

KNOWSLEY LOCAL PLAN: CORE STRATEGY

KNOWSLEY METROPOLITAN BOROUGH COUNCIL

HEARING STATEMENT 14

MATTER 2: LEGAL COMPLIANCE AND PROCEDURAL MATTERS

2.1 *Is the Knowsley Local Plan: Core Strategy (KLPCS) in general accordance with the Statement of Community Involvement? Has the KLPCS emerged from an open and transparent process that demonstrates how and why the preferred strategy was selected, in consultation with the public and other stakeholders?*

2.1.1 The Council has undertaken a series of wide ranging and comprehensive consultation exercises in preparing the Knowsley Local Plan Core Strategy (KLPCS). The Council's evidence relating to how these exercises were undertaken is summarised in earlier documents, most notably its:

- Statement on Matter 1 "Legal Compliance and Procedural Matters" to the November, 2013 hearings (CH01); and
- "Note on Previous Consultation Stages", January 2015 (EX37).

2.1.2 Further details of how the Council undertook these extensive consultation exercises at previous stages in preparing the KLPCS and the responses arising from them are contained within the following documentation:

- Reports of Consultation at the "Issues and Options" and "Preferred Options" stages, published in 2010 and 2011 respectively (SD04, SD05 and SD05A);
- Statement of Previous Consultation, which summarises the consultation undertaken by the Council up to submission of the KLPCS to the Government in July 2013 (SD01); and
- Report of Consultation and Report of Representations at the Proposed Modifications stage in 2014 (SD33 and SD34a-h).

2.1.3 Paragraphs 1.2.1 to 1.2.11 of the Council's Statement on Matter 1 "Legal Compliance and Procedural Matters" to the November 2013 hearings (CH01) explains how the Council has complied with the consultation requirements contained within relevant legislation, including the requirement to comply with its own adopted Statement of Community Involvement (PP15) at all stages in preparing the KLPCS.

2.1.4 Although a significant response was received from the public at earlier stages (most notably at Preferred Options stage in 2011), the Council's consultation on Proposed Modifications to the KLPCS (autumn 2014) gave rise to a larger response than had been experienced during any previous stage. The increased level of response related particularly to the Proposed Modifications which identified and allocated the proposed Sustainable Urban Extensions

(SUEs), to be released from the Green Belt for housing or in some cases employment development.

2.1.5 The increased response at Proposed Modifications stage included responses from a number of representors who stated that they had been unaware previously of the proposals to release Green Belt land for development. The Inspector's note to the Council concerning procedural matters, issued in December 2014 (EX35) responded to this issue by asking the Council to answer a number of questions relating to the consultation exercises which it had undertaken in preparing the Plan.

2.1.6 The Council's "Note on Previous Consultation Stages" (EX37) was prepared in response to the Inspector's note and contains:

- An overview of the previous consultation processes;
- Details of how and to whom (in general terms) documents had been distributed, particularly at Proposed Submission and Proposed Modifications stages; and
- Potential reasons why the consultation response was greater at Proposed Modifications stage than at earlier stages in this process.

2.1.7 Section 7 and Tables G1 and G2 in Annex G to the Council's "Note on Previous Consultation Stages" (EX37) compare the consultation methods which the Council used at each stage in preparing the KLPCS with what is required by relevant regulations and its Statement of Community Involvement. Tables G1 and G2 split the requirements of the regulations and the Statement of Community Involvement into the various stages of the KLPCS to which each requirement applies. They therefore identify what consultation activities the Council had to undertake at:

- Early engagement;
- Issues and Options;
- Preferred Options; and
- Proposed Submission stages.

The requirements listed in Table G2 are derived mainly from Table 7.1 on page 21 of the Statement of Community Involvement (PP15).

2.1.8 Comparison of the consultation which was undertaken by the Council with what was actually required by the Statement of Community Involvement, as set out in Annex G of the Council's "Note on Previous Consultation Stages" 2015 (EX37), clearly demonstrates that the Council has met (and in some respects exceeded) the requirements of the Statement of Community Involvement in preparing the KLPCS. The analysis in Annex G also clearly demonstrates that all the requirements contained within the relevant regulations have been met.

2.1.9 Paragraphs 1.3.1 to 1.3.6 of the Council's statement on matter 1 "Legal Compliance and Procedural Matters", November 2013 (CH01) explains how the KLPCS has emerged from an open and transparent process that

demonstrated how and why the preferred strategy was selected in consultation with the public and other stakeholders. The information in that statement remains valid for all stages in the Plan preparation process up to the date of those hearings i.e. November 2013.

2.1.10 The subsequent Proposed Modifications stage included a further wide ranging and comprehensive consultation exercise. The wide variety of methods used in this further consultation exercise and the feedback received are set out in the Council's Report of Consultation and Report of Representations at the Proposed Modifications stage (SD33 and SD34a-h).

2.1.11 In addition the Council's "Accounting for Proposed Modifications Representations" document (SD35) sets out a detailed analysis of the matters raised by respondents to the Proposed Modifications consultation and will help to inform the debate on the matters that the Inspector has identified for further discussion at the re-convened hearings in June 2015.

2.1.12 For all the reasons which are summarised above and set out in further detail in the other documents referred to (particularly documents CH01 and EX37) it has been clearly established that the KLPCS has:

- Been prepared in accordance with the Statement of Community Involvement; and
- Emerged from an open and transparent process that demonstrates how and why the preferred strategy was selected, in consultation with the public and other stakeholders.