

Comments on Sefton Council’s “preferred Option” for the Core Strategy

Introduction

These observations are submitted by the CPRE (Campaign to Protect Rural England) Sefton District Group. The Sefton group is affiliated to the Lancashire Branch of CPRE. The Branch has a membership of over 700 individual and 78 town and parish councils.

CPRE campaigns for a sustainable future for the English countryside. It highlights threats and promotes positive solutions seeking to influence public opinion and decision makers at every level. CPRE has supporting network with over 200 active district groups, a branch in every county, a group in every region and a national office providing us with a powerful combination of effective local action and strong national campaigning.

Our observations in this submission focus on the three Options for how much land will be needed for new homes and jobs up to 2028, and not on the Green Belt or Green Space Studies.

We are critical of the procedure that has been followed in the Options Paper consultation. In our view, were Option 1 to become the foundation of the Core Strategy, the Green Belt Study would be irrelevant and so not a matter for consultation. Only if Option 2 or Option 3 were to be adopted, would the Green Belt Study Findings be relevant and the consultation thereon be justified. However, notwithstanding, we have carefully considered the Green Belt Study Findings and have reviewed every parcel of Green Belt land assessed in the Study; we shall be communicating our comments on selected parcels as soon as we can complete our analysis.

We are conscious of the importance of adopting a local Core Strategy/Local Plan before the adoption of the National Planning Policy Framework (NPPF)¹.

Key messages

The Council should not ignore the overwhelming wishes of the electorate as articulated in all the public meetings and media cover during the consultation. This has indicated that there is a distinct lack of support for any development on the Green Belt. CPRE Sefton interprets this as evidence that the general public values the quality of life and sense of place as being of crucial importance.

We reject the assumption that the Borough’s economic growth is inextricably linked with the greater amount of land that is available for new homes, CPRE Sefton believes that the environmental and social needs of its residents are equally important as economic wellbeing.

In the light of the significantly changed economic climate, the different economic forecast and the radical slowdown in the housing market, **CPRE Sefton does not at this stage support any of the three options.**

We recognise however that the Core Strategy must be sufficiently robust to avoid, as far as possible, the risk of being thrown out by the Government at the enquiry stage.

We recommend that Sefton undertakes using new census data **a rigorous re-examination of the number of new homes** that are estimated to be needed each year to 2028.

In re assessing the need for new homes the figure should be broken down into

¹ Although we note that the draft NPPF is now a material consideration and are aware that the Council has to comply with it in producing their Core Strategy

- The need for social housing
- The need for housing that is affordable to first time buyers
- The need for well designed smaller property for people living in property that is larger than needed
- But should exclude the need for new housing for people who wish to move up the housing chain

The defined figure of housing need should be reviewed and updated on a regular basis, we recommend that the Core Strategy has flexibility built in. The figure should respond to reality and be capable of changing from the initial predicted figure.

In addition to our proposal for a re examination of housing need:

We recommend that even though the Government has removed the requirement, **Sefton should re-establish its own target for the development of brown field** sites especially due to the land constraints within Sefton Borough.

We urge that the **Core Strategy states that priority and support will be given to the redevelopment of empty property by bringing long unoccupied houses into beneficial occupation.**

We note that the draft NPPF states that Local Planning Authorities should identify and bring back in to residential use empty housing and buildings in line with [their] local housing and empty homes strategies and where appropriate acquire properties under their compulsory purchase powers. We therefore urge **Sefton to review its current Empty Properties Strategy.**

We urge that **higher priority should be given to refurbishment of property that has been declared obsolete** but has yet to be demolished as a result of the now defunct Housing Market Renewal programme.

We urge that **Sefton re-examines any industrial sites** that have been vacant for at least ten years, and considers redefining some for housing development.

We urge that that the Core Strategy should **specify minimum standards of construction**, with higher accommodation standards and of better external amenity space for new homes. We believe that older people would then find that smaller accommodation would be more attractive and better meet their needs.

We urge that the Core Strategy states that there should be **no re-development and change of use from food production on any grade 1 or 2 agricultural land²**

We urge that the Core Strategy states that **no Green Belt land will³ be released before all alternatives have been exhausted**

We advocate that **if Green belt land has ever to be released any decisions are measured** against the original core purposes for the creation of Green Belts⁴:

We urge that the Core Strategy should ensure that the **planning committee preserves full control over any inappropriate planning application on Green Belt**

² In the past 20 years, the amount of arable land in the United Kingdom has decreased by 30% and food imports have increased by 47%. National only 2.7% of land is classified as grade 1 and only 14.2% as grade 2. To lose any more of this land would in our view be not only highly unwise but also very short sighted. We believe that there is now general agreement that national food production has to increase and in particular there has to be more *local* food production.

³ We accept that the NPPF requires the re-designation of Green Belt boundaries at the Local Plan production stage.

⁴ The purpose of creating of Green Belts is *-To prevent neighbouring towns from merging into one another - To assist in safeguarding the countryside from encroachment -To preserve the setting and special character of historic towns -To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. -*