HALTON BOROUGH COUNCIL

Green Belt Exceptional Circumstances

December 2017

1. Policy Context

National Planning Policy Framework (NPPF)

1.1. The NPPF highlights that the Government attaches great importance to Green Belts. It goes on to state that *'local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in* ***exceptional circumstances****, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period'*.

1.2. The NPPF does not set out what the Government consider to be exceptional circumstances.

1.3. The NPPF also sets out the need for local planning authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF.

Housing White Paper

1.4. The Housing White Paper sets out that the Government will look to continue 'Maintaining existing strong protections for the Green Belt,' and that it will look to clarify 'that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements'.

1.5. It goes on to state that 'Therefore we propose to amend and add to national policy to make clear that:

- ***authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options*** *for meeting their identified development requirements, including:*

- *making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;*
- *the potential offered by land which is currently underused, including surplus public sector land where appropriate;*
- *optimising the proposed density of development; and*
- *exploring whether other authorities can help to meet some of the identified development requirement.*

- ***and where land is removed from the Green Belt, local policies should require the impact to be offset*** *by compensatory improvements to the environmental quality or accessibility of remaining Green Belt land. We will also explore whether higher contributions can be collected from development as a consequence of land being released from the Green Belt'.*

Halton Core Strategy Local Plan

1.6. The Halton Core Strategy was adopted in April 2013, it is the central document within the Council's planning policy framework.

1.7. Policy CS6 of the Core Strategy (2013) states that
'A partial Green Belt review will be necessary during the early part of the plan period to ensure a sufficient ongoing supply of deliverable development land to meet the requirements of the Borough's separate communities as set out in CS1, CS3 and CS4. This review will be limited to meeting the identified needs of Widnes / Hale with the release of land for development strictly phased in accordance with the prioritisation of urban regeneration as set out in CS1. In addition, an Area of Search is identified to the east of Liverpool John Lennon Airport within which minor alterations will be considered in accordance with policy CS17. Green Belt boundary changes will be defined in the subsequent Delivery and Allocations Local Plan.'

1.8. The Council are currently reviewing a number of policies within Core Strategy to bring it in line with the most recent evidence base. This evidence is set out in Section 2 of this document.

2. Housing and Employment Requirements

2.1. Objectively Assessed Need or OAN is the core output of the Strategic Housing Market Assessment (SHMA). It takes into consideration trend based population and household projections, migration projections, market signals, affordable housing needs and affordability. The OAN is the basic housing need which authorities must meet. It is a 'policy neutral' figure which does not take into account whether a Borough can physically provide the required number of houses or whether the Council has further growth aspirations above and beyond the basic need.

2.2. National Planning Practice Guidance (NPPG), states that:
"The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans."

2.3. The housing requirement is a 'policy on' target which considers whether the OAN can actually be provided and whether there are justifications for the figure being above the OAN figure (e.g. if the Council has growth aspirations). The housing requirement can also be lower than the OAN figure for example if there is an inability to deliver what is required due to a lack of infrastructure. In these cases Councils must work with neighbouring authorities to determine whether they can absorb the unmet need.

Mid-Mersey Strategic Housing Market Assessment (SHMA)

2.4. The Mid-Mersey SHMA identifies an Objectively Assessed Need of 466 dwellings each year between 2014 and 2037. This would be 10,718 dwellings over the plan period.

Liverpool City Region Strategic Housing Employment Land Market Assessment (LCR SHELMA)

2.5. The Liverpool City Region SHELMA 2016 has updated some of the information and considerations of the Mid-Mersey SHMA . It sets out a demographic housing need of 254 dwellings based on the 2014 based Sub-National Population Projections, with an adjusted headship rate, to allow for a more positive household formation rate within specified age groups. It then goes onto consider the links between economic development and housing it suggests that there is an economic-led baseline housing requirement of 326 dwellings each year, this is based on Oxford Economics forecasts. The report then considers the potential economic growth scenario, this takes into account enhanced sector performance, planned and potential development and regeneration projects and assumes an increase in economic participation. The economic growth scenario would require a housing figure of 565 dwellings each year.

2.6. Within Halton the SHELMA highlights an employment jobs growth of 3,800 in the baseline scenario and 12,400 in the growth scenario. This is equated to 28.1ha of B1 uses and 20.9ha of B2 uses in the baseline scenario, 39.8ha of B1 uses and 21.1ha of B2 uses in the growth scenario and 63ha of B1, 62.3ha of B2 and 26.2ha of Small Scale B8 uses based on the past completions trend. Giving a suggested requirement of between 87.1ha and 151.5ha of employment land, without incorporating the need for 'large scale' B8.

2.7. A 'large scale' warehouse is defined as an individual unit over 9,000 square metres or approximately 100,000 square feet, this being the standard recognised definition within the commercial property sector. The SHELMA identifies a need of between 308ha and 397ha of large scale B8 Uses across the City Region.

Core Strategy and Core Strategy Review

2.8. The Halton Core Strategy Local Plan (2013) sets out a housing requirement of 9,930 homes between 2010 and 2028, equivalent to 552 homes each year, and an employment land requirement of approximately 313ha (gross).

2.9. The emerging Core Strategy Review proposes a housing requirement of 10,718 homes between 2014 and 2037, equivalent to 466 homes each year, and an employment land requirement of approximately 200ha (gross).

2.10. Since 2010, 2,884 homes have been completed; this is below the 3,864 homes expected based on the Core Strategy (2013). Since 2014, 1,694 homes have been completed. Table 2.1 below shows the completions each year.

Table 2.1: Completions

Halton	Gross Dwelling Gain	Losses from demolitions / conversions	Net Dwelling Gain
2010/11	260	89	171
2011/12	325	8	317
2012/13	343	3	340
2013/14	262	33	229
2014/15	507	11	496
2015/16	484	4	480
2016/17	703	4	699
Total	**2,884**	**152**	**2,732**
Average (2010~17)	**412**	**22**	**390**

CLG Standard Methodology

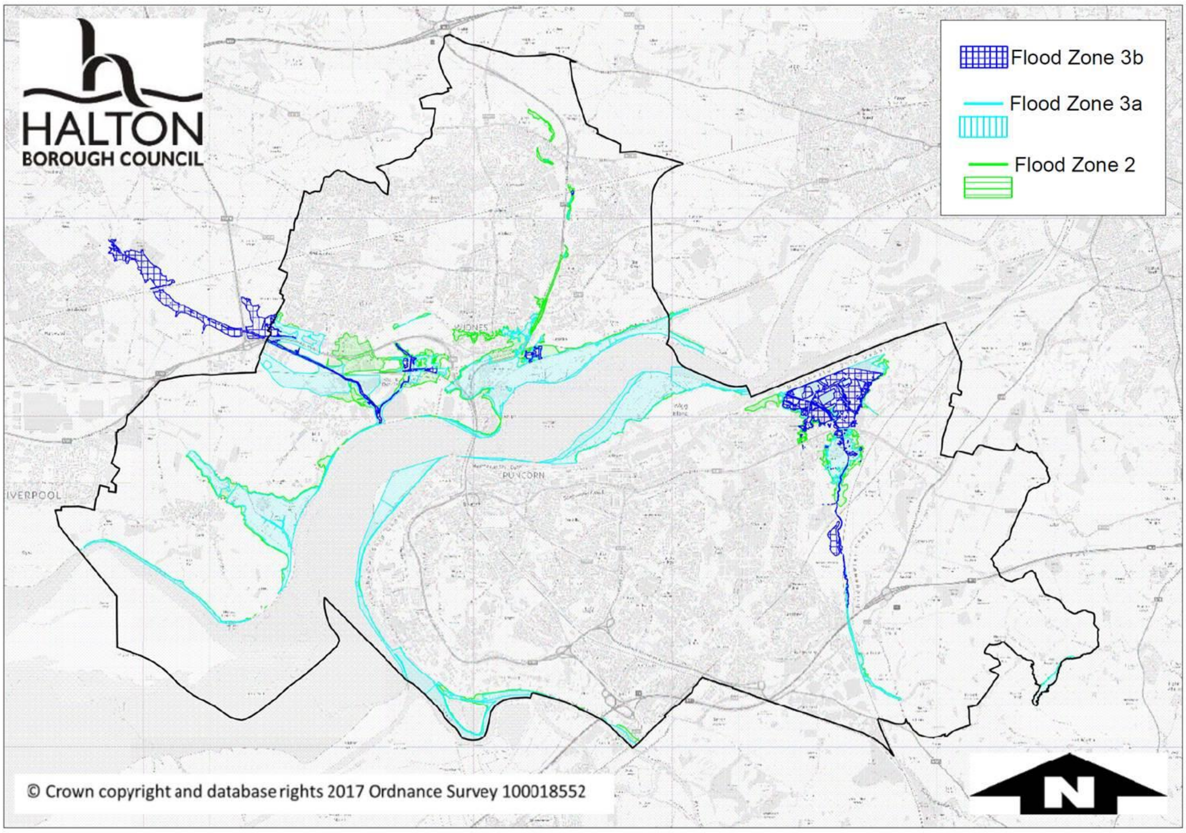
2.11. The Government is currently consulting on a standard methodology for calculating housing need across the country. The 'Planning for the right homes in the right places' consultation document seeks to create a standardised, simple methodology to calculate housing need for each local authority in a manner that is clear and transparent. The document proposes that the starting point should continue to be a demographic baseline, which is then modified to account for market signals (the price of homes). The document suggests that the indicative assessment of housing need based on the standardised methodology for Halton, in the 10 year period 2016 to 2026, is 285 dwellings each year.

3. Development Constraints

Flood Risk

3.1. In plan-making, local planning authorities should apply a sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk. The aim should be to keep development out of medium and high flood risk areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible.

Figure 3.1 Flood Risk Zones in Halton.



3.2. Caravans, mobile homes and park homes intended for permanent residential use are considered to be 'highly vulnerable' uses are only considered appropriate within Flood Zone 1 (lowest risk) and potentially in flood zone 2 following an exceptions test. Dwellings and residential institutions are considered to be 'more vulnerable' uses and are only considered appropriate within flood zone 1 and 2 and potentially within flood zone 3a following an exceptions test. Employment uses, such as offices, general industry and storage distribution are considered to be 'less vulnerable uses' and are considered appropriate in flood zone 1, 2 and 3a. Only water compatible uses are considered appropriate within flood zone 3b and this is providing they can remain operational and safe for users in times of flood, result in no net loss of floodplain storage and they do not impede water flows or increase flood risk elsewhere.

Hazardous Installations and Pipelines

3.3. The Health and Safety Executive (HSE) is a statutory consultee on certain developments in the vicinity of major hazard sites and major accident hazard pipelines.

3.4. Figure 3.2 below shows the location of Hazardous Installations and Pipelines in Halton and the consultation zones for each installation. The consultation zones are normally determined by a detailed assessment of the risks and/or hazards of the installation or pipeline which takes into account the following factors; the quantity of hazardous substances for which the site has hazardous substances consent and details of the storage and/or processing; the hazard ranges and consequences of major accidents involving the toxic and/or flammable and/or other hazardous substances that could be present. The risks and hazards from the major hazard are greatest in the Inner Zone and hence the restrictions on development are strictest within that zone.

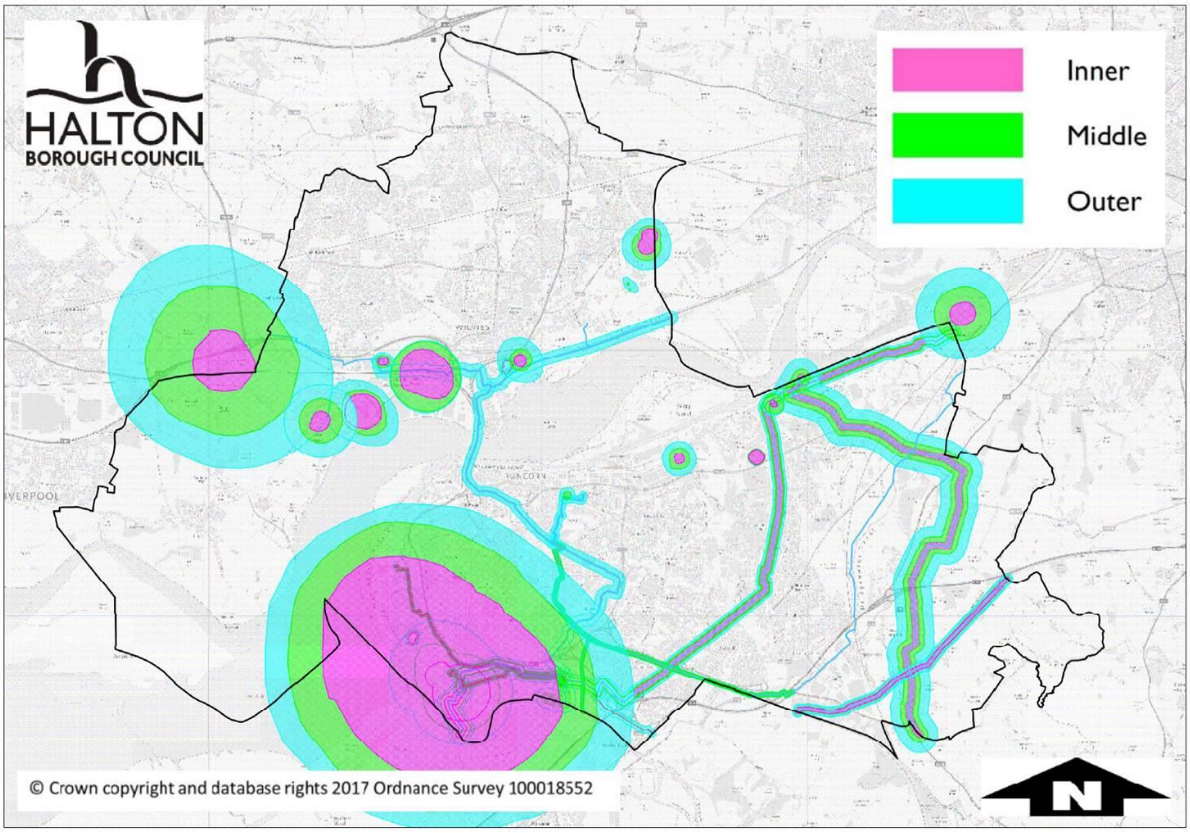
3.5. The HSE may advise against development of certain types within each consultation zone. Generally the HSE consider that:

i. Within an inner zone:
   a. Housing is not compatible; the only exception is for developments of 1 or 2 dwelling units where there is a minimal increase in people at risk.
   b. Retail developments with less than 250m^2 total floorspace are compatible.
   c. Workplaces providing for less than 100 occupants in each building and less than three occupied storey are compatible.

ii. Within a middle zone:
   a. Only housing developments of up to, and including, 30 dwellings and at a density of no more than 40 dwellings per hectare are compatible.
   b. Retail developments with total floor space up to 5000m^2 are compatible with a middle zone.
   c. Workplaces can be compatible.

iii. Within an outer zone:
   a. Housing can be compatible.
   b. Retail developments with more than 5,000m^2 total floorspace are compatible.
   c. Workplaces are compatible.

Figure 3.2: Hazard Risk (PADHI*) zones in the Borough



* *Planning Advice for Developments near Hazardous Installations*

3.6. Figure 3.2 shows the restrictions to development in certain parts of the Borough, for example the limit to residential development within Weston and Weston Point created by the Inner consultation zone.

Airport Public Safety Zone

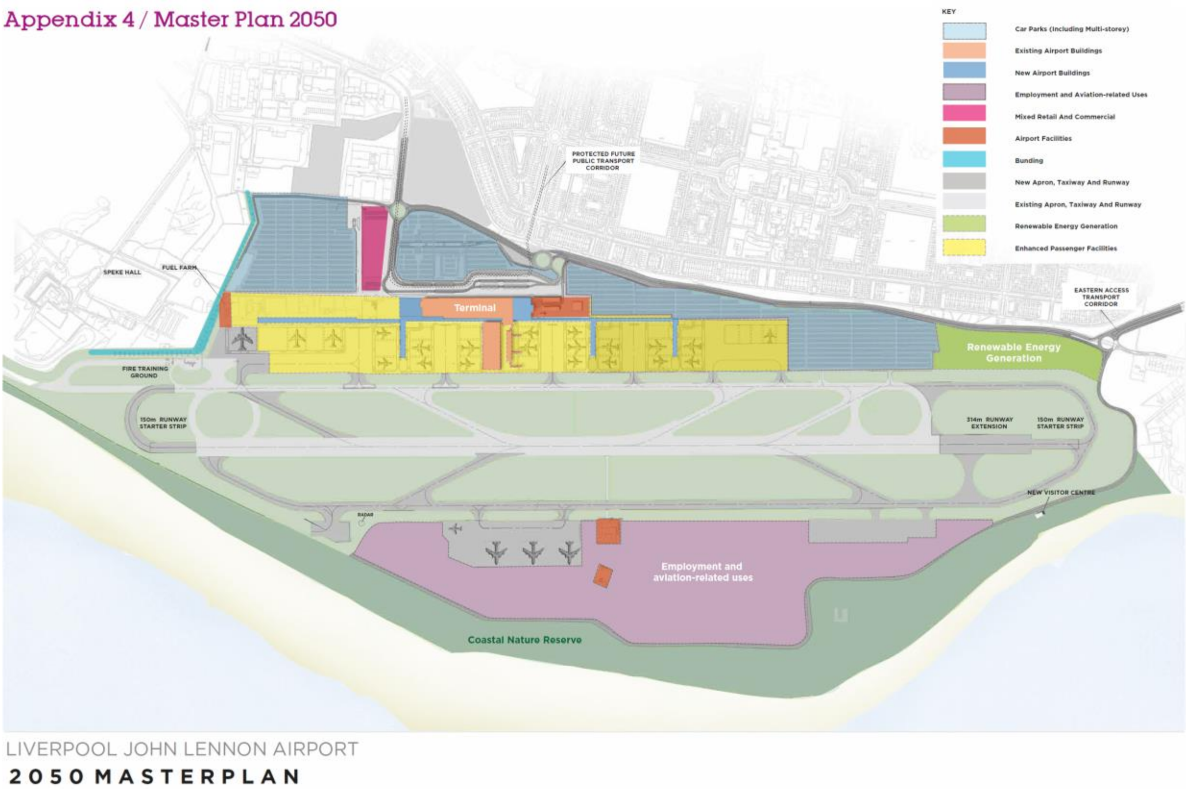
3.7. Public Safety Zones are areas of land at the ends of the runways at the busiest airports, within which development is restricted in order to control the number of people on the ground at risk of death or injury in the event of an aircraft accident on takeoff or landing. The basic policy objective governing the restriction on development near civil airports is that there should be no increase in the number of people living, working or congregating in Public Safety Zones and that, over time, the number should be reduced as circumstances allow.

3.8. The Public Safety Zone for Liverpool John Lennon Airport is shown in Figure 3.3 below.

3.9. However, the consultation draft of the Liverpool John Lennon Airport Masterplan to 2050 (2017) seeks to extend the length of the runway to cater for larger aircraft and to create the ability to serve long haul destinations. This in turn is likely to lead to the amendment and potential extension of the Public Safety Zone from its current position. The potential extension is shown in Figure 3.4.

Figure 3.3: Liverpool John Lennon Airport Public Safety Zone (PSZ)

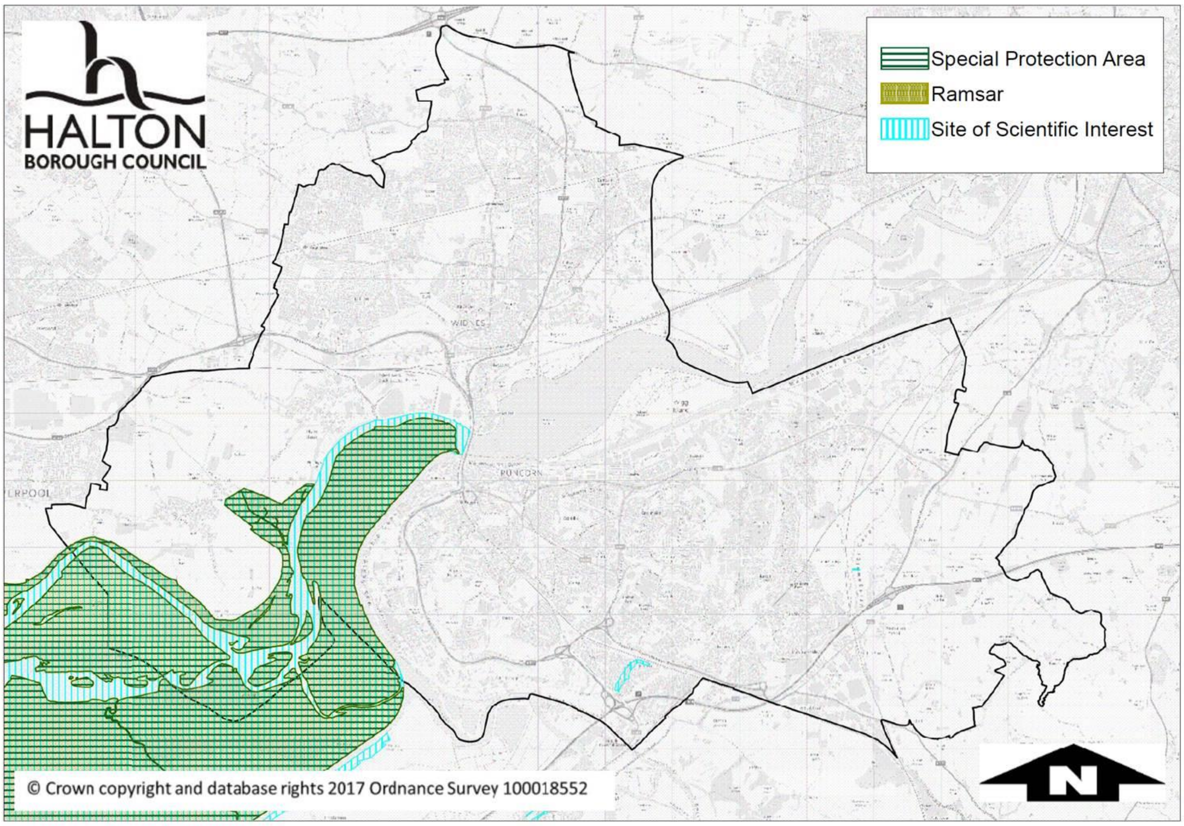
Figure 3.4 Draft Liverpool John Lennon Airport Masterplan showing potential runway extension



International and Nationally Protected Sites and Areas: Ramsar, Special Protection Area (SPA), Sites of Special Scientific Interest (SSSIs)

3.10. Figure 3.5 shows the Protected Sites and Areas within the Borough, these are both internationally protected e.g. Ramsar and SPA and nationally protected e.g. SSSIs.

Figure 3.5: Protected Areas and Sites within the Borough

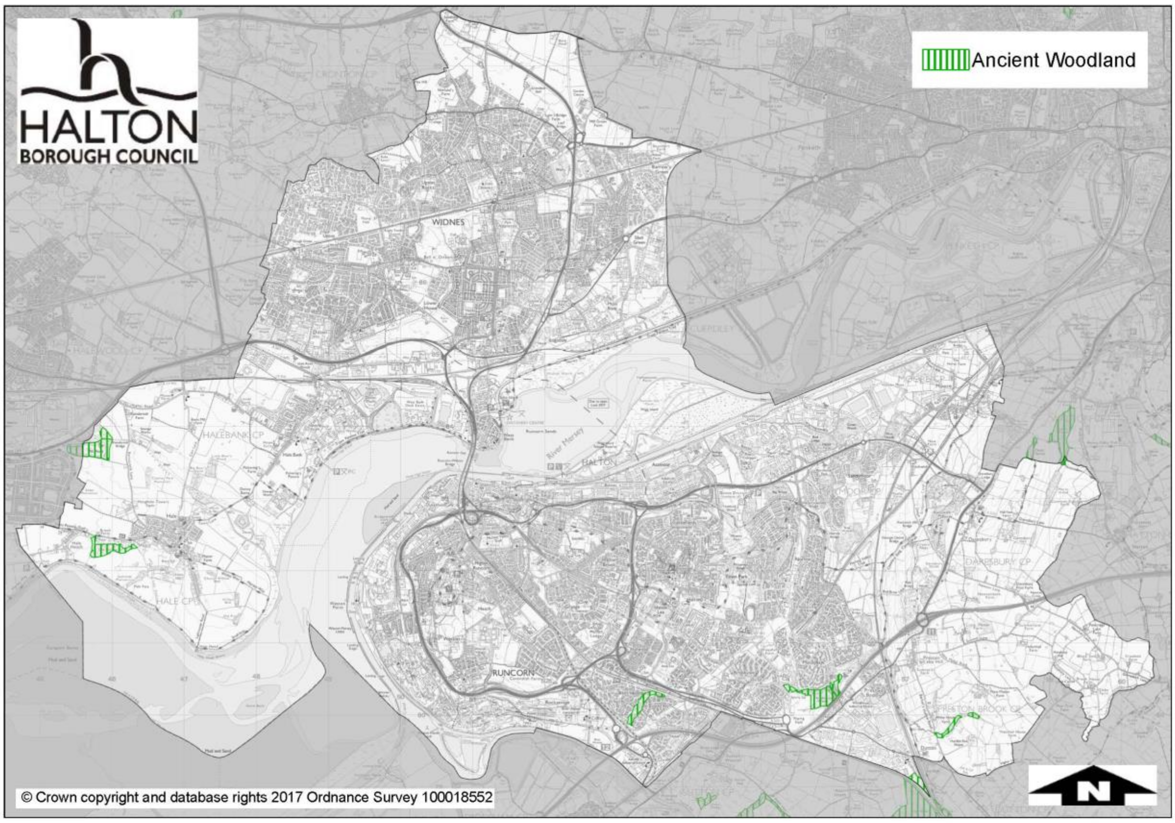


Ancient woodland and veteran trees

3.11. Trees and woodland classed as 'ancient' or 'veteran' are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreation, cultural value, history and contribution to landscapes.

3.12. Natural England and the Forestry Commission encourage planning authorities to avoid developments that would lead to loss or deterioration of irreplaceable habitats unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Figure 3.6: Ancient Woodlands



4. Other Reasonable Options

Strategic Housing Land Availability Assessment (SHLAA)

4.1. The SHLAA sets out the latest position on housing land supply as assessed by the Council. The 2017 SHLAA identifies capacity for 7,179 deliverable and developable homes within the Borough. This does not include any land currently located within the Green Belt. However, of these homes 841 of them are under construction and 1,535 of them already have planning permission.

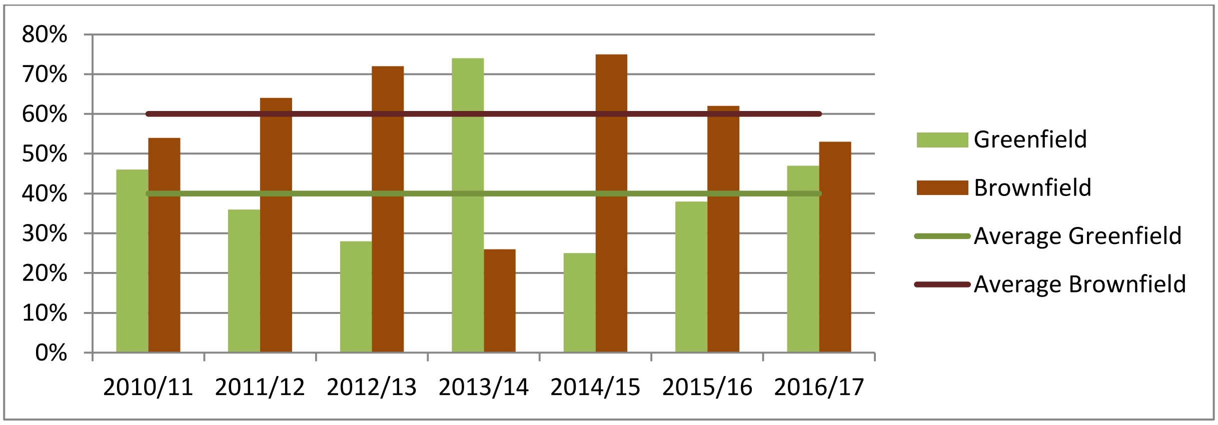
Brownfield Land

4.2. NPPF states that planning policies should encourage the effective use of land by re-using land that has been previously developed, provided that it is not of high environmental value.

4.3. The current Halton Core Strategy Local Plan, and the emerging Delivery and Allocations Local Plan, both look to support urban renewal and maximise the sustainable use of existing infrastructure through the prioritisation of development on previously developed land with policy seeking that at least 40% of new residential development are delivered on (brownfield) previously developed land.

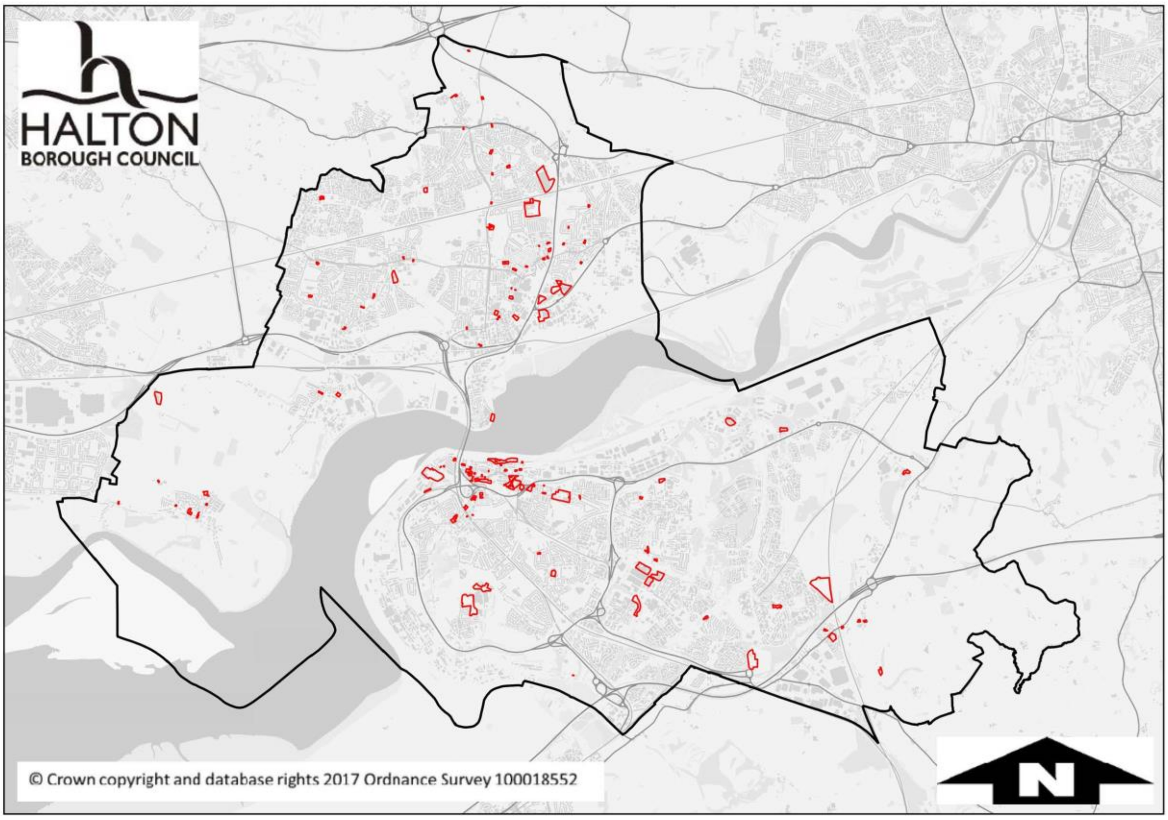
4.4. Since 2010, 60% of dwellings completed within the Borough have been built on brownfield land. The proportion and numbers of dwellings fluctuate each year reflecting the sites that are brought forward for development during that year.

Figure 4.1: Proportion of Dwellings built on Brownfield Land



4.5. The SHLAA 2017 (base date 31st March 2017) identifies potential capacity for 2,828 (gross) dwellings (2,346 net) on deliverable or developable brownfield sites. Figure 4.2 below shows the location of these sites.

Figure 4.2: Deliverable and Developable Brownfield Sites



Source: Halton Strategic Housing Land Availability Assessment (SHLAA) 2017

4.6. Although there are other previously developed sites within the Borough, these are not considered developable at the current time due to other constraints, in some cases this may be due to the contamination on the site caused by the previous development.

4.7. The draft Brownfield Register 2017 identifies 30 sites with the potential for housing led development. It identifies capacity for between 899 and 2,083 homes. These sites are all already contained within the SHLAA and do not contribute any further to the potential supply from brownfield sites.

4.8. It is evident that there is not sufficient brownfield land available to meet the housing requirements, indeed it is likely it will only contribute 26% of the development required.

Vacant Homes

4.9. There were 1,230 vacant homes in Halton in October 2016, 445 of these homes are considered to be long term vacancies and 54 of these long term vacancies are owned by Registered Providers, none of them are owned by the Council[1]. There are 56,960 homes within Halton[2], so about 2% of these are vacant and less than 1% are considered to be long term vacant.

1.1.

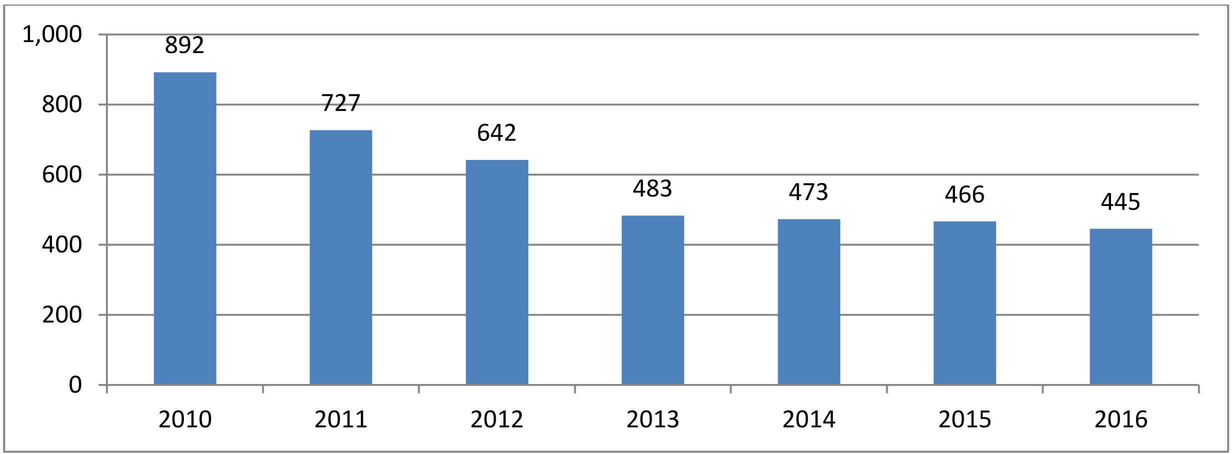
[1] Table 615: Vacant dwellings by local authority district: England from 2004
https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants
[2] Table 125: Dwellings stock estimates by local authority district 2001 to 2016
1.5.

4.10. Some of these 1,230 vacant homes are unlikely to stay empty for long, they may be being renovated or refurbished; on the market for sale or rent; or in probate as part of an estate. It is acknowledged that the market requires a proportion of these empty homes in order for the market to work.

4.11. To encourage these homes to be brought back into use, empty homes are still liable for Council Tax unless they meet an exemption criterion, for example the home is empty due to the occupant receiving care in a hospital. From April 2017 the Council has removed the discount for homes which are unoccupied and unfurnished.

4.12. It is expected that the removal of the Council Tax discount will encourage a number of these vacant properties to be brought back into use. However, due to the small numbers of homes in long term vacancy it is unlikely that this will make a significant contribution to the housing supply within the Borough. Figure 4.3 shows the reduction in the numbers of long term vacant homes in Halton since 2010. There was significant reductions between 2010 and 2013, with however since 2013, the reduction has stabilised at about 10 units per annum. This suggests that efforts to reduce long term vacant units have very limited scope to contribute to the future housing supply.

Figure 4.3: Long Term Vacant Homes in Halton



Estate Regeneration

4.13. The Council has regenerated a number of estates within the Borough over the years, most recently seeing the redevelopment of Castlefields. The Council will continue to work towards providing an appropriate level of quality of life within the urban areas, which may lead to further estate regeneration in future.

4.14. At present the only area known to be under consideration for regeneration is Murdishaw in Runcorn. The Council are working with partners including Liverpool Housing Trust (Onward Housing) and Riverside Housing on the potential for estate regeneration within Murdishaw. This is likely to see the redevelopment of some of the existing residential areas within Murdishaw and the potential redesign of the local centre. The redevelopment is likely to see a

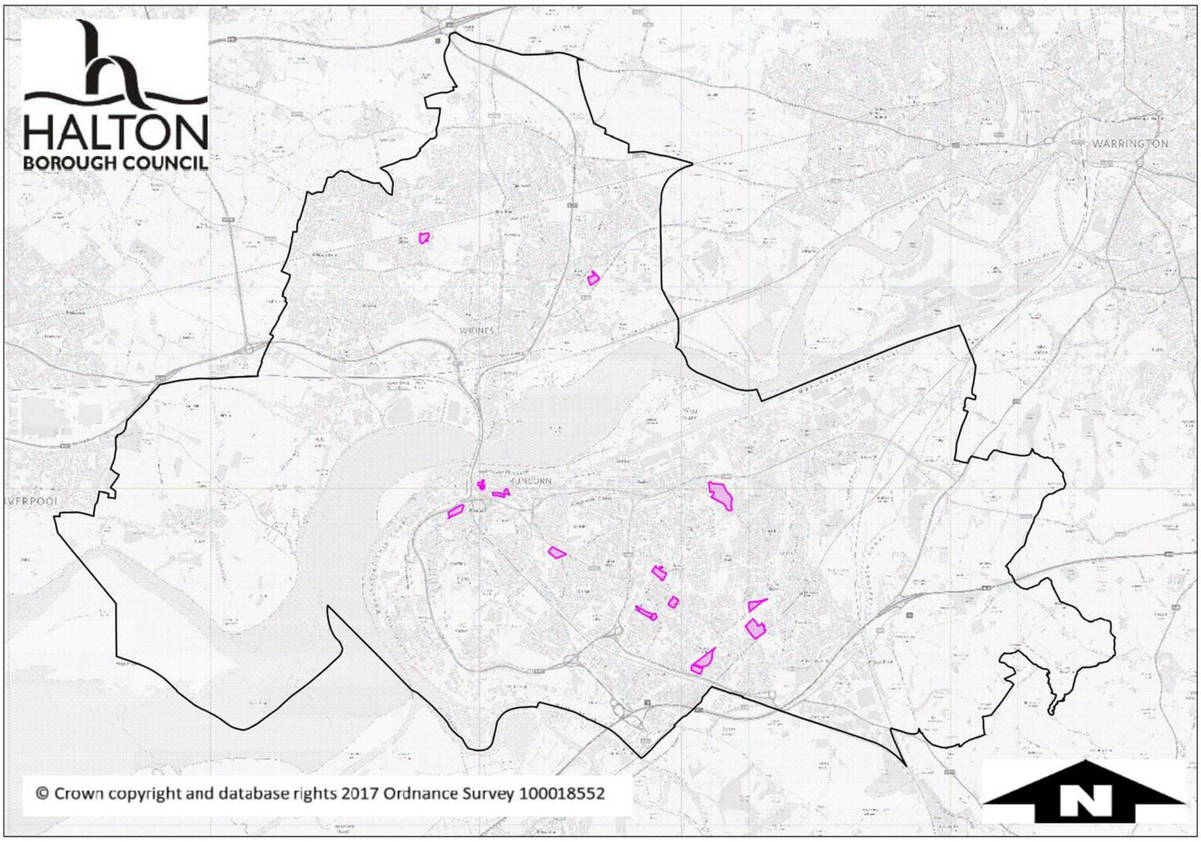
1.3. https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants proportion of housing in the area demolished, and new housing built which is more suited to the current needs of the population in this area. It is likely to see more efficient use of land in the area, and may see a small increase in the number of dwellings in this part of the Borough, likely to be in the region of 200 homes.

Surplus Public Sector Land

4.15. The Council have been actively identifying and selling off surplus Council owned land for a number of years, and many of these sites are now developed or are under construction. There are very few remaining Council owned sites which are considered surplus to requirements, and fewer still that also have potential for residential development.

4.16. Figure 4.4 below shows sites which remain within the ownership of the Council, which may have potential for development. Together these sites would have a potential capacity for 797 homes. However, these sites are all already considered within the SHLAA and do not contribute any further to the potential supply of housing land. There is also potential for these sites to overlap with sites in other parts of the supply such as brownfield land or open space.

Figure 4.4: Surplus Public Sector



4.17. The Council have been working closely with health providers in relation to the Healthy New Towns initiative and the potential for Halton Hospital in the future. It is considered that there may be potential for residential on surplus land within the hospital site within the Local Plan period. This will be dependent upon the NHS Trust securing funding to redevelop and reconfigure the site for its primary purpose. As potential funding is uncertain and no masterplan exists, it is not possible to make an allowance for potential housing supply at this time.

Increased Density

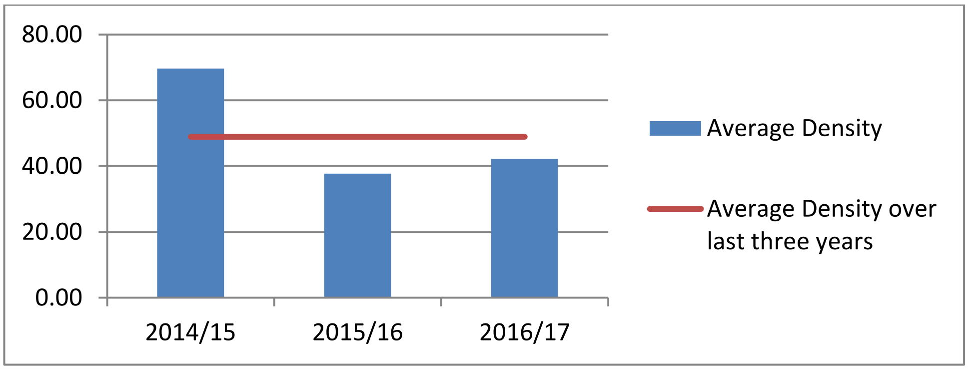
4.18. The NPPF states that local authorities should set their own approach to housing density to reflect local circumstances. The current Halton Core Strategy Local Plan, and the emerging Core Strategy Review both set a policy to ensure the efficient use of land with a minimum density on individual sites of 30 dwellings per hectare (dph) and in more accessible location a density of 40 dph.

4.19. It is considered that the seeking of 30 dwellings per hectare as a minimum will aid in the efficient use of land, whilst allowing for an increased density around town, district or local centres or transport interchanges will help to promote redevelopment. Good design can increase density while protecting and enhancing the character of an area.

4.20. At present the SHLAA uses this policy as a basis for the potential capacity of sites, where no alternative data is available. Therefore within the SHLAA if there is a planning permission or a prior approval for a site this data is used as the basis for the potential capacity, however, where there isn't, there is a presumption that it will be built at 40dph in accessible locations and 30dph elsewhere.

4.21. Since 2014 the average density of developments has been 49 dwellings per hectare. This demonstrates that the existing policy is working.

Figure 4.5: Average density of development



4.22. The density of development and the character of the Borough differs dependent on the area within the Borough. However, there are some general points that are consistent, for example across the Borough there are very few developments of more than 3 storeys and those of 5 storeys or more are even fewer. Areas of terraced housing, with small or no garden space, and on street parking tend to be of the areas of the Borough with the highest densities for example areas such as Dukesfield in Runcorn or West Bank in Widnes. Whilst areas with detached homes, large gardens and multiple off street parking spaces tend to be the areas with the lower densities for example areas such as Sandymoor in Runcorn or Lancaster Place in Widnes.

4.23. The SHLAA identifies a number of higher density developments that have not yet come forward, largely comprising of apartment schemes granted permission prior to the last recession, such as the remaining plots of The Deck.

4.24. The 'Housing Sites: Developable Area Estimates Topic Briefing Note' highlights some of the differences in densities and the proportion of areas developed across the Borough.

Opportunities within Employment Areas or Employment Land

4.25. There are some employment areas that are gradually changing away from employment uses to more residential uses and this change is likely to continue to be support for example Halton Road in Runcorn. However, there are other employment areas where the Council will look to support the regeneration of the sites but seek to retain the site within employment uses for example Astmoor Industrial Estate.

4.26. Where the Council are aware and potentially supportive of residential development within employment areas or employment land these sites have been included, and given consideration, within the SHLAA.

Open Space

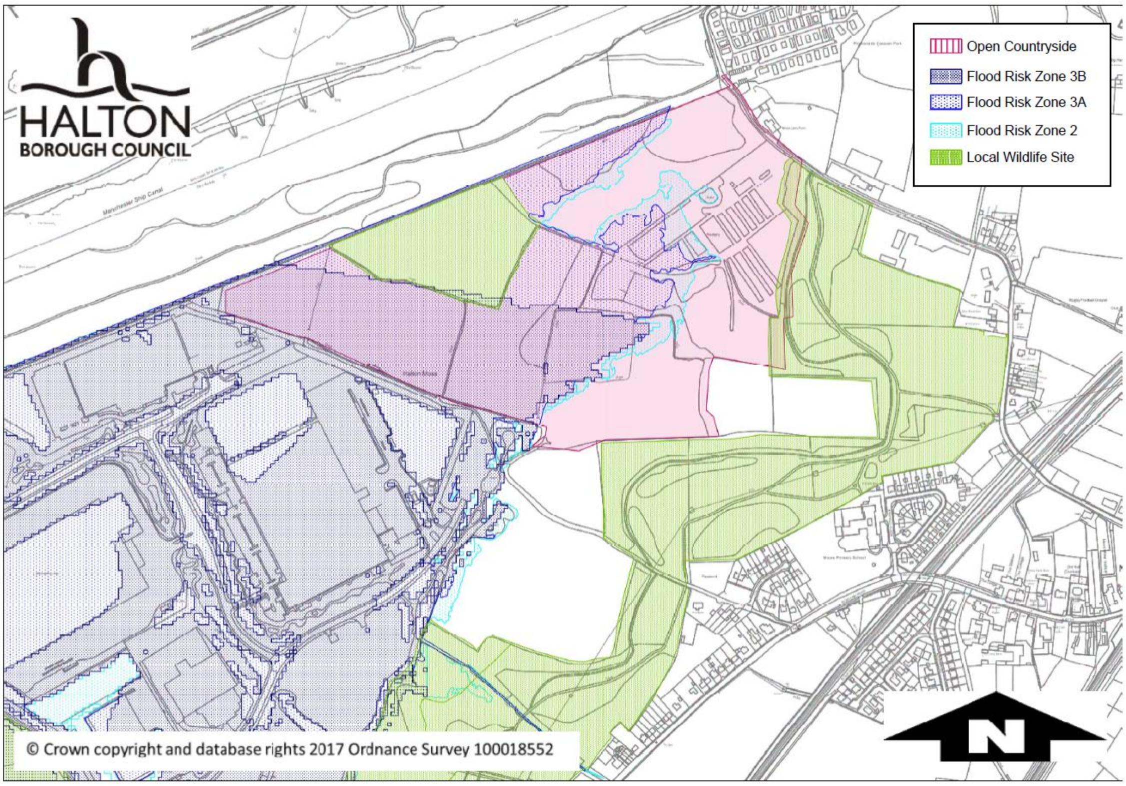
4.27. The Council has not identified a significant supply of surplus Open Space. Previous studies have identified deficiencies in the supply of different typologies of open space across different areas of the Borough. Open Space requirements are assessed relative to local population numbers. As the population is forecast to increase, this will increase the requirement for open space across the borough.

4.28. The emerging Delivery and Allocations Local Plan will seek to allocate some areas of existing greenspace within the urban area with others being picked up through the SHLAA. As such, it is not appropriate to ascribe a 'per annum' assumption for potential housing supply from this source.

Land outside of the Green Belt

4.29. Figure 4.6 below shows the area of land outside of the currently developed areas, currently allocated areas and not within the Green Belt. This area is identified as 'Open Countryside' within the Halton UDP.

Figure 4.6: Open Countryside



4.30. This could provide 19.97ha of land. However, it should be noted that much of this area is within flood risk zones, as shown on Figure 3.1 and Figure 4.6, that part of the site is already in use as a nursery and that consideration would need to be given to the adjacent Local Wildlife Site.

Other authorities

4.31. Warrington and St Helens are the other authorities within the currently defined Mid-Mersey Housing Market Area. Both of these authorities are also undertaking a review of their Green Belts. St Helens Local Plan Preferred Options[3] includes potential sites to be released from the Green Belt within their own Borough for both housing and employment, whilst Warrington's Local Plan Preferred Development Option[4] includes potential areas to be release from the Green Belt. Warrington Borough Council have also made a formal request to the Borough to consider if Halton could provide any land to meet their needs. It is therefore considered that it is not possible for other authorities within the housing market area to take any homes on behalf of Halton Borough Council, to negate the need for Green Belt release within the borough.

4.32. Other authorities within the Functional Economic Area include Knowsley, Liverpool, Sefton, West Lancashire and Wirral. The most recent Housing Market Area assessments have identified low levels of migration between Halton and each of these authorities and conclude that they lie within a different housing market area, and as such have little ability to provide for

1.1.

[3] St Helens Local Plan 2018-33 Preferred Options consultation document from December 2016 (https://www.sthelens.gov.uk/localplan)

[4] Warrington Local Plan Preferred Development Option Regulation 18 Consultation July 2017

housing needs arising in Halton. Knowsley has recently adopted a Local Plan that released significant land from its Green Belt to meet its own locally arising need, as have Sefton and West Lancs. Wirral are progressing their Local Plan which is having to consider Green Belt release to meet their locally arising needs. Liverpool City are progressing their Local Plan but are not believed to have excess urban land to meet displaced needs from neighbouring authorities.

4.33. Cheshire West and Chester, is the only other neighbouring authority. It is identified as falling within a separate Housing Market Area and Functional Economic Market Area, and have also had to release land from the Green Belt in their latest Local Plan to meet their locally arising needs.

4.34. As such, it is not possible for neighbouring authority/authorities to accommodate displaced housing or employment requirements from Halton within existing urban (i.e. non-Green Belt) locations.

5. Housing Land Supply

5.1. As set out in Section 1, the Halton Local Plan sets a housing figure of 466 dwellings each year. Table 5.1 below sets out the number of dwellings required according to the Local Plan, the numbers of dwellings already completed, under construction or with permission and the potential number of dwellings that leaves to be allocated.

Table 5.1 Housing Land Required		
A	**Housing Requirement**	**10,718**
B	**Completions** 2014/15-2016/17 (net)	**1,675**
C	**No. of dwellings on sites under construction** (at 31/03/17) (net)	**841**
D	**No. of dwellings on sites with Planning Permission** (at 31/03/17) (net)	**1,499**
E	10% non-delivery supplement to the existing commitments	**150**
F	**Total dwellings needing to be Allocated** (A-B-C-D+E)	**6,853**

5.2. Taking into consideration the other reasonable options set out in section 4 provides the following potential housing land supply:

Table 5.2 Other Reasonable Options			
H	Strategic Housing Land Availability Assessment (SHLAA)	4,801	SHLAA housing land supply without planning permission (not included in C and D)
I	Brownfield land	0	None additional over and above the SHLAA
J	Vacant homes (10 homes each year, 2017 to 2037) (10 x 20)	200	
K	Estate regeneration	200	
L	Surplus public sector land	0	None additional over and above the SHLAA
M	Increased density	0	
N	Opportunities within Employment Areas or Employment Land	0	
O	Open space	0	
P	Land outside of the Green Belt	0	Not suitable for housing, likely to be allocated for employment uses.
Q	Other authorities	0	
R	10% non-delivery supplement to the potential supply	**520**	
	TOTAL	**4,681**	

Table 5.3	
Total dwellings needing to be Allocated	6,835
Total Potential Supply	4,683
Remainder	2,152

6. Exceptional Circumstances

Given the position set out in sections 2, 3 and 4, the Council considers that it would not be possible to meet the Objectively Assessed Need for the Borough without releasing land from the Green Belt. The Council therefore considers that there are exceptional circumstances requiring the release of land from the Green Belt in Halton at this time.

6.1. Green Belt release will form part of the comprehensive plan for the future development of Halton, this will be alongside development of previously developed sites and the other reasonable options as set out in section 4.

6.2. To not release sites from the Green Belt would lead to a significant undersupply of homes compared to the identified needs. This could lead to further issues of housing affordability, access to housing for younger households and competition for existing employment sites. Failure to identify sufficient land for employment uses would also and have an adverse impact on the economy of the Borough and its contribution to the wider City Region, potentially increasing unsustainable commuting patterns with the resultant economic and environmental impacts.

Green Belt Release

6.3. The Council have undertaken a review of the Green Belt across the Borough the results of which are set out in the Green Belt Study 2017. The Green Belt was split into a number of different parcels and groupings in order for an appropriate assessment to be made as to their contribution to the five purposes of the Green Belt.