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Mr Edward Bean
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Date: 13 May 2015

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Dear Mr Morris

**Re; Knowsley Local Plan: Core Strategy Examination
Reconvened Examination Hearings – June 2015 Document EX39 & EX40**

This submission relates to land at Shrogs Farm Kirkby.
It can be confirmed that the land does not apply to the criteria in part 3 of Document EX39 under "New representors." I would refer these comments in response to **Question 2 – 2.1** in document EX40.

*The Inspector asks "Is the Knowsley Local Plan: Core Strategy in general accordance with the Statement of Community Involvement?
And has it 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?"*

I would direct the Inspector to my response to the Core Strategy Proposed Submission Document Dated 08/11/ 2012 to 21/12/2012 Comment ID PS8. This may assist in addressing the question on openness and transparency.

On page 3, paragraph 3, line 12, of the sub text this sets out evidence that land at Shrogs Farm was not properly assessed by the authors of the Joint Employment Land and Premises Study in 2009 (JEL&PS) and was discarded as a development opportunity on the basis of the land study.

This part of the consultation with community involvement does not appear follow a transparent process as measured in question 2.1. in Document EX40

I would invite the Inspector to consider that the councils action in approving planning consent to build 300 plus- houses inside the Green Belt at Bank Lane, Kirkby in 2014. This could be dealt with in question 5 of Document EX39 on *" new matters that may have arisen since the hearings were adjourned in July 2014"*.

This plan was considered against Policy CP 2: and Policy G1: of the Knowsley Replacement Unitary Development Plan, June 2006.
The primary objective of the Policy CP2 para (1.) *"is to preserve the openness and character of areas designated as Green Belt, and para (3) Development*

that would damage the above assets will only be permitted in exceptional circumstances"

Given that the Council launched a "population strategy" that saw a 20 year non- stop house building in areas of the borough more housebuilding in the Green Belt would unlikely to meet the criteria "as exceptional circumstances"

There appears to be no evidence of an impact appraisal on effect of the house building programme around road infrastructure, service demands, and diminishing open spaces, that would justify the "exceptional circumstances" argument to build in the Green Belt which has now been established by the encroachment into the Green Belt land at Bank Lane, Kirkby.

This decision by the Council contrasts with their approach to my land at Shrogs Farm. The JEL&PS Study in 2009 stated the land was in the Green Belt.

The Council then created confusion by their Core Strategy Green Belt Technical Report Submission Version July 2013, on Shrogs Farm it states "*it is not related to he existing Green Belt boundary therefore no assessment can be made "*

if the land is not part of the Green Belt how can the Council argue it is part of an essential – gap, whilst successfully promoting development in the Green Belt at Bank Lane, Kirkby that was also part of an essential -gap.?

The Council appear to be applying inconsistency on policy interpretation during the progression of the Core Strategy that is not open, transparent or even-handed.

There is evidence that the Councils approach on how they assessed the land at Shrogs Farm was flawed and I would invite the Inspector to consider this submission and references and apply consistency and openness the on the policy designation of my land within the Knowsley Local Plan Core Strategy.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'E Bean', written in a cursive style.

Edward Bean