

Knowsley Local Plan Core Strategy Examination

**Report of representations made:
Further Proposed Modification to
the Submission Document –
Wind Energy**

October 2015

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1. Introduction

- 1.1 This report sets out the representations received in response to an additional public consultation held to deal with a further Proposed Modification to the Knowsley Local Plan Core Strategy.
- 1.2 The further modification was proposed following the publication of a Written Ministerial Statement on Wind Energy in June 2015 and changes to national Planning Practice Guidance.
- 1.3 The Proposed Modification was published for consultation on 4 September 2015, and the consultation period ran until 2 October 2015.
- 1.4 All parties in the Core Strategy consultation database were notified directly (by letter or e-mail) of the arrangements for the consultation and the consultation was also advertised in the Liverpool Echo between 4 and 11 September 2015. Consultation documents were made available via the Council's website, and in libraries and One Stop Shops across the borough.
- 1.5 13 representations were received during the consultation period, and they are reproduced here. Personal details (including signatures, personal telephone numbers and private postal or email addresses) have been removed, although the names of respondents (and the organisations they represent, if applicable) are published.
- 1.6 Responses are ordered by a Representor ID number – this is consistent with previous consultations during preparation of the Knowsley Local Plan Core Strategy.

2. Representations Received

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3. Copies of representations



Marine
Management
Organisation

Rep ID 1

Lancaster House
Hampshire Court
Newcastle upon Tyne
NE4 7YH

T +44 (0)300 123 1032
F +44 (0)191 376 2605
www.gov.uk/mmo

By email:
localplan@knowsley.gov.uk

Our reference: 1213

28 September 2015

Dear Sir / Madam,

Re: Knowsley Local Plan – Public Consultation

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

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

Yours faithfully,

Adam Kennedy
Assurance Officer

Email: consultations@marinemanagement.org.uk



INVESTORS
IN PEOPLE

Date: 29 September 2015
Our ref: 164779

The logo for Natural England, featuring the words "NATURAL" and "ENGLAND" stacked vertically in a bold, sans-serif font. The text is white and set against a solid yellow rectangular background.

localplan@knowsley.gov.uk
BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Mr Barnes

Planning consultation: Further Modifications to the Knowsley Local Plan: Core Strategy

Thank you for consultation received on 4th September 2015.

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 does not have any comments to make on the Further Modifications to the Knowsley Local Plan: Core Strategy.

For any queries relating to the specific advice in this letter only please contact Kate Wheeler on 07769 918711. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Kate Wheeler
Cheshire, Greater Manchester, Merseyside and Lancashire Area



**The Coal
Authority**

Knowsley Local Plan Core Strategy - Further Proposed Modifications on Wind Energy (Consultation)

Consultation Deadline – 1 October 2015

Contact Details

Planning and Local Authority Liaison Department
The Coal Authority
200 Lichfield Lane
Berry Hill
MANSFIELD
Nottinghamshire
NG18 4RG

Planning Email: planningconsultation@coal.gov.uk
Planning Enquiries: 01623 637 119

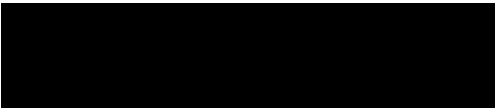
Date of Response
25 September 2015

Thank you for consulting The Coal Authority on the above document.

Having reviewed the document, I confirm that we have no specific comments to make at this stage.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).

Yours sincerely


Miss Rachael A. Bust *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MInstLM, MCMI, MRTPI*
Chief Planner / Principal Manager



Knowsley Council

Knowsley Local Plan: Core Strategy

Further Proposed Modification on Wind Energy Representations Form

ABOUT THIS CONSULTATION

This consultation relates to a further modification to the Knowsley Local Plan Core Strategy proposed in response to the publication of the Written Ministerial Statement on Local Planning in June 2015, in relation to Wind Energy. This involves a proposed modification to paragraph 9.17 of the Plan. **Representations will be accepted ONLY where they address this matter.** Please do not submit any representations on any other part of the Plan.

RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on 2 October 2015.** Forms received after this time can not be accepted.

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, Ground Floor, Yorkon Building, Archway Road, Liverpool, L36 9FB (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	ANN MURRAY	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address		KNOWSLEY M.B.C. 22 SEP 2015 BUILDING REGULATIONS
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact	By MAIL	

**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

Name and/or Organisation

1. Do you consider that the proposed modification to paragraph 9.17 of the Knowsley Local Plan Core Strategy 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"/> |

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

I think the bus men should put the bins in people's paths as when they are empty and we have a very windy day they can be blown into the road and cause accidents and why dont we put children in buses when they go to school and I think binzness should be made to pick up litter and then the Council workers could clean the roads cut the grass and pruned the trees

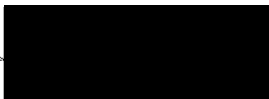
Continue on a separate sheet if necessary...

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

Signature



Date 20/9/2015

[REDACTED]

From: [REDACTED]
Sent: 01 October 2015 20:00
To: Knowsley Local Plan
Subject: Policy CS 23 Modifications

Dear Local Plan Team

Thank you for the opportunity to voice my opinion regarding the modifications to the KMBC Local Plan. I support the extra effort to be made by the council regarding planning permission for wind turbine applications in the borough.

Siting turbines where little or no energy would be generated is of no use to anyone. Local schemes supplying energy to those who have to view the turbines appear to be a great success in some countries and do not have the great numbers of individuals objecting to schemes. It is a great shame and very confusing that power generation as innocuous and comparatively easy to remove as wind turbines are, that they have been singled out for this treatment in the July ministerial statement, and fracking, nuclear and waste incineration have not.

Regards
Collette Milne

[REDACTED]



Local Plan Team
Knowsley MBC
Ground Floor
Yorkon Building
Archway Road
Liverpool
L36 9FB

Our ref: 1848

Your ref:

Date 21September
2015

localplan@knowsley.gov.uk

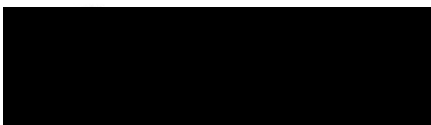
Dear Sir/Madam

Further Modifications to the Knowsley Local Plan: Sustainability Appraisal

Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

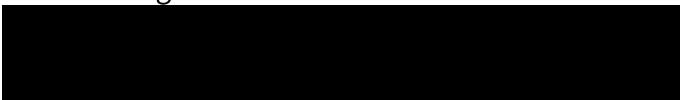
Yours sincerely,



Emily Hrycan

Historic Environment Planning Adviser (North West)

Historic England



[REDACTED]

From: Weightman, Heather
Sent: 01 October 2015 12:59
To: Knowsley Local Plan
Subject: Knowsley Local Plan - Public Consultation - Response - Knowsley Town Council

Dear Sirs,

Following a request for the views of members, please find below Knowsley Town Council's response to the proposed further modifications.

At a meeting of the Environment Committee of Knowsley Town Council, consideration was given to the further modifications to the Knowsley Local Plan: Core Strategy – relating to Wind Energy and it was resolved that the proposed modifications be noted.

Regards

[REDACTED]

Clerk of the Council
Knowsley Town Council

[REDACTED]



Knowsley Council

Knowsley Local Plan: Core Strategy

Further Proposed Modification on Wind Energy Representations Form

ABOUT THIS CONSULTATION

This consultation relates to a further modification to the Knowsley Local Plan Core Strategy proposed in response to the publication of the Written Ministerial Statement on Local Planning in June 2015, in relation to Wind Energy. This involves a proposed modification to paragraph 9.17 of the Plan. **Representations will be accepted ONLY where they address this matter.** Please do not submit any representations on any other part of the Plan.

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	DC	
Name	JOHN SILCS	
Job Title (if appropriate)		
Organisation (if appropriate)		
Postal Address	[REDACTED]	
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact	email	

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

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

PART B – YOUR REPRESENTATIONS

Name and/or Organisation

1. Do you consider that the proposed modification to paragraph 9.17 of the Knowsley Local Plan Core Strategy 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"/> |

2. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness 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...

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

WHILE IT SEEMS LEGALLY NECESSARY TO CONSIDER POSSIBLE WIND FARM SITES IN THE LOCAL PLAN, IT WOULD SEEM THAT THIS IS MERELY AN EXERCISE AS I WOULD COMMENT THAT THERE DOES NOT SEEM TO BE ANY CORROBORATED HIGH ENOUGH IN KNOWLEDGE FOR SUCH A DEVELOPMENT.

MORE PERTINENT IS THE QUESTION OF LARGE SOLAR ARRAYS - THESE CAN BE SEEN ON THE CONTINENTS AND CAN COVER LARGE AREAS OF LAND - THIS SHOULD BE CONSIDERED IN THE LOCAL PLAN

Continue on a separate sheet if necessary...

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

Signature



Date

23.11.13

[REDACTED]

From: [REDACTED]
Sent: 01 October 2015 11:50
To: Knowsley Local Plan
Subject: response to LDP

to KMBC/Mr Pike,we welcome consideration regrding alternative tech to counter the high levels of carcenogenic pollution we suffer in merseyside.the use if wind farms and reduction in chemical emissions and protection of our greenbelt are all vital to the defence of knowsleys environment and are not being respected by you. regards,j webster,roby residenrs action group.

[REDACTED]

From: [REDACTED]
Sent: 16 September 2015 09:35
To: Knowsley Local Plan
Cc: S WHITE; Fiona Whitfield
Subject: Re: Knowsley Local Plan - Public Consultation

Follow Up Flag: Follow up
Flag Status: Completed

Thank you for the consultation.

The Wildlife Trust for Lancashire, Manchester & North Merseyside has no comments to make on the further modification referred to in your email.

Mike Collier
Volunteer Planning Officer
Wildlife Trust for Lancashire, Manchester & North Merseyside
[REDACTED]

[REDACTED]

Sent: 04 September 2015 10:23
To: Knowsley Local Plan
Subject: Knowsley Local Plan - Public Consultation

Dear Sir/Madam,

Knowsley Local Plan – Public Consultation

I am writing to you because you have previously expressed an interest in the Knowsley Local Plan. Knowsley Council is holding a further public consultation on the Knowsley Local Plan Core Strategy and would welcome your views. Details of the consultation and how you may respond are set out below.

Further Modifications to the Knowsley Local Plan: Core Strategy

Knowsley Council submitted the **Knowsley Local Plan: Core Strategy** ('the Plan') to the Government in 2013. Planning Inspector Mr Martin Pike is undertaking an Examination in Public into the soundness and legal compliance of the Plan. Public hearing sessions were held in November 2013 and July 2014. In autumn 2014, the Council consulted on a range of proposed modifications to the Plan which had arisen as a result of the Examination process. Further public hearing sessions into these modifications were held in June 2015.

Following this, also in June 2015, the Secretary of State for Communities and Local Government issued Written Ministerial Statement on Local Planning, which introduced changes to national policy on wind energy. The Inspector has now advised the Council that the Plan will need to be modified to ensure that it reflects these changes.

Please be aware that this public consultation is limited to only this further modification which relates to wind energy. Consultation responses which relate to other parts of the Plan will not be accepted. Guidance notes and response forms are available to help you submit representations on the relevant

matter and in the correct format. All responses received will be publicly reported and submitted to the Inspector.

Viewing the consultation documents and submitting comments

Copies of documents related to this consultation can be viewed on the [Council's website](#) and at the locations specified in annex A to this email. All representations concerning the further **modification to the Core Strategy** must be received by the Council by **12 noon on 2 October 2015.**

All responses must be submitted by:

- e-mail to localplan@knowsley.gov.uk; and/or
- letter to Local Plan Team, Knowsley MBC, Ground Floor, Yorkon Building, Archway Road, Liverpool L36 9FB.

Further Information

Further information about the consultation can be obtained by telephoning 0151 443 2326 or by emailing localplan@knowsley.gov.uk. For information on the Knowsley Local Plan: Core Strategy Examination in Public, please contact the Programme Officer, Paul Morris by telephoning 0151 443 3077 or by emailing programmeofficer@knowsley.gov.uk.

If you do not wish to receive communications about the Knowsley Local Plan, please contact the Local Plan team (as above) and we will remove your details from our database.

Yours sincerely,

Stuart Barnes

Head of Planning
Knowsley Council

ANNEX A

VIEWING THE CONSULTATION DOCUMENTS

- Electronic copies of all documents related to these consultations, including guidance notes and response forms, will be available until the deadline for each consultation (as set out in the attached letter) on the [Council's website](#).
- Hard copies of relevant documents will be available until the deadline for each consultation (as set out in the attached letter) between 9:00am and 5:00pm (excluding weekends and bank holidays) at the Council's offices at:
 - Halewood One Stop Shop, The Halewood Centre, Roseheath Drive, Halewood, Knowsley, L26 9UH
 - Huyton One Stop Shop, Municipal Buildings, Archway Road, Huyton, Knowsley, L36 9UX
 - Kirkby One Stop Shop, The Kirkby Centre, Norwich Way, Kirkby, Knowsley, L32 8XY
 - Prescott One Stop Shop, Prescott Shopping Centre, Aspinnall Street, Prescott, Knowsley, L34 5GA
- You may also view the documents at Huyton, Halewood, Kirkby, Prescott and Stockbridge Village libraries (during normal opening hours as stated on the [Council's website](#)).

- All documents can be provided in alternative formats and languages on request to Knowsley Council on 0151 443 4031.

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29 September 2015
29th September 2015_ Representation on KBC Wind energy policy FINAL

Head of Planning
Knowsley Metropolitan Borough Council
Housing, Planning and Building Control
PO Box 26
Archway Road
Huyton
Knowsley
Merseyside
L36 9FB

David Palmer
E: dpalmer@savills.com
DL: +44 (0) 1202 856 868
F: +44 (0) 1202 856 801

Wessex House
Priors Walk
East Borough
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
savills.com

By Email

Dear Sir

ON BEHALF OF UNITED UTILITIES- REPRESENTATION FOR POLICY CS23 OF THE FURTHER PROPOSED MODIFICATION (SEPTEMBER 2015) KNOWSLEY LOCAL PLAN CORE STRATEGY

On behalf of United Utilities this letter constitutes a formal written representation in respect of the current consultation on the Proposed Modification to *Policy CS23* of the adopted Local Plan Core Strategy

The proposed further modification outlined by Knowsley Borough Council (the Council) is set out below:

9.17 Policy CS 23 will apply to all types of renewable and low carbon technology, with the exception of wind turbines. Policies relating to the development of wind turbines will be included within the Local Plan: Site Allocations and Development Policies document. Before adoption of that document, wind turbine proposals will be considered against relevant national policy including the Government's Written Ministerial Statement on this issue, made on 18 June 2015. The Written Ministerial Statement advises that local planning authorities should only grant planning permission for proposals including one or more wind turbines if: the proposed development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and, following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

The reason stated for the modification is to ensure that the Core Strategy accounts for the provisions of the Written Ministerial Statement on Wind Energy dated 18th June 2015. The contents of this statement are also reflected in the amendments made to the Renewable and Low Carbon Energy Planning Practice Guidance (PPG).

Response

We respectfully ask that the Council recognise that the purpose of the Written Ministerial Statement and amendments to the PPG are not to introduce new policy, but rather to explain how extant policy within the National Planning Policy Framework should be used in practice. This being the case, the Written Ministerial Statement and PPG should be subservient to the wording of the National Planning Policy Framework (NPPF), in particular paragraph 98 which states in part, that local planning authorities should approve renewable energy proposals 'if its impacts are (or can be made) acceptable'. Paragraph 98 goes on to state that 'local planning authorities should also expect subsequent applications for commercial scale projects

outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas'. Acknowledgement should also be made of the large body of national energy policy and the legal obligations to reduce greenhouse gas emissions imposed by the Climate Change Act. The Written Ministerial Statement and amendments to the PPG do nothing to amend this established law and policy or to lessen the weight that they carry.

In acknowledgment of these legal and material planning considerations we would suggest the following rewording of the proposed Policy CS 23 modification, recognising that the purpose of the development plan is not to replicate the wording of national planning policy:

9.17 Policy CS 23 will apply to all types of renewable and low carbon technology, with the exception of wind turbines. Policies relating to the development of wind turbines will be included within the Local Plan: Site Allocations and Development Policies document. Before adoption of that document, wind turbine proposals will be considered in accordance with legal and material planning considerations including relevant national planning policy as set out in the National Planning Policy Framework and Planning Practice Guidance.

Furthermore on behalf of United Utilities we respectfully ask that the Council in the production of the Local Plan: Site Allocations and Development Policies document, recognise the benefits of wind energy. These benefits include the reduction of carbon emissions, helping to reduce the effect of global warming and the provision of clean green renewable energy. These important benefits are inherently sustainable and therefore accord fully with the objectives of national planning policy.

The Council should also recognise the benefits that wind turbines can play in the provision of direct on-site energy generation for large energy users such as utility companies and other providers of essential infrastructure.

Yours sincerely

David Palmer
Associate Director

[REDACTED]

From: [REDACTED]
Sent: 05 September 2015 10:32
To: Knowsley Local Plan
Subject: Wind turbines in Knowsley village

Follow Up Flag: Follow up
Flag Status: Flagged

Looking at the preposed plans to erect wind turbines in a place which is flat not a particularly windy place and not an open place to me seem a pure waist of time and money unless they can produce their own wind also me john Gibson

Sent from my iPhone