

Paul,

My comments relate in some part to all questions listed below, I realise we are going over old ground in some cases, but the Government is shifting its stance on Green Belt in the light of unfavourable public opinion.

Questions and comments in red below:

1.1 What are the implications of the new population projections for the objectively assessed need for housing in Knowsley borough?

"I note that the new population forecasts for Knowsley are lower than previously reported. Given that the amount of housing that can be accommodated on the Green Belt land, proposed for release, is far in excess of the housing target, surely the council should re-consider the guidance within the NPPF."

According to the NPPF, there are five stated purposes of including land within the green belt, please note my comments relative to the latest information:

- To check the unrestricted sprawl of large built-up areas – relevant to Whiston
- To prevent neighbouring towns from merging into one another – relevant to Whiston in relation to Halton and St Helens
- 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. – Relevant to Knowsley

Once an area of land has been defined as green belt, the stated opportunities and benefits include:

- Providing opportunities for access to the open countryside for the urban population– relevant to Whiston
- Providing opportunities for outdoor sport and outdoor recreation near urban areas– relevant to Whiston
- The retention of attractive landscapes and the enhancement of landscapes, near to where people live– relevant to Whiston
- Improvement of damaged and derelict land around towns
- The securing of nature conservation interests– relevant to Whiston
- The retention of land in agricultural, forestry and related uses. – relevant to Whiston

1.2 What are the implications of the use of market signals (house prices, rents, affordability, rate of development and overcrowding) for the assessment of housing need? Does information on changes in market signals over time reveal any imbalances between the demand for and supply of housing which are not already addressed in the KLPCS?

“The Housing shortage is not in the North West, recent figures show that apart from London and the South East, prices are falling in most of the rest of the country.”

1.4 In light of the new information, what is the robust figure for the supply of employment land?

2.8 Is the approach to development of land South of Whiston for housing and South of M62 for Use Class B8 employment (new policy SUE 2c) appropriate?

“I would also suggest, that under the duty to co-operate Brownfield land, empty housing and other spare capacity in Liverpool, St Helens and Halton could accommodate some of Knowsley's requirements and that the recent massive expansion in new building within Halton and St Helens almost to the border of Whiston could also be considered.”

“Surely this would be a preferred alternative to building on Agricultural land as any population forecast must take into account the ability to feed that population?”

1.5 Does the identified land supply pay sufficient regard to the needs of different market sectors?

1.6 Are there any other new matters relevant to the KLPCS?

2.1 Is the designation of 'reserve locations' as Sustainable Urban Extensions and the omission of a phased approach to their release (new policy SUE 1) justified by evidence?

“I would suggest that any proposed Green Belt release is put on hold until a sub-regional assessment of the Merseyside Green Belt, and a sub-regional assessment of housing capacity has been looked at.”

2.11 What are the implications of the affordable housing changes for the KLPCS objective of re-balancing the housing market?

2.12 Do the modifications proposed to policy CS22 fully take into account the Government's latest thinking on the approach to sustainable construction?

"I have noted recent comments by the Rt Hon Eric Pickles, The Secretary of State for Communities and Local Government, where he has restated the need for Councils to use brown field sites before considering the release of Green Belt, especially Agricultural land as that to the South of Whiston. "

Kind Regards

Ray Davis
Whiston Green Belt Action Group