everything possible to showcase Knowsley as the green and flourishing 'wildflower borough' and by releasing greenbelt adjacent to the main thoroughfare in and out of Knowsley (The M62) does not reflect the outstanding work delivered by both Landlife and other environmental conservation charities operating in Knowsley who's key aims and objectives (as per the charity commission website' are to enhance and protect and conserve the natural environment'
- j) In this context ; In the South Whiston and Land South of M62 Habitats survey it is reported "Grey Partridge (*Perdix perdix*) is present and that the UK population of Grey Partridge declined by 88% between 1970 and 2005 and though still widespread shows distinct variation according to agricultural practices. In North Merseyside there were an estimated 300 pairs in 1997-99 and they are present in all suitable habitat. Loss of suitable habitat is the main cause of decline in this species, with changes in agricultural

practices being particularly detrimental. This proposal will exacerbate the decline of this species.

k) Urban wildlife plays a crucial role in enriching people's lives: without it, many people would have no access to nature and all the benefits it brings, by contrast Stadt Moers Park(on the site of a former landfill disposal site) is in dire need of improvements, currently the park is underused with the majority of the local community preferring to use greenbelt for recreational and leisure use. The park path ways are congested with dog excrement, debris from 'burned out' vehicles, graffiti, overflowing or full bins. Attempts to create a more appealing 'nature reserve' for the community have failed, as to as attempts to increase footfall into the park for recreational use for e.g. despite a robust promotional campaign, British Cycling Associations 'Skyride' community bike ride held on Sunday 24th August 2014 attracted just 1 participant from a neighbouring borough. The greenbelt in Whiston is widely regarded as 'the hub' of the community. Knowsley Council reference on a number of occasions throughout the core strategy their objective is to 'create resilient communities' Mr Pike I ask you to acknowledge that a resilient community already exists in Whiston, where neighbourhood values and a small 'rural community feel' are common place, despite being located in an area of multiple deprivation Whiston residents know each other by name – I moved to this area less than 1a year ago and having worked professionally within Knowsley for a number of years I can assure you that no other township in Knowsley has embedded community values as displayed in Whiston.

l) The UK's increasing human population means more pressure on urban green spaces, and less room for wildlife. Of the 658 urban species for which we have data, 59% have declined and 35% have declined strongly. Invertebrates are doing particularly poorly in urban environments with 42% (183) showing strong declines.

m) Half of the species assessed have shown strong changes in abundance or distribution, indicating that recent environmental changes are having a dramatic impact on the nature of the UK's land. There is also evidence to suggest that species with specific habitat requirements (such as those found in ancient woodlands, wet woodlands and wetlands)are faring worse than generalist species that are better able to adapt to a changing environment

In respect of E8

n) Climate change is having an increasing impact on nature in the UK. Rising average temperatures are known to be driving range expansion in some species, but evidence for harmful impacts is also mounting. We should act to save nature both for its intrinsic value and for the benefits it brings to us that are essential to our well-being and prosperity. Mr Pike can you also consider that South Whiston is 'sandwiched' between 2 major motorway networks M62/M57 the latter merging into a 3rd highway 'The Knowsley Expressway'(A5300) This extract is taken from Knowsley Council's Local Pinch Point Fund Application Form to DoT for expansion and junction improvements of A5300. As the number of new homes in Knowsley increases by 3,000 over the next five years and money is invested in development sites and job creation, improved traffic flow will be critical in assisting much needed regeneration and growth. Going forward, based on all trip purposes, the Liverpool City Region Transport model (LCRTM) projects a 3% increase in trips to and from Knowsley to the rest of the LCRTM study area by 2024. This represents around 12,000 additional trips, per weekday, in each direction. The LCRTM taking into account housing and employment growth in Knowsley (not Liverpool or Halton) and including improvements to the A5300/A562 junction, projects that by 2024 the A5300, A562 and A561 will all exceed a volume over capacity ratio of 85% during the AM and PM peaks. 16384 tonnes of CO₂ being emitted per year from A5300 in its current position pre expansion and pre opening of the Mersey gateway and the additional traffic flow associated with this. It concerns me that such increase in volume of traffic, particularly freight traffic will only increase poor air quality produced by traffic and traffic congestion which will exacerbate respiratory disease in Knowsley.

o) Knowsley Public Health Annual Report 2014 states that there were 402 deaths due to lung cancer in Knowsley between 2010 and 2012, 31% of all cancer deaths. Of these deaths, 198 were people under the age of 75.

The rate for premature lung cancer mortality during 2010-12 was 41.1 deaths per 100,000 population, significantly higher than the rate across the whole of England (24.7) and the North West region (31.0). Knowsley had the 10th highest premature lung cancer mortality rate in England during 2010-12, out of 326 local authority areas

Knowsley had the 5th highest premature COPD mortality rate in England during 2010-12, out of 326 local authorities.

There were 718 deaths from respiratory disease between 2010 and 2012 in Knowsley, about 239 per year - this accounted for 17% of all deaths in Knowsley. Of these deaths, 205 were people under the age of 75. The premature mortality rate from respiratory disease in Knowsley between 2010 and 2012 was 42.0 deaths per 100,000 population. Greenbelt land and associated woodland is critical to off-setting carbon emissions generated from increased traffic flow and planned business growth of local business and industrial parks, increasing urban sprawl in this area will have a detrimental impact on air quality in Whiston.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Delete the words “, and SUE 2c Sustainable Urban Extensions - South Whiston and Land to the South of the M62”) and necessarily the links and other references throughout”.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

p) 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

A solid black rectangular box redacting the signature.

Date 13/11/2014



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
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	K Brown	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Mr K Brown

1. To which proposed modification to the Core Strategy does this representation relate?

3 Green Belt Sites: A57/A58/Knowsley Park Lane, postcode L34 (Beesley & Fildes site); farmland between Knowsley Lane and M57 postcode L34; land between Carr Lane and M57 Prescot postcode L34

Modification Ref

Policy Ref

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Main document refs (though many other refs involved): Doc CS08c: M168; M161; M157

It is widely regarded amongst local people that this Plan has not been prepared with the participation of the greater local community – the vast majority of local residents had not heard of these proposals until recently (September 2014). Only a limited number of people have received written notifications; there appear to be hardly any visible notices on display for the entire stretch of the main road perimeters for the A57/A58/Knowsley Park Lane site; it has been reported that there has been difficulty obtaining Representation Forms from the local library/One Stop Shop. (all contrary to Statement of Community Involvement report)

The Plan does not appear to show how Knowsley Council has arrived at the choice of the above three stated Green Belt sites, when in particular **there are so many brownfield sites extant in the surrounding area, together with the fact that an extensive and ongoing house building programme has been and is underway in the area, together with the creation and development of extensive business and retail sites in the area.** (contrary to Sustainability Appraisal report)

Continued on separate attached sheet

Representations Form – Continuation Sheet for Mr K Brown

Knowsley Local Plan: Core Strategy - Proposed Modifications – Consultation

Section 3 continued

The first two named green belt sites (A57/A58/Knowsley Park Lane and farmland between Knowsley Lane/M57 postcode L34) form a natural boundary between the sprawling outer Liverpool housing estates and the historic Lancashire market town of Prescot which sits on a small hill. Any development on these sites would only serve to merge these two distinctly different settlements closer together. (contrary to National Planning Policy Framework document, Town and Country Planning Regulations)

All three named green sites variously support a variety of flora and fauna and farm animals. They are an inherent part of the town and its surroundings, affording most welcome and aesthetically pleasing views. Whilst these Green Belt areas may perhaps look on a map to be relatively small contiguous areas of the surrounding residential space the reality on the ground is that they are such important, rare and attractive oases of green space, fresh air and relative beauty. **The locations immediately beyond these Green Belt sites would also be compromised in terms of quality of life, views and open space, excess traffic and congestion on already busy roads, further diminution of air quality, further noise pollution, further light pollution, etc.** (contrary to National Planning Policy Framework document, Town and Country Planning Regulations, Sustainability Appraisal report)

Summary: for the reasons outlined in this section it is believed that this Plan is not justified, is not consistent with national policy, is not effective and is not positively prepared.

Attached are names and addresses of supporters of this Representation.
N.B. this list represents only a small cross section of supporters as time was not available to canvas further.

Mr K Brown



4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Full use should be made of available local brownfield sites (of which there are many) before any green belt land is offered. Consideration should also be made of the already extensive house building, business and retail developments that have already taken place and are ongoing in the local area.

If the use of e.g. the site bordering A57/A58/Knowsley Park Lane were to change then a far more worthwhile initiative would be to turn it into prime agricultural land: at a time when it is generally accepted that this country is not sufficiently meeting its food production needs, this would also echo and support the views of current Secretary of the Environment Liz Truss.

Particular attention should be paid in this case to the Government's recently (October 2014) published Guidance to Reinforce Green Belt Protection e.g. "Established green belt boundaries should only be altered in exceptional circumstances under **updated** guidance published by the Department for Communities and Local Government (ref updates to the Planning Practice Guidance document).

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature



Date

9/11/14

Name

Address

Jeffrey D Engel (Rev)

Illus

Amanda Fearn

STELLA RUDEN

PHIL RUDEN

KAREN MCCORMACK

IAN MCCARTHY

BRENDA BURGESS

Catherine

Kwasnicki

Andrew

Kwasnicki

RAY INWOOD

CAROLINE INWOOD

Lauri Moran

James Millican

Miss M. Austin

J.H. Auto

Name

Address

A. E. SHERLOCK
DAVID CARNBY
A. GREEN
V. GREEN.
G. TOWN
C. TOWN
J. MURRAY
M. M'EGAN.
RICHARDS WOBSTON
MICHAEL COCHLAN
DAVID CALLAN
L. CONROY
R. TAYLOR
C. HANSON.
A. MOODY
M. BLACK
E. BLACK
A. PRESCOTT
P. Prescott
L. GREGORY
R. ASHCROFT
J. BRECK
R. DEUBLIN.
K. JONES
Dromedary
G. ROBERTS

Name

Address

STE OAKES

C SALMON ✕



MICHAEL GLENK



IRENE GLENN

I Joann





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	K Meredith	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055 to

Policy Ref

KGBS 14

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The Local Plan is unsound due to the failure of the council to carry out adequate consultation with the public. I would maintain that the policies outlined in CS1 to 5 and the SUE documents are out of step with Public opinion, especially as most of my neighbours have only just heard of the proposals to build on Green Belt at South Whiston. I would ask that the public meetings with the Inspector be re-convened to take into account the views of local residents and stated by the Government in the Localism Bill.

I would further state that the Knowsley Local Plan does not take into account the latest Data from the Office of National Statistics in relation to population growth, and that the projections in the local plan are out of date and not relevant to 2014.

The local Plan does not address latest statement from The Rt Hon Eric Pickles MP, the Secretary of State for Communities, which states “Planners must protect our Green Belt” see link below:

<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

This statement reinforces the need to protect Green Belt as contained within the NPPF, and that exceptional circumstances must be clear before release of Green Belt. Except to make profit for developers I can see no exceptional circumstances exist in Whiston. The North West does not have the Housing shortage that London and the South east has, and as such removal of Green Belt should not be considered in our case.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

I would also object to the release of green belt because Knowsley council have not proved that they have considered every Brown Field site, and that the early release of Green Belt will delay the development of brown field sites, as stated by Mr Jonathan Clarke at the original hearings.

Knowsley have not considered empty housing within the borough, as they have a very poor record of bringing empty and derelict housing back into use. I can find no reference to any consultation with local housing trusts. It has not considered other council holdings such as redundant schools, conversion of employment land, more intensive use of land already identified and windfalls which the government have expressly stated should be considered in any SHLAA

Knowsley council have not consulted with other bordering councils, especially as the building programme within St Helens and Halton are well advanced and may take up some of the housing requirement of Knowsley. Liverpool Council(LC) consider that the large amount of Green Belt release proposed by Knowsley is too much and may be premature, and that no contact has been made with Liverpool – these comment come from Mike Eccles(LC Development Manager) response to original inspections. There is a Duty to Co-Operate which has not been considered.

Green Belt is also supposed to stop urban sprawl, Knowsley already touch Liverpool at Huyton and the Proposals at South Whiston will bring us up to the boundary with St Helens. The Proposal in Cronton will bring us closer to Halton. This is not consistent with National Policy.
Continued on separate attachment.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

Date 13/11/14

Attachment – Objections to KGBS 14

<p>E1 To protect, enhance and manage the local character and accessibility of the landscape and countryside across Knowsley</p>	<p>Although some of the locations that would be released from the Green Belt contain areas that have been previously developed and other policies in the plan will seek to protect landscape character, each of the options could support the release of areas of greenfield land and have a negative impact on landscape character. As such, each of the options has the potential to have a negative impact on the objective. However, Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being ‘called in’ by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term. It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward</p>
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Objections:

- The purposes of Green Belts in planning policy are clear – to protect the countryside from urban sprawl and to retain the character of towns and cities (Natural England, 2010). The proposal to release the Green Belt in South Whiston will exacerbate urban sprawl and 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 12th century (Merseyside Historic characterization Project, 2011). The loss of this natural landscape held within the very last of the Green Belt in South Whiston would see the complete eradication of all the historic character that currently remains. The heritage of South Whiston would thus be lost for all current and future residents.
- Whiston is a ‘village’ with a village community. The proposed development would eradicated this village community as numbers would be too great for the community to be considered a village any longer.

E2	Each of the options could support the release of
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<p>To protect, enhance and manage biodiversity, the viability of protected and endangered species, habitats, geodiversity and sites of geological importance.</p>	<p>land from the Green Belt to meet the Borough's housing and employment needs. A number of these Sustainable Urban Extensions contain Local Wildlife Sites and others are located in close proximity to them. In addition, as significant number of the Sustainable Urban Extensions also contain areas of priority habitat. As such, each of the options has the potential to have a negative impact on the objective, although it is acknowledged that other policies in the plan seek to protect biodiversity and features of ecological importance. Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning approvals being 'called in' by the Secretary of State due to these locations remaining in the Green Belt. As a result, it is uncertain whether this option would have any significant impact on the objective in the short term as it may not provide the certainty for the development industry required to guarantee the necessary investment to bring such sites forward for development.</p> <p>It could however still have a negative impact on the objective in the longer term as the sites in the Green Belt do start to come forward.</p>
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Objections:

- The protection, enhancement and management of the remaining area of ecologically isolated green belt will be rendered a belated and insufficient attempt to restore/protect/fix what has already been lost.
- Ecological dispersal and colonization of protected and endangered species will be prevented via fragmentation of vital habitat networks; inadequate dispersal of species will cause a local and regional extinction of nationally significant and endangered species. (Harrison and Bruna, 1999)
- Agricultural land adjoining Big Water and Old Wood is currently providing essential refuge for nationally endangered, red listed grey partridge, a victim species that relies on farming systems for its food source and habitat. (RSPB, 2014). There is a significant population throughout the agricultural land surrounding Big Water and Old Wood. Nationally 87% of the population of grey partridge has been lost since the 1970's, a direct result of habitat fragmentation and loss. It can be expected to deteriorate further owing to the potential loss of the agricultural green belt of South Whiston.
- The agricultural land adjoining Big Water and Old Wood provides refuge and food source for sky lark which has reduced nationally in population by 62%, overall farmland bird species which have reduced by 56%, and lapwings which have fallen in population by 76% since the 1970's (RSPB, 2014). This land is also the hunting, nesting and breeding grounds of buzzards and barn owls the numbers of which will be directly and severely impacted by the loss of the agricultural green belt in South Whiston. So too the population of their prey of field mice, voles and rabbits.
- Impact of human activity upon the remaining area of Greenbelt, i.e. Big Water and Old Wood after development has taken place would have a detrimental effect upon the quality of natural habitats and upon all local species. Increase in human population in addition to the close

proximity to the remaining Greenbelt will further degrade the natural environment as a result of vandalism and overall human impact.

- Without sufficient connectivity of green corridors the isolated patches of Greenbelt will suffer a loss of biodiversity and environmental quality. Current natural linkages connecting Stadt Moers to the South Whiston Greenbelt would be disconnected by the proposed development, preventing colonization and migration of species.
- Migrating water fowl e.g. Swans, Canadian Geese, Coots, Moorhens, Herons which frequent big water will diminish due to the encroachment of urban sprawl. This will have a detrimental effect upon the quality of Big Water fresh water habitat as they naturally manage the fresh water habitats.
- Had a full ecological and habitat survey been undertaken by KMBC it would have established, in summary, that the urban fringe woodland of Old Wood and Big Water, and supportive agricultural land, all within the green belt of South Whiston, was essential to the conservation of the abundance of wildlife and thus their sustainable future.

<p>E3. To adapt to climate change including flood risk.</p>	<p>The Strategic Flood Risk Assessment identifies that a small part of the southern section of the site is at risk of fluvial flooding. This risk of flooding will be exacerbated by climate change and this part of the site should only be considered for development as part of a sequential approach. It is recognised that the identified capacity of the site has been derived from the assumption that the portion of the site within Flood Zones 2 and 3 will be excluded from the developable area and unless this is the case, and the other identified mitigation measures are implemented, the proposals could have a negative impact on the objective and its sub-objective of reducing flood risk.</p> <p>The Preliminary Flood Risk Assessment indicates that the site also falls within an area that is susceptible to ground water flooding. Nevertheless, the PFRA does recognise that there is a lack of local information in relation to groundwater flooding and that the dataset used only identifies wider areas that may be at risk from groundwater flooding. Accordingly, the information on groundwater flooding is caveated by the acknowledgement that only isolated locations within the overall susceptible area are likely to suffer the consequences of groundwater flooding. Nonetheless, the proposals would result in a significant area of greenfield land being replaced with built development which may have an adverse impact on levels of surface water run-off if suitable measures are not implemented, such as sustainable drainage systems.</p> <p>The proposals would also result in the loss of a greenfield site that has the potential to provide habitat for species and help mitigate higher summer Temps associated with climate change.</p>
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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 & increase the quality of the accessible green infrastructure network. By contrast, there is a higher degree of certainty that Option 3 would have a negative impact on this objective as it would not offer the same level of protection to areas of Public Open Space.</p>
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Objections:

- The provision of parks and open spaces in deprived areas such as Knowsley is worse than in affluent areas. The removal of this area of Green Belt would severely impact the deprived residents of this area of Knowsley.
- The higher the quality of the green space, the more likely it is to be used. To build over 1500 houses on Best & Most Versatile Grade2 Agricultural land cannot enhance green infrastructure. Every one of the options would result in the loss of large area of essential open green space. This area of Green Belt is THE VERY LAST piece of Green Belt in South Whiston and as such is the highest quality of open green space in the South Whiston area.
- Open green space is essential to health and well-being especially for mental health and preventing and combating mental health issues. Knowsley MBC would be failing in it’s care of, and provision for, it’s residents suffering mental health issues should this area of Green Belt be developed.

<p>E6. To protect, manage and restore land and soil quality.</p>	<p>Although Options 1 and 2 would support the retention/provision of some areas of public open space, each of the options would result in the loss of a substantial greenfield site. It is also noted that the majority of the site is classified as Grade 2 Best and Most Versatile agricultural land and that parts of the site are presently within agricultural use. It is therefore considered that each of the options have the potential to have a significant negative impact on this objective and also on the sub-objective of directing new housing to previously developed land. There is a higher degree of certainty that Option 3 would have a negative impact on this objective as it could also result in development on the greenfield parts of the site that are existing areas of Public Open Space.</p>
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Objections:

- The majority of the site is classified as Grade 2 Best and Most Versatile agricultural land and has been farmed for many years. None of the options will meet the objective to restore land and soil quality. UK soils store over 10 billion tonnes of carbon in the form of organic matter. The size of this store means soil has a vital role to play in helping to combat climate change. “Preventing emissions from soil and exploring how to increase existing stores of soil carbon can make an important contribution to meeting the Government’s emission reduction targets and carbon budgets, introduced by the Climate Change Act 2008”. Defra, Soils Policy Team

<p>E7. To protect, improve and where necessary, restore the quality of inland, and estuarine waters.</p>	<p>The site is in close proximity to a number of bodies of water, including Big Water. Directing development to locations close to these features has the potential to adversely affect water quality unless adequate mitigation measures are adopted. It is however recognised that there is limited certainty about the impact of development in this location on the water quality. In addition, it is noted that each of the options could result in the remediation of any contamination on the site and thereby eliminate a potential source of pollutants for this watercourse. As such, the impact of each of the options on the objective is uncertain.</p>
--	--

Objections:

- It is critical that this precious resource is managed properly to ensure that the needs of society, the economy and wildlife can be met and maintained in the long-term. Surrounding Big Water Lake with a vast housing estate of over 1500 houses must surely impact on the quality of water in the local area. The lake in this area is used for recreation and fished regularly by a local club, it is considered “Good Fishing” one of its advantages is its rural location. We have seen no mitigation of negative effects on water, suggested by Knowsley Council.

<p>E8. To protect, and where necessary, improve local air quality.</p>	<p>The proposals are likely to result in an increase in traffic in the immediate surrounding area but it is recognised that the extent to which this will impact on air quality is uncertain and the site is not within an Air Quality Management Area. It is noted that there are a range of local facilities and amenities that are readily accessible from sections of the site including primary schools, a GP and health centre & a local shopping centre on Greene’s Road. It is also recognised that there are existing employment areas located in close proximity to employment sites, such as the industrial and business estate on the opp side of Windy Arbor & Huyton Bus Park which may reduce the need to travel for work. Nevertheless, these community facilities are some distance from the eastern and southern sections of the site and only the northern sections of the site are within 800m of Whiston railway st & not all of the site is in close proximity to the existing bus routes on Windy Arbor & Lickers Lane. The proposer of the site has also stated that the proposals would include on-site facilities, the provision of new bus routes through the site and that the development would be designed to encourage walking and cycling. Both Options 1 &2 would support the provision of some facilities on the site although there is still some uncertainty over what facilities would be provided on site and the degree to which these would be accessible from all parts of the site and surrounding areas. Consequently, due to the number of trips that a development of this scale would be likely to generate, it is considered that each of the options has the potential to have some negative impact on the objective. There is a higher degree of certainty that Option 3 would have a negative impact on the objective as this approach would not necessarily support the provision of on site facilities.</p>
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Objections:

- It is highly unlikely that a development of over 1500 houses would improve air quality especially if you take into account the level of traffic increase. The suggestion that walking to Greenes Road is an option for a non car owning elderly or young person in winter is a non-starter. Bus services are poor in Whiston at best and non-existent after 8pm at the southern end of Windy Arbor Road.
- “Our farmland and countryside can produce high-quality food and support wildlife when trees play a part in the landscape. We all breathe easier when there are beautiful woods in which to

relax and unwind. And yet the UK needs more trees. We are one of the least wooded countries in Europe and trees and woods continue to disappear from our landscapes”. *Woodland Trust*

- There is a need to reduce the need to travel by car and increase the use of more sustainable forms of transport. Economic activity rates and incomes are lower in Knowsley than the NorthWest average.
- There is a need to retain a greater proportion of retail expenditure within Knowsley to enhance the vitality and viability of the Borough’s town centres.
- 2 of the 15 conservation areas in Knowsley are included on the latest Heritage at Risk register;
- Access to areas of natural and semi-natural open space is poor in parts of the Borough;
- There is a need to conserve and enhance the natural environment recognising the importance of biodiversity.
- There is a need to secure and promote increased energy efficiency and renewable energy sources;
- There is a need to promote and secure more sustainable waste management.
- There is a need to consider the impacts of flooding and flood risk;
- The re-use of land should be promoted to minimise the take-up of greenfield land.

Source: Sustainability issues were derived from the baseline data gathered in 2008 – 2009 to inform the SA SD07 Scoping Report, Knowsley council

None of the Knowsley MB goals, above, will be achieved by releasing Green Belt.

“Air pollution is currently estimated to reduce the life expectancy of every person in the UK by an average of 7-8 months. The measures outlined in the strategy could help to reduce the impact on average life expectancy to five months by 2020, and provide a significant step forward in protecting our environment.” DEFRA The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

<p>E9. To use water and mineral resources prudently and efficiently.</p>	<p>Each of the options is unlikely to have any significant effects on the objective.</p>
--	--

Objections:

The objections would be largely in line with those made against E7 as follows:

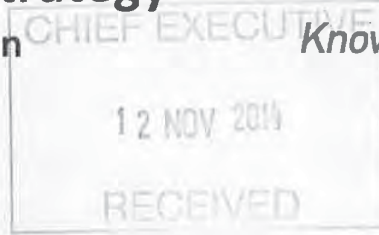
- It is critical that this precious resource is managed properly to ensure that the needs of society, the economy and wildlife can be met and maintained in the long-term.
- Surrounding Big Water Lake with a vast housing estate of over 1500 houses must surely impact on the quality of water in the local area.
- The lake in this area is used for recreation and fished regularly by a local club, it is considered “Good Fishing” one of its advantages is its rural location. We have seen no mitigation of negative effects on water, suggested by Knowsley Council.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

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		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

SAVE WHISTON GREEN BELT

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

KGBS14

Paragraph Ref

EC1

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 COUNCIL'S PHILOSOPHY ABOUT NEW HOUSING CONTRIBUTING TO ECONOMIC DEVELOPMENT AND POPULATION RETENT IS FUNDAMENTALLY FLAWED. SEE FIRST PARAGRAPH IN DOCUMENT KG BILLS A OBJECTIVE EC1 (A) (U) 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. COMPETIVENESS AND PRODUCTIVITY AND BUSINESS AS STATED DOCUMENT KG BILLS A 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

From: Martin Parker [REDACTED]
Sent: 22 October 2014 00:45
To: Knowsley Local Plan
Subject: Proposed Sustainable Urban extensions SUE 2C

Follow Up Flag: Follow up
Flag Status: Flagged

I believe that this extension should not be progressed as there are significantly greater negative effects than the positive effects described. I am starting to examine the evidence library and immediately see that the

Sustainability Appraisal of Knowsley Local Plan: Core Strategy Proposed Modifications – September 2014 is flawed in a number of conclusions in respect of the proposals for the development in South Whiston.

The Environmental impact must be considered in respect of;

E1. To protect, enhance and manage the local character and accessibility of the landscape and countryside across Knowsley.

E2. To protect, enhance and manage biodiversity, the viability of protected and endangered species, habitats, geodiversity and sites of geological importance.

The existing land around the Halsnead estate is already widely used for recreational exercise. The proposed development would be a negative impact. The visual aspect would also be lost for wide areas of existing residences. The remaining vestiges of the Halsnead Estate which define the character of this area would be severely negatively impacted by the proximity of a modern development. The development would make access to natural habitats and complementary agricultural land more remote for the people of Whiston and Huyton.

There appears no evidence that detailed surveys of wildlife habitats has taken place. It is recognised that it would “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”. Without a detailed assessment of how severe this impact may be.

E10. To reduce the need to travel and improve choice and use of more sustainable transport mode.

The conclusion “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”. is flawed. Further development of housing would may lead to incremental increase in walking and cycling but such developments invariably lead to a preponderance of reliance on car transport. The existing road infrastructure is already strained. What analysis has been performed on the traffic congestion at peak times all around the M62/M57 Tarbock traffic island and what are predictions for the likely impact of the increased traffic on congestion, queues and consequent Carbon emissions?

I believe that this should be the least favoured option of all those proposed.

From
Martin Parker, Concerned Knowsley resident

**Proposed Modifications - Consultation
Representations Form**

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Martin Parker	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation Martin Parker

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref M157 Policy Ref SUE2c Paragraph Ref 6.45

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
a) Legally Compliant? (see guidance note 2.2)		
b) Sound? (see guidance note 2.3)		✓

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The proposal involving SUE 2c is unsound as it underestimates the impact of increased traffic flow on the roads around Whiston and the M57/M62 Junction 6 /A5080/ A5300 intersection known as “Tarbock Island”. This complex roundabout has had a history of traffic congestion and accidents.

The existing roads have traffic queues at daily peak times now.

The Knowsley Local Plan Transport feasibility study and Infrastructure and development options study recognised the current congestion and local queueing on Windy Arbor Road and Lickers Lane and the future impact of the proposals to “generate a large number of trips, with the majority most likely being dispersed towards Tarbock Island and Windy Arbor Road”.

The Sustainability assessment . In addition to meeting the generic guidance in Policy SUE 2c states “proposals for residential and/or employment development at South Whiston and Land South of the M62 should deliver (in no order of priority):

- a. Safe and convenient highways access for the sites together with a well connected internal road system and traffic mitigation measures, including any measures needed to address the impact of the development on traffic generation in the wider area;
- b. Provision for public transport, walking and cycling, which enhance linkages within the area and surrounding areas including linkages to the former mineral railway line linking Cronton Colliery and Stadt Moers Park and to Whiston railway station;

The proposal is unsound in that in the Sustainability assessment S2 assumes the provision of “Safe and convenient highways access for the sites together withtraffic mitigation measures”.

The existing population of Whiston South Ward is 7379 in 3157 households – the proposal to build 1900 additional houses for “aspirational” families will lead to an almost doubling of the population in the area and the existing roads will be overwhelmed. “Aspirational families” elsewhere in the borough tend to be 2 car owning (18% of households) and there are issues around schools with cars delivering children where parents then drive to work. In Knowsley 37% of households have no access to car (2011 Census) this influx of 1900 additional households is unsustainable in the local area. The traffic congestion will preclude incoming residents and existing from relying on future “enhanced” public transport.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Delete the words “, and SUE 2c
“Sustainable Urban Extensions - South Whiston and Land to the South of the M62”) and necessarily the links and other references throughout.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) Yes, I wish to participate at any further public hearing

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Signature



Date 12/11/2014



Knowsley 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 M056A Policy Ref CS3 Paragraph Ref 5.18

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
a) Legally Compliant? (see guidance note 2.2)		
b) Sound? (see guidance note 2.3)		✓

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

The proposal to bring forward to “within 5 years” is unsound as it is incorrectly justified. The proposal releases much more land from the Green Belt than is required to meet housing demand and falsely justifies the requirement to bring forward SUEs for early release in the first 5 years.

Examples of this incorrect justification include the evidence used for housing demand in which both the population and forecast population growth are overstated. The 2013 Core Strategy states (in Section 2.10) population to rise by 4000 between 2011 and 2021. The Technical Report “Planning for Housing Growth in Knowsley” forecast a rise of 3000 in the same period. However the document SD 31 (June 2014) forecasts an even lower rise of 1800 over a longer period from 2012 to 2037. MO 24 evidences that the baseline population assumption was incorrect and overstated by 3330.

The premise for the growth in housing demand was therefore unsound and overstated.

Additionally housing demand did not allow for the fact that in the past 3 years a constant level of vacant homes is immediately available averaging 2221 (2169 at 31/10/2014, 2204 at 31/10/2013 and 2289 at 31/10/2012) which should be factored into short term availability.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Delete the amendment and the proposed changes to the green belt

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) Yes, I wish to participate at any further public hearing

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Signature



Date 12/11/2014



Knowsley Council

Knowsley Plan: Strategy

Local Core



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	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.

I believe that the **Sustainability Appraisal of Knowsley Local Plan: Core Strategy Proposed Modifications – September 2014 is**

is unsound and fails to properly examine the impact of SUE2c on the Environment objective E.2

E2. To protect, enhance and manage biodiversity, the viability of protected and endangered species, habitats, geodiversity and sites of geological importance

Although a “desk-top” Habitat Assessment had been reported the evidence suggests that no detailed study of the ecology had taken place locally in recent years. (The Habitat assessment quotes assessment of vegetation by studying photographs). The Phase 1 Habitat Survey for the Land at south Whiston and south of the M62, Cronton was performed over 6 half days in mid October 2013 and acknowledged that further work was required to fully identify the fauna and flora potentially present in the area due to access and more si. No results have been published if this further work has taken place.

This study already identifies that the site contains areas of habitat that are of national ecological value. Release of such a large area of Green Belt does not seek to mitigate the impact on loss of biodiversity and habitats.

No mention is made in the Habitat Assessment on any impact of non-native invasive species on planned development. Ie Japanese Knotweed, Himalayan Balsam etc which are present . There is no evidence of a risk assessment being performed

If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Delete the words “, and SUE 2c
“Sustainable Urban Extensions - South Whiston and Land to the South of the M62”) and necessarily the links and other references throughout.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) Yes, I wish to participate at any further public hearing ✓
- b) No, I do not want to participate at any further public hearing

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Signature



Date 13/11



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	Mr	
Name	Michael Humphreys	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

South of
Whiston

Policy Ref

KGBS14

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

S1 – With regards to this statement I do not see any evidence in the proposed modifications which will bring employment into the region beyond the initial building stage. The building stage does not guarantee that the local building trade will benefit as corporate house building companies have established suppliers and will not necessarily benefit local building trade. If you consider that Knowsley's own website advises that apprentices be paid the statutory minimum wage I don't see this having an impact on the economy to justify the building of a minimum of 1503 houses.

S3 - With no plans to increase police budgets only to decrease based on the national plan for the police. In fact a rapid population growth will increase the cost of services such as police.

S4 – Knowsley shows no sign of being able to communicate the basics of ripping out the greenbelt in its own local area so I have little hope that they will make a contribution to improving community decision making.

S5 – Knowsley has one of the poorest results for emphysema, breast-feeding take up rates, childhood tooth care (I could go on) with no consideration for expanding the local NHS facilities it would either put a massive drain on the existing services or leave the new inhabitants with no facilities to use such as GP's, dentists and childcare. There is no plan in place that shows we will have confidence in our council to adapt and implement the necessary. This news article demonstrates the type of mismanaging that continues today
<http://www.liverpoolecho.co.uk/news/liverpool-news/councillors-anger-18m-unspent-funding-7883509>

3. Continued

E1 – by building on the greenbelt we will no longer have access to the landscape and countryside across Knowsley as the remainder of the Greenbelt is on the Derby Estate which is private property with very little access.

E2 – I simply don't understand how you can justify this statement as you plan to cover it in concrete.

E3 – I can find no record of Knowsley council accessing the flood records through the Environmental Agency held in Warrington which shows upon building Foxshaw close and Windy Arbor Close faced difficulty due to wet soil, flooding and landslides. Though there are no legal requirements to do this surely when making plans to develop an area ground conditions are a priority!

E4 – E11 there is no evidence to suggest this will have a positive effect on the area by removing green land in favour of housing and concrete.

EC1 – The governments own Portas report shows that more and more people are moving away from shopping experiences similar to those found on Greene Lane in Whiston Village. With little investment being put into these areas they are starting to look tired and unkempt.

EC2 - several attempts to revitalise the centre of town in Prescot have failed and we continue to see shops close and left empty. This in no way would attract people to an area leaving this proposed estate with little interest.

EC3 – the proposed occasional shop within the plan does not make a thriving business to employ 3000 people does it? And the proposed warehouse which I assume (like many of the facts in this document) will employ people on or near minimum wage I do not see how they would be able to afford some of this housing.



14/12/21

2/2/21

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

The council has failed to release brownfield sites in a timely manner for development such as the 2 demolished leisure centres in Huyton and Prescott. Further investigation as to why Green belt is now favoured over all brown field should be investigated.

Knowsley Council have failed in their due diligence to inform the local population as to the proposed plans. They themselves have accused Royal Mail of failing to deliver notifications however there has been no pressure or charges brought for tampering with the mail. It has only been a local campaign that has seen the population informed.

The 5 day consultation last year when very few people came shows how poorly informed people were in comparison to all the forms you are receiving now in protest to it. I would recommend a new consultation of the local people.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

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Signature



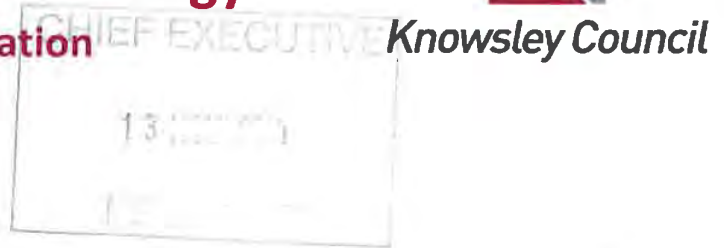
Date

14/11/14



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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	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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Signature



Date 11/12/2014

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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.

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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.

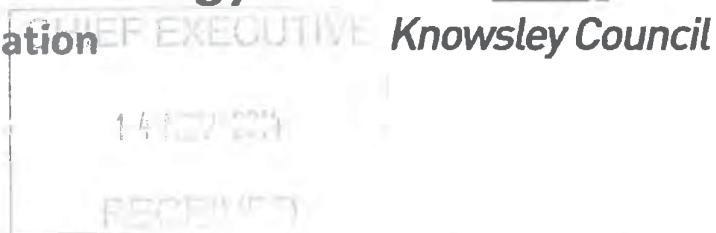
I refer to Strategic Objective 8 (SO8) Green Infrastructure and Rural Areas, which refers to 'support and strengthen the role of Knowsley's Green Infrastructure (in rural and urban areas), promote biodiversity....' This was score a minor negative! The report is flawed! It is noted that 'development of 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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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr S	
Name	Patricia McDonald-Holmes	
Job Title (if appropriate)	Printmaker Artist / Teacher	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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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 HOMES

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS14

Policy Ref

E4

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

It is quite clear that the development of Green Belt in Whiston will have an overall negative effect on the aim to mitigate climate change. The carbon footprint of each dwelling and the scale of development will produce large quantities of carbon monoxide and air pollution. The destruction of plant life and removal of trees will add to the effect of poor air quality. An estimate of 80 tonnes GHG is created for the construction of a brand-new cottage with two bedrooms upstairs and two reception rooms and a kitchen downstairs.

From the KGBS14 document, It is noted that the Knowsley Renewable and Low Carbon Energy Options study (2009) considered that a purely residential development of the area would be unlikely to readily lend itself to a district heating opportunity, meaning more GHG created from individual homes.

In addition, the site is not located within a 'Priority Zone' for renewable and low carbon energy as identified by the Liverpool City Region Renewable Energy Capacity Study (2009) and it is therefore unlikely to deliver a reduction in carbon emissions beyond those required by Local Plan policies, which means that builders need not put into place the high specifications needed in the development to mitigate climate change.

The Sustainable and Low Carbon Development (5.183 SD32. CS22) removal of the developers need to meet the Sustainable homes/BREEAM standards will increase energy usage.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

With the decline in average household occupancy. More and more, people want to live alone or in small family units. In 2004, the average household occupancy was 2.34. By 2026 this is expected to reduce to 2.09 (DCLG, 2007). This issue does cause difficulties when attempting to reduce the carbon footprint of a household. A single person household does use more energy per person than a four person household. Therefore, instead of seeing a decline in energy use by households there is still a small annual increase in the region of 1% per year.

In addition to housing, there are numerous other issues that contribute to the carbon footprint of the average UK household. The construction, maintenance and household energy requirements equate to 25% of total GHG emissions in the UK. (John Barrett^{1,*}) and Thomas Wiedmann²)

Taking into account the paragraphs in E4 relating to mitigating climate change it is evident that Knowsley council itself believe it will not meet targets for the reduction of GHG if this development and destruction of greenbelt land goes ahead.

Continue on a separate sheet if necessary...

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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



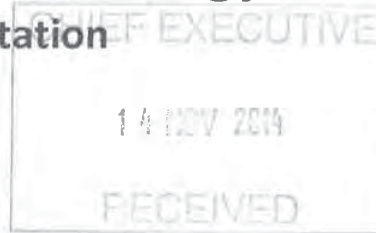
Date

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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	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

4. If you are objecting to the modification please set out how you consider it should be changed to make 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.

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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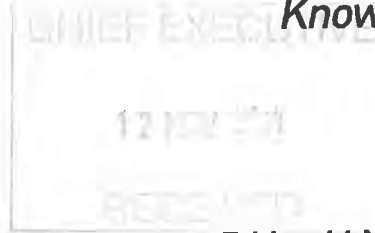
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PART A – PERSONAL DETAILS

	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		

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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)

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| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

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.

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Signature



ate 03/11/2014

KNOWSLEY LOCAL PLAN: CORE STRATEGY

Submission and Objections regarding proposed modifications

Ray Davis
Whiston Green Belt Action Group

Sustainability Appraisal Report SD32

Implications for South Whiston and Prescot Town Centre – Please see my comments highlighted in red.

3.20 The appraisal concluded that the Spatial Strategy for Knowsley is likely to have a largely positive impact on the sustainability objectives. In particular, it is envisaged that the Development Principles (CS2) are likely to have a major positive impact in the long-term on the objectives relating to health; mitigating climate change; and reducing the need to travel. It was concluded that the policies for Housing Supply (CS3), the Economy and Employment (CS4) and Town Centres and Retail (CS6) would have a positive impact on a range of objectives, particularly those that relate to social and economic issues and the appraisal also predicted that the policy for Green Infrastructure (CS8) would have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; adapting to climate change; and green infrastructure.

I would question how removing green belt can have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; and adapting to climate change.

3.21 The appraisal of the Proposed Submission document did however consider that a number of the policies would have an uncertain or negative impact on some of the objectives. For instance, it concluded that a number of the policies, such as the Spatial Strategy (CS1) and Green Belt (CS5) could have an uncertain impact on a number of environmental objectives in the longer term due to the potential for it to result in the release of a number of sites in the Green Belt.

How can this statement hold true to statement at 3.20 one is negative and one positive?

3.23 Nevertheless, the appraisal of the Proposed Submission document acknowledged that as each of the policies would result in built development and would therefore lead to some carbon emissions associated with the construction and operation of this development, their impact on the objective relating to mitigating climate change is uncertain. It also considered that there is some uncertainty over the impact of the policy for Knowsley Industrial and Business Parks (CS11) on the objectives relating to air quality and need to travel, particularly as there is limited information available on the amount and nature of the new employment uses that would be delivered. In addition, due to

both policies resulting in the provision of B1 office development in an out of centre location, the impact of the policies for Knowsley Industrial and Business Parks (CS11) and South Prescott (CS13) on the objective relating to the vitality and viability of Knowsley's town centres was also deemed to be uncertain.

The actions contained within the Local plan are identified here as uncertain and would certainly fail in meeting our green credentials as the development of green belt out of centre would increase the carbon impact.

3.24 On the whole, the appraisal of the Proposed Submission document concluded that the Thematic Policies performed well in the SA process. In particular, the policies relating to housing and the accommodation needs of the community (CS 15 – CS18) were considered to all have a positive impact on the objectives relating to poverty and deprivation; health and the provision of good quality housing; the policies relating to Sustainable and Low Carbon development (CS22) and Renewable and Low Carbon Infrastructure (CS23) were considered to have a major positive impact on the objective relating to mitigating climate change; and the policy for Greenspaces and Trees (CS21) was considered to have a major positive impact on the objectives relating to landscapes; biodiversity; adapting to climate change; and green infrastructure.

How can this point be made as positive when the document already highlights the possibility of a negative impact on all of the CS range of reports?

Proposed Modifications to the Submission Local Plan

3.26 The initial Local Plan Examination hearing sessions took place in November 2013. Following these hearing sessions, the Inspector appointed to undertake the examination issued his interim findings in January 2014. In response to these findings, and also to reflect other required amendments, the Council proposed a number of modifications to the Plan. These modifications included a revised approach to the release of Sustainable Urban Extensions, a reduction in the employment land target for the plan period, a reduced target level of affordable housing provision on sites in the urban area and the prioritisation of different forms of developer contributions in instances where viability is insufficient to fund all the non-mandatory requirements set out in the Plan.

The reduced level of affordable housing can only be in the favour of developers, government guidelines call for a level of 25%. A reduced level of employment land means that the target of job creation must be flawed.

4.10 The scale of any impact on an objective has been predicted taking into account the size of the site and the quantum of development it is likely to accommodate. In relation to housing sites, where an approximate number of dwellings that could be accommodated on a site have not been provided by the promoter of the site, its yield has been estimated based on the standard multipliers used for assessing the capacity of sites within the Strategic Housing Land Availability Assessment

(SHLAA) and the Green Belt Study. For sites in excess of 2 hectares in site size, this assumed a 75% net developable area and a density of 30 dwellings per hectare¹³.

In the case of South Whiston, 75% of the proposed area of 110.3 hectares minus 27.6 = 82.70 hectares @ 30 dwelling per hectare is 2481 dwellings. The council have only declared 1503 dwellings. This calls all of the council's estimates of housing into question. The proposal to bring forward Green Belt release on such a scale will also produce many more houses than the SHLAA calls for. Also the government has in October 2014 told councils to use the NPPF to protect Green Belt.

“Councils must protect our precious green belt land”

From: Department for Communities and Local Government, Brandon Lewis MP and The Rt Hon Eric Pickles MP

First published: 4 October 2014 # Last updated: 6 October 2014

Part of: Improving the energy efficiency of buildings and using planning to protect the environment, Climate change, Environment and Planning and building

SUE 2c – Sustainable Urban Extension: South of Whiston and Land South of M62

5.44 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the further modifications to the policy would remove the specific reference to housing in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require the development to provide a wider choice of housing in the area. Consequently, given the substantial capacity of the site, it is considered that the policy has the potential to have a positive impact on the objective of providing good quality housing and this impact would become increasingly significant as the development is built out. The policy also promotes a significant amount of employment development in this location and, due to the scale of development that would be delivered, could also encourage further investment in the area, generate employment and training opportunities in the construction sector and help sustain existing local facilities. As such, the policy could also have a major positive impact on the objectives that relate to business growth and productivity; and reducing unemployment; and some positive effect on the objectives concerned with poverty and deprivation; and education and skills.

Any employment gains in the building industry are short term and will have little impact on local unemployment. With the reduction in affordable housing previously mentioned (3.26) how can the massive scale of over 2400 houses have a beneficial effect, without considerable investment in infrastructure. There are only two local primary schools, I question if they would have the capacity to cope with this massive

development. Already in (3.21 & 3.22) the question of environmental and green space negative impacts have been mentioned, a development on this scale would surely cause a negative impact on all those areas mentioned.

5.45 The policy would also result in residential development being directed to a location that is within reasonably close proximity of established employment areas and a number of local facilities, including primary schools, a GP and health centre and a local shopping centre on Greenes Road. It also requires new development in this location to contribute towards public transport provision and improve links to Whiston railway station. As such, the policy could have a positive impact on the objectives that relate to improving access to services and amenities; and the use of more sustainable transport modes.

Local transport in Whiston is very poor and anyone who is not a car owner and lives on Windy Arbor Road, has already seen a reduction in buses available since de-regulation. To suggest building a large number of houses will increase local transport is naïve in the least and downright misleading. The development by Halton in Cronton has not seen a vast increase in bus traffic and hardly a bus is available late at night. The local shopping centre mentioned is log jammed at busy times with cars and deliveries by Artics to Tesco and the odd truck using Whiston as a short cut from Tarbock island. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.46 Given the scale of development promoted, the policy has the potential to generate a significant amount of additional expenditure which could support nearby local centres. As such, the policy has the potential to have a positive impact on the objective that relates to the vitality and viability of town and local centres. In addition, a key element of the proposals for the site is the creation of a country park with associated footpaths, cycleways and bridleways, and the policy also requires development in this location to encourage walking and cycling and provide public open space. As such, it is considered that the policy could support participation in sport and recreation and could therefore have a positive impact on the objective that relates to health.

Why it is necessary for so much land to be considered for removal from the Green Belt, to the south of the M62. Only about a third of this is reported to be for development. It has been said that the rest will form a Country Park, on the Old Cronton Colliery site. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.47 The policy would however have the potential to have a negative impact on a number of objectives. In particular, it directs development to a greenfield site that contains large areas of Grade 2 Best and Most Versatile agricultural land. As such, the policy would have a major negative impact on the objective that relates to protecting land and soil. Directing development to this location would also have a negative impact on the objective that relates to protecting landscape character;

and could have a negative impact on the objective that relates to biodiversity by resulting in the loss of priority habitat and/or by placing pressure on nearby Local Wildlife Sites. Nevertheless, there is only a low level of certainty about the impact of the policy on this objective.

There is a clear admission here of the negative impact of taking this area out of Green Belt. With the increase in Global commodity prices locally produced food is more important. The need to remove Grade 2 Best and Most Versatile agricultural land from the Green Belt is not proven and 5.47 highlights the negative impact of this policy.

5.48 The policy will result in development taking place in a location that is within reasonably close proximity to local facilities and would also require the development to contribute towards public transport, walking and cycling. However, the construction and operation of this development would inevitably result in carbon emissions and would inevitably generate a significant number of vehicular trips and associated emissions. Consequently, the policy has the potential to have some negative impact on the objectives that relate to mitigating climate change; and protecting air quality.

There is a clear admission within (5.48) that the development proposed is identified as having a negative effect on carbon emissions and would certainly fail in meeting our green responsibilities. The mention of a significant number of vehicular trips bears out our belief that there would be a serious impact on traffic congestion within Whiston.

5.49 The policy would also have an uncertain impact on some of the sustainability objectives. Specifically, the policy would result in development being directed to a location that is in close proximity to a number of heritage assets. Nevertheless, due to the scale of the site, there may be scope to incorporate an adequate buffer around these assets to protect their setting. In addition, the policy requires development in this location to comply with Policy SUE 2 which, amongst other things, requires new development to protect and enhance historic and architectural assets. As such, it is uncertain whether the policy would have a significant impact on the objective that relates to preserving and enhancing Knowsley's built heritage.

These comments can only reinforce the need for a structured approach to any release of Green Belt and more time should be spent understanding all the issues before we take a decision that cannot be revoked.

5.50 Although the policy directs development to a greenfield site which has the potential to function as part of the Borough's Green Infrastructure network, it also involves the creation of a country park and the requirement for development in this location to be subject to a master planning should ensure the appropriate retention and provision of objective that relates to providing and conserving green infrastructure is also considered to be uncertain. Areas of

Green Infrastructure. As such, the impact of the policy on the objective that relates to providing and conserving green infrastructure is also considered to be uncertain.

(5.50) Again mentions uncertainty in the council decisions and in my view at least suggests they don't know what will happen when developers have free reign to build on our Green Belt. If a large area of this site is going to become a Country Park, then why is it necessary for it to be removed from the Green Belt? There is no mention of the timescale for implementation of the country park, and if funding for it is in place.

5.51 Similarly, although the policy would result in development taking place in the vicinity of a number of water bodies, there is limited certainty over whether this would impact on the water quality of these waterbodies. Consequently, it is considered that the policy would also have an uncertain impact on the objective of protecting, improving and where necessary, restoring the quality of inland, and estuarine waters.

We have yet to see a definitive study of water quality after development, and we suggest the loss of some 110 hectares of open countryside will seriously impact local wildlife

KGBS 14 - South of Whiston

5.82 Policy SUE1 identifies South of Whiston as a SUE primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development including the Local Wildlife Site but excluding Public Open Space. This option would not introduce any phasing restrictions but would include a policy requirement for ancillary facilities (e.g. Retail and Public Open Space). The second option considered was to allocate the site for housing development with site-specific allocations for retail and Public Open Space provision but no phasing restrictions. The third option was to allocate the entire site for housing development with no phasing restrictions.

We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision.

5.83 The appraisal concluded that each of these would have a similar impact on a number of the sustainability objectives. In particular, given the substantial capacity of the site, it concluded that each option could have a major positive impact on the objective of providing good quality housing and that this impact would become increasingly significant as the development is built out. However, by introducing a potentially inflexible approach to the provision of open space and retail, the appraisal recognised that Options 2 could have an adverse impact on the deliverability of the site which reduces the level of certainty that the option would have a major positive impact on the objective. Due to the size of the area and the quantum of development it could accommodate, each of the options could also generate a number of employment and training opportunities in the construction sector and

could stimulate further investment in the area. As such, the appraisal noted that each of the options has the potential to have a positive impact on the objectives that relate to reducing deprivation; skills and training; business competitiveness; and unemployment.

Once again there is too much that is hopeful and of little certainty and i would re-iterate my previous comment. We have yet to understand how the council can arrive at the option decision, especially as this has not been discussed with local residents. Perhaps if local residents understood the detail better they could make an informed decision. This decision is at odds with local Public opinion and also at odds with the localism bill.

5.84 The appraisal considered that each of the options would also result in development taking place in close proximity to a range of local facilities and amenities including primary schools, a GP and health centre and a local centre on Greene's Road and development in this location could make a contribution to the continued viability of these services and facilities. Options 1 and 2 would also support the provision of certain facilities/amenities within the site. As such, each of the options could have a positive impact on the objective that relates to access to services and amenities but there is a higher level of certainty that Options 1 and 2 would have a positive impact on this objective due to these options resulting in the provision of facilities on-site. Given the significant capacity of the site, each of the options also has the potential to have a positive impact on Knowsley's town centres and the local centre on Greene's Road by increasing levels of expenditure in these centres. As such, each option could have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town centres

The retail centres mentioned at Greenes Road is a small satellite and little could be done to expand it. Increasing the footfall would inevitably increase traffic in what is already a very congested area. An increase in local population will only put more pressure on what is an already stretched NHS provision.

5.85 The appraisal did however recognise that each of the options could impact upon the setting and significance of a number of heritage assets and have a negative impact on the objective that relates to Knowsley's built heritage. These assets are however located towards the edges of what is a large site and there may be scope to incorporate an adequate buffer around these assets to protect their setting. Consequently, there is only a limited level of certainty that each option would have a negative impact on this objective. By resulting in the loss of a significant area of greenfield land and by potentially placing pressure on areas of ecological value, each option could also have a negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the

objective that relates to air quality. There is however a lower level of certainty that Options 1 and 2 would have a negative impact on this objective as both of these options would support the provision of some facilities on the site which could reduce the need to travel and associated vehicle emissions. Each option could also have a major negative impact on the objective of adapting to climate change; a negative impact on the objective of mitigating climate change; and an uncertain impact on the objective that relates to protecting water quality.

Once again the councils own comments highlight the negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the objective that relates to air quality, and also increase congestion.

5.86 Each option would result in the loss of a substantial area of greenspace, sections of which are used for informal recreation, and could therefore reduce opportunities for participation in informal sport and recreation and thereby have a negative impact on the objective that relates to health. Nevertheless, Options 1 and 2 would provide support for the retention/provision of areas public open space and could therefore have a positive impact on the objective. Conversely, Option 3 would not support the retention/provision of areas public open space and would therefore have a negative impact on the objective. Options 1 and 2 would also result in the provision of some facilities on the site which could help reduce the need to travel and have a positive impact on the objective that relates to reducing the need to travel and improving the use of more sustainable transport modes. By contrast, as Option 3 would not directly support the provision of on-site facilities, this option has the potential to have a negative impact on this objective.

Once again the councils own comments highlight the negative impact on outdoor activities and recreation for local people.

CS5 - Green Belt

5.133 The revised policy would have a largely similar impact on the sustainability objectives to the version of the policy included in the Core Strategy Submission document.

The use of Green Belt for building is overwhelmingly opposed by the majority of residents. The reason used by the council for use and early release of Green Belt does not meet the NPPF in regard of the 5 purposes of Green belt and Extraordinary needs do not exist, to remove Best and Most Versatile agricultural land. It is also at odds with latest government thinking. See 4.10

5.134 The policy would continue to protect the majority of Green Belt from inappropriate development but, as with the previous version of the policy, would support the identification of a series of sites for release from the Green Belt to ensure that there is sufficient housing and employment land to meet the needs of the Borough. However, the proposed modifications to the policy would mean that the release of these Sustainable Urban Extensions (SUEs) is no longer controlled by a phasing mechanism and the modifications would also result in these sites being allocated for development rather than just identified as broad locations. These modifications mean that the SUEs would now be more likely to come forward earlier in the plan period. As a result, many of the impacts that would have occurred in the longer term under the version of the policy included in the Core Strategy Submission document would now occur earlier in the plan period under the revised policy.

The rapid release of Green Belt land can only be to the benefit of developers and will put back development of brown field sites. The council admitted at the hearing that early release of Green Belt will result in the delay of development of brown fields, and this too is highlighted by latest government thinking, see 4.10. The proposal to release Green Belt early is a poor decision not made in the best interests of local people. We will quickly see what a poor decision it was.

5.135 By continuing to support the identification of SUEs and safeguarded land for housing and employment development the amended policy would continue to ensure that there is sufficient land to meet the Borough's development requirements. It is therefore envisaged that the revised policy would still have a positive effect on the objectives relating to poverty and deprivation; housing; the growth potential of business sectors; and maintaining high and stable levels of employment. However, as noted above, these impacts are now predicted to occur earlier in the plan period. In addition, by potentially resulting in the SUEs coming forward earlier in the plan period, the modifications to the policy could result in the SUEs competing with the Council's regeneration objectives for urban areas. As a result, the modifications to the policy reduce the level of certainty that it would have a positive impact on the objective that relates to poverty and deprivation.

The proposal to release Green Belt early will impact on the council stated regeneration objectives. Little in the way of long term employment will come from vast housing estates, only a greater demand on roads, schools, GP's and a lowering of air & water quality with an increase in noise pollution.

5.136 In addition, as the amended policy would result in some housing and employment development taking place in areas on a series of predominantly greenfield sites that are presently within the Green Belt, it could have a negative effect on the objective relating to land and soil and an uncertain effect on the objectives relating to landscape character and accessibility; and Green Infrastructure. Key mitigation measures to address some of these impacts will include ensuring new

development is built to an appropriate density, retaining areas of woodland, securing the provision of on-site open space, and securing appropriate landscaping to moderate the impact of proposals on the local landscape character.

I have already called into dispute the density quoted by the council as the proposal in South Whiston and the Council average density of 30 dwellings per hectare is significantly above the information they have given the public and what they have consulted on. Consultation is 1503 against 2481 according to calculation using average density(4.10). Latest planning applications are far in excess of what the public were told, Recently Knowsley gave outline planning permission for 207 dwellings at Bank Lane, Kirkby (even though the site is still in the Green Belt). This is a difference of 76 dwellings, and represents a 58% increase on the capacity that Knowsley Council said the site had.

5.137 As some of the SUEs are used for informal recreation and others contain sports pitches, it is considered that the revised policy could also still have a long term negative impact on health. The proximity of some of the locations to designated heritage assets and the presence of archaeological assets within some of locations mean that the revised policy would also still have an uncertain impact on the objective relating to built heritage in the longer term. It is also considered that the policy still has the potential to have a negative impact on the objective relating to biodiversity. Undertaking ecological surveys, excluding areas of priority habitat from the developable area and the provision of on-site habitats are all likely to be key mitigation measures. However, as noted above, these impacts are now predicted to occur earlier in the plan period.

Uncertain impact on archaeological assets within the area will be compromised. We have not seen Ecological research to discredit the assertion that removing this area from Green Belt will not have a catastrophic effect. The modifications will bring the ecological disaster forward, so that we may see them before our Grandchildren do.

5.138 The revised policy still would have the potential to result in more dispersed patterns of development. In addition, the construction and operation of the development that would be delivered on the SUEs would inevitably result in carbon dioxide emissions. Consequently, and notwithstanding the fact that the Knowsley Local Plan Transport Feasibility Assessment (2012) identified that some of these locations have good accessibility to bus routes, cycle routes and services and facilities, it is considered that the revised policy would still have an uncertain effect on the objectives relating to mitigating climate change; protecting air quality; and minimising the need to travel.

This point is broadly supporting our ascertainment as to the detrimental impact on traffic within the area. Local People contest the accuracy of the Knowsley Local Plan Transport Feasibility Assessment (2012) as our research carried out by local people show more than 400 vehicles per 30 minute session at peak times and if deliveries took place to Tesco with Artic then the whole area became log jammed. Only one bus per

hour was spotted until 7pm when the service stopped. We would assert that the transport assessment is out of date and not relevant to the increase in traffic we have seen and would call for another assessment to be carried out.

CS14: Principal Regeneration Area – Prescot Town Centre

5.156 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process. The revised policy would still direct investment to Prescot town centre and would seek to intensify its retail function, encourage a wider mix of uses and create a distinctive identity and a complimentary evening economy. As such, the revised policy would still have the potential to have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town and local centres. The amended policy wording does however remove some of the restrictions placed on retail development in Cables Retail Park. In particular, it is no longer specified that retail development within Cables Retail Park should provide for convenience or bulky goods retailing and should maintain the current retail floorspace capacity of the Retail Park. These amendments could increase the scope for further investment in the Retail Park and result in a consequential reduction in investment in Prescot town centre, particularly as the Knowsley Local Plan Economic Viability Assessment (2012) indicates that comparison retail in Prescot town centre is generally unviable in current market conditions. This reduces the level of certainty that the revised policy would have a positive effect on the objective.

Prescot town centre is run down and irrelevant in retail terms, even the council have had to move offices to an ex pub at vast expense, just to fill another empty building. When the council allowed Tesco to build a massive supermarket at Cables Retail park it is as good as sounded the death knell of Prescot town centre. (5.156) Broadly agrees with our assessment.

5.157 By reducing the level of certainty that the policy would support investment in Prescot town centre, these proposed amendments mean that there is also a lower level of certainty that the revised policy would have a major positive impact on the objective that relates to protecting and enhancing Knowsley's built heritage.

Not proved

5.159 There are no anticipated negative effects on the sustainability objectives. The proposed modifications would not however prevent the policy from having an uncertain impact on the objective relating to mitigating climate change

Not proved. Agrees with earlier points that state the policy 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 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 21st century, particularly as we all face the prospect of climate change. The demand on energy, water and other resources is likely to be much higher.

5.184 In addition, the removal of the requirement to achieve certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.

Once again this point is totally at odds with other statements and shows that there would be a negative effect on the objectives that relates to poverty and deprivation; and health.



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation Representations Form

Knowsley Council



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	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.*

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.

The council's philosophy about new housing correlating to economic development and population erosion is fundamentally flawed. See first para in document KGBS14 SA objected ECI (above) outlining 'none of the options for land to the south of which include an employment element. May encourage further investment in the area sustaining local employment and also potentially bringing new jobs into the area is not a "sound" reason for economic development and productivity of business as stated in document KGBS14 SA objective ECI

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Use the latest figures from the office of national statistics to carry out an up to date housing requirement.
Traffic Management surveys taking into account the existing peak time traffic and extra traffic of at least 2500 vehicles.
Develop empty properties and brownfield sites first.
Put green belt release back until last and consider all other options first
Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) No, I do not want to participate at any further public hearing
- b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature 

Date 1st / 11 / 14

SUSTAINABILITY APPRAISAL 021 ID:551

From: Tina Cinnamond [REDACTED]
Sent: 13 November 2014 23:22
To: [REDACTED]
Subject: Objections to proposed plans KGBS 14 South of Whiston

Follow Up Flag: Follow up
Flag Status: Flagged

Mrs Tina Cinnamond
[REDACTED]

I am objecting to the proposed building of houses on the Whiston Greenbelt Land based on the following reasons.

Firstly, I would like to state that I do not think that I was properly notified of any consultations or public meetings about any of this proposal until it was brought to my attention by reading about it on social media. Knowsley council have stated that they leafletted within 200 metres of the proposed site. However, some people in these areas have not been informed at all.

It has been due to local volunteers posting leaflets and forming a committee that people have become aware of the proposals and as a result of this I do not feel that we have had the proper consultation period and the time to be able to ensure that everyone can state their views.

S1 and S7 The comments say that jobs will be created in the construction industry in this area if this plan goes ahead - how do we know without any kind of detailed plans that the work in the construction sector is going to be done by local construction contractors and not by outside Construction firms. we have not been told anymore about this. Also S7 states that training opportunities could be generated for locals however, there is limited certainty to this until detailed proposals are developed. These two comments contradict each other, how can you create jobs in the area without training when you dont even have detailed plans yet.

S2 Whiston is a small village, with an extra 1500 houses it is going to become a town. How can Whiston facilitate another added population of at least 3000 more people. Our schools do not have much more space, our GP surgeries are already under immense pressure with appointment times and waiting times not ideal at the moment without the added increase of population. Whiston hospital average A and E waiting times are 4 or more hours now. How can any building of houses improve this amenities. It will only increase the pressure that is already being put on our education and NHS services at present.

I am a governor at a local school and I cannot see the major benefits to our school. We are not full to capacity but will not be able to cope with many more children before the school becomes full to capacity. When all of the local primary schools are full people will send children out of the borough to schools or it will become more competitive to be admitted into a school. This is all going to increase pressure on our already overstretched education system.

We have repeatedly been told that Knowsley Council have consulted schools, GP surgeries and the NHS hospitals. However, we have not seen any proof of this.

S4 How can Knowsley Council ensure Community Involvement in decision making when we have had very little say in this major decision. As stated above, if it was left to Knowsley council only very few residents would have been aware of this proposed development. Is this not a blatant contradiction to what they are telling us.

S8 At meetings I have attended all of the ancient woodland, lakes are included on the proposed plans. However, we only have hearsay that these are staying, how can this be certain without a detailed plan. If these are left then local people will not be allowed access as freely as they do now. Surely these should be protected.

E1-E11 Knowsley have clearly overestimated housing need for the next 5 years. They state that population will increase and this is why the need for houses to be built. However, figures show that Knowsleys population has been decreasing for the last 50 Years. Why are the figures so much out?

Government guidelines dated 6th October 2014 state that Greenbelt Land should only be used in exceptional circumstances. If population has declined what is the exceptional circumstance for housing to be built on this greenbelt. We have plenty of Brownfield sites within Knowsley that could be used for building houses on instead of being an eyesore.

Our Greenbelt includes agricultural land, ancient woodland, lakes, wildlife and lots of open space. It is a place to walk and de-stress which a clear way to tackle health and wellbeing issues and obesity. It is a place for children to learn about nature and wildlife with first hand experience of this within the natural habitats.

The heavy machinery and building works is going to have a negative effect on our birds, bats and other wildlife. Wildlife has been undisturbed on this land for many years and creatures and animals such as foxes and various birds and hedgehogs are seen in this area. One of the roads is Foxes Bank Lane and we have a big wooden sculpture at the cemetery. All of these animals habitats are going to be destroyed if not by the actual building work by the noise and pollution in the area. These creatures have took many years to build homes and produce offspring which will now be destroyed. Wildlife and animal activity may not return back to these places for many years to come. This is going to have a detrimental effect to our environment.

Traffic on Tarbock island presently is outrageous without the added increase of extra traffic. Peak times see the roundabout totally jampacked with traffic at present. The extra traffic is going to make this area dangerous, will increase pollution and destroy what little green environment and wildlife we may have safety, health problems for people with respiratory conditions and increasing vehicles on our roads is going to increase road traffic collisions.

Me and my family moved into the area 15 years ago because of the greenbelt land for the use of our future children/Grandchildren etc. When we moved into the area we moved into a new build house. For the first 2 years we did not have a bird in our garden, we didnt see any signs of wildlife or anything.

Please could you take all of my objections into account please.

I would like to participate in any further hearings should we have them.

Mrs Tina Cinnamon

[REDACTED]

From: Tina Cinnamond [REDACTED]
Sent: 13 November 2014 23:29
To: [REDACTED]
Subject: KGBS14 - Land South Of Whiston - Policy References SUE1 SUE2C

Follow Up Flag: Follow up
Flag Status: Flagged

Friends Of Halsnead Allotment Group

[REDACTED]

[REDACTED]

Firstly, I would like to state that we do not think that we were properly notified of any consultations or public meetings about any of this proposal until it was brought to our attention by reading about it on social media. Knowsley council have stated that they leafletted within 200 metres of the proposed site. However, some people in these areas have not been informed at all.

It has been due to local volunteers posting leaflets and forming a committee that people have become aware of the proposals and as a result of this we do not feel that we have had the proper consultation period and the time to be able to ensure that everyone can state their views.

E1-E11 Knowsley have clearly overestimated housing need for the next 5 years. They state that population will increase and this is why the need for houses to be built. However, figures show that Knowsley's population has been decreasing for the last 50 years. Why are the figures so much out?

Government guidelines dated 6th October 2014 state that Greenbelt Land should only be used in exceptional circumstances. If population has declined what is the exceptional circumstance for housing to be built on this greenbelt. We have plenty of Brownfield sites within Knowsley that could be used for building houses on instead of being an eyesore.

Our Greenbelt includes agricultural land, ancient woodland, lakes, wildlife and lots of open space. It is a place to walk and de-stress which is a clear way to tackle health and wellbeing issues and obesity. It is a place for children to learn about nature and wildlife with first hand experience of this within the natural habitats.

The heavy machinery and building works is going to have a negative effect on our birds, bats and other wildlife. Wildlife has been undisturbed on this land for many years and creatures and animals such as foxes and various birds and hedgehogs are seen in this area. One of the roads is Foxes Bank Lane and we have a big wooden sculpture at the cemetery. All of these animals' habitats are going to be destroyed if not by the actual building work by the noise and pollution in the area. These creatures have taken many years to build homes and produce offspring which will now be destroyed. Wildlife and animal activity may not return back to these places for many years to come. This is going to have a detrimental effect to our environment.

At our allotments we teach children how to protect the environment and do work on recycling and conservation issues. We are teaching children to do this and now we are having our greenbelt removed. The children will learn skills but not have anywhere to use these skills firsthand.

Friends of Halsnead Allotment Group

38 HABITATS REGULATIONS ASSESSMENT

Representations Relating to the Local Plan Core Strategy Habitats Regulations Assessment

Reference	Copies Submitted	Submitted By:	
		Representor ID	Name
HRA 001	1	341	Julie Anne Parker (2)
HRA 002	1	11	Kate Wheeler, Natural England
HRA 003	1	412	Martin Parker (3)
HRA 004	1	499	Robin Lomax
Total	4		



Knowsley Plan: Strategy

Local Core



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	Miss	
Name	Julie Anne Parker	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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 J A 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.

Mr Pike,

I believe that the Sustainability Appraisal of Knowsley Local Plan: Core Strategy Proposed Modifications – September 2014 is unsound and fails to properly examine the impact of SUE2c on the Environment objectives E.2

I believe that this proposal is not sound as it does not take into account a number of national studies and best practice from national bodies relative to retaining urban greenbelt land and conservation of priority habitats. It does not take into consideration that the loss of greenbelt in this area, the 6th most deprived borough in the UK, will have on the surrounding community within Whiston. I believe that the release of this land to housing will have a detrimental impact on the local wildlife, well-being, air quality and impact of climate change which will resonate throughout surrounding communities. I would also request that you consider it not to be 'sound' to conduct a habitat survey in October when many species are dormant or in hibernation. In addition to this I ask you to consider the soundness of a 'desktop' habitat survey is adequate to accurately determine the significance of any adverse effects on habitats, conservation and bio diversity of this greenbelt land.

Please take into account the following references from specialist organisations and academics;
The proposed 'A Nature and Wellbeing Act' has been proposed by RSPB and The Wildlife Trust in a direct response to the following;
The State of Nature Report concluded that

- a) We have quantitative assessments of the population or distribution trends of 3,148 species. Of these, 60% of species have declined over the last 50 years and 31% have declined strongly
- b) Contact with nature has many proven physical and mental benefits.
- c) Since more than 80% of the UK's population live in urban areas, it is essential that people living there are provided with sufficient opportunities to experience nature –it may be the only chance they get.
- d) It is clear that people need nature, but the reverse is also true – we need to inspire the next generation of conservationists to tackle the ongoing problems faced by wildlife. The only way to do this is to help people experience, explore and understand the natural world, because people won't protect what they don't know and love.
- e) Of 1,064 farmland species for which we have trends, 60% have decreased and 34% have decreased strongly
- f) One estimate suggests that access to quality green space would save the NHS £2.1 billion pounds annually, because of the health benefits it provides.
- g) The state of the UK's butterflies (2011) concluded that 72% of species had decreased over the previous ten years, including common "garden" butterflies that had declined by 24% at Knowsley Metropolitan Borough Council's Green Space Strategy Conference in 2014,(Elsewhere Professor John Emeritus Bird of Manchester University advised that the greenbelt running adjacent to M62 motorway acts as a 'gateway' for butterflies and other invertebrates and this corridor of travel into other neighbouring boroughs is imperative for the breeding and conservation of such species).
- h) The state of the UK's birds (2012) reported that the UK has lost in the region of 44 million breeding birds since the late 1960s.
- i) The decline of these important nectar and pollen sources has had a knock-on effect for insect pollinators. Of the 97 food plants that we know bumblebees prefer, 76% have declined over the past 80 years¹⁸. As bumblebees are pollinators of some commercial crops and many wildflowers, threats to their populations may have far-reaching consequences for farming, people and other wildlife(Mr Pike if you can again note that Knowsley has 2 predominant 'attractions of interest' 1i)Knowsley Safari Park and ii)The National Wildflower Centre-loss of Knowsley bee population and natural wildflower conflicts with the aims and objectives of Landlife(a wildflower conservation charity) whom established 'the national wildflower centre' in 1999. Indeed there strapline is "Landlife works for a better environment by creating new opportunities for wildflowers and wildlife and encouraging people to enjoy them" Indeed as mentioned on the home page of the national wildflower centres website which is located just 3 miles from the green belt south of the Whiston "We are working in close partnership with Knowsley Council 'The Wildflower Borough', making new landscapes for communities. Releasing land that has an abundance of natural wildflower conflicts the mission statement of Knowsley's premier attraction, source of tourism and contribution to local economy, I would suggest that Knowsley Council and Landlife should do everything possible to showcase Knowsley as the green and flourishing 'wildflower borough' and by releasing greenbelt adjacent to the main thoroughfare in and out of Knowsley (The M62) does not reflect the outstanding work delivered by both Landlife and other environmental conservation charities operating in Knowsley who's key aims and objectives (as per the charity commission website' are to enhance and protect and conserve the natural environment'
- j) In this context ; In the South Whiston and Land South of M62 Habitats survey it is reported "Grey Partridge (*Perdix perdix*) is present and that the UK population of Grey Partridge declined by 88% between 1970 and 2005 and though still widespread shows distinct variation according to agricultural practices. In North Merseyside there were an estimated 300 pairs in 1997-99 and they are present in all suitable habitat. Loss of suitable habitat is the main cause of decline in this species, with changes in agricultural

practices being particularly detrimental. This proposal will exacerbate the decline of this species.

k) Urban wildlife plays a crucial role in enriching people's lives: without it, many people would have no access to nature and all the benefits it brings, by contrast Stadt Moers Park(on the site of a former landfill disposal site) is in dire need of improvements, currently the park is underused with the majority of the local community preferring to use greenbelt for recreational and leisure use. The park path ways are congested with dog excrement, debris from 'burned out' vehicles, graffiti, overflowing or full bins. Attempts to create a more appealing 'nature reserve' for the community have failed, as to as attempts to increase footfall into the park for recreational use for e.g. despite a robust promotional campaign, British Cycling Associations 'Skyride' community bike ride held on Sunday 24th August 2014 attracted just 1 participant from a neighbouring borough. The greenbelt in Whiston is widely regarded as 'the hub' of the community. Knowsley Council reference on a number of occasions throughout the core strategy their objective is to 'create resilient communities' Mr Pike I ask you to acknowledge that a resilient community already exists in Whiston, where neighbourhood values and a small 'rural community feel' are common place, despite being located in an area of multiple deprivation Whiston residents know each other by name – I moved to this area less than 1a year ago and having worked professionally within Knowsley for a number of years I can assure you that no other township in Knowsley has embedded community values as displayed in Whiston.

l) The UK's increasing human population means more pressure on urban green spaces, and less room for wildlife. Of the 658 urban species for which we have data, 59% have declined and 35% have declined strongly. Invertebrates are doing particularly poorly in urban environments with 42% (183) showing strong declines.

m) Half of the species assessed have shown strong changes in abundance or distribution, indicating that recent environmental changes are having a dramatic impact on the nature of the UK's land. There is also evidence to suggest that species with specific habitat requirements (such as those found in ancient woodlands, wet woodlands and wetlands)are faring worse than generalist species that are better able to adapt to a changing environment

In respect of E8

n) Climate change is having an increasing impact on nature in the UK. Rising average temperatures are known to be driving range expansion in some species, but evidence for harmful impacts is also mounting. We should act to save nature both for its intrinsic value and for the benefits it brings to us that are essential to our well-being and prosperity. Mr Pike can you also consider that South Whiston is 'sandwiched' between 2 major motorway networks M62/M57 the latter merging into a 3rd highway 'The Knowsley Expressway'(A5300) This extract is taken from Knowsley Council's Local Pinch Point Fund Application Form to DoT for expansion and junction improvements of A5300. As the number of new homes in Knowsley increases by 3,000 over the next five years and money is invested in development sites and job creation, improved traffic flow will be critical in assisting much needed regeneration and growth. Going forward, based on all trip purposes, the Liverpool City Region Transport model (LCRTM) projects a 3% increase in trips to and from Knowsley to the rest of the LCRTM study area by 2024. This represents around 12,000 additional trips, per weekday, in each direction. The LCRTM taking into account housing and employment growth in Knowsley (not Liverpool or Halton) and including improvements to the A5300/A562 junction, projects that by 2024 the A5300, A562 and A561 will all exceed a volume over capacity ratio of 85% during the AM and PM peaks. 16384 tonnes of CO₂ being emitted per year from A5300 in its current position pre expansion and pre opening of the Mersey gateway and the additional traffic flow associated with this. It concerns me that such increase in volume of traffic, particularly freight traffic will only increase poor air quality produced by traffic and traffic congestion which will exacerbate respiratory disease in Knowsley.

o) Knowsley Public Health Annual Report 2014 states that there were 402 deaths due to lung cancer in Knowsley between 2010 and 2012, 31% of all cancer deaths. Of these deaths, 198 were people under the age of 75.

The rate for premature lung cancer mortality during 2010-12 was 41.1 deaths per 100,000 population, significantly higher than the rate across the whole of England (24.7) and the North West region (31.0). Knowsley had the 10th highest premature lung cancer mortality rate in England during 2010-12, out of 326 local authority areas

Knowsley had the 5th highest premature COPD mortality rate in England during 2010-12, out of 326 local authorities.

There were 718 deaths from respiratory disease between 2010 and 2012 in Knowsley, about 239 per year - this accounted for 17% of all deaths in Knowsley. Of these deaths, 205 were people under the age of 75. The premature mortality rate from respiratory disease in Knowsley between 2010 and 2012 was 42.0 deaths per 100,000 population. Greenbelt land and associated woodland is critical to off-setting carbon emissions generated from increased traffic flow and planned business growth of local business and industrial parks, increasing urban sprawl in this area will have a detrimental impact on air quality in Whiston.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Delete the words “, and SUE 2c Sustainable Urban Extensions - South Whiston and Land to the South of the M62”) and necessarily the links and other references throughout”.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

p) 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

A solid black rectangular box used to redact the signature of the respondent.

Date 13/11/2014

Date: 11 November 2014
Our ref: 132515



localplan@knowsley.gov.uk
BY EMAIL ONLY



Dear [REDACTED]

Planning consultation: Modifications to the Knowsley Local Plan

Thank you for your consultation on the above which was received by Natural England on 19 September 2014.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has the following comments to make on the Knowsley Local Plan and its further proposed main modifications. We note one of the key issues covered is the removal of the previous phasing mechanism covering the release of sites from the Green Belt to meet Knowsley's needs for new housing and employment development, with the 9 previously identified "reserve" locations for longer term release from the Green Belt up to 2028 are now proposed to be brought forward in the short term as site allocations in the Core Strategy.

Natural England welcomes: M117, 69, Policy CS8 clause 1b
1b. Sustain and promote biodiversity and (including designated sites, priority habitats and protected and endangered species) in accordance with importance and contribution to ecological networks (including protected and endangered species);

Natural England notes that M122 (PM29), 69, Policy CS8 clause 6c has been amended as follows:
6c. Seek to Protect, maintain and **where possible** enhance biodiversity within and around new developments, according to their designation and significance to provide space for nature; and. To enable adequate flexibility for consideration of circumstances where appropriate justification of limited opportunities for enhancement could be provided. '*Where possible*' has been added in, Natural England welcomed the previous iteration of this policy, which provided a more positive emphasis on the need to enhance the natural environment as well as protect it. We suggest it is should read, *seek to protect, maintain and enhance biodiversity*.

M123 (PM30), 69, Policy CS8 new clause 6d.
Provide adequate mitigation and / or, as a last resort, compensation for Green Infrastructure or biodiversity loss, in circumstances where harm resulting from the development is otherwise unavoidable.

Natural England notes to ensure consistency with the Council's intention to replace the Greenspace Standards and New Development SPD with a Developer Contributions SPD, we would expect to



see GI and GI standards fully incorporated into this new SPD.

M127, 73, Paragraph 5.95

New paragraphs 5.95A, 5.95B,

Natural England welcome the inclusion on new paragraphs detailing the Protection of Green Infrastructure, Natural Assets and Biodiversity.

M128, 73

New Paragraph 5.95D

In this section it would also be beneficial to add that any European and International sites affected by development will need to be considered in respect to the Habitats Regulations due to the fact that mitigation and compensation options in these cases will need to follow stringent tests set out in the regulations.

Habitats Regulations Assessment

Natural England note that the plan has undergone a further stage of Habitats Regulations Assessment to assess the impacts of the final proposed modifications on habitats, and in particular on "European Sites". It is noted the most significant proposed modification from an HRA point of view is the inclusion of Chapter 6 and the nine proposed Sustainable Urban Extensions (SUEs). Natural England agrees with the conclusions reached in this further assessment.

For any queries relating to the specific advice in this letter only please contact Kate Wheeler on [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED]

Yours sincerely

Kate Wheeler

Cheshire, Greater Manchester, Merseyside and Lancashire Area



Knowsley Plan: Strategy

Local Core



Proposed Modifications - Consultation Representations Form

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Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Mr	
Name	Martin Parker	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation 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.

I believe that the **Sustainability Appraisal of Knowsley Local Plan: Core Strategy Proposed Modifications – September 2014 is**

is unsound and fails to properly examine the impact of SUE2c on the Environment objective E.2

E2. To protect, enhance and manage biodiversity, the viability of protected and endangered species, habitats, geodiversity and sites of geological importance

Although a “desk-top” Habitat Assessment had been reported the evidence suggests that no detailed study of the ecology had taken place locally in recent years. (The Habitat assessment quotes assessment of vegetation by studying photographs). The Phase 1 Habitat Survey for the Land at south Whiston and south of the M62, Cronton was performed over 6 half days in mid October 2013 and acknowledged that further work was required to fully identify the fauna and flora potentially present in the area due to access and more si. No results have been published if this further work has taken place.

This study already identifies that the site contains areas of habitat that are of national ecological value. Release of such a large area of Green Belt does not seek to mitigate the impact on loss of biodiversity and habitats.

No mention is made in the Habitat Assessment on any impact of non-native invasive species on planned development. Ie Japanese Knotweed, Himalayan Balsam etc which are present . There is no evidence of a risk assessment being performed

If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Delete the words “, and SUE 2c

“Sustainable Urban Extensions - South Whiston and Land to the South of the M62”) and necessarily the links and other references throughout.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- a) Yes, I wish to participate at any further public hearing ✓
- b) No, I do not want 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

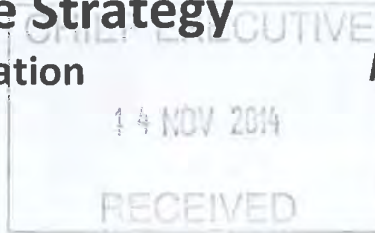
Knowsley Local Plan: Core Strategy

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	ROBIN LEMAX	
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 ROBIN LOMAX

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref KGBS 14 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 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.

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 SURVIVAL (RSPB 2014). THERE IS A SIGNIFICANT POPULATION THROUGHOUT THE LAND SURROUNDING BIG WATER AND OLD WOOD. SINCE THE 1970'S 87% OF THE POPULATION OF GREY PARTRIDGE HAS BEEN LOST NATIONALLY AS A DIRECT RESULT OF HABITAT FRAGMENTATION AND LOSS.

THE URBAN FRINGE WOODLAND OF OLD WOOD, BIG WATER AND THE SUPPORTIVE AGRICULTURAL LAND ALL WITHIN THE GREEN BELT OF SOUTH WHISTON ARE ESSENTIAL TO CONSERVATION OF THE ABUNDANCE OF WILD LIFE AND THEIR SUSTAINABLE FUTURE OF BOTH THE ENDANGERED SPECIES AND OTHER SPECIES THAT COULD DISAPPEAR FROM OUR AREA.

A FULL ECOLOGICAL AND HABITAT SURVEY HAS NOT BEEN UNDERTAKEN BY KMML.

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

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 Nov 2014

39. LATE REPRESENTATIONS

The following representations were received after the conclusion of the consultation period, and are presented here for information only.

Reference	Name
LATE REPRESENTATION 001	Amanda Fletcher
LATE REPRESENTATION 002	Angela Hennigan, Progressive Futures Care Ltd
LATE REPRESENTATION 003	Beryl Sutcliffe
LATE REPRESENTATION 004	David Cavenden
LATE REPRESENTATION 005	Irene Allen
LATE REPRESENTATION 006	Jackie Copley, CPRE
LATE REPRESENTATION 007	Jayne Tattan
LATE REPRESENTATION 008	Jayne Tattan and John Webster
LATE REPRESENTATION 009	Jim Blincow
LATE REPRESENTATION 010	Joseph Allen (1)
LATE REPRESENTATION 011	Joseph Allen (2)
LATE REPRESENTATION 012	John Fairhurst
LATE REPRESENTATION 013	John Kelly
LATE REPRESENTATION 014	Joseph Fairhurst
LATE REPRESENTATION 015	Jule Allen
LATE REPRESENTATION 016	Kenneth Morrow
LATE REPRESENTATION 017	Linda Morrow
LATE REPRESENTATION 018	Marilyn King
LATE REPRESENTATION 019	Michelle Kelly
LATE REPRESENTATION 020	Neil
LATE REPRESENTATION 021	Patricia Stewart
LATE REPRESENTATION 022	Paula Mandeville
LATE REPRESENTATION 023	Rachael King
LATE REPRESENTATION 024	Samantha Wood
LATE REPRESENTATION 025	Victoria Handley

LATE REPRESENTATION 001



12th November 2014

Programme Officer
Knowsley Local Plan Core Strategy Examination
Municipal Buildings...
Archway Road
Huyon
L36 9YU

To Whom It may Concern

KEEP OUR VILLAGE A VILLAGE. PLEASE DO NOT BUILD ON ALL THE BEAUTIFUL FIELDS SURROUNDING OUR VILLAGE. PLEASE KEEP THE LAND SAFE AND PROTECTED FOR THE FUTURE GENERATIONS OF KNOWSLEY RESIDENTS TO APPRECIATE.

I urge the council not to consider building on the Greenbelt or farmland, but to utilise many of the other concrete areas within Knowsley. These would more than meet the current housing demand.

Why is this important? What it would mean to the local community:

- The loss of a tremendous amount of Greenbelt and farmland
- the loss of wildlife in the woodland
- the loss of valuable open spaces
- disruption of pathways
- loss of natural break from the other nearby communities, creating an ugly urban sprawl
- an over capacity for local schools and doctors
- heavy traffic on local roads which are not suitable for the amount of housing proposed, they are already heavily used and always in a poor state of repair
- more excessive housing would increase the carbon footprint
- the village would lose its heritage

According to National surveys Knowsley is already the 10th unhealthiest place to live in the country! Please keep Knowsley Cleaner, Safer and Greener.

I would therefore like to voice my opposition to the proposal to release land in south Whiston from the green belt and ask you to also reject it for the following reasons.

- The projection of population expansion within Knowsley over the next 10 years contained within the Strategy is out of step with projections previously publicised by KMBC and out of step with latest population projections in 2014.
- The land at Whiston which is part of the Knowsley Unitary Development Plan forms a welcome breathing space for Knowsley residents and should be protected.
- The Land is Green Belt and a stringent policy avoiding any development has been recommended within the present Unitary Development Plan. As such it protects Knowsley from just being part of St Helens, Halton and Liverpool urban sprawl.
- These areas can provide valuable open space on the urban fringe with associated benefits including recreation, human health/enjoyment and biodiversity conservation.

Such areas are as follows:

Windy Arbor Road Playing Field - At Windy Arbor Road Playing Fields there are a number of football pitches and a pavilion.

Whiston Junior Football Club - a highly regarded club on Merseyside have utilised these pitches for a number of years. The organisers work hard on a voluntary basis all year round to help maintain the pitches and the pavilion and motivate local children to play and enjoy football.

Windy Arbor Road Fishing Pond - Whiston Town Council has a fishing pond which is currently operated by Whiston Village Angling Club. The Club work hard to maintain the area and try to ensure the pond is a safe and clean place for anglers to enjoy their hobby. The pond is used on a regular basis and by people of all ages with competitions being held regularly.

- This Local Plan does not follow national guidelines which states that *'The planning system should contribute to and enhance the natural and local environment by: 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...'[section109]*
'During the 20th century the United Kingdom lost over one hundred species of flora and fauna, and many more have been significantly reduced in number or habitat range. Reduction in biodiversity is often a result of a decrease in natural habitats, both in the land area they occupy and their variety.'
- The important hedgerow system, containing veteran trees, forms vital wildlife corridors with high biodiversity levels and is essential to reducing the isolation and fragmentation of this section of Ancient Woodland.
- Both the building of the road and the subsequent infill with housing will have a detrimental effect on the pockets of natural habitat that remains due to their fragmentation, isolation and decrease in size. This negative effect on biodiversity is well documented. 'Habitat loss and fragmentation impacts on the species diversity in the following ways:
Populations are moved into smaller and smaller areas which, ultimately, are unable to support them.
Populations become fragmented so that they become isolated into populations that are too small to be self-sustaining.
Areas of habitats are so small that the 'core area' decreases to such an extent that they are influenced by negative edge effects.'
- It is in opposition to the government views expressed by Greg Clark MP Minister for Planning... *'Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.'*
- The importance of landscape is identified by Natural England.
'Landscape is important, not just as scenery but because it links culture with nature, and the past with the present. It has many values, not all of them tangible (such as sense of place); and it matters to people – it is people who create and value landscape. Well-looked after and highly valued landscapes are essential to social well-being and an economically healthy society. We value our landscapes because of their inherent interest, their contribution to both our national identity and our local distinctiveness...'

- There has been no consideration of increased traffic within what is already a very congested area. The proposal will see on average an additional 2200 vehicles taking to local roads and as such is a clear destruction of the local inhabitant's quality of life. Whiston has no bus service after 7pm and these proposals make an already poor situation worse, especially for elderly people and young persons.

- Infrastructure and Development Options Study July 2014 – Knowsley Council and Mott McDonald states the following in relation to increase traffic for proposed sites:

Phase 1 - *The cumulative impact of the three sites is likely to generate a large number of trips, with the majority most likely being dispersed towards Tarbock Island, placing pressure upon the junction and Windy Arbor Road on its approach.*

Phase 2 - *There is evidence of existing local queuing at peak times on Lickers Lane and Windy Arbor Road. This site would generate additional trips which would place further pressure on the existing stress points.*

Right turns required into Lickers Lane from Windy Arbor Road will cause queues on the network during peak times, with additional trips likely to exacerbate the problem. The cumulative impact of sites 11 and 17 would also need to be considered as it is likely that they will impact upon the wider road network. Changes to local junctions are likely to be required to accommodate the additional trips from development at sites 14, 11 and 17 together. The site's proximity to Tarbock Island is likely to make it attractive for commuters but would increase movements.

Land South of M62 - *This high number of trips would have an impact upon the surrounding local road network, in particular A5080 Cronton Road and Fox's Bank Lane (which is not suitable for high flows of traffic).*

The site as it stands is relatively isolated from public transport links which will cause higher trip flows.

The introduction of sustainable transport links including walking, cycle and public transport provision to the site could help to reduce reliance on car trips.

The nature of the site may attract HGV movements which would add to congestion levels due to their restricted movement speeds. This will however depend upon the final use of the site.

In addition the cumulative impact of development on Windy Arbor Road (site 11) and Lickers Lane (site 14) will need to be considered. With extra trips from those developments also adding to the volume of traffic using the Tarbock Island interchange; it may make it more difficult for vehicles to emerge from the Cronton Road arm of the Tarbock Island interchange, which is currently unsignalised. Therefore, it is likely that queuing will occur at this arm of the junction.

- The land at Whiston has been in food production for living memory and given the explosion in global commodity prices, locally produced food is fast becoming a priority. Transport costs at an all-time high will increase food prices even more and our ability to produce food locally will be essential for our children and grandchildren.
- It doesn't address the issues about building on Green Belt as raised in the Government white paper produced by DEFRA

<http://www.defra.gov.uk/environment/natural/whitepaper/>

- It doesn't take into account the comments on Twitter by the Rt Hon Eric Pickles secretary of state for Communities and Local Government. **"Please remind planners that Councils must protect our precious green belt land"** <http://bit.ly/1vGG4An>
<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>
- The majority of Green Belt that will be left in Knowsley will be in the Knowsley Estate which most members of the public do not have access to.

Yours Sincerely



Miss Amanda Fletcher

LATE REPRESENTATION 002

Progressive Futures Care Ltd



Progressive Futures Care (PFC) has been in residency at Field view since 2009. The lease has recently been renewed in 2014 for a further five years.

PFC offers therapeutic support to all children, Field View is the ideal home to deliver this part of their care plan.

PFC provides care and support for some of the most vulnerable children within the knowsley area and surrounding areas. The Children who are resident at Field View have been identified as being at significant risk and in need of consistency and protection with regards to safeguarding.

Field View is an excellent environment for children who have been placed in the care of PFC to grow, develop, learn and feel safe. The surrounding land promotes calm and tranquillity which enables the young people in care to deal with the issues they have placed in care for.

PFC has a responsibility to the young people they care for to provide a suitable environment that gives young people in care the same opportunity as all other young people. That is to grow in to respectful, positive members of the knowsley community.

Kind Regards

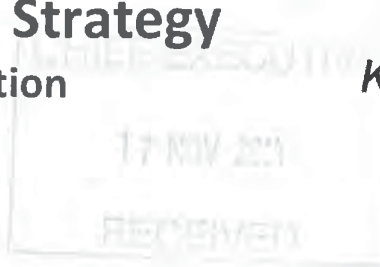
Misses Angela Hennigan



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
- 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	BERYL SUTCLIFFE	
Job Title (if appropriate)		
Organisation (if appropriate)	[REDACTED]	
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 BERYL SUTcliffe
SAVE OUR GREEN BELT

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref KGBS14 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 PROPOSED DEVELOPMENT WOULD CAUSE CHAOS ON THE ROADS IE EXHAUST FUMES, CONGESTION, DANGEROUS CROSSING ESPECIALLY FOR CHILDREN, THE WILDLIFE WOULD ALSO SUFFER, A GREATER POPULATION WOULD PUT A STRAIN ON THE SERVICES SUCH AS SCHOOLS DOCTORS AND HOSPITALS WHICH ARE ALREADY UNDER A STRAIN

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 IS THE LAST OF THE GREENBELT
PLEASE LEAVE IT ALONE
SO OUR FUTURE GENERATION
CAN ENJOY IT

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- 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

[REDACTED]

From: David Cavenden [REDACTED]
Sent: 16 November 2014 21:30
To: [REDACTED]
Subject: Objection to Knowsley Planning for proposed new New Houses in Halewood Village

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,

I would like to strongly object to the proposed council plan to build new houses in Halewood Village GREENBELT (east of Halewood Village).

I am deeply opposed to the councils plans to build circa 1000 houses in this area for the following reasons:

1. Designated GREENBELT when brown belt sites could be considered.
2. Local traffic congestion in Halewood Village impacting not just the village itself but surrounding roads i.e. Greensbridge Lane and Baileys Lane as a result of building an additional 1000 houses suggested by the councils plans.
3. Removal of Farm land at a time when local produce is being encouraged throughout the UK.
4. Removal of green spaces given there is a lack of local parks in this area.
5. No demand for increased housing in the area given the local population is decreasing hence where is the business case?
6. Increased pollution created by additional homes and associated increased traffic in the vicinity
7. Complete lack of 'real' consultation with local people. I found out by chance!
8. What are the exceptional circumstance for considering using Greenbelt? Eric Pickles recent policy changes dictates this.
9. Loss of natural wildlife in the area by removing GREENBELT
- 10 Previous council assurances in recent times that GREENBELT will remain protected.

I am astounded this is even a consideration and I have attended local residents meetings in Halewood Village where many people are equally dismayed by this plan. The news of the councils plan is now spreading wide and fast around Knowsley and I am aware that many residents are forming action groups to oppose this proposal.

I would ask the council consider the above and scrap the current plan and demonstrate they are listening to local people who the council represent.

I look forward to your reply.

Regards,

David Cavenden
[REDACTED]

Knowsley Local Plan: Core StrategyProposed Modifications - Consultation
Representations Form

Knowsley Council

RETURNING THIS FORM

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- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annex, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS**PART A - PERSONAL DETAILS**

	Personal Details*	Agents Details*
Title	MRS	Solicitor
Name	IRENE ALLEN	Middleton Solicitors
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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.

These representations relate to policy SUE1 and the link changes in policies CS2 & CSS

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. "The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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... ^{19th} November 2014



Local Plan Team,
Knowsley Council,
1st Floor Annexe, Municipal Buildings,
Archway Road,
Liverpool
L36 9YU



www.cprelancashire.org.uk

Working locally and nationally for a
beautiful and living countryside

14 November 2014

Dear Local Plan Team

CPRE Lancashire comments on Knowsley Local Plan: Core Strategy Schedule of Proposed Modifications to the Submission Document September 2014 - Consultation Version

Introduction

1. The Lancashire Branch of the Campaign to Protect England, which includes Greater Manchester and Merseyside, is delighted to respond to the above-mentioned consultation. Knowsley has some lovely rural places, and our charity seeks continued protection and enhancement of for the benefit of for future generations.
2. We recognise the critical role that the Local Plan and the continued use of Green Belt designation in delivering our aim of a beautiful and living countryside in the future. We read the documents and provide our detailed comments in Appendix A. CPRE promotes Smart Growth and we provide further details on how to achieve this in Appendix B.

Downgraded Population Growth

3. In our previous submission to the Council on 12 December 2012 we highlighted our positive support for much of the document, particularly the vision to provide 'attractive, sustainable neighbourhoods' and to adopt a 'plan, manage and monitor approach to housing delivery. However, we did highlight our concern that the scale of housing development set out in Policy CS3 was too large, and unjustified given the trend of population decline.
4. To add weight to this argument, in June 2014 the announcement on the downgraded population growth estimates by the Office of National Statistics, means Knowsley now requires a reduction in predicted housing numbers for its local plan making purposes. The full datasets can be found at <http://www.ons.gov.uk/ons/rel/snpp/sub-national-population-projections/2012-based-projections/index.html> We believe this recent reduction in forecast population and associated household formation therefore means less housing should be

planned for in Knowsley and query what has Knowsley Council done about getting revised household projections?

National Planning Policy Framework - Absence of a Local Plan and/or Five Year Housing Land Supply

5. The National Planning Policy Framework (NPPF) is clear that where the local plan is absent or a five-year housing land supply cannot be demonstrated there is a presumption in favour of sustainable development. In July we evidenced the powerful threat to countryside posed by the operation of the five-year housing land supply (as defined by Paragraph 47 and qualified by Note 11). We show the loss of greenfield land at appeal, including Green Belt, for housing development at an alarming rate, frequently against local wishes. We understand the potential for 'land-banking' of sites (especially brownfield) to promote the release of most profitable greenfield and this is something our charity is calling on Government to tackle. Our report can be viewed here: <http://www.cprelancashire.org.uk/campaigns/housing-and-planning/housing/the-issues/item/2144-five-year-housing-land-supply>.
6. CPRE Lancashire therefore recognises that Knowsley needs a Local Plan based on sound strategic planning and sustainable development principles, as soon as possible as without planning policy protection speculative developers can continue with 'unstrategic' and sporadic development which seriously degrades the quality of rural places.

Revised Planning Practice Guidance (PG)

7. In October 2014 the Government revised Planning Practice Guidance (PG) to try and make the operation of the NPPF more balanced with regards to environmental protections. There is no doubt as to the government's motivation in making the revision; in the words of the Secretary of State for the DCLG "protecting our precious Green Belt must be paramount".
8. Accordingly, we urge the Council to follow the procedure specified by the High Court ruling in the case of Gallaher Homes, viz. first estimate the amount of land required to meet objectively assessed need without regard to supply considerations (OAN policy-off) and then take account of supply considerations to obtain OAN policy-on (or the "housing target" in the nomenclature of the Planning Advisory Service). Taking the policies of the NPPF as a whole and applying its protections of Green Belt land, those Green Belt sites which fail to satisfy one or more of the five purposes of the Green Belt should be excluded for re-designation for residential development unless the benefit of doing so were to outweigh the harm done to the Green Belt. Green Belt land so excluded should be taken into account in estimating the housing target and compliance with the 5-year housing land supply rule should be judged by reference to the housing target (not OAN policy-off). In this way, a balance can be struck between economic, social and environmental roles; we believe Knowsley Council can significantly reduce the loss of Green Belt and still achieve a sound local plan.

Sequential Development - Brownfield first, planned urban extensions after

9. CPRE Lancashire recommends that finding the most sustainable sites, with a brownfield first emphasis, and achieving quality urban design should be the highest priorities in the Local Plan. Knowsley ought to first prioritise its brownfield reserves in advance of bulldozing farmland and

wildlife havens and we suggest a brownfield target in the Local Plan. The NPPF Paragraph 111 also states Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land). It goes on to say local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land. In the 6 October press release Eric Pickles said *'Today's guidance will ensure councils can meet their housing needs by prioritising brownfield sites, and fortify the green belt in their area.'* CPRE Lancashire believes that Knowsley Council and the Examination Inspector should ensure brownfield first development is enshrined in the local plan.

10. CPRE Lancashire believes there is still a significant amount of brownfield land that can be used to accommodate new and replacement housing in the principal regeneration areas of North Huyton and Stockbridge Village, Kirkby, Tower Hill, Prescott, South Prescott and Knowsley Industrial and Business Parks. Knowsley is the fifth most deprived district in the country and regeneration is important. Release of Green Belt could hamper the chances of brownfield land in the poorest places being brought back into beneficial use. We continue to believe planning policy in Knowsley ought to galvanise previous public sector investment by steering new investment into urban areas not always defaulting to the urban and rural fringe.
11. Where brownfield land is unavailable then planned urban extensions are best, but CPRE promotes the use of comprehensive Green Belt Reviews to understand fully the likely impacts with full regard to sustainable development principles.

Green Belt Review

12. As you may know, Green Belt is important to CPRE as our countryside charity was involved in this planning policy designation being introduced by Government in the 1950s. Since its introduction Green Belt has been an effective tool for planners in maintaining open green space around our towns and cities for enjoyment - simply because it exists.
13. Green Belts have a higher concentration of public rights of way, broad-leaf and mixed woodland, Country Parks, Local Nature Reserves, and Registered (or historic) Parks and Gardens, than other land. The breakdown of land cover types in the Green Belts are approximately 35% of the area covered by arable / horticultural land; 25% improved grassland, and 14% semi-natural grass. We continue to believe strongly in the five purposes of Green Belt for regeneration, openness and separation, prevention of sprawl and encroachment, and permanence. We understand the health benefits of people being able to access recreation and leisure pursuits in local countryside and the heightened quality of life it brings.
14. We welcomed the announcement by Communities Secretary Eric Pickles and Housing and Planning Minister Brandon Lewis, on Monday 6th October 2014, who said brownfield sites should be prioritised and Green Belt protected. We believe the Government's intention should be enshrined in Knowsley Councils Local Plan policies.
15. If Green Belt must be released for development we would say it should be the subject of a proper strategic review and if land serves any of the five purposes it must have continued protection. In advance of such a criteria based evaluation process we cannot be sure of the relative value of the following proposed extensions:

- 1. Sustainable Urban Extension: Bank Lane, Kirkby
- 2. Sustainable Urban Extension: East of Knowsley Industrial and Business Parks, Kirkby
- 3. Sustainable Urban Extension: Knowsley Lane, Huyton
- 4. Sustainable Urban Extension: Edenhurst Avenue, Huyton
- 5. Sustainable Urban Extension: Land bounded by A58, Prescot
- 6. Sustainable Urban Extension: Carr Lane, Prescot
- 7. Sustainable Urban Extension: East of Halewood
- 8. Sustainable Urban Extension: South of Whiston & Land South of M62
- 9. Land Safeguarded for Future Urban Extension: Land at Knowsley Village

16. CPRE Lancashire campaigns to defend Green Belt and we would need to understand the significance of any of the above being released. Clearly there is an adverse impact to Green Belt purpose if it is developed.

'Best and Most Versatile Land'

17. Any strategic review of Green Belt should consider farmland quality as well as five Green Belt purposes. Land of highest agricultural quality (Grades 1, 2 and 3) should be retained to support the rural economy, rural employment and local food networks. Grade 1 farmland constitutes only 3.1% of all farmland and should therefore be treated as an irreplaceable asset of great value. We should not adversely and irreversibly develop on our most fertile lands as a matter of food security issue.

Phasing

18. If Green Belt must be released as a 'very last resort' for development, subject to a comprehensive Green Belt Review, we would argue that this land should be 'safeguarded' to later or following the plan period to support Brownfield land reuse and sustainable development principles.

19. We are opposed to the removal of a phasing policy for employment and housing land. We recommend that Green Belt sites and brownfield sites should be allocated to the 1-5, 6-10 and 11-15 year periods according to the desirability of retaining it (Green Belt) or developing it (brownfield).

Smart Growth

20. CPRE believes people deserve quality housing with sustainable transport links and adequate local amenities, such as doctors and shops. We therefore advocate 'Smart Growth', a sustainable approach to planning that emphasises compact and accessible urban communities and which opposes urban sprawl and car dependency. It seeks traditional ways of planning towns based around local services, ease of walking and cycling and good public transport, especially rail-based. It looks for ways to re-build our lost sense of community.

Summary

21. In summary, CPRE wishes Knowsley Council every success in the progression of the Local Plan which facilitates economic and social prosperity, and at the same time looks after the countryside. The different aims are not mutually exclusive. Key points raised are:

- CPRE believes adequate housing ought to be planned for reflecting up to date population projections;
- We urge for a stronger brownfield first approach to land use planning in Knowsley with use of a local brownfield target in the Local Plan that promotes the principles of 'Smart Growth'.
- CPRE Lancashire remains unconvinced that Green Belt release is justified due to downgraded population and household forecasts. But, if Green Belt land is to be re-designated we would wish to see a comprehensive Green Belt review to sensibly inform the selection of sites based on sustainable development principles.

22. Please let me know if you require further information.

23. Please also note that we wish to be involved in ongoing consultations.

Yours sincerely



JACKIE COPLEY, MRTPI, MA, BA (Hons), PgCert

Planning Manager, CPRE Lancashire Branch

Tel: 

E-mail: 

Patron
Her Majesty The Queen

President
Sir Andrew Motion

Branch Chairman
Andrew Harris FRICS FCIM

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Appendix A - Detailed comments:

Ref MO01 Paragraph 1.3 The Core Strategy also includes site allocations for areas to be removed from the Green Belt to meet future development needs, referred to as "Sustainable Urban Extensions" and on which further details are set out in chapter 6A. CPRE Lancashire believes it is premature for the additional text to be added.

CPRE Lancashire notes that Brownfield/Previously developed land is only referred to twice in the whole document.

Ref: *M056B Paragraph 5.195.19 Policy CS 3 complies with national planning policy for housing, including the need to have a flexible and responsive supply of housing land continually available. The policy particularly emphasises the importance of maintaining a "five year supply" of housing land, in accordance with national planning policy (including an allowance to address any shortfall accrued to date against the target within a five year period and an additional "buffer" of either 5% or 20%. The buffer required may change throughout the plan period in line with future monitoring. This will be reported on an annual basis via the Council's Strategic Housing Land Availability Assessment and/or Monitoring Reports). The approach of "plan, monitor, manage" will be employed, with the policy indicating that management of land should be efficient and effective whilst protecting brownfield regeneration priorities. Policy CS 3 also complies with the national policy priority to focus new development on previously developed land.*

Ref M042 page 36 Policy CS1, clause 1The spatial development of Knowsley to 2028 will be achieved by:

- a. *A focus on development within existing urban areas, with emphasis upon areas that are within or easily accessible from areas in need of regeneration;*
- b. *Maintenance of the existing settlement hierarchy, including the role of Huyton / Stockbridge Village, Kirkby, Prescot / Whiston and Halewood as larger suburban centres, and of Cronton, Tarbock and Knowsley Village as rural villages;*
- c. *Maximising Knowsley's contribution to the development of the Liverpool City Region and key sub-regional projects;*
- d. *An efficient and sustainable use of land and infrastructure, encouraging where possible the reclamation and reuse of previously developed land; and*
- e. *A review of Green Belt boundaries to meet longer term Removal of the Sustainable Urban Extensions identified in policies SUE 1, SUE 2, SUE 2a, SUE 2b, and SUE 2c from the Green Belt to help meet needs for housing and employment development, and maintaining the openness of remaining Green Belt areas.*

Reasons: To ensure consistency with the new policies SUE 1, SUE 2, SUE 2a, SUE 2b, SUE 2c concerning the Sustainable Urban Extensions.

CPRE Lancashire believes much more should be done to facilitate brownfield land redevelopment including the use of a Brownfield target. We are opposed to the identification of sustainable urban extensions in advance of a comprehensive Green Belt Review.

Ref M012 adds 1.28A Planning Practice Guidance was published in March 2014 as a web based resource to assist the implementation of the National Planning Policy Framework. The preparation of the Core Strategy has taken account of the specific requirements relating to plan making.

CPRE calls for reference in the Local Plan to the October Statement by the Communities Secretary to protect Green Belt and reuse Brownfield. This ought to be considered by the Examination Inspector.

Ref M014 adds An update to the Housing Strategy is under preparation for 2015 onwards.

CPRE Lancashire suggests the following replacement text "As part of the planning, monitor and manage approach the Local Plan evidence base for housing strategy will be subject to regular reviews in accordance with Government Planning Practice Guidance."

Ref M020 This section also includes a range of policies relating to Sustainable Urban Extensions (SUEs) proposed in parts of Knowsley to meet residential and employment development needs.

CPRE has noted the inclusion of this text. We would hope land could be 'safeguarded' until after the plan period or refer to phasing later in the life of the plan based on plan, monitor and manage approach so it is generally understood that greenfield development is not being promoted in advance of brownfield land reuse. Promotion of greenfield land development which is currently protected by Green Belt designation is unsustainable.

Ref M057 (PM11) CPRE Lancashire supports the insertion of text to clarify the type of houses to be built should reflect needs identified in the Strategic Housing Market Assessment particularly concerning affordable housing in rural areas.

Ref M127 CPRE is supportive of the inclusion of the new text concerning Natural Assets and Biodiversity.

Ref M206 CPRE is pleased to see that the Forestry Commission will be consulted where development proposals contain or are likely to affect Ancient Semi Natural woodlands or Plantations on Ancient Woodland Sites.

Appendix B - WHAT IS SMART GROWTH?

Smart Growth is a sustainable approach to planning that emphasises compact and accessible urban communities and which opposes urban sprawl and car dependency. It seeks traditional ways of planning towns based around local services, ease of walking and cycling and good public transport, especially rail-based. It looks for ways to re-build our lost sense of community.

Here in the UK we are rightly proud of our historic towns and cities, our beautiful countryside and a planning system which protects the environment. But, for a whole string of reasons, our small and overcrowded country has spent 100 years building urban sprawl and creating a transport system fatally dependent on the car and the motor lorry. Despite its large areas of moor and mountain, the UK is a very densely populated country and England is now Europe's most densely populated country.

Parts of it are short of water and there is strong opposition to the urban sprawl which some argue is necessary to house our population. Climate change means we need to use less fossil fuel, yet we have a transport system which accounts for more than a quarter of our emissions, our public transport is expensive and often inadequate and the fabric and economies of many of our towns and cities have decayed.

Smart growth has its origins in a country where the damage done by sprawl, car dependency and urban deprivation far exceed our own mistakes - America. Yet extreme challenges often prompt the best solutions and over the past 20 years the Smart Growth movement has increasingly tackled these problems. Today, many US inner cities are regenerating economically and socially and being equipped with the rail-based public transport many of our cities desperately need. Cities are being remodelled to allow people to walk or cycle and are challenging America's fatal car dependency. Meanwhile its sprawling suburbs are feeling the chill wind of higher gas prices, falling house prices and social decline.

Recent years have seen discussions among environmental groups about ways of mirroring these successes here in the UK. A group of environmental NGOs formulated and agreed a set of principles for Smart Growth in the UK for use in planning, community development and urban regeneration.

THE SMART GROWTH UK PRINCIPLES

Plan Compact Communities

Smart Growth promotes well designed, compact, functional communities and rejects land-hungry sprawl and wastage of greenfield land.

Strengthen and direct development towards existing communities

Smart Growth emphasises use of communities' existing infrastructure and resources and conserves open spaces and urban fringes.

Provide sustainable transport choices

Smart Growth reduces dependence on road transport and increases opportunities for walking, cycling and public transport. Towns, cities and villages should be pedestrian -friendly and rail-accessible.

Protect the unbuilt environment

Smart Growth believes our countryside and open space is a precious environmental, social and economic resource. It should be protected and husbanded if we are to move towards a more sustainable society. Squandering it will create, not solve, problems for our towns and will do nothing for our national economy.

Foster distinctive, attractive communities with a strong sense of place

Smart Growth encourages communities to develop their own identity and vision, respecting their cultural and architectural heritage. It supports human-scale development and opposes large, monolithic developments, out-of-town retailing and 'big box' architecture.

Mix land uses

Smart Growth supports a sensible mix of land uses to suit communities and their daily needs.

Encourage communities to flourish and grow

Smart growth supports mixed-income, mixed-age, inclusive communities that take responsibility for their own development. Local communities should be developed to make them more self supporting.

Create a range of housing opportunities and choice

Smart Growth supports quality living for people of all income groups, ages and needs. We want human scale development at appropriate densities to support sustainable transportation and local facilities.

Make development decisions fair and economically inclusive

For communities to successfully implement Smart Growth they must ensure all three sectors of the economy - public, private and community - function successfully and sustainably.

Text reproduced from Smart Growth UK website www.smartgrowthuk.org

[REDACTED]

From: [REDACTED]
Sent: 17 November 2014 10:23
To: [REDACTED]
Subject: FW: Knowsley Greenbelt - Public Meeting held on Wednesday 12 November 2014

Follow Up Flag: Follow up
Flag Status: Completed

From: Jayne Tattan [REDACTED]
Sent: 17 November 2014 09:28
To: [REDACTED]
Subject: Knowsley Greenbelt - Public Meeting held on Wednesday 12 November 2014

Dear Mr Pike,

On Wednesday 12th November 2014, less than 24 hours before submission for Representations, George Howarth MP, for parts of Knowsley, held a public meeting.

I am one of the Residents who attended this meeting and cannot believe some of the comments and statements that have been made from both George Howarth MP and Councillors.

This meeting was recorded and I have attached a link for your perusal <http://youtu.be/JmNRCd5OrPk> I speak throughout the meeting, however, my own main points are made from approx. 1:16:00 however, I would strongly advise that the whole meeting be viewed, to get an accurate view of what was said.

George Howarth MP has offered a discreet meeting with Residents affected by the change of use to the Edenhurst Sportsfield Site in Bowring Park, which I am yet to have confirmed, clearly a meeting that can only take place after the deadline for Representations.

In the meeting, I believe, that some of the Knowsley Councillors make some very concerning and misleading statements. It is also clear that George Howarth MP is clearly unsure about what he is talking about and also makes some claims that contradict what Residents are being led to believe in respect of the Green Belt in Knowsley.

In my opinion the council have not been 'forced' to release greenbelt by you, the Inspector, again, which is what Residents are being led to believe.

This information has been taken from the Green Belt Technical Report produced by Knowsley Council which sets out Knowsley Council's reasons for wanting to remove the greenbelt protection (remember 'it's not us it's the inspector. He's making us do it)

~ 2.6 Taking into account the findings of the evidence base, and the need to ensure delivery of Knowsley's housing and employment needs throughout the plan period, the Council believe "exceptional circumstances" exist for a localised review of the Green Belt boundary. Therefore, the Council has identified a range of "broad locations" within the existing Green Belt where the boundary will be reviewed to meet future development needs.

http://www.knowsley.gov.uk/.../TR03_GreenBelt-Technical%20Rep...

http://www.knowsley.gov.uk/.../CR12_Approval_of_Supporting_Do...

ITEM 4.2 ~ 'and a detailed justification as why the Inspector should support the Council's preferred approach' The Council's 'preferred' approach.....

5.11 Additionally, the Council received information during public consultation in 2011, which related to a number of the Green Belt locations included in the Strategy. In these examples, the development capacity put forward by Developers / landowners broadly supported the Council's assumptions,

5.12 To supplement this evidence, further work undertaken by the Council in relation to flood risk and transport feasibility has reaffirmed the Council's original assumptions within the Green Belt Study.

5.27 A number of the Green Belt locations contain ecological assets (i.e. Priority Habitats and Local Wildlife Sites). Although local and national planning policies afford these assets protection earlier sections of this report

5.13 –

5.22 have demonstrated that a balance needs to be struck in order to meet the Borough's development requirements.

In one of the documents the council have used "Urban Vision" as consultants. I think this is them. Have a browse.

<http://uvns.org/objects-of-urban-vision-enterprise>

Note the consultations how well planned and laid out they are, however, Knowsleys attempt is disappointing and not as clear. I wonder who they might have links with?

So Knowsley continue to argue that it is the **Inspector** who is directing them to release the Greenbelt and they have to comply....."The Secretary of State will consider exercising his statutory powers of intervention in Local Plans before they are adopted where a planning inspector has recommended a Green belt review that is not supported by the local planning authority".

<http://www.actionalliance.org.uk/node/155>

One more, very concerning, point:-

Any "change of use" statement is extremely worrying and could be viewed as misleading. It almost feels like there is a smokescreen into how many houses may actually be proposed to be built. Knowsley is one of, if not the, poorest Borough's in England. I sincerely hope that any suggested "change of use" to the areas is not such that they could be utilised for such things as industrial (fracking) waste disposal or gases obtained through fracking. I hope that there isn't suddenly a miraculous withdrawal of how many houses are actually proposed for this to be replaced with an even more dangerous newer proposal of business and a Company manoeuvre for fracking or worse!

Please cast your mind back to the Kirkby "Ski Slope" and what an unmitigated disaster that turned out to be. If you are not aware I have attached a link to a website so you can see just what scurrilous people have been in charge of Knowsley in recent years. However, it seems that any substantial information on this matter is limited throughout the internet. I would like to point out that key members of the Council were charged and served custodial sentences for what they did in respect of the Ski Slope at Kirkby.

"The people may have changed, however, the culture stays the same"...maybe?

http://www.kirkbytimes.co.uk/knowsley_council/news_ltd_chapter_8.html

Not so long ago, Knowsley's boundary was part of Lancashire, an area identified for fracking. With disused mines in Knowsley Village, which from an engineering point of view would be virtually impossible to build on, it has raised my suspicions. I sincerely hope that any overriding financial gain from companies involved in Fracking does not allow for a possible environmental and human disaster for the Borough of Knowsley.

Kind regards,

Jayne

Jayne Tattan

Tattyhead Emails

The content in this email is Private & Confidential. If you have been sent this email in error, please notify the sender and delete from your files. Thank you.

The heated meeting between Knowsley MP George Howarth, Knowsley Councillors and Huyton Residents over the local plan and the release of greenbelt.

<http://youtu.be/JmNRCd5OrPk>

[REDACTED]

From: Jayne Tattan [REDACTED]
Sent: 18 November 2014 12:40
To: [REDACTED]
Cc: [REDACTED]
Subject: Implications of the New Green Space Strategy of KMBC

Follow Up Flag: Follow up
Flag Status: Flagged

Dear [REDACTED]

THE PLAN has not taken into account the current new Green Space Strategy policy document submitted by KMBC, dated recently 19 June 2014 authorised by CEO Sheena Ramsey entitled "The Natural Approach to a Thriving Borough".

We, therefore request a re-drafting of THE PLAN based on these policy considerations.

Kind regards,

John Webster

Roby Residents Action Group

Jayne

Tattyhead Emails.

The contents of this email are Private & Confidential. If you are not the intended recipient, please inform the sender and delete from your files. Any information contained in this email must not be used to spread untruths.

Thank you.



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- > By email: LocalPlan@knowslev.gov.uk
- > By Post: Local Plan Team, Knowsley MBC, 1st Floor Annex, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR.	Solicitor
Name	Jim Blincow	Middleton Solicitors
Job Title (if appropriate)		
Organisation (if appropriate)	[REDACTED]	
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

These representations relate to policy SUE1 and the link changes in policies CS2 & CSS

- It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.
- The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

1) All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

2) KGBS 5 Pinfold Lane.
I support the recommendations in the Core Strategy document to be retained as Green Belt.

My family have been associated with Knowsley Village for a long time (My Great Grandfather set up and ran Jacksons Garage', now the petrol station).

The village was awarded Conservation Area Status and I am sure that the Character Assessment would have been undertaken & that the stated developments would 'go against' the findings of the assessments. I support KBC stance on protection and preservation of Conservation zones and the environment in general, quoting *Continue on a separate sheet if necessary...* KBC 'Keeping Clean & Green'. I object to developments in Knowsley Village as outlined in the Core Strategy.

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature. 

Date.....14.....November 2014

CHIEF EXECUTIVE
27 NOV 2014

Local Plan Team, Knowsley MBC,
1st Floor Annex, Municipal Buildings,
Archway Road, Liverpool, M36 9YU.



Dated: Thursday 13th November 2014

Green Belt Modifications at Knowsley Village Reference KGBS 6

Dear Sir / Madam,

I am writing regarding the Green Belt modification at Knowsley Village reference KGBS 6 in the local plan for 2014. I believe the planned changes are irresponsible, are based on a planning horizon that is too long to avoid risk and deliver certainty, will destroy the character of Knowsley Village and compromise the Knowsley Village Conservation Area.

I challenge the modification on the following **material** grounds:

- **Existing policy:** the modification contradicts local, strategic and national planning policies;
- **Highway issues:** Knowsley Lane cannot accommodate the volume of traffic that will be generated by extended development generating adverse community and economic impact;
- **Capacity of physical infrastructure:** the introduction of over 50% more dwellings would impose disruption by demanding that existing infrastructure is renewed AND cause issues in the drainage at Knowsley Village which is already problematic;
- **Nature conservation:** there will be significant negative impacts on the Conversation Area;
- **Unacceptable pollution:** aspects of Knowsley Village are high polluted, adding c1,000 homes and cars will exacerbate this issue with the potential to cause healthcare problems.

And the following **non-material** grounds:

- **Problems arising from the construction period:** a protracted development period will subject existing residents to excessive disruption, noise, pollution, service interruption and delays;
- **Loss of view:** many residents have chosen Knowsley Village due to its scenic nature and the quality of outlook available from many properties especially those at the outskirts;
- **Loss of property value:** the economic law of supply and demand suggests that the greater availability of property will have an adverse effect on price, a period of flat house prices would enable this phenomenon to be examined and proven.

We, the residents of Knowsley Village petition the planning department of Knowsley MBC to:

a) listen to the residents they represent, and b) remove all references to the site at Knowsley Village [KGBS 6] from the local plan, and instead c) work to improve release of Brown Belt land for redevelopment, and d) recognise that Liverpool City Council can deliver a greater number of houses, offsetting the need to forfeit valuable Green Belt land in Knowsley.

Yours Sincerely,





Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation
Representations Form

Knowsley Council

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PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	Solicitor
Name	JOSEPH ALLEN	Middleton Solicitors
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

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Name and/or Organisation

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- | | Yes | No |
|--|--------------------------|-------------------------------------|
| a) Legally Compliant (see guidance note 2.2) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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These representations relate to policy SUE1 and the link changes in policies CS2 & CSS

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

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Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

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Signature.....

Date.....^{19th}.....November 2014



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JOHN FAIRMURST	
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 FAIRHURST

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.

- ① THIS IS ONE OF THE LAST AREAS OF GREENBELT IN THE WHISTON AREA AND RESIDENTS WILL LOSE ACCESS TO THIS NATURAL ENVIRONMENT
- ② THIS DEVELOPMENT WILL ALSO AFFECT THE LOCAL WILDLIFE IE BIRDS ETC
- ③ A BIG EFFECT WILL BE ON BEES WHO ARE DECLINING NATIONALLY AND OBVIOUSLY BEES AFFECT US PERSONALLY AS THEY HELP TO MAKE FOOD FOR US SO ANY LOSS COULD AFFECT FUTURE GENERATIONS.

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

This Development will effect local services ie Shops + Doctors Surgeries, ie more shops would be Required To serve the new houses, were would people see a local doctor when they are full now. Local Roads would become Gridlocked leading to an Increase in Accidents And The Effect from pollution.
Whiston hospital would have a problem coping with the Extra people which would effect the current Residents of Whiston And the local Area ie waiting times And cancellations. I now Recently patients had to be sent to the Royal Because A+E was full My own Daughters operation was cancelled Because there wasnt a Bed Available.
This could obviously effect LIFE + DEATH
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 7/11/14

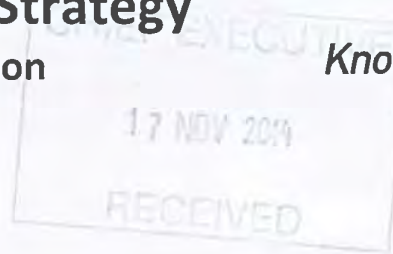


Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

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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	Mr.	
Name	John Kelly	
Job Title (if appropriate)	Deputy Director	
Organisation (if appropriate)	UKVI	
Postal Address	[Redacted]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

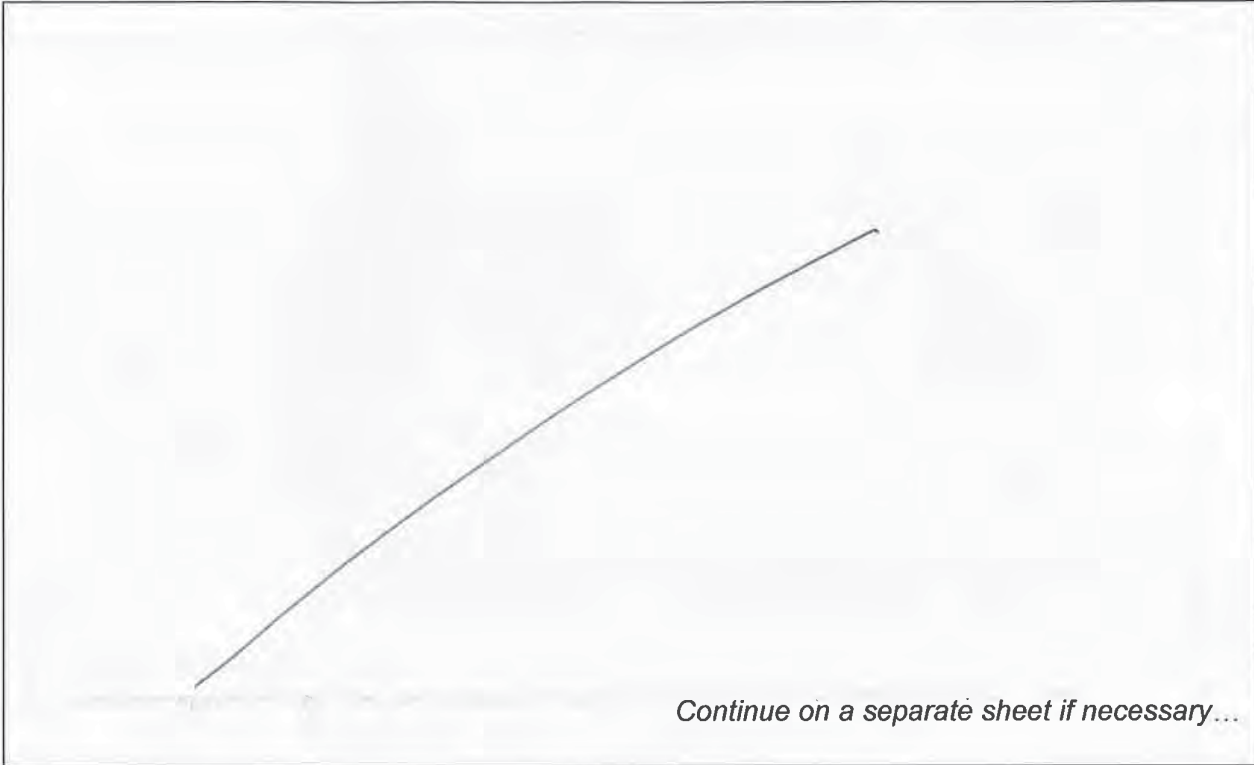
- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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 CURRENT INFRASTRUCTURE WILL NOT SUPPORT THIS NEW DEVELOPMENT - M57/62 INTERCHANGE WILL NOT COPE WITH ADDITIONAL CARS. HOUSES WOULD BE BUILT ON A FLOODPLAIN & OVER A MINING SITE. WHY NOT BUILD ON BROWNSIDE AND NOT BLIGHT 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.



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 2-11-14



Knowsley Council

Knowsley Local Plan: Core Strategy

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A - PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	JOSEPH FAIRHURST	
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 JOSEPH FAIRHURST

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref K6-DS14 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.

THIS DEVELOPMENT WOULD EFFECT LOCAL WILDLIFE IE BIRDS + BEES. CURRENTLY THE BEE POPULATION IS DROPPING NATIONALLY AND THIS DEVELOPMENT WONT HELP. BEES OBVIOUSLY HELP OUR FOOD INDUSTRY BY POLLINATING THE FLOWERS + PLANTS.

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 LIVE IN WINDY ARBOR CLOSE AND WERE THIS DEVELOPMENT WOULD TAKE PLACE HAS USUALLY FLOODED SO COULD WINDY ARBOR CLOSE FLOOD WHEN THIS DEVELOPMENT TAKES PLACE BY ALTERING THE WATER TABLE. ALSO WINDY ARBOR ROAD WOULD BECOME CONGESTED BY THE EXTRA TRAFFIC WHICH WOULD MAKE IT A DANGEROUS ROAD TO CROSS. ALSO WE WOULD NEED SCHOOL PLACES FOR THE CHILDREN BUT ALL THE LOCAL SCHOOLS ARE FULL. I THINK THIS DEVELOPMENT HASN'T BEEN WELL THOUGHT ABOUT.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

- 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

7/11/14



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	Solicitor
Name	JULIE ALLEN	Middleton Solicitors
Job Title (if appropriate)	HAIR STYLIST	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B - YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Save Knowsley Village Green Belt Group

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

Policy Ref

SUE1 AppE

Paragraph Ref

2 and 6A.9

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes No

a) Legally Compliant (see guidance note 2.2)



b) Sound? (see guidance note 2.3)



3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements - see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

These representations relate to policy SUE1 and the link changes in policies CS2 & CSS

a. It is considered that the plan is not legally compliant because the level of consultation is insufficient. The nature of the change is so extensive that all of the residents in Knowsley Village ought to have been notified of the proposed change having particular regard to the Government's commitment to deliver real local democracy through the localism agenda.

b. The proposed changes to the Core Strategy to take out of the Green Belt 58.29 ha of land at Knowsley Village are unsound. The relevant policies are CS2, CSS and SUE1 and Appendix E of the proposed Core Strategy. It is proposed to develop 1093 dwellings on the land at Knowsley Village.

The changes initially propose the removal of the site [KGBS 6] from the Green Belt and its safeguarding until after 2028 to meet housing needs thereafter within Knowsley unless a demonstrable need is established prior to 2028. That approach is unsound.

National Planning Policy advice is not to release land from the Green Belt unless exceptional circumstances are demonstrated. In this case the Council rely on a perceived need after 2028 to justify the release of land now. In the field of planning and housing need in particular it is inherently difficult to predict the level of need 14 years ahead - it can be no more than speculative

Furthermore, there may very well be alternatives to developing this Green Belt site. For example, there is a surplus of land within the administrative area of Liverpool which could meet the housing need [if it arises] in Knowsley after 2028. Liverpool City Council is in the process of preparing a local plan for its area [its draft core strategy was not progressed after 2012] and it is unclear what if any attempt has been made by Knowsley Borough Council to engage in that process. There is ample time available before 2028 to determine whether can accommodate some or all of Knowsley's housing needs after [principally] 2028 should they arise following monitoring and consideration of new information that may come along. Accordingly, it is premature to release site KGBS 6 from the Green Belt and the proposed changes are unsound. We draw attention to paragraph 2.26 of the Knowsley and Sefton Green Belt Study, Spatial Option B and paragraph 84 of the NPPF.

The proposal to develop more than 58 ha of Green Belt land at Knowsley Village represents a completely disproportionate extension of the Village. It will not protect what is locally distinctive about Knowsley Village [see strategic objective 5 of the proposed Core Strategy] nor will it protect the character and quality of one of the most rural of the villages in Merseyside with one of the best village cores [see the Conversation Area Appraisal 2005 - document AD 05] contrary to the vision and objectives set out on page 28 of the Core Strategy. Nor will it protect adjacent heritage assets or biological interest both on and near the site.

The Council have recognised Knowsley Village is not well served by public transport and only a limited range of services exist there. Inevitably, the Council concluded that site KGBS 6 would be a location where car dependency would pre-dominate which is not going to significantly change with the measures that may be mentioned in any transport plan for the site. It is inherent that the site would fall foul of Principles 2,3 and 4 of the Core Strategy policy 2 i.e. the development principles that seek to reduce the carbon emissions, reduce the need to travel, especially by car and the need to recognise the environmental limits of the location [page 39 of the Core Strategy], Reference will be made to paragraph 84 on the NPPF in this regard.

There is further limb to the sustainability part of the argument. It is this - because the site is so sensitive the Council have been driven to reducing the average density on the site to 25/ha compared to an estimated 35/ha on other sites. The result is that the proposal is land hungry [some 28% more land hungry] than other sites, it is quite unsound to promote land hungry development in the Green Belt. The Secretary of State has very recently [6 October 2014] made clear the Government's commitment to protect the Green Belt and to ensure their boundaries are not altered without there being exceptional circumstances. Moreover, he has stated that housing need of itself does not justify loss of Green Belt. It is perverse to remove land from the Green Belt when its effect is to target sensitive locations that require more land than necessary elsewhere.

Local people jealously guard their Green Belt whether in Bracknell or Knowsley. They provide a green lung and the Green Belt around Knowsley Village is well used by local people. They find it inconceivable that the planning system can permit the loss of 58 ha of open land and the building of almost 1100 houses in their small community. It is disproportionate and unsound. The inspector is invited to conclude that the site KGBS 6 should remain in Green Belt.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

All reference to the site at Knowsley Village [KGBS 6] being removed from the Green Belt and safeguarded for future housing development in the Core Strategy should be deleted.

Continue on a separate sheet if necessary...

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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.....^{19th}.....November 2014



Knowsley Council

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MR	
Name	KENNETH MORROW	
Job Title (if appropriate)	RETIRED ENGINEER	
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.

1. This proposal has been conducted with minimal exposure to people it affects. Much of the assumptions on population is flawed. More greenbelt is being released for development than is required. Larger population will be seeking employment out of the borough. Local infrastructure will not be adequate.
2. Levels of pollution including already high noise levels from two motorways, will impinge on quality of life.
3. Population figures from latest 2014 report must be addressed not the 2011 report total.
4. What are the traffic management upgrade proposals.
5. The Knowsley Council have not fully utilised available housing stock occupancy availability.
6. There are large areas of the Borough rated as 'brown field' that are still not developed.
7. Population densities are not validated as being accurate.

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. There are no specific plans detailing how increased traffic will be catered for. Knowsley residents travelling to Liverpool to work is already high (36%) this will increase. Junction (6M62) (1M57) gets gridlocked due to restricted traffic flows to and from Liverpool. Local roads usage high plus constant A/E demands on traffic to Whiston hospital. We need to see an infrastructure plan.
2. Green belt land is productive, derelict land is not. NPPF documents states brown site options should be prioritized
3. Quality of life will be degraded due to urban sprawl leisure sites are small in mainly inaccessible parts of Knowsley.
4. Knowsley has lost schools, libraries, based on data suggesting shrinking demographics. This is contrasting with data that says we need more land for housing. Where are the plans to replace these lost amenities. The new Whiston hospital has fewer beds than the site it replaced.
5. This looks like a political ploy to kick-start a new building industry.
6. No plans to protect biodiversity.

Continue on a separate sheet if necessary...

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5. If you are **objecting** or seeking a change to one of the modifications to the Core Strategy **and** there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

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Signature



Date 2-11-14



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	LINDA MORROW	
Job Title (if appropriate)	RETIRED LIBRARY ASST.	
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

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.

- IN WHISTON TOO LARGE AMOUNT OF GREEN BELT WHICH IS CURRENTLY BEING PRODUCTIVE IN FOOD SUPPLY WILL BE LOST FOR EVER. OUR QUALITY OF LIFE WILL BE NO DIFFERENT TO CITY DWELLERS, ONLY WITH POORER TRANSPORT LINKS.
 - MORE BROWN FIELD SITES AND UNOCCUPIED HOUSING SHOULD TAKE PRECEDENCE. THESE AREAS ALREADY HAVE INFRASTRUCTURES.
 - TRAFFIC LEVELS UNACCEPTABLY HIGH ON BASICALLY RURAL THOROUGHFARES. WINDY ARBOR ROAD HAS 2 BLIND BENDS THIS IS MAIN ACCESS TO M62-M57. CURRENT ROUNDABOUT SYSTEM IS FREQUENTLY GRIDLOCKED. THERE ARE SCANT REFERENCES TO TRAFFIC MANAGEMENT, EMPHASIS IS ON PRIVATE DEVELOPMENT
 - LOCAL EDUCATIONAL FACILITIES HAVE BEEN REDUCE DUE TO 'LACK OF DEMAND' NOW WE NEED ALL THESE DWELLINGS. PLANNING FOR THE FUTURE IS BASED ON FLAWED DATA.
 - WE MUST FOLLOW LATEST GUIDELINES WHEN DEALING WITH GREENBELT RELEASE 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.

- THE LOSS OF GREENBELT PUTS UK AGRO-BUSINESS UNDER MORE PRESSURE AND RAISING IMPORTS, THIS LAND IS PRODUCTIVE.
 - THE PARTS OF KNOWSLEY UNDER CONSIDERATION FOR EXPLOITATION ARE SEMI RURAL THIS WILL BE DOWNGRADED TO URBAN SPRAWL THERE TO FEW GREEN AREAS BETWEEN THE VARIOUS TOWNS IN THE AREA. BIODIVERSITY WILL CEASE TO BE RELEVANT
 - THIS PLAN WILL BRING IN A POPULATION FROM OUTSIDE THE BOROUGH WHO IN TURN WILL SEEK EMPLOYMENT OUT OF THE AREA. THIS WILL OVERLOAD AN ALREADY CREAKING ROAD SYSTEM.
 - MOTORWAY JUNCTIONS ARE NOT MENTIONED FOR UPGRADE MAKING IT DIFFICULT TO ACCESS THESE ROAD SYSTEMS.
 - COUNCIL MUST ADDRESS THE 35% UNDER OCCUPANCY OF ITS HOUSING STOCK, THERE SHOULD BE NO GHETTOS OF DERELICT PROPERTIES WHILE GREENBELT AREAS ARE DEVELOPED.
 - THE COUNCIL SHOULD FOLLOW THE LATEST GOVERNMENT GUIDELINES REGARDING GREENBELT DEVELOPMENT.
 - NEW TRAFFIC PLAN IS REQUIRED THAT IS SPECIFIC IN ITS OBJECTIVES.
- 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

11 / 11 / 14



From: Marilyn Roscoe [redacted]
Sent: 15 November 2014 18:35
To: [redacted]

Follow Up Flag: Follow up
Flag Status: Flagged

Save knowsley village green belt



Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form

Knowsley Council

RETURNING THIS FORM

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- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

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PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	MRS	
Name	Michelle Kelly	
Job Title (if appropriate)	Legal Secretary	
Organisation (if appropriate)	Liverpool City 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

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref Policy Ref Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|-------------------------------------|
| a) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

I object to this proposal being a local resident who already has to queue every morning at peak time to get onto the M57/M62 roundabout and back onto it every evening. If more houses are built the main Road, Windy Arbour will be totally congested at all times.

The land in question is a flood plain and green belt area. It would be therefore unsafe to build houses on a colluvial flood plain with inadequate drainage.

Continue on a separate sheet if necessary...

I object very strongly to this proposal.

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

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Signature 

Date 2-11-14

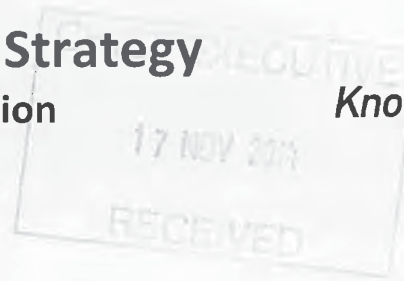


Knowsley Local Plan: Core Strategy

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	Neil	
Job Title (if appropriate)	Stone Mason	
Organisation (if appropriate)	Harrison Murrills	
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.

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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- b) Yes, I wish to participate at any further public hearing

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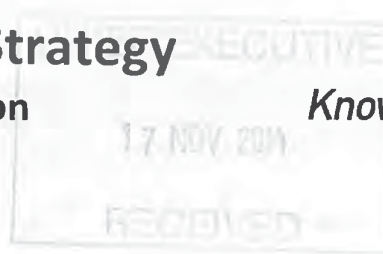
Signature _____ **Date** _____

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	PATRICIA STEWART	
Job Title (if appropriate)	RETIRED	
Organisation (if appropriate)		
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

PATRICIA STEWART, SAVE OUR GREENBELT

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

~~KG8514~~^{E2}

Policy Ref

KG8514

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 PROPOSED DEVELOPMENT WOULD CREATE MORE TRAFFIC AND HAVE A DETRIMENTAL EFFECT ON THE ENVIRONMENT, I.E WILDLIFE AND AIR POLLUTION CAUSED BY EXHAUST FUMES. THIS WOULD CAUSE HEALTH HAZARDS EXISTING ROADS ARE ALREADY VERY BUSY & EXTRA TRAFFIC WOULD CAUSE MORE CONGESTION + DIFFICULTY FOR PEDESTRIANS, PARTICULARLY THE DANGER TO CHILDREN CROSSING ROADS.

AN INCREASED POPULATION WOULD PUT AN ENORMOUS STRAIN ON LOCAL SERVICES, I.E DOCTORS' SURGERIES, SCHOOLS AND HOSPITALS, WHICH ARE ALREADY STRUGGLING TO COPE.

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.

PRESERVE THE LAST OF OUR GREEN BELT LAND
AND BUILD ELSEWHERE

Continue on a separate sheet if necessary...

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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	PAULA MANDEVILLE	
Job Title (if appropriate)	XXXXXXXXXX	
Organisation (if appropriate)	VILLAGE TRUST	STOCKBRIDGE VILLAGE
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 would like to lodge my objection to Proposed to the house development on WHISTON green belt. I moved to WHISTON some 9 yrs ago whiston was a lovely place at the time how things are changing

- ① TAX RANK
- ② CAR SALES
- ③ PURE TRAFFIC JAMS.

Now there are Plans to build on the only bit of (GREEN BELT) WHISTON has left
Can you Imagine the traffic up and down WINDY ARBOUR RD
It will be on Par with the M57 Pure Traffic
THEN you have the Schools Residents at whiston are going to have to fight for Places for there children these People have lived in whiston through (Generations) and now they have to face this.
we dont need this Development but its seems the Council do ~~Council~~ (Council Tax RATES)
it all about money and not Resident feelings. at whiston
we need to stop this Development and the Council need to listen

Continue on a separate sheet if necessary

LEAVE WHISTON GREEN BELT ALONE

4. If you are objecting to the modification please set out how you consider it should be changed to make 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 12-11-14.

LATE REPRESENTATION 023

[REDACTED]

From: Rachael King [REDACTED]
Sent: 14 November 2014 19:27
To: [REDACTED]
Subject: Fwd: Local Plan Core Strategy Modifications
Attachments: P1010281.JPG; P1010893.JPG; P1020091.JPG; P1000346.JPG

Follow Up Flag: Follow up
Flag Status: Flagged

----- Forwarded message -----

From: **Rachael King** [REDACTED]
Date: 13 November 2014 18:28
Subject: Local Plan Core Strategy Modifications
To: localplan@knowsley.gov.uk

Unfortunately i did try to send this before the date and time required as you can see above but there was a fault within my email which denied me from sending this.

I and my husband and family are apposed to the council's plan to change the green belt land that runs alongside Knowsley lane (hillside end and includes Knowsley lane farm to Stockbridge village) We have lived at [REDACTED] opposite Knowsley lane farm for 22 years, we chose to live here because of the views, trees,sunsets,sunrises, and wildlife that inhabit; rabbits,lapwings with there aerial displays,skylarks,foxes that visit our front garden,bats,that fly around our house, squirrels that visit our garden, hedgehogs, swifts and swallows, butterflies including the small tortoiseshell which is endangered, many different types of bees and lots of hedgerow birds not to mention plants, shrubs and very old trees. the green belt area gives us quality of life as if we lived in the countryside.

It will also devalue our property and cause in the future plans of sustainable urban extensions have more noise and traffic pollution, this would have a detrimental effect on us and our well being.

The farm and the housing a little further down the road have been here for many years and several of them are also listed houses as well. There is valuable agricultural land here on which horses graze all year through.

We have been lead to believed that knowsley council wanted to be noted for the green policy well lets have green and not brown.

We do not want the green belt land to change and we do not want anything to be built on this very special area.

Rachael King,Gary King,Daniel King,Jennifer King and Paul King
[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	MISS	
Name	SAMANTHA WOOD	
Job Title (if appropriate)	COLLEGE 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

SAMANTHA WOOD.

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

KGBS14

Policy Ref

E8

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've spent the last 31 years of my life living in Whiston or visiting my Parents who live in Foxshaw ~~Close~~. Over recent years the noise pollution from traffic has significantly increased and Whiston Village is heavily congested at peak times not to mention Tarbock Roundabout which is often gridlocked! However my main concern is the wildlife and beautiful countryside. A sea of concrete homes is going to destroy! Build on brownfield sites! For many years I've enjoyed family walks through the woods and big lake. The vast wildlife and countryside scenery is a haven away from busy traffic noise and fumes. My little boy now enjoys walking through the woods with grandad and Sandfield Nursery. Sandfield often plan trips to the woods and have an emphasis on learning outdoors. I feel it's vitally important for children to interact with nature and this beautiful environment as they learn so ^{much}. 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.

On his last visit to Halshead Park he told me they spoke to the farmer with his tractor who chatted with the children and explained how he was gathering his wheat crop for 'Daddy's Beer' and 'Mummy's Bread'... Such an invaluable lesson for 3 year olds! My mum and dad have a beautiful garden overlooking Big Lake and have frequent visits from woodpeckers, squirrels, birds of prey and collared doves. If the woods were destroyed these poor animals would die, as we are destroying their natural habitats. With rainforests being destroyed at an alarming rate we should be looking after our environment and protecting our trees. Without trees we do not have oxygen hence having a major impact on human life and the whole ecosystem. Have a conscience and stand up for saving our environment! 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 12.11.14.

From: Victoria Handley [REDACTED]
Sent: 14 November 2014 13:51
To: [REDACTED]
Subject: Knowsley Local Plan - Public Consultation - release of land from the Green Belt - East of Halewood

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs

Many thanks for the letter dated 19th September 14 in connection with the above.

I am resident at [REDACTED] I will be directly affected by the planned release of green belt land and construction of a substantial number of houses opposite and around my property.

I wish to raise objection to the planned release and construction of houses. I list my objections as follows

1. Government commitment to Green Belt

Communities Secretary Eric Pickles and Housing and Planning Minister Brandon Lewis said that thousands of brownfield sites are available for development, and should be prioritised. [New guidance](#), published on Monday 6 October, reaffirms how councils should use their [Local Plan](#), drawing on protections in the [National Planning Policy Framework](#), to safeguard their local area against urban sprawl, and protect the green lungs around towns and cities.

The guidance explains that, once established, green belt boundaries should only be altered in exceptional cases, through the preparation or review of the Local Plan.

It also states that housing need – including for traveller sites – does not justify the harm done to the green belt by inappropriate development. The measures (released on the 4th October 2014) will reinforce the action taken by the government since 2010 to protect the green belt. This includes:

- abolishing the previous administration’s top-down regional strategies
- selling surplus brownfield land for redevelopment
- introducing more flexible planning rights so empty and underused buildings can be brought back into productive use

Local Plans are now at the heart of the reformed, democratic planning system, so councils can decide where development should and shouldn’t go in consultation with local people. The Green belt around Halewood should be preserved to prevent the eventual sprawl to Widnes.

2. KEEP OUR VILLAGE A VILLAGE.

- a. What it would mean to the local community:
- The loss of a tremendous amount of Greenbelt and farmland.
 - The loss of wildlife in the woodlands.
 - The loss of valuable open spaces.
 - Disruption of pathways.

- Loss of natural break from the other nearby communities, creating an ugly urban sprawl.
 - An over capacity for local schools and doctors.
 - Heavy traffic on local roads which are not suitable for the amount of housing proposed. They are already heavily used and always in a poor state of repair.
 - More excessive housing would increase the carbon footprint.
3. The village would lose its heritage.
 4. There will be a significant loss of light and overshadowing from houses built directly opposite which is currently farm land.
 5. As a result of building on farm land directly across the road my property will be overlooking and I will have lost all of the current privacy
 6. Visual amenity is significantly impaired.
 7. Highway safety – there will be a significant increase in traffic leading to issues with highway safety
 8. Traffic generation – this will be substantial and through the village and next to 2 schools
 9. Noise and disturbance resulting from use – Lower Road is a quiet road. The additional housing, traffic and people would make the area into a noisy busy place to be.
 10. Loss of trees and lack of farmland which is currently farmed.
 11. The trees contain significant amounts of wildlife which will be lost if the plans go ahead
 12. Road access – such traffic volume will lead to traffic jams, traffic lights and roundabouts which will in turn lead to increased noise pollution and disturbance.
 13. Nature conservation – this should be at the heart of any council decision and the preservation of the green belt should be the primary concern.

These material considerations are relevant to this particular application and should be weighed in the final decision process according to their seriousness and relative importance.

I look forward to hearing from you.

Dr Victoria Handley

Director

Handley Law Limited



Social Media:   

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