

ST HELENS BOROUGH LOCAL PLAN 2020—2035 EXAMINATION

Agenda
Session 3 – 09.30 Thursday 27 May 2021
Matter 3
Spatial Strategy and Strategic Policies

The matter considers whether the spatial strategy is justified and whether related strategic policies are positively prepared, effective, and consistent with national policy.

Specific sites will be discussed during Week 2 of the hearings.

Policies to be covered by Matter 3: LPA01, LPA02, LPA03, LPA05 (Section 3), LPA06, LPA09

Main Evidence Base

SD025 - Housing Need and Supply Background Paper

SD026 – Developing the Strategy Background Paper

SD020 – Green Belt Review 2018

GRE001 - St Helens Local Plan Draft Green Belt Review 2016

SHBC001 – Council response to Inspector’s preliminary questions

SHBC010 - St Helens Local Plan Draft Schedule of Modifications

Examination library link:

<https://www.sthelens.gov.uk/planning-building-control/planning-policy/local-plan/local-plan-examination-library/>

Participants

Please refer to the latest Hearings Programme (INSP009B)

Statements

St Helens Borough Council

Taylor Wimpey UK Ltd

Wainhomes

Home Builders Federation

Redrow Homes NW

Steve Muskett

Persimmon Homes

Church Commissioners for England

Eccleston Homes

Homes England

Jones Homes (NW) Ltd

Redrow Homes Ltd

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Story Homes
Barratt Homes
Andrew Cotton
Omega St Helens Ltd
Mr A Jones
Lovell Partnership Ltd
Tritax Symmetry
Wallace Land Investments
Parkside Regeneration LLP
Miller Homes
Peel L & P
Murphy Group
CPRE

Introduction to the hearing session

Issue 1: Previously developed land and housing densities

Policy LPA02 refers to the re-use of previously developed land in key settlements being a key priority. Section 11 of the Framework refers to making effective use of land.

- 1. Is there any inconsistency between LPA02 and the Framework in relation to its approach to brownfield land?*

The Council's statement draws particular attention to the provisions of paragraphs 118 c) and 119 of the Framework.

- 1a. Are the provisions of Section 3 of Policy LPA02 (potential for lower thresholds for developer contributions on brownfield land) justified and consistent with national policy?*

Section 3 of Policy LPA05 sets out the densities that housing development should aim to achieve depending on where the site is located. In response to preliminary questions the Council has suggested a MM to the policy (SHBC001 – PQ44)¹.

- 2. Would Section 3 of Policy LPA05 ensure that optimal use is made of sites as set out in paragraph 123 of the Framework?*
 - 2a. Should that part of Section 3 that refers to densities of less than 30 dph be more positively expressed, including to allow the development of larger family homes?*

¹ By deleting Section 3 c) of Policy LPA05

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2b. Should the densities in Section 3 (and Table 4.5) be set as guidance rather than as a policy requirement?

Issue 2: Green Belt and Exceptional Circumstances

(Green Belt alterations will also be discussed in relation to specific allocations during Week 2)

The Framework requires that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The Council, in seeking to meet its housing and employment needs, suggest that sites on the edge of settlements which are currently Green Belt, are required. In proposing such release, the Council suggests that there are insufficient sites within built-up areas

3. Does the presence of Green Belt provide a reason for restricting the overall scale of development proposed by the Plan (paragraph 11. b) i of the Framework)?

The Council notes the provisions of paragraph 11 of the Framework, the characteristics of neighbouring authorities (including the presence of Green Belt) and that Green Belt does not justify restricting the overall scale of development.

4. Have, in principle, exceptional circumstances been demonstrated for the alteration of Green Belt boundaries?

The Council considers that its robust development requirements and specific development needs (e.g. large-scale storage and distribution uses) cannot be met without releasing land from the Green Belt.

5. On the assumption that the housing and employment requirements are justified, has the quantum of Green Belt release been supported by proportionate evidence? For example, has effective use of sites in the built-up areas and brownfield land been fully explored, including optimising the use of such land?

The Council considers that it is not realistic to substantially increase the urban land supply without causing harm to infrastructure provision, loss of recreational land and changes to the character of the built environment. The Council also point to issues with deliverability of urban land, particularly through high density schemes. As indicated above the Council also notes that large-scale storage and distribution uses and the Strategic Rail Freight Interchange have specific requirements which could not be met within the urban area.

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6. *On a Boroughwide level is the methodology for Green Belt assessment robust and reasonably consistent with that used by adjoining authorities?*

6a. *Has the Green Belt assessment been unacceptably conflated with other considerations such as constraints, sustainability and other suitability/deliverability criteria?*

The Council sets out its staged approach to Green Belt assessment, the consultation undertaken, and its view that the methodology has been reasonably consistent with other nearby authorities/best practice.

Issue 3: The principle of safeguarded land being identified to meet longer-term development needs

(Green Belt alterations will be discussed in relation to specific areas of Safeguarded Land during Week 2)

The Plan proposes removal of land from the Green Belt to provide safeguarded land to meet longer term housing and employment needs (paragraph 139 of the Framework refers). In response to preliminary questions the Council has sought to explain how the quantum of safeguarded land has been determined (SHBC – PQ45).

7. *Are the proposals to identify safeguarded land between the urban area and the Green Belt justified to meet longer-term development needs?*

In summary the Council's position is that it is unlikely that future needs beyond the current plan period will be met without requiring Green Belt release. Therefore, to not identify safeguarded land in this Plan would likely result in the need to alter the Green Belt boundaries again at the end of the Plan period, contrary to the Framework.

8. *Has enough or too much land been proposed for safeguarding to meet longer-term development needs?*

The Council make reference to its response in SHBC001 (PQ45). The safeguarded land would provide around 5-6 years supply of housing land (based on the LP requirement) and some 85 ha of employment land which the Council considers is a balanced approach. Alternative suggestions are that the amount of safeguarded land should be sufficient to meet the needs of another full plan period e.g. up to 2052.

9. *In general terms is the safeguarded land in the right place to meet longer-term development needs?*

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The Council notes the location of safeguarded employment land in relation to Omega and employment development at Haydock. In terms of housing sites, the Council points to the site selection process (SA and Green Belt review) and the reasonable geographical spread through the Borough. Others argue that no safeguarded land is identified in some key settlements to meet longer-term housing needs e.g. Rainford, Rainhill, Billinge, Blackbrook & Haydock.

10. Are the terms of Policy LPA06, particularly in relation to the release of safeguarded land, consistent with national policy?

The Council suggests that the terms of the policy are consistent with paragraph 139 of the Framework.

10a. Is there a need for more specific triggers for the updating of the Plan to be included within Policy LPA06, noting the provisions of paragraph 33 of the Framework?

Issue 4: Compensatory improvements to Green Belt land

Paragraph 138 of the Framework requires that Plans set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements. In response to preliminary questions the Council has sought to explain how the Plan will deliver these improvements (SHBC – PQ47).

11. Taking into account the Council's initial response, is the Plan clear on how it would intend to deliver compensatory improvements?

The Council points to policies of the Plan which should be able to achieve compensatory improvements, including in particular those which relate to Bold Forest Park, but acknowledge that a specific reference to sites being required to compensate for the loss of Green Belt would be helpful.

12. On the assumption that the Plan's policies should set out ways that such compensatory improvements would be achieved, what modifications would be necessary?

The Council suggest that Policy LPA09 and/or site profiles could be modified to make specific reference to compensatory improvements. This would require Main Modification(s).

12a. How would compensatory improvements be achieved for employment allocations requiring the release of Green Belt land?

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12b. In addition to Policy LPA09, would modifications to Policies LPA04.1 and LPA05.1 also be necessary to ensure compensatory improvements were achieved?

Issue 5: The spatial distribution

Policy LPA02 identifies a number of key settlements for the focusing of regeneration and growth. However, concerns have been expressed that the distribution of development through allocations does not reflect the size and sustainability of settlements or that allocations are on the periphery of these key settlements.

13. Is the spatial distribution of development within the Plan justified?

The Council points to the identification of sites in sustainable locations, including within the urban area where possible, but also the limitations in terms of sites for large scale storage and distribution. There is further explanation in SD026. Others argue that limited land is identified in some key settlements to meet housing needs e.g. Rainford, Rainhill, Billinge, Haydock/Blackbrook.

13a. Should Policy LPA02 set out a settlement hierarchy so that 'an appropriate strategy' is clearly justified?

14. Has the spatial distribution had regard to the impacts on climate change, including CO2 emissions?

The Council notes that Appendix 3 to the SA considers the impacts of climate change and the various distribution options, including the possibility of a new settlement. Others argue that the spatial distribution has not sufficiently taken into account factors such as the location of public transport hubs (paragraph 102 of the Framework refers).

Issue 6: Site Selection

Paragraph 4.6.10 of the Plan summarises the approach to the selection of sites to be removed from the Green Belt to meet development needs. The GB assessments referred to under Issue 2 are an important part of this process but other factors such as accessibility, infrastructure and deliverability have been taken into account (see also paragraphs 6.24 – 6.28 of SD026 and SD020).

14. Taking into account the range of factors considered in site selection, has the Council's approach been robust, positive and justified?

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The Council refers to the SHLAA process, particularly in respect of urban land supply, and the Green Belt Review in respect of sites outside the urban area. Further detail is provided in SD026, SD025 and SD020.

Issue 7: Policies LPA03 and LPA01

Policy LPA03 sets out development principles that form the basis for more detailed policies of the Plan.

15. Is Policy LPA03 consistent with national policy and effective?

15a. Are the provisions of Section 8 of Policy LPA03 (relating to carbon footprint and climate change) positively prepared, justified and consistent with national policy?

The Council considers that each criterion of Policy LPA03 relates to an important component of the Framework and supports the delivery of key themes which national policy aims to address.

Policy LPA01 (Presumption in Favour of Sustainable Development) seeks to replicate paragraph 11 of the Framework. However, the PPG advises that 'there is no need for a plan to directly replicate the wording in paragraph 11 in a policy'. The Council has agreed to delete the policy. However, it is noted that some representors support the policy.

17. Is Policy LPA01 necessary for the soundness of the Plan?

Actions arising from the hearing session