

## **Matter 3: Spatial Strategy and Strategic Policies**

### **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 HBF does not wish to respond to this question at this time.

*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).*

#### **2. Would Section 3 of Policy LPA05 ensure that optimal use is made of sites as set out in paragraph 123 of the Framework?**

Section 3 of Policy LPA05 looks for new development to achieve a minimum density of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30dph on sites in local centres, sites that are well served by bus or train services and in other urban areas. It goes on to state that densities of less than 30dph will only be appropriate where they are necessary to achieve a clear planning objective such as avoiding harm to the character or appearance of the area.

The HBF considers that this part of the policy should help to ensure that optimal use is made of site. But that it would benefit from an element of flexibility allowing developers to take into account local and site characteristics, market aspirations and viability in determining the appropriate density of the site.

The HBF considers that the policy should be modified as follows in order to make the document sound:

~~*'Densities of less than 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of the area*~~

***Densities below those set out above may be considered appropriate where local variations in housing need, local characteristics, site-specific circumstances or scheme viability indicate a different density is required in order to achieve local plan objectives'***

### **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 HBF does not consider that the presence of Green Belt is sufficient reason for restricting the overall scale of development, particularly when the scale of Green Belt in the area is considered and the limited availability of alternative sites is considered either within St Helens or other authorities in the housing market area.

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

The Council has identified that there is a shortfall of suitable land within its existing urban areas, and in urban areas of nearby authorities, to meet these needs. Therefore, the Council considers it has been necessary to review the Green Belt in the Borough. The HBF considers that the need to plan for housing and employment growth can be an exceptional circumstance in relation to Green Belt release.

**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 HBF considers that this is a question for the Council to answer.

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

The HBF does not wish to respond to this question at this time.