

Supplementary statement of Peter Neild.

1. At a previous hearing Mr Pike agreed with my suggestion that Sefton Council should provide an up to date list of brownfield sites. On 14 December I received a copy of the NULD sites analysis and this has been since added to the Examination Library at EX 26.
2. At this late stage I am not in a position to carry out a detailed examination of the schedules so I am unable to challenge the information now provided in place of my earlier schedules, which showed a total of 232 brownfield sites (352 ha.). They were based mainly on the last NLUD returns in 2010.
3. I refer to the summary analysis of brownfield sites and in my submission the relevant categories in respect of housing allocation are as follows:

Category	No. of sites	Total area (ha.)
Housing allocations in the Local Plan	23	103.16
Sites in the SHLAA supply	105	77.41
Potential additional sites	2	0.13
Totals	130	180.7

This revised total still represents a significant amount of brownfield housing land throughout Sefton and I would suggest that additional windfalls should also be taken into account. I also calculate from the analysis there are a further 6 sites (total 26.31 ha.) that are described as Local Plan Employment Allocation. I also suggest these sites should be considered before any relevant parts of Green Belt land.

4. In my opinion the availability of such sites should have been considered before any incursion into the Green Belt was put forward in the Local Plan. This is in accordance with the Core Planning Principles in para. 17 of the National Policy Framework (NPPF 2012). These include protecting the Green Belts around urban areas and encouraging the effective use of brownfield land. At present there is a consultation on possible amendments to the NPPF and at para. 21 it states: "We have already made clear our policy for ensuring as much use as possible of brownfield land in driving up housing supply." It seems that government policy has not changed and indeed seems to emphasise the requirement to make best use of brownfield sites.
5. I contend that Sefton's approach to the provision of land to meet housing need has been seriously flawed from the outset. It has been to concentrate on Green Belt sites before giving proper consideration to existing brownfield sites. The scene was set by Councillor Peter Dowd when he is quoted as saying: "one of the myths is that we have more brownfield sites available, I keep on saying to people 'you tell me where they are.' [Liverpool Echo, 8 January 2015].

The word 'more' implies that he was aware of brownfield sites available. The 2010 NULD would have been a starting point, albeit some entries may have been out of date. I only discovered their existence by accident and it was not until some 11 months after the press statement, near the final stages of this Inquiry, that a proper analysis of those sites was provided.

6. What can be done to try and rectify this problem? It is clear that the brownfield sites will not meet all the predicted housing need. But I suggest that the totality of brownfield sites plus some allowance for future windfalls could meet about half of this need. One has to concede, albeit reluctantly, that some of the need may have to be met by encroaching on Green Belt land. If so, which sites could be utilised without causing serious environmental damage and without incurring serious infrastructure issues? It will come as no surprise to anyone that Land East of Maghull would come at the top of my list!
7. It may be argued that my suggested approach is not scientific. What I am suggesting is perhaps a rough and ready approach to the present situation. Housing need and possible solutions are not an exact science and are based on future predictions. How can we predict the possible consequences of climate change? Who would have predicted the recent severe flooding in Cumbria?