

Matter 3 Spatial Strategy and Strategic Policies

Issues:

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?

Previously CPRE commented that the use of “as far as practical” makes this policy in practice difficult to interpret and renders the local plan policy difficult to implement.

There is not a definition for sustainable development in the NPPF and therefore we suggest inclusion of a definition, we recommend the Brundtland definition “development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”

CPRE would like to see employment and housing development focused on previously developed sites.

It is important that NPPF Section 11 paragraphs 117 to 123 are consistently applied to ensure effective use of brownfield land. We would encourage the Council to maintain a thorough record of sites on its Brownfield Register. Appropriate densities should be achieved to optimise development and take pressure off sites in the countryside.

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

The housing densities in section 3 could be increased as appropriate to the receiving environment, particularly in central urban locations where an increase in height of buildings for apartments can achieve more housing in accessible locations.

Issue 2: Green Belt and Exceptional Circumstances (Green Belt alterations will also be discussed in relation to specific allocations during Week 2)

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)?

Yes, St Helens should only develop what is genuinely needed, and in line with what the environment can reasonably cope with. There are issues of ecology, air pollution, natural capital, and important Green Belt functions to stop St Helens merging with neighbouring towns of Warrington and Wigan.

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

Due to the issues set out under Matter 2, in essence CPRE wants a review of the housing and employment figures to ensure there is not an excessive requirement being imposed on St Helens, particularly considering the impacts of Brexit and Covid.

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?

CPRE is keen to ensure that alternative site assessments are thorough, that all suitable sites are captured on the Brownfield Register and that all potential windfalls are properly identified. In our view there is likely to be considerable commercial property coming forward due to the number of businesses going into administration rendering property obsolete, vacant and in need of new uses.

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

CPRE is concerned that a robust methodology should be applied.

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)

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

CPRE is concerned that enough land is identified for actual needed employment and housing or there are issues with identifying an adequate supply and this makes it easier for developers to target 'off-local plan' sites for development. It is important therefore that sufficient land is identified. Safeguarded is a good mechanism for ensuing flexibility, but CPRE urges caution in the quantum of land identified for development due to the important purpose of land in the Green Belt.

Please refer to the paragraphs set out in NPPF Section 13.

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

In CPRE view, 85.88 hectares and 2,641 dwellings are excessive. Many of the sites identified as safeguarded land for employment and housing have been the focus of applications for development already. Prematurity issues should have been raised.

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

CPRE has objected to some safeguarded sites being brought forward for development due to the quantum of employment and housing being excessive to what is needed, and the specific applications having a negative planning balance due to harms outweighing the benefits.

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

CPRE considers an overplanning of jobs and housing is undermining the protection of Green Belt in St Helens.

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?

There is a difficulty here as the Omega West application threatens the Bold Forest Park Area Action Plan, 2017. Obviously, CPRE would wish to see compensatory improvements to Green Belt. We note the following:

- Policy LPA09: Green Infrastructure – achieving an increase in green infrastructure will help respond to the National Capital Committee 2019 findings of national widespread ecological collapse across all aspects of the environment;
- Policy LPA11: Health and Wellbeing – during Covid the health benefits of green space has been widely reported and it is vital Green Belt and greenspace is not easily sacrificed. Existing and new greenspace should be enhanced through planning conditions and planning obligations;
- Policy LPC07: Greenways –people need more green corridors to travel via sustainable modes, such as cycling and walking;
- Policy LPC08: Ecological Network – wildlife must have space to live and move, and the large format B8 developments are so large in scale they threaten the ecological network and ecosystem services; and
- LPC09: Landscape Protection and Enhancement – St Helens has some lovely rural landscapes that have countryside character, which is of value and should be protected via the local plan.

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?

There should be a requirement for developers to show they are achieving good environmental standards set out at a national and local level. Best practice should be a requirement.

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 spatial distribution of development must be based on an urban concentration and the reuse of brownfield land in preference to greenfields. We support LPA02.

High grade farmland (BMV 1, 2, and 3a) should not be allowed for development.

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

There should be a restriction on rural development due to the increase in travel required and associated Greenhouse Gas emissions. The Government increased the target to 100% of baseline targets in 2019 (Statutory Instrument 1056). Developing in more isolated places increases car use and dependency and causes noise and air pollution. There are already problems with exceedance of air quality limits in St Helens, particularly near motorway junctions and on busy highways. The local plan must address the problems of ill health and high mortality and morbidity associated with respiratory disease linked to poor air quality.

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).

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

The Local Plan must be based on a robust, positive, and justified approach. Due to issues associated with excessive job and housing requirements, CPRE believes the amount of Green Belt release is excessive. If there is a justification based on a reduced development requirement, clearly a sustainable approach should be applied. We disagree with some of the Green Belt Review findings and will expand on this in relation to specific sites later in the Examination process.

Issue 7: Policies LPA03 and LPA01

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

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

As previously stated, based on a more realistic development quantum being identified CPRE is supportive of LPA03 Development Principles.

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

As stated above, based on a more realistic development quantum being identified CPRE is supportive of LPA01 Presumption in Favour of Sustainable Development. Inclusion of a definition of what sustainable development is recommended. We recommend the Brundtland definition "development that meets the needs of the present without compromising the ability of future generations to meet their own needs." The NPPF is weak in this regard.