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**ST HELENS BOROUGH
LOCAL PLAN 2020-2035**

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REPRESENTATION ORDER

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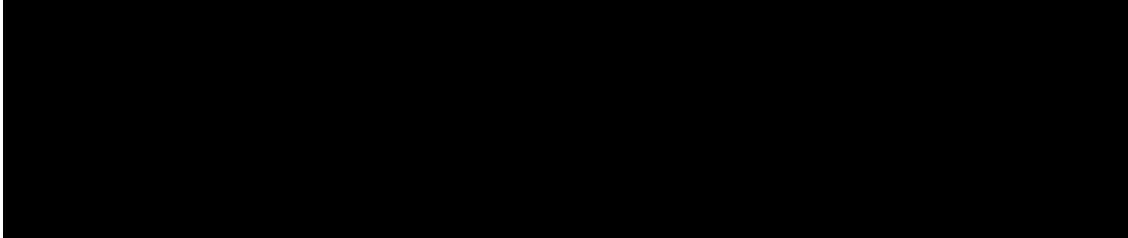
Representations on behalf of Jones Homes (North West) Limited - Submission Draft

Lorraine Robertson

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:49



1 Attachment



27131.A3.VR Representations and Encl. by Jones Homes NW FINAL 13.03.19.pdf

Local Plan Team,

On behalf of our Client, Jones Homes (North West) Limited, please find enclosed representations to the Submission Draft Local Plan.

Please confirm receipt.

Many Thanks

Lorraine

Lorraine Robertson
Senior Planner



Tower 12, Bridge Street, Spinningfields, Manchester, M3 3BZ

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① - LPA02

② - LPA05

③ - LPA05 - TABLE 4.6

④ - GBR

⑤ - HERITAGE IMPACT ASS

⑥ - LPA06

⑦ - APPENDIX 4 MONITORING FRAMEWORK

⑧ - SHLAA

⑨ - LPA04

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St Helens Borough Council
Town Hall
Victoria Square
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By Email: planningpolicy@sthelens.gov.uk

27131/A3/VR
13 March 2019

Dear Sir/Madam,

ST HELENS BOROUGH LOCAL PLAN 2020-2035 – SUBMISSION DRAFT CONSULTATION REPRESENTATIONS BY JONES HOMES (NORTH WEST) LIMITED

On behalf of our Client, Jones Homes (North West) Limited, we write to set out our representations to the above consultation.

These representations are intended to assist St Helens Council ("the Council") in finalising its Local Plan and evidence base in advance of submission to the Secretary of State, to ultimately ensure that the Local Plan is sound, in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF). We trust that these representations are of assistance to the Council.

Introduction

Jones Homes is one of the UK's leading housebuilders, creating high quality homes in desirable locations since 1959. Currently building more than 600 homes a year in the UK, Jones Homes offers an impressive portfolio of apartments, mews and townhouse residences, as well as spacious detached homes.

Jones Homes, which is part of The Emerson Group, boasts a strong record of delivering successful developments in St Helens. Recent housing schemes that have been delivered, or are in the process of being delivered, include:

- Newlands Grange – 153 units
- Eccleston Grange – 283 units
- Former Caremlite Monastery – 12 units

Orbit Developments, also part of the Emerson Group, has completed a local centre at Eccleston Grange and Linkway West, a 67,602 sq.ft leisure and retail development in the centre of St Helens. These developments represent a £12.5 million investment across the local area.



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Land East of Newlands Grange, Newton-le-Willows

-4HS

Jones Homes' ("our Client") primary land interest in respect of the Local Plan relates to Land to the East of its recently completed Newlands Grange development at Newton-le-Willows. This 15.6 hectare site has been promoted by our Client throughout the preparation of the Local Plan.

In response to the Local Plan Preferred Options Consultation (December 2016 to January 2017), which identified our Client's land at Newton-le-Willows as a Safeguarded Housing Site (Site Ref: HS14) capable of accommodating 291 dwellings, our Client submitted detailed representations to the Council promoting the deliverability of the Site. This included a desktop published Development Framework document, which was updated in May 2018 following further discussions with the Council. The document addressed the potential constraints of the Site and provided a strong framework for delivery, including a neighbourhood connectivity and facilities assessment and an Illustrative Masterplan. The document provided evidence of the economic, social and environmental benefits that the Site could deliver, as well as a development trajectory, to demonstrate that the Site could, if allocated, be delivered within the Local Plan period, including completions within the first five years of Local Plan period.

The Development Framework Document and accompanying representations from the Preferred Options stage are enclosed with this letter.

Scope of Representations

Notwithstanding our Client's previous submissions, the Submission Draft Local Plan ("SDLP") has retained the allocation of Land East of Newlands Grange as Safeguarded Land under policy LPA06. Table 4.7 of the SDLP lists the Site as reference *4HS: Land East of Newlands Grange (former Vulcan works) and west of the West Coast mainline, Newton-le-Willows*. The SDLP, whilst retaining the status of the Site from the Preferred Options document, has reduced the Site area from 15.56 hectares to 9.76 hectares. These representations comment on the evidence relied on by the Council to justify the reduction in site area, and conclude that the required justification is not provided.

According to the *St Helens Borough Local Plan 2020-2035 Green Belt Review (December 2018)*, the Site has a 'low' significance to Green Belt purposes, but is only rated 'medium' (as opposed to 'good') in terms of development potential. This results in a site score of 5 out of 6, which places it in the Tier 2 group of sites, which have less potential for housing allocation than Tier 1 sites. These representations analyse the reasons for this scoring and address them accordingly in order to demonstrate that the Site should be determined as having a 'good' development potential, thereby falling within the Tier 1 group of sites.

In addition to the above site specific issues, whilst our Client is generally supportive of the SDLP there are some strategic policies that require further justification or revisions in order to be considered sound. There are also areas of the SDLP evidence base that are not sufficiently up-to-date. Finally, our Client does not consider the Monitoring Framework of the SDLP to be appropriate and adequately justified.

Site Specific Matters

The December 2018 Green Belt Review, referenced above, identifies the Site subject of our Client's interests as sub-parcel reference *GBP_044: Land West of the West Coast mainline and East of Newlands Grange*.

At this juncture, we highlight that site referencing throughout the Council's evidence base and the progress of the Local Plan has been inconsistent and is potentially confusing. For example, our Client's Site has been labelled as reference 'HS14', 'GB3_067', 'GBP_044' and now '4HS'. It is imperative that the public, stakeholders, promoters and the examining Inspector is able to clearly track the Council's assessment process, linked to the various evidence base assessments; but the inconsistent referencing throughout the process creates the potential for confusion and misunderstanding.

Returning to the Green Belt Review, Table 5.3 of the document summarises the ranking attributed to each residential Site. Under the Stage 1B Score, our Client's Site is concluded as having a 'low' significance to Green Belt purposes, thereby scoring 3 out of 3 under the Stage 3A ranking. Our Client supports this conclusion. ✓

Under the Stage 2A assessment, our Client's Site is not identified as having any prohibitive constraints to development. ✓

Development Potential

Under the Stage 2B developability assessment, as highlighted above, our Client's Site is categorised as having a 'medium' development potential, thereby scoring 2 out of 3 under the Stage 3A ranking. Table 5.4 of the Green Belt Review sets out the reasons for this conclusion, which is referred to as the Stage 3 refinement exercise. Table 5.4 states that the 'highway network in the surrounding locality has a number of constraints'. It then goes on to state:

'For example, Alder Root Lane, which links this area of Newton to the Warrington to the south (sic), is a narrow country lane (single track in places) which includes an awkward bridge under the railway. The highway issues in the area are likely to prove difficult to fully address. Therefore further work on the surrounding highway network is likely to be required before the extent of development potential within the parcel can be confirmed.'

By citing the above as an example, the suggestion of using such text is that there are additional issues. However, no further highway constraints are referenced in the Council's assessment. Consequently, we must assume that there are no further matters of concern. In addition, it is not clear whether the above conclusions are supported by robust technical highways evidence. Without confirming this, the evidence base cannot be regarded as robust. 4

In contrast, to this lack of technical evidence, our Client has instructed Focus Transport Planning to review the Table 5.4 comments, set out above, and provide a Transport Representations Appraisal in response. The Technical Note concludes that the Council's concerns in relation to the surrounding highway network are unfounded, and, consequently, highway constraints do not prohibit the developability of the Site. In summary, the Appraisal concludes the following:

- The Site benefits from a wide range of sustainable travel opportunities for future residents;
- The Site benefits from convenient access to key local facilities and services via existing local walking and cycling infrastructure;
- The surrounding highway network has a predominantly positive safety record;
- In granting planning permission for the adjacent Newlands Grange development, the Secretary of State and Inspector considered the surrounding highway network to be suitable for accommodating the development of circa 630 dwellings;
- The restricted geometry of the road network to the south of the Site means that traffic travels at lower speeds, with higher levels of awareness, resulting in an acceptable level movement; and
- Predicted vehicular trips from the Site are not expected to be substantive enough to have any material effect on sensitive local highway network links. 4

It can therefore be concluded that **there are no highway constraints that act as a barrier to the Site's development.** 4

Table 5.4 also refers to the need for attenuation measures being required to limit noise from the railway line along the eastern boundary of the Site. It is not clear whether the Council considers this to be a factor affecting the developability of the Site, and subsequently the scoring attributed to the Site under stage 2B. However, we can confirm that this issue has already been factored into our assessment of the Site's deliverability set out in the enclosed Development Framework. The Illustrative Masterplan contained within the Development Framework incorporates a 20m 'no-development' easement, as does the updated Masterplan enclosed separately with these 4

representations. Such an easement is a commonly applied design mitigation when developing adjacent to a railway line. We can also confirm that our Client has delivered a number of successful developments adjacent to railway lines, including the West Coast Mainline, and is therefore well-versed in providing the necessary mitigation. We can therefore conclude that our Client's assessment of the potential yield of the Site, and the Illustrative Masterplan, already takes account of the necessary attenuation measures required to mitigate noise from the West Coast Mainline. ✓

Development Potential – conclusions

On the basis of the above conclusions, and those set out within the enclosed documents, including the Development Framework and Highways Appraisal, **we do not consider there to be a sound evidential basis for the Council's conclusions set out in Table 5.4 of the Green Belt Review.** There are no constraints to the Site's development that call into question its developability. On this basis, the Site's Stage 2B score should be categorised as 'good', thereby scoring 3 out of 3 under the Stage 3A ranking. } 4

Table 5.4 of the Green Belt Review concludes that the Site has strong defensible boundaries and is in a sustainable location. The enclosed Development Framework provides further evidence of the Site's sustainable location and its links to 2 x nearby railway stations, pedestrian linkages, shops and services and sources of employment. On this basis and having addressed the Council's conclusions in relation to developability, the Site should in fact score 6 out of 6 in the overall Green Belt Review assessment, placing it in Tier 1 in the tier ranking of overall scores. Whilst a score of 6 does not automatically mean that the Site should be allocated for housing, to do so would be consistent with the Council's approach to selecting site allocations set out within the Green Belt Review. ✓

Development Area

As highlighted above, the Council has reduced the overall Site area of Land East of Newlands Grange from 15.56 hectares to 9.76 hectares, between the Preferred Options and SDLP documents. This follows as assessment of the potential impact of the development of the Site upon the Vulcan Village Conservation Area, to the west of the Site. ✓

Table 5.4 of the Green Belt Review states that in response to the Preferred Options consultation, Historic England ("HE") expressed concerns about the impact that the development of the Site would have on the setting of the Conservation Area. As a result, the Council undertook a Heritage Impact Assessment ("HIA"), which concluded that the extent of any development would need to be limited to mitigate the impact upon the Conservation Area. This in turn resulted in a reduction in the Site area, which the Council considers to be justified in light of 'the need to address the issues raised by HE'. Having undertaken a review of HE's representations to the Preferred Options consultation (enclosed), we can confirm that the entire basis for the Council's review of this matter is completely false. The HE's representations make no reference whatsoever to our Client's Site. The Council's evidence base is therefore flawed in this respect and it can only be concluded that HE is in fact satisfied that the development of the full Site would *not* harm the setting of the Conservation Area. } 4 5 8

Notwithstanding the above, there is a need to address the Council's HIA, which we note is not included within the Council's evidence base subject of this consultation.

The HIA is in two parts, consisting of the HIA and HIA Addendum. The outcome of the HIA process, is to remove an arbitrary section of the Site, broadly parallel to the Conservation Area. We consider the process for concluding that this is the most appropriate way to address the presence of the Conservation Area, is flawed. At no point within the HIA, or HIA Addendum, does the Council consider whether an alternative approach to the Site's delivery could result in the preservation and enhancement of the Conservation Area's setting, relying on development management policies and a well-conceived design. } 5

Vulcan Village exists because it was constructed to house the workers and families of the adjacent former Vulcan Works. It was not constructed in this location due to its rural setting, or desire for "quietness", as inferred in the HIA. If the Vulcan Works had not been constructed, neither would the Village. We also question whether it would have been a quiet existence for its past residents,

given the proximity to the heavily industrialised foundry. With the Vulcan Works now gone, a main component of the Village's historical significance and setting has been lost. Furthermore, the replacement of the Vulcan Works with a modern housing development of circa 630 dwellings, wrapped tightly around the northern perimeter of the Village, has completely altered its setting to the extent that it is now part of suburban Newton-le-Willows. To therefore seek to avoid the development of a significant portion of our Client's Site on the basis of an alleged need to retain openness around the Village, is at odds with its established setting.

Notwithstanding this, the Village has a strongly landscaped eastern boundary, meaning that if our Client's Site were to be developed, it would maintain an internal sense of isolation in the Conservation Area – aside from the northern part of the Village, which is now consumed by modern housing. It is only on 'plan' view that there could potentially be any sense of encroachment.

The enclosed Development Framework includes at Figure 9 (Page 15) an Illustrative Masterplan. The Illustrative Masterplan was prepared having regard to the setting of the Vulcan Village Conservation Area. Alongside the strong visual boundary and containment already provided by the landscape, the Illustrative Masterplan shows a further heavily planted boundary, recreational route and public open space adjacent to the Conservation Area. The HIA makes no reference to the Development Framework or Illustrative Masterplan in order to assess the potential impact of future residential development at the Site. The HIA only considers a "no development" scenario, which in our opinion is overly simplistic and lacks vision and creativity. Allowing development closer to the Conservation Area, if designed appropriately, could better reveal, complement and enhance the character and appearance of the Conservation Area; however, such a scenario has not been tested in the Council's evidence base, which is a major flaw.

Enclosed with this letter of representation is a revised Concept Masterplan (Plan Ref: BW01 Rev V3). This version of the Concept Masterplan proposes a larger area of open space between the Conservation Area and housing development, demonstrating a further option for the Site's delivery. This version of the Concept Masterplan would yield approximately 260 dwellings, based on a density of 30 dwellings per hectare. The revised Concept Masterplan demonstrates that development is achievable throughout the full extent of the 15.56 hectare Site, without harm to the setting of the Conservation Area.

In conclusion on this matter, contrary to the Council's evidence base, and the Green Belt Review, HE has no objection to the extent of the Site as identified in the Preferred Options consultation document, and as promoted by our Client in the submitted Development Framework and enclosed revised Masterplan. The HIA fails to consider a range of potential approaches to addressing the impact of future development upon the setting of the Conservation Area, and only considers a 'no-development' scenario. Such a lack of option testing in our opinion is evidence of a lack of a thorough understanding of the Conservation Area's significance. A considered masterplan for the Site's development, as presented by our Client, clearly has the potential to make a more efficient use of land in a sustainable location, whilst at the same time protecting and enhancing the character and appearance of the Conservation Area. We therefore submit that the full extent of the Site that has been promoted by our Client should be reinstated, on the basis that **the evidence base behind the Council's decision to physically curtail the Site is inadequate and the associated conclusions are not justified.**

Exclusion of Council-owned Land

The exclusion of part of the Site from the Safeguarded Land allocation, as advocated in the HIA and as proposed in Table 5.4 of the Green Belt Review, includes the southern most part of the Site that is within the ownership of the Council. The exclusion of the Council's land is partly justified by the Council on the grounds of Conservation Area impact. We set out above why we believe that reasoning is flawed. In addition to this, Table 5.4 also states that the recreational ground 'would be unlikely to be developable in any event'. This conclusion is not justified within the Council's evidence base and there is no assessment provided as why it would not be 'developable'.

The fact that the recreational ground is within the ownership of the Council is not in itself a reason to conclude that it cannot be developed. In our Client's opinion, the recreational ground is under-

HIGHWAY
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utilised and is of poor quality, lacking dedicated car parking, leading to users having to park on the highway, and having no changing facilities. There is no known shortage of recreational facilities in Newton-le-Willows and informal discussions with the Council officers have revealed that the principle of releasing the land for housing has not been considered. The release of under-utilised Council-owned land for housing would be in accordance with Government initiatives encouraging Councils to make the most of such assets in contributing towards addressing the national housing crisis and releasing much needed capital for diversion into cash-starved public services.

We therefore conclude that the exclusion of the Council-owned land from the Site boundary is not sufficiently justified and we request that the Council takes the pro-active decision to reinstate the land.

Comments on Strategic Policies

Our Client supports the need for significant housing and employment growth and acknowledges the pragmatic approach by the Council in aiming to bring forward development which, at a minimum, seeks to meet the future residential and employment needs of the Borough and identifies additional land provision to provide flexibility in supply and beyond the Plan period. Our Client is concerned, however, the SDLP does not aim to support and deliver the wider aspirations of the Liverpool City Region ("LCR"), despite Paragraph 1.7.1 of the SDLP highlighting the extent to which the Council has a close working relationship with the wider LCR on strategic planning matters (including noting the preparation of the Spatial Development Strategy ("SDS")). As part of the evidence base for the LCR SDS the Liverpool City Region Combined Authority ("LCRCA") prepared a Strategic Housing and Employment Land Market Assessment 2017 ("SHELMA") which sought to assess the likely needs for housing and employment land across the LCR *as a whole*. We consider that a close alignment with the aspirations of the LCR is essential to help drive forward economic growth and reverse current trends of decline in deprivation and affordability within the Borough.

Policy LPA02 – Spatial Strategy

Our Client **supports** the SDLP's approach in identifying a number of Key Settlements, which includes Newton-le-Willows. We support the need for development to be focussed on these Key Settlements as the most sustainable locations to accommodate the levels of development required to meet needs and deliver economic growth. However, **we consider that this policy wording should be amended to specify that meeting development needs will necessitate development both in and around those Key Settlements.** This is because sufficient development cannot be located within existing settlement boundaries.

Our Client **supports** Paragraph 4 of Policy LPA02, which sets out that Green Belt release will be required to meet the development needs of the Borough over the Plan period and that further Green Belt land is required to be safeguarded to meet the needs of the Borough beyond the Plan period. We **support** the release of Green Belt land within the SDLP and the need for Safeguarded Land.

Policy LPA04 – A Strong and Sustainable Economy

We note at Paragraph 4.12.3 of the SDLP that the Council rightly acknowledges that the economy of the Borough is *'inextricably linked'* to that of the wider LCR. It is stated that the Council will continue to work alongside its City Region partners *'to take full advantage of the continued growth of the City Region and to help deliver the economic growth'*. However, in order to reflect the economic growth scenario supported in the SHELMA, a step change in proposed housing delivery is also required to reflect this, otherwise the Borough will not be able to fully contribute towards or take advantage of its position within the LCR.

Policy LPA05 – Meeting St Helens Borough’s Housing Needs

Housing Requirement

Policy LPA05 sets a housing requirement for the Borough, over the Plan period, of 486 dwellings per annum (“dpa”) (9,234 in total). This is a notable reduction from the Preferred Options document, which proposed 570 dpa.

The figure of 486 dpa is arrived at following the application of the Government’s Standard Methodology for calculating objectively assessed needs (“Standard OAN”) for housing. Whilst the SDLP rightly acknowledges that this is a starting point, and that the stated housing requirement incorporates an uplift from the Standard OAN by 18 dpa, it is not clear how this requirement has been arrived at and how it relates to the Council’s aspirations for economic growth. Our Client **objects** to the proposed housing requirement on the basis that it is **not adequately justified**.

As a starting point, our Client considers that a housing requirement of 860 dpa should be investigated by the Council. Such a housing requirement would be fully justified because it would align with the economic growth scenario set out in the SHELMA, to which, by the Council’s own admission, the economy of St Helens is inextricably linked. Without a significant uplift, **it cannot be concluded that the SDLP is positively prepared or effective**. In the event that the Council does not consider such a housing requirement to be deliverable, it should at least aim to deliver the St Helens Strategic Housing Market Assessment (January 2019) Update’s economic growth uplift requirement of 514 dpa.

Housing Distribution

With regard to the distribution of housing allocations under Policy LPA05, whilst we note there is broad alignment with Policy LPA02, in that housing allocations are principally located in and around the Key Settlements, there is no clear relationship between the distribution of housing and employment land. In the interests of sustainability, a *sound* development distribution strategy would see housing growth located in areas with good accessibility to the highest intensity of employment growth, and in the most sustainable settlements in terms of facilities and public transport connectivity (Paragraphs 102-104, NPPF).

In the case of Newton-le-Willows, the proposed Parkside East (7EA) and Parkside West (8EA) strategic employment land allocations (Policy LPA04.1) are directly to the east of the settlement and in combination will deliver in excess of 144 hectares of employment land (over 200 hectares when including the proposed Strategic Rail Freight Interchange). Clearly, the Council believes that Newton-le-Willows is a sustainable settlement that is capable of delivering such expansion, and rightly so given its public transport connections and range of existing facilities. However, despite this significant job growth in the area, the SDLP only proposes a single housing allocation for Newton-le-Willows (Ref: 7HA, for 181 dwellings). This is despite the fact that there are other available and deliverable sites on the edge of Newton-le-Willows, such as our Client’s Site. Land East of Newlands Grange is within walking and cycling distance of both Parkside West and Parkside East. The failure of the SDLP to align the distribution of employment and housing land allocations means that it runs contrary to the need to actively manage patterns of growth that support the objectives of sustainable development, and in particular sustainable transport (Paragraphs 102-104, NPPF). On this basis, **the SDLP is not sound; it is not positively prepared, is not justified and is not consistent with national policy**.

Housing Supply

Table 4.6 of the SDLP summarises the housing requirement and supply from 2016-2035. We note this is at odds with the Plan period of 2020-2035. Our first observation is that Table 4.6 will most likely be confusing to many people, having to refer to a number of footnotes in order understand the breakdown provided.

Table 4.6 places great reliance on the Council’s Strategic Housing Land Availability Assessment (“SHLAA”) to support its claimed level of supply. Whilst we have not forensically analysed the SHLAA

to ascertain whether the supply figure is robust, we do note that it has a base date of April 2017. In our Client's opinion this does not represent an up-to-date evidence base, particularly when bearing in mind that the Examination of the Local Plan is unlikely to take place until late 2019 at the earliest, at which point the SHLAA will be two and a half years old. Because of its age, it is unlikely that the SHLAA can be regarded as consistent with national planning policy because it does not appear to comply with the latest definition of 'deliverable' contained in Annex 2 of the 2019 NPPF. In light of the uncertainty that this has for the SDLP's claimed level of housing land supply, **it cannot be concluded that the SDLP is justified or consistent with national policy.**

Our Client wishes to emphasise the importance of ensuring a robust housing supply, in light of the fact the Housing Trajectory set out in Table 4.7 of the SDLP does not anticipate that allocated housing sites will contribute towards supply until 2022/2023.

Policy LPA06 – Safeguarded Land / Monitoring Framework

Our Client supports the SDLP's allocation of Safeguarded Land, to ensure a future supply of housing and employment land beyond the Plan period, notwithstanding that our Client considers that its land East of Newlands Grange, Newton-le-Willows should be allocated for housing now, for the reasons explained earlier in these representations.

Policy LPA06 states very clearly that proposals for housing or employment development on Safeguarded Land in the Plan period will be refused. Paragraph 2 of the Policy states that:

'Planning permission for the development of the safeguarded sites for the purposes identified in Tables 4.7 and 4.8 will only be granted following a future Local Plan review that proposes such development.' (emphasis added)

Appendix 4 of the SDLP sets out the Monitoring Framework for the Plan. For Policy LPA06, the Monitoring Framework proposes that an early Local Plan review will be considered in the event of:

'10% (or more) of land safeguarded granted planning consent for built development'

This monitoring and review scenario present a very confusing situation. 10% of Safeguarded housing land equates to at least 14.83 hectares, which is a minimum of 500-520 dwellings. It is difficult to foresee a situation where the Council would allow this to happen, when the development of Safeguarded Land within the Plan period (i.e. before any review) runs directly contrary to the policy concerned (LPA06). If the monitoring mechanism is to have any credibility, Policy LPA06 must be amended to clearly set out under what circumstances the Council will grant planning permission for development on Safeguarded Land. Without this clarity, Policy LPA06 **is not sound because it is not justified** and appropriately aligned to the monitoring and review mechanism of the Plan.

Summary of Representations

Our Client wishes to continue to pro-actively engage with the Council to assist in the Local Plan process. For the reasons set out within these representations, our Client does not consider that the Council's assessment of Land East of Newlands Grange, as set out within the Green Belt Review, is accurate and adequately justified. The evidence provided above and enclosed in the form of the highways Transport Representations Appraisal, Development Framework and updated Concept Masterplan, demonstrate that the Site as a whole (i.e. the full 15.56 hectares) is unconstrained and has good development potential and should therefore achieve the highest possible scoring in the Green Belt Review. In order for the SDLP to be considered sound, our Client considers it necessary for the Council to update the evidence base accordingly and adjust the extent of the Site's allocation. On the basis of the evidence that we put forward, we also consider that the Site should be allocated for housing in this Local Plan.

The need for further housing land allocations is highlighted further when it has become apparent that the SDLP does not seek to align with the economic growth aspirations of the LCR, which by the Council's own admission, is inextricably linked to St Helens. To align the SDLP with economic growth

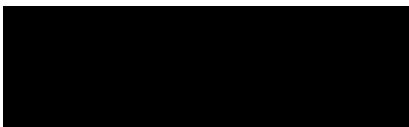
aspirations is likely to necessitate the allocation for further land for housing and our Client's sustainable Site is ideally placed to meet those housing needs.

The relationship between Policy LPA06 and the SDLP's Monitoring Framework is confusing. If the granting of planning permissions on Safeguarded Land within the Plan period will trigger the requirement to consider a Local Plan review, then policy LPA06 needs to make clear under what circumstances Policy LPA06 will permit the development of Safeguarded Land within the Plan period.] 7

On the basis of our comments within these representations, and as confirmed on the enclosed Representations Form, our Client wishes to participate at the oral part of the Local Plan Examination, in order to explore these issues further with the Council and Examination Inspector.

We trust that our Client's representations are of assistance to the Council in advancing its Local Plan, and we would welcome the opportunity to discuss the matters set out above in more detail with officers in order to help address our Client's concerns with respect to the soundness of the Plan.

Yours sincerely,



VINCENT RYAN

Director

Enclosures

Representations Form

Representations of Jones Homes to the Preferred Options Local Plan

Land East of Newlands Grange Development Framework

Land East Newlands Grange updated Concept Masterplan (BW01 Rev V3)

Transport Representations Appraisal by Focus Transport Planning

Historic England representations to the Preferred Options Local Plan

Representations Form



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

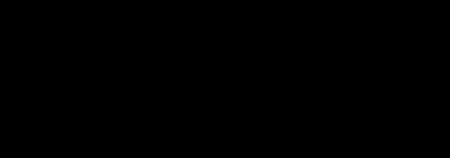
Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Vincent
Last Name:	Last Name: Ryan
Organisation/company: Jones Homes (North West) Ltd	Organisation/company: Barton Willmore
Address: c/o Agent	Address: Tower 12, 18/22 Bridge Street, Spinningfields, Manchester
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
Email:	

Signature: 	Date: <input type="text" value="13 March 2019"/>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	

RETURN DETAILS

Please return your completed form to us by no later than **5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA02	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

See separate document.

Please continue on a separate sheet if necessary

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3. To which part of the Local Plan does this representation relate?										
Policy	LPA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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Positively Prepared?	<input checked="" type="checkbox"/>
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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Green Belt Review 2018			

4

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

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Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Heritage Impact Assessment (inc HIA Addendum) for GBP_044 Land East of Newlands Grange (5)			

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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3. To which part of the Local Plan does this representation relate?										
Policy	LPA06	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

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Positively Prepared?	<input type="checkbox"/>
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Policy	Paragraph / diagram / table	Appendix 4 – Monitoring Framework	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)			7				

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Strategic Housing Land Availability Assessment 2017 <div style="text-align: center; font-size: 2em;">8</div>			

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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Representations of Jones Homes to the Preferred Options Local Plan

St Helens Local Plan: Preferred Options

Representations on Behalf of Jones Homes (North West) Ltd

January 2017

St Helens Local Plan: Preferred Options

Representations on behalf of Jones Homes (North West) Ltd

Project Ref:	27131/A3/LD/VR	27131/A3/LD/VR	27131/A3/LD/VR
Status:	Draft	Draft	FINAL
Issue/Rev:	01	02	03
Date:	24/01/2017	26/01/2017	27/01/2017
Prepared by:	LD	LD	LD
Checked by:	VR	VR	VR

Barton Willmore LLP
Tower 12,
18/22 Bridge St,
Spinningfields,
Manchester
M3 3BZ

Ref: 27131/A3/LD/VR

Date: January 2017

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Appendices

Appendix 1: Infographic Information

Appendix 2: Supporting Development Framework Document

1. INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore on behalf of Jones Homes (North West) Ltd (our "Client") in response to the recently published St Helens Local Plan (2018 – 2033) Preferred Options.
- 1.2 Once adopted, the new Local Plan will set out St Helens Council's ("the Council") Strategy for growth in relation to new jobs, homes and infrastructure in the Borough between 2018 and 2033, and the strategic and development management policies that will guide development throughout the Plan period. It will replace the adopted Core Strategy (2012) and the Saved Policies contained within the St Helens Unitary Development Plan ("UDP") (1998).
- 1.3 These representations are intended to assist the Council in ensuring that the new Local Plan meets the needs and development aspirations of the Borough. We also set out our Client's case for the allocation for housing of land under its control, to the East of Newlands Grange in Newton-Le-Willows, for circa 300 dwellings.
- 1.4 In addition to the comments that follow, Barton Willmore has prepared an Economic Benefits Infographic, which quantifies the positive economic impact of development at Land East of Newlands Grange, and a Development Framework Document, which demonstrates that the Site is deliverable.

Jones Homes

- 1.5 Our Client is one of the UK's leading housebuilders and currently builds over 600 homes a year, incorporating a range of high quality house types in highly desirable locations throughout the UK.
- 1.6 As the Council is aware, our Client is an active housebuilder within St Helens and has a number of land interests in the Borough, including Eccleston Grange, Eccleston and Newlands Grange, Newton-le-Willows, both of which are currently under-construction.
- 1.7 At the previous 'Call for Sites' exercise, our Client brought to the attention of the Council the availability of land adjacent to its existing development site at Newlands Grange, Newton-le-Willows, which is presently proposed for designation as a

“Safeguarded Site – Ref: HS14 – Land east of Newlands Grange, Newton-le-Willows” within the Preferred Options document.

- 1.8 These representations demonstrate that Land East of Newlands Grange is available, suitable and deliverable for release from the Green Belt as a residential allocation on the basis that it is a logical and sustainable continuation of the existing development site to the west, and will help meet the Council’s housing land requirement in the short and medium term.

- 1.9 As stated above, our Client seeks to work collaboratively with the Council to ensure that the emerging Local Plan can be found sound following Examination. We would welcome the opportunity to meet with officers to discuss these representations in more detail in due course.

2. PLAN PERIOD, SPATIAL VISION AND OBJECTIVES

Plan Period

- 2.1 The Preferred Strategy document identifies that the plan period for the emerging Local Plan is 2018 – 2033, a 15 year time period. This approach is supported by Paragraph 157 of the NPPF which encourages Local Plans to:

“be drawn up over an appropriate timescale, preferable a 15 year time horizon, taking account of longer term requirements, and be kept up-to-date”.

- 2.2 Whilst we support the approach by the Council to identify an appropriate plan period, we note that the evidence base which supports the Preferred Options Document refers to a period from 2014 – 2033, a 19 year period. The differences between the plan period and the evidence base risk adding complexity to the emerging Plan and may result in the potential for misunderstanding and misinterpretation and unnecessary complexity. For example, the housing requirement evidence base covers a period of 19 years between 2014 and 2033, whereas the plan period covers the period of 2018 – 2033. This may cause unnecessary confusion. We would suggest that the time period for the Local Plan is amended to 2014 – 2033 to reflect the evidence base period.

Vision

- 2.3 Our Client is generally supportive of the proposed Spatial Vision for St Helens. The Spatial Vision is consistent with national policy and will help to bring forward positive economic and social change. Our Client is encouraged by the pragmatic approach taken by the Council through the identified need for Green Belt land release to ensure that St Helens supports and delivers sufficient employment and housing growth across the Borough up to 2033 (and beyond).

Strategic Aims and Objectives

- 2.4 Our Client is generally supportive of the proposed Strategic Aims and Objectives to ensure that the Vision is achieved. However, we note that a number of the Strategic Aims are not consistent with national policy. These include Strategic Aim 1 (Objective 1.1) which gives:

"...priority to development of derelict and vacant sites". [emphasis added]

- 2.5 This approach is not consistent with national policy, because whilst Paragraph 17 of the NPPF is supportive of the effective use of land by reusing land which has been previously developed, it does not state that *priority* should be given to the development of previously development land ahead of greenfield land.
- 2.6 We also consider that Strategic Aim 4 (Objective 4.1) should be amended, to include reference to market *and* affordable homes.

3. STRATEGIC POLICIES

- 3.1 The Council has outlined a number of strategic policies within the Preferred Options Document. Our Client supports the need for significant housing and employment growth, and the pragmatic approach by the Council to bring forward development which at a minimum meets the future residential and employment needs within St Helens and identifies additional land provision to provide flexibility and supply. Notwithstanding this, we have a number of concerns with the Policies as drafted and set out these comments below:

Policy LPA01 – Presumption in favour of sustainable development

- 3.2 Our Client supports the inclusion of Policy LPA01 and the approach taken by the Council in relation to the presumption in favour of sustainable development. We consider it is essential for this policy to be included within the emerging Local Plan, and its inclusion demonstrates compliance with Paragraph 14 of the NPPF.

Policy LPA02 – Spatial Strategy

- 3.3 Our Client supports the Council's approach in identifying a number of Key Settlements, which includes Newton-le-Willows. We support the need for development to be located in and around these Key Settlements as the most sustainable locations to accommodate the levels of development required to meet needs and deliver economic growth.
- 3.4 The Council sets out its justification for Green Belt release in Paragraphs 4.11 - 4.27 of the Preferred Options document. The Council maintains that Green Belt release is required because it is recognised that the Green Belt has not been substantially altered since 1983 and there is a need for a comprehensive review of the Green Belt boundaries. This will ensure that sufficient land is allocated by the Council to meet the development needs for the Borough for both the plan period, and the subsequent 15 years post plan period (until 2048).
- 3.5 Our Client supports the Council's approach by the Council to release land from the Green Belt for housing (and employment uses) to ensure the needs of the Borough can be met in full within the Plan period and beyond. We consider this to be a pragmatic approach taken by the Council, and compliant with Paragraph 157 of the

NPPF which sets out the need to take account of longer term requirements of the Borough.

Policy LPA03 – Development Principles

- 3.6 We support the Council's aspirations for development to be guided by a number of development principles, and the need for the Council to address the challenges faced through population growth; economic well-being; contribution to inclusive communities; contribution to high quality and built environment; minimising the need to travel; and lowering St Helen's carbon footprint. ✓
- 3.7 Clarification is required with regard to the relationship between Policy LPA01, which outlines a presumption in favour of sustainable development, and Policy LPA03 which contains a number of development principles. This is to ensure that proposals which comply with the presumption in favour of sustainable development are not refused on the basis of development principles contained within Policy LPA03. ✓
- 3.8 We do not consider that schemes which comply with the presumption in favour of sustainable development as required by Policy LPA01, but do not fully comply with Policy LPA03, should be refused, particularly where it is beyond the scope of the development. ✓
- 3.9 For example - (Development Principle 6(e)) Ensuring that all new development addresses flood risk mitigation/adaption when the Site is not located within a flood risk area to achieve the policy requirements of Policies LPA01 and LPA03. Sufficient flexibility should be built into the wording of the policy to adapt to individual site circumstances. ✓

Policy LPA05 – Meeting St Helens' Housing Needs

- 3.10 Our Client supports the need for additional housing within St Helens and consider that it is evident throughout the Preferred Options that the Council is currently unable to meet its full housing needs without Green Belt release. Our Client supports the need for Green Belt release. (2)
- 3.11 Policy LPA05 identifies a requirement of 10,830 dwellings from 2014 – 2033, which equates to an average requirement of 570 dwellings. This is the same requirement as set out within the Core Strategy (2012). We refer the Council to our earlier comments ✓

in Paragraphs 2.1 – 2.2 regarding the difference between the proposed plan period and the evidence base period used to inform the housing need requirement.

- 3.12 Paragraph 47 of the NPPF requires local planning authorities to **“boost significantly the supply of housing”** and in doing so local planning authorities must ensure that their Local Plans meet the **“full objectively assessed needs for market and affordable housing in the housing market area”**. Local Planning Authorities are required to prepare a Strategic Housing Market Assessment (“SHMA”) that identifies the scale and mix of housing, and the range of tenures which are required over the plan period¹.
- 3.13 The Mid Mersey SHMA (prepared by GL Hearn) was published in January 2016 on behalf of Halton, St Helens and Warrington Councils. The SHMA identifies a requirement of 1,756 dwellings per annum (“dpa”), of which 451 dpa are required within St Helens. This equates to a difference of 119 dpa within the Preferred Option approach.
- 3.14 The Council has sought to justify this proposed increase of the housing requirement in Paragraphs 4.96 – 4.103 of the Preferred Options document. This includes:
- The housing requirement period is 1 April 2014 – 31 March 2033 because this is the base date of the St Helen’s SHMA.
 - The target takes account of over/under supply since 2014 and estimated completions up to 2018.
 - It meets the full objectively assessed needs of the Borough; incorporates an uplift of over 20% from the objectively assessed needs to take account of the Borough’s ambitions and increasing population; makes an allowance for more housing choice; allows for significant economic growth; and reflects the high levels of house building prior experienced before and after the 2008/09 recession.
 - It applies an additional requirement of 29 dpa in addition to the 20% uplift to accommodate demolitions.
 - It is the same figure as the housing target of 570 dpa set by the St Helen’s Core Strategy.
 - A growth approach is deemed to be appropriate to meet the development and economic growth plans and is considered realistic.

¹ NPPF, Paragraph 159

3.15 The Council has also undertaken an assessment of discounted options, which include:

- 1) Housing requirement target of 451 dpa (2014 – 2033). This was rejected on the basis that it would not reflect the Borough's growth ambitions, or significant economic growth.
- 2) Housing requirement target of 712 dpa, 25% above the Preferred Options and Core Strategy. This was rejected on the basis that it is more than the local market housing and infrastructure could absorb and result in unsustainable patterns of growth.
- 3) Housing requirement target of 912 dpa, 60% above the Preferred Options and current Core Strategy. This was rejected on the basis that it is more than the local market housing and infrastructure could absorb and result in unsustainable patterns of growth.
- 4) Stepped housing target of 451 dpa, in the first 5 years, and then increasing to 630 dpa from 2018 – 2033. This was rejected as there was no evidence that phasing is necessary.

3.16 The Council's main justification for pursuing a figure of 570 dpa over the other options is that it reflects the Borough's ambitions, and allows for housing choice and economic growth.

3.17 It is quite right that the Council pursues an ambitious growth target that is clearly deliverable. However, we strongly encourage the Council to enhance its evidence base used to support the proposed figure of 570 dwellings to justify the departure from the Mid-Mersey SHMA.

3.18 Further evidence is required to support the Council's assumptions outlined in Paragraph 4.101 to confirm how the proposed increase from 451 dpa to 570 dpa takes account of the Borough's ambitions to stabilise and increase the population whilst at the same allowing for more choice and competition, significant economic growth, and reflects the levels of housebuilding achieved in recent years. In its current form, we are concerned that insufficient justification has been provided.

3.19 Enhancing the evidence base to support the figure of 570 dpa will ensure there is robust evidence to justify and support the proposed housing requirement. This will

demonstrate that the Council's aspirations of boosting the population and economic growth in accordance with Paragraph 47 of the NPPF are met. ✓

3.20 This will in turn ensure the Plan is justified, effective, consistent with national policy and has been positively prepared in accordance with Paragraph 182 of the NPPF. ✓

3.21 We also note that Paragraph 4.99 of the Preferred Options document identifies that the Liverpool City Region SHELMA is due to be published in the first half of 2017. The Council has confirmed that the emerging Local Plan will take account of the SHELMA findings where relevant. ✓

3.22 We consider that it is essential that the Council demonstrates how the calculation of the proposed housing requirement takes into account the conclusions of the emerging SHELMA and its associated evidence base if required. If there is a departure from SHELMA, necessary justification should be provided. This is to ensure that the Council is able to demonstrate that the emerging Local Plan housing requirement is appropriately justified. ✓

Other Considerations

3.23 Phasing – Paragraph 4 of Policy LPA05 seeks to introduce phasing of the development of allocated and non-allocated housing sites at the planning application stage if infrastructure is required to be improved to cope with development. ✓

3.24 In terms of allocated sites in the Local Plan, the Council should fully understand the infrastructure requirements of the Sites which they are allocating, both individually and cumulatively, and set out clearly in the Plan how this infrastructure will be delivered and within what timescales. This is to ensure that the trajectory of delivering against the housing requirement is clear and transparent, and is understood and acceptable by all parties. ✓

3.25 Density – Paragraph 5 of Policy LPA05 seeks to introduce minimum densities of between 30 – 50 dph; depending on the location of development. We consider that densities should be applied on a site-by-site basis to reflect the character of the site and area, rather than being stipulated through policy. This approach is supported by the NPPF (Paragraph 47) which states that Local Authorities should set their own approach to housing density to reflect local circumstances. ✓

- 3.26 Whilst we acknowledge that the Policy does allow for lesser densities in certain circumstances, the appropriate policy approach should simply to require that developments make the most efficient use of land whilst ensuring that development is of the highest quality. ✓
- 3.27 Housing Delivery – We support the Council’s pragmatic approach to monitoring the housing land supply as set out in Paragraph 6 of Policy LPA05. This approach is to ensure that an adequate supply of housing comes forward within the Borough and a 5 year housing land supply is maintained. ✓
- 3.28 The Council has set out an approach whereby **“where housing delivery is significantly below the anticipated level for a significant period of time [our emphasis], reasons for under-delivery will be investigated and if delivery is due to a significant lack of land supply, a partial or full plan review will be considered [our emphasis] to allocate Safeguarded sites for housing development”**. ✓
- 3.29 We welcome the inclusion of this mechanism for the Council to undertake a partial or full review of the Local Plan in relation to the release of allocated safeguarded sites. This will ensure that the Council’s housing land requirements are met across the Plan period and beyond. However, clarification is required as to what is meant by **“considered”** and what constitutes **“significantly below the anticipated level for a significant period of time”**. This will provide greater certainty to the developer or landowner in relation to the circumstances in which safeguarded sites will be considered for release from the safeguarding allocations. ✓

Policy LPA06 – Extent of the Green Belt and Safeguarded Land

- 3.30 We support the need for Green Belt release within St Helens to ensure that the needs of the Borough are met in full. (6) ✓
- 3.31 Paragraph 4 of Policy LPA06 identifies the Safeguarded sites, which are proposed for removal from the Green Belt by the emerging Plan, but are protected during the plan period and are intended to meet longer term development needs. Planning permission for the development of these safeguarded sites will only be granted if a Local Plan review finds it necessary. ✓

- 3.32 As set out in our comments in relation to Policy LPA05, further clarification is required in relation to the circumstances in which a Local Plan review will occur, provided to provide certainty to landowners and developers. Please refer to our comments in Paragraphs 3.28 - 3.30. ✓
- 3.33 Paragraph 4 of Policy LPA06 identifies the Safeguarded sites, which are proposed for removal from the Green Belt by the emerging Plan, but are protected during the plan period and are intended to meet longer term development needs. Planning permission for the development of these safeguarded sites will only be granted if a Local Plan review finds it necessary. As set out in our comments in relation to Policy LPA05, further clarification is required in relation to the circumstances in which a Local Plan review will occur, provided to provide certainty to landowners and developers. Please refer to our comments in Paragraphs 3.27 -3.30. ✓
- 3.34 Paragraph 4.132 of the Preferred Options document states that sites have been allocated as Safeguarded because other development sites are considered to be **“more suitable, are likely to be available sooner, would need to be developed before the safeguarded sites could be accessed or provide a better distribution of development when taken as a whole”²**. ✓
- 3.35 Our Client’s Site at “Land east of Newlands Grange” (Ref: HS14) is under their control, with the exception of the route of the proposed access, which is within the Council’s control and is also safeguarded. The Site is suitable, available and deliverable within the first half of the Plan period. It represents a logical extension to an existing development site and the land parcel in question makes only a weak contribution to Green Belt purposes. On this basis, and by the Council’s own reasoning, our Client’s Site should be released from its Green Belt designation and allocated for housing, rather than safeguarded for potential release beyond the Plan period. This is discussed further in Section 4 of this Representation. ✓

Policy LPA08 – Infrastructure Delivery and Funding

- 3.36 Our Client understands the necessity for developer contributions to help secure on-site or off-site infrastructure provision where this is necessary to make development acceptable in planning terms. However, the wording of this policy needs to be clarified ✓

² Preferred Options Paragraph 4.132

because it does not make sufficiently clear the circumstances in which certain contributions will be sought.

- 3.37 The hierarchy approach identified within Policy LPA08 sets out situations where financial contributions are required. These include i) contributions essential for public safety or minimum acceptable level of design; ii) necessary to address local infrastructure requirements; iii) any remaining contributions; and iv) contributions encouraged by planning policies. We do not consider this approach to be fully justified.
- 3.38 We consider it to be unnecessary to take this approach, because any required financial contributions can be dealt with by way of a Section 106 or CIL contribution. We do however support the policy allowance for viability assessments to be submitted with planning applications to establish the required level of developer contributions if certain provisions are not made.

Policy LPC01 – Housing Mix

- 3.39 Our Client is supportive of the Policy's intention to seek provision of a wide range of affordable and market housing to meet local housing need. Notwithstanding this, we do not support the inclusion of a policy which places an arbitrary requirement on developments to deliver 5% of the market housing mix as bungalows.
- 3.40 The apparent need for bungalows is derived from comments received by estate agents as identified within the Mid Mersey SHMA (2016), which concludes that "**providing an element of bungalows should be given strong consideration on appropriate sites**"³. It does not stipulate that this is required, rather it is a recommendation. No justification has been provided by the Council as to why an arbitrary requirement figure of 5% for bungalow provision has been sought. This figure is not appropriately justified, nor has it been viability tested.
- 3.41 The SHMA also concludes that providing significant numbers of bungalows will have cost implications due to the plot size required. We do not support the inclusion of bungalows as a policy requirement, rather it should be an aspiration, if practically possible and if appropriate for the locality. Each proposed site and development should be considered on its own merits, particularly because some sites may not be suitable for the provision of bungalows.

³ Mid Mersey SHMA Paragraph 10.29

- 3.42 Paragraph 3 of Policy LPC01 also requires that 20% of all dwellings should be designed to Lifetime Homes Standard. We object to this requirement. It is overly onerous on developers to provide this as standard and no evidence has been provided to support this requirement. ✓

Policy LPC02 – Affordable Housing Provision

- 3.43 Our Client is supportive of the provision of affordable housing within developments, when in accordance with the recent Government Ministerial Statement which requires the provision of affordable housing on sites of over 10 dwellings. ✓

- 3.44 Notwithstanding this, whilst we are generally supportive of the provision of 30% affordable housing, it remains unclear how the Council has arrived at the percentage of affordable housing provision required. ✓

- 3.45 The Council has also sought to designate Affordable Housing Zones (Zones 1 -4) within the emerging Local Plan. This appears to be solely based on geographical disparities identified early in the Local Plan process. Clarification is required as to how these have been derived and the basis for the viability evidence base this is from. ✓

- 3.46 Policy LPC02 states that a minimum of 30% of affordable housing will be required on Greenfield sites within Affordable Housing Zones 2, 3 and 4 is required, however, this policy seeks to include a caveat which allows for viability assessments to be submitted to justify any relaxation of affordable housing provision. We support this approach. ✓

4. SITE SPECIFIC COMMENTS - LAND EAST OF NEWLANDS GRANGE

- 4.1 Our Client's Site at "Land east of Newlands Grange", Newton-le-Willows, is proposed to be allocated as a "Safeguarded Site" (Ref: HS14) within the Preferred Options document and has been assessed as capable of accommodating 291 dwellings. ✓
- 4.2 The Site is available, deliverable and suitable for housing now and should be allocated as a Site for residential development of circa 300 dwellings within the emerging Local Plan rather than as a safeguarded site. ✓
- 4.3 A Promotional Document is appended in support of the case for allocation (Appendix 3). The document provides an assessment of the Site, its context and its development potential. It identifies that the Site is available, suitable and offers a suitable location to help the Council meet its future development needs. ✓

Background

- 4.4 The Site is located to the south east of Newton-le-Willows. Emerging Policy LPA02 – Spatial Strategy identifies Newton-le-Willows as a Key Settlement and **"the largest distinct Key Settlement after the Core Area, it contains the Town Centre of Earlestown, known for its markets and the Local Centre of Newton"**⁴. The Site is therefore a sustainable location. ✓
- 4.5 The Site is located to the east of Newlands Grange, Newton-le-Willows, which is the former Vulcan Works Site. As the Council is aware, outline planning permission for the entire Vulcan Works Site for residential development, live/work development, local centre, recreational area, sports club and open space together with associated infrastructure was originally obtained in 2003 by St Modwen (Ref: P/2003/1461). This was followed by a reserved matters approval in 2010 (Ref: P/2010/003), obtained by our Client for 138 dwellings, and reserved matters approval on behalf of Persimmon Homes for 208 dwellings in 2012 (Ref: P/2012/0290). Since that time, there have been variations and discharge of conditions decisions relating to the original permission and subsequent reserved matters permissions. ✓

⁴ Page 16, Preferred Options

4.6 Both Jones Homes and Persimmon Homes are currently on-site and nearing completion of their respective development phases. Both sites have experienced strong sales rates; in the case of our Client this has been between 25-30 units per annum. ✓

4.7 As stated above, the land to the east, subject of this representation, was promoted by our Client as part of the recent "Call for Sites" on 10 March 2016. ✓

Site Location

4.8 The Site is bounded to the west by a strip of vegetation and woodland and beyond this is the former Vulcan Works site described above. To the south is a parcel of land which whilst vacant, is used as a sports pitch and owned by St Helens Council. Beyond this is Newton Brook. To the east of the Site is the West Coast Mainline Railway line and to the north is agricultural land and public amenity land including Newton-le-Willows Cemetery. ✓

Site Description

4.9 The Site is approximately 15.6 ha in size and comprises primarily arable agricultural land, and a Council owned sports pitch to the south of the Site. ✓

Local Plan Allocation

4.10 The Site is currently within the designated Green Belt according to the adopted Core Strategy and UDP. ✓

Council's Green Belt Assessment

4.11 The Council has undertaken a Green Belt Assessment of the Site (Ref: GBS_067) which concludes that the Site is "**well contained and of low significance**". (4) ✓

4.12 The Council has assessed the Site against the 5 purposes of the Green Belt as required by Paragraph 80 of the NPPF, and it has been concluded that it will have a "low" impact on the Green Belt if it were developed. We support this conclusion and consider, when assessed against the purposes of the Green Belt, the Site makes a weak to no contribution to the 5 purposes of the Green Belt.

- **Unrestricted Urban Sprawl** - The site is well contained, and surrounded by residential development to the west and the railway line to the east which form boundaries to the Site, which mean that the Site will not result in unrestricted urban sprawl.

- **Merging of Settlements** -The Site is located adjacent to an existing residential development, and given the boundary line of the existing development and railway line. This will ensure that there is no merging of the settlement with Winwick and Hermitage Green (located to the east of the Site). Both these settlements are located 1.7km and 1.9km respectively.
- **Safeguarding the Countryside from Encroachment** - The Site is bounded by existing housing development, vegetation and railway line. Whilst there are views beyond the railway line, these views are limited in nature and the railway line will act as a natural boundary to the Site. Whilst development of the Site will encroach into the countryside, it is limited, well-defined and falls within strong defensible boundaries preventing future encroachment. This will ensure that the countryside is safeguarded from encroachment in respect of the wider Green Belt function.
- **Setting and Character of Historic Towns** – Whilst the Vulcan Village Conservation Area is located adjacent to the western boundary of the Site, the Site itself is not located within a Conservation Area. There will be no impact in terms of maintaining the setting and character of the towns, and it is not a material consideration to fulfil this Green Belt purpose.
- **Urban Regeneration** - The Site is located adjacent to an existing brownfield development site, and would form a natural extension to the Site. There is insufficient land available within St Helens to meet the Borough's housing requirements without the release of Green Belt land. The release of the Site will not conflict with this purpose of the Green Belt and will assist in bringing forward much needed housing, including affordable housing, in the early part of the Plan period.

4.13 It is therefore concluded that having regard to the above comments and the Council's Green Belt assessment of the Site, the release of our Client's Site for housing will result in a low impact on the wider Green Belt and its purposes, and its release is justified.

4.14 We also note from the Council's assessment of sites, other sites which have been similarly considered to have a low/weak impact have been released from the Green Belt due to their limited contribution to the five purposes of the Green Belt. We trust that the additional information provided in this representation demonstrates the deliverability of the site and justifies a similar conclusion.

Other Considerations

- 4.15 In addition to the above consideration, the Council has identified within its Green Belt Assessment that the Site provides **“some landscape value and lacks good accessibility”**. Notwithstanding this, the Council concludes it is suitable for release from the Green Belt and safeguarded for future development. ✓
- 4.16 The accompanying Promotional Document (prepared by Barton Willmore) and incorporated Masterplan (prepared by MCK Associates) clearly demonstrates that the Site is well contained because it is bounded by the railway line to the east, and residential development to the west. This railway line provides a natural boundary to the Site and any impact on landscape is limited and can be appropriately landscaped where necessary. ✓
- 4.17 The Council has concluded that the Site lacks access to public transport and facilities. However, as part of the outline permission associated with the adjacent Vulcan Works a local centre was required to be provided. Planning permission for a convenience foodstore was obtained through Planning Permission Ref: 2012/0371. Works have been completed in part, with the construction of a new Sports Pavilion which includes a bowling green, indoor rifle range, MUGA and sports pitches (completed in Summer 2016). It is anticipated that the foodstore (Aldi) will open in Summer 2017. ✓
- 4.18 A series of improvements to the route to the station, and to the station itself have also been proposed as part of the adjacent Vulcan Works Site. This will help to promote commuting by train to and from Newton-le-Willows and to improve the sustainability of the area. This in turn will help to improve the attractiveness of Newton-le-Willows, Earlestown and the surrounding area and supports the wider Townscape Heritage Bid and aspirations for Earlestown, which our Client has been actively supporting. ✓
- 4.19 Two strategic employment sites are also proposed to the east of Newton-le-Willows (Ref: EA8 – Parkside East, and Ref: EA9 – Parkside West), which will provide approximately 144 ha of land for employment uses; including a Strategic Rail Freight Interchange. This will bring significant employment opportunities to Newton-le-Willows over the plan period. ✓
- 4.20 There are only 3 proposed housing allocations within Newton-le-Willows in the Preferred Options document – Ref: HA7 (Land between Vista Road and Ashton Road, Newton-le-Willows) for 350 dwellings; Ref: HA12 (Former Newton Community ✓

Hospital, Winwick Road, Newton-le-Willows) for 20 dwellings; and Ref: HA13 (Former Red Bank Community Home, Winwick Road, Newton-le-Willows) for 150 dwellings. ✓

- 4.21 Only one of these sites Ref: HA13 is located near to the proposed employment areas. Further housing land release on land such as our Client's Site East of Newlands Grange, will ensure that there is an appropriate proportion of housing growth to align with such large-scale employment growth. This will help support the Council's growth aspirations in relation to housing and employment uses; ensuring that they are aligned and delivered sustainably. ✓
- 4.22 It is envisaged that by the time the Local Plan is adopted (2018), the final stage of the existing site at Vulcan Works will be complete or near completion. It is therefore appropriate for the adjacent Site (Land east of Newlands Grange) to be released, because it will act as an extension, or next phase, of development. ✓
- 4.23 Clearly having an existing workforce and sales team on-site (at Vulcan Works), it is a logical approach to allocate the Site. This will allow the developer to enter into a new phase of development, rather than remobilising the workforce later on in the process. ✓
- 4.24 The Site is located in close proximity to a range of education and transport linkages, with bus stops located within 100m and 400m of the Site, providing a range of bus services to Warrington and St Helens. Both the Newton-le-Willows and Earlestown Train station are located within 2km of the Site and provide connectivity to the wider area. Additionally, there are no public right of ways located on the Site, however, there are opportunities to provide connections to existing public right of ways and pedestrian and cycle routes located to the north of the Site as explored within the accompanying Promotional Document. ✓
- 4.25 In terms of access, our Client has undertaken some preliminary transport investigation which concludes that access to the Site could be obtained via either the St Modwen land to the west or the Council owned land to the south. The accompanying masterplan and Promotional Document demonstrate that accessing the Site via the land to the south is the preferred option which our Client would progress. ✓
- 4.26 Initial ecology assessments have also been undertaken, and conclude that there is potential for badgers and bats and that suitable mitigation measures can be derived as part of any future development of the Site to avoid a harmful impact and provide net gains in biodiversity. ✓

4.27 In terms of ownership, the Site is located within two ownerships (Jones Homes (North West) Ltd, and St Helens Council), and is capable of delivering 300 dwellings. The Site is capable of being delivered in full within the first 10 years of the plan period at a rate of 25- 30 dwellings per annum. This is based on our Client's experience on the adjacent Site. ✓

Summary

4.28 Based on the above assessment, we consider that the Site makes a very limited contribution to the Green Belt. The Site is well contained and of low significance in terms of Green Belt. This position is accepted by the Council. It is considered that the access constraints identified can be readily overcome, and that it is a sustainable Site, which will be further enhanced upon completion of the adjacent Vulcan Works Site. ✓

4.29 The Site is a logical continuation of the existing development site to the west. It is envisaged that by the time the Local Plan is adopted (2018), the final stage of the existing site at Vulcan Works will be complete or near completion. It is therefore appropriate for the adjacent Site (Land east of Newlands Grange) to be released, because it will act as an extension, or next phase, of development. In turn, this will help meet the Council's land requirement with the first half of the plan period. ✓

4.30 It is our consideration that because the Site is available, suitable and deliverable within the plan period it should be released from its current Safeguarded Site designation and allocated as a proposed housing site for 300 dwellings. ✓

5. CONCLUSIONS

- 5.1 These representations have been prepared by Barton Wilmore on behalf of our Client, Jones Homes (North West) Ltd. ✓
- 5.2 Our Client is generally supportive of the emerging Local Plan, and is encouraged by the pragmatic approach taken by the Council through the identified need for Green Belt release to ensure that St Helens supports and delivers sufficient employment and housing growth across the Borough up to 2033 (and beyond). ✓
- 5.3 We do however have a number of concerns with the Preferred Options as drafted. These include:
- The plan period should be amended to 2014 – 2033 to reflect the evidence base which supports the Local Plan.
 - Further justification is required to support the evidence base for the Council's proposed OAN of 570 dpa.
 - A review of the OAN may be is required in light of the Liverpool City Region SHELMA.
 - Clarification is required in relation to the mechanism of the Local Plan Review in relation to the release of Safeguarded Sites.
 - The requirement for 5% bungalow provision is not sufficiently justified or derived from a sound evidence base.

Site Specific

- 5.4 Our Client also seeks to promote their existing land interests at Land east of Newlands Grange, Newton-le-Willows, which is under their control. The Site is currently proposed as a "Safeguarded Site" however, it is our view that it is suitable for allocation as a residential Site for circa 300 dwellings. ✓
- 5.5 An Economic Benefits Infographic which quantifies the positive economic impact of development at Land East of Newlands Grange, and a Promotional Document which demonstrates that the Site is deliverable have been prepared and accompany the submission. ✓
- 5.6 The Economic Benefits Infographic demonstrates that the development of the Site will deliver: ✓

- New Homes Bonus of £1,5m over a 4 year period;
- Generate £0.54m per annum in council tax payments;
- Total leisure and retail expenditure generated by scheme is £5.2m per annum;
- 84 direct construction jobs, plus an additional 59 additional indirect jobs;
- GVA over the construction phase of £45.7m;
- Provide accommodation for 333 economically active people;
- Household growth of 6,051 households between 2018 -2033; and
- 4,000 new jobs between 2018 – 2033.

5.7 The Site makes a limited contribution to the Green Belt. It is well contained and of low significance in terms of Green Belt. This position is accepted by the Council. It is considered that the access constraints identified can be readily overcome, and that it is a sustainable Site, which will be further enhanced upon completion of the adjacent Vulcan Works Site.

5.8 The Site is a logical continuation of the existing development site to the west. It is envisaged that by the time the Local Plan is adopted (2018), the final stage of the existing site at Vulcan Works will be complete or near completion. It is therefore appropriate for the adjacent Site (Land east of Newlands Grange) to be released, because it will act as an extension, or next phase, of development. In turn, this will help meet the Council's land requirement with the first half of the plan period.

5.9 Two strategic employment sites are also proposed to the east of Newton-le-Willows (Ref: EA8 – Parkside East, and EA9 – Parkside West), which will provide approximately 144 ha of land for employment uses; including a Strategic Rail Freight Interchange. This will bring significant employment opportunities to Newton-le-Willows over the plan period.

5.10 The number of proposed housing allocations within Newton-le-Willows in the Preferred Options document are limited, with only Ref: HA13 (Former Red Bank Community Home, Winwick Road, Newton-le-Willows) for 150 dwellings located near to the proposed employment areas.

5.11 Further housing land release on land such as our Client's Site East of Newlands Grange, will ensure that there is an appropriate proportion of housing growth to align with such large-scale employment growth. This will help support the Council's growth aspirations in relation to housing and employment uses; ensuring that they are aligned and delivered sustainably.

- 5.12 The Site should be released from its current Safeguarded Site designation and released for allocation for a proposed housing site for 300 dwellings. ✓
- 5.13 We welcome the opportunity to meet with officers to discuss these representations in more detail in due course. ✓

Land East of Newlands Grange Development Framework

LAND EAST OF NEWLANDS GRANGE NEWTON-LE-WILLOWS ST HELENS

DEVELOPMENT
FRAMEWORK (V2)

MAY 2018

**BARTON
WILLMORE**

**JONES
HOMES**

ABOUT JONES HOMES

As one of the UK's leading home builders, we've been creating beautiful new homes in highly desirable residential locations since 1959.

As the founding member of The Emerson Group, a private, family-owned property development company based in Cheshire, we also have regional offices in Kent, Yorkshire and Lancashire. The group owns and manages a commercial property portfolio worth in excess of £1 billion.

Currently building more than 600 homes a year in the UK, we offer an impressive portfolio of apartments, mews and townhouse residences, as well as spacious detached homes. We have a robust record of delivering successful developments in St. Helens. Recent housing schemes include:

- Newlands Grange: located directly to the west of the Site and providing a total of 153 units;
- Eccleston Grange: comprising of 283 units a mix of detached, mews and apartments; and

- The former Carmelite Monastery comprising of 12 large detached properties commencing on site.

Orbit Developments, part of The Emerson Group, have completed a local centre at Eccleston Grange, comprising a Sainsburys Local, vets, Subway and 5 other retail units along with delivering Linkway West, a 67,602sq.ft leisure and retail development in the centre of St Helens comprising an Aldi, Costa Coffee, Frankie and Bennys, family entertainment/bowling alley and a Home Bargains which is near completion. These developments represent a £12.5 million investment across the local area.

The company is well versed in restoration projects, converting many listed buildings and has diversified into the retirement homes sector.

We have forged an enviable reputation for delivering excellent customer service and have received many prestigious accolades over the years for the properties we built, the design and landscaping of our developments as well as our talented team.

We work hard to maintain traditional values yet as a company we continually adapts to the changing needs of our customers. Through listening to buyers and researching new products. We are able to deliver the latest luxury accommodation focusing on quality, appearance, layout and style.





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EXECUTIVE SUMMARY

This Development Framework has been prepared by Barton Willmore on behalf of Jones Homes (North West) Ltd. It demonstrates that land east of Newlands Grange, Newton-le-Willows, St Helens (the Site) represents a sustainable solution to deliver new family and affordable homes to contribute to the future housing requirements of St Helens.

St Helens Council is currently preparing its new Local Plan which will set out planning policies and development sites to guide future development in the Borough. The Council acknowledges that greenfield land will be required to meet future development needs and Newton-le-Willows is identified as one of the key locations for growth during the plan period.

The Site is located to the south east of Newton-le-Willows; a highly sustainable town situated c.6km to the east of St Helens and c.7km to the north of Warrington. The Site has the potential to deliver residential development in a highly sustainable location within walking and cycling distance of two railway stations on the Manchester-Liverpool Railway Line, a range of shopping and leisure facilities and existing and emerging employment locations.

This document includes an initial assessment of the Site and its surroundings which has been undertaken by Barton Willmore (Planning & Masterplanning), Axis (Highways) and CES Ecology (Ecology). This has informed an emerging Concept Masterplan and supporting design principles to demonstrate our Client's emerging design rationale for the Site. In doing so, we demonstrate the ability of the Site to accommodate approximately c.300 dwellings, alongside, improved pedestrian and cycle links and public open space.

Jones Homes has a track record of delivering high quality developments in St. Helens; including at the recently completed Newlands, Grange to the west of the Site. Jones Homes has a desire to bring the Site forward for development at the earliest opportunity, to be delivered in full within the emerging Local Plan period.



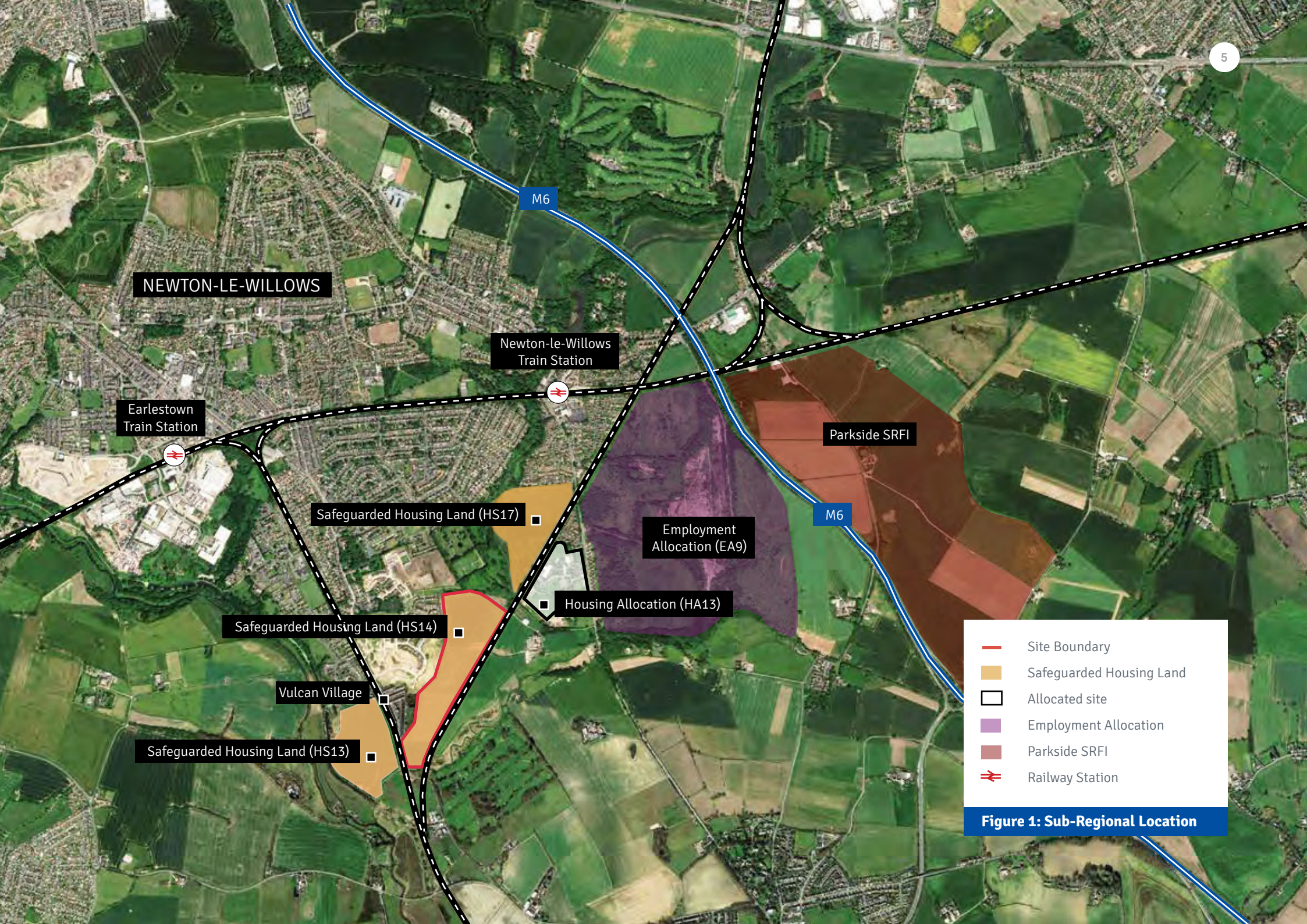


Figure 1: Sub-Regional Location

SITE LOCATION AND DESCRIPTION

LOCATION

The Site is located to the south east of Newton-le-Willows, which is a highly sustainable town in the administrative area of St Helens Council. It is proposed as a key settlement within the emerging local plan.

Newton-le-Willows is located between the cities of Liverpool and Manchester, some 24km from each.

St Helens is approximately 6km to the west of Newton-le-Willows, Warrington is approximately 7km to the south and Wigan approximately 11km to the north.

Newton-le-Willows Town Centre is c.1.5km from the Site and provides a range of services and facilities including Earlestown Train Station and the recently upgraded Newton-le-Willows Station and Interchange. Approximately 2km to the east of the Site is the M6 and approximately 2.5km to the south is the M62.

The Site was proposed as a Safeguarded Housing Site (Ref: HS14) within the Local Plan Preferred Options consultation document and was assessed as capable of accommodating 291 dwellings.



Figure 2: Site Location

DESCRIPTION

The Site is approximately 15.6ha in size and comprises arable agricultural land and a small area of Council owned land currently being utilised as a sports pitch.

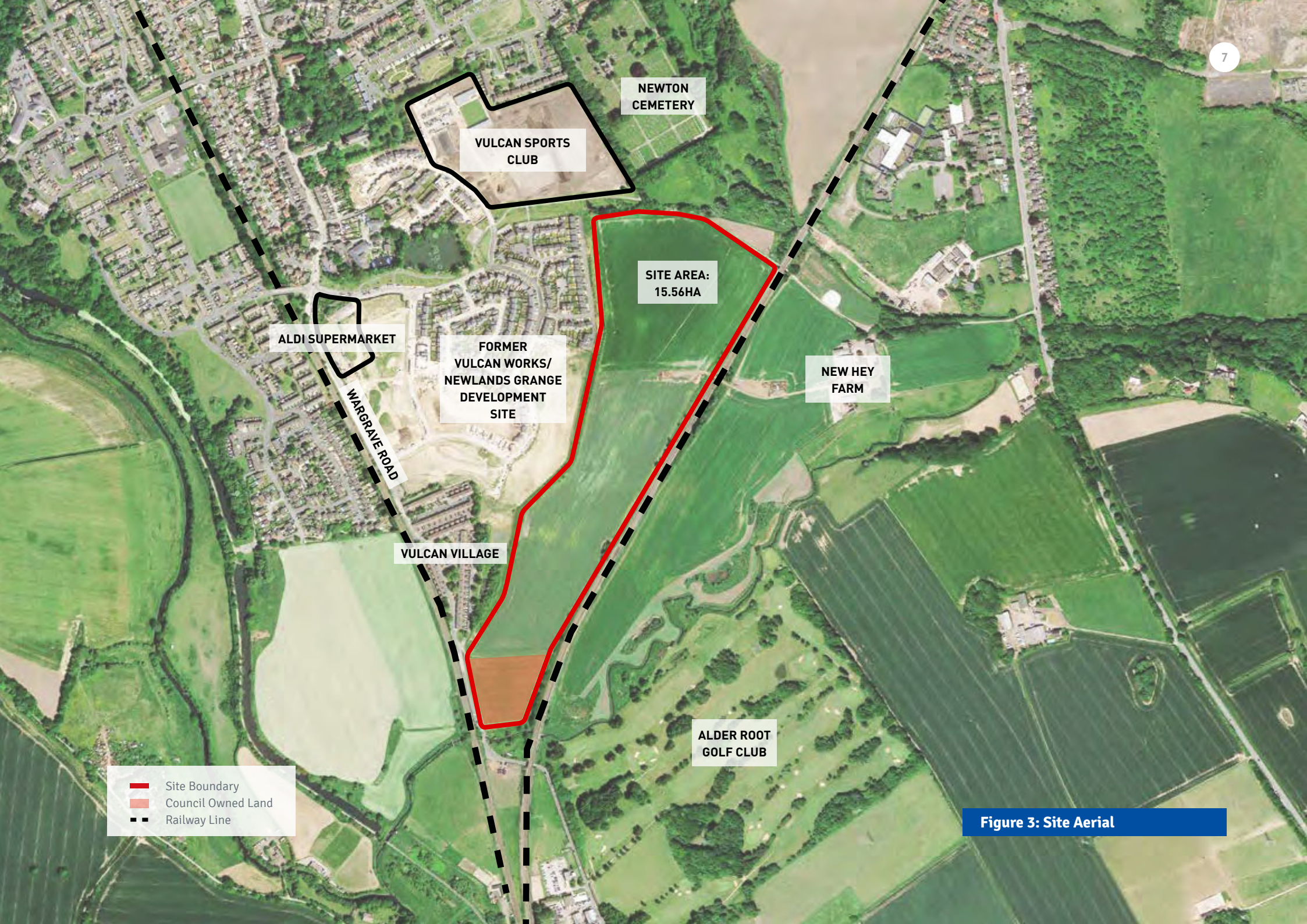
To the south of the Site, beyond the sports pitch, lies an existing watercourse known as Newton Brook. Beyond which is Alder Root Golf Club and agricultural land.

The eastern most boundary of the Site is bounded by the West Coast Mainline Railway, which provides a robust defensible boundary to define the proposed development of the Site. Beyond this are farm buildings associated with New Hey Farm and open agricultural fields. The farm buildings are accessed via a farm track which crosses the Site and bridges the railway line.

To the west of the Site lies Vulcan Village; a cluster of 19th Century workers cottages which are located within the Vulcan Village Conservation Area. To the north of the Conservation Area is Newlands Grange residential development, which has been developed by St Modwen, Jones Homes and Persimmon Homes. This development sits on the Vulcan Works site (a former locomotive factory) and includes a range of new homes and a new Aldi supermarket. A strip of scrub vegetation and woodland runs the length of the western boundary between the Site and the Newlands Grange development. Vehicle access to the Site can be secured from this boundary.

Wargrave Road runs to the west of the Site and provides a further potential point of vehicle access.

North of the Site lies Newton Cemetery and Vulcan Sports Club, which includes a bowling green, indoor rifle range, multi-use games area, sports pitches and car park. Beyond which lies existing residential development and the wider settlement of Newton-le-Willows.



NEWTON CEMETERY

VULCAN SPORTS CLUB

SITE AREA: 15.56HA

ALDI SUPERMARKET

FORMER VULCAN WORKS/ NEWLANDS GRANGE DEVELOPMENT SITE

NEW HEY FARM

WARGRAVE ROAD

VULCAN VILLAGE

ALDER ROOT GOLF CLUB

- Site Boundary
- Council Owned Land
- - - Railway Line

Figure 3: Site Aerial

NEIGHBOURHOOD ASSESSMENT

The Site is in a sustainable location at the urban edge of Newton-le-Willows with existing and potential links to key infrastructure.

The emerging Local Plan Spatial Strategy identifies Newton-le-Willows as the largest Key Settlement after the Core Area of St Helens. Accordingly, existing and future residents benefit from excellent strategic road connectivity, public transport opportunities and a good range of services and facilities across Newton-le-Willows.

This section highlights the Site's sustainable credentials through demonstrating that a significant proportion of facilities and public transport opportunities are within a convenient and safe walking and cycling distance from the Site.

FACILITIES

Local residents can enjoy access to a range of services and amenities within comfortable walking and cycling distance from the Site. These include, but are not limited to:

- Aldi Supermarket
- Vulcan Sports Club (inc. bowling green, indoor rifle range, multi-use games area, sports pitches and car park)
- Wargrave House School
- Red Bank School
- Wargrave C of E Primary School
- Alder Root Golf Course
- The Vulcan Inn

- Wargrave Inn
- Emmanuel Parish Church
- St Davids Catholic Church
- Newton Community Hospital
- Alexandra Care Home
- Trees Community Centre
- Newton-le-Willows Train Station
- Earlestown Train Station

Across the wider area, and within Newton-le-Willows Town Centre there are a number of services and facilities, including bank(s), pub(s), restaurant(s), cafe(s), beauty salon(s) and hairdresser(s), a dental and doctors practice, pharmacy, and a post office.

EMPLOYMENT

The Site is located c.800m to the east of an existing employment site accessed off Earle Street. This c.10ha site is occupied by light industrial employment uses and logistic operations, such as H&M Distributions.

To the east of the Site and accessible via an existing PRoW is a large employment allocation (EA9) and Parkside Strategic Rail Freight Interchange (SRFI), which is a proposed modern logistics hub and employment park centred on the derelict Parkside Colliery.

A planning application was submitted for Phase 1 of the Parkside SRFI in January 2018. This first phase of the scheme could create both construction jobs and up to 1,300 new permanent jobs with potentially thousands of jobs in future phases.

SUSTAINABLE TRANSPORT

The Site has access to public transport in the form of existing bus stops at Vulcan Village (c.100m from the Site) and Wargrave Road (c.400m from the Site). Services from these stops provide hourly connections to Warrington, Newton-le-Willows and St Helens. Additional bus services can be found within Newton-le-Willows Town Centre.

Newton-le-Willows Station and Interchange, and Earlestown Train Station area located within 2km of the Site and are accessible by existing bus services. Together, these stations provide rail connectivity across the north west region with connections to St Helens, Warrington, Liverpool and Manchester.

Newton-le-Willows train station has recently undergone a multi-million pound upgrade, including a new entrance and ticket office, bus interchange, car park and improved waiting facilities. The Site is ideally located to benefit from this excellent interchange facility.

WALKING AND CYCLING CONNECTIONS TO THE SURROUNDING NEIGHBOURHOOD

Existing Public Rights of Way (PRoW) located to the north of the Site, provide pedestrian and cycle connectivity to the following destinations:

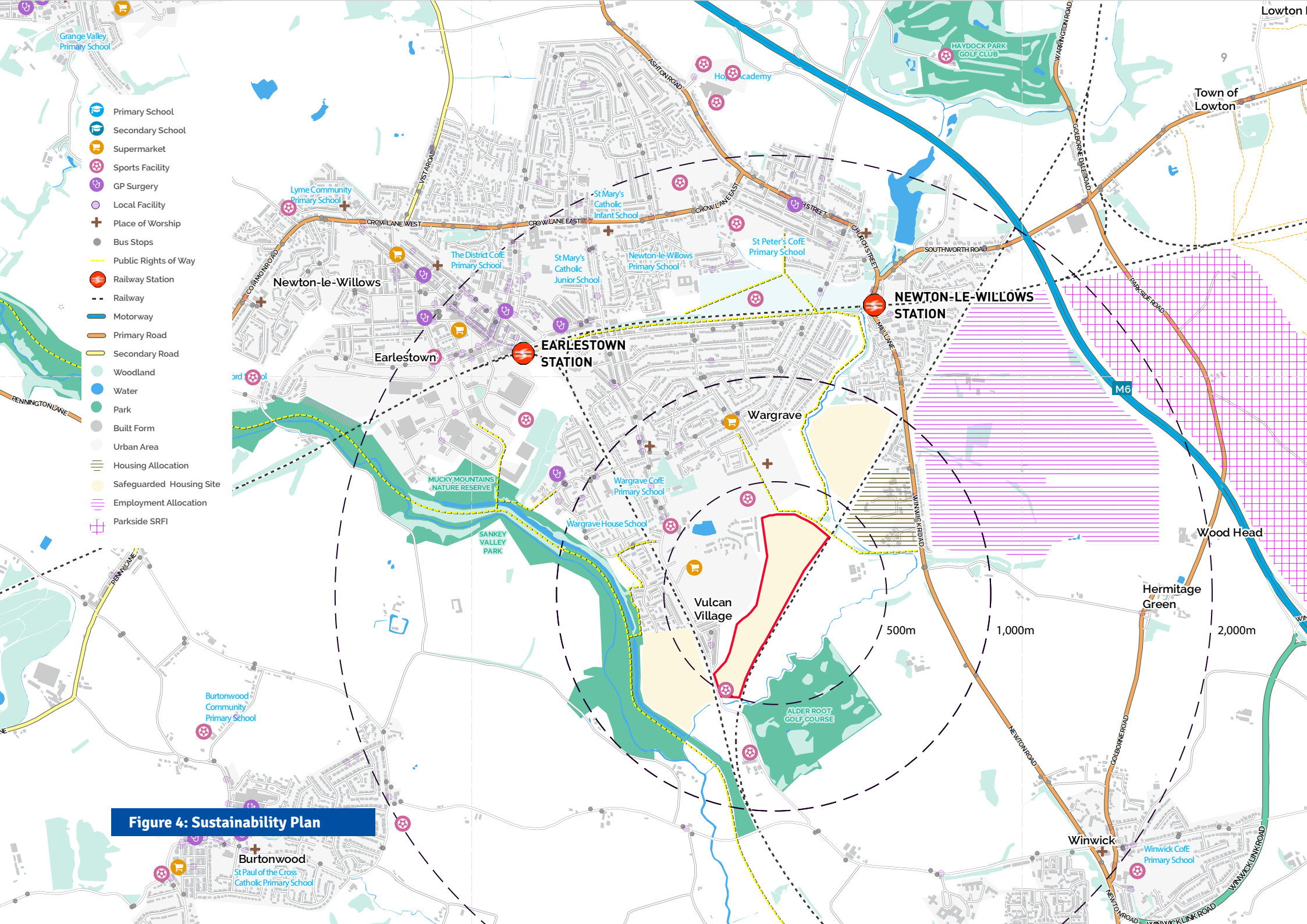
- Town Centre;
- Newton-le-Willows Train Station;
- Earlestown Train Station;
- Under the West Coast Mainline towards proposed employment allocation EA9 and Parkside SRFI to the east; and
- Towards Newlands Grange residential development to the west, which includes a range of local amenities.

In addition to PRoWs there is a pedestrian and cycle route connecting the northern boundary of the Site to Vulcan Park Way (a residential street).

GREEN CONNECTIONS

Additional PRoWs to the south-west of the Site provide pedestrian and cycle connections along the Sankey Canal and within the Sankey Valley Park.

The proximity of these routes provides opportunities for pedestrian and cycle connectivity to recreational opportunities within the wider open countryside.



- Primary School
- Secondary School
- Supermarket
- Sports Facility
- GP Surgery
- Local Facility
- Place of Worship
- Bus Stops
- Public Rights of Way
- Railway Station
- Railway
- Motorway
- Primary Road
- Secondary Road
- Woodland
- Water
- Park
- Built Form
- Urban Area
- Housing Allocation
- Safeguarded Housing Site
- Employment Allocation
- Parkside SRFI

Figure 4: Sustainability Plan

SITE ASSESSMENT

This section provides a summary of the initial observations and the findings of preliminary assessment work.

This assessment has been informed by an Access Appraisal (Axis) and an Ecology Assessment (CES Ecology).

VEHICLE ACCESS

Preliminary transport investigation have been undertaken which conclude that vehicle access to the Site can be obtained via either Newlands Grange and/or Wargrave Road.

Given the size of the Site, two vehicle access points would generally be required. An alternative solution and in accordance with St Helens design standards would be to serve the development from one vehicle access point and provide an internal loop road.

Detailed access drawings are provided within Appendix A.

PEDESTRIAN ACCESS

There are no PRow located within the Site. However, there are opportunities to provide connections to existing PRow and pedestrian/cycle routes located to the north of the Site.

LANDSCAPE FEATURES

Resulting from the Site's long standing agricultural use, the internal Site area is largely devoid of any significant landscape features. The Site boundaries are defined by hawthorn hedgerows, shrub landscape

and interspersed broad leaf trees. Where possible, these landscape features will be retained and enhanced with replacements provided to compensate for any losses.

ARBORICULTURAL SURVEY

An arboricultural survey has been undertaken and identified a number of trees to be retained as part of the proposed development.

ECOLOGY

An initial ecology assessment has been undertaken by CES Ecology (see Appendix B - Extended Phase 1, Habitat Map) and concludes there is potential for badgers and bats foraging along the railway line. More generally, the Site is considered to have relatively low ecological value, and limited suitable habitats for protected species. Notwithstanding this, the proposed development provides the opportunity to integrate any features of value in to a landscape framework capable of supporting and enhancing biodiversity through the provision of species rich planting.

RAILWAY LINE

An existing railway line bounds the eastern boundary of the Site. The proposed development will need to provide a suitable no-development easement alongside this feature.

TOPOGRAPHY

The Site sits at 15m AOD toward the south and rises to 30m AOD along the eastern edge where a track bridges the railway line. It then drops to 20m AOD along the northern part of the Site.

FLOOD RISK AND DRAINAGE

The entirety of the Site lies outwith Flood Zones 2 and 3 of the Environment Agency's indicative Flood Map which means that it is considered to have a low risk of flooding.

An existing watercourse known as Newton Brook is located to the south of the Site. This provides a potential drainage destination for surface water run off resulting from the proposed development. However, further investigations will be necessary to understand how Site drainage can be achieved via an appropriately designed Sustainable Urban Drainage System (SuDs).

HERITAGE

A former Roman Road bisects the Site east to west, and Vulcan Village Conservation Area is located adjacent to the western boundary of the Site.

The proposed development will need to respect the character and setting of the Conservation Area and respond to the route of the Roman Road through careful placement of development and public open space.

VULCAN WORKS

The site of the former Vulcan Works is located to the west of the Site (now largely within residential use). During its operating years, the Works produced thousands of steam locomotives for use on railways all over the world. During WW2 the foundry focussed on making Matilda tanks, returning to locomotives in 1943. In later years the factory ceased making full locomotives and instead specialised in the production of large diesel engines. The foundry was closed in 2002.

The Newton-le-Willocks Heritage Trail and Health Walk passes the former Vulcan Works and the northern boundary of the Site (via an existing PRow shown on the plan opposite). The proposed development provides the potential to deliver heritage interpretation features relating to the Vulcan Works within the Site and adjacent to the Heritage Trail.

NEW HEY FARM

New Hey Farm is located to the east of the Site beyond the West Coast Mainline Railway Line. Farm vehicle access is secured to the farm via a farm track which crosses the Site and bridges the railway line. Continued farm access will be addressed as part of the Site's proposed development.



**FORMER
VULCAN WORKS/
NEWLANDS GRANGE
DEVELOPMENT
SITE**

**NEW HEY
FARM**

SANKY CANAL

WARGRAVE ROAD

NEWTON ROAD (A49)

NEWTON BROOK

- █ Site Boundary
- █ Watercourse / Drainage Ditch
- PRow
- █ Safeguarded/Allocated Housing Site
- ▲ Potential Vehicle Access
- █ Risk of Flooding
- Roman Road
- Farm Access
- █ Vulcan Village Conservation Area

Figure 5: Site Assessment Plan

20 AOD

25 AOD

30 AOD

15 AOD

VISION

Our vision for the Site is to deliver a residential development which provides high quality homes and excellent standards of urban design, whilst making a valuable contribution towards the existing and future community through:

- Provision of high quality market and affordable homes of varying types, sizes and densities to meet local housing need.
- Creation of an attractive and high quality residential neighbourhood which responds positively to its landscape and urban context.
- Integration and enhancement of existing green infrastructure.
- Creation of an integrated and accessible movement network which provides connections to the surrounding area.
- Delivery of imaginatively designed homes with gardens which have easy access to a range of amenities including children's play and landscaped green space.
- Respect of the neighbouring Vulcan Village Conservation Area.



Figure 6: Illustration View



Figure 8: Birds-eye Skecth (V1)

DESIGN PRINCIPLES

DEVELOPMENT QUANTUM

Taking into account the location of the Site and the density of existing residential development, **an average density of 30 dwellings per net hectare** has initially been applied. This provides the potential to deliver in region of **300 dwellings**.

The proposed density allows for the creation of a sustainable and balanced residential development, comprising a mix of housing types, sizes and tenures.

DESIGN PRINCIPLES

- 01 Primary vehicular access to the development is proposed via Wargrave Road.
- 02 Secondary vehicle access points from surrounding residential streets.
- 03 Development will be set back from the Vulcan Village Conservation Area and the proposed houses will include architectural details and materials that positively respond to this heritage asset.
- 04 Heritage interpretation will be provided on the Site adjacent to the Newton-le-Willows Heritage Trail and Health Walk.
- 05 An estate road extends into the Site from Wargrave Road, beyond which is a hierarchy of secondary streets and tertiary lanes.
- 06 A series of focal point spaces are dispersed within the Illustrative Masterplan. These spaces are designed to be distinctive and legible, assisting navigation from one area of the development to another.
- 07 New pedestrian footpaths are proposed to join with the surrounding residential areas, including an informal footpath and landscaped corridor to the south the Site.
- 08 The layout of new dwellings will be designed to achieve natural surveillance of all new routes and public realm.
- 09 Use of best practice block-structure principles, will provide outward facing housing frontages which securely enclose rear garden spaces and achieve natural surveillance of streets and public green space.
- 10 The Illustrative Masterplan makes provision for children's play.
- 11 Landscape themes will define character areas and routes within the development including street trees, grassed verges and hedgerows.
- 12 Provision of a no development easement and landscape buffer adjacent to the railway line, reflective of previous Jones Homes developments located adjacent to the West Coast Mainline where proposed landscape buffers are reflective of noise and vibration assessments undertaken at these locations.





Vulcan Sports Club

Aldi Supermarket

Wargrave Road







-  Estate Road
-  Potential Pedestrian/ Cycle Routes
-  Potential Vehicle Access (see Appendix)
-  Potential Secondary Vehicle Access
-  Potential SuDS
-  Potential Play Area

Figure 9: Illustrative Masterplan

DELIVERABILITY

JONES HOMES

Jones Homes has a track record of planning and delivering successful housing developments across St. Helens. Recent Jones Homes developments in St. Helens include:

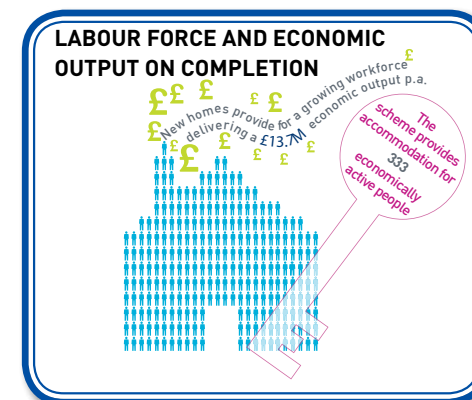
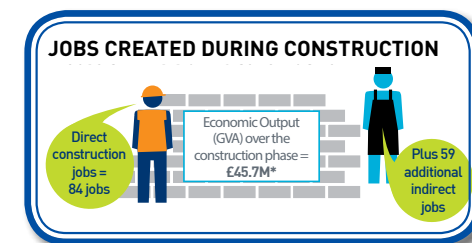
- **Newlands Grange** - Total of 153 units (complete).
- **Eccleston Grange** - Total of 283 units comprised of a mix of detached, mews and apartments (near completion).
- **Former Carmelite Monastery** - 12 large detached properties (just commenced construction on site).

Jones Homes St. Helens developments have proved very popular with Newlands Grange, experiencing sales rates of c.40 dwellings per annum.

If the Site is allocated for development through the Local Plan, an application for planning permission would be submitted at the earliest opportunity and it is realistic to assume completion rates at c.40 dwellings per annum.

TIMESCALES FROM DATE OF PLANNING PERMISSION	INDICATIVE DELIVERY PROGRAMME
Approval to be agreed with the LPA	Within 3 months of the adoption of the Local Plan
3-6 months from planning approval	Site Preparation
6-12 months from planning approval	20 units built
12 months – 2 years from planning approval	60 units built
2 years – 3 years from planning approval	100 units built
3 years – 4 years from planning approval	140 units built
4 years – 5 years from planning approval	180 units built
5 years – 6 years from planning approval	220 units built
6 years – 7 years from planning approval	260 units built
7 years – 8 years from planning approval	Up to 300 units built
All units to be delivered within 8 years from receipt of planning permission	

Table 1 : Housing Delivery Timescale





Welcome to
Eccleston Grange
Sales & Information Centre



BENEFITS AND CONCLUSION

ECONOMIC, SOCIAL AND ENVIRONMENTAL BENEFITS

The Site represents an available, suitable and sustainable site to be released from the Green Belt, and regard should be had to the following benefits that it could deliver:

Economic Role

- The proposed development will secure a number of economic and fiscal benefits in terms of job creation (direct and indirect) through construction.
- The proposed development will provide for increased expenditure in the local economy which will support the continued vitality and vibrancy of existing nearby services and facilities.
- The proposed development will help serve potential employment allocations located to the north east of the Site.
- Jones Homes seek to employ local contractors where possible. There are 7 local firms based in the St. Helens area on Jones Homes' list of approved contractors.
- The proposed development will generate over £1.5m of New Homes Bonus payments over a 4 year period and generate around £0.54m per annum in council tax payments (see Appendix C).

Social Role

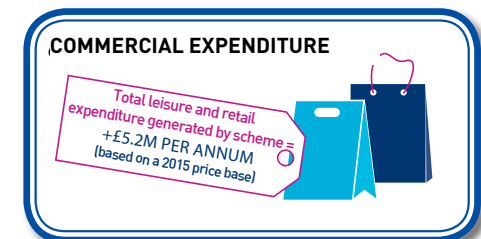
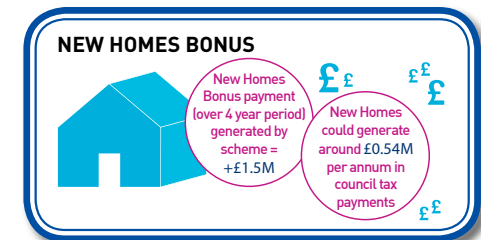
- The Site has the potential to deliver a high-quality new residential led development of approximately 300 dwellings. These will make a valuable contribution towards meeting the full objectively assessed housing needs of St Helens.
- The Site has the potential to deliver affordable housing at a level compliant with Local Plan policy to help meet both local and borough-wide needs.
- Housing provided on the Site will be well-integrated with its surroundings, including Newlands Grange, Vulcan Village and the wider settlement.
- The Site occupies a sustainable location for development, with easy access to a range of services within walking distance of the Site.
- The Site has potential to secure safe and sufficient vehicular access from Newlands Grange and Wargrave Road, without unacceptable impact on the local highway network.
- The Site has the potential to provide high quality public open space and play areas to encourage social interaction in a safe environment.

- There is an opportunity to create integrated pedestrian and cycle linkages as part of the Site's development, consistent with emerging local plan strategies, encouraging alternative modes of transport to private car, contributing towards a low-carbon economy, and providing improved access to nearby sources of recreation.
- The proposed development will be an opportunity to reflect the heritage of the surrounding area and provide education on the importance and history of Vulcan Works.

Environmental Role

- The Site has the potential to accommodate a residential development without having an adverse impact on local landscape character.
- The proposed development will be set within a strong landscape framework which will assist in absorbing the proposed development into the surrounding landscape character.
- The Illustrative Masterplan for the Site has taken full account of local landscape and nature conservation interests.

- The proposed development will retain existing landscape features, including mature trees and hedgerows, and this will be strengthened through the implementation of new soft landscaping at the edges of and within the Site.
- The Site is well served by existing bus routes, and is nearby to high quality rail links offering sustainable connections to the nearby cities, including Liverpool and Manchester.





CONCLUSION

This Development Framework has undertaken an assessment of the Site, its context and its development potential. In doing so, it has been demonstrated that there are planning and design reasons for the Site to be allocated within the new Local Plan for housing.

The Site is available and offers a suitable location to help the Council meet its future development needs.

Next Steps

The Site is considered deliverable from early in the plan period and our Client is committed to progressing the emerging Illustrative Masterplan towards a high quality residential development that responds to the local housing need, whilst taking into account and reflecting the character of the surrounding settlement.

We look forward to working with the Council to progress the proposals for the Site and welcome any feedback and/or the opportunity to meet and discuss the Site's potential further.

APPENDIX



Appendix B: Extended Phase 1, Habitat Map



300 DWELLINGS, NEWLANDS GRANGE, NEWTON-LE-WILLOWS

The NPPF sets out three dimensions to sustainable development, these being economic, social and environmental.

In its economic role, the planning system is required "to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and by identifying and coordinating development requirements, including the provision of infrastructure" [para 7, NPPF].

The NPPF confirms that pursuing sustainable development involves seeking positive improvements to people's quality of life, including:

- Making it easier for jobs to be created in cities, towns and villages; and
- Improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes.

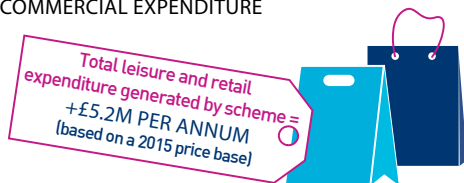
**BARTON
WILLMORE**

WWW.BARTONWILLMORE.CO.UK

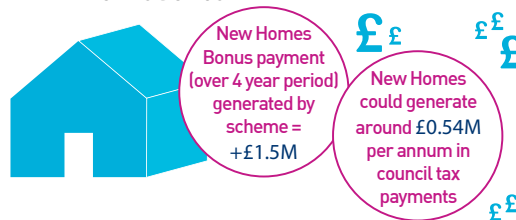
ECONOMIC BENEFITS OF PROPOSED SCHEME

The following summary highlights the substantial net positive impact that the proposed scheme will have on the local economy, which is entirely consistent with NPPF policy.

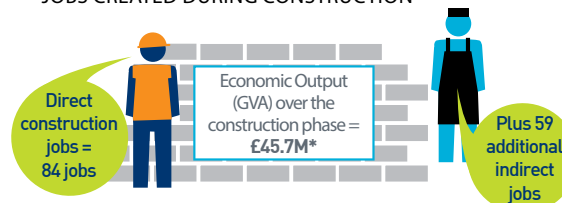
COMMERCIAL EXPENDITURE



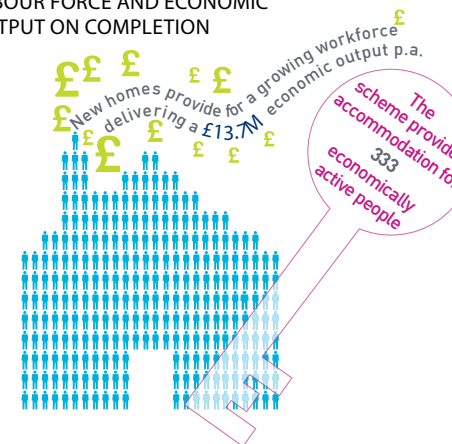
NEW HOMES BONUS



JOBS CREATED DURING CONSTRUCTION



LABOUR FORCE AND ECONOMIC OUTPUT ON COMPLETION



ECONOMIC PROFILE

Household Growth IN THE LOCAL AUTHORITY BETWEEN 2018 - 2033

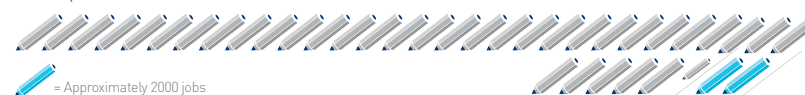
Source: CLG 2014-based Household Projections



6,051 households between 2018-2033

Employment Profile JOB GROWTH IN THE LOCAL AUTHORITY BETWEEN 2011-2031

Source: Experian

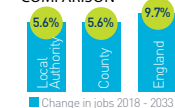


4,000 jobs between 2018-2033

HOUSEHOLD GROWTH COMPARISON



JOB GROWTH COMPARISON



Tower 12
18/22 Bridge Street
Spinningfields
Manchester
M3 3BZ

www.bartonwillmore.co.uk

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CAMBRIDGE
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EBBSFLEET
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LEEDS
LONDON
MANCHESTER
NEWCASTLE
READING
SOLIHULL

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Barton Willmore**

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Land East Newlands Grange updated Concept Masterplan (BW01 Rev V3)

- Site Boundary
- - - Potential Estate Road
- ... Potential Pedestrian/ Cycle Routes
- Potential Vehicle Access
- ➔ Potential Secondary Vehicle Access
- ✳ Potential SuDS
- ✳ Potential Play Area

DEVELOPMENT QUANTUM

Taking into account the location of the Site and the density of existing residential development, an average density of 30 dwellings per net hectare has initially been applied. This provides the potential to deliver in region of 260 dwellings.

The proposed density allows for the creation of a sustainable and balanced residential development, comprising a mix of housing types, sizes and tenures.



- 1 Primary vehicular access to the development is proposed via Wargrave Road.
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Project
 Land East of Newlands Grange
 Newton-le-Willows
 Drawing Title
 Concept Masterplan

Date	Scale	Drawn by	Check by
12.03.19	1:2000@A2	SW	VR
Project No	Drawing No	Revision	
27131	BW01	V3	

Transport Representations Appraisal by Focus Transport Planning

J000088-TREPS01a
March 2019

Land East of Newlands Grange (Former
Vulcan Works) and West of West Coast
Mainline

Newton-le-Willows

Transport Representations Appraisal

Prepared on behalf of:



Jones Homes (NW) Ltd.



Suite 3, Pentland House,
Village Way, Wilmslow,
SK9 2GH
Company no: 11465973

www.focustp.co.uk

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FIGURES

Figure TREPS1	Site Location - 2.0km Walk Catchment
Figure TREPS2	Site Location - 5.0km Cycle Catchment
Figure TRESP3	Local Cycle Infrastructure
Figure TREPS4	Bus / Rail Infrastructure Plan
Figure TREPS5	Local Bus Services
Figure TREPS6	Local Accident History - Q1 2014-Q3 2018

APPENDICES

Appendix TREPS1	Safeguarded Site 4HS - Local Plan Extract
Appendix TREPS2	Illustrative Masterplan of Representation Site

1.0 INTRODUCTION

1.1 Overview

- 1.1.1 This document has been prepared by Focus Transport Planning (Focus TP) on behalf of Jones Homes (North West) Limited (hereafter referred to as Jones Homes) in respect of representations made in support of the candidate site 4HS (Representation Site) that currently forms part of the draft allocation for housing in the St. Helens Borough Local Plan 2020-2035 Submission Draft (January 2019).
- 1.1.2 This document specifically focusses on the transport related aspects of these representations and, in particular, any key highways issues which are most likely to directly affect the consideration of development at the Representation Site.
- 1.1.3 The draft allocation site 4HS comprises land to the east of Newlands Grange (the former Vulcan Works site) and to the west of the West Coast Mainline (WCML), in Newton-le-Willows. In its supporting Green Belt Review (December 2018) St. Helens Borough Council (SHBC) has identified that the Representation Site (referred to as GBP_044 in the Green Belt Review) lies in ***“a sustainable location, within walking distance of local convenience facilities and public transport facilities.”*** However, the review also notes that the highway network within the surrounding area has a number of constraints, most notably Alder Root Lane to the south, and that such issues are likely to prove difficult to fully address. It goes on to note that ***“further work on the surrounding highway network is likely to be required before the extent of development potential within the parcel can be confirmed.”***
- 1.1.4 The purpose of these representations is to appraise the Local Planning and Highway Authority, St. Helens Borough Council (SHBC), of the anticipated highway and transport related aspects associated with the potential future development of the 4HS draft allocation site.

2.0 SITE LOCATION & EXISTING CONDITIONS

2.1 Site Location

2.1.1 The location of the Representation Site is illustrated in **Figure TREPS1** to this report. This plan identifies the strategic location of the Site in relation to the M6, the A49 Winwick Road, and the A572 Crow Lane West, as well as the main town centre of Newton-le-Willows. **Appendix TREPS1** to this report includes a more detailed location plan as well as the site-specific details for the draft allocation site, as extracted from the Local Plan Appendix 7 Site Profiles - Safeguarded Employment and Housing Sites. **Appendix TREPS2** provides an illustrative masterplan of the site's potential development, and includes for an additional area of Council-owned land to the south, which includes for front access on to Wargrave Road.

2.2 Description of Site & Local Network

Existing Site Conditions

2.2.1 The Representation Site is bounded immediately to the west by a strip of scrub vegetation and woodland which runs in a broadly NW-SE alignment, beyond which lies the Newlands Grange residential development (the former Vulcan works site). To the immediate east of the Representation Site lies the West Coast Mainline.

2.2.2 Access to the existing Newlands Grange development site is taken via two locations on to the mainline route of Wargrave Road, the main one of which (Vulcan Park Way) forms a 4-arm signalised crossroads junction with the residential distributor route of Bradlegh Road. The second access takes the form of a priority-controlled give-way T-junction towards the southern end of the St. Modwen site's frontage with Wargrave Road.

2.2.3 The existing Vulcan Village forms a small triangular settlement and lies between the Representation Site land parcel and the route of Wargrave Road.

2.2.4 To the north of the Representation Site lies further agricultural land and Newton-le-Willows Cemetery. Vulcan Park Way continues across the northern boundary of

the Representation Site at this location, albeit strictly as a public footway/cycleway.

Local Highway Network

- 2.2.5 The Representation Site is located approximately 2km to the south of Newton-le-Willows town centre. Wargrave Road serves as a 30mph local distributor route linking Newton-le-Willows with the route of the A49 Newton Road, circa 3km to the southeast. Locally Wargrave Road provides the main access route into the residential outskirts to the south of Newton-le-Willows town centre, and includes footways to both sides of the carriageway as well as street-lighting.
- 2.2.6 Within Newton-le-Willows, to the north, Wargrave Road forms a 4-arm signalised junction with the A572 Crow Lane, and Water Street. Approximately 600m to the south of the centre of the Representation Site, Wargrave Road becomes Alder Root Lane and passes over Newton Brook with a restricted width one-way shuttle working bridge. Immediately to the southeast Alder Root Lane then passes beneath the WCML over-bridge, again restricted in width such that one-way shuttle working is required. This section of Alder Root Lane, with two neighbouring sections of restricted width carriageway does not have any formal priority control - rather approaching traffic from both directions is required to cede priority to traffic passing through each restriction. It should also be noted that Alder Root Lane to the south of the WCML crossing lies within the neighbouring LHA Warrington Borough Council (WBC).
- 2.2.7 To the south of its WCML crossing, Alder Root Lane is rural in nature, with a carriageway width of c4.8m for the majority of its length, and no centreline markings. The route does not include for footways, nor streetlighting. Alder Root Lane is subject to the National Speed Limit (NSL), between its junction with Alder Lane (c600m to the south of the WCML crossing) and the southern extents of the Vulcan Village.

2.3 Sustainable Transport Connections

Walking and Cycling

- 2.3.1 As already noted, the Representation Site enjoys a good standard of footway connection, by virtue of existing infrastructure both along the immediate sections of Wargrave Road, but also by virtue of the sustainable transport infrastructure that has been/is proposed to be delivered as part of the Newlands Grange development. Development of the Representation Site would present the opportunity to ensure that this existing high standard of sustainable transport infrastructure is maintained through the Site.
- 2.3.2 The Institute of Highways & Transportation (IHT) guidance 'Providing for Journeys on Foot' suggests that a 1.0km walk catchment represents an acceptable walk distance to a place of work for commuting purposes, with a preferred maximum catchment being 2.0km. In addition, the document identifies a preferred maximum walking distance of 1.2km to key local facilities such as schools and shops.
- 2.3.3 **Figure TREPS1** to this report illustrates a maximum 2.0km walking iso-distance catchment measured from the Representation Site and demonstrates that such a walking catchment crucially extends as far as the southern extents of Newton-le-Willows town centre, thereby demonstrating that the Site lies within an acceptable walking commute of the major local employment and retail centre. In addition, **Figure TREPS1** identifies that the Site lies within an acceptable walking distance of other key retail facilities, public transport services, schools and a local community hospital. The Representation Site therefore lies in a highly sustainable location and is well supported by a wide of local services and facilities.
- 2.3.4 In addition to walking opportunities, it is generally accepted that the pedal cycle represents a practical alternative travel option to the private car for journeys of up to 5km (particularly for commuting journeys). **Figure TREPS2** to this report illustrates a 5km cycle iso-distance catchment measured from the Representation Site and demonstrates that such a cycle catchment extends as far as covering the entirety of Newton-le-Willows, as well as the northern outskirts of Warrington, and surrounding outlying settlements.
- 2.3.5 Details of available local cycling routes and connections are illustrated in **Figure TREPS3** to this report, which demonstrates that a small number of traffic free cycle routes are available within a short cycle ride of the site.

Access to Buses

- 2.3.6 **Figure TREPS4** to this report illustrates the location of site relative to local bus and rail infrastructure, whilst **Figure TREPS5** provides an extract from the Merseyrail public transport map, which identifies local bus and rail services. Review of this information identifies that the site is well located to take advantage of existing sustainable public transport connections. In addition to a number of local bus stops in the surrounding area, the site is also located within a 2km walking distance of both Earlestown and Newton-le-Willows rail stations.
- 2.3.7 Currently only the 22 service operates along Wargrave Road past the adjacent Newlands Grange site, with all other local services further to the north, albeit still within a reasonable walking distance of the Site. It should be noted that the Newlands Grange development would, however, provide for the improvement of local bus service provision via its S106 Legal Agreement. Accordingly, the Site's bus service connectivity would be further enhanced.
- 2.3.8 **Table TREPS2.1**, below, provides a summary of the existing services that operate in the immediate area surrounding the Site, demonstrating that the Site is well served with frequent services to a number of local destinations, including local rail stations.

Table TREPS2.1 - Available Local Public Transport Connections

Route Number	Route Description	Day Time Frequency
22	Warrington - Vulcan Village	Hourly
34A	St. Helens - Vulcan Village	3/Hour
141	St. Helens - Newton-le-Willows Rail Station	Hourly
602/603	Newton-le-Willows - Haydock - Ashton-in-Makerfield	Hourly

Access to Rail

- 2.3.9 As already noted, the Representation Site lies within a 2km walk of the existing rail stations of both Earlestown and Newton-le-Willows to the north. Services from these stations provide regular onward connections to key regional employment and leisure destinations such as Manchester, Liverpool, Newcastle, Crewe, Holyhead

and Llandudno. Such onward connectivity further highlights the Site's potential to provide future residents with a wide range of high standard sustainable travel opportunities.

2.4 Local Personal Injury Accident History

2.4.1 A brief review of Personal Injury Accident data (PIA) for the local highway network in the immediate vicinity of the Representation Site has been obtained from Crashmap.co.uk, which provides DfT approved data as recorded by the police. Data has been reviewed for the most recent five-year period of Q1 2014 - Q3 2018 and is illustrated at **Figure TREPS6** to this document. **Figure TREPS6** identifies that the surrounding highway network has a predominantly positive safety record, taking into account the volumes of traffic that are likely to be using it. Incidents along Wargrave Road/Alder Root Lane are, for the most part, slight, and only two incidents have been recorded at the restricted width section of route near the WCML crossing. It is considered that these trends likely reflect both the high-quality nature of Wargrave Road in the immediate locale, as well as the traffic-calming effects of Alder Root Lane's geometry to the south.

2.5 Planning Policy Context

2.5.1 Chapter 9 of the National Planning Policy Framework (Feb 2019), sets out the English Government's objectives and measures in respect of ensuring that the highway network remains resilient to the needs of its users in the face of future increases in population and employment throughout England. In particular NPPF Chapter 9 focusses on the objectives and measures which will further promote the use of sustainable travel - be that through local and regional transport planning policies, local authority development plans, and development management.

2.5.2 St. Helens Borough Council is currently in the process of developing its Local Plan 2020-2035, and a Submission Draft of the Plan was published in January 2019. Review of this document identifies the following key Policy extracts:

Policy LPA02: Spatial Strategy:

"2. New development will be directed to sustainable locations that are appropriate to its scale and nature and that will enable movements

between homes, jobs and key services and facilities to be made by sustainable non-car modes of transport.

9. The provision of a convenient, safe and sustainable transport network, and the delivery of improvements to the network, will be required in line with Policy LPA07.”

Policy LPA03: Development Principles

“2. b) Maintaining, and where possible enhancing, accessibility to a good range of services and facilities;

6. Minimise the need to travel and maximise the use of sustainable transport by:

- a) Guiding development to sustainable and accessible locations or locations that can be made sustainable and accessible;*
- b) Encouraging a shift towards more sustainable modes of transport for people, goods and freight and encouraging the use of lower carbon transport;*
- c) Encouraging safe and sustainable access for all, particularly by promoting the use of public transport, walking and cycling between homes and employment;”*

Policy LPA07: Transport and Travel

“1. The Council’s strategic priorities for the transport network are to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions. To achieve these priorities it will seek to:

b) Ensure that new development is sufficiently accessible by road transport, walking, cycling and public transport;

3. New development will only be permitted if it would:

- a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network;*
- b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services;*
- d) enable good levels of accessibility by walking and cycling between homes, jobs and services;*
- e) provide for safe and convenient pedestrian, cycle and vehicular access and movement to, from and within the development;”*

3.0 DEVELOPMENT POTENTIAL

3.1 Overview

3.1.1 The Representation Site covers an area of approximately 15.56ha, and it is anticipated that the site could deliver a notional capacity of approximately 260 dwellings.

3.2 Highway Access Arrangements

3.2.1 Access to the Representation Site could be taken from a number of locations. The existing Newlands Grange development, which lies to the site's immediate western boundary, could facilitate access to Wargrave Road via its two established junctions. Alternatively, an appropriate standard of vehicular access to the Site could be secured via the Site's direct frontage with Wargrave Road to the immediate south of Vulcan village. Ultimately access to the site could comprise a mix of these opportunities.

3.2.2 Clearly any potential access scheme would be required to be fully investigated in conjunction with SHBC as the Local Highway Authority. It is considered, however, that any combination of the above access opportunities should nevertheless provide an appropriate and safe means of access without giving rise to any material impact on local highway network capacity.

3.3 Opportunities Arising from Representation Site Development

3.3.1 This section outlines the opportunities that the Representation Site could present if brought forward for residential development.

Sustainable Transport

3.3.2 As noted in Section 2 of this document the site is beneficially located to be able to provide a wide range of sustainable travel opportunities for any future residents. These include access to key local facilities and services

via existing local walking and cycling infrastructure, as well as onward bus and rail connections to key regional employment and retail destinations. Indeed, Figures **TREPS1-5** clearly demonstrate the sustainable location of the Representation Site and its ability to accommodate a residential development with extremely positive sustainable transport links.

- 3.3.3 With the above in mind, the locational characteristics of the Representation Site provide opportunities to meet both local and national sustainable planning objectives of promoting opportunities for the use of alternative modes to the private car and managing the overall traffic impact associated with any potential new development.

Planning Policy

- 3.3.4 Taking both national and local planning policy into account, it is considered that the Representation Site presents important opportunities in delivering the housing requirements of SHBC whilst maintaining and promoting the core planning policy objectives of further sustainable travel and reducing the need to travel by private car.

4.0 POTENTIAL EFFECTS OF DEVELOPMENT OF THE REPRESENTATION SITE

4.1 Introduction

4.1.1 As noted in section 2, the Council's Green Belt Review has identified that further work is required with regard to the surrounding highway network before the site's development potential can be confirmed. In full, the Green Belt Review notes the following:

“The highway network in the surrounding locality also has a number of constraints. For example, Alder Root Lane, which links this area of Newton to the Warrington to the south, is a narrow country lane (single track in places) which includes an awkward bridge under the railway. The highway issues in the area are likely to prove difficult to fully address. Therefore further work on the surrounding highway network is likely to be required before the extent of development potential within the parcel can be confirmed.”

“In summary, the parcel is considered to be suitable in part for safeguarding, with the development potential of the area to be safeguarded being subject to the further investigation and resolution of highway issues.”

4.1.2 The highway concerns raised within the Green Belt Review focus specifically on the local highway network to the south of the Site, in particular the route's geometry and sections of restricted one-way shuttle working. The following sections provide a detailed consideration of the operation of this section of highway, in order to demonstrate that the above concerns are both unfounded, and should not represent a barrier to the safeguarding of highway quality prospective development sites within the Newton-le-Willows area.

4.2 Trip Generation

4.2.1 The potential trip generation of any development of the Representation Site has been derived on the basis of the 85thile residential trip rates agreed between SHBC and the developers of the Newlands Grange site in the 2005 Transport Assessment (produced by Halcrow Group) for that scheme. These trip rates are reproduced in **Table TREPS4.1** below:

Table TREPS4.1: Residential Development Trip Rates

Trip Rates (per dwelling)	Arrivals	Departures	Total
AM Peak	0.170	0.630	0.800
PM Peak	0.520	0.230	0.750

4.2.2 Application of these trip rates to a potential maximum development size of 260 dwellings across the Representation Site provides the following estimates of trip demand:

Table TREPS4.2: Predicted Residential Development Trip Demand

Trip Total	Arrivals	Departures	Total
AM Peak	44	164	208
PM Peak	135	60	195

4.2.3 The above analysis demonstrates that a development of up to 260 dwellings could generate in the order of 200 peak hour two-way movements. It should be noted car travel could reasonably be lower than this, however, as the 2005 TA from which the above trip rates are taken did not include for any reduction in trip demand as a consequence of both existing local sustainable travel opportunities and also the implementation of site-wide travel planning measures at the Newlands Grange site. Accordingly, the above estimates of vehicular trip generation are likely to represent an upper estimate.

4.2.4 This level of trip generation is a forecast of all vehicular movements to and from the site during the peak hour periods, and so includes vehicular movements to a wide range of potential destinations. The 2005 Halcrow TA for the Newlands Grange site includes an appraisal of anticipated trip distribution, and forecasts that c70% of development related traffic would travel to and from the south, with the remaining 30% distributed via routes to the north.

4.2.5 Assuming that traffic from the Representation Site distributes on the same basis, the delivery of the Site could be anticipated to give rise to an additional c140 two-way movements on Wargrave Road/Alder Root Lane to the south. This represents approximately 2 additional vehicle movements per minute during peak hour periods.

4.2.6 The 2005 Halcrow TA goes on to consider local highway network junction capacity, at a number of key locations, and for future assessment year conditions which include for local development schemes that were committed at the time, as well as forecast background traffic increases. These capacity assessments determined that the proposed site access junctions would operate with reasonable levels of spare capacity in the future year conditions.

4.2.7 With the above in mind, potential future traffic levels associated with the Representation Site are unlikely to give rise to any notable impact on the demonstrably safe existing operation of the local highway network in this area, nor would such traffic increases be expected to give rise to any local junction capacity concerns.

4.3 Alder Root Lane Highway Geometry

4.3.1 Section 2 of this document outlines the nature of the above restrictions along the route of Alder Root Lane to the south in further detail - these include two neighbouring sections of limited width carriageway which require one-way shuttle working, and which operate without any formal priority control. In addition, Alder Root Lane further to the south is of a limited width of c4.8m, without centreline markings.

4.3.2 The Newlands Grange development proposals for c630 dwellings were granted planning permission following call in by the Secretary of State for Communities and Local Government. The appeal documentation for the development includes the Inspector's findings in respect of a wide range of matters, not least those concerning highways and transportation. Review of this appeal documentation, along with the 2005 planning application documentation, has identified that there were no concerns raised by either St. Helens Borough Council Highways, or the neighbouring Warrington Borough Council Highways, with regard to the section of Wargrave Road/Alder Root Lane between the Vulcan Village and Alder Lane.

- 4.3.3 Furthermore, the 2005 Halcrow TA includes a specific chapter dedicated to the consideration of this section of route, in light of its highway geometry and features. The TA outlines that a site visit was undertaken to better understand the operation of this section of route, and that it was found that the route appears to operate safely and without issue. Indeed, it was noted that the restricted width sections appeared to encourage low approach speeds. In addition, a review of accident history records at that time concluded that there appeared to be no prevailing accident concern.
- 4.3.4 In spite of the above findings, it was proposed within the Halcrow TA that a formalised system of priority be considered with northbound traffic ceding priority to southbound traffic. However, no further details were provided as to how this system may be implemented, given that there is no intervisibility between the northbound approach south of the WCML crossing and the southbound approach north of the Newton Brook crossing. Ultimately, planning permission for the Newlands Grange development proposals did not include for any mitigation scheme for this section of highway.
- 4.3.5 In order to inform this representation document Focus TP staff have undertaken the same site visit exercise. This involved driving the full length of Wargrave Road and Alder Root Lane in this area, as well as specifically observing the operation of the restricted section. Observations were undertaken during the late afternoon/early evening peak period, and it was noted that prevailing traffic levels were reasonably busy.
- 4.3.6 The findings of this site visit appraisal matched those of outlined in the 2005 Halcrow TA. Prevailing traffic speeds appeared to be extremely low at the restricted width one-way working sections, whilst prevailing speeds further south on Alder Root Lane appeared to average c30-35mph. No issues were recorded in terms of traffic passing on the section to the south where the width falls just below 5m. Moreover, the one-way shuttle working section at the WCML and Newton Brook crossings appeared to work together to ensure that no traffic was unduly held up for any notable period of time, nor were there any issues of conflict between opposing traffic streams.

- 4.3.7 An additional appraisal of the most recent 5-year period of local accident trends (see Section 2 of this document and **Figure TREPS6**) concludes that there is no notable prevailing highway safety record. Just 2 incidents are recorded in the immediate vicinity of the WCML and Newton Brook restrictions, with limited numbers of incidents recorded elsewhere on the route.
- 4.3.8 In summary, Focus TP considers that the route of Wargrave Road/Alder Root Lane to the south of Vulcan Village demonstrably operates without any highway safety concerns. There is no prevailing highway safety record, nor do on-site observations suggest that there is any notable highway safety risk arising from the route's restricted sections of geometry. In essence, the restricted geometry along the route appears to ensure that the route is somewhat "self-policing", forcing drivers to travel at lower speeds and with higher levels of awareness.
- 4.3.9 With the above in mind it is considered that any prospective development of land to the east of Newlands Grange, to deliver c260 dwellings, would not give rise to any notable highway safety concerns. Moreover, the previous consideration of the Newlands Grange development to deliver over 600 dwellings did not identify any such concerns from either Local Highway Authority, the Planning Inspectorate, nor the Secretary of State for Communities and Local Government. Accordingly, any such development would be highly unlikely to give rise to a severe highway impact, as referenced in the National Planning Policy Framework 2019 (Para 109).
- 4.3.10 Nevertheless, in the event that either of the Local Highway Authorities still hold any concerns regarding the future delivery of the Representation Site, the planning process would provide the opportunity not only to investigate the above matters in further detail, but also any opportunities to further enhance the positive highway safety record of Alder Root Lane to the south.
- 4.3.11 It is therefore concluded that the highway related concerns identified in SHBC's Green Belt Review are unfounded. Accordingly, it is considered that the Representation Site represents an appropriate location for residential development, which would meet both local and national transport planning

policy objectives. There should therefore be no reason to remove the draft allocation site 4HS from the SHBC Local Plan.

5.0 SUMMARY

5.1 Introduction

5.1.1 The Representation Site is of a size that could accommodate approximately 260 residential dwellings. The majority of the Site is currently safeguarded for residential development within the St. Helens Borough Local Plan 2020-2035 Submission Draft (January 2019). However, in its supporting Green Belt Review SHBC has identified that *“further work on the surrounding highway network is likely to be required before the extent of development potential within the parcel can be confirmed.”*

5.1.2 This report includes a review of existing local highway conditions, an appraisal of the Site’s sustainable transport connections, consideration of any potential for development at the sites, review of a potential site access strategy and an analysis of the potential traffic related effects of any such development on the local highway network. The purpose of this report is to appraise SHBC of the anticipated highway and transport related aspects associated with the potential future delivery of the Representation Site.

5.2 Site Location & Existing Highway Conditions

5.2.1 The Representation Site is considered to be well located to take advantage of an existing high standard of sustainable transport infrastructure, including local walking and cycling routes, as well as accessibility to bus and rail facilities. Moreover, the site is located in an area which is well supported by a wide range of local services and key facilities, such as schools, shops and medical facilities.

5.2.2 Taking into account core national and local transport planning objectives, the Representation Site provides opportunities to meet the sustainable planning objectives of promoting the use of alternative modes of travel to the private car, and managing the overall traffic impact associated with any potential development.

5.2.3 A review of local highway accident trends has identified that the local highway network does not have any prevailing sections with an adverse record. Indeed, the

appraisal concludes that the immediate local highway network has a generally positive record.

5.3 Development Potential

5.3.1 The Representation Site covers a combined total area of approximately 15.56ha. Accounting for typical development densities and any landscape and infrastructure requirements, it is envisaged that c260 residential dwellings could be developed in total.

5.3.2 Access to the site could reasonably be taken directly from a number of locations. An initial appraisal has identified that a safe and appropriate form of access could be accommodated either via the existing Newlands Grange development to the immediate west, and its own connections with Wargrave Road, or via a direct access to Wargrave Road to the south of the Vulcan village.

5.4 Potential Effects Arising from Development of the Representation Site

5.4.1 Traffic levels associated with any potential development of the Representation Site have been derived via reference to agreed residential development trip rates taken from the 2005 Halcrow Transport Assessment that supported the planning application for the Newlands Grange development to the west

5.4.2 The review of trip generation suggests that a development of c2605 dwellings could give rise to approximately 200 additional two-way movements on the local highway network during the peak hour AM and PM periods. Taking into account previously accepted distribution trends identified in the 2005 Halcrow TA, c70% of development traffic could route to and from the south via the route of Alder Root Lane. This would equate to c140 additional two-way movements on the route of Alder Root Lane as a result of any development of the Representation Site. Such traffic levels represent just 2 additional vehicle movements per minute during peak periods, and are considered unlikely to have noticeable effect upon local highway network operation or safety.

5.4.3 An appraisal of the Alder Root Lane route to the south of the site has concluded that highway related concerns identified in SHBC's Green Belt Review are

unfounded. The route demonstrably operates without any highway safety concerns; there is no prevailing highway safety record; nor do on-site observations suggest that there is any notable highway safety risk arising from the route's restricted sections of geometry.

- 5.4.4 Moreover, previous consideration of the Newlands Grange development to deliver over 600 dwellings did not identify any such concerns from either Local Highway Authority, the Planning Inspectorate, nor the Secretary of State for Communities and Local Government. Accordingly, any such development would be highly unlikely to give rise to a severe highway impact, as referenced in the National Planning Policy Framework 2019 (Para 109).

5.5 Conclusions

- 5.5.1 It is concluded that the Representation Site provides an appropriate location for any potential future residential development opportunity. The site is well located to promote sustainable travel, with access to transport services which ensure excellent transport links to key employment destinations within the region. The Site thereby meets the key sustainable travel planning objectives of both local and national planning policy. Moreover, vehicular access to the site could be accommodated safely and appropriately, whilst vehicular trip levels from the site are not expected to be substantive enough to have any noticeable effect on sensitive local highway network links. Finally, the highway related concerns identified in SHBC's Green Belt Review have been concluded to be unfounded, with the local highway network having demonstrably positive safety credentials.



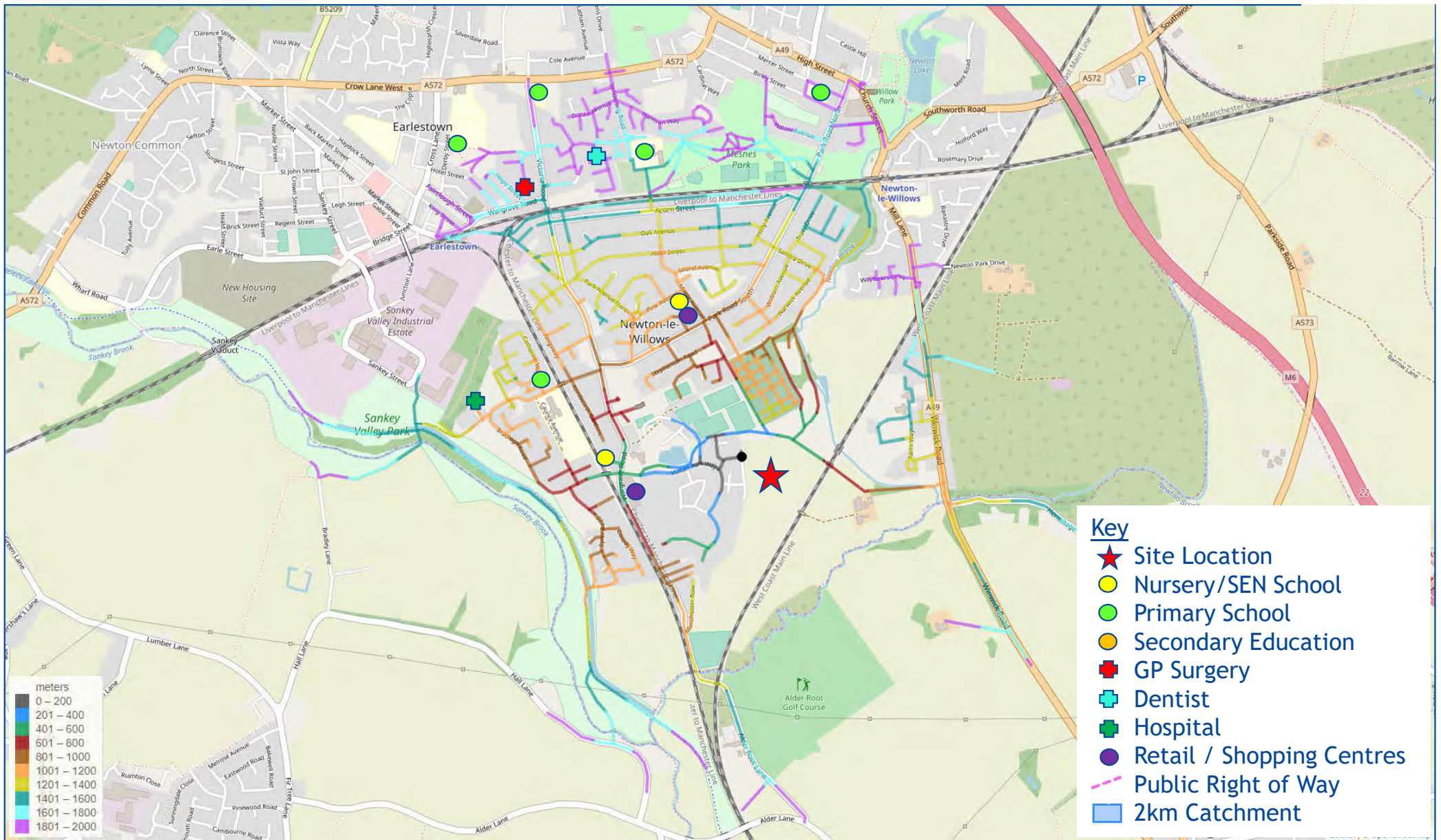
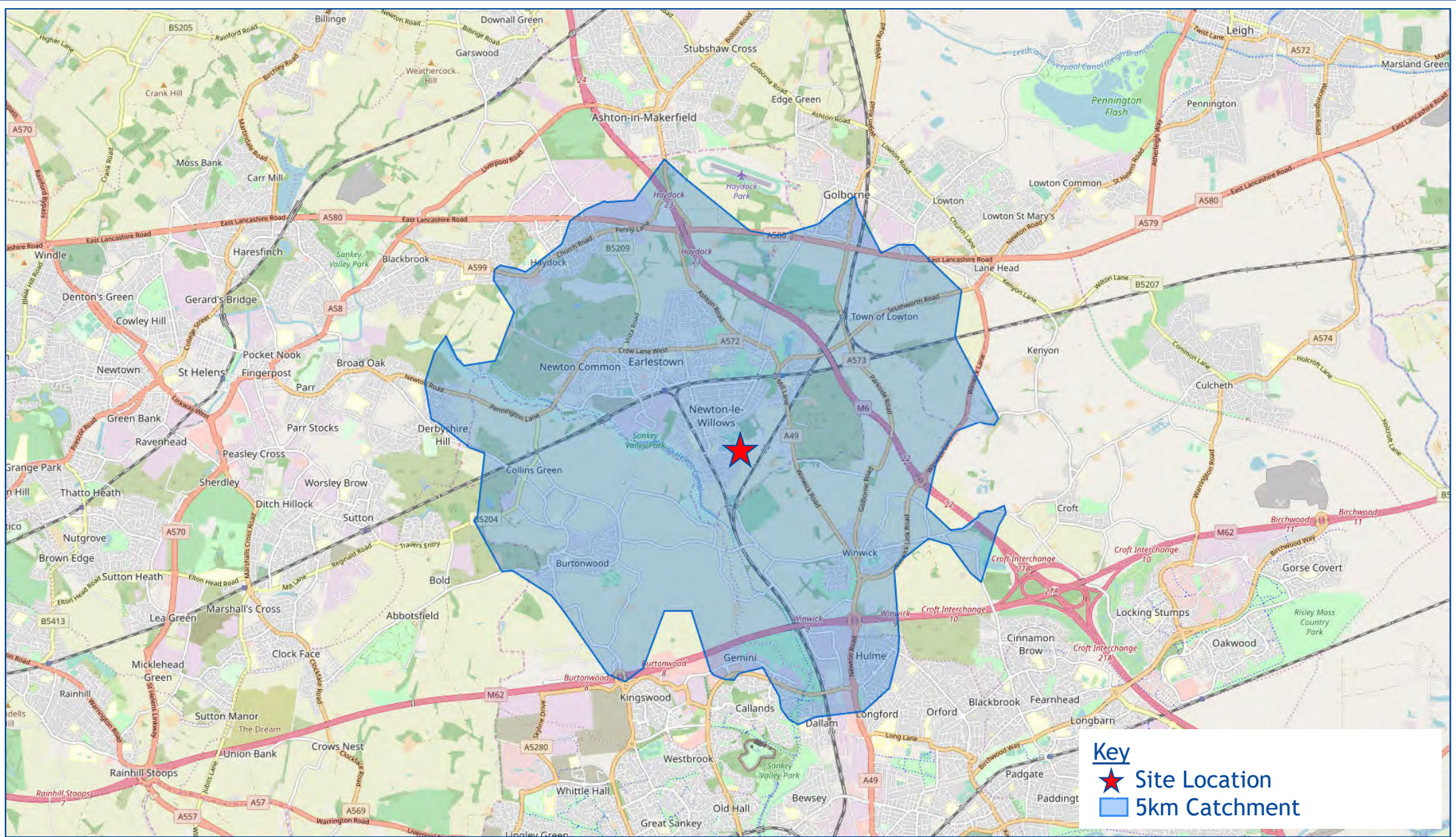


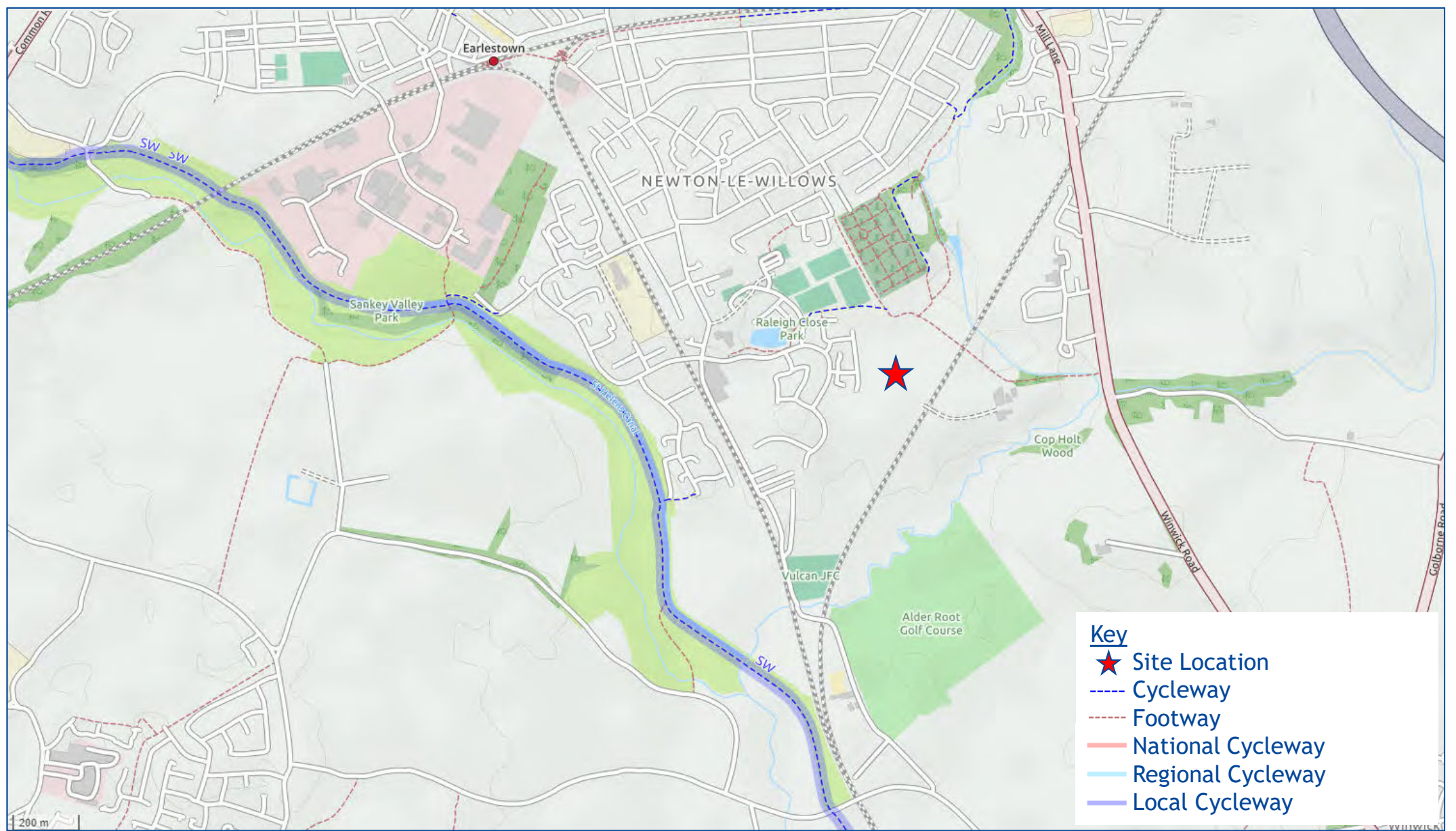
Figure TREPS1 Site Location - 2.0km Walk Catchment

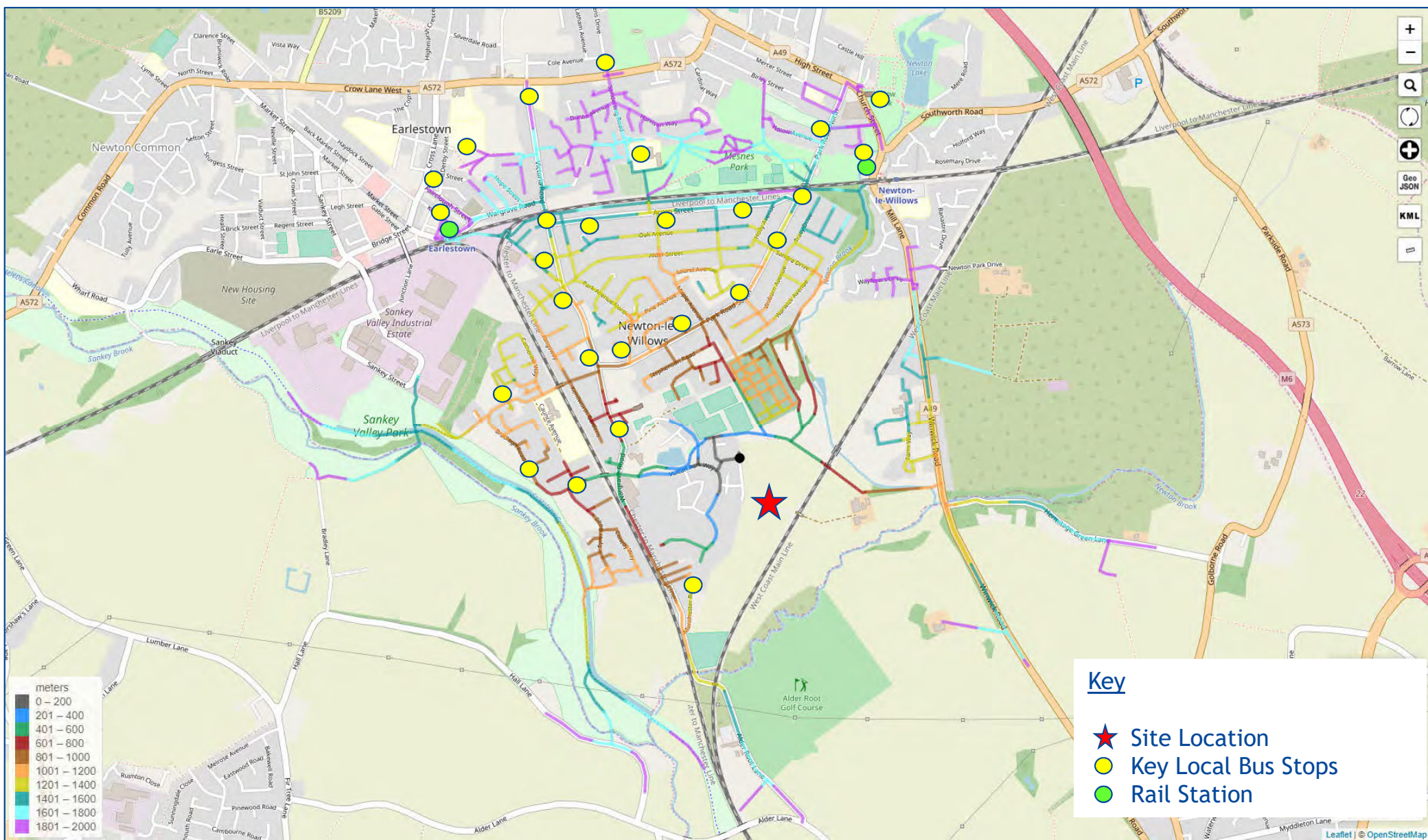
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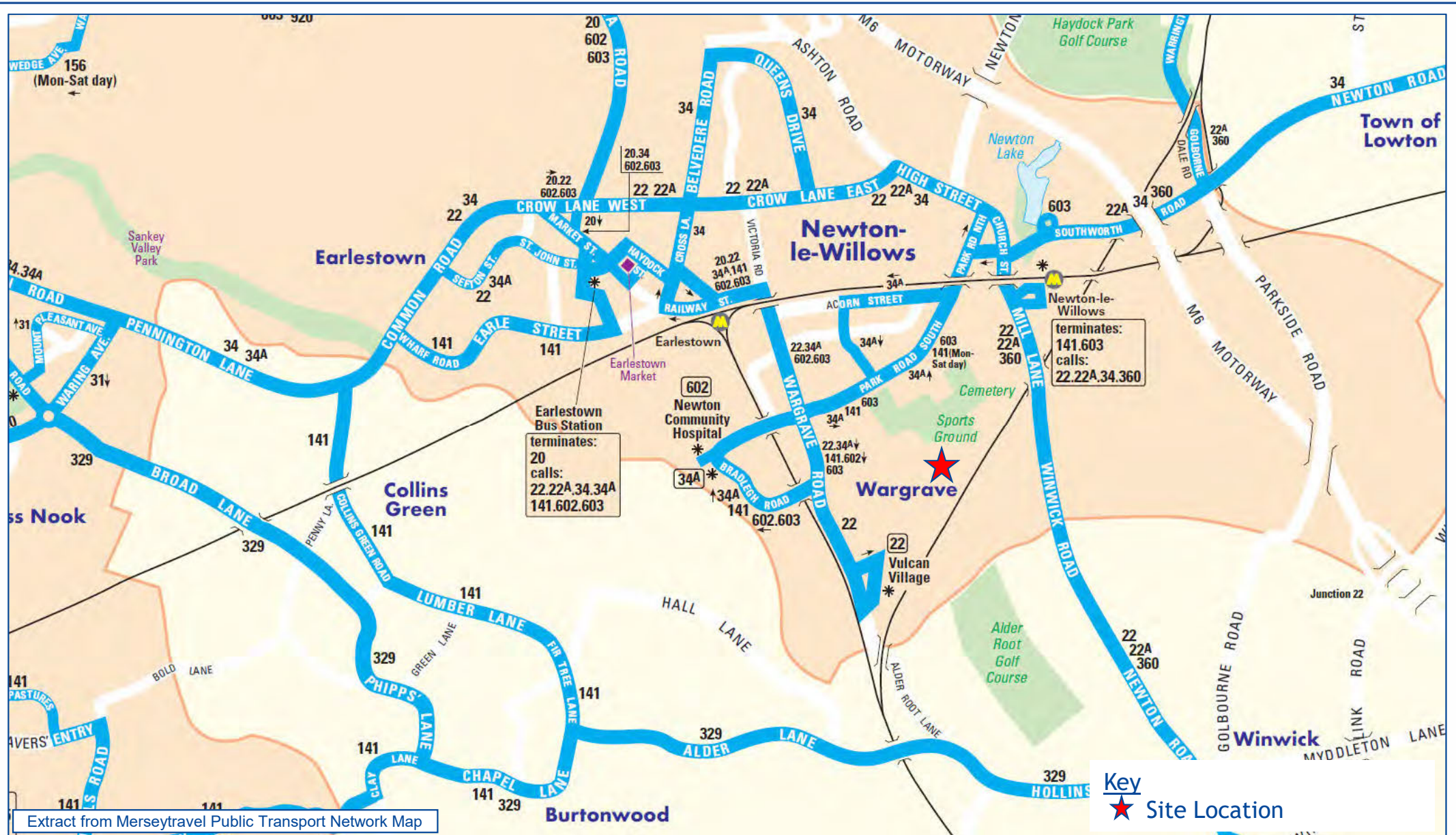
Newlands Grange, Newton-le-Willows

March 2019









Extract from Merseytravel Public Transport Network Map

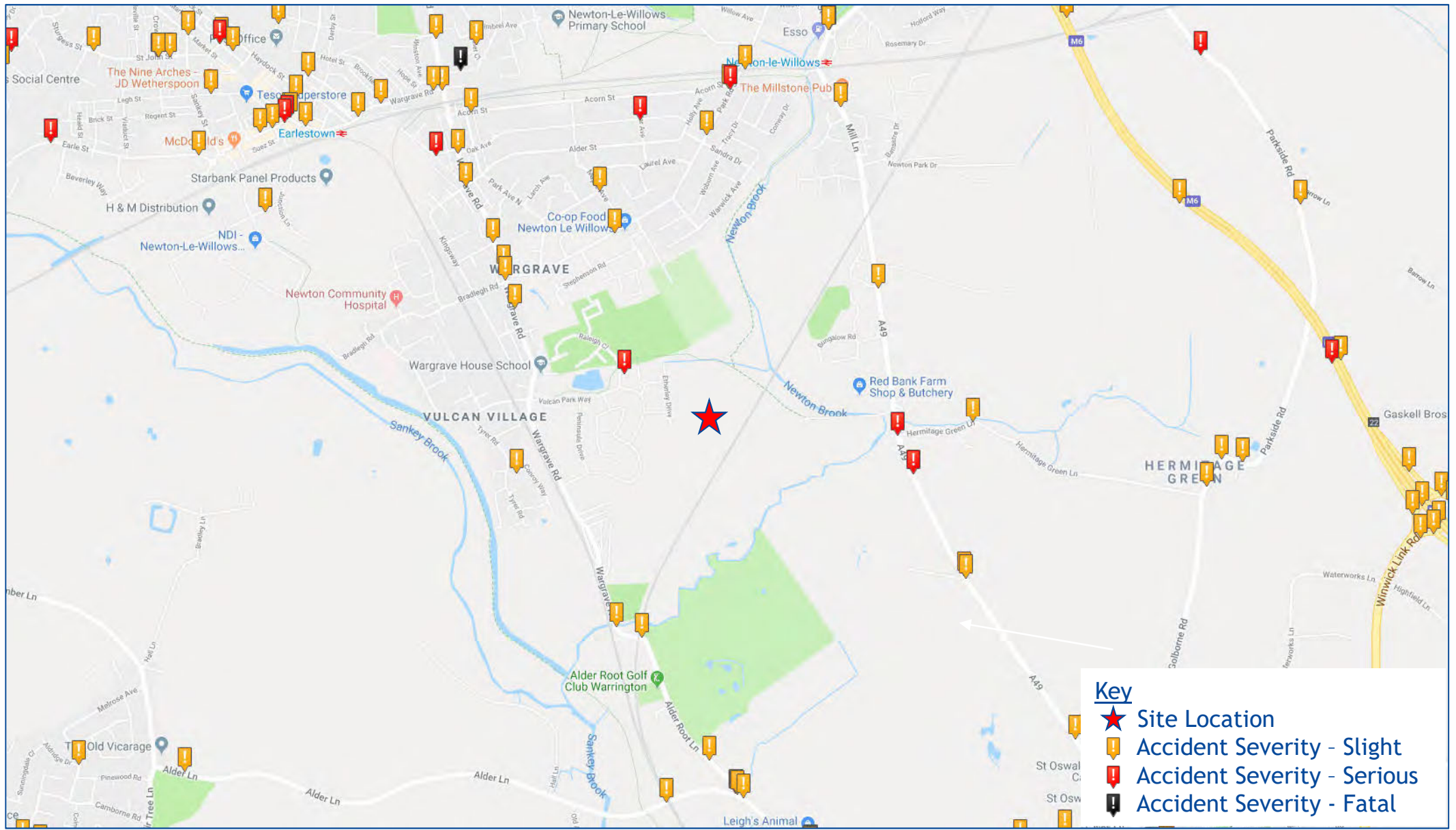


Figure TREPS6 Local Accident History - Q1 2014 - Q3 2018

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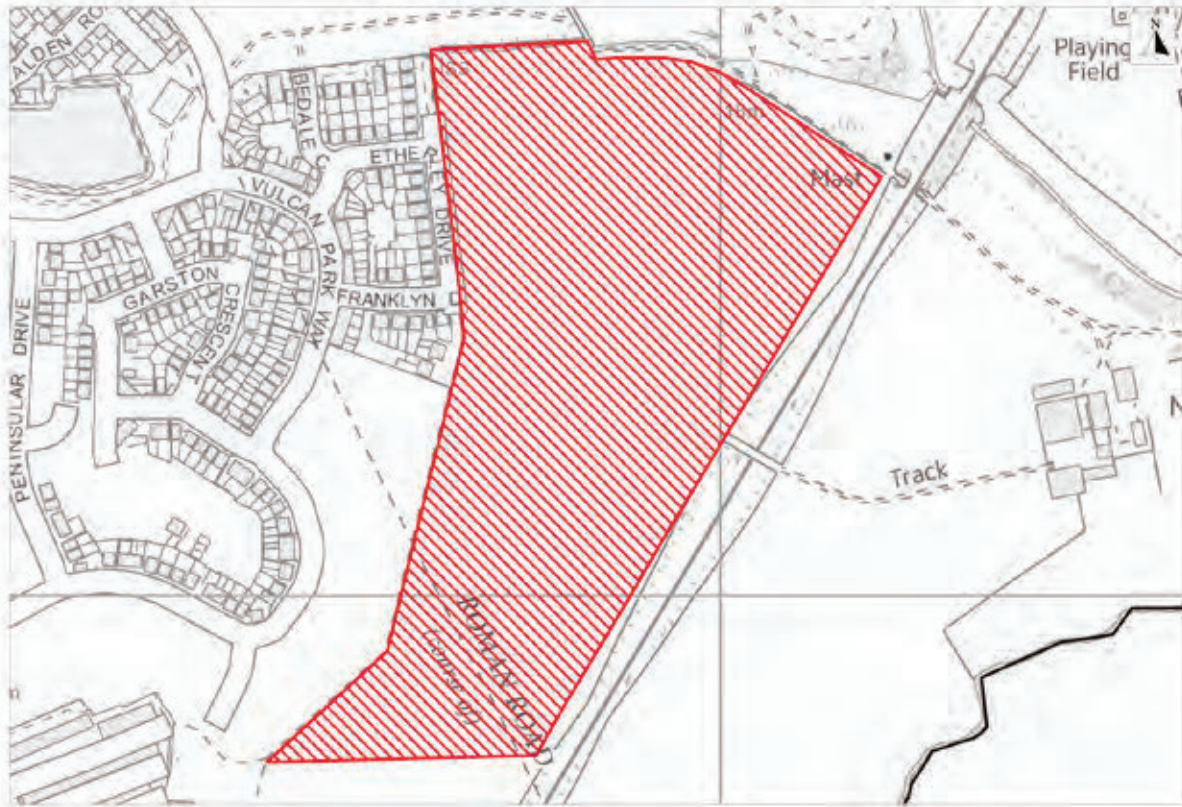
Newlands Grange, Newton-le-Willows

March 2019





LPSD Ref:	4HS - Land East of Newlands Grange (former Vulcan works) and West of West Coast mainline, Newton-le-Willows	Ward:	Newton
Notional Capacity:	256 units	Designation:	Safeguard



Requirements:

- Safe highway access should be provided from the existing development to the west of the site (with any necessary off-site improvements).
- Appropriate noise attenuation measures, including buffers, should be incorporated to protect new residents from unacceptable noise levels from the adjoining.
- Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.
- Significant landscaping will be required to the south of the site to provide an appropriate buffer with the adjacent Vulcan Village Conservation Area.
- The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.



- Site Boundary
- - - Potential Estate Road
- Potential Pedestrian/
Cycle Routes
- ➔ Potential Vehicle Access
- ➔ Potential Secondary
Vehicle Access
- ✱ Potential SuDS
- ✱ Potential Play Area

DEVELOPMENT QUANTUM

Taking into account the location of the Site and the density of existing residential development, an average density of 30 dwellings per net hectare has initially been applied. This provides the potential to deliver in region of 260 dwellings.

The proposed density allows for the creation of a sustainable and balanced residential development, comprising a mix of housing types, sizes and tenures.



- 1 Primary vehicular access to the development is proposed via Wargrave Road.
- 2 Secondary vehicle access points will be provided from surrounding residential streets.
- 3 Development will be set back from the Vulcan Village Conservation Area and the proposed houses will include architectural details and materials that positively respond to this heritage asset.
- 4 Heritage interpretation will be provided on the Site adjacent to the Newton-le-Willows Heritage Trail and Health Walk.
- 5 An estate road extends into the Site from Wargrave Road, beyond which is a hierarchy of secondary streets and tertiary lanes.
- 6 A series of focal point spaces are dispersed within the Illustrative Masterplan. These spaces are designed to be distinctive and legible, assisting navigation from one area of the development to another.
- 7 New pedestrian footpaths are proposed to join with the surrounding residential areas, including an informal footpath and landscaped corridor to the south the Site.
- 8 The layout of new dwellings will be designed to achieve natural surveillance of all new routes and public realm.
- 9 Use of best practice block-structure principles, will provide outward facing housing frontages which securely enclose rear garden spaces and achieve natural surveillance of streets and public green space.
- 10 The Illustrative Masterplan makes provision for children's play.
- 11 Landscape themes will define character areas and routes within the development including street trees, grassed verges and hedgerows.
- 12 Provision of a no-development easement and landscape buffer adjacent to the railway line, reflective of previous Jones Homes developments located adjacent to the West Coast Mainline where proposed landscape buffers are reflective of noise and vibration assessments undertaken at these locations.

Project
 Land East of Newlands Grange
 Newton-le-Willows
 Drawing Title
 Concept Masterplan

Date	Scale	Drawn by	Check by
12.03.19	1:2000@A2	SW	VR
Project No	Drawing No	Revision	
27131	BW01	V3	

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Historic England representations to the Preferred Options Local Plan



Historic England

Our ref: PL00014549

PL00052323

[REDACTED]
Development Plans Section
Chief Executive's Department
Town Hall Annexe
Victoria Square
St. Helens
Merseyside
WA10 1HP

20th January 2017

Dear [REDACTED]

- 1. St. Helens Local Plan 2018-2033 – Preferred Options: December 2016**
- 2. Sustainability Appraisal – Interim SA Report: December 2016**
- 3. Draft Green Belt Review 2016**

St. Helens Metropolitan Borough Council

Thank you for inviting Historic England to comment on the above suite of planning documents currently being consulted upon by St Helens Council. We are pleased to do so. We are also grateful for confirmation from your [REDACTED] that we may make representations by letter. Our response should be read in conjunction with our letter of 1 March 2016 in which we provided generic advice on the Scoping Document preceding the Preferred Options Local Plan.

Overview

Following the publication of the National Planning Policy Framework (NPPF) in March 2012, the government's position on Local Plan-making and the historic environment is made clear. The NPPF requires Local Plans to enable the delivery of sustainable development, one of the core dimensions of which is the protection and enhancement of the historic environment (paragraph 7).

In order to satisfy the NPPF, development plans are required, in summary, to –

1. identify the historic environment as a strategic priority (paragraph 156),



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2. contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment (paragraph 126),

3. contain a policy or policies for the conservation, enhancement and enjoyment of the historic environment that is/are clearly identified as strategic (paragraph 156)

4. demonstrate that they have been informed by a proper assessment of the significance of the heritage assets in the area, including their settings, and of the potential for finding new sites of archaeological or historic interest (paragraph 163), and there has been a proper assessment to identify land where development would be inappropriate because of its historic significance (paragraphs 129 and 157).

Where a Plan fails to address these matters it may be considered unsound. Historic England is of the opinion that in a number of fundamental respects the current draft Local Plan fails to satisfy these NPPF policies, is unsustainable, and therefore unsound.

1. The historic environment as a strategic priority

Paragraph 156 of the NPPF requires local authorities to set out in the Local Plan their strategic priorities for the area. There is an expectation that included within them should be the conservation and enhancement of the historic environment, including landscape.

In Chapter 2: *St. Helens Borough Profile* we are informed that the Borough's history is 'inextricably linked with the industrial revolution, coal mining and a world famous glass industry'. Rather than propose that this historic legacy be celebrated and acknowledged as a force for constructive conservation, however, we are told disappointingly that the decline of these industries has only led to those issues and problems thought to lie at the heart of the challenges currently facing the Borough.

The profile of the Borough in this section of the Local Plan inadequately describes the current state of the environment and remains completely silent with regard to the extent or condition of the historic environment of the area.

Chapter 3: *St. Helens in 2033*, paragraph 3.2 – the Vision for the Borough seeks an 'accessible built and natural environment' and a place where 'historic assets are recognised, well used and valued'. Whilst such intentions are welcomed, the Strategic Aims and Objectives which flow from that Vision make reference only to protecting and enhancing 'local character and distinctiveness', with no clear or specific commitment to conserving the historic environment and its heritage assets. The Strategic Aims and Objectives could be improved upon by incorporating the wording of Sustainability Appraisal (SA) Objective 8 '*To protect, enhance and make accessible for enjoyment the cultural heritage and historic environment*'.

Although Chapter 7: Environment and Resources contains a specific policy on the historic environment, and whilst there is occasional reference to heritage conservation elsewhere in the document, the Local Plan conveys no real sense that it is regarded by the Council as a strategic priority for the purposes of satisfying Paragraph 156 of the NPPF. In this respect the Local Plan is unsound.

2. Strategic policies for the conservation of the historic environment



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Local Plans should include strategic policies to conserve and enhance the historic environment of the area (NPPF paragraph 156) and to guide how the presumption in favour of sustainable development should be applied locally (NPPF paragraph 15). Such policies need to be clearly identified as strategic otherwise they will risk being overridden by Neighbourhood Plan policies which are only required to be in general conformity with the strategic policies of the Local Plan (NPPF paragraphs 12 and 185). If the policies delivering heritage conservation may be overridden then the Plan cannot be confidently predicted to deliver development needs sustainably throughout the Plan period.

As set out, the Local Plan's strategic policies are contained within Chapter 4: *Strategic Policies*. Policy LP11: *Historic Environment* is not one of them.

The Local Plan does not include a policy for the conservation, enhancement and enjoyment of the historic environment which is clearly identified as 'strategic' for the purposes of NPPF paragraph 156. In this respect the Local Plan is unsound.

3. A positive strategy for conservation of the Historic Environment

In order to be compliant with the NPPF, the Local Plan should include a clear and positive strategy for the conservation and enjoyment of the historic environment in the area, including heritage assets most at risk through neglect, decay or other threats (NPPF paragraph 126). It may be derived from an understanding of the issues set out in the evidence base and response to those matters. The strategy should also seek positive improvements in the quality of the historic environment in the pursuit of sustainable development (NPPF paragraph 9).

Policy LPC11: *Historic Environment* contains a number of welcome commitments which can reasonably be regarded as positive in their intent. Preparing conservation area plans, preparing a list of locally important heritage assets, seeking enhanced access, education and interpretation, and tackling heritage at risk with landowners and Historic England are identified as such.

Apart from reference to a community project at Stanley Bank, however, there is nothing in the Local Plan as regards heritage conservation which is specific to the area; nothing that can clearly be seen to be derived from any evidence of the extent or state of the Borough's historic environment. Furthermore, the Local Plan remains silent with regard to how the historic environment can assist in the delivery of the Vision and other policy objectives seeking to secure the economic and social wellbeing of the community, despite numerous opportunities in it for such cross-cutting actions, some of which are identified in the Sustainability Appraisal: Interim Report at paragraph 7.10.23.

Historic England is not satisfied that, taking the Draft Local Plan as a whole, it can be regarded as amounting to a positive strategy for the conservation, enhancement and enjoyment of the historic environment consistent with the NPPF (paragraph 126).

Where opportunities exist for the historic environment to positively assist with the delivery of other Local Plan policies (thereby helping to further develop the positive strategy for it required of the NPPF) we have identified them under 'Additional comments and observations on the Local Plan' below.

4. Gathering evidence



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To be found sound the Local Plan should be based on adequate up-to-date evidence about the historic environment, used to assess the significance of heritage assets (both designated and non-designated) and the contribution they make to the local area (NPPF Paragraphs 158 and 169). It should also entail where appropriate an assessment of historic landscape character.

This requirement is especially relevant as regards areas of significant planning intervention and site allocations where it is important to inform decision-making by undertaking:

- (i) an assessment of the significance of those heritage assets on, or in the vicinity of, the sites concerned
- (ii) an assessment of the extent to which the significance of any assets might be harmed or lost as a consequence of development (or better revealed)
- (iii) an assessment of the extent to which any public benefits might, or might not, outweigh that harm or loss.

Local planning authorities are required by NPPF paragraph 129 to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including any significance derived from its setting). This involves more than identifying known heritage assets on, or within, a given distance of the site in question, but rather a more holistic process which seeks to understand their significance and value to the community. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk while, conversely, an allocation some distance from a heritage asset may cause harm to its significance, thereby reducing its suitability in sustainable development terms.

Furthermore, there needs to be an assessment of the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future (NPPF paragraph 169), and it is also necessary for the authority to identify any heritage assets outside of their administrative area where setting impacts may be caused by potential development proposals.

Historic England's approach to dealing with this requirement of the NPPF is set out in our Advice Note No.3: *Site Allocations* (HEAN3) and is available on our website. It contains a step by step guide to site selection in order to safeguard and enhance the historic environment.

In our response of 1 March 2016 we drew attention to the need for the Council, before proposing key interventions and/or site allocations, to undertake some evaluation of the impact which development might have upon any elements (including their setting) that contribute to the significance of those heritage assets thought to be affected. However, from an examination of the document library supporting the Local Plan it is not evident that the Council has followed the process, outlined in HEAN3, of establishing wherein lies the significance of the heritage assets identified as being within scope, understanding what contribution the site makes, if any, to the significance of those assets, what impact the proposals might have on that significance, and what actions might be needed to avoid/mitigate harm to, or better reveal, those assets.



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Without demonstrating that this process has been followed, and without this understanding of the historic environment of the area and an assessment of the extent to which the significance or value of its heritage assets may be harmed or lost (or improved) by the plan's proposals, the local authority cannot demonstrate that the objectively assessed development needs of the area will be met in accordance with the presumption in favour of sustainable development (NPPF paragraph 14). There would consequently remain a danger that the local distinctiveness and character of the area may be lost.

On the basis of the evidence supporting the Local Plan, Historic England concludes that assessments of the impacts of its site allocations upon the area's heritage assets lack the logic and consistency necessary to demonstrate that they would be sustainable and therefore NPPF-compliant.

Besides a failure to comply with NPPF policy and follow Historic England guidance, the site assessments focus unduly on a proximity principle (Sustainability Appraisal: Interim Report: Appendix II: *The Site Appraisal Framework* – SA Objective 8 refers). Topic Paper 8 of the same report unhelpfully conflates consideration of the built and natural environments, thereby giving rise in a number of cases to positive effects in respect of the natural environment 'neutralising' negative effects on the built (historic) environment. Indeed, Chapter 07 of the Sustainability Appraisal: *Appraisal of the Draft Plan*, dealing with the various policy areas in the Local Plan, makes no reference whatsoever in many instances to the historic environment under the heading of the 'built and natural environment' yet concludes that effects on it would be 'negligible'.

The Technical Appraisal containing Site Assessments identifies numerous sites on which, or near to which, there exists heritage assets. The findings, however, are confusing, and in some cases inaccurate. For example:

GBS_006 – listed buildings lie close to the site. Effects are considered likely, but we are given no information as to wherein lies the significance of those assets, how that significance might be harmed or enhanced by development of the site, or what mitigation if any might be necessary, nor is there any summary findings outlining why any harm would be outweighed by public benefits which cannot be met in any other way.

GBS_023, GBS_112, GBS_145, GBS_058/059, GBS_089, – as above.

GBS_028 and GBS_028.1 – both sites contain listed buildings, and 'effects' are considered likely but could, it is argued, be mitigated. Given the proposed use to which these sites could be put it is perhaps possible that demolition would be required, but nowhere in the assessment is this taken into account or articulated.

GBS_033 – this site adjoins a conservation area and is close to a Scheduled Ancient Monument. Effects are thought to be potentially negative. GBS_034 lies even closer to the monument and contains part of the same conservation area, yet here effects are not thought to be significant. The logic of this assessment is not explained in terms recognisable in respect of the approach advocated by government in the NPPF and Historic England as set out in HEAN3.



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GBS_071 – because the Scheduled Ancient Monument lies more than 50m from the site effects are thought unlikely. There is no assessment of the extent if any to which this monument relies upon the housing site for its significance and no explanation as to why the distance of 50m is relevant to that significance.

GBS_069, GBS_077, GBS_080 and GBS_129 – these sites lie close to conservation areas. Their physical distance to them is considered relevant, which it is to a degree, but the assessments fail to articulate the extent to which these conservation areas rely if at all upon the proposed site allocations for their significance, or how it might be impacted upon.

GBS_136/160 – listed buildings lie close to this site allocation. Their setting is thought likely to be affected, thereby giving rise to negative effects. These effects are not explained in accord with the advice in HEAN3.

GBS_164 – this site contains a listed building. Again, these effects are not explained in accord with the advice in HEAN3.

GBS_104 – a listed building is described as being 183m from the site allocation. Its setting is thought vulnerable to harm, but there is no explanation of the nature of this harm, nor is there any summary findings outlining why any harm would be outweighed by public benefits.

Historic England is not yet satisfied, and the Council has not yet demonstrated, that it has identified and assessed the particular significance of any heritage assets that may be affected by its proposed site allocations and key areas of intervention in accordance with the requirements of paragraphs 158 and 169 of the NPPF and our Advice Note No.3: Site Allocations (HEAN3).

Sustainability Appraisal

As is the case with many sustainability appraisals and site assessment methodologies, design or archaeological investigation at a later date is often cited as the means by which any (often unspecified) harm might be mitigated, or else impacts are adjudged to be unknown or unquantifiable at this stage of the plan and left unassessed, notwithstanding that the proper conservation of that archaeology might prohibit any development or impact upon its attractiveness to developers. This sustainability appraisal is no different.

Although a number of sites examined in the appraisal process are not now to be taken forward, it is nevertheless worth commenting on the approach taken in respect of them. Throughout the appraisal heritage assets are identified as being affected by a number of proposed site allocations, yet we are advised that no mitigation is required or else that effects on setting are ‘unlikely’.

In respect of numerous sites (some of which are identified above) we are advised that unspecified mitigation is required to avoid harm to the historic environment. In respect of each no Heritage Impact Assessment appears to have been carried out, and the Sustainability Appraisal omits to articulate wherein lies the significance of the heritage assets identified, what contribution the site makes to the significance of those assets, or what impact the proposals might have on that significance, and consequently what



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actions might be needed to avoid harm to or better reveal those assets. As a result the Sustainability Appraisal cannot say whether or not those site allocations are sustainable and compliant with NPPF paragraph 14.

Mitigation, including archaeological evaluation, is often thought of as something to be dealt with at a later stage through, for example, Environmental Impact Assessments associated with planning applications. Mitigation, however, may not always be appropriate or desirable. There may be cases where the principle of development brings with it such harm to, or loss of, the significance of heritage assets that it cannot be mitigated, in which case it should be refused unless development is necessary in order to achieve overriding public benefits. We all acknowledge the value of developer certainty. It would serve no benefit, for example, for a site to be allocated only for archaeology of national significance to subsequently preclude or severely hamper implementation.

If the Sustainability Appraisal is unable to identify what is significant about a heritage asset (and what contribution its setting makes to that significance) it cannot properly assess the extent to which that significance might be harmed or lost as a consequence of a site being allocated for development. The appraisal would therefore fail in its ability to assess whether the development would satisfy SA Objective 8 '*To protect, enhance and make accessible for enjoyment the cultural heritage and historic environment*'. If it cannot do this, and uncertainty in this regard remains, the Council would be unable to demonstrate that such harm or loss of heritage significance is necessary to achieve wider public benefits that cannot be met in any other way. This will cast doubts on the site allocation being justified, deliverable and, ultimately, sustainable.

Draft Green Belt Review 2016

The Green Belt Review concludes that Green Belt purpose No.4: *To preserve the setting and special character of historic towns* can be disapplied, on the grounds that the Borough has no nationally recognised historic towns or villages (paragraphs 3.12 and 3.13). The Review recognises, however, that some areas have historic links and qualities (such as listed buildings) and we are advised that these assets will be recorded as part of the assessment of constraints but undertaken separately.

Historic England concurs with the Council's screening assessment, although for the sake of completeness, however, the Council should assess whether or not the Borough's Green Belt performs this function in respect of any historic towns or villages lying in adjoining local authority areas. However, even where it is ultimately considered appropriate/acceptable to remove a parcel of land from the Green Belt the local authority would continue to have a duty to safeguard the historic environment and its heritage assets (formally designated or otherwise) in line with government policy and sectoral advice. This requirement will be of considerable importance in relation to the need to properly assess the potential for development sites to cause harm to or benefit the historic environment across the Borough as a whole.

Additional comments and observations on the Local Plan

Policy LPA01 – Section 3(l) of this policy is not NPPF-compliant as regards heritage protection. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990



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confers a general duty in respect of listed buildings. Paragraph (1) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have *special regard* to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Paragraph (2) states that a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings.

In consequence even development causing harm to a designated historic asset which is judged to be ‘less than substantial’ must still be outweighed by public benefits or run the risk of not being sustainable and therefore contrary to NPPF policy.

Policy LPA02 – Historic England would urge the Council to have regard to viability issues and appropriate thresholds for developer contributions when considering schemes which include for the constructive use of heritage assets. We are anxious to ensure that the historic environment of St. Helens is appropriately safeguarded through the Local Plan, as well as through investment decisions contained within, and encouraged by, the Infrastructure Delivery Plan intended to assist its success, and facilitated in turn by any Section 106 Agreement or Community Infrastructure Levy (CIL) receipts.

Public realm is now generally taken to be the publicly accessible parts of the environment, be it ‘physically and/or visually’. In consequence a great many heritage assets ‘accessible’ to the public could legitimately be regarded as part of the public realm and therefore be the recipient of or focus for special attention in the form of investment through or relief from charging. The range of heritage assets to be found in the public realm includes, for example, art galleries, railway stations, schools, hospitals, churches, canal structures etc.

In going forward, the Council has the opportunity to take a number of pro-active steps to assist the wider protection of the historic environment and avoid unintended harm to it.

These steps might include –

1. acknowledging and identifying a broad range of infrastructure types of a historic nature that could benefit from appropriate investment
2. positively encouraging development to sites and areas where heritage is known to be ‘at risk’
3. asserting in any charging schedule that relief may be provided for developments that involve (wholly or in part) the conservation of heritage assets where viability might be threatened by having to meet the full amount of the levy (in much the same way as providing relief to ensure viability in respect of previously developed land)
4. asserting in any charging schedule that relief may be provided where, in order to meet the levy, an increased quantum of development is required to maintain



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viability which in itself could threaten to harm the significance of historic assets on or otherwise affected by the development of the site.

Historic England believes that in addressing more directly the conservation of the historic environment in this way the Council can do much to add to the appearance, quality and reputation of the Local Plan area with the objective of attracting new residents, employees and visitors through a properly safeguarded and appropriately enhanced historic environment.

Through such an addition to the policy there exists an opportunity to positively assist with safeguarding the historic environment, thereby helping to further develop the positive strategy for it required of the NPPF.

This policy and supporting paragraph 4.4 promotes the protection and enhancement of the natural environment, but remains silent with regard to the historic environment. Paragraph 7 of the NPPF accords the natural and historic environment equal weight and consideration in the planning process. In this respect the policy is not NPPF-compliant.

Policy LPA03(6) – making best use of existing built (historic) fabric is an important means by which waste reduction and lower energy consumption can be achieved. Building repair, adaptation and reuse can reduce the amount of material to be taken to landfill and reduce the energy costs associated with the manufacture of new building materials and their transportation to site.

Policy LPA04(5) – suggests in its wording a welcome focus on the reuse of existing older or vacant buildings, which appears to contrast with paragraph 4.81 which appears to focus on demolition and rebuild.

Policy LPA04(7) narrowly regards historic and cultural assets as only being of value to the tourism industry or in respect of rural enterprise, whereas it is generally acknowledged to be of considerable value to a much broader range of economic sectors.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPA04.1(EA9) – policy and associated commentary in respect of Parkside West makes no reference to the fact that this site (and Parkside East) both contain and lie in close proximity to designated heritage assets, namely a Scheduled Ancient Monument and various grade II listed buildings – this despite the identification of them in the Sustainability Appraisal and its conclusion that effects upon the historic environment are likely. The NPPF makes clear that substantial harm to, or loss of, a Scheduled Ancient Monument should be ‘wholly exceptional’ and such harm or loss to grade II listed buildings should be ‘exceptional’. Whilst the Council might be able to demonstrate that the public benefits of developing the site are sufficient to outweigh any harm to the historic environment, it is still necessary for the harm to be justified in relation to NPPF policy and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.



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Policy LPA05 – it should be acknowledged that some older (terraced) housing in the Borough could be adjudged to be of historic value, and as a consequence there would be a need to safeguard any significance it possesses and to weigh the public benefits of any proposed interventions against any loss of significance.

An opportunity exists for this policy to positively assist with safeguarding the historic environment, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPA05.1 – not only is it necessary for these strategic sites to comply with heritage policy, it is necessary for their inclusion in the Local Plan to demonstrate that where there would be adverse effects upon the historic environment their development is necessary to achieve public benefits which cannot be met in any other way. A failure to do so would render those sites unsustainable as far as NPPF policy is concerned. Site HA8: *Land at Eccleston Park Golf Club* and accompanying commentary, for example, makes no reference to the nearby listed building despite the fact that the Sustainability Appraisal recommends screening in mitigation.

Policy LPA08 – see comments above in respect of developer contributions.

Policy LPA09 – it should be acknowledged that some green infrastructure is of heritage value in its own right. Conservation areas and historic parks & gardens are such examples, along with cemeteries, canals etc. Their conservation should be an integral part of enhancing the green infrastructure of the Borough.

An opportunity exists for this policy to positively assist with safeguarding the historic environment, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPA10 – see comments in respect of Policy LPA04.1.

Policy LPB02 – Historic England welcomes the intention to produce an Area Action Plan or Town Centre Masterplan to, amongst other things, maintain and enhance the town's built heritage.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPC03 – whilst Historic England is satisfied that the sites currently identified for Gypsies, Travellers and Travelling Showpeople would not impact materially upon any heritage assets, the policy should contain a criterion safeguarding the historic environment from unjustified harm in order to guide any future sites which may come forward during the plan period.

Policy LPC05 – this policy should recognise that many forms of open space are possessed of historic interest. Cemeteries, and parks and gardens, for example, may be registered as



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Historic Parks & Gardens; some might contain listed buildings; some might be important to conservation areas and the setting of other heritage assets.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF. The policy could give additional definition and protection to historic and archaeological resources and assets in the same way that Policy LPC07 seeks to do.

Policy LPC07 – see above.

Policy LPC09 – the commentary accompanying this policy makes welcome reference to the European Landscape *Convention*, but in doing so fails to recognise that its definition of landscape protection is to ‘conserve and maintain the significance or characteristic features of a landscape, justified by its heritage value derived from its natural configuration and/or from human activity’. Additionally, St. Helens is covered by the Merseyside Historic Landscape Characterisation project but neither the policy nor its accompanying text make any reference to it.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPC10 – this policy and associated commentary fail to recognise that many trees and areas of woodland are of heritage conservation value in their own right. Some may be crucial to the character and appearance of conservation areas and other heritage assets such as Historic Parks & Gardens; some may benefit the setting of listed buildings; some may lie along historic rights of way.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPC11 – point (2) should seek to ‘safeguard’ the significance and distinct quality of the built and historic environment.

Point (3) proposals should be refused where they would result in unjustified harm to the significance of heritage assets, that is, where public benefits which cannot be met in any other way are insufficient to outweigh the harm.

Point (4) should seek the preparation and updating of Conservation Area Character Appraisals *and* Management Plans.

Point (7) is equally applicable to proposed site allocations in the Local Plan.

Point (9) – the NPPF makes clear that even ‘less than substantial’ harm to either designated or non-designated heritage assets will be unsustainable if it is not outweighed by public benefits. This clause is not NPPF-compliant and therefore unsound.



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Historic England welcomes the intention to work with landowners etc to tackle heritage at risk. The identification of grade II listed buildings at risk would be of considerable assistance in this regard and would constitute a further strand to a positive strategy for the historic environment.

Policy LPC12 – new development in inappropriate places may alter the hydrology of other areas, thereby potentially giving rise to concomitant threats to buried archaeology.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPC13 – the NPPF makes clear that even ‘less than substantial’ harm to either designated or non-designated heritage assets will be unsustainable if it is not outweighed by public benefits. Clause (1)(c) is not NPPF-compliant and therefore unsound.

Clause (5) should reference the Merseyside Historic Landscape Characterisation project.

Policies LPD01 and LPD02 – whilst these policies require development to be ‘sympathetic’ to surrounding land uses and ‘respectful’ of existing buildings, they convey no clear requirement for development to be respectful of the status and significance of heritage assets and the context in which they are found. Nor do these policies require development to actively consider how it will enhance or better reveal their significance (NPPF policy 137).

Policies LPD04 and LPD05 – see above.

Policy LPD07 – the use of the word ‘normally’ is unnecessary. It provides no additional control over such development, nor does it clarify the circumstances in which the policy will be overridden.

Criterion (iv) - see above. In order to be NPPF-compliant, apparatus is required to avoid harm to the significance of any and all heritage assets (not just conservation areas and the setting of listed buildings) unless public benefits outweigh that harm.

Policy LPD11 – the historic environment has the potential to improve the health and wellbeing of the residents of St. Helens. Conservation of its cherished heritage assets can be a focus for community cohesion and action: historic parks and gardens, and even cemeteries, for example, can provide spiritual uplift in the form of both physical activity and quiet contemplation.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.

We trust these representations and comments are of assistance to you. Should you wish to discuss any of the matters raised I or one of my colleagues will be happy to.



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

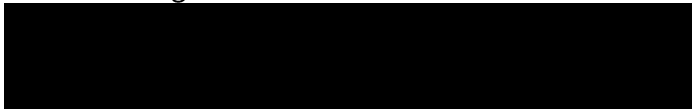
Correspondence or information which you send us may therefore become publicly available.




Yours sincerely,



Karl Creaser
Historic Places Team Principal
Historic England



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW

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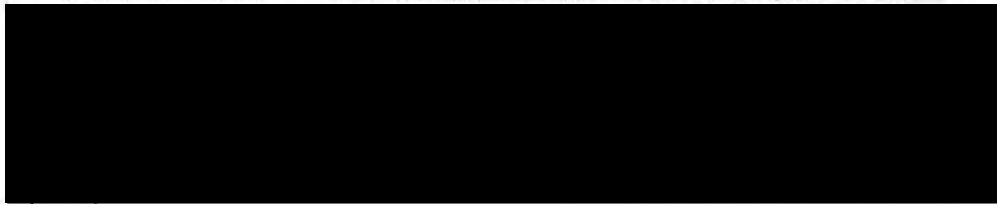
St Helens Local plan - Pre-Submission Draft - Response by Revelan

John Pearce

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:53



- ① - LPA02
- ② - LPA04
- ③ - SPATIAL VISION
- ④ - LPA05
- ⑤ - LPA03
- ⑥ - STRATEGIC AIM + OBJECTIVE

10 Attachments



Ltr to St. Helen's Council JP 13.03.19.pdf Site Location Plan.pdf



lpsd-representation-form Strategic Aims and Objectives.pdf lpsd-representation-form Policy LPA03.pdf



lpsd-representation-form Proposals Map .pdf lpsd-representation-form Policy LPA04.pdf



lpsd-representation-form Spatial Vision.pdf lpsd-representation-form Omission Site.pdf



lpsd-representation-form Policy LPA02.pdf Proposals Map Extract Newton-le-Willows.pdf

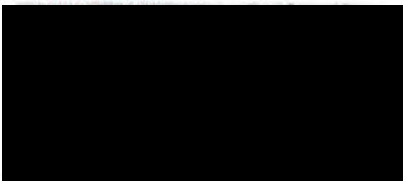
Dear Sir or Madam

Please find attached a response to the Local Plan – Pre-submission Draft Submitted on behalf of Revelan.

Kind regards

John Pearce BSc (Hons) MTPL MRTPI

Senior Planner



harris lamb
PROPERTY CONSULTANCY



Harris Lamb Ltd | 75-76 Francis Road | Birmingham | B16 8SP



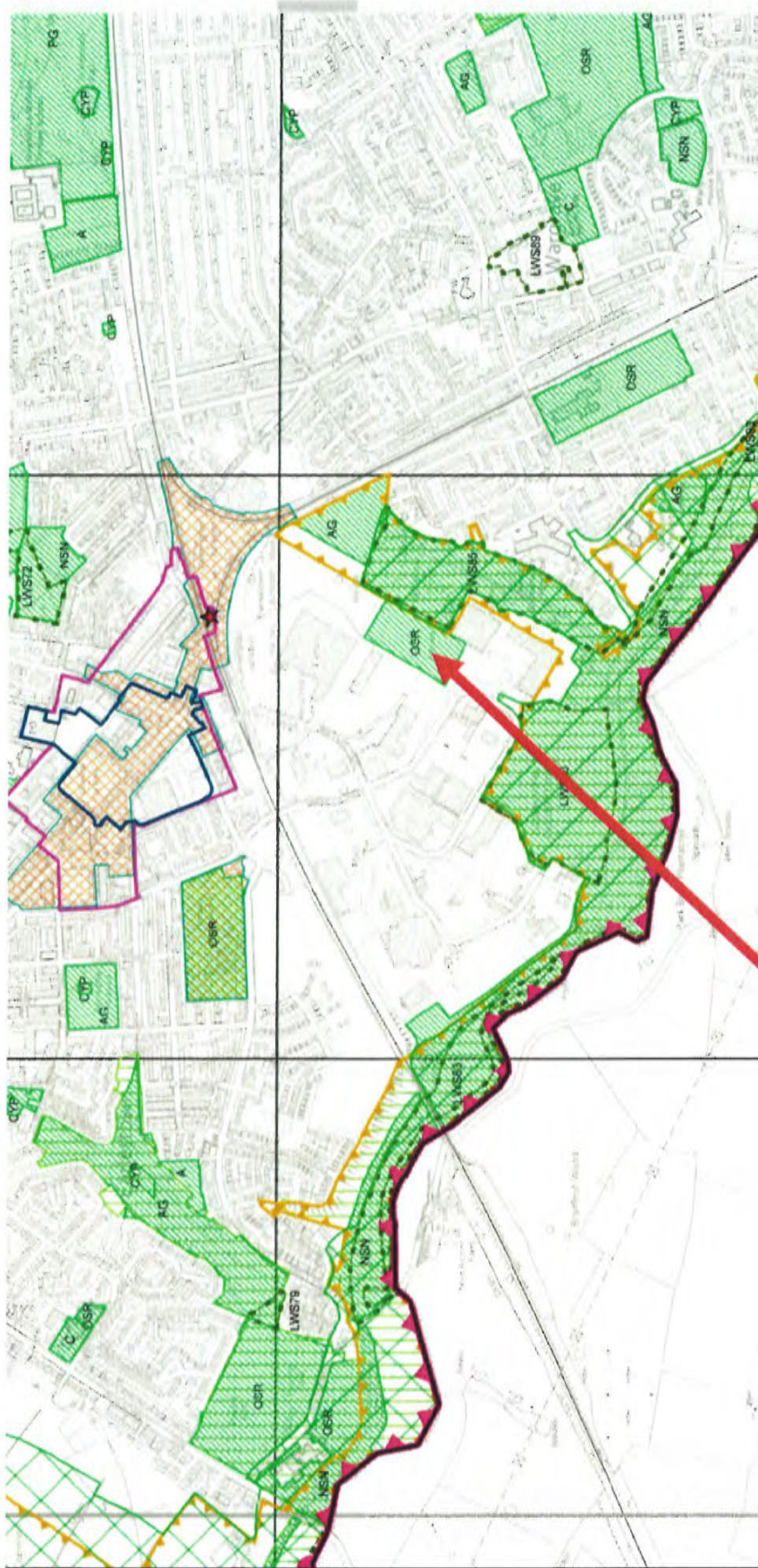
harris lamb
PROPERTY CONSULTANCY

CLEAR THINKING
COMMERCIAL PROPERTY ADVICE

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OUTDOOR
SPORTS + RECREATION
FACILITIES



Land at Junction Lane, Newton-le-Willows



St. Helens
Council

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Postcode:	Postcode: B16 8SP
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

Signature: [REDACTED] **Date:** 13th March 2019

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA02	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/> ✓	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/> ✓	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/> ✓	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see attached.

Please continue on a separate sheet if necessary

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<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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Council

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Legally Compliant?	Yes <input type="checkbox"/> <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/> <input checked="" type="checkbox"/>	No <input type="checkbox"/>

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We would welcome the opportunity to explore and present the merits of the site in detail and would benefit from an open discussion on this.

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Postcode:	Postcode: B16 8SP
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No:
Email:	Email: [REDACTED]

Signature: [REDACTED] Date: 13th March 2019

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Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: John
Last Name:	Last Name: Pearce
Organisation/company: Revelan Developments Ltd.	Organisation/company: Harris Lamb Planning Consultancy
Address: c/o Agent	Address: Grosvenor House 75 – 76 Francis Road Edgbaston Birmingham
Postcode:	Postcode: B16 8SP
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No:
Email:	Email: [REDACTED]

Signature: [REDACTED]	Date: 13 th March 2019
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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FURTHER INFORMATION

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NEXT STEPS

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map	Junction Lane – OSR designation	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/> ✓	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/> ✓	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> ✓
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see attached.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The need or not to retain the designation is nuanced and would benefit from discussion in public.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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St. Helens
Council

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Other documents (please name document and relevant part/section)										

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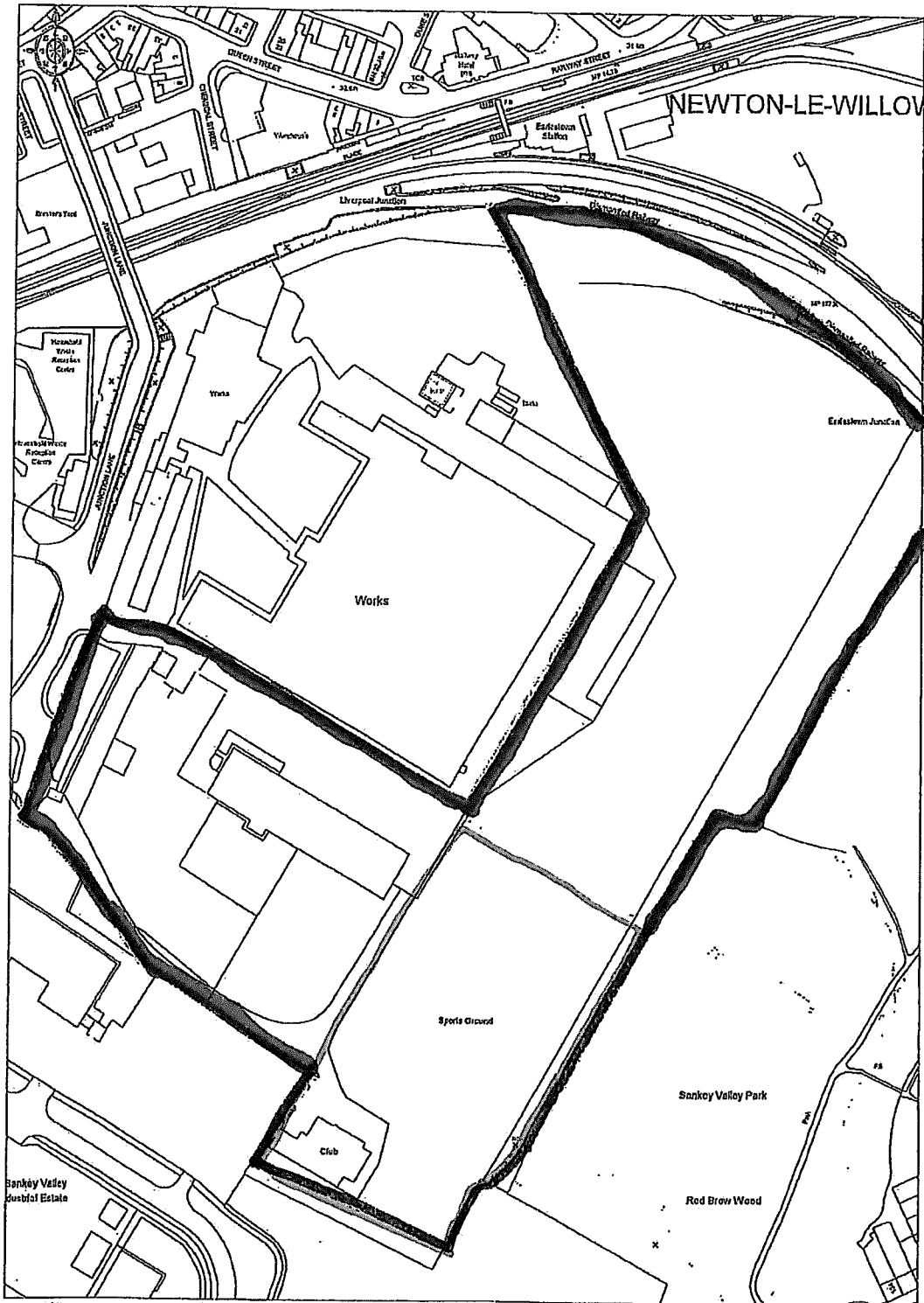
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Junction Lane, Newton Le Willows.WA12 8DL



Ordnance Survey

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Our Ref: P1635/JP
Date: 13th March 2019

Grosvenor House
75-76 Francis Road
Edgbaston
Birmingham B16 8SP

[REDACTED]
Head of Local Plans
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP

BY EMAIL ONLY
planningpolicy@sthelens.gov.uk

Dear [REDACTED]

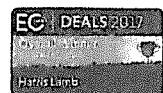
**St Helens Pre-Submission Draft Local Plan
Response by Revelan Developments Ltd.**

We are instructed by Revelan Developments Ltd. to submit representations to the St Helens Pre-Submission Draft Local Plan. Revelan have let and sold a number of industrial premises on the Sankey Valley Industrial Estate, Newton-le-Willows. These units have been successfully let and the location has proved very attractive to occupiers, which affords convenient access to the strategic motorway network and major conurbations of Liverpool and Manchester. The area has proved very attractive to potential occupiers and a number of enquiries have been received by Revelan's agent from a wide variety of B Class users looking to locate in the Borough.

The representations submitted below relate principally to an area of unused land within Revelan's ownership at Junction Lane, Newton-le-Willows. Please see site location attached. The area of land is currently identified as open space in the Pre-Submission Draft Local Plan, although it has not performed this function for more than 10 years and is not publicly accessible. Revelan have never been approached by another other user seeking to purchase the site for sports or recreation use. Revelan are, therefore, seeking the removal of the open space designation and for the site to be allocated for employment use instead. Our detailed comments are set out below.

Spatial Vision

We support the vision of creating a range of high quality employment development within the Borough, which makes use of the excellent transport links that benefit the Borough. Similarly, we agree that established employment areas will continue to provide affordable accommodation for a wide range of employers, thereby helping to facilitate local employment and job growth, whilst attracting inward investment.



Strategic Aims and Objectives

✓ In light of the Council's vision, we specifically support the strategic aims and objectives that relate to ensuring a strong and sustainable economy.

Policy LPA02: Spatial Strategy

✓ We support the Council's spatial strategy of directing sustainable regeneration and growth of St Helens to the main settlements, which includes Newton-le-Willows. Similarly, we support the intention to retain existing employment areas where they are suitable and viable to maintain a diverse portfolio of accessible employment opportunities across the Borough. The Sankey Valley Industrial Estate is one such employment area that successfully attracts a range of both local and national occupiers. In light of the success of the estate to attract occupiers, we consider it wholly appropriate to direct further development to it, particularly where there is market demand for new accommodation in this location. This aspect of the spatial strategy will assist with delivering economic growth objectives and job creation in the Borough.

✓ The spatial strategy also seeks to take steps to maintain and enhance the Borough's network of ecological, open space and recreation sites in accordance with Policy LPA09. Whilst we do not object to this in principle, we return to this point below in the context of Revelan's land at Junction Lane, Newton-le-Willows.

✓ The policy is, therefore, considered sound as it positively prepared and consistent with national policy.

Policy LPA03: Development Principles

✓ We generally support the development principles set out in the Policy, specifically, those that relate to improving the economic well-being of the Borough. The objective of creating and retaining a range of employment and training opportunities that are readily accessible by non-car modes is seen as particularly important and, therefore, supported.

The policy is, therefore, considered sound as it positively prepared and consistent with national policy.

Policy LPA04: A Strong and Sustainable Economy

✓ We support the Council's aim to deliver a minimum of 215.4 hectares of land for development over the Plan Period. We have no specific comments on any of the sites that are identified as draft allocations for employment development. Whilst the policy focuses on the protection and retention of sites in employment use, it could usefully include a reference to supporting new employment development on sites that are not currently, or have previously been, used for employment purposes, which subject to adherence with other policies of the Plan, will contribute to the pool of employment land and premises in the Borough.

✓ As drafted, the policy is not positively prepared. To make the policy sound, we suggest that a further criteria is added, that states that new employment development will be supported on sites that are not currently employment sites, where the proposal would not conflict with other policies of the Plan.

Proposals Map

As stated in the introduction, Revelan's principal objection to the Plan is the open space and recreation designation that covers land in their ownership at Junction Lane, Newton-le-Willows. The attached extract from the Proposals Map identifies the area of land that is subject to the designation, and which we wish to see deleted.

The site is classed by the Council as being an open space and outdoor sport or recreation facility under Policy LPC05. The policy states proposals that would result in the loss of the open space will only be permitted in certain circumstances, and which reflect the tests set out at paragraph 97 of the Framework. Whilst no specific development proposal is in front of the Council at present, similar tests would need to be considered when determining whether the designation should remain for the site as part of the preparation of the Local Plan.

In light of the above, we have sought to clarify with the local planning authority what the site is and, therefore, what type of open space category it falls within. The Council indicated that it fell within the Outdoor Sports and recreation Facilities category, which includes playing fields, golf course, bowling greens, tennis courts and sailing spaces. Notwithstanding that the site has been unused for any form of recreation or formal sports use in over 10 years, it was previously used in as a private sports club, for use by employees of the former occupier that was linked to a previous business located adjacent to the site.

In light of the previous use of the site, we have reviewed the Council's evidence base including the Playing Pitch Strategy Assessment Report (February 2016). The assessment considered the provision of existing sports pitches and facilities in the Borough. In relation to playing pitches, the Assessment confirms at Table 2.10 that there are the equivalent of 29.75 match equivalent sessions of actual spare capacity on existing pitches in Borough. Furthermore, Table 2.13 confirms that there is spare capacity to accommodate adult teams both now and in the future across all analysis areas. The Assessment also confirms that future developments at Ruskin Drive Sports Ground and Garswood Recreation Field would create additional capacity for a further match session on adult pitches and a further three youth 9v9 pitches respectively.

In relation to cricket pitches, the assessment confirms that there is sufficient capacity to accommodate overplay, unmet and future demand at the required peak times, however, there is no spare capacity for rugby union whilst Council plans for the development of Ruskin Drive Sports Ground to include an artificial grass pitch will assist in meeting additional training requirements for both rugby union and rugby league requirements. St Helens is currently adequately provided for with artificial pitches for hockey use.

The Council's evidence indicates that the existing provision of pitches for football, rugby union, rugby league, cricket and hockey is meeting current demand and that there is some spare capacity to accommodate additional use. The Council's proposal for further development at Ruskin Drive Sports Ground and new development at Garswood Recreation Field will also add additional capacity to meet emerging demands. The Assessment of playing pitches indicates that there are no overriding capacity issues with the current level of provision. There is also the potential for the proposed strategic housing allocations to deliver new pitches and facilities, where these are of a sufficient scale to warrant their provision.

In light of the position set out above, there is no overriding reason to retain the site as an area of open space or recreation. The site owner has no intention to use the site as open space, nor is it publicly accessible. Due to the length of time since it was last used, it has become overgrown

To: St Helens Council

Date: 13th March 2019

and fallen into disrepair. Accordingly, we seek the deletion of the open space designation covering the site on the Proposals Map.

The evidence is such that designating the site for open space and recreation use is not justified as there is no compelling need for the site to be retained for such a use. Furthermore, Revelan's view is that the site would be better put to use for an alternative use, principally employment. ✓

Omission Site

In seeking the removal of the open space designation for the site, Revelan also propose that the site should be identified as being suitable for employment development, principally, but not exclusively, within the B Use Classes. Chapter 6 of the Framework sets out the Government's policies for building a strong and competitive economy. Paragraph 80 states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The omission site is currently being marketed and has attracted considerable interest from potential occupiers who are looking for new premises and who operate within the storage and distribution sectors. As evidenced by the Council's proposal to remove land from the Green Belt and to allocate this and/or safeguard land for future development, there is clearly a need for additional employment to come forward to meet the Borough's needs. ✓

The site is located adjacent to a well-established industrial estate, that has good access and road and rail links. Additional employment development on the site would relate well to existing development and would have limited impact, if any, on the residential amenity of existing residents located to the south east.


Development of the site would, therefore, make a positive contribution to the supply of employment land and premises in the Borough, whilst making use of an underused area of land in a sustainable location. If the Council continue to pursue the emerging designation, the site will continue to remain unused and vacant and will serve no open space or recreational function, thereby benefiting no one.

As such, the Plan is unsound as it is not positively prepared. In order to make the Plan sound, we suggest that the land at Junction Lane, Newton-le-Willows is identified as being suitable for employment development.

We trust you take our comments into consideration. We would also like to attend the Examination in due course in order to present our case for the reuse and allocation of the site. ✓

In the interim, if you have any questions or require any explanation of the above please do not hesitate to contact me.

Yours sincerely


John Pearce BSc (Hons) MTPL MRTPI
Senior Planner


cc D Fairman – Revelan

RO1957

ELO221



Local Plan Representations on behalf of Consortium - Story Homes, Wainhomes and Eccleston Homes
Helen Hartley
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:56

① - LPA05
② - LPA05 Table 4.6



3 Attachments



Nexus Planning Representation on behalf of Consortium.pdf



Representations Form - Consortium Representations to Policy LPA05.pdf



Representations Form Consortium Representations to Policy LPA05 - Table 4.6.pdf

Dear Sir/Madam

Thank you for the opportunity to comment on the Submission Local Plan.

I am pleased to attach representations on behalf of a Consortium of housebuilders. The Consortium comprises Story Homes, Wainhomes and Eccleston Homes.

I hereby attach a representations statement, and completed representations form.

I would be extremely grateful if you could confirm receipt.

Kind regards
Helen

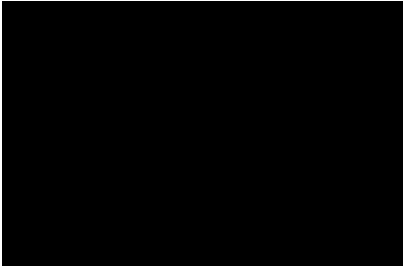
Helen Hartley
Principal Planner



Nexus Planning is pleased to have been shortlisted by the RTPI as a finalist for Planning Consultancy of the Year 2019



Nexus Planning - Manchester
Eastgate, 2 Castle Street
Castlefield
Manchester M3 4LZ





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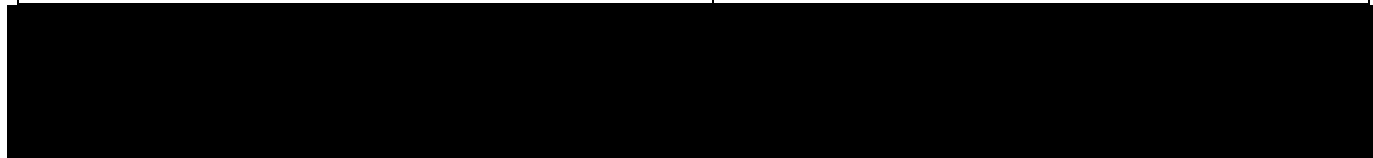
Part A – Personal Details

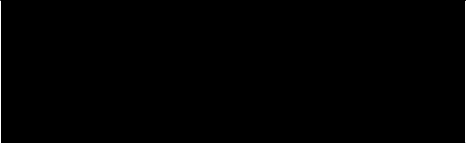
Part B – Your Representation(s).

PART A – YOUR DETAILS

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Ms
First Name:	First name: Helen
Last Name:	Last Name: Hartley
Organisation/company: Consortium comprising Story Homes, Wainhomes and Eccleston Homes	Organisation/company: Nexus Planning
Address: c/o Agent	Address: Eastgate, Castle Street, Manchester,
Postcode:	Postcode: M4 3LZ



Signature: 	Date: <input type="text" value="13.03.2019"/>
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Yes (Via Email)

No

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or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see Statement prepared by Nexus Planning on behalf of the Consortium. In particular Section 2 setting out reasons we consider Policy LPA05 to be unsound as regards the housing requirement figure.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see section 2 of Statement prepared by Nexus Planning on behalf of the Consortium.

For the reasons set out in the Statement, we consider Policy LPA05 should establish a housing requirement over the plan period of 604 dwellings per annum.

A LP Policy LPA05 housing figure of 604 dpa would:

- (i) Continue to stabilise and increase the boroughs population (a LP key issue, part of the overarching LP spatial vision and LP Key Strategic Aim 1);
- (ii) Allow for more housing choice and competition;
- (iii) Support planned economic growth; and
- (iv) Reflect the higher levels of housebuilding achieved in years before and after the 2008-2009 recession.

This proposed amendment would ensure this element of Policy LPA05 is justified by the evidence, is effective in meeting housing needs and facilitating growth in the Borough and is consistent with national policy which requires Local Plans to meet local housing needs informed by evidence on scale and mix. In this way, the proposed modification will help ensure a sound plan.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No , I do not wish to participate at the oral examination	X	Yes , I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Consortium is comprised of several housebuilders with key land interests in the Borough. The concerns expressed go to the heart of the soundness of the Local Plan. They are important and complex issues which need to be discussed through the Examination in Hearings process.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

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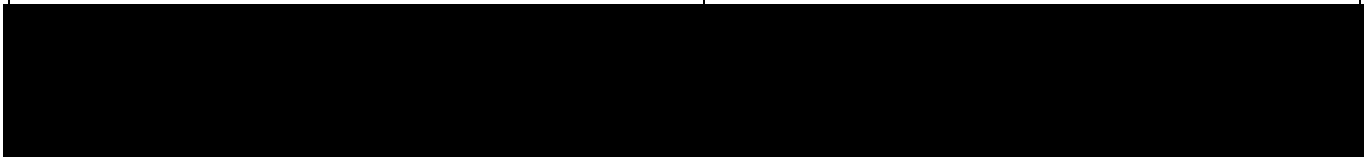
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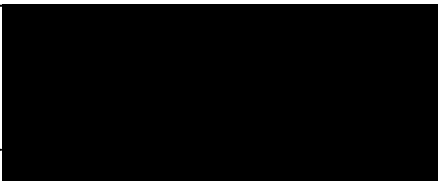
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Other documents (please name document and relevant part/section)									

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Please tick as appropriate

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Effective?	X
Consistent with National Policy?	X

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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments
Please see Statement prepared by Nexus Planning on behalf of the Consortium. In particular Section 3 setting out reasons we consider Policy LPA05 to be unsound as regards the proposed housing land supply.

Please continue on a separate sheet if necessary

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Please see section 3 of Statement prepared by Nexus Planning on behalf of the Consortium.

For the reasons set out in detail in our Statement, we submit that the Local Plan should significantly reduce the level of housing supply anticipated to be delivered through sites identified in the existing urban area. With regard to the detailed site analysis work undertaken, it is recommended that the Submission LP should be seeking to identify Green Belt land for an additional 3,560 dwellings over the Plan Period.

This would result in a strategy for meeting the identified housing needs that is more positively prepared to secure the future growth aspirations of St Helens, is justified in robust evidence about the deliverability of sites within the urban area, and achieves a more effective and deliverable strategy. In this way, the proposed modification will help ensure a sound plan.

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St Helens Borough Local Plan 2020-2035

Representations to the Submission Draft January 2019

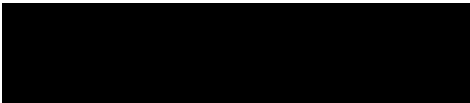
**on behalf of Consortium comprising of Story Homes, Wainhomes
and Eccleston Homes**

March 2019



Contact

Eastgate
2 Castle Street
Castlefield
Manchester
M3 4LZ



Job reference no: 33977

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Executive Summary

This representation is prepared by Nexus Planning on behalf of a Consortium comprising of Story Homes, Wainhomes and Eccleston Homes (hereafter referred to as “the Consortium”). The parties have different land interests across the Borough of St. Helens. Each party has also made separate representations in relation to these specific land interests, which should be read in conjunction with this submission.

This representation has been prepared jointly on behalf of the parties to raise shared fundamental concerns in relation to the St. Helens Submission Local Plan (hereafter referred to as the “Submission LP”).

These concerns primarily relate to **Policy LPA05: Meeting St. Helens Borough’s Housing Needs**.

Housing Needs

Policy LPA05 states that in the period from 1 April 2016 to 31 March 2035 a minimum of 9,234 net additional dwellings should be provided in the Borough of St. Helens, at an average of at least 486 dwellings per annum (dpa).

The Consortium consider that this figure does not represent the most appropriate housing figure to ensure the sustainable growth of the Borough.

In accordance with the requirements of the NPPF (2019) (namely paragraph 11 and 60) and the Planning Practice Guidance (PPG), the LP should contain as a minimum a housing requirement that delivers the standard methodology housing figure for St Helens.

However, the PPG is clear that:

“The standard methodology minimum figure does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”

In proposing a housing requirement of 486 dpa, the Submission LP only proposes a very marginal uplift against the 482 dpa standard methodology figure to support economic growth. In light of the aspirations within the 2016 Preferred Options Draft LP to maximise the economic potential of St. Helens, such a marginal uplift points to a fundamental lack of ambition to deliver real change and enable the sustainable growth of the Borough.

In light of this, the Consortium have real concerns over the soundness of the approach taken to determine the Policy LPA05 housing figure. These concerns principally focus on:

- (a) Achieving sustainable and balanced population growth (a LP key issue, part of the overarching LP spatial vision and LP Key Strategic Aim 1);
- (b) The Policy LPA05 housing figure is significantly lower than previous levels of planned and delivered housing; and
- (c) The level of housing required to support planned economic growth.

With reference to the scenarios assessed within the Strategic Housing Market Assessment (SHMA) Update (2019), **it is submitted that the most appropriate housing requirement for St Helens over the period covered by the LP is 604 dpa.** A LP Policy LPA05 housing figure of 604 dpa (equating to 11,476 dwellings between 2018 – 2035) would:

- Continue to stabilise and increase the boroughs population (a LP key issue, part of the overarching LP spatial vision and LP Key Strategic Aim 1);
- Allow for more housing choice and competition;
- Support planned economic growth; and
- Reflect the higher levels of housebuilding achieved in years before and after the 2008-2009 recession.

Housing Land Supply

As well as the above comments about the identified housing requirement figure, the Consortium also share serious concerns with how Policy LPA05 proposes to meet the overall housing requirement identified. Table 4.6 of the LP states that the 2017 Strategic Housing Land Availability Assessment (SHLAA) identifies a total

capacity of 7,817 dwellings from sites identified in the SHLAA between April 2017 and March 2035 (including windfalls).

The Consortium have reviewed the SHLAA sites that make up the identified supply and do not consider it to be justified nor effective plan-making to rely on these sites to meet this proportion of the housing need.

This representation discusses these concerns in the context of the following two areas of objection:

1 - Effectiveness of Strategy

The reliance on the identified SHLAA sites will result in a LP Strategy which is not effective and will not achieve sustainable development in the Borough. It will result in a skewed distribution of housing sites, overly focussed on the town centre and inner urban areas. What is more, a significant proportion of the SHLAA sites (77 of the 97 sites) will not be required to deliver any affordable housing, in line with Policy LPC02 of the emerging LP, meaning overall the LP will fail to deliver the identified need for affordable homes across the Plan Period.

Past delivery rates in St. Helens appear to have largely comprised of strategic development opportunities explicitly identified in the previous adopted Local Plan (for example Lea Green, Vulcan Works) rather than through any natural 'churn' in the availability of urban sites. This reinforces the point that in order to deliver the proposed annual requirement from sites identified in the SHLAA, the emerging LP must identify specific deliverable sites to achieve the required level of completions rather than rely on the market to deliver existing smaller scale urban brownfield sites.

2 - Realism of Delivery

The Consortium have serious concerns as to whether these sites can be considered to be deliverable and developable in accordance with national policy and accordingly, whether the Submission LP is justified in relying on them to meet housing needs as anticipated. An analysis of the SHLAA sites has revealed the following trends of uncertainty:

- 51 out of the 97 sites identified in the SHLAA do not have planning permission, equating to 2,899 dwellings. This amounts to 46% of the supply identified within the 15 year period (excluding windfall allowance). The principle and achievability of housing on these sites in terms of technical considerations has therefore not been demonstrated in any detail;

- Around 23% of the 'outstanding capacity' identified over the Plan Period in the SHLAA is currently in active alternative uses (for example a community centre, allotments, scrapyard, car repair garage). There is insufficient evidence to give confidence that these sites will become available despite these active uses and it is considered unrealistic to expect all of these sites to be made available for housing as anticipated;
- Many of the SHLAA sites are identified as facing significant technical constraints likely to have impacts on net developable area. Whilst these constraints might not necessarily preclude the development of the sites for housing, it further brings doubt as to whether development of these sites is likely to be considered viable in the future, especially when the size and location of the sites means viability is already likely to be challenging;
- The SHLAA identifies landownership constraints facing several of the sites. Multiple or unclear landownerships can create major delays in bringing a site forward for development, with protracted legal processes and discussions;
- It is also concerning that the majority of the sites in the SHLAA are in areas of the Borough that have been identified through the Economic Viability Assessment (December 2018) prepared to inform the Local Plan as having viability constraints. Given the small size of many of the sites, this again raises concerns that it is wholly unrealistic to anticipate all, or even most, of these sites will be delivered.

The above highlighted trends demonstrate how, for a significant proportion of the sites being relied on to deliver housing need over the plan period, the prospects that these sites will come forward as required is uncertain at best. Through a review of the SHLAA sites, the Consortium consider that at least 1,173 dwellings should be removed from the supply identified from the SHLAA as coming forward over the Plan Period. This reduces the amount of identified supply from the urban area to 5,114 dwellings. This will be considered in more detail within these representations.

Conclusions and Recommendations

In light of the above concerns, it is the Consortium's view that additional Green Belt land for at least 3,560 dwellings must be identified for release over the Plan Period in addition to that which is currently being proposed. This is essential in order to ensure a **sound** and deliverable Local Plan Strategy which will meet the housing needs for the Borough, as required in the NPPF.

1.0 Introduction

- 1.1 This representation is prepared by Nexus Planning on behalf of Consortium comprising of Story Homes, Wainhomes and Eccleston Homes (hereafter referred to as “the Consortium”). The parties in the Consortium have made separate representations in relation to these specific land interests.
- 1.2 This representation has been prepared jointly on behalf of the parties to raise shared fundamental concerns in relation to the Submission Local Plan (hereafter referred to as the “Submission LP”). Specifically, the Consortium share concerns that in identifying a housing requirement of 486 dwellings per annum (dpa) over the Plan Period, the Submission LP is failing to plan for the objectively assessed needs for housing in the Borough, as required by Paragraph 11 of the National Planning Policy Framework (NPPF) (2019).
- 1.3 In addition, the Consortium consider that the Submission LP is over-reliant on sites identified through the Strategic Housing Land Availability Assessment (SHLAA), which are predominantly within the existing urban area. It is submitted that there is a high likelihood these sites will not deliver as anticipated, meaning the LP will be ineffective in meeting housing needs over the period. These representations also consider how the proposed reliance on the sites within the SHLAA, will result in a LP strategy that does not deliver the type of housing needed in the right locations. In over-estimating the amount of land likely to be delivered from SHLAA sites, it is the Consortium’s view that the Council are failing to identify sufficient land outside of the existing urban areas and within the Green Belt to meet future housing needs.
- 1.4 In light of these concerns, it is submitted that the Submission LP as drafted is unsound with regard to the tests set out in Paragraph 35 of the NPPF.

1.5 The Submission LP is considered unsound because it is not:

- **Positively prepared** – contrary to the requirements of Paragraph 35, the Submission LP does not *'provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs'*;
- **Justified** – the strategy proposed in the Submission LP is not considered to be justified by the evidence in relation to likely yields from the urban sites;
- **Effective** – the Submission LP fails to provide an effective or deliverable strategy for ensuring sustainable growth across St. Helens in the Plan Period;
- **Consistent with national policy** – with regard to the above, the Submission LP is not consistent with national policy.

Structure of Representations

1.6 These representations specifically relate to Policy LPA05: Meeting St. Helens Borough's Housing Needs. They are structured as follows:

- Section 2: Housing Need (Policy LPA05)
- Section 3: Housing Land Supply (Policy LPA05 and Table 4.6)

2.0 Housing Needs – Policy LPA05

- 2.1 In this section, we set out the Consortium’s view that the housing requirement identified for St. Helens in Policy LPA05 does not represent objectively assessed needs as required by the NPPF, and therefore cannot be considered sound.
- 2.2 In accordance with the requirements of the NPPF (2019) (namely paragraph 11, and 60) and the Planning Practice Guidance (PPG) (ID: 2a-002) the LP should contain a housing requirement that at least delivers the standard methodology minimum housing figure for St. Helens. The St Helens SHMA Update, January 2019 (SHMA Update 2019), outlines that from the base year of the LP (2018) that the standard methodology figure for St Helens is 482 dwellings per annum (dpa). We support this calculation given this is the base year of the LP.
- 2.3 With LP Policy LPA05 setting a minimum housing requirement of at least 486 dpa over the period 2016 to 2035, the LP marginally provides a higher housing figure than the standard methodology minimum. However, the PPG is clear (ID: 2a-010) that:

“The standard methodology minimum figure does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*

- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests”.

2.4 In view of the above, we welcome the recognition by St. Helens Metropolitan Borough Council (SHMBC) that a higher housing requirement is needed to support planned economic growth and to assist addressing the long term trend of declining affordability (LP paragraph 4.18.5). However, as set out within the remainder of this section, we have fundamental concerns over the soundness (NPPF, paragraph 35) of the approach taken to determine the Policy LPA05 housing figure. Our concerns principally focus on:

- a) Achieving sustainable and balanced population growth (a LP key issue, part of the overarching LP spatial vision and LP Key Strategic Aim 1);
- b) The Policy LPA05 housing figure is significantly lower than previous level of planned and delivered housing; and
- c) The level of housing required to support planned economic growth.

Sustainable Population Growth

2.5 A key element of the overarching LP Vision (paragraph 3.1.1) and Strategic Aim 1 (paragraph 3.2.1) is to support the achievement of sustainable and balanced population growth. A key aspect of national policy towards achieving sustainable development (NPPF paragraph 8) is also to support strong vibrant and healthy communities.

2.6 As outlined within the St. Helens Regulation 18 LP, the Borough has experienced longstanding historical socio-economic issues which culminated in a declining, but aging population structure:

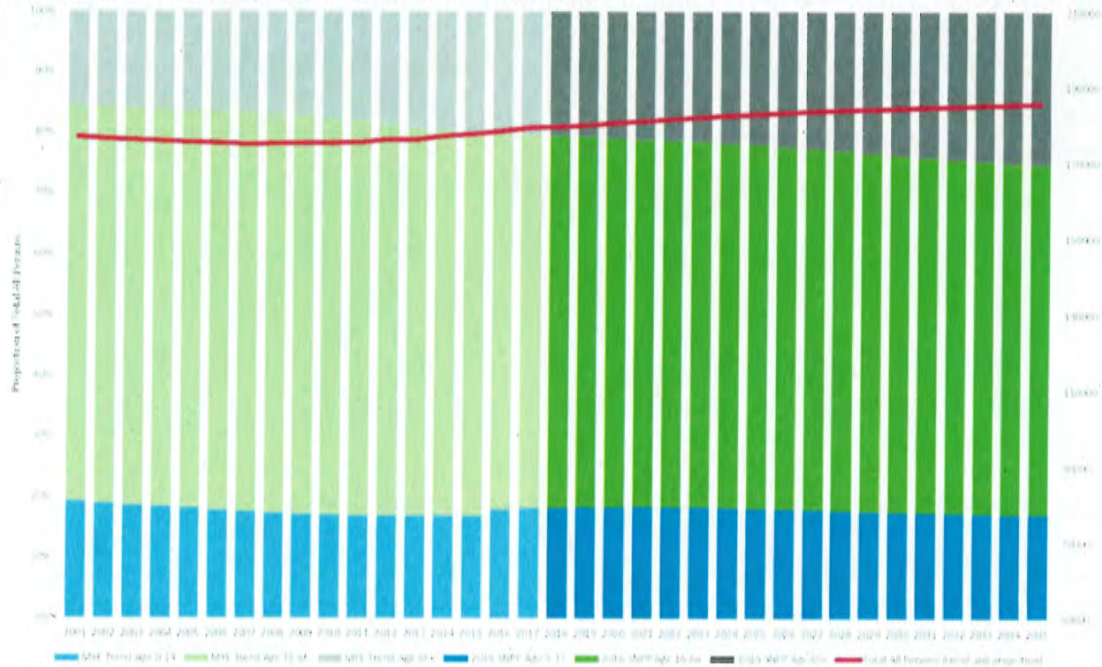
“The resident population of St. Helens is 177,612 (2015 ONS Mid-year Estimate), with the population expected to grow steadily over the next 10-20 years albeit at a slower rate than the

North West and England. Through the 1980's, 1990's and the early years of the 2000's, St. Helens had a consistently declining population [added emphasis], reducing from 190,800 persons in 1981 to 180,100 in 1991 to 176,800 in 2001. However, since 2007, the local population has increased at a modest average population growth rate of 0.2 percent per annum (Regulation 18 LP, paragraph 2.5).

St. Helens has an aging population structure similar to England, but with a higher proportion of people aged 65 years and over and proportionally fewer people of working age (16-64 years) [added emphasis]. Over the next 25 years, the number of residents in their 80s is expected to almost double, from 6,700 in 2012 to 12,800 in 2037. The number of residents in their 90s is expected to almost triple from 3,600 to 9,700" (Regulation 18 LP, paragraph 2.6).

- 2.7 Having shifted in recent years towards a marginally positive population change position by the mid 2000's, SHMBC recognised, following a sustained period of structural socioeconomic decline, the importance of maintaining and supporting positive population change within the Regulation 18 LP. The policy on decision to increase the Mid Mersey SHMA, January 2016, full objectively assessed needs for housing (FOAN) figure (451 dpa) by 20% to 541 dpa within the Regulation 18 LP was made in part, by the recognition of need to continue to stabilise and increase the Borough's population (paragraph 4.101).
- 2.8 However, as illustrated within Graphic 1 below, of concern is that whilst St Helens has experienced positive population growth since 2007, which the 2016-based population projections (and the 2014-based population projections) project will continue over the period covered by the LP (albeit a rate of 0.2% per annum), the Borough's working age population (aged 15 to 65) is projected, based on demographic trends, to continue to meaningfully decline over the LP period (-0.2% per annum).

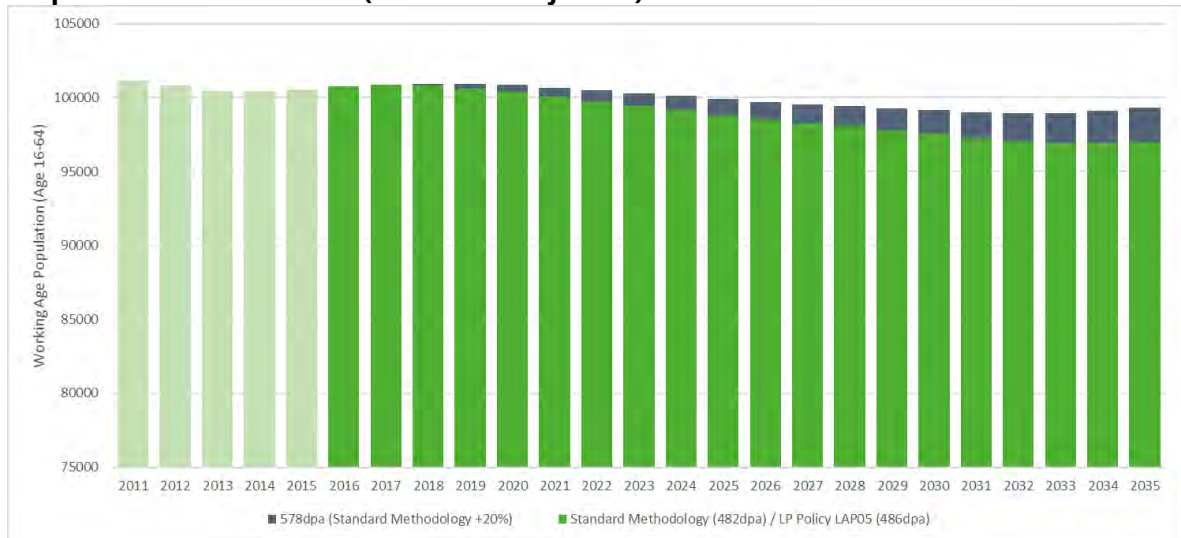
Graphic 1: St. Helens Population Change 2001 to 2035: Total Persons and Age Cohort Proportion of Total Persons (Trend and Projection)



Source: ONS Mid Year Estimates (2001 to 2015) and 2014-based Sub National Population Projections (2016 to 2035)

2.9 Utilising the industry standard POPGROUP demographic projection software, our analysis has also confirmed, as illustrated within Graphic 2 below, that delivery of the standard methodology figure (482 dpa) and also the LP Policy LPA05 figure (486 dpa) would also be insufficient to fully rebalance the Boroughs working age population by the end of the LP period. However, a housing figure of 578 dpa over the LP period, which represents a 20% uplift to the standard methodology figure (the same methodology applied by SHMBC within the Regulation 18 LP), would have the positive effect of significantly contributing towards stabilising the Borough’s working age population by the end of the LP period (2035). Increasing housing delivery to circa. 578dpa over the LP period would help newly arising working age households to stay within St Helens and also attract new working age population households to move into St Helens.

Graphic 2: St. Helens Population Change 2001 to 2035: Total Persons and Age Cohort Proportion of Total Persons (Trend and Projection)



Source: Nexus Analytics Demographic Modelling

2.10 For the reason set out above, the level of housing growth currently proposed within LP Policy LPA05 (486 dpa) demonstrably fails to support and deliver the LP’s overarching spatial vision and Strategic Aim 1 and the national policy objective (NPPF paragraph 8) of supporting strong vibrant and healthy communities. However, a Policy LPA05 housing requirement of 578 dpa, which is based on applying a 20% uplift to standard methodology figure (the approach SHMBC proposed within the Regulation 18 LP), would positively contribute towards delivering the LP Vision (paragraph 3.1.1) and Strategic Aim 1 (paragraph 3.2.1) which seeks to achieve sustainable and balanced population growth.

Housing Delivery

2.11 The PPG is clear that in determining the LP housing requirement in the context of the standard methodology minimum figure that consideration should be given to previous levels of housing delivery in the area, or previous assessments of need (PPG ID: 2a_010).

2.12 Within this context, it is noted that underpinned by the North West Regional Spatial Strategy (RSS) the St. Helens Local Plan Core Strategy, October 2012 (“the adopted LP”) albeit now time expired, contains a housing requirement of 570 dpa. A housing requirement meaningfully higher (88 dpa or 15%) than the standard methodology minimum.

2.13 Within the Regulation 18 LP, it is noted that part of the rationale for applying a further 20% uplift to

the SHMA assessment of FOAN was also "*to reflect the higher levels of housebuilding achieved in years before and after the 2008-2009 recession*".

- 2.14 Indeed informed by reference to the St. Helens Authority Monitoring Report 2011 (the most up to date monitoring report published by SHMBC), as set out within Table 1 below, in the pre-recession years the Borough achieved annual average housing completions of 636 dpa against a housing requirement of 570 dpa.

Table 1: SHMBC Housing Completions	
Monitoring Year	Net Completions
2003/04	631
2004/05	783
2005/06	530
2006/07	600
<i>2007/08 (Credit crunch)</i>	<i>436</i>
<i>2008/09 (Global Recession)</i>	<i>240</i>
2003/04 to 2006/07 average (Pre economic downturn)	636

Source: St. Helens AMR 2011, Table 9.3

- 2.15 Given that annual monitoring data post 2010/11 has not been published by SHMBC, we also have analysed the Ministry of Housing and Communities and Local Government (MHCLG) net additional dwellings housing supply data. Whilst net additions to the dwellings stock is not an exact comparator with local planning authority annual monitoring data (as illustrated by the differing figures for the 2003/04 to 2006/07 period within Table 1 above and Table 2 below), the MHCLG housing supply data does provide a useful approximate indication of post-recession housing delivery within St Helens.

Table 2: Dwelling Stock Estimates		
Monitoring Year	Net Additions to Dwellings Stock	Average Net Additions
2003/04	728	572
2004/05	607	
2005/06	442	
2006/07	512	
2007/08	348	220 (Recessionary Years)
2008/09	152	
2009/10	311	
2010/11	69	
2011/12	419	477
2012/13	264	
2013/14	551	
2014/15	632	
2015/16	575	
2016/17	487	
2017/18	408	
		531

Source: MHCLG Table 122

- 2.16 Excluding the key recessionary influenced years (2007/08 to 2010/11), the MHCLG data indicates that St Helens on average delivered 511 net additional homes between 2003/04 to 2017/18, with the past five years (2013/14 to 2017/18) achieving an annual average of 531 net additional homes.
- 2.17 **Given the above, it is demonstrably clear that an upward adjustment, similar to that SHMBC proposed within the Regulation 18 LP (i.e. a 20% uplift), is justified and necessary to the standard methodology minimum figure to reflect, in accordance with PPG guidance, higher levels of housebuilding achieved in years before and after the recession.**
- 2.18 A 20% uplift to the standard methodology minimum housing requirement would result in a housing requirement of between 578 dpa. It is noted that this figure is broadly equal to the housing figure within the adopted, but time expired, St. Helens Local Plan Core Strategy, October 2012 (570 dpa). A level of housing growth that SHMBC stated is "realistic as this target has been met in years 2013/14 and 2015/16" (Regulation 18 LP, paragraph 4.103).

①

Housing Demolitions

- 2.19 It is also noted that in addition to the 20% uplift to the SHMA 2016 assessment of FOAN, a further 29 dpa¹ was added to the housing requirement (541 dpa) within the Regulation 18 LP in order to ensure the required number of net additional houses was achieved. This cumulated in a proposed housing requirement figure of 570 dpa.
- 2.20 The need for a further 29 dpa to be added to the housing requirement figure was made in light of the fact that SHMBC monitoring evidence demonstrated that the loss of dwellings to demolitions and changes of use within the Borough averaged 26 dpa over the ten year period between 2006/07 and 2015/16 (Regulation 18 LP, paragraph 4.102). Given the nature of the Borough's housing stock and regeneration projects, SHMBC anticipate this long term monitoring trend will continue over the LP period.
- 2.21 Given the above, SHMBC must explain and justify what has changed since the Regulation 18 LP to justify not applying a 26 dpa uplift when deriving the LP Policy LPA05 housing requirement figure (486 dpa). As set out within Table 3 below, the LP Policy LPA05 housing figure (which is not accepted) with a 26 dpa demolitions adjustment would result in a LP housing requirement of 512 dpa, and 604 dpa based of the standard methodology figure with a 20% policy on uplift, as applied within the Regulation 18 LP, to:
- (i) Continue to stabilise and increase the boroughs population (a LP key issue, part of the overarching LP spatial vision and LP Key Strategic Aim 1);
 - (ii) Allow for more housing choice and competition;
 - (iii) Support planned economic growth; and
 - (iv) Reflect the higher levels of housebuilding achieved in years before and after the 2008-2009 recession.

¹ The increase from 26dpa to 29dpa appears to have been made on the basis of achieving a round housing requirement figure i.e. the 570dpa figure

Table 3: Housing Figure with 26 dpa Demolitions Adjustment		
Net Additional Housing Requirement		Housing Requirement with Demolitions Adjustment
Standard Methodology (2018 base year) with 20% uplift	578dpa	604dpa
LP Policy LPA05 Requirement (Job led Option 3, Scenario 2)	486dpa	512dpa

2.22 In light of the Council’s own monitoring evidence regarding the loss of existing housing stock via demolitions and estate regeneration projects, it is evident within Table 3 above, that whichever baseline net additional housing requirement figure is ultimately concluded as the most appropriate minimum housing figure, that the at least housing figure stated within LP Policy LPA05 must be higher (26dpa) in order to ensure the level of net additional homes delivered meets the LP target.

Supporting Economic Growth

2.23 The LP is clear (paragraph 4.18.7) that the LP Policy LPA05 housing requirement is a job-led figure that is directly linked to the employment site allocations in Policy LPA04. As referred above, the PPG outlines that uplifts to the standard methodology figure can be made, amongst other things, to support changing economic circumstances and reflect growth strategies (PPF ID: 2a-010). This job-led figure comprises a negligible uplift to the standard methodology minimum.

2.24 As previously referred, this level of housing growth will not support the LP vision and objectives, which seeks to achieve sustainable population growth over the LP period, as the Borough’s working age population will continue to decline. Furthermore, as set out below we are fundamentally concerned that the job-led housing figure is too low to support planned economic growth over the LP period. Our concerns principally focus on:

- (a) Level of projected none B Class employment growth; and
- (b) Discounting employment site potential.

Non B-Class Jobs

2.25 The SHMA Update outlines that the job-led scenarios tested are based on the Liverpool City Region Strategic and Employment Land Market Assessment, January 2017 (SHELMA) baseline economic forecast from Oxford Econometrics (OE) and the St Helens Employment Land Needs Assessment

(ELNA). The ELNA scenario forecast being based on jobs arising from the LP (B Class) employment sites allocations.

- 2.26 It is understood that the Growth Scenario within the SHELMA is broadly the ELNA scenario within the SHMA given that the SHELMA states (paragraph 6.2):

"The Growth Scenario is based on additional information provided by the Liverpool City Region LEP and each of the FEMA local authorities. ...In addition, local authority officials responsible for regeneration in each local authority provided details on future development projects and proposals for each respective area. This included information on time scales, likely levels of employment, and the type of employment (office, retail, leisure etc.) to be generated. Using this information, the LEP and Oxford Econometrics have modelled a growth scenario which assessed the potential economic impact."

- 2.27 Specifically regarding St Helens (and Liverpool City) the SHELMA confirms (paragraph 14.44) that the Growth Scenario takes account of site options or potential policy interventions.

- 2.28 In addition to jobs arising from the allocated (B Class) employment sites, the SHMA Update outlines that consideration has also been given to other (non B Class) employment over the LP period. A principle which we support. However, of concern is that the other 'non- B' Class job growth' has been underpinned by the Oxford Econometrics baseline economic forecasts as opposed to the 'non-B Class job growth' arising from the Growth Scenario forecast, which takes into account the wider job creation impacts arising from the proposed B Class employment site allocations.

Table 4: Baseline and Growth Scenario FTE Job Growth Comparison			
Sectors (grey shaded being those principally attributed to none B Class employment)	Baseline FTE Job Growth (2012-37)	Growth Scenario FTE Job Growth (2012-37)	Difference (2012-37)
Agriculture and Mining	0	100	100
Manufacturing	-1,700	2,400	4,100
Utilities	-100	0	100
Construction	1,200	1,300	100
Wholesale and Retail Trade	800	1,400	600
Transport, Warehouse and Postal	-200	6,900	7,100
Accommodation and Food Services	500	800	300
Media and IT	-300	-300	0
Professional and Scientific Services	800	1,100	300
Business Support Services	-300	-100	200
Public Administration and Defence	-700	-600	100
Education	0	100	100
Health	1,400	1,500	100
Creative and Recreation	500	600	100
Other	700	700	0
Total	2,600	15,900	13,300
Total None B Class	4,400	5,900	1500
Average Annual Non B Class	176	236	60

Source SHEMLA Table 15 and 16

- 2.29 Over the period covered by the LP, the implication of using the baseline scenario as opposed to the Growth scenario appears to have under assessed the projected non B Class employment growth by around 60 jobs per annum (circa. 1,140 non B Class jobs over the LP housing figure period). A difference that is likely to have meaningful implications to the overall job-led housing figure.
- 2.30 In view of this, prior to submission of the LP to the Secretary of State, SHMBC must either justify the approach it has taken within the SHMA Update, or update the job-led housing requirement analysis accordingly and consider the consequential implications to the Policy LPA05 housing figure.

Discounting Employment Site Potential

- 2.31 The SHMA Update outlines that three different employment site build out rate scenarios were considered:

Scenario 1: Develop as soon as possible – no allowances for delays due to factors such as infrastructure pinch points;

Scenario 2: Prioritisation of sites to allow for limits on market demand and construction capacity;

Scenario 3: Scenario 2 but factoring in possible infrastructure constraints.

- 2.32 Within the context of national policy (NPPF, paragraph 16b) requiring local plans to be prepared positively, in a way that is aspirational but deliverable, we would support Scenario 1 or Scenario 2. It is noted that Scenario 2 is the option selected by SHMBC. Notwithstanding our concerns above regarding the robustness of the level of projected non B Class job growth, the SHMA Update outlines (Table 7) that the Scenario 2 job-led housing figure would be 514 dpa. However, as referred above, once an appropriate housing demolitions adjustment is applied (a further 26 dpa), the resulting Scenario 2 housing requirement would be 537 dpa.
- 2.33 However, in addition to the build out rate scenarios, the SHMA Update assessed a further four economic sensitivity scenario options which considered particular employment site allocations proposed within the Regulation 18 LP, now not being taken forward into the LP. It is noted that the LP Policy LPA05 housing requirement is based on Scenario 2, Option 3 which omits Site EA1 (Omega South Extension, Bold) and Site EA4 (Land North East of Junction 23 M6, Haydock). Each of these employment site omissions is considered below:

Site EA1: Omega South Extension, Bold

- 2.34 The Omega South Extension, Bold Site is allocated within Policy LPA04 (Site reference 1EA). However, the rationale set out within the LP and the ELNA for excluding this site from the job-led housing requirement analysis is on the basis that although the site is located within the administrative area of Warrington, the site is intrinsically linked to the wider Omega Development Site located within Warrington. In view of this SHMBC conclude that all of the jobs arising from the Omega South Extension, Bold Site will be filled by Warrington residents. Given the location of the site, the rationale for discounting an element of the jobs arising from this site from the St. Helens job-led housing requirement does not appear unreasonable. However, the extent to which 100% of employees associated with this site will live within Warrington is considered questionable. We recommend that further consideration is given to this possibility and a small percentage allowance made to account for cross-boundary employment and housing relationships.

Site EA4: Land North East of Junction 23 M6, Haydock

- 2.35 The Land North East of Junction 23 M6 was proposed as an employment site allocation within the Regulation 18 LP. However, it is understood that SHMBC have not taken this site forward into the LP due to concerns regarding Junction 23 M6 highway capacity. However, there appears to be no evidence presented by SHMBC demonstrating that highway capacity is a justifiable reason to exclude this site coming forward over the LP period. The site was assessed as deliverable within all three of the employment growth trajectories within the ELNA. The principal of the sites suitability for employment use is confirmed by SHMBC as the site is safeguarded within LP Policy LPA06 (Site 2ES). Furthermore, there is demonstrable demand for this site to come forward given, as confirmed within the ELNA, an outline planning application has been submitted (Application Reference P/2017/0254/OUP). It is noted from the planning application consultation information that the applicant is working with Highway England to identify and agree any necessary strategic highway mitigation measures.
- 2.36 Given the above, and coupled with our concerns regarding the non B Class job growth assumptions, **we do not accept the robustness of the Scenario 2, Option 3 job-led housing figure (486 dpa), which forms the basis of the LP Policy LPA05 housing requirement.**
- 2.37 Without prejudice to our concerns regarding the robustness of the non B Class job growth assumptions applied within the SHMA Update, **we would conclude that based on the SHMBC's published evidence, that the unadjusted Scenario 2 job-led figure (514 dpa) would be the most justified economic-led housing requirement.** However, this figure would need to increase to 537 dpa to take account of the required housing losses to demolitions adjustment (26 dpa).

Recommended Changes

- 2.38 In view of the above, we consider that **as an absolute minimum, the LP Policy LPA05 figure needs to increase to 512 dpa in order to take into account housing losses through demolitions over the LP period.** However, we consider this level of housing growth would still however be insufficient to:
- (a) Support planned economic growth within the Borough over the LP period;
 - (b) Ensure the Boroughs working age population is stabilised over the LP period; and

(c) Adequately reflect previous levels of housing delivery.

2.39 Of all of the job led scenarios assessed within the SHMA Update, **we consider that the unadjusted Scenario 2 is the most credible over the LP period to support planned economic growth.** With the application of the demolitions adjustment the Scenario 2 job-led housing figure would be 537 dpa. However, we are mindful that this job-led housing scenario:

(a) Under assessed non B Class jobs growth over the LP period;

(b) Fails to adequately reflect previous levels of housing delivery; and

(c) Fails to ensure the Boroughs working age population is stabilised over the LP period.

2.40 Overall, for the reasons set out above, and more importantly for the Regulation 18 LP (namely paragraph 4.101), **we consider the most appropriate housing requirement for St. Helens over the period covered by the LP is 604 dpa.** This figure being the standard methodology figure with a 20% policy on uplift and a further 26 dpa demolitions adjustment.

2.41 A LP Policy LPA05 housing figure of 604 dpa would:

(i) Continue to stabilise and increase the boroughs population (a LP key issue, part of the overarching LP spatial vision and LP Key Strategic Aim 1);

(ii) Allow for more housing choice and competition;

(iii) Support planned economic growth; and

(iv) Reflect the higher levels of housebuilding achieved in years before and after the 2008-2009 recession.

3.0 Housing Land Supply – Policy LPA05 and Table 4.6

- 3.1 As well as the above comments about the identified housing requirement figure, the Consortium also share fundamental concerns with how the Submission LP proposes to meet the overall housing requirement identified. In particular, the amount of housing expected to be delivered from the urban area.
- 3.2 Policy LPA05 and Table 4.6 of the Submission LP describes how the housing requirement will be met from the following sources:
- a) *Completions;*
 - b) *Sites with planning permission;*
 - c) *Housing allocations shown on the Policies Map and listed in Table 4.5;*
 - d) *Sites without planning permission identified in the Strategic Housing Land Availability Assessment (SHLAA); and*
 - e) *'Windfall' development, including development on small sites not individually identified in the SHLAA, sub-division of dwellings and conversions/changes of use.*
- 3.3 Paragraph 4.18.10 of the Submission LP sets out that a key priority for the Plan is to maximise housing delivery on previously developed ('brownfield') land within existing urban areas. It states that the SHLAA 2017 identifies a total capacity of 7,817 dwellings from sites within the urban area between 1st April 2017 and 31st March 2035.
- 3.4 It is on the basis of this 'urban supply' figure that the Council have calculated how much of the overall housing requirement must be delivered on sites outside of the existing urban areas, and specifically therefore how much land should be released from the Green Belt.
- 3.5 The preparation of the Local Plan presents a vital opportunity to review the Green Belt boundaries within St. Helens. The Consortium welcome and strongly support the Council's acknowledgement that not all of the Borough's future housing needs can be met within the existing urban areas and that exceptional circumstances exist, in line with paragraph 136 of the NPPF, to justify the release of Green Belt land within the next Plan Period. Paragraph 136 is clear that Green Belt boundaries should only be altered through the preparation or updating of plans.

3.6 It states:

"Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period."

3.7 Paragraph 139, Part e) states that when defining Green Belt boundaries, plans should:

"be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period."

3.8 In this context, it is **essential** for the future of the Borough that the Submission LP takes the opportunity afforded to get decisions about future Green Belt boundaries in St. Helen's right.

3.9 The Consortium support the principle of directing development to previously developed land. However, Paragraph 23 of the NPPF sets out how:

"Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period."

3.10 The Consortium have significant concerns that the strategy being proposed in the Submission LP, considerably over-estimates the number of dwellings that are realistically likely to come forward on previously developed land over the plan period. In doing so, it is the Consortium's view that the Council are failing to identify sufficient land outside of the existing urban areas and within the Green Belt to meet future housing needs. In this way the strategy set out in Policy LPA05 fails to plan effectively for the future and is not consistent with national policy which requires plans to bring sufficient land forward to meet housing needs, and secure the long term permanence of Green Belt boundaries.

3.11 The following analysis confirms why this is the case.

Housing Land Supply identified in the SHLAA 2017

3.12 Despite the SHMA relating to the 2016 to 2035 period, the Plan Period proposed in the Submission LP is the 15 year period 2020-2035. In calculating housing requirement over the 'Plan Period', Table 4.6 of the Submission LP therefore seeks to discount expected completions up to 2020 (which is estimated to be 1,989 dwellings) to find a residual requirement of 7,245 dwellings (between 2020-

2035) left to plan for. The supply then identified to meet this requirement is based on the 2017 SHLAA, which covers the period 2017 to 2033. This overlap of different periods has led to an unnecessarily complex and confused calculation of requirements and supply set out in Table 4.6 of the Submission LP (replicated below), whereby it is not always entirely clear which period is being referred to. It is recommended that the calculations in the Submission LP should be clearly set out in relation to the period 2016 – 2035, and that is the approach we seek to take later in these representations.

Table 4.6: Housing land requirements and supply – 2016 until 2035

Requirements	Dwellings
a) St.Helens housing requirement (19 years from 1 Apr 2016 to 31 Mar 2035) at average of 486 per year	9,234
b) Expected completions by 1 Apr 2020	1,989
c) Residual requirement over Local Plan period from 1 Apr 2020 to 31 Mar 2035	7,245 ²⁹
d) Anticipated supply	
e) Total SHLAA supply– 1 Apr 2017 until 31 Mar 2035	7,817 ³⁰
... consisting of:	
f) Large sites (0.25ha or 5 units and above) - planning permission not started as of 1 Apr 2017	1,581 ³¹
g) Large sites with planning permission under construction as of 1 Apr 2017	654
h) Large sites with planning permission but stalled as of 1 Apr 2017	289
i) Large sites - identified by 2017 SHLAA, no planning permission as of 1 Apr 2017	4,107
j) Small sites (below 0.25ha / 5 units) (small sites / "windfall" allowance)	1,395
k) Estimated SHLAA supply – 1 Apr 2020 until 31 Mar 2035	6,344 ³²
l) SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18)	794
m) Residual SHLAA capacity over 15 year Plan period (1 Apr 20 - 31 Mar 35)	5,550 ³³
n) Required capacity to be found on Green Belt land	1,695
o) Required capacity of sites with 20% increased allowance for sites to be removed from the Green Belt (site allocations 5HA to 15HA inclusive) (to allow for contingencies e.g., infrastructure provision, delays, lead-in times to start of housing delivery etc.)	2,034
p) Total capacity of allocated sites removed from the Green Belt (sites 1, 2, 4, 5, 7 and 8 HA) (1 Apr 20 - 31 Mar 35)	2,056
q) Total supply over plan period³⁴	7,606

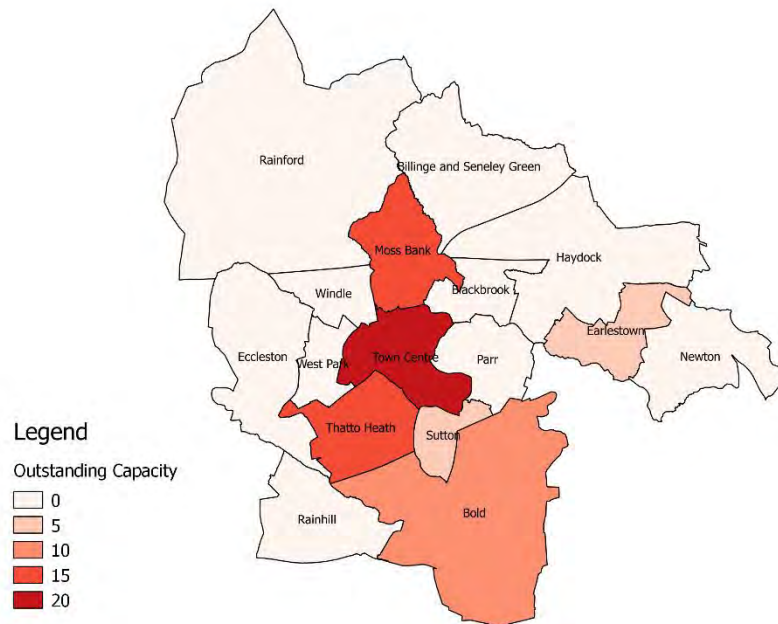
- 3.13 The Consortium have reviewed the SHLAA sites that make up the identified supply and have serious concerns that it is not justified nor effective plan-making to rely on all of these sites to meet housing needs to the level anticipated.
- 3.14 This section discusses these concerns in the context of the following two areas of objection:
- **Effectiveness of Strategy.** The reliance on the identified SHLAA sites will result in a LP Strategy which is not effective and will not achieve sustainable development.
 - **Realism of Delivery.** The Consortium have serious concerns as to whether these sites can be considered to be deliverable and developable in accordance with national policy and, accordingly, whether the Submission LP is justified in relying on them to meet housing needs as anticipated. Appendix A contains an overview of the 97 sites identified as deliverable and developable within the SHLAA, highlighting those particular sites that raise doubts.

Effectiveness of Strategy

Spatial Distribution of Sites

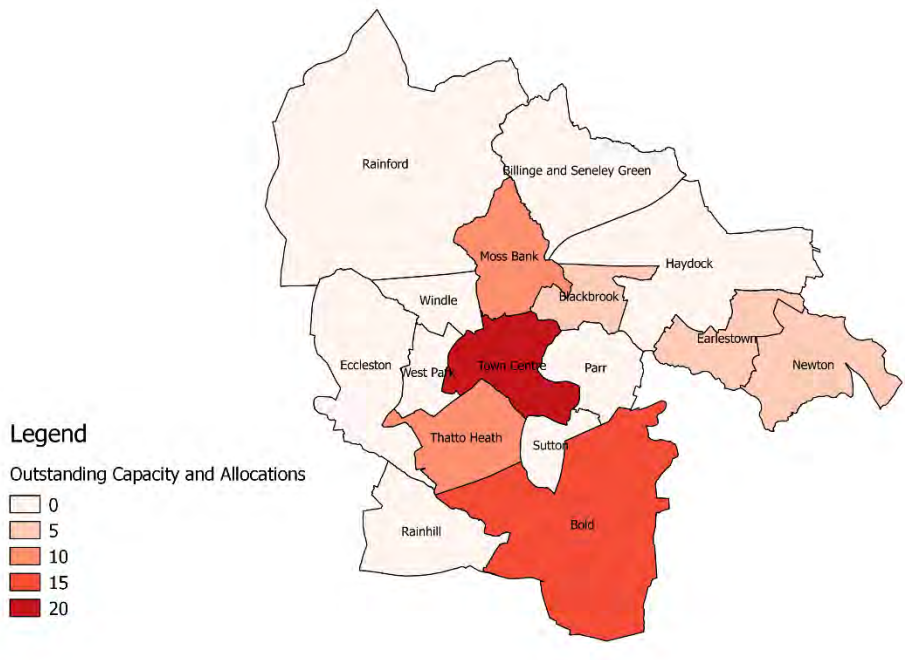
- 3.15 Appendix 5 of the SHLAA sets out the Development Trajectory of sites from the SHLAA over the next 15 years (2017/18 – 2032/33). The sites identified in Appendix 5 total 6,287 dwellings.² Graphic 3 below demonstrates how 68% of this 'outstanding capacity' is concentrated in 4 wards, 3 of which are within the central part of St. Helen's Core Area: Town Centre (26%), Moss Bank (15%), Thatto Heath (16%) and Bold (11%). It is evident that relying on the sites identified through the SHLAA will result in skewed distribution of new housing across the Borough – with growth focussed within these inner urban areas at the expense of the edge of the Core Area and the outlying settlements.

² This is a total of the 'outstanding capacity' figure for all the sites, adjusted to account for 405 dwellings from Site. 111 (in accordance with the trajectory set out in the SHLAA).



Graphic 3: Map showing percentage of SHLAA capacity in each Ward

- 3.16 Graphic 4 below shows the distribution of dwellings over the Plan Period, if the proposed Green Belt allocations are added to the overall capacity from the SHLAA. It continues to show a clear imbalance in housing distribution across the Borough which is still not rectified through the proposed Green Belt allocations. It is submitted that by over-relying on SHLAA sites which are concentrated within only a few parts of the Borough, **the Submission LP is prevented from delivering a more balanced spatial distribution of growth.**
- 3.17 As we go on to demonstrate, this approach is not justified or necessary. The proposed distribution of housing will not effectively meet the range of housing needs required in the Borough, explicitly for both market and affordable need in different parts of the Borough.



Graphic 4: Map showing percentage of Total Supply in each Ward (including Green Belt Allocations)

Affordable Housing Provision

- 3.18 The St. Helens SHMA Update 2018 identified that there is a need for 1,987 affordable housing units to be delivered in the Borough between 2016 and 2033, at an average of 117 units per year. Paragraph 6.3.3 of the Submission LP sets out how extending this until the end of the Plan Period means that out of the overall housing requirement of 9,234 dwellings, approximately 2,223 dwellings should be affordable.
- 3.19 The Economic Viability Assessment (December 2018) prepared by Keppie Massie to inform the LP identifies the quantum of affordable housing likely to be viable in different parts of the Borough and concludes that delivery of affordable housing is anticipated to be a significant issue in much of the Borough. It is on the basis of this evidence that the Submission LP Policy LPC02 sets a 0% affordable requirement for all brownfield sites, except those within the areas of Eccleston, Rainford and Rainhill as detailed in Table 4 below.

3.20 The affordable housing requirement established under Policy LPC02 is set out in Table 6.3 of the Submission LP, which is replicated below.

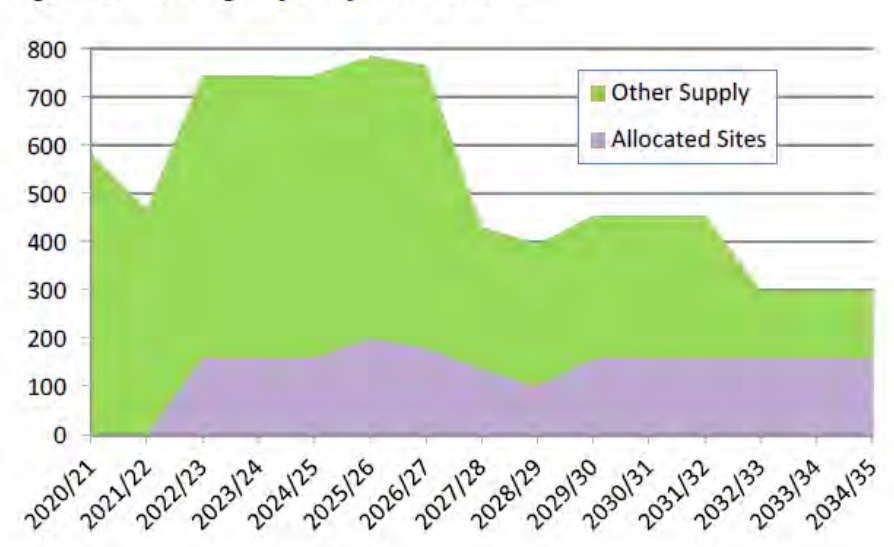
Table 4: Submission LP Affordable Housing Requirement		
Affordable Housing Zone	Areas include	Affordable Housing Requirement
1	Town Centre and Parr wards	No affordable housing requirement due to viability constraints
2	Blackbrook, Bold, Earlestown, Haydock, Sutton, Thatto Heath, West Park Billinge & Seneley Green, Moss Bank, Newton, Windle	30% requirement on greenfield sites 0% requirement on brownfield sites
3	Eccleston, Rainford, Rainhill	30% requirement on greenfield sites 10% requirement on brownfield sites

3.21 Based on this, the table below sets out that **77 of the 97 sites identified in the SHLAA, will not be required to provide any affordable housing.**

Table 5: Affordable Housing from SHLAA Sites		
	Number of Sites from 2017 SHLAA	Number of Affordable Dwellings to be Provided
0% requirement	77	0
10% requirement	2	13
30% requirement	18	341
Total	97 sites	354 dwellings

3.22 This shows that through **an over-reliance on sites within the urban area, a large proportion of the overall housing land supply identified through the Submission LP will barely contribute towards meeting affordable housing needs.** Figure 4.3 of the Submission LP does not anticipate any of the allocated sites coming forward until 2021/22, so a lack of affordable provision from the 'other supply' sites will particularly impact the early part of the Plan Period.

Figure 4.3: Housing Trajectory – Year to Year



Graphic 5: Housing Trajectory Year to Year - Submission LP (Figure 4.3)

3.23 Whilst the proposed Green Belt allocations will all be required to provide affordable housing, provision of 30% to this source (which amounts to 2,056 dwellings) will only result in the provision of 617 affordable dwelling from Green Belt allocations. Added to the 354 expected from the SHLAA sites this will still only amount to a total of 971 affordable dwellings over the Plan Period and this is assuming all the SHLAA sites deliver as anticipated. This represents a significant shortfall against the 2,223 affordable dwellings required.

3.24 **The above analysis further highlights the importance that a larger number of deliverable and viable greenfield sites are identified in order to maintain the continued delivery of affordable housing across the Borough and throughout the Plan Period, in line with the need identified.**

Realism of Delivery

- 3.25 The recently revised NPPF (2019) has confirmed the definition of what constitutes a deliverable and developable site. Annex 2 of the NPPF (2019) defines 'deliverable' as:

"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

- 3.26 It goes on to define 'developable' as:

"Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

- 3.27 The Planning Practice Guidance (PPG) requires that:

"strategic policy-making authorities will need to provide robust, up-to-date evidence to support plan preparation. Their judgements on deliverability of housing sites, including windfall sites, will need to be clearly and transparently set out."

- 3.28 Whilst we appreciate that conclusions in relation to each site are to some extent a matter of planning judgement, **the concerns we have with specific sites add up to create an overall picture that delivery from a significant number of the SHLAA sites is highly uncertain.** This is with regard to the following trends.

Planning Status

- 3.29 Of the 97 sites identified as deliverable and developable in the SHLAA, and identified as having an outstanding capacity of 6,287 dwellings over the Plan Period; 51 sites (equating to 2,899 dwellings)

do not have planning permission. The principle and achievability of housing on these sites in terms of technical considerations has therefore not been demonstrated in any detail as is considered later.

- 3.30 Particular doubts are raised as to the deliverability of these sites, when it is considered that many have long been identified in the Council's evidence base as suitable for housing yet have still not come forward in that time. By way of example, 853 dwellings now being relied on to come forward in the Plan Period, were similarly anticipated to come forward within 0-5 years when assessed in the 2012 SHLAA (therefore before 2017/18). The anticipated delivery of these sites has slipped considerably therefore, suggesting constraints or lack of market demand. **Little to no evidence has been provided to demonstrate why the delivery of these sites would not slip again, raising serious doubts as to whether these sites can now be relied upon to make up the required supply over the plan period.**

Active Uses

- 3.31 Around 23% of the 'outstanding capacity' identified in the SHLAA (equating to 1,439 dwellings) are currently in active alternative uses, including several where planning policy would seek to restrict redevelopment for housing. By way of example, these include 'Land west of Vista Road', Ref. 87 which is currently in use as a scrap yard and 'Derbyshire Hill Family Centre', Ref. 129 which is an active community centre. There is insufficient evidence to give confidence that these sites will become available despite these active uses and it is considered unrealistic to expect all of these sites to be made available for housing as anticipated. This is especially given that alternative locations/premises would need to be identified and secured, taking considerable time.
- 3.32 As well as technical deliverability, we would also question the *desirability* that all of the identified sites are developed for housing, given the need to also maintain land for employment and community uses, and to maintain an acceptable level of amenity for both future and existing residents of the Borough. There are several identified sites (for example 'Land at Newby Place, Ref. 135', 'Land adjacent Church of Christ, Heather Brae, Ref.84' and 'Land at Waterdale Crescent, Ref. 63') which are noted to be open green space within existing residential areas. Whilst these spaces are not always designated as formal open space, it is apparent they have an important role to play for local communities as amenity green space in otherwise built-up parts of St. Helens. Development of these spaces will in many cases constitute undesirable 'urban-cramming' and would not be consistent with national policy, which seeks to protect open spaces (Paragraph 97, NPPF).

Technical Constraints

- 3.33 Many of the SHLAA sites are identified as facing significant technical constraints likely to have impacts on net developable area. For example 'Site of former 56-120, Eccleston Street, Ref. 59' is likely to have a severely reduced net developable area given its narrow shape and presence of mature trees on a prominent road frontage. Land at 'Milton Street, Ref. 91' is partly within Flood Zone 3. 'Land off Monastery Lane, Ref. HL189' has been stalled due to 'substantially unanticipated remediation costs'. Whilst the technical constraints identified might not necessarily preclude the development of the sites for housing, it further brings doubt as to whether development of those sites is likely to be considered viable in the foreseeable future, especially when the size and location of the sites means viability is already likely to be challenging.
- 3.34 We also note 11 sites for which the SHLAA identifies landownership complications as a potential constraint. Multiple or unclear landownership can create major delays in bringing a site forward for development, with protracted legal processes and discussions. Whilst many of these sites have been identified as deliverable in years 1 to 5, there is no 'clear evidence' that this is the case as required by Annex 2 of the NPPF.

Viability

- 3.35 It is also concerning that the majority of the sites (77 of the 97 sites identified in the SHLAA) identified in the SHLAA are in areas of the Borough that have been identified through the Economic Viability Assessment (December 2018) as having viability constraints (Affordable Housing Zone 1). Given the small size of many of the sites, this again raises concerns that it is wholly unrealistic to anticipate all, or even the majority, of these sites will be delivered.

Summary on Realism of Delivery

- 3.36 The above highlighted trends demonstrate how, for a significant proportion (estimated to be at least a third) of the sites being relied on to deliver housing need over the plan period, their deliverability is uncertain at best. With regard to the above considerations, the individual assessment of sites within Appendix A provides our assessment as to whether the specific sites can be considered deliverable or developable in line with the Council's anticipated trajectory. It is clear from this Appendix and from the discussion above that **there are several sites which are not considered to be deliverable and**

developable such that it is not justified or sound to include them in the Council's supply calculations under Policy LPA05.

- 3.37 With regard to the site-specific considerations set out in Appendix A, **the Consortium consider that at least 1,173 dwellings should be removed from Council's total estimated supply figure from the SHLAA.**

Non-Delivery Rate

- 3.38 The Submission LP applies a non-delivery rate of 15% to the identified SHLAA capacity. The Consortium strongly support the application of a rate of non-delivery. DCLG analysis³ has indicated that between 10-20% of planning permissions are not implemented, whilst a further 15-20% are subject to a revised application process which delays delivery. Given this, the consortium agree it is essential that a non-delivery rate of at least 15% is applied to any supply that is identified at the stage of plan-making.
- 3.39 We are also mindful that the SHLAA applies assumptions about lead-in times and built out rates which may not be accurate for every site. In the Consortium's experience, the larger brownfield sites in particular often face protracted lead-in times due to the timescales associated with relocating existing uses, demolition and land remediation costs.

³ Presentations to the HBF Planning Conference (September 2015)

Revised Calculation of Housing Land Supply

3.40 As set out above, the approach taken in Table 4.6 of the Submission LP (replicated above) in respect of Plan Period leads to an unnecessarily confused calculation of requirement and supply, compounded by the fact the figures given in the LP rely on the SHLAA to identify the supply figures which cover a different period 2017-2032 to the Local Plan. Accordingly, we set out below what we would consider a more straightforward approach - that is of setting out the calculation and anticipated supply in relation to the full period 2017 – 2035.

Table 6: Nexus Calculation of Requirement and Supply		
		604 dpa scenario
a)	Housing requirement (19 years from 1st April 2016 to 31 March 2035) based on needs range identified in Section 2.	11,476
b)	Expected completions in 2016/17 ⁴	489
c)	Residual requirement over Period from 1 April 2017 to 31 March 2035 (a-b)	10,987
d)	Estimated Capacity from SHLAA 2017-2035	5,114
e)	Estimated Capacity from SHLAA with 15% reduction for non-delivery (applied to years 6-18 only)	4,634
f)	Windfalls (93 dpa x 18 years)	1,674
g)	Total non-Green Belt Supply 2017 – 2035 (e+f)	6,308
h)	Required capacity to be found on Green Belt Land ⁵ (c-g)	4,679
i)	Required capacity to be found on Green Belt Land with 20% increased allowance	5,615

⁴ Table 3.12 of SHLAA

3.41 This calculation leads to the following conclusion regarding the amount of *additional* Green Belt land the Submission LP should be seeking to identify for release over this Plan Period.

Table 7: Calculation of Additional Green Belt land required	
	604 dpa scenario
Current allocated Green Belt land ⁶	2,056 dwellings
Additional Green Belt land required	3,559 dwellings
Total	5,615 dwellings

⁶ Table 4.5 of the Submission LP

4.0 Conclusions

- 4.1 This representation is prepared by Nexus Planning on behalf of a consortium of landowners and housebuilders with various land interests across the Borough of St. Helens (referred to as “the Consortium”).
- 4.2 It has set out significant concerns the Consortium share that the Submission LP, as currently drafted **is not sound**. Specifically, that **the housing requirement of 486 dpa over the Plan Period, as identified in the Submission LP does not represent the objectively assessed needs for housing in the Borough**, as required by Paragraph 11 of the NPPF. It is submitted that **Policy LPA05** should instead be identifying a housing requirement of **604dpa**.
- 4.3 What is more, the Consortium consider that the Submission LP is over-reliant on sites identified through the Strategic Housing Land Availability Assessment (SHLAA), which are predominantly within the existing urban area. A significant proportion of these do not have planning permission, have currently active uses, have been identified for housing since the 2012 SHLAA without coming forward and are in areas facing viability constraints as evidenced by the Council’s own viability assessment. **The Consortium consider there is a strong possibility that a high proportion of the SHLAA sites will not deliver as anticipated, meaning the LP will be ineffective in meeting housing needs over the period.**
- 4.4 These representations have also considered how **the proposed reliance on the sites within the SHLAA, will result in a LP strategy that does not deliver the type of housing needed, in the right locations**. In over-estimating the amount of land likely to be delivered from SHLAA sites, it is the Consortium’s view that the Council are failing to identify sufficient land outside of the existing urban areas and within the Green Belt to meet future housing needs.
- 4.5 In light of these concerns, it is submitted that the Submission LP as drafted is unsound with regard to the tests set out in Paragraph 35 of the NPPF.

4.6 The Submission LP is considered unsound because it is not:

- **Positively prepared** – contrary to the requirements of Paragraph 35, the Submission LP does not ‘provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs’;
- **Justified** – the strategy proposed in the Submission LP is not considered to be justified by the evidence regarding the likely deliver rates from the urban area;
- **Effective** – the Submission LP fails to provide an effective or deliverable strategy for ensuring sustainable growth across St. Helens within the Plan Period;
- **Consistent with national policy** – with regard to the above, the Submission LP is not consistent with national policy.

Recommendations

- To be considered sound, Policy LPA05 should identify a housing requirement of 604 dpa.
- The Submission LP should significantly reduce the level of housing supply anticipated to be delivered through those sites identified in the existing urban area.
- With regard to the detailed site analysis work undertaken, it is recommended that the Submission LP should be seeking to identify Green Belt land for at least an additional 3,560 dwellings over the Plan Period.

Appendix A: Analysis of Supply from SHLAA Sites

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery				Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Oustanding capacity	0-5 yrs	6-10 yrs	11-15 yrs				0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
1	Land rear of 1-27 Station Road	Haydock	Greenfield	0.40 ha	12	12	0	0	SHLAA_20 17	Deliverable: There are no policy constraints that would make the site unsuitable for housing, but investigations would need to be carried out to establish suitability of ground conditions prior to development. There has previously been developer interest in this site and it is likely to be financially viable to develop. The site has previously benefitted from outline consent. New enquiry for pre-application advice has been received.	There are no policy constraints to delivering residential development at this location and there are no known legal constraints. A number of recent pre-application enquiries indicate developer interest of the site. 2012 SHLAA considered site deliverable in 0-5 years, however no progress to date. In the absence of evidence that the site of an application, the deliverability of the site has been moved to 6-10 years.	12	0	0	12
3	Land rear of 14 to 20 Weymouth Avenue	Parr	Brownfield	0.36 ha	14	0	14	0	SHLAA_20 17	Developable: The site is a cleared former housing site and has previously benefitted from planning permission for residential development. It forms part of a cluster of sites (3,4,5). There has previously been developer interest in this site and it is likely to be financially viable to develop. Flood risk assessment would be required as the site is within Flood Zone 2.	The site together with site ref. 4 and 5 has planning permission for 52 homes (P/2016/0923/FUL) approved in September 2017. No DoC applications have been submitted and work on the site has not yet started. As such it is not reasonable to assume that the larger figure of 52 homes can be expected to come forward until such a time when the developer shows interest in developing the site. The trajectory in the 2017 SHLAA is therefore retained.	0	14	0	14
4	Land Between 8 & 34 Portland Way and 161 & 123 Berry's Lane	Parr	Brownfield	0.28 ha	11	0	11	0	SHLAA_20 17	Developable: The site is a cleared former housing site and has previously benefitted from planning permission for residential development. It forms a cluster of sites (refs 3, 4 and 5) that could be brought forward for development as a group. A flood risk assessment would be required as this site is within Flood Zone 2. There are some protected trees along the main frontage of the sites. There has previously been developer interest in this site and it is likely to be financially viable to develop.	The site together with site ref. 4 and 5 has planning permission for 52 homes (P/2016/0923/FUL) approved in September 2017. No DoC applications have been submitted and work on the site has not yet started.	0	11	0	11
5	Land Between Weymouth Avenue & Berry's Lane	Parr	Brownfield	0.52 ha	18	0	18	0	SHLAA_20 17	Developable: The site is not close to a train station or high frequency bus route but is otherwise accessible and located in a sustainable location. Flood risk assessment required and sequential assessment. Site is a cleared former housing site and has previously benefitted from planning permission for residential development. It forms a cluster of sites (3, 4 and 5) that could be brought forward for development as a group.	The site together with site ref. 3 and 5 has planning permission for 52 homes (P/2016/0923/FUL) approved in September 2017. No DoC applications have been submitted and work on the site has not yet started. As such it is not reasonable to assume that the larger figure of 52 homes can be expected to come forward until such a time when the developer shows interest in developing the site. The trajectory in the 2017 SHLAA is therefore retained.	0	18	0	18
7	Land at Park Road	Town Centre	Brownfield	0.78 ha	28	0	28	0	SHLAA_20 17	Developable: The site is not close to a train station but is otherwise accessible and located in a sustainable location. There are no known legal or ownership issues. The site is a cleared former housing site owned by Helena Homes and there has previously been developer interest in the scheme.	The site has planning permission for 26 granted in 2017. Being built out by Kier.	26	0	0	26

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery			Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery				
					Outstanding capacity	0-5 yrs	6-10 yrs				11-15 yrs	0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
9	Moss Nook Urban Village, Watery Lane	Town Centre	Brownfield	26.74 ha	802	0	401	401	SHLAA_20 17	2017 identifies the sites as developable over the next 6-1 years. There has previously been developer interest in this site; due to the size of the site it is likely to come forward in different phases, delivered by different developers. The provision of on site secondary infrastructure may reduce the overall viability of the site.	The delivery of a strategic residential-led development at Moss Nook has been a long-standing aspiration. As far back as the 1998 UDP, the site was safeguarded for residential use post 2001. The site was identified as one of two 'urban villages' in the Core Strategy adopted in 2012. Planning permission for mixed use was granted on the site in 2006. Despite this long history, the site has failed to come forward for development and has suffered a history of stalled proposals. As recognised in the SHLAA the site faces challenging viability. It has been occupied in the past by a number of potentially contaminative uses including railway lines, a chemical works, former landfills, coal pits, colliery and concrete pipeworks. The site also includes the Beeches Playing Fields which may need to be relocated. The site faces significant constraints to development and has failed to come forward despite being identified as suitable for at least 20 years. In light of this, and in the absence of more robust evidence on delivery, it is not justified to rely on the site to deliver as many as 802 dwellings over the plan period. It is suggested a cautionary approach should be taken and only 401 dwellings included within the supply.	0	0	401	401
10	Land at junction of Sunbury Street and Fir Street	Thatto Heath	Brownfield	0.82 ha	32	0	32	0	SHLAA_20 17	Developable: Located in a sustainable location with no known policy/physical constraints and no known legal or ownership issues. There has been previous developer interest in the site, although there may be uncertain viability. Flats on site have recently been demolished on the northern part of the site.	An application (P/2018/0882/FUL) for 30 dwellings on site is awaiting decision. The development trajectory and capacity have been updated accordingly.	30	0	0	30
13	Land rear of Carnegie Crescent and Goodban Street	Parr	Brownfield	0.26 ha	7	0	7	0	SHLAA_20 17	Developable: The site is accessible and located in a sustainable location. There are no policy or known physical constraints that would make the site unsuitable for housing. Site is a cleared former garage site in Helen Homes ownership who have indicated that they still intend to develop it. No known legal or ownership issues.	The site is considered likely to have financial viability issues. The site is currently used as a car park. It is within the sole ownership of Helena Homes. The site is subject to an expired outline and reserved matters approval on the site from 2004 and 2006.	7	0	0	7
18	Land at Somerset Street and Sussex Grove	Parr	Brownfield	2.21 ha	66	0	66	0	SHLAA_20 17	Developable: The site is in an accessible location, with no policy/physical constraints or known legal or ownership issues. There has been previous developer interest in the site, and it is unlikely that there are financial viability issues. The site is in the ownership of Helena Homes.	In the 2012 SHLAA, the site was anticipated to come forward in the 0-5 year period. Despite this, there has been no activity on the site in this time. It is noted the site is an awkward shape and is likely to be constrained by the existing surrounding residential properties. Despite these concerns, the anticipated trajectory of the site has been accepted.	0	66	0	66
19	Leyland Green Road	Billinge & Seneley Green	Greenfield	0.53 ha	7	0	7	0	SHLAA_20 17	Developable The site is not close to a train station or high frequency bus route but is otherwise accessible and located in a sustainable location. The site is a vacant greenfield site with an expired planning permission, however the site slopes away from the road becoming very steep with reduces the developable area. The necessary infrastructure is considered to be available.	Topography of the site may limit viability of the site yet due to previous developer interest (expired planning permission from 2005) it is reasonable to expect the site to come forward in a later trajectory than the 2017 SHLAA identified. Site trajectory kept in 5 year period in 2012 SHLAA yet due to the lack of evidence that developer is interested in site it is not reasonable to expect it to come forward within 5 years.	0	7	0	7

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery				Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Oustanding capacity	0-5 yrs	6-10 yrs	11-15 yrs				0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
21	Land at Holly Bank Street	Town Centre	PDL/GF	1.28 ha	34	0	34	0	SHLAA_20 17	Developable: The site is in a sustainable location with no known policy/physical constraints, investigations would be required to establish the site's suitability for residential development. The site is thought to be in mixed ownership. There has been previous developer interest in the site, and the site is cleared housing/playing field which was allocated in the UDP for housing.	An application (P/2017/0674/FUL) for the erection of 66 dwellings was granted permission in February 2018. Therefore there is a reasonable prospect of development coming forward over the plan period. The trajectory and capacity are updated accordingly.	33	33	0	66
22	Land at corner of Fairclough Street and Wargrave Road	Earlestow n	Brownfield	0.41 ha	14	0	14	0	SHLAA_20 17	Developable The site is accessible and located in a sustainable location. There are no policy or known physical constraints that would make the site unsuitable for housing. There are ownership issues with the site which have pushed the trajectory back to 6-10 years. The site is cleared.	Site has expired planning approval from February 2011 for apartments. Due to concerns with viability the apartment scheme was moved back from the 2012 SHLAA trajectory. Site may require remediation. There is therefore considerable uncertainty about the delivery of the site.	0	14	0	14
23	Liverpool Arms and former Sacred Heart RC Church and School, Borough Road	Town Centre	Brownfield	0.83 ha	29	0	0	29	SHLAA_20 17	Developable: The site is in a sustainable location with no policy/physical constraints. The site is in mixed ownership and existing structures would need to be demolished prior to development. The site is considered to be financially viable to develop. The site is now partially clear, and there is an expired planning permission on site. The redevelopment of this site will be an important aspect of the redevelopment of this area of the town centre and therefore delivery within the next 5 years will be a corporate priority.	The site is largely clear and in a derelict state. A previous outline application (P/2004/1101) demonstrates some developer interest in the site. Overall it is therefore considered that there is a reasonable chance of development on the site.	0	0	29	29
25	Alexandra Park - Former Pilkington HQ	West Park	Brownfield	10.8 ha	162	0	162	0	SHLAA_20 17	Developable: The site is located in a sustainable location. Development would include the conversion of a Grade II listed building. There are no other policy/physical constraints, and no known legal/ownership issues. The site is considered to be financially viable. A Masterplan is being prepared for a mix of housing and employment uses.	The site is now partially vacant, but there has been no immediate developer interest to date in the form of planning application. In the absence of additional evidence about the short-term deliverability of the site, the delivery of the total capacity has been split over 6-10 and 11-15 years.	0	162	0	162
27	Former Bethell Mission Bowling Green, Marsden Avenue	West Park	Greenfield	0.27 ha	10	0	10	0	SHLAA_20 17	Developable: The site is not close to a train station, but is in a sustainable location. There are no known physical constraints development, and the site is allocated as a 'private recreation facility' in the UDP although is no longer in this use. There are no known legal or ownership issues. There has been previous developer interest and the site is likely to be financially viable to develop.	Site has an expired permission (P/2010/0638) and there is no clear evidence of developer interest in the site and the site and no progress on the site despite it being identified as deliverable within the next 5 years when assessed in the 2012 SHLAA. However there is a reasonable prospect that the site could be viably developed. The site is therefore considered developable.	0	10	0	10
31	Former Sutton Arms PH, Elephant Lane	Thatto Heath	Brownfield	0.35 ha	18	0	18	0	SHLAA_20 17	Developable The site is not close to a train station but is otherwise accessible and located in a sustainable location. There are no policy constraints yet there may be two mine shafts on the site which will require investigation. The necessary infrastructure is confirmed to be available within the locality and there are no legal/ownership issues.	The site requires investigation due to the potential presence of mine shafts, and viability may be affected by the ground conditions (including possible contamination). The site is a former public house which was demolished following a fire. The site had planning permission for demolition of the pub and erection of 18 dwellings which expired in October 2014 (P/2011/0651). It is considered reasonable that the site may come forward with the same trajectory identified in the SHLAA.	0	18	0	18

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery				Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Oustanding capacity	0-5 yrs	6-10 yrs	11-15 yrs				0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
36	Land & Premises at Lords Fold	Rainford	Brownfield	2.01 ha	45	45	0	0	SHLAA_20 17	Developable: Site is not close to a train station yet is otherwise accessible and sustainable. The site is a vacant former employment site and a planning application is in the process of being prepared. No known legal or ownership issues. Current buildings will be required to be demolished. There are unlikely to be financial viability issues.	The site has May 2018 outline planning permission (ref. P/2017/0789/OUP) for residential development. No subsequent applications have been submitted since and development is dependent on submission of reserved matters before May 2021. Delivery split between 0-5 and 6-10	23	22	0	45
38	Land north of Elton Head Road	Thatto Heath	Brownfield	12.5 ha	375	112	225	38	SHLAA_20 17	2017 SHLAA identifies site as deliverable. Existing businesses wish to relocate and this is anticipate to happen quickly. No longer economically viable employment site with current developer interest in site and a planning application for housing is in the process of being prepared. Lead-in time of 2.5 years allowed for planning permission and demolition.	Hybrid permission (P/2018/0060/FUL) was granted in June 2018, with outline permission for up to 352 dwellings. No discharge of conditions have yet been submitted. Given this, the level of demolition and remediation required on site, and the need to submit a reserved matters application, it is not considered realistic to expect dwellings to be delivered within the next 5 years. The trajectory is amended accordingly.	67	225	45	337
58	Former Central Works, Church Road	Haydock	Brownfield	1.35 ha	48	0	48	0	SHLAA_20 17	Developable: The site is not close to a train station but is otherwise accesible and located in a sustainable location for housing. There are no known legal or ownership issues and the site is considered to be available immediately. There has previously been developer interest in the site and it is likely to be financially viable.	The site is a cleared former industrial site which was subject to an expired planning permission two decades ago (P/2002/0589). Residential amenity may be an issue with the site bounded to the north by a superstore. Land may be contaminated and remediation may be required. A pre-application request was made for the propsoed development of 61 dwellings in 2018 (PRE/2018/0033/PREC) which demonstrates developer interest in the site. In the absence of any further information which would demonstrate developer commitment the site is retained.	0	48	0	48
59	Site of former 56-120 Eccleston Street	Town Centre	Brownfield	0.33 ha	13	0	13	0	SHLAA_20 17	Developable: The site is not close to a train station but is otherwise accessible and located in a sustainable location. There are no policy or known physical constraints that would make the site unsuitable for housing. There are no known policy or other physical constraints that would make the site unsuitable for housing.	The 2012 SHLAA noted that the site is a cleared former housing site with a prominent frontage along a busy route into the town centre. It was expected to be disposed of within 0-5 years yet there is no evidence of developer interest since then nor planning history on the site. The net developable area is constrained by the shape of the site and presence of mature trees. The land also has value as amenity greenspace in an otherwise built up area. Given these constraints, it is not considered there is a reasonable prospect that the site can be delivered.	0	0	0	0
60	Vacant land adjacent to Rail Line, Elephant Lane	Thatto Heath	PDL/GF	4.33 ha	112	0	112	0	SHLAA_20 17	Developable Site is located in a sustainable location close to a train station. There are no policy or known physical constraints that would make the site unsuitable for housing. Site is in local authority ownership and available. There are a number of potential issues such as noise, access, contamination, buried canal and covenants.	Site is former allotments and quarry which has become overgrown with mature trees. There are potential issues with contamination, noise from the adjacent railway line, and potential access. Potential requirement for remediation may impact upon site viability. As there is no evidence of developer interest in the site it is not considered likely that trajectory can be maintained and is instead put into the 11-15 year time period.	0	0	112	112
61	Land North and South of Corporation Street	Town Centre	Brownfield	3.23 ha	169	0	169	0	SHLAA_20 17	Developable: There are no known policy/physical constraints that would make the site unsuitable. Pipelines run in all corners of the site, potentially reducing the developable area. Loss of trees could require mitigation. Site is crossed by cycleway and footpath. Although viability is not a key concern, the viability and market interest in town centre apartment schemes is low.	The site is a narrow strip of land between a train line and a canal, and has numerous constraints that will further reduce the developable area. This reduces the viability for any scheme and there is currently no known developer interest. Given the technical and market challenges, is not considered there is a reasonable prospect that the site can be delivered.	0	0	0	0

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery				Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Outstanding capacity	0-5 yrs	6-10 yrs	11-15 yrs				0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
63	Land at Waterdale Crescent	Sutton	PDL/GF	0.26 ha	10	0	10	0	SHLAA_20 17	Developable: The site is accessible and in a sustainable location. Part of the site is allocated in the UDP as 'Publically Available Open Space' and part is used as informal amenity greenspace. There are no other policy/physical constraints and no known legal or ownership issues. The site is viable, but there is unlikely to be much developer interest.	Most of the site is allocated or used as amenity green space which represents a significant constraint to any development. Therefore it is not considered there is a reasonable prospect that the site can be delivered. There is no clear evidence of developer interest in the site, and the site was identified as deliverable within the next 5 years in the 2012 SHLAA.	0	0	0	0
64	BT Depot, Sutton Road	Town Centre	Brownfield	1.02 ha	36	0	0	36	SHLAA_20 17	Developable: The site is in a sustainable location, with no known policy/physical constraints or legal/ownership issues. There has been previous developer interest in the site and there are unlikely to be financial viability issues delivering the site. The site forms part of the Moss Nook Watery Lane development.	Former BT depot in active use as a donation centre for Willowbrook Hospice. This site forms part of the Moss Nook Watery Lane development (part of phase 3). Although there have been no applications for residential development, there has been known developer interest in the site. It is therefore considered that there is a reasonable chance of development on the site.	0	0	36	36
65	Former Pumping Station, Sutton Road	Town Centre	Brownfield	0.27 ha	10	0	10	0	SHLAA_20 17	Developable: The site is considered accessible with no known policy/physical constraints to development. There are no known legal or ownership issues. The existing buildings will need to be demolished, and there is a potential requirement for remediation. The site is considered to have an uncertain viability.	Site is part of the wider Moss Nook development area. Original permission (P/2003/1574) not acted on, no subsequent application so there is questionable developer interest in the site. The site is likely to have highly marginal viability due to need for remediation and demolition, and is therefore considered that any delivery on site would be towards the end of the plan period.	0	0	10	10
66	Land off Wargrave Road	Newton	PDL/GF	0.30 ha	7	0	7	0	SHLAA_20 17	Developable The site is not close to a train station or a secondary school but is otherwise in a sustainable location. The site is a cleared former housing site with protected trees present. There are no known policy or physical constraints that would prevent housing development. There has previously been developer interest in the site.	There is no clear evidence of developer interest in the site yet in the absence of any other evidence the site is retained with the indicative capacity from the SHLAA.	0	7	0	7
69	Site of former Parr Community High School, Fleet Lane	Parr	Brownfield	1.52 ha	54	0	54	0	SHLAA_20 17	Developable Site is not close to a train station but is otherwise accessible and located in a sustainable location for housing. Site identified in UDP as 'Education Recreation Field' but this is no longer in use as the school is being redeveloped. Site is likely to be financially viable and there are no legal or ownership issues.	Status of site has not changed from 2012 SHLAA. 2012 SHLAA identified site as expected to be disposed in the short term. There is no evidence to demonstrate the site could be developed within the 6-10 year period too yet despite concerns the anticipated trajectory of the site is accepted.	0	54	0	54
72	Site of former St.Marks Primary School, Willow Tree Avenue	Sutton	Brownfield	0.51 ha	18	0	18	0	SHLAA_20 17	Developable The site is not close to a train station but is otherwise accessible and located in a sustainable location. There are no policy or known physical constraints that would make the site unsuitable for residential development. The site is considered to be available. The site is a cleared former school site which has become overgrown.	The site is a cleared former school site which has become somewhat overgrown with mature trees. The 2017 SHLAA states that there is developer interest yet there is no evidence of this.	0	18	0	18
74	Site of former 119-133 Crow Lane West	Earlestown	Brownfield	0.30 ha	9	0	0	9	SHLAA_20 17	Developable: The site is in a sustainable location with a current active use. Although there are no policy/physical constraints to development, the site is in a mixed ownership and it is likely that the land will require decontamination prior to development. There has been previous developer interest in the site and it is considered likely to be financially viable to develop.	The site has an active use (builders merchant) and is thought to require decontamination prior to development, there is a reasonable prospect that the site will be available and could be viably developed. The site is therefore considered developable.	0	0	9	9

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery				Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Outstanding capacity	0-5 yrs	6-10 yrs	11-15 yrs				0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
75	Christ Church Parish Hall, Chapel Lane	Eccleston	Brownfield	0.36 ha	10	0	0	10	SHLAA_20 17	Developable: The site not proximate to a train station, but is in a sustainable location. There are some protected trees on the western boundary, and the site was in use as a medical centre. There are no known policy/physical constraints to development. The site is considered to be financial viable, although there will be demolition costs associated with clearing the site.	Outline application for 7 dwellings (P/2018/0739/OUP) was approved in January 2019. It is considered that there is a reasonable prospect for the site to come forward for 7 (rather than 10) in 0-5 years.	7	0	0	7
78	Former St.Helens Glass, Corporation Street	Town Centre	Brownfield	2.07 ha	149	0	149	0	SHLAA_20 17	Developable: The site is in a sustainable location with no policy/physical constraints and no known legal/ownership issues. Although site is considered viable, site may be considered 'high risk' and as such unattractive to developers.	The site is cleared, former industrial land within the Town Centre. An application (P/2017/0634/FUL) was approved in November 2017 for a 130 unit extra care facility on the northern part of the site. There is no known developer interest on the southern half of the site, therefore the capacity is reduced to 130.	0	130	0	130
82	Land adjacent Laffak Road and Carr Mill Road	Moss Bank	PDL/GF	3.31 ha	99	0	99	0	SHLAA_20 17	Developable: Site is occupied by motor auctioneers, agricultural holding and former pub/café. The site is subject to a Development Brief, including provision of a new rail station, a pylon crosses the site which may also require decontaminating prior to use. There are no policy/physical constraints, but the site is in active use and multiple ownerships. There has previously been developer interest in the site, although viability may be affected by contamination and land assembly costs.	An application (P/2019/0036/FUL) was submitted in January 2019 for 150 residential units. This application has not been approved to date, but does demonstrate developer interest of the site. There are therefore reasonable prospects of development on the site, and as such the site is retained with the indicative SHLAA capacity in 6-10 year deliverability.	0	99	0	99
84	Land adjacent Church of Christ, Heather Brae	Earlestown	Greenfield	0.30 ha	9	0	9	0	SHLAA_20 17	Developable: The site is considered accessible and in a sustainable location. There are no policy/physical constraints to development. The site is in mixed ownership which would need to be resolved prior to development. The site is used as informal open space.	The site is used as informal green space, with the 2012 SHLAA referring to the site as 'valuable green space' and considering it undeliverable. There are a number of mature trees on the western edge, and the site is in mixed ownership. Additionally there is no clear evidence of developer interest in the site. Development of the site is likely to contravene NPPF Paragraph 97 and its current use is likely to represent a significant constraint. It is not considered there is a reasonable prospect that the site can be delivered.	0	0	0	0
85	Site of former Our Lady's Primary School, Fleet Lane	Parr	Brownfield	0.61 ha	21	0	21	0	SHLAA_20 17	Developable The site is part of a cleared former school which has been redeveloped on an adjacent parcel. No known legal or ownership issues and site is considered to be available immediately. The site was identified in the UDP as an Education Recreation Field yet this is no longer needed and there are no other policy or known physical constraints that would make the site unsuitable for housing.	Site and neighbouring strip of land has planning permission for 54 dwellings (ref. P/2018/0502/FUL) from January 2019. Site is therefore considered reasonable to come forward in the short term.	54	0	0	54
87	Land west of Vista Road	Haydock	Greenfield	1.24 ha	33	0	0	33	SHLAA_20 17	Developable: The site is located 250m from a large landfill site, there is a pipeline running along the boundary and a scrapyards to the south. There are no other known policy/physical constraints, or legal/ownership issues. There has been previous developer interest in the site, although adjacent land uses might impact upon viability.	The 2017 SHLAA states that the scrapyards, cement works and landfill 'may reduce the prospect of development in the near future'. In the absence of any information that this will change, the site is removed from the trajectory at this time.	0	0	0	0

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery				Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Oustanding capacity	0-5 yrs	6-10 yrs	11-15 yrs				0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
89	Land rear of 64-94 Marshalls Cross Road	Town Centre	Greenfield	0.96 ha	12	0	12	0	SHLAA_20 17	Developable: The site is covered by unprotected mature trees and half of the site is within Flood Zone 3. There are no further known policy/physical constraints, and there are no known legal issues to delivery of the site. There has been previous developer interest in the site. The physical constraints of the site could impact its viability.	A pre-application enquiry was submitted for the site in 2019 for a total of 35 dwellings. However no formal application has yet been made, so in the absence of any further evidence the site is retained with the indicative capacity from the SHLAA.	0	12	0	12
90	Land to the West of Common Road	Earlestown	Greenfield	5.44 ha	142	142	0	0	SHLAA_20 17	Deliverable: The site is currently used as agricultural/grazing land and some of the site is located within the green belt, a pipeline runs along the western boundary and the site is within 250m of a landfill site. There are no other policy/physical constraints, and no known legal or ownership issues. There is active developer interest in the site, and the area outside of the Green Belt was allocated for housing in the 1998 UDP.	An application (P/2016/0742/FUL) was approved in May 2017 for 142 dwellings. No DoC applications have been submitted to date, so trajectory has been pushed back a year.	112	30	0	142
91	Milton Street	Bold	Greenfield	1.27 ha	25	0	25	0	SHLAA_20 17	Developable: The site is not close to a train station but is otherwise accessible and located in a sustainable location. A flood risk assessment, sequential test and exceptions test will be required as a quarter of this site is in flood zone 3, to establish whether the site can be developed for housing. The site comprises allotments and is in mixed ownerships which will need resolving.	Site comprises allotments and is a former school playing field. Part of the site is within Flood Zone 3 and allotments on part of site/to south. The site is also in multiple ownership. Due to this combination of factors there is considerable uncertainty as to whether the site can be developed for housing, and it should not be relied on in the supply.	0	0	0	0
95	Site of former Carr Mill Infants School, Ullswater Ave	Moss Bank	PDL/GF	1.49 ha	53	0	53	0	SHLAA_20 17	Developable Site is not close to a train station but is otherwise accessible and located in a sustainable location for housing. Site identified in UDP as 'Education Recreation Field' but this is no longer in use as school has been demolished. No known physical, legal and ownership issues. There has previously been developer interest in the site and it is likely to be financially viable.	Site overgrown cleared former school site surrounded by residential uses. Site was kept in 0-5 year period in 2012 SHLAA as enquiries were received to develop a residential scheme in the short term.	0	53	0	53
96	Land rear of 350 Warrington Road	Rainhill	Greenfield	0.39 ha	11	0	0	11	SHLAA_20 17	Developable: The site is currently used for grazing and as private residential gardens. There are no known policy/physical constraints. The site is believed to be in mixed ownership, and the site is thought to have uncertain viability due to access issues and the need for demolition.	The site is landlocked with no obvious means of access, and considered to have uncertain viability. The site was considered to be undeliverable in the 2012 SHLAA, and there is no clear evidence that the site will come forward for development.	0	0	0	0
102	Auto Safety Centre, Vicarage Road	Blackbrook	Brownfield	0.31 ha	9	0	9	0	SHLAA_20 17	Developable: The site is a building in an active use that would require cessation prior to development. There are no known policy/constraints that would prevent housing development. There has previously been developer interest in this site and it is likely to be financially viable to develop.	The site remains in an active use and was converted (circa. 2012) to car repair garage. Although development would require cessation of use, there is a reasonable prospect that the site will be available and could be viably developed. The site is therefore considered developable.	0	9	0	9
103	Land rear of 39-67 Valentine Road	Earlestown	PDL/GF	0.46 ha	10	0	10	0	SHLAA_20 17	Developable: The site is considered to be accessible and in a sustainable location. Site comprises former garages and is an awkward shape. There are no known physical constraints, part of the site is identified in the UDP as 'Publicly Available Open Space'. The site is in mixed ownership. There are unlikely to be financial issues in bringing the site forward for development. Considered undeliverable in 2012 SHLAA.	Development of the site will involve the loss of Open Space and the site is an awkward shape that is likely to further reduce the developable area and density of any potential development. There is no clear evidence that the site will come forward for development and it should be removed from the supply.	0	0	0	0

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery			Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Oustanding capacity	0-5 yrs	6-10 yrs				11-15 yrs	0 - 5 yrs	6-10 yrs	11-15 yrs
106	Site of former 126-154 Birchley Street and 107- 125 Brynn Street	Town Centre	Brownfield	0.25 ha	10	0	10	0	SHLAA_20 17 Developable: The site is accessible and in a sustainable location. There are no known physical/policy constraints to development. Site is currently used as a car park, although Council is reviewing car parking in town centre and site could be released as part of One Public Estate Programme. Site is likely to be financially viable to develop.	The site is considered to be developable. There is currently no known developer interest, however the site is likely to be financially viable.	0	10	0	10
109	Land adjacent Piele Road	Haydock	PDL/GF	0.61 ha	13	0	13	0	SHLAA_20 17 Developable The site is not well served by public transport but is otherwise accessible and located in a sustainable location. There are no policy constraints that would make the site unsuitable for housing. However, some land remediation may be required due to the former use as a railway line. Part of the site is currently used as informal open space, while part is a railway line and the remainder vacant greenfield land. The site is likely to be financially viable.	The site is 75% previously developed land and 25% greenfield land that in 2012 was in use as informal open space. The 2012 SHLAA noted that there was no developer interest on the site in the short term, and moved the site to the 6-10 year period. There is no evidence that the site can still be relied on to come forward in 6-10 years. It is not considered there is a reasonable prospect that the site can be delivered.	0	0	0	0
111	Land east of City Road, Cowley Hill	Moss Bank	Brownfield	47.09ha	405	0	180	225	SHLAA_20 17 Developable: Partly vacant employment site with a masterplan for a mix of housing and employment uses being prepared. There are no policy or known physical constraints that would make the site unsuitable for housing. 7 year lead in time to allow for significant site preparation works, planning permission and demolition. 405 units estimated to be delivered in years 7-15 and 408 units estimated to be delivered beyond the 15 year SHLAA period.	The site has become surplus to requirements for former occupier Pilkingtons. There will be a requirement for demolition and remediation on the site and in this context the Council's anticipated lead in time is noted. No amendments to trajectory are proposed.	0	180	225	405
112	Land to the rear of Juddfield Street	Blackbrook k	Brownfield	1.14 ha	41	0	0	41	SHLAA_20 17 Developable: The site is currently in use as a scrapyard, and will need remediating prior to development. There are no policy/physical constraints, but the site is believed to be in mixed ownership which would need to be resolved. There has been previous developer interest in the site.	Although there has been previous developer interest in the site, it would require the cessation of the current use and remediation of the site which may reduce overall viability. The site also faces ownership constraints. Overall, it is considered the site faces several constraints and should not be relied upon in the supply.	0	0	0	0
113	Land at Willow Tree Avenue	Sutton	Greenfield	3.5 ha	50	0	0	50	SHLAA_20 17 Developable The site is not close to a train station but is otherwise accessible and located in a sustainable location. The developable area is reduced by two pylons running across the site. There are no policy or other known physical constraints that would make the site unsuitable for housing. Given the availability of sites in the Borough developers may choose to develop higher value and lower risk sites before moving forward with more difficult sites in the future.	The site is severely constrained by 2 overhead HV lines and pylons. Southern portion of site is heavily wooded. Furthermore, the site is in mixed ownership and there is no evidence of developer interest in the site. Site should be taken out. Site removed from trajectory.	0	0	0	0
114	Land at 19 and 25 Sutton Moss Road	Parr	PDL/GF	0.54 ha	14	0	0	14	SHLAA_20 17 Developable The site is well served by public transport and there is a PROW along the western boundary of the site. There are no other policy or physical constraints. The site is within mixed ownership	The site is in multiple ownership which given the modest size of the site, may constrain delivery in the short or medium term. It is a backland site with 2 dwellings, gardens and agricultural small-holding with access issues The site comprises 2 dwellings and is therefore in an active use which would require cessation prior to development. It is considered that due to these factors it is not reasonable to expect the site to come forward until the long term.	0	0	0	0

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery				Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Oustanding capacity	0-5 yrs	6-10 yrs	11-15 yrs				0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
126	Former Halton and St Helens PCT HQ, Cowley Hill	Windle	Brownfield	0.89 ha	32	32	0	0	SHLAA_20 17	Deliverable: The site is considered to be accessible, with no known policy/physical constraints to development. The site would need to be cleared prior to development. There has been previous developer interest in the site, and pre-application discussions are ongoing.	Developer interest is evident through recent pre-application interest on the site, and through applications for demolition of the existing buildings. Therefore there is a reasonable prospect that the site will be available and could be viably developed. The site is therefore considered developable.	32	0	0	32
129	Derbyshire Hill Family Centre, Derbyshire Hill Road	Parr	PDL/GF	0.32 ha	12	0	0	12	SHLAA_20 17	Developable: There are no known policy/physical constraints that would make the site unsuitable for development. The site is in use as a community centre, which would need to cease and the site be cleared prior to development taking place.	The site is currently in use as a community centre. The 2012 SHLAA identified the site as deliverable in 11-15 years, in the absence of further evidence to suggest the centre is surplus to requirements it is unreasonable to assume the site will come forward for development.	0	0	0	0
133	Land rear of 2-24 Massey Street	Town Centre	PDL/GF	0.35 ha	14	0	0	14	SHLAA_20 17	Developable The site is not close to a train station but is otherwise accessible and located in a sustainable location. There are no policy or known physical constraints that would make the site unsuitable for residential development. The site is considered to be available. However the surrounding land uses may present some issues which reduce the potential viability and on this basis the site is considered to be not currently achievable.	The site is currently greenspace which is currently used for informal recreation and was previously former garages and allotments. The 2012 SHLAA notes that the site is located within the Hays Chemical Consultation zone. The site may have issues with amenity as a factory, warehouse and other industrial uses lies to the immediate north and St Helens Hospital is to the immediate west. Furthermore there is no evidence of developer interest. The SHLAA trajectory is therefore not considered reasonable and the site should not be relied upon in the supply.	0	0	0	0
134	Land at Littler Road	Blackbrook	Greenfield	0.52 ha	11	0	11	0	SHLAA_20 17	Developable: The site is considered to be in a sustainable location. Major pipelines run along the southern boundary of the site, but the northern area could be developed. There are no further policy/physical constraints to development. There are no known legal/ownership issues. The site is also used currently as informal open space.	The site is overgrown and used as informal open space with 5 pipelines along southern boundary. The Health & Safety Executive and National Grid objected to a previous residential enquiry on the site on the grounds of safety, and the site was previously excluded from the 2012 SHLAA on this basis. The site is therefore considered to be undevelopable.	0	0	0	0
135	Land at Newby Place	Moss Bank	Greenfield	0.34 ha	13	0	13	0	SHLAA_20 17	Developable: The site is not close to a train station but is otherwise accessible and located in a sustainable location. There are no policy or known physical constraints that would make the site unsuitable for housing. There are no known legal or ownership issues and the site is considered to be available immediately. The site is used as informal open space.	It was noted in the 2012 SHLAA that the site was in use as informal open space as a square to properties on Newby Place and was considered not deliverable. Development of the site is likely to conflict with NPPF Paragraph 97. The site surrounded by existing bungalows which is likely to severely limited developable area. There is no evidence of developer interest and overall, it is not considered there is a reasonable prospect that the site can be delivered.	0	0	0	0
150	Former Red Quarry, Chester Lane	Bold	Brownfield	1.93	57	0	57	0	SHLAA_20 17	Developable: The site is a former refuse tip and recent ground investigation indicates that the site is developable. The site is in a sustainable location close to a train station and high frequency bus service. The site is heavily wooded and a brook runs from the south of the site required ecological mitigation and easement. Viability could be impacted by potential ground contamination remediation measures. No known legal or ownership issues.	The site was deemed to be undeliverable in the 2012 SHLAA yet a recent ground investigation indicated that the site is developable. The site is covered by mature trees and Pendlebury Brook runs along the southern border of the site meaning topography is steep and a constraint. The combination of these constraining factors with the lack of developer interest means that the site should be taken out of the supply.	0	0	0	0

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery			Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Oustanding capacity	0-5 yrs	6-10 yrs				11-15 yrs	0 - 5 yrs	6-10 yrs	11-15 yrs
151	Land adjacent St.Helens Hospital, Marshalls Cross Road	Town Centre	Brownfield	1.65 ha	59	0	0	59	SHLAA_20 17 Developable: The site is not close to a train station but is otherwise accessible and located in a sustainable location for housing. A flood risk assessment is required and ground investigations may be required to check the extent of land that is suitable for development. There has previously been developer interest in the site 4 years ago yet there was no meaningful progress on bringing the site forward.	Northern boundary of the site is located in Flood Zone 2 which limits the developable area and requires further investigation to establish suitability for residential development. The 2017 SHLAA noted that the site may require ground investigations which may again limit the extent of land that is suitable for development. There is uncertainty around flood risk and ground conditions and a lack of developer interest. The site should be taken out of the supply.	0	0	0	0
152	Sidac Sports & Social Club, Applecorn Close	Sutton	PDL/GF	3.65 ha	137	112	25	0	SHLAA_20 17 Deliverable: The site is in a sustainable location, but is recognised as a private recreational sports facility. Any loss of this would have to be compensated to ensure its suitability for residential development. There are no other policy/physical constraints, and no known legal or ownership issues. There is current developer interest in the site and its development is likely to be financially viable.	An application (P/2017/0890/FUL) approved in September 2018 for 117 dwellings and relocation of the existing Sports Facilities. No DoC applications have been submitted to date, so delivery of total capacity has been split over 0-5 and 6-10 years.	112	25	0	137
154	College Street Northern Gateway	Town Centre	Brownfield	2.88 ha	103	0	103	0	SHLAA_20 17 0	Site is home to numerous active uses including a job centre, register office and car park which would require cessation and demolition prior to development which may reduce overall viability. However it is considered that there is a reasonable prospect of the site being delivered in the 11-15 year time period.	0	0	103	103
155	Land south of Knowsley Road	West Park	Brownfield	0.42 ha	18	0	18	0	SHLAA_20 17 Developable The site is not close to a train station but is otherwise accessible and located in a sustainable location. It is part of the wider Peugeot site and this particular part of the site has planing permission for a nursing home. If higher density housing is provided then it is considered that development could be financially viable.	The site has planning permission for 50 homes and apartments as part of the wider Peugeot site (ref. P/2017/0836/FUL) approved in April 2018. There are no subsequent DoC applications.	0	18	0	18
156	Land south of Crab Street	Town Centre	Brownfield	1.26 ha	21	0	0	21	SHLAA_20 17 Developable The site is not close to a train station but is otherwise accessible and located in a sustainable location and suitable for housing. The necessary infrastructure is available and the site has planning permission for residential development and a medical centre. The medical centre has been built out but no progress has been made on implementing the residential aspect of the development (54 apartments), this is likely due to S.106 and viability issues with the apartments.	The site has planning permission from 2018 (P/2018/0021/FUL) for the erection of an over 55s facility incorporating 61 apartments approved in April 2018. There have been no subsequent DoC applications and work has not yet started on site.	0	0	21	21
HL076	Land at Lea Green Colliery and Lowfield Lane Industrial Estate (Morris Homes)	Thatto Heath	Brownfield	10.78 ha	8	8	0	0	Planning permission: under construction 2017 identifies that the site is under construction.	Planning permission for 364 units (P/2006/1407) confirmed . Reasonable to assume remaining units will be delivered comprising the completion of Lea Green Urban Village.	8	0	0	8
HL174	Haydock Cricket And Bowling Club Ireland Road St Helens Haydock	Haydock	Brownfield	0.68 ha	17	0	0	17	Planning permission: historically stalled site SHLAA identifies the site as 'historically stalled'	Planning permission (P/2009/0704) granted 2009 and a number of discharge of condition applications have followed. Construction had not began as of the 2012 SHLAA and site was kept in the 0-5 year period. Due to recent condition applications it is considered reasonable to keep the trajectory from the SHLAA.	0	0	17	17

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery			Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery				
					Outstanding capacity	0-5 yrs	6-10 yrs				11-15 yrs	0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
HL186	Former Pilkingtons Site, City Road	Moss Bank	PDL/GF	4.4 ha	10	10	0	0	Planning permission: under construction	2017 SHLAA identified the site as under construction.	Application approved in 2013 (P/2013/0593/FUL), majority of the site built out. Therefore reasonable to assume that outstanding 10 dwellings will come forward in 0-5 year period.	10	0	0	10
HL189	Land Off Monastery Lane	Sutton	Brownfield	2.82 ha	80	0	0	80	Planning permission: historically stalled site	2017 SHLAA identifies the site has a 'historically stalled' site with planning permission.	Site has expired outline permission from 2010 (P/2009/1072), extended in 2013 (P/2013/0185). The 2017 SHLAA states that the developer indicated that there are 'substantial unanticipated remediation costs' which resulted in the development becoming unviable. There is no evidence that there is a reasonable prospect that the site can be delivered therefore it should be removed from the supply.	0	0	0	0
HL202	Deacon Trading Estate	Earlestown	Brownfield	9.07 ha	265	225	40	0	Planning permission: under construction	2017 SHLAA identifies the site as under construction.	No changes are proposed to the trajectory.	225	40	0	265
HL250	Pilkington (Eccleston Works), Millfields	Eccleston	Brownfield	9.5 ha	85	85	0	0	Planning permission: under construction	2017 SHLAA identifies the site as under construction.	Development under construction in 2019. Reasonable prospect of meeting trajectory.	85	0	0	85
HL289	388 Clipsley Lane	Haydock	Greenfield	0.55	5	5	0	0	Planning permission: not started	2107 SHLAA identified the site as having permission which has not yet started.	Planning permission P/2016/0335/FUL approved in 2016, expires 23/06/2019, no DoC application submitted yet. Site is in process of being built out and therefore it is reasonable to assume site will be built out in 10 year period.	5	0	0	5
HL303	Phase 2a & 2b Land Site Of Former Vulcan Works Wargrave Road	Newton	Brownfield	5.2 ha	31	31	0	0	Planning permission: under construction	2017 SHLAA identifies the site as under construction.	Site is being built out by Jones Homes	31	0	0	31
HL310	Phase 3 (Aka 2b) Land Site Of Former Vulcan Works Wargrave Road	Newton	Brownfield	2.54 ha	74	74	0	0	Planning permission: not started	2017 SHLAA identifies the site has having planning permission (P/2012/0371) which has not been started.	It is assumed this permission is still extant.	74	0	0	74
HL343	The Black Horse, Moss Bank Road	Moss Bank	PDL/GF	0.42 ha	16	16	0	0	Planning permission: not started	2017 SHLAA identified the site as having planning permission which has not been started.	Site has planning permission from P/2016/0651 for 16 dwellings and subsequent discharge of conditions in April and November 2017. Construction on site has not yet began yet it is reasonable to expect that the site will be built out in the short term.	16	0	0	16

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery			Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery				
					Oustanding capacity	0-5 yrs	6-10 yrs				11-15 yrs	0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
HL363	Land At Baxters Lane	Sutton	Brownfield	1.97 ha	84	0	0	84	Planning permission: historically stalled site	2017 SHLAA identifies the site has a 'historically stalled' site with planning permission.	Planning permission (P/2013/0671) granted in 2013 (which expired in 2016) for 84 dwellings. Site stalled in 2014 due to remediation issues, therefore put into 11-15 year supply. Unclear what evidence there is that site would be delivered by then given lack of activity. Site should be removed from the supply.	0	0	84	84
HL386	Former Caledonia Peugeot Garage, Knowsley Road	West Park	Brownfield	0.46 ha	37	0	0	37	Planning permission: historically stalled site	2017 identifies the site as 'historically stalled'	The last completion was 2009/10 therefore should not be relied on in supply	0	0	0	0
HL417	Sherdley Remec Ltd Gorse Lane Clock Face	Bold	Brownfield	0.93 ha	14	14	0	0	Planning permission: under construction	2017 SHLAA identified the site as under construction.	Site has RM planning permission (ref. P/2015/0582) approved July 2015. There have been subsequent DoC applications. Site is in process of being built out and therefore it is reasonable to assume remaining 14 homes will come forward.	14	0	0	14
HL430	Land at Delta Road	Parr	PDL/GF	1.34 ha	38	52	0	0	Planning permission: under construction	2017 SHLAA identified the site as under construction.	Site appears to be part complete in 2018, reasonable to assume that development will be delivered in indicated trajectory.	52	0	0	52
HL443	Land Off Lowfield Lane	Thatto Heath	PDL/GF	3.6 ha	114	114	0	0	Planning permission: not started	2017 SHLAA identifies site as having planning permission which has not yet started.	The site has planning permission (P/2012/0405) which was granted on September 2015, a DoC approved in December 2018 and a DoC application are currently being determined. Assuming planning permission is still extant, it is reasonable to expect the site to come forward in the 5 year period.	114	0	0	114
HL445	Rainford Ex Servicemens Club 36 Cross Pit Lane Rainford St Helens	Rainford	Brownfield	0.46 ha	4	4	0	0	Planning permission: under construction	2017 SHLAA identified the site as under construction.	Outline planning permission P/2015/0369 approved 2015, reserved matters approved P/2015/0929/RES. Subsequent discharge of conditions C/2016/0048/CON and C/2017/0047/CON. Site is in process of being built out and therefore it is reasonable to assume remaining 4 homes will come forward.	4	0	0	4
HL449	107 St Helens Road Eccleston Park	Eccleston	Brownfield	0.77 ha	8	8	0	0	Planning permission: not started	2017 SHLAA identified the site as having permission which has not yet started.	Outline planning permission (P/2015/0517) for 8 dwellings approved in 2015 and reserved matters approved in 2017. Numerous DoC applications submitted in Sept 2018, Oct 2018 and Dec 2018. Site is therefore considered deliverable due to reasonable prospect it will be built out.	8	0	0	8
HL456	Land At Sorrel Way Clock Face	Bold	Brownfield	0.36 ha	10	10	0	0	Planning permission: not started	2017 SHLAA identified site as having permission which has not yet started.	Application approved in 2015 (P/2015/0484), which expired in 2018. New application for 12 dwellings (P/2018/0908/FUL) submitted in December 2018, awaiting decision. There is therefore a reasonable prospect that development will come forward.	12	0	0	12

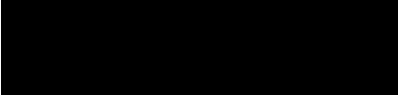
Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery				Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Oustanding capacity	0-5 yrs	6-10 yrs	11-15 yrs				0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
HL471	Penlake Industrial Estate Land At Emr Recycling And Former British Rail Club, Railway Embankment And	Bold	Brownfield	10.19 ha	358	135	223	0	Planning permission: not started	2017 SHLAA identifies the site has having planning permission which has not been started.	A hybrid application (P/2015/0130) was approved for re-profiling of the former railway embankment and up to 358 dwellings and mixed use development on the site in December 2015. In September 2018, reserved matters was approved for 337 dwellings (P/2018/0251/RES) and conditions are currently being discharged. The supply figure should be reduced by 21 dwellings to 337.	135	202	0	337
HL483	Ibstocks, Chester Lane	Bold	Brownfield	9 ha	260	50	210	0	Planning permission: not started	2017 SHLAA identifies the site has having planning permission which has not been started.	A Hybrid planning application (P/2015/0599/HYBR) was granted in May 2016. Full permission was granted for the importation of fill and profiling of the site and outline for residential development. Whilst we understand work on the site is progressing, there is a requirement for substantial land remediation works over several years to take place before dwellings can be developed on site. It is therefore optimistic to expect first dwellings to be delivered as soon as 2019/20, and the trajectory should be amended to reflect this.	10	100	150	260
HL488	Saxon Court Keswick Road	Windle	PDL	0.42	6	6			Planning permission: under construction	2017 SHLAA identified the site as under construction.	Planning permission P/2016/0109 approved 2016 and subsequent discharge of condition applications followed. Site is under construction so it is reasonable to expect the freaminging 6 homes to come forward in the short term.	6	0	0	6
HL496	Land at Elton Head Road, Lea Green	Thatto Heath	Greenfield	6.2 ha	180	135	45	0	Planning permission: not started	2017 SHLAA identifies the site as having planning permission (P/2015/0309) which has not been started.	Permission for 180 dwellings was granted in April 2016. A Reserved Matters application must therefore be submitted before the end of April before the permission expires. It is considered reasonable to assume the site will deliver 180 dwellings over the 15 year period. However, unlikely as many as 135 dwellings will be delivered in the first 5 years given the need to apply for reserved matters and discharge conditions. Even applying SHMBC's estimates for lead-in times and delivery rates, it is considered the trajectory for the 0-5 year period should be reduced by 45 dwellings.	90	90	0	180
HL524	Clough Mill Blundells Lane	Rainhill	Brownfield	0.51	10	10	0	0	Planning permission: not started	2017 SHLAA identified site as having permission which has not yet started.	Outline permission P/2016/0193/OUP expires December 2019, no Reserved Matters application has been submitted to date. It is reasonable to assume that there may be interest in the site, and it is considered reasonable to assume that (pursuant to a new application or RM application) the site will come forward.	0	10	0	10
HL525	Fishwicks Industrial Estate, Baxters Lane	Town Centre	Brownfield	2.75 ha	93	90	3	0	Planning permission: not started	2017 SHLAA identifies the site has having planning permission which has not been started.	Industrial estate still in active use in 2018. An outline application (P/2016/0299/OUP) was approved in November 2016 for 93 dwellings. No RM application has been submitted to date. It is therefore fair to say there is some developer interest in the site, however in the absence of a further application the of total capacity has been split over 0-5 and 6-10 years.	47	46	0	93

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery				Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Oustanding capacity	0-5 yrs	6-10 yrs	11-15 yrs				0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
HL526	Former Broad Oak Social Club and land rear of 1-21 Seath Avenue	Parr	PDL/GF	0.97 ha	21	21	0	0	Planning permission: not started	2017 SHLAA identified the site as having planning permission which has not been started.	Site is former social club with cleared garages and former open space in multiple ownerships. Site has planning permission (ref. P/2016/0417/OUP) and full approval granted August 2018 for the demolition of existing buildings and erection of 24 no. dwellings granted August 2018 (P/2018/0287/FUL). A DoC application was submitted on August 2018. It is therefore considered reasonable that the site will come forward in the short-term.	21	0	0	21
HL527	Land At 305 Walkers Lane Sutton Manor	Bold	PDL/GF	0.5	16	16	0	0	Planning permission: not started	2017 SHLAA identified the site as having planning permission which has not been started.	RM approved January 2018. DoC submitted April 2018. Work on site has not yet started yet it is reasonable to expect that the site will be built out in the short term.	16	0	0	16
HL531	Land At Mere Grange Lowfield Lane	Thatto Heath	Greenfield	3.6 ha	98	90	8	0	Planning permission: not started	2017 SHLAA identifies the site has having planning permission which has not been started.	An outline approval (P/2016/0567/HYBR) in November 2016 allowed for 120 dwellings. A full application for 82 dwellings (P/2018/0849/FUL) submitted in November 2018, awaiting decision. Development capacity altered accordingly.	82	0	0	82
HL532	Land At Rear Of 46 Windle Hall Drive	Windle	Greenfield	0.43	9	9			Planning permission: under construction	2017 SHLAA identifies the site as under construction.	Planning permission P/2016/0568/FUL approved 2016, discharge of conditions application submitted 2016.	9	0	0	9
HL537	Windlehurst Youth Centre Gamble Avenue	Windle	PDL	0.47	12	12	0	0	Planning permission: not started	2017 SHLAA identifies the site as having permission which has not yet started.	Application for 12 dwellings (P/2016/0650/FUL) approved in November 2016, although no DoC application has been submitted to date it is reasonable to assume the development will come forward in 0-5 years.	12	0	0	12
HL555	Viridor Glass Recycling, Lancots Lane	Town Centre	Brownfield	1.76 ha	53	53	0	0	Planning permission: not started	2017 SHLAA identifies the site as having planning permission (P/2016/0210/FUL) which has not been started.	Site has planning permission (ref. P/2016/0210/FUL) which was granted March 2017 and a subsequent DoC application submitted was submitted in June 2017. Work on site has not started yet it is assumed this permission is still extant.	53	0	0	53
HL557	Land north of Edward Street	Town Centre	Brownfield	1.21 ha	52	52	0	0	Planning permission: not started	2017 SHLAA identifies the site as having planning permission (P/2017/0083/FUL) which has not been started.	The site is a cleared former industrial site adjacent to residential development. 52 dwellings have permission as of March 2017 (P/2017/0083/FUL) and numerous DoC applications submitted in 2017. No further discharge of conditions and work has not started. Accordingly considered it should be moved to 6-10 period.	52	0	0	52
NT03	Land to side and rear of 41-49 Old Wargrave Road	Newton	Brownfield	0.61 ha	60	60	0	0	Planning permission: not started	2017 SHLAA identifies the site as having planning permission (P/2016/0412) which has not yet been started.	The site has planning approval (ref. P/2016/0412) from May 2016 alongside one discharge of condition application in 2018 which did not succeed in discharging the condition. As of 2017 work on site had not yet started. Assuming the permission is still extant, no evidence is supplied to demonstrate reasonable prospect of delivering within 5 years therefore supply is moved to 6-10 years.	20	40	0	60

Ref	Site Name	Ward	Land Type	Size	2017 SHLAA Anticipated Delivery				Type of site	2017 SHLAA Comments	Nexus Comments	Nexus Anticipated Delivery			
					Outstanding capacity	0-5 yrs	6-10 yrs	11-15 yrs				0 - 5 yrs	6-10 yrs	11-15 yrs	Nexus Total
NT06	Phase 4 Land Site Of Former Vulcan Works Wargrave Road	Newton	Brownfield	3.76 ha	134	0	134	0	Planning permission: not started	2017 SHLAA identifies the site as having planning permission which has not yet started.	The site has planning permission (ref. P/2016/0604) and numerous DoCs have been approved, the latest in June 2018. Assuming planning permission is extant there is a reasonable prospect of the site being delivered in the 10-15 year time period.	0	134	0	134
RH11	Land off Stonecross Drive	Rainhill	Brownfield	0.81 ha	7	0	0	7	Planning permission: historically stalled site	2017 identifies the site as 'historically stalled'	The original permission for the site was granted in 1998. 44 of the 51 dwellings have been completed but the site is not finished. Given the time passed, it is not reasonable to anticipate construction will resume.	0	0	0	0
TC43	HQ Apartments (former AC Complex Site), Shaw Street	Town Centre	Brownfield	0.4 ha	64	0	0	64	Planning permission: historically stalled site	2017 SHLAA comments that site was part of planning approval P/2006/1076 for three apartment blocks. Two blocks were developed, one outstanding due to viability issues. 2017 SHLAA includes the 64 units in the 11-15 year supply.	The status of the site has not changed since the 2012 SHLAA. There is no evidence to demonstrate development of third block is now viable therefore no evidence to conclude there is a reasonable prospect the site could be viably developed at the point envisaged. It should be removed from the supply.	0	0	0	0
TH02	Land at Lea Green Colliery and Lowfield Lane Industrial Estate (Persimmon Homes)	Thatto Heath	Brownfield	5.25 ha	103	103	0	0	Planning permission: under construction	2017 SHLAA identified site as under construction.	Site has permission from 2014 (P/2014/0291) for 152 dwellings. Site is under construction as of 2017 with 49 out of 152 capacity completed. There is a reasonable prospect of meeting trajectory.	103	0	0	103
WI01	Polar Ford, City Road	Windle	Brownfield	2.75 ha	81	81	0	0	Planning permission: under construction	2017 SHLAA identifies the site as under construction.	Planning permission (P/2010/0276) granted for the erection 87 dwellings. Development under construction in 2018, reasonable prospect of meeting trajectory.	81	0	0	81
WI14	Land Adjacent To Bleak Hill Farmhouse Bleak Hill Road Windle	Windle	Greenfield	0.25 ha	7	7	0	0	Planning permission: not started	2017 SHLAA identified the site as having permission which has not yet started.	Planning permission (P/2015/0026) for 7 dwellings approved on March 2015. DoC submitted in June 2016 (C/2016/0038/CON) and NMA September 2018 (A/2018/0039/NMA). Work on site had not yet started according to 2017 SHLAA. Site was kept in 5 year delivery in 2012 SHLAA despite lack of progress on site. However there is a reasonable prospect that the site could be developed. The site is therefore considered developable.	7	0	0	7
					6287	2041	2968	1292				1917	1955	1242	5114

**Nexus Planning
Manchester**

Eastgate
2 Castle Street
Castlefield
Manchester
M3 4LZ



RO1958

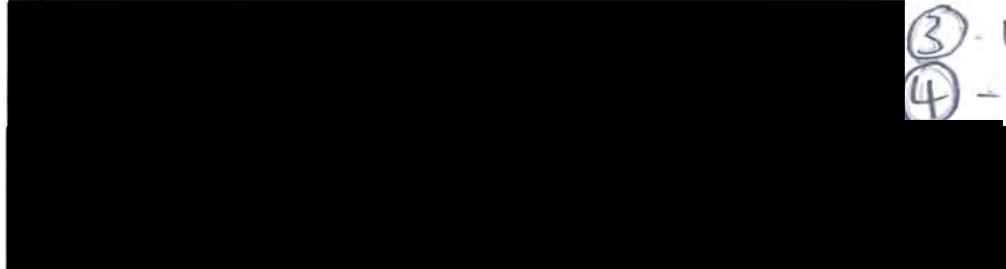


Representations to Submission Draft St Helens Local Plan on behalf of Muller Property

Group
Helen Binns

to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:14

- ① - LPA05
- ② - GREEN BELT REVIEW
- ③ - LPA05.1
- ④ - LPA06
- ⑤ LPA05 TABLE 4.5



5 Attachments



Site Location Plan.pdf



Representations form - Part A and B.pdf



13-03-2019 Site Assessment Document.pdf



13-03-2019 St Helens Council - Representations to Submission Draft St Helens Local Plan.pdf



CLO1902_Clockface Comparative Study_Final Report_LR.pdf

Dear Sir / Madam

Please find attached representation to the Submission Draft St Helens Local Plan on behalf of our client Muller Properties Group.

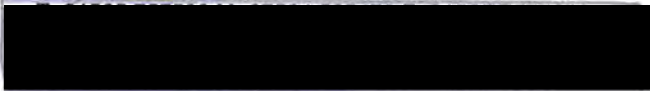
Our submission comprises the following:

- Covering letter;
- Representations form – parts A and B combined;
- Site location plan;
- Site Assessment Document; and
- Comparative Sites Study

I would be grateful of confirmation of receipt of this emails.

Kind regards
Helen

Helen Binns
Principal Consultant
Walsingham Planning
Brandon House, King Street, Knutsford, WA16 6DX



If you are not the intended recipient of this email, please notify the sender. The contents of any email may contain a virus which could damage your computer. Whilst reasonable precautions have been taken to minimise this risk, we cannot accept liability for any damage which you suffer as a result of a virus. You should carry out your own virus checks before opening any attachments. If you wish to see our privacy policy or know about how we hold data please follow this link to our website <http://walsinghamplanning.co.uk/resources/privacy-policy.html>



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**


This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Mark
Last Name:	Last Name: Krassowski
Organisation/company: Muller Property Group	Organisation/company: Walsingham Planning
Address: C/O Agent	Address: Brandon House, King Street Knustford
Postcode:	Postcode: WA16 6DX



Signature: 	Date: <input type="text" value="13/03/2019"/>
----------------------------------------------------------------------------------------------------------	------------------------------------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA 05 and Table 4.5	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)				Meeting St Helens Borough Housing Needs.						

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

See attached covering letter from Mark Krassowski Walsingham Planning and Supporting documents.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/> Yes, I wish to participate at the oral examination
-----------------------------------------------------------------------------------	----------------------------------------------------------------------------------------

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

In order to present a comprehensive case and contribute to discussions on other sites.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

Please use a separate copy of Part B for each separate comment/representation.

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3. To which part of the Local Plan does this representation relate?							
Policy	LPA 05-1	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Strategic Housing Sites			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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-----------------------------------------------------------------------------------	----------------------------------------------------------------------------------------

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In order to present a comprehensive case and contribute to discussions on other sites.



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PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPA 06 and Table 4.8	Paragraph / diagram / table		Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				<i>Safeguarded Land</i>			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

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See attached covering letter from Mark Krassowski Walsingham Planning and Supporting documents .

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached covering letter from Mark Krassowski Walsingham Planning.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.
After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination



Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order to present a comprehensive case and contribute to discussions on other sites.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

Our Ref: MK/KN0024/19

13th March 2019

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Dear Sir/ Madam

Submission Draft – St Helens Borough Local Plan 2020 -2035

Following detailed consideration of the Submission Draft Local Plan, together with relevant supporting documents, we are instructed by Muller Property Group to make representations on their behalf to the draft Plan. Our client considers the draft Plan and in particular, Policy LPA05, LPA05.1 and LPA06 to be unsound and specifically, not justified, not effective and inconsistent with government guidance contained in the NPPF. ✓

In order to make the Plan sound we consider that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be deleted from the Green Belt and allocated for housing under Policy LPA05 Table 4.5 and Policy LPA05.1. Please find appended to this letter a site location plan identifying the extent of the site to be allocated. In the event that the Council consider that there are more suitable sites to allocate for housing to meet housing need over the Plan period, we are of the view that the site should be designated as safeguarded land under Policy LPA06 Table 4.8. Our reasons for this are set out below. ✓

Housing Requirement

Policy LPA05 sets out a housing requirement of 9,234 dwellings for St Helens for the Plan period 2016 -2035. With a residual requirement of 7,245 dwellings, taking account of expected housing completions to April 2020. Table 4.6 which accompanies Policy LPA05 indicates that the Council anticipate the residual housing requirement being met by 5,550 dwellings from sites identified in the SHLAA (of which four sites are proposed to be allocated for housing with a total capacity of 2,029 dwellings) and 2,056 dwellings from six sites removed from the Green Belt and allocated for housing. ✓

The Plan thus proposes that circa 73% of the housing requirement for the Plan period will come from SHLAA sites, of which only 27% are allocated sites, with another 27% of the housing requirement being met by sites removed from the Green Belt and allocated for housing. This means that the Council are reliant upon 46% of their total housing requirement for the Plan period coming from unallocated SHLAA sites. ✓



Government guidance contained at paragraph 67 of the NPPF requires that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. It is our view that such a heavy reliance on unallocated sites contained in the SHLAA means that the Council are unable to robustly demonstrate a sufficient supply of available, suitable and viable sites. The Plan is therefore unsound on account of it being contrary to government guidance contained in the NPPF.

It is also worthy of note that the Plan fails to demonstrate a mix of different sizes of site. Indeed, the Plan fails to allocate any sites with a capacity of less than 180 dwellings and seven of the ten sites allocated for housing have an indicative capacity of 350 dwellings or more. This is entirely contrary to paragraph 67 of the NPPF as well as paragraph 68, which requires that LPA's "*identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing equipment on sites of less than 1 hectare*".

The Council's strategy appears to be to allocate a small number of large sites rather than a larger number of sites of varied scales. This approach is in our view unsound as it is contrary to advice contained in the NPPF and it is not justified. We also question the effectiveness of the Plan on the basis of its ability to deliver the Local Plan housing requirement. Such an over reliance on large sites raises questions about how quickly these sites can be delivered bearing in mind they are more likely to be subject to infrastructure constraints and technical issues.

In order to address these issues, we are of the view that there is a need to allocate an increased number of sites for housing and that the additional allocations should comprises smaller sites of up to 150 dwellings. Such sites are less likely to be subject to constraints that will delay development and will ensure the delivery of new housing in the early part of the Plan, thus safeguarding against issues of under delivery. It is considered that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be removed from the Green Belt and allocated for housing.

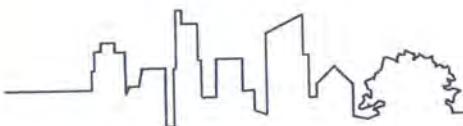
① suggested mods

Housing Allocations

Policy LPA05 (including Table 4.5) and LPA05.1 set out the Council's proposed housing allocations for the Plan period up to 2035. The policy proposes ten housing allocations. Four allocations in the urban area (3HA, 6HA, 9HA and 10HA) and six allocations which comprises land which it is proposed to remove from the Green Belt and allocate for housing (1HA, 2HA, 4HA, 5HA, 7HA and 8HA). The Council consider the removal of land from the Green Belt to be necessary in order to meet the Plan housing requirement, as there is insufficient land within the urban area to accommodate identified needs.

The Council's approach is considered sound, insofar as there is a clear and evidenced need to identify land for removal from the Green Belt in order to achieve the amount of housing required over the Plan period. Identified capacity within the urban areas of the Borough is clearly insufficient to meet the specified need and St Helens contains no land that is outside of both the urban area and Green Belt (the Green Belt being tightly drawn around the established built up area). However, the Green Belt Review itself and the methodology adopted to determine which sites should be removed from the Green Belt (both for housing allocations and safeguarded land) is considered to be flawed and entirely unsound. This has resulted in housing and safeguarded land allocations that are unsound and are not justified, not effective and inconsistent with government guidance contained in the NPPF.

①
②



A detailed examination of the Green Belt Review shows that there were four stages to the process of selecting sites for allocation (both housing and safeguarded land). Stage 1 involved assessing sites against three of the five purposes of including land in the Green Belt as set out in the NPPF. Work undertaken at Stage 1 appears sound, including the reasons for not assessing land against purpose four and five. Stage 2A involved excluding sites with clear constraints that would either entirely prohibit development or severely restrict it (by more than 2/3 of the site area). Work undertaken at Stage 2A appears on the face of it also to be sound.

Significant issues arise however at Stage 2B and it is from this point onwards that the document and the resultant assessment of individual sites becomes fundamentally flawed and it becomes an unsound basis on which to formulate development plan allocations. Indeed, we have examined a number of Green Belt Reviews and have never seen one that adopts such a methodology whereby a decision on which sites are carried forward or rejected are made with only a limited amount of desk-based information, no specialist / technical input or assessments and using a tick box checklist and officer interpretation.

It appears to be the case that at Stage 2B, sites are considered against a list of criteria which provide an assessment of a site's suitability, availability and viability for housing development, together with its accessibility. Such an assessment is not standard practice for a Green Belt Review and seems to go beyond the scope of what such a review is intended to do. Notwithstanding this fact, the assessments are in our view fundamentally flawed as they are not based on any robust technical information or assessments, which has resulted in incorrect conclusions being reached in respect of some sites. These sites have as a consequence, then scored lowly in Stage 2 and incorrectly determined to have limited development potential. Furthermore, all sites that reach Stage 2 have been classified according to the result of the Stage 2B assessment as having either good, medium or limited development potential (with a score of 3, 2 or 1). The Green Belt Review provides no explanation as to how these different scores are reached, meaning that it is impossible to know why a site has a particular score and in particular, a low one.

The effect of Stage 2B being unsound is that sites that make little or no contribution to the five purposes of including land in the Green Belt and that are suitable, available and viable for housing development to meet identified need have not been allocated for housing.

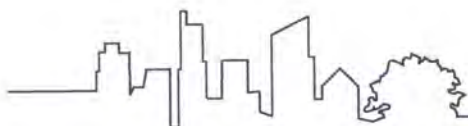
Land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) is one such example and a parcel of land that we consider should be removed from the Green Belt and allocated for housing. In terms of its contribution to the purposes of including land in the Green Belt, the site is assessed as making "*little or no contribution to the 3 purposes assessed as part of the review. The site is well contained with strong boundaries and does not form part of the wider strategic gap*". In terms of Stage 2A, the site is considered to pass as it contains no constraints that will prohibit or severely restrict development.

With regard to Stage 2B, the site scores poorly (1 out of 3) and is deemed to have limited development potential. The reasons for this seem to relate to a number of constraints that have been identified by the Council. We disagree very strongly with the assessment and its conclusions, particularly as it is clear that there are no technical assessments or information to support the Council's conclusions, which appear to be based entirely on personal opinion and a limited amount of desktop constraints work. Contrary to the views of the Council, we consider that the site has good development potential and furthermore, could deliver new development (circa 150 dwellings) within the next five years / early part of the Plan period.

Looking in more detail at the Council's assessment, a number of specific constraints / issues are identified. These are considered in turn below:

- *Substantial buffer to the M62 to provide protection for noise and air quality will adversely impact on developable area* – There is scope to provide a significant buffer between any new housing and the M62 to address noise and air quality concerns without compromising housing numbers. It is considered that even with a buffer the site could still accommodate circa 150 dwellings. Furthermore, it is not uncommon to find housing developments adjacent to motorways and indeed, there are a number of such examples along the M62 corridor between the M6 junction and Liverpool. It is also worth noting that the site is not in an Area Quality Management Area. ✓
- *The site has no physical boundary on the ground and any boundary would be artificial based on noise mapping. This would be contrary to paragraph 139 of the NPPF, which in respect of Green Belt boundaries states that plans should "define boundaries using physical features that are readily recognisable and likely to be permanent"* – it is intended that the entire parcel of land to the boundary with M62 is removed from the Green Belt and allocated for housing. The motorway is a physical and permanent feature and makes a strong and defensible Green Belt boundary which will endure over time. Indeed, there would be no logic in defining a Green Belt boundary based on land ownership. Equally, there is no reason why a proposed allocation cannot include land in the control of more than one party. Our client's intention would be to provide any noise and air quality mitigation within the site, however they would equally be willing to work with the owner of the adjacent parcel of land to bring forward a larger and more comprehensive development. ✓
- *Water main, sewage pumping main and easements* – our client is aware of a water main and sewage pumping main within the site both of which have associated easements. With regard to the water main, its location in the southeast of the site and the extent of its easement is unlikely to constrain development. With regard to the sewage pumping main, whilst this is likely to influence the layout of the site, its location and the extent of the easement will not significantly impact on the capacity of the site. There may also be scope to divert it. With regard to the electricity cable, this could be diverted if required. ✓
- *Whilst access is possible via Clock Face Road, a secondary access would be difficult to achieve* – there are a number of options with regard to access to the site. There is an existing established means of access to the site off Clock Face Road to the north via Sweet Brier Court. There is also established means of access directly to the south of properties on Bridge Road. There may additionally be scope to bring an access road from the existing residential area to the west of Clock Face Road. However, dependent upon the number of dwellings proposed, it is not necessarily the case that development would require more than one means of access particularly, if there were a secondary emergency access. ✓

Notwithstanding the information above, in order to assist the Council in re-appraising the site in light of our comments above, we have carried out a detailed assessment of the site in terms of its availability, suitability and viability which is appended to this letter. It shows that the site is developable and could deliver a significant number of dwellings. ✓



Our client intends to carry out survey/ assessment work in order to provide more detailed information in respect of the site's development potential which we would be happy to share with the Council. This is likely to include an Ecological Assessment, a Noise Assessment (to robustly identify a developable area), detailed access design with capacity assessment and safety audit, desk-based Ground Investigation, Sub-scan Survey to identify services, Utilities Assessment, Tree Survey, Air Quality Assessment and Landscape and Visual Assessment. Our client also intends to prepare an indicative site layout plan for the site. ✓

More Appropriate Housing Site

Whilst we consider that the Council needs to allocate more land for housing in order to ensure that the Local Plan housing requirement can be met and in particular, that the Plan should allocate smaller sites which will deliver new housing within the first part of the Plan period. In the event that the Council do not allocate additional sites, we consider that a reassessment must be carried out of the sites that are proposed for removal from the Green Belt and allocation for housing or future safeguarding and compared with land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078). ①

It is our view, together with PGLA who have undertaken a Comparative Site Study, that the aforementioned site makes less contribution to the three purposes of including land in the Green Belt than do a number of other parcels of land that are identified for removal from the Green Belt. Indeed, if reference is made to the Site Assessment Proformas for Sites 1HA (GBP_025), 4HA (GBP_074) and 8HA (GBP_019), it is clear that parcels of land within these large sites are considered to make a medium contribution to a number of the purposes of including land in the Green Belt, whereas land south of Clock Face / north of the M62 makes a low contribution to all three purposes. ✓ ① ③ ⑤

It cannot be right, and the Plan cannot in our view be considered to be sound, in circumstances where land which has a more important role to play in terms of the purposes of including land in the Green Belt is proposed for removal, as compared to land which is of less importance. The Plan and in particular, Policy LPA05 and LPA05.1 are thus in our view not justified, not effective and are inconsistent with government guidance contained in the NPPF. We accordingly, consider that these allocations should be omitted either in their entirety or in part, and that land south of Clock Face / north of the M62, Clock face is allocated for housing in their place. ① ③ ⑤

Attention is drawn in particular to allocation 4HA which is located directly to the northeast of the subject site. Large parts of this site (GBP_074A and 074B which comprises circa 70% of the site) have been found to make a medium contribution to one of the three assessed purposes of including land in the Green Belt. Furthermore, this land forms a substantial part of the Bold Forest Park, which is subject to its own Area Action Plan (Bold Forest Area Action Plan) adopted in 2017. The document sets out the following Vision for the area: ✓

"By 2030 Bold Forest Park will be at the heart of a thriving diverse economy, providing a hub for family leisure and adventure sports. The natural environmental and cultural environment will be rich and diverse. A network of open spaces and routes accessible to all connects the Forest Park to the wider countryside and links to our local communities". ✓

Whilst it is acknowledged that the document notes that some land within the AAP area may be required to meet the Borough's housing and employment needs, it is in our view entirely perverse to remove land which has been allocated for leisure, recreation and tourism uses, particularly land that ③

lies within the Green Belt, when there are alternative available, suitable and viable sites within close proximity that could meet the need for housing land over the Plan period. Such a situation is even more perverse when considering there is an alternative site within 570 metres that is less important in terms of the purposes of including land within the Green Belt, is available for development now and is in a more accessible and sustainable location with better access to local shops, facilities and services. ✓

To conclude, we consider Policy LPA05, including Table 4.5 and LPA05.1 to be unsound. Specifically, we consider that sites 1HA (GBP_025), 4HA (GBP_074) and 8HA (GBP_019) should be deleted or at the minimum their boundaries amended such that only land which makes a low contribution to all three purposes of including land in the Green Belt is allocated for housing. Furthermore, we consider that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be allocated for housing (150 dwellings) in Policy LPA05 Table 4.5 and LPA05.1. Contrary to the conclusions of the Green Belt Review, the site is not constrained such that it would substantially limit the development capacity of the site. Indeed, we are confident it could deliver circa 150 dwellings. ✓

Furthermore, it is material to any assessment of alternative sites that our client's site is available for immediate development and as such, could deliver new housing within a relatively short period of time and certainly within five years. It is also worth reiterating at this point that the NPPF is clear in its guidance to LPA's and that they should identify both a sufficient supply and a mix of different types and sizes of sites. To rule out our client's site on the basis of the number of units it might deliver in the absence of any technical assessments to support and evidence this conclusion renders the Council's approach flawed, ineffective and unjustified and therefore the housing policies wholly unsound. ✓

Safeguarded Land Allocation

Policy LPA06 identifies a number of sites that the Plan proposes be removed from the Green Belt and safeguarded for future housing or employment development. In the Preferred Options Local Plan (December 2016), it was proposed that our client's land be removed from the Green Belt and safeguarded for future housing development. ✓

It is our view that the site should be allocated for housing development over the Plan period. The reasons for this are set out above. However, in the event that the Council determine that sufficient land has been allocated for housing and that Policy LPA05 and LPA05.1 of the draft Plan are sound, we believe that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be reallocated as safeguarded housing land. It is however considered that the entire site to the boundary with M62 should be allocated as detailed on the attached site location plan. (4) ✓

It is our view, together with PGLA who have undertaken a Comparative Site Study, that our client's land makes less contribution to the three purposes of including land in the Green Belt than many of the proposed safeguarded housing land sites. As with the proposed housing allocations, if reference is made to the Site Assessment Proformas for Sites 1HS (GBP_025), 2HS (GBP_53), 5HS (GBP_025) and 7HS (GBP_085), it is very clear that these sites make a much greater (medium and high) contribution to the purposes of including land in the Green Belt than our client's site. The remaining sites make an equal (low) contribution to the purposes of including land in the Green Belt and thus perform no better or worse in Green Belt terms than our client's site. (4) ✓

It cannot be right in our view, and indeed such an approach is clearly flawed and unsound, that sites that make a greater and more important contribution to the purposes of including land in the Green Belt are proposed for removal and allocation as safeguarded housing land in advance of land which ✓

makes less contribution and is of less importance in terms of the purposes of including land in the Green Belt. As such, we consider that if land to the south of Clock Face/ north of the M62, Clock Face is not to be allocated for housing in the Local Plan then it should at the very least be allocated as safeguarded housing land as was previously proposed in the Preferred Options version of the Plan.

Indeed, the only reason it seems not to have been allocated as safeguarded housing land is because the Council deemed it to be subject to constraints which will severely constrain its development potential. This resulted in the site scoring only 1 point at Stage 2B of the Green Belt Review and it failing to score highly enough to fall with the "top sliced" (see paragraph 2.57 of the Green Belt Review) group of sites which were carried forward. Indeed, had the site scored 2 points at Stage 2B, it would clearly have fallen within the "top sliced" group and thus have been allocated as safeguarded housing land. As we have previously stated given the Council's assessment of the site's developability and capacity has not been based on robust technical information, but merely high-level desktop work and officer interpretation, the Green Belt Review and resultant conclusions and allocations have to be considered unjustified and not effective and thus entirely unsound.

Having regard to the extent of our concerns about the Green Belt Review and the conclusions that have been reached in respect of individual sites, our client commissioned a Comparative Site Study of the housing and safeguarded land allocations and Muller Property Group's site (Appended to this letter). The study looks at each site in terms of their contribution to the purposes of including land in the Green Belt and their developability. The comparative assessment clearly shows that our client's site performs as well as each of the housing and safeguard land allocations and in many cases better.

Policy LPA06 'Safeguarded Land'

Given the current climate with regard to housing land, it is not beyond the realms of possibility that housing land supply may at some point during the Plan period fall below the five years required by the NPPF. As a safeguard, it is suggested that Policy LPA06 should be amended to enable safeguarded housing sites to come forward for development during the Plan period in circumstances where the Council are unable to demonstrate a five-year supply of land for housing. This is considered particularly important given the Council's heavy reliance on unallocated sites contained in the SHLAA to meet the Plan housing requirement and the small number and large size of the proposed housing allocations. Such an approach is commonplace and features in many development plans.

Without this flexibility Policy LPA06 is considered ineffective and contrary to government guidance contained in the NPPF and therefore unsound.

Conclusion

To conclude, we consider that Policies LPA05 including Table 4.5, LPA05.1 and LPA06 are unsound and specifically are not justified, not effective and contrary to government guidance contained in the NPPF. We consider that this can be addressed by allocating more land for housing and in particular, a range of smaller sites of less than 180 dwellings and by deleting and replacing some of the Green Belt housing allocations and safeguarded housing land allocations.

We are of the firm view that land to the south of Clock Face / north of the M62, Clock Face (Site GBP_078) makes less contribution to the purposes of including land in the Green Belt when compared to a number of other sites/ parcels of land that have been proposed for allocation for housing. It is therefore considered that these sites / parcels of land should be deleted and that our client's land

should be allocated in their place. The supporting Site Assessment Document appended with this letter demonstrates that our client's land is not subject to significant constraints, contrary to the conclusions of the Council's Green Belt Review and is developable and capable of delivering circa 150 dwellings. Furthermore, it is located in a highly sustainable location with good access to local shops, services, facilities and public transport and could deliver new housing within a short period of time.

In the event that the Council, conclude that there are other sites which make a lesser contribution to the purposes of including land in the Green Belt that should thus be allocated in advance of our client's land, we consider that the land should at a minimum be removed from the Green Belt and allocated as safeguarded housing land to meet future need beyond the Plan period or in the event of an issue with housing land supply and it falling below five years. The site very clearly makes little if any contribution to the purposes of including land in the Green Belt as is confirmed in the Green Belt Review and the proposed new boundaries to the Green Belt are strong, defensible, robust and will endure over time. There is therefore no valid planning reason for retaining its Green Belt designation. There is also no limit to the number of sites that can be allocated as safeguarded land and therefore there is no reason why our client's land should not be allocated as safeguarded housing land.

We trust that the information contained in this letter and the accompanying documents are useful to you. Should you require any additional information or wish to discuss matters further, please do not hesitate to contact us. Having regard to our comments above, we would also very much welcome the opportunity to meet with you to discuss the site in more detail.

Yours faithfully

Mark Krassowski BA (Hons) BSc MRICS
Director

CC Steve Bourne, Muller Property Group
Paul Gray, PGLA

Enc. Site location plan
Site Assessment Document
Comparative Site Study

Land south of Clock Face, St Helens
COMPARATIVE SITE STUDY

MULLER PROPERTY GROUP

March 2019

FINAL REPORT



Quality Checked	
Document: CLO1902_CSS01 Revision - FINAL REPORT	
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01. INTRODUCTION

PGLA Landscape Architects have been commissioned by Muller Property Group to review a site off Bridge Road, Clock Face, St Helens (referred to as the Clock Face site throughout this report) that they have a long-term option on with a view to support its release from the current Green Belt land status.

In 2018 St Helens Borough Council (SHBC) carried out a Green Belt Review which tested a number of potential sites for release from Green Belt for future residential and employment allocation within the next Local Plan. Following on from this study the St. Helens Borough Local Plan 2020-2035 Submission Draft – Policies Map has been produced. This Plan has identified several sites that the Council propose to take forward into the next plan period.

The Clock Face site was previously included in the Local Plan as Safeguarded Land to prepare for future housing requirements, however, in the Green Belt review the site has become discounted even that it is accepted that it does not contribute to the reasons for the green Belt as laid out in the NPPF. The review has erroneously concluded that it can not be developed to produce a significant contribution to the Boroughs Housing numbers due to physical constraints on site.

The aims and objectives of this report are to demonstrate that the site does not contribute to the Green Belt and is not constrained by physical barriers that cannot be overcome and therefore the site should be released from the Green Belt and become an allocated site for housing or at the very least be classified as Safeguarded Land released from the Green Belt for future development.

Furthermore, the report will review several other sites that have been put forward for allocation or as safeguarded land to seek comparisons that support the Clock Face site allocation. This exercise is presented with sheets that measure the Councils own appraisal from the Green Belt Review for the selected comparative sites and the PGLA comments are added as summaries in each section, which includes a review of the importance of the sites in terms of landscape value and the quality of the visual amenity. The Clock Face Site is also reviewed and supported by a simple development plan that demonstrates that circa 150 homes could be developed to contribute to the housing need.

The report is finalised with a Summary and Conclusion that demonstrates that the site scores equally or in some cases better on the criteria used to decide on the site's suitability for allocation.

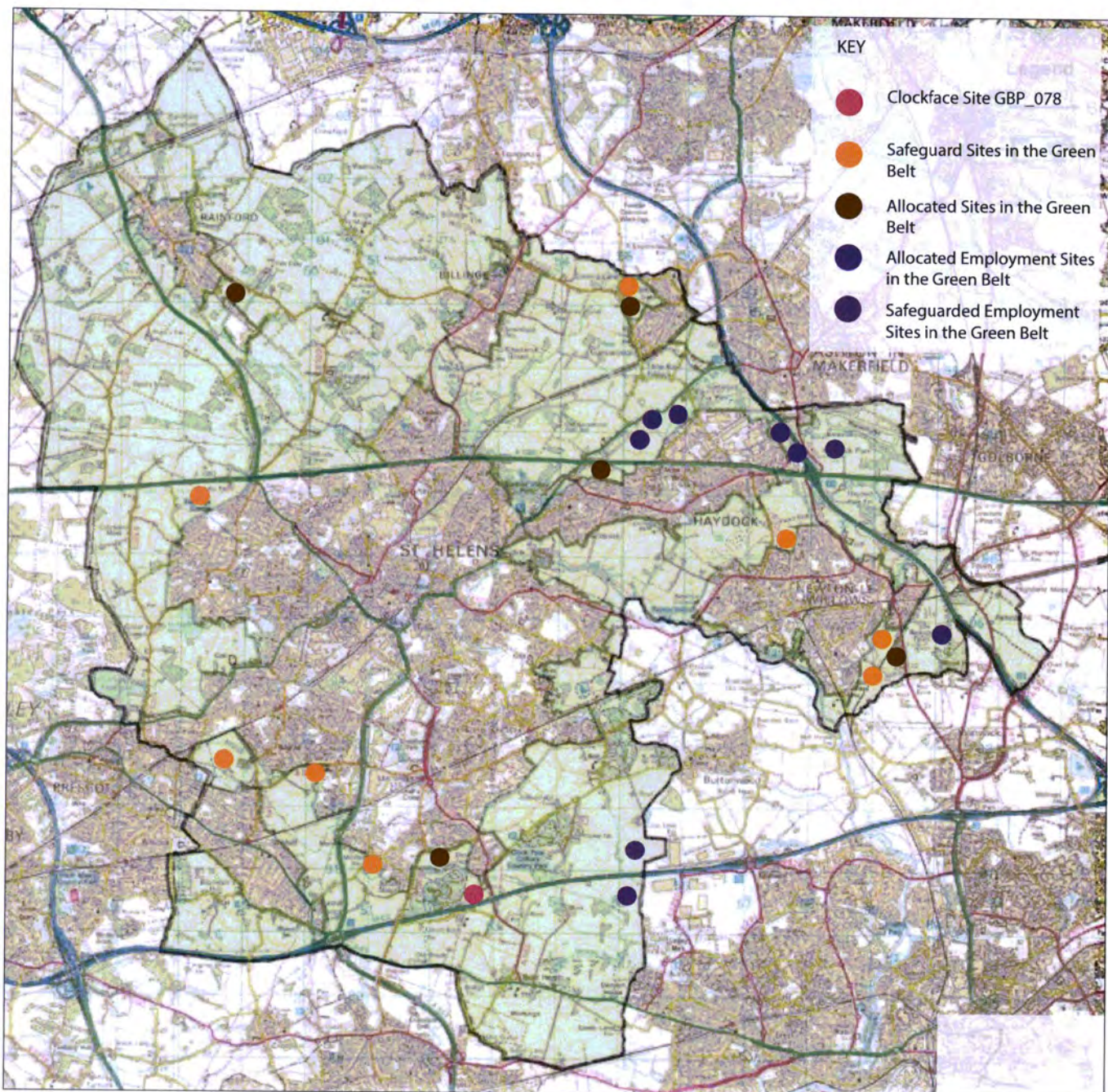


Figure1. Allocated and Safeguard Sites for Green Belt Release

02. LAND SOUTH OF CLOCKFACE, NORTH OF THE M62



Figure 2.1. Site Appraisal Drawing

COMMENTS ON THE GREEN BELT REVIEW

Site: SHBC Green Belt Review Site: GBP_078
 Land south of Clock Face, north of the M62
 Size: 15.85 ha (Total Parcel)

Stage 1B Assessment against Green Belt Purposes: *Low*

This parcel makes little or no contribution to the 3 purposes assessed as part of the review. The site is well contained with strong boundaries and does not form part of the wider strategic gap.

PGLA Comment – Agree with above. Furthermore, the site offers low landscape value and low visual quality.

Stage 2 Allocate, safeguard or discount: *Discount.*

The review states this is due to close proximity to M62; no clear definable boundary for Green Belt; water main and other services present on site and no secondary access available.

PGLA Comment – Disagree with above. Figure 2.1 demonstrates that the site can be developed to provide circa 130 – 150 dwellings dependant on house type and density as well as providing open space and a strong landscape framework for the development. The M62 will form the natural boundary to the Green Belt and furthermore, there is an existing hedge that delineates the field line to the south. This is reasonably substantial in its current form but will benefit from gap filling and tree planting as part of the development proposals. There is an opportunity to provide two safe access points from Sweet Briar Court and Clock Face Road to the south of the site.

02. LAND SOUTH OF CLOCKFACE, NORTH OF THE M62



Figure 2.2. Aerial of Site courtesy of Google Earth



03.1 LPSD: 1HS Land south of Leyland Green Road, Garswood.

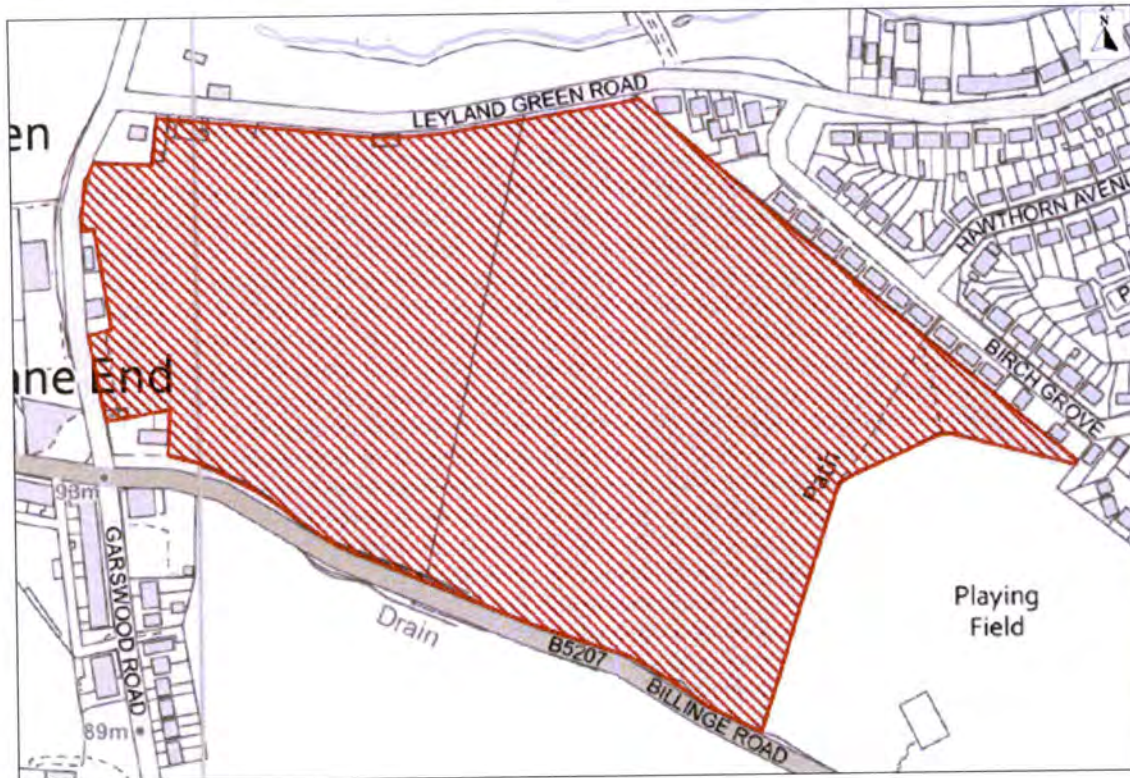


Figure 3.1.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_025A (GB Review) LPSD: 1HS
Land south of Leyland Green Road, north of Billinge Road and east of Garswood Road, Garswood. Windle
Size: 20.86 ha (Sub Parcel)

Stage 1B Assessment against Green Belt Purposes: *Medium*

The sub-parcel is not adjacent to a large built up area but does adjoin the settlement of Garswood and does help prevent ribbon development along parts of Leyland Green Road and Billinge Road. The parcel is not well contained as it is partly open to the north and entirely to the west.

PGLA Comment – Disagree with above. When considering Purposes 1 and 2 (to check unrestricted sprawl) and (protect the countryside from encroachment) it is clear that this site does not perform as well as the Clock Face site.

However, this site offers medium landscape value and medium visual quality due to the open relationship with the countryside to the west and north. The Clock Face site does not encroach onto open countryside in this manner and is therefore more favourable on this account.

Stage 2 Allocate, safeguard or discount: *Safeguard.*

PGLA Comment – Disagree with above. The site has several physical constraints such as high visibility and has functional linked habitats for Pink-footed Geese. The Clock Face site has no such constraints.

03.1 LPSD: 1HS Land south of Leyland Green Road, Garswood.



Figure 3.1.2 Aerial of Site courtesy of Google Earth



03.2 LPSD: 2HS Land between Vista Road and Belvedere Road, Earlestown

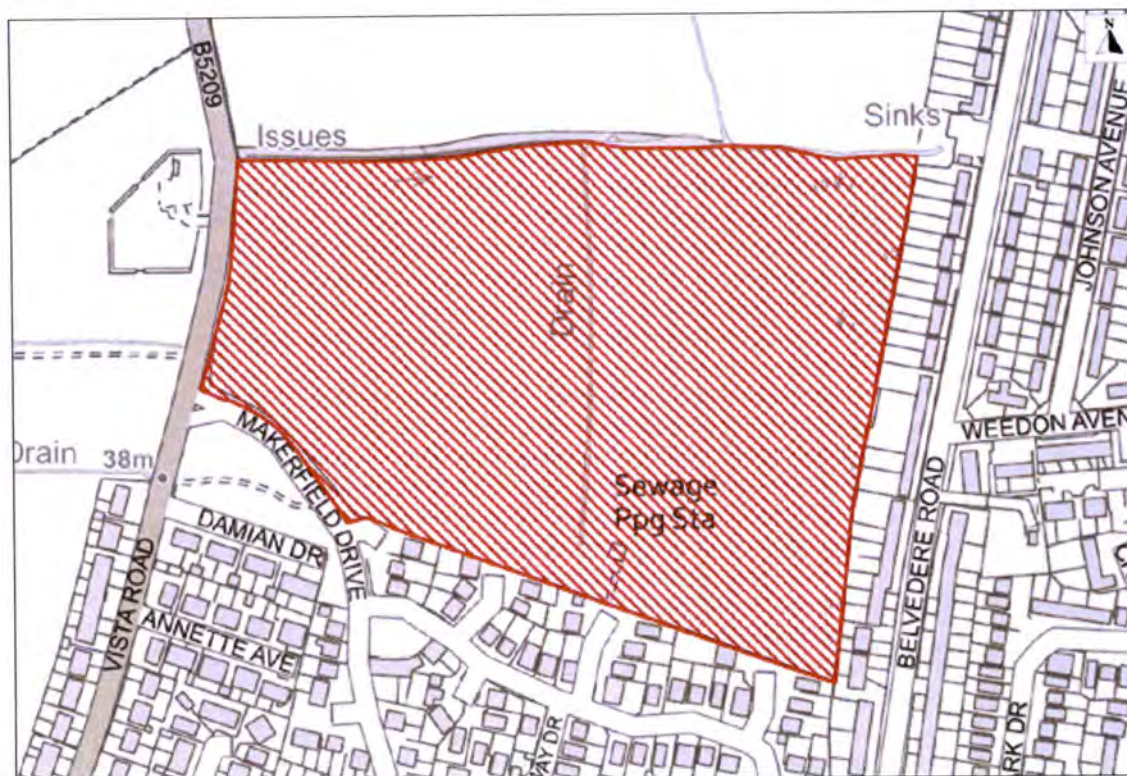


Figure 3.2.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_053c (GB Review) LPSD: 2HS
Land east of Haydock, north of Earlestown
Size: 22.8 ha (Sub Parcel)

Stage 1B Assessment against Green Belt Purposes: *Medium*

The sub-parcel adjoins the urban edge of Newton-le-Willows and the report finds that a certain amount of development could be accommodated without it leading to unrestricted sprawl and the site prevents ribbon development along Ashton Road and Vista Road. The parcel forms part of a strategic gap to the physical and visual separation of Haydock and Newton-le-Willows, however the report feels it could still be maintained even if this sub parcel is released and it would be seen as natural urban extension.

PGLA Comment – Disagree with the above. The parcel has no definable boundary to the north and therefore does not meet the criteria of purpose 1 to prevent unrestricted sprawl. The sub parcel forms part of a strategic gap between Haydock and Newtown-le-Willows / Earlestown and therefore does not perform so well as the Clock Face site as it is not within a strategic gap.

Stage 2 Allocate, safeguard or discount: *Safeguard*.

PGLA Comment – Disagree with the above. The report states that the strategic Green Belt gap would be narrowed and there is no strong, permanent boundary along the northern edge of the development area, similar to the perceived Clock Face site reason for being discounted. However the report states that if the NDA is reduced to where there is a prominent field boundary and drainage ditch along the northern boundary then it becomes acceptable, which is a far weaker boundary than found on the Clock Face site comprising of a vegetated field boundary and the M62.

There is also an Essar pipeline with easements through the site, and a pumping station on site so flooding issues will need to be addressed. The review is inconsistent when measuring its own criteria to inform the decision to allocate, safeguard or discount the sites.

03.2 LPSD: 2HS 2HS Land between Vista Road and Belvedere Road, Earlstown



Figure 3.2.2. Aerial of Site courtesy of Google Earth



03.3 LPSD: 3HS Former Eccleston Park golf club, Rainhill road, Eccleston

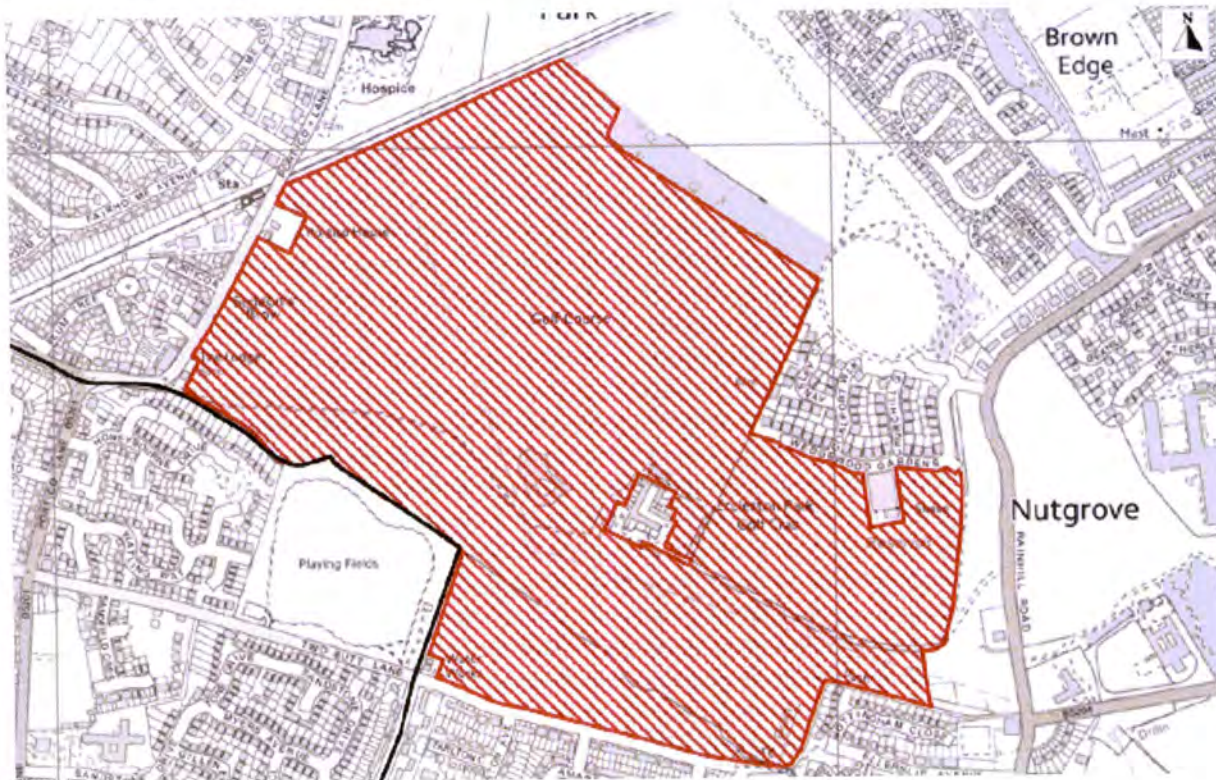


Figure 3.3.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_087 (GB Review) LPSD: 3HS
Former Eccleston Park Golf Club, Rainhill Road, Eccleston
Size: 49.37 ha (Total Parcel)

Stage 1B Assessment against Green Belt Purposes: *Low*

The parcel benefits from strong boundaries and is encroached on almost all sides by urban development. The parcel plays a limited role in the prevention of merging any two settlements or built up areas.

PGLA Comment – Disagree with above. When considering Purpose 2 (to prevent neighbouring towns merging into one another) it is clear that the large site provides substantial separation between Eccleston Park, West Park, Rainhill and Whiston. The Green Belt Review states that this already compromised and reduced by development on the north western and southern sides and no visual/perceptive separation is experienced on the ground. I agree that visually there is little connectivity but there is a strong sense of separation as a perceptible quality, especially by those that use the southern part of the site for dog walking and other recreational purposes.

Furthermore, the site offers medium landscape value and medium visual quality. The Clock Face site does not form part of any the Strategic Gap and is more favourable on this account.

Stage 2 - Allocate, safeguard or discount: *Safeguard.*

PGLA Comment – Disagree with above. The site has a number of physical constraints such as services including overhead cables with pylons and underground sewers and trunk mains and the North Prescot Aqueduct. It is questionable whether the surrounding highway junction constraints will be overcome by the development proposals.

03.3 LPSD: 3HS Former Eccleston Park golf club, Rainhill road, Eccleston



Figure 3.3.2. Aerial of Site courtesy of Google Earth



03.4 LPSD: 4HS Land east of Newlands Grange (former Vulcan works)

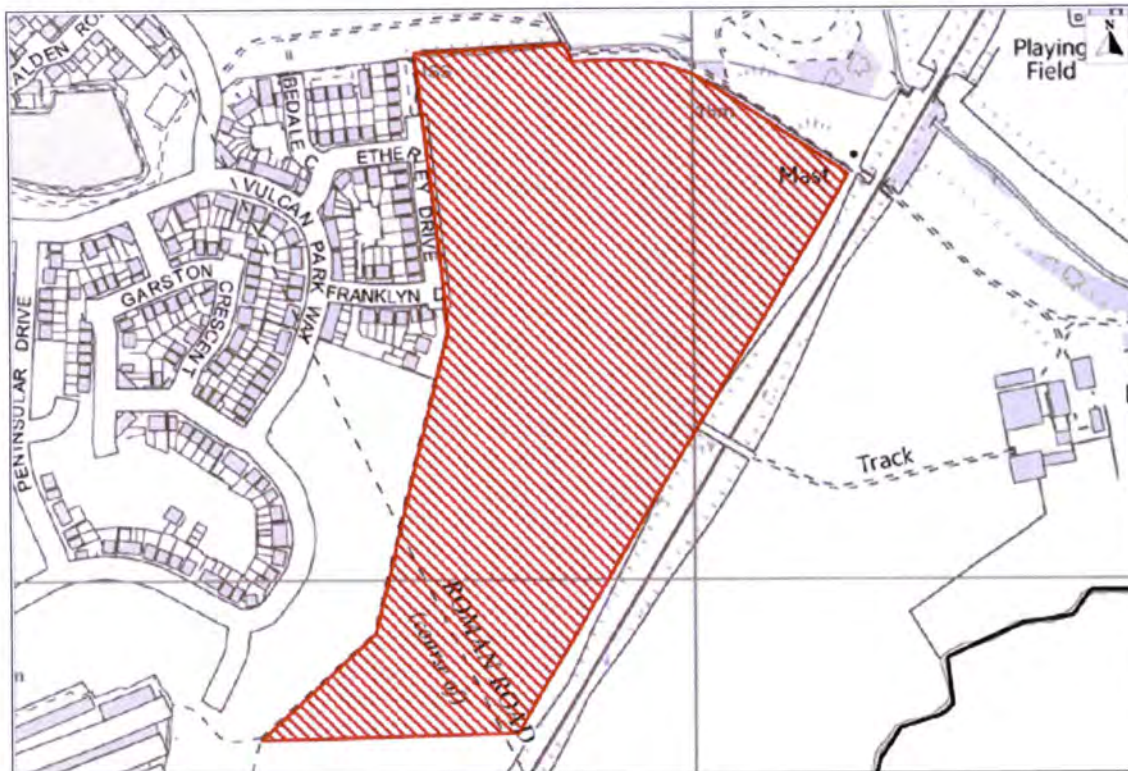


Figure 3.4.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_044 (GB Review) LPSD: 4HS
Land west of the West Coast Mainline and east of Newlands Grange
Size: 17.62ha (Total Parcel)

Stage 1B Assessment against Green Belt Purposes: Low

The parcel is well contained to the west and the railway line provides a permanent boundary to the east with limited openness to the north and south. The report finds that a strategic gap would be maintained between Winwick and Newton-le-Willows if the parcel was developed.

PGLA Comment – Agree with the above. The Clock Face site performs equally as well with defined boundaries and not being part of a strategic gap. The south of this parcel has a strong constraint with the presence of the Roman Road and the setting of the Vulcan Works Conservation Area and the NDA is likely to be restricted to the northern and eastern portions of the site.

Stage 2 Allocate, safeguard or discount: Safeguard.

PGLA Comment – Agree with the above, however, the site did not perform as well as the Clock Face site due to highway issues of Alder Root Lane low railway bridge and noise attenuation from the railway line to the east.

03.4 LPSD: 4HS Land east of Newlands Grange (former Vulcan works)



Figure 3.4.2. Aerial of Site courtesy of Google Earth



03.5 LPSD: 5HS Land west of Winwick Road and east of Wayfarers Drive

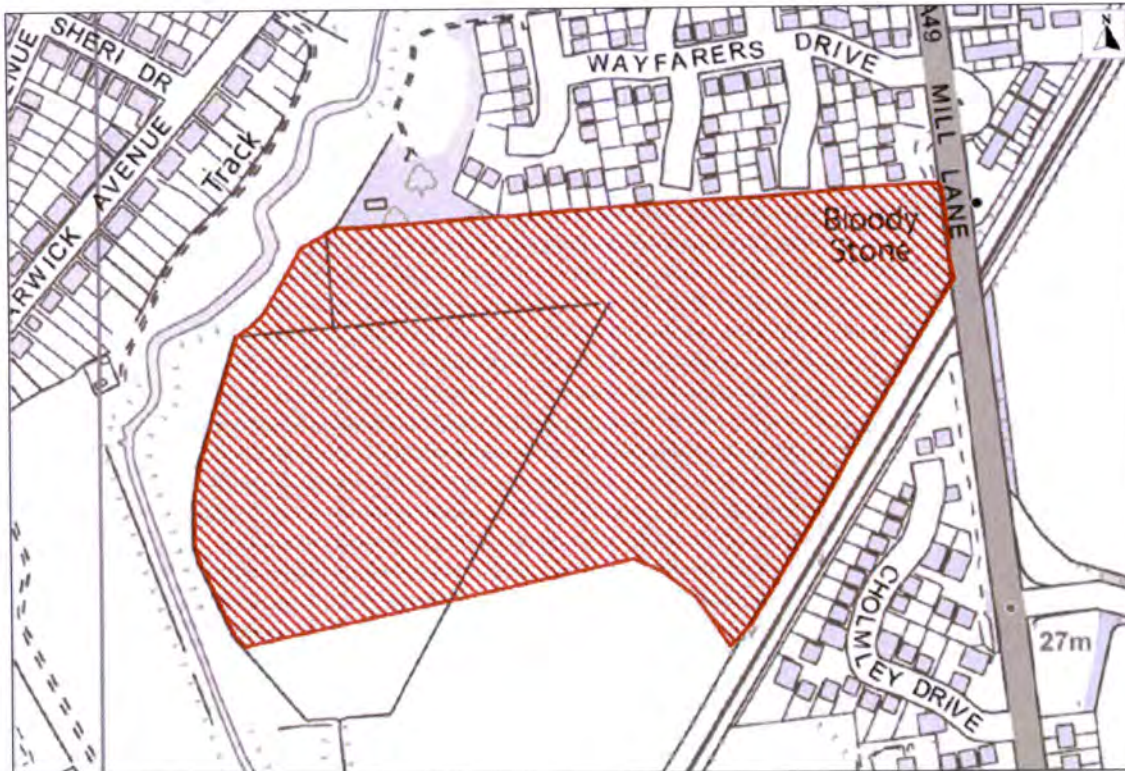


Figure 3.5.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_045A (GB Review) LPSD: 5HS
Land west of Winwick Road and south and east of Wayfarers Drive
Size: 13.5 ha (Sub Parcel)

Stage 1B Assessment against Green Belt Purposes: *Low*

The sub-parcel has strong permanent boundaries to the north and east. According to the report, given the high level of enclosure, it is considered that the sub-parcel does not have a strong sense of openness or countryside character. A strategic gap could be maintained between Winwick and Newton-le-Willows if this sub-parcel was developed, and the parcel does not form part of the existing strategic gap.

PGLA Comment – Agree with the above. The Clock Face site has similarities with this parcel as the boundaries are well defined on most edges and neither form part of a strategic gap.

Stage 2 - Allocate, safeguard or discount: *Safeguard.*

PGLA Comment – Agree with the above. The Clock Face site has similarities with this parcel as the boundaries are well defined on most edges and is appropriate for allocation or as future safeguarded land.

03.5 LPSD: 5HS Land west of Winwick Road and east of Wayfarers Drive



Figure 3.5.2. Aerial of Site courtesy of Google Earth



03.6 LPSD: 6HS Land east of Chapel Lane and south of Walkers Lane, Sutton Manor

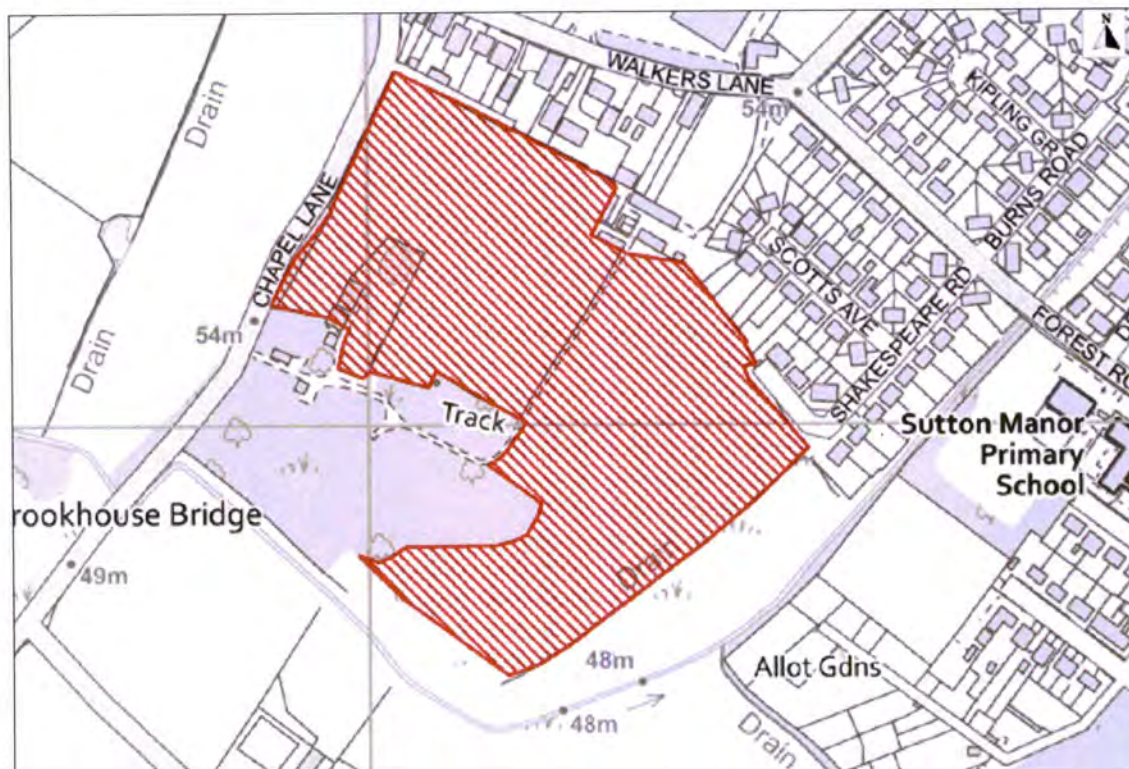


Figure 3.6.1. Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_082A (GB Review) LPSD: 6HS
Land east of Chapel Lane and south of Walkers Lane, Sutton Manor
Size: 7.33 ha (Sub Parcel)

Stage 1B Assessment against Green Belt Purposes: Low

This sub-parcel makes little or no contribution to the 3 purposes assessed as part of the review. The site is well contained with strong boundaries and does not significantly contribute to the wider strategic gap.

PGLA Comment – Agree with above. Furthermore, the site offers low landscape value and low visual quality. However, the sub parcel does form part of the larger strategic gap between Sutton Manor (St Helens Core Area) and Rainhill. The Clock Face site does not form part of any the Strategic Gap and is more favourable on this account.

Stage 2 Allocate, safeguard or discount: Safeguard.

This parcel performs similarly to the Clock Face site in terms of visual containment and two potential access points, but it is acknowledged that it is far from the nearest local centre and contains a protected woodland a Local Wildlife Site and a significant buffer for both these sensitive environmental constraints will be required significantly reducing the NDA.

PGLA Comment – Agree with above, however, the site does not perform as well as the Clock Face site due to identifiable environmental, and to a lesser degree, spatial constraints.

03.6 LPSP: 6HS Land east of Chapel Lane and south of Walkers Lane, Sutton Manor



Figure 3.6.2. Aerial of Site courtesy of Google Earth



03.7 LPSD: 7HS Land south of Elton Head Road, Thatto Heath

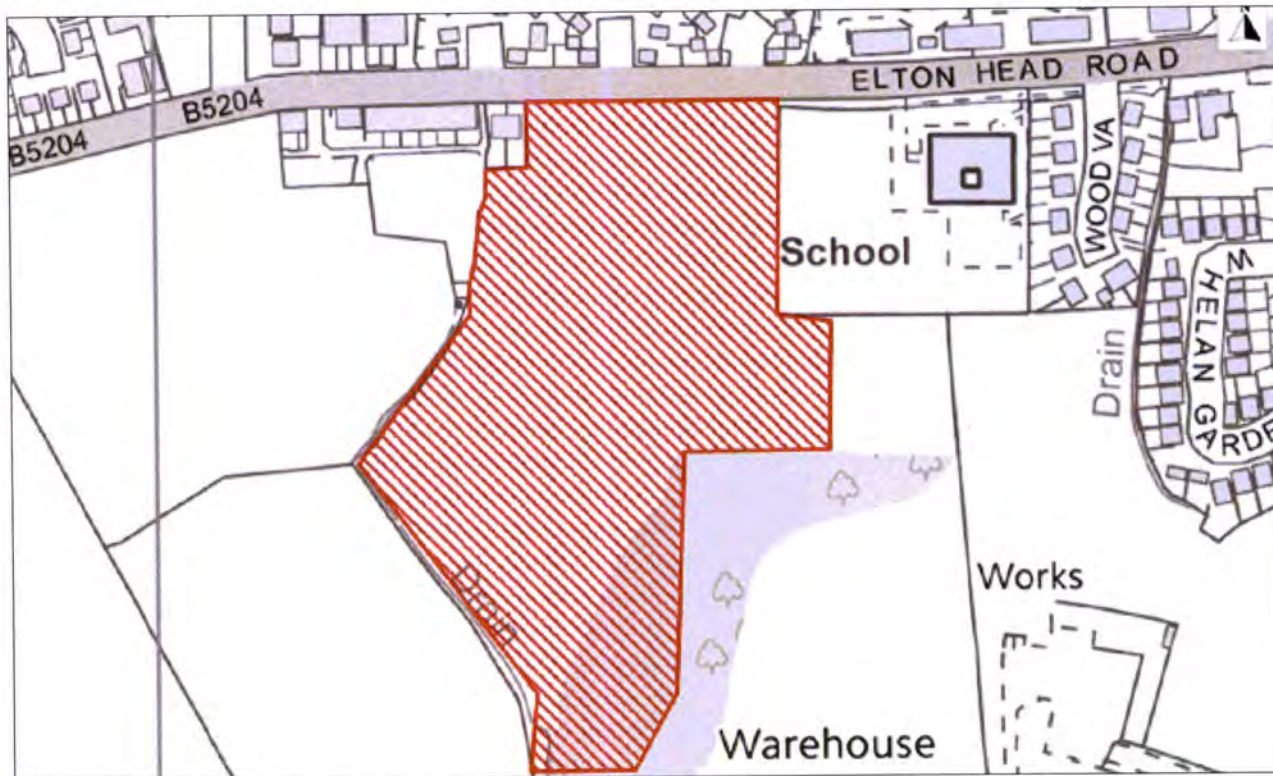


Figure 3.7.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_085C (GB Review) LPSD: 7HS
Land south of Elton Head Road (adjacent to St John Vianney Catholic Primary School), Thatto Heath
Size: 4.82 ha (Sub Parcel)

Stage 1B Assessment against Green Belt Purposes: Low

This sub-parcel makes a weak contribution to the purposes of the Green Belt.

PGLA Comment – Agree with above. Furthermore, the site offers medium landscape value and medium visual quality. However, the sub parcel does form part of the larger strategic gap between Sutton Heath / Thatto Heath (St Helens Core Area) and Rainhill. The Clock Face site does not form part of any the Strategic Gap and is more favourable on this account.

Stage 2 Allocate, safeguard or discount: Safeguard.

This parcel performs less well to the Clock Face site due to the landscape sensitivity of the site identified by SHBC as Medium to High the proximity to a scarp slope with rocky outcrops –the proposed development will cause a degree of harm to the character. The site scores well in terms of visual containment to the north, but SHBC are suggesting that the NDA will be well defined by a ‘clear, robust field boundary which runs through the sub-parcel and by the woodland and primary school to the east.’ The Clock Face site also possesses strong field boundaries to the south of the site and should also be considered as a robust defining boundary for the proposed allocation. Unlike the Clock Face site, significant buffers will be required significantly reducing the NDA on this parcel.

PGLA Comment –The site does not perform as well as the Clock Face site due to identifiable environmental, and to a lesser degree, spatial constraints. The NDA is reduced significantly and therefore it seems the site will contribute less to the housing numbers than the Clock Face site.

03.7 LPSD: 7HS Land south of Elton Head Road, Thatto Heath



Figure 3.7.2. Aerial of Site courtesy of Google Earth



03.8 LPSD: 8HS Land south of A580 between Houghtons Lane & Crantock Grove

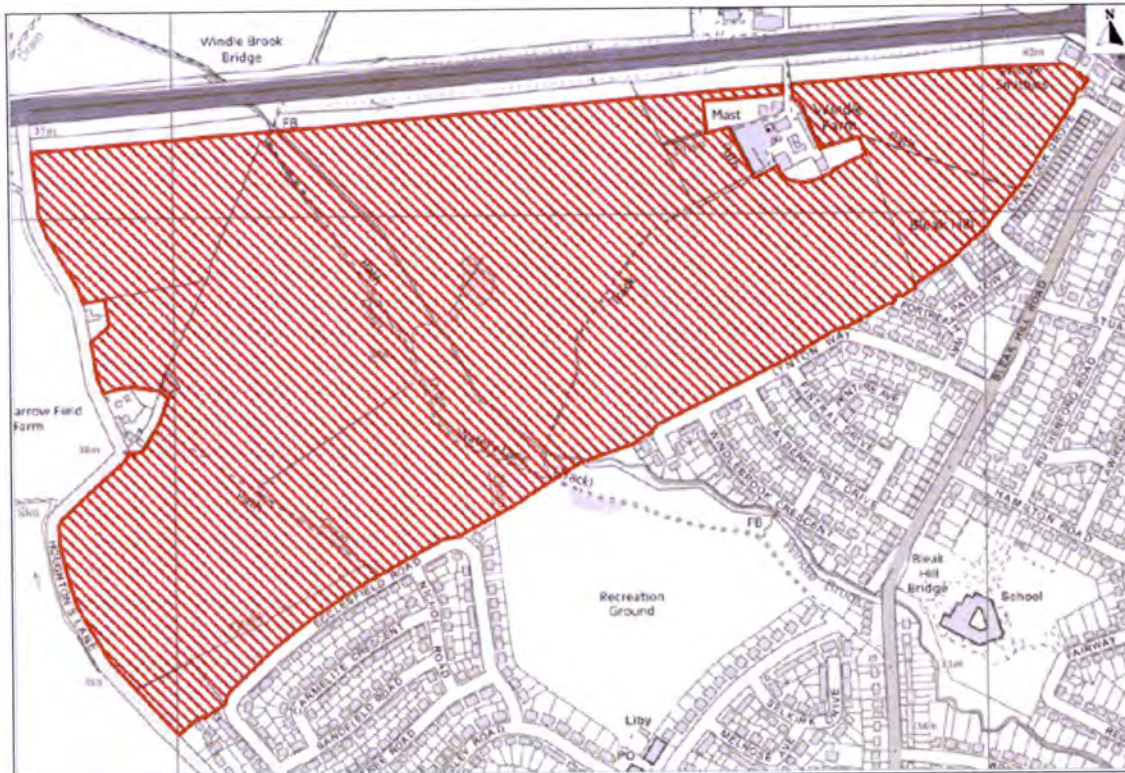


Figure 3.8.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_098 (GB Review) LPSD: 8HS
Land south of A580 between Houghtons Lane and Crantock Grove, Windle
Size: 59.79 ha (Total Parcel)

Stage 1B Assessment against Green Belt Purposes: *Low*

The parcel is well contained. The A580 to the north and the residential development to the south and east impact on the landscape character.

PGLA Comment – Agree with above. When considering Purposes 1 and 2 (to check unrestricted sprawl) and (to prevent neighbouring towns merging into one another) it is clear that the sprawl of development will be restricted by the natural boundary of the A580, just as the M62 forms a natural restriction to development on the Clock Face site. Likewise, the site is similar to the Clock Face site in that it does not cause neighbouring towns to merge into one another.

However, this site offers medium landscape value and medium visual quality due to the outward facing housing onto open countryside, especially on Eccleston Road. The Clock Face site does not encroach onto open countryside in this manner and is therefore more favourable on this account.

Stage 2 Allocate, safeguard or discount: *Safeguard.*

PGLA Comment – Disagree with above. The site has a number of physical constraints such as highway constraints when accessing from Houghtons Lane and linkages to the A580. The site also has links with European protected sites for overwintering birds as well as the proximity of Local Wildlife Site at Windle Brook. Two pipelines including a combined sewer run across the site in an alignment that will reduce the overall NDA.

03.8 LPSD: 8HS Land south of A580 between Houghtons Lane & Crantock Grove

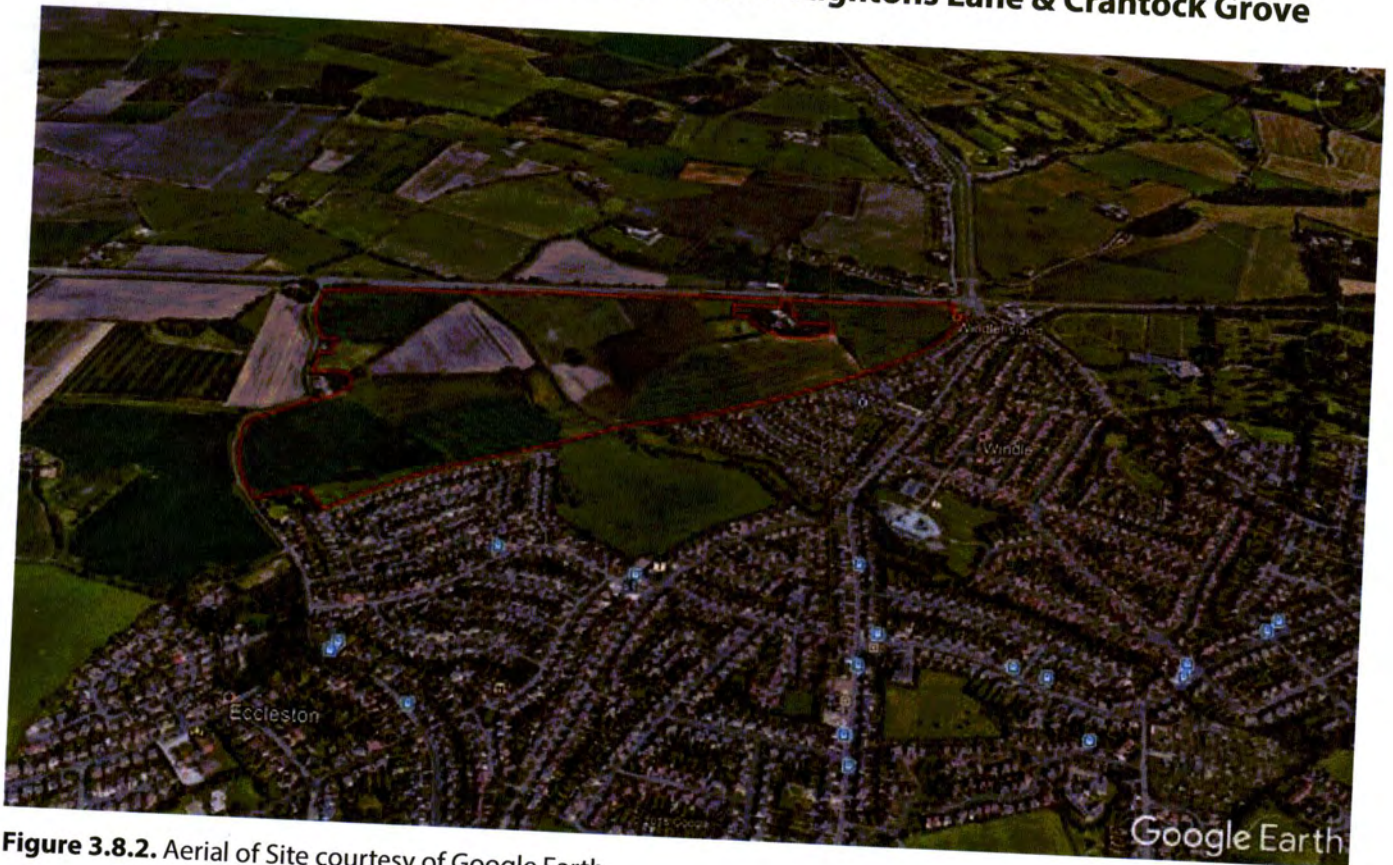


Figure 3.8.2. Aerial of Site courtesy of Google Earth



04.1 LPSD: 1HA Land south of Billinge Road, East of Garswood Road

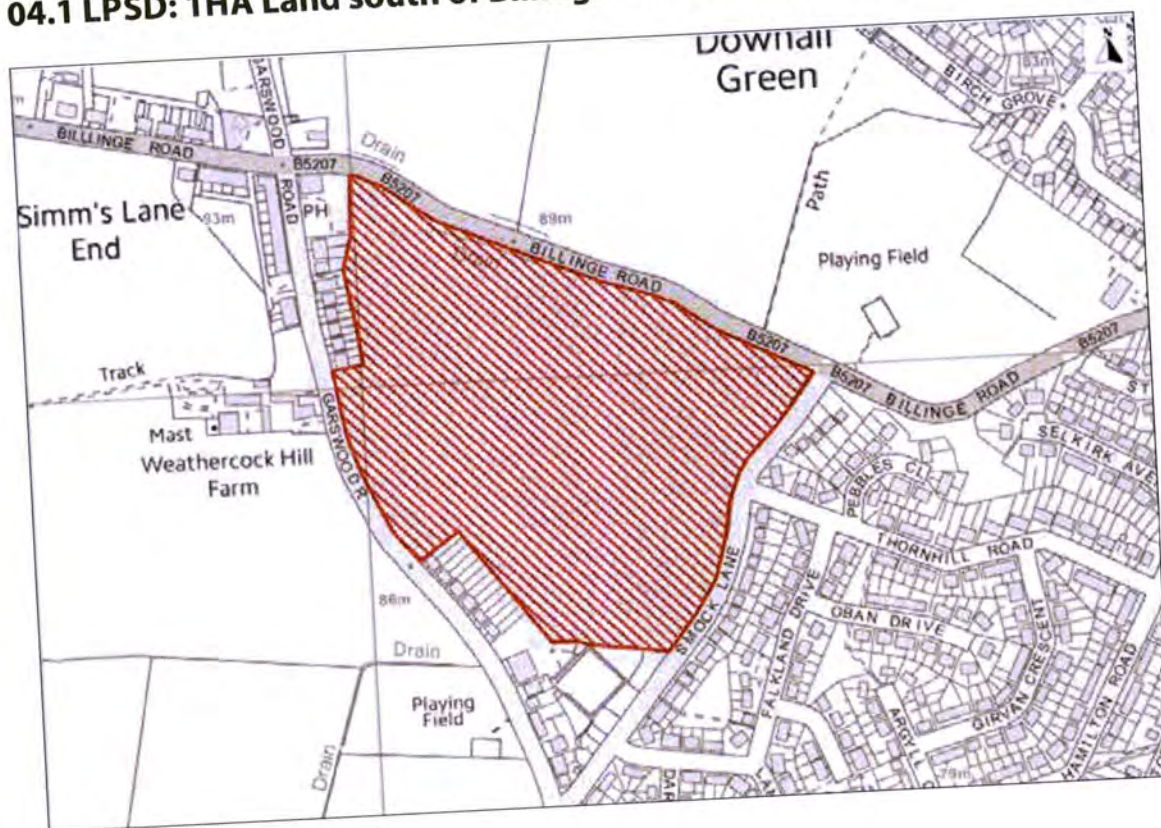


Figure 4.1.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_025_B (GB Review) LPSD: 1HA
Land south of Billinge Road, East of Garswood Road and west of Smock lane, Garswood.
Size: 10.88ha (Sub Parcel)

Stage 1B Assessment against Green Belt Purposes: *Low*

The sub parcel has strong boundaries to the east, south and west and partially on the north and is therefore partially well contained. A strategic gap could still be maintained between Garswood and Billinge if it was released from the Green Belt.

PGLA Comment – Agree with above. The Clock Face site has similarities with well defined boundaries against existing settlement and road infrastructure.

Stage 2 Allocate, safeguard or discount: *Allocate.*

PGLA Comment – Agree with above. As with the Clock Face site this parcel can provide housing due to its low contribution to the Green Belt and low level of constraints.

04.1 LPSD: 1HA Land south of Billinge Road, East of Garswood Road



Figure 4.1.2. Aerial of Site courtesy of Google Earth



04.2 LPSD: 2HA Land at Florida Farm, Slag Lane, Blackbrook

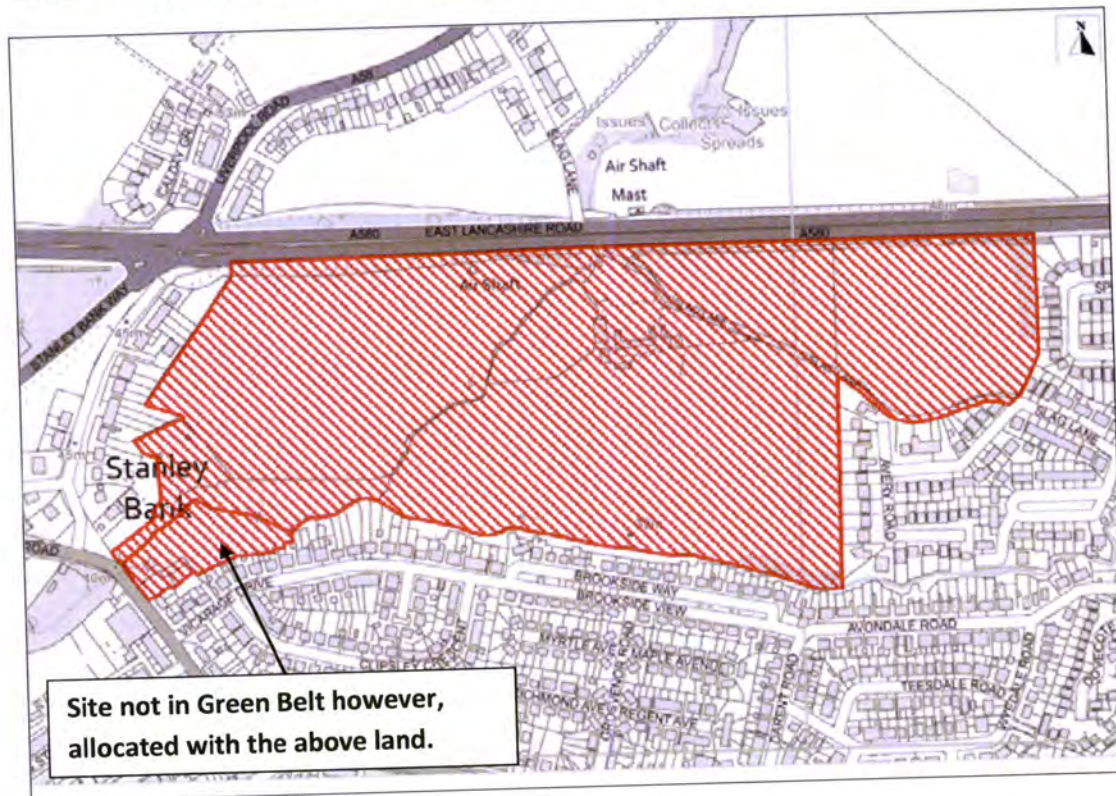


Figure 4.2.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_060 (GB Review) LPSD: 2HA
Land at Florida Farm (south of A580), Slag Lane, Blackbrook
Size: 24.32 ha (Sub-Parcel)

Stage 1B Assessment against Green Belt Purposes: Low

The parcel has strong permanent boundaries and does not have a sense of openness or countryside character.

PGLA Comment – Agree with above. The Florida Farm site has a higher landscape sensitivity and higher scenic quality than the Clock Face site, however, both sites are also adjacent to the existing settlement and major road networks and provide low contribution to the existing Green Belt.

Stage 2 - Allocate, safeguard or discount: Allocate.

PGLA Comment – Agree with above. The Clock Face site performs as well as this site due to the similarities of the M62 and A580 forming natural and well defined boundaries to the respective sites.

04.2 LPSP: 2HA Land at Florida Farm, Slag Lane, Blackbrook



Figure 4.2.2. Aerial of Site courtesy of Google Earth



04.3 LPSD: 4HA Bold Forest Garden Suburb

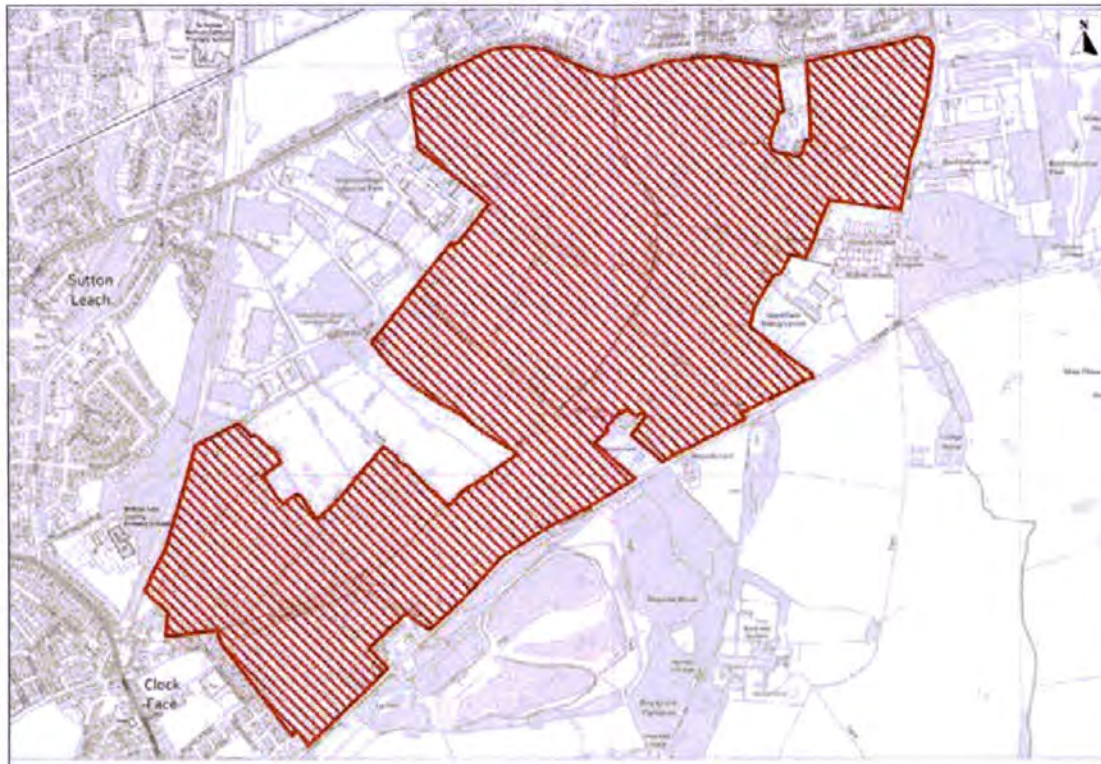


Figure 4.3.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_074 (GB Review) LPSD: 4HA
Bold Forest Garden Suburb (Land bounded by Reginald Road/Bold Road/Travers Entry/Gorse Lane/Crawford Street, Bold)
Size: 165.27 ha (Total Parcel)

Stage 1B Assessment against Green Belt Purposes: *Medium / Low*

The parcels contain a number of significant constraints for housing development such as disused colliery buildings, farm buildings, riding school and a transmitter station. GBP_074_A The sub-parcel plays a moderate role in checking the outward expansion of Sutton into the countryside, and plays no real part in a strategic gap.

GBP_074_B The sub-parcel makes little to moderate contribution to the 3 purposes assessed as part of the review. The site is fairly well contained and does not significantly contribute to the wider strategic Green Belt gap. GBP_074_C The sub-parcel plays a limited role in checking the outward expansion of Clock Face into the countryside, and plays no real part in a strategic gap. GBP_074_D The sub-parcel plays a limited role in checking the outward expansion of Clock Face into the countryside, and plays no real part in a strategic gap.

PGLA Comment – Disagree with above. The site contributes considerably to the openness of the Green Belt especially when viewed from Gorse Lane. The development of the site to provide housing development will effectively merge Clock Face with Sutton to the north. The landscape possesses a number of remnants and features from the coal mining uses and provides a higher value and scenic quality than the Clock Face site.

Stage 2 Allocate, safeguard or discount: *Allocate.*

PGLA Comment – Disagree with above. In terms of consistency this site performs far less than the Clock Face site in the reviews and it seems more appropriate that this site should be discounted or set aside as safeguarded land until a thorough understanding of how the constraints within the site can be overcome. To allocate this site as a decision resulting from the Green Belt Review and to meet the aspirations of the Bold Forest Park Action Plan 2017 seem premature at this time.

04.3 LPSD: 4HA Bold Forest Garden Suburb



Figure 4.3.2. Aerial of Site courtesy of Google Earth



04.4 LPSD: 5HA Land South of Gartons Lane, Gartons Lane, Bold



Figure 4.4.2. Aerial of Site courtesy of Google Earth



04.5 LPSD: 7HA Land west of the A49 Mill Lane and east of West Coast Mainline

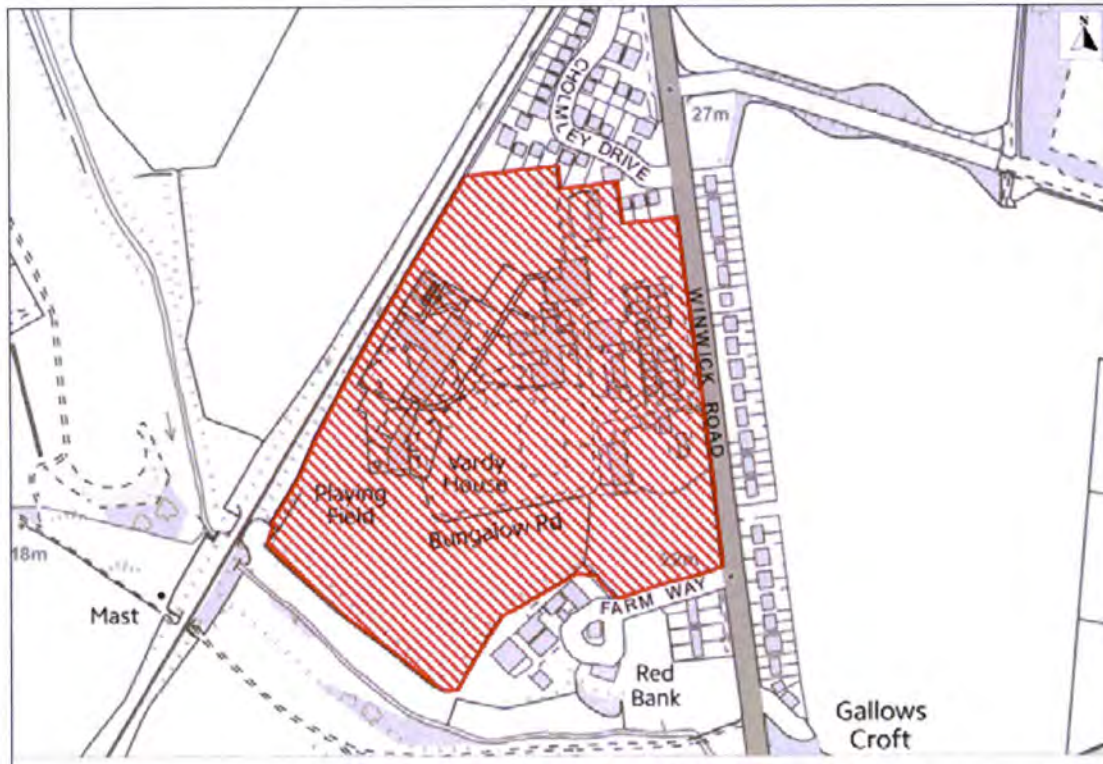


Figure 4.5.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_042_A (GB Review) LPSD: 7HA
Land West of the A49 Mill Lane and to the East of the West Coast Mainline Railway Line, Newton-le-Willows
Size: 13.72 ha (Total Parcel)

Stage 1B Assessment against Green Belt Purposes: *Low*

Given the high level of enclosure and the brownfield nature of part of the site, it is considered that development of the parcel would not lead to unrestricted sprawl and it does not have a strong sense of openness or countryside character.

PGLA Comment – Agree with above. However, the site does not perform as well as the Clock Face site due to a number of constraints such as flood risk and required noise attenuation measures from the adjacent railway line.

Stage 2 Allocate, safeguard or discount: *Allocate.*

PGLA Comment – Agree with above. Subject to following constraints:
Safe highway access should be provided from Winwick Road (with any necessary off-site improvements). Appropriate noise attenuation measures, including buffers, should be incorporated to protect new residents from unacceptable noise levels from the adjoining railway line and adjacent farm activities. Provision of effective flood management measures to reduce the risk of flooding. Existing protected trees within the site should be given due consideration.

04.5 LPSD: 7HA Land west of the A49 Mill Lane and east of West Coast Mainline



Figure 4.5.2. Aerial of Site courtesy of Google Earth



04.6 LPSD: 8HA Land south of Higher Lane and east of Rookery Lane, Rainford

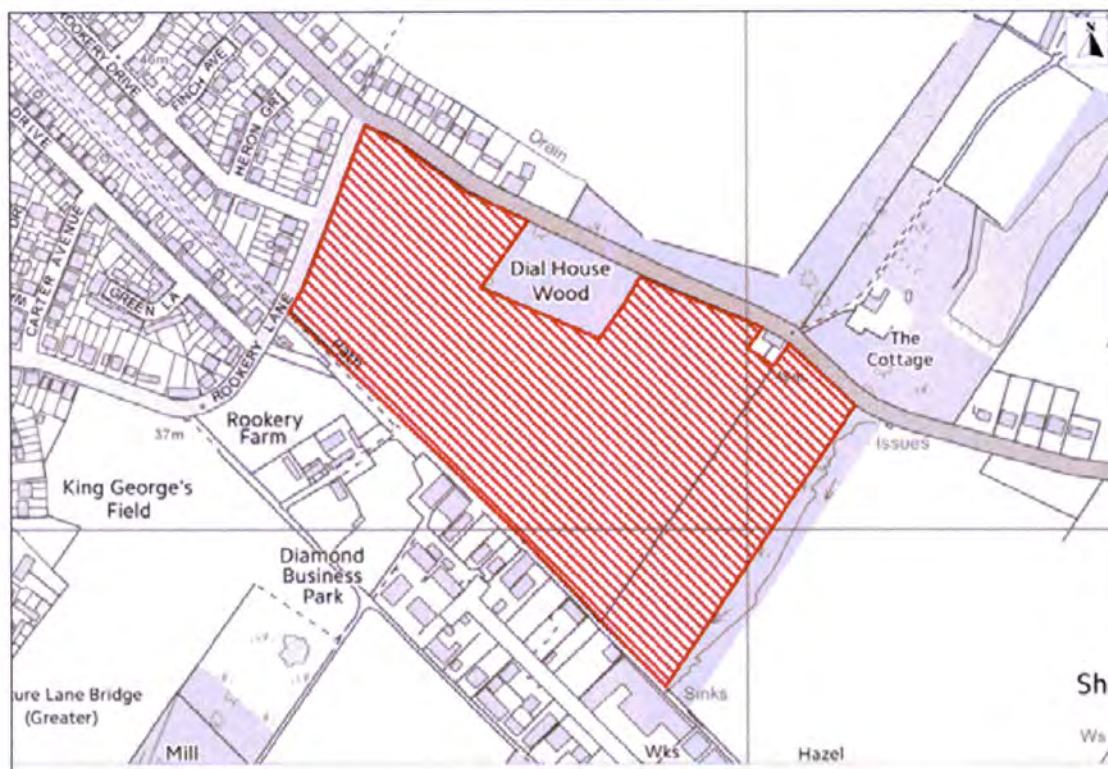


Figure 4.6.1 Site Location

COMMENTS ON THE GREEN BELT REVIEW

Site: GBP_019_A (GB Review) LPSD: 8HA
Land south of Higher Lane and East of Rookery Lane, Rainford
Size: 13.31ha (sub Parcel)

Stage 1B Assessment against Green Belt Purposes: *Low*

The sub-parcel's (019A) role in preventing sprawl and the merger or settlements is limited; and its development would not result in significant countryside encroachment. This sub-parcel is located to the south-east of Rainford and has a high degree of visual containment, with existing housing along its western and part of its northern boundaries, Rainford Industrial Estate to the south, and a line of mature trees to the south east. Highways also run along two of its sides which emphasise the sense of enclosure.

PGLA Comment – Agree with above. However, a number of protected trees exist close to the boundaries of the sub-parcel (within Dial Wood to the north and a linear belt to the south-east). These would require a 20m buffer to be applied to protect them from any development. There would also need to be appropriate landscaping around the sub-parcel to further strengthen the visual buffer between any development and the open countryside.

Stage 2 Allocate, safeguard or discount: *Allocate.*

PGLA Comment – Agree with above. Unlike the Clock Face site this site will require a flood attenuation feature and habitat creation (similar to existing woodland to the south-east of the site) along the south-western boundary with Rainford Linear Park (minimum 25m). Also, existing protected trees within the site should be given due consideration.

04.6 LPSP: 8HA Land south of Higher Lane and east of Rookery Lane, Rainford



Figure 4.6.2. Aerial of Site courtesy of Google Earth



05. SUMMARY & CONCLUSIONS

This report has analysed the sites that SHBC have put forward as being suitable for release from the Green Belt as either allocated sites or safeguarded land within its Borough to provide future residential housing development. The purpose of the comparative exercise was to ascertain whether the Muller site at Land south of Clock Face, north of the M62 should also be allocated for housing or at least be safeguarded for development within future Local Plans.

The Green Belt Review identified the site as providing a low contribution to the three Green Belt purposes, namely unrestricted sprawl, preventing neighbouring towns merging and safeguarding the countryside but was discounted for allocation and safeguarded land due to the assumption that there the physical constraints of the site would not produce a sufficient NDA to make the allocation worthwhile in terms of contribution to the Borough's future housing requirements. This study has considered the identified constraints and demonstrated that a substantial development parcel of at least 5ha can be delivered easily on the site with two access points, and with a density of 30dph the site could deliver 150 new homes. This is a significant potential contribution and if considered correctly would have clearly informed SHBC that the site should have been included for allocation.

The findings of the comparative exercise within this report also demonstrates that the Clock Face site performs as well as, or in most cases, better than the other sites that have been identified as safeguarded land as the majority that have been put forward have greater and significant constraints which include easements on large service pipes and adverse impact on Local Wildlife Sites and overwintering birds.

The findings of this report agreed with the decision for the majority of the allocated sites but suggests that the Clock Face site performs equally as well when considering low contribution to the Green Belt and potential to produce a substantial quantum of housing with no access issues or impacts on environmental features or services. A number of the comparable sites are adjacent to the A580 which forms a natural boundary to the Green Belt consistent with the wording of the NPPF and we suggest that the M62 also provides this function for the Clock Face site.

The conclusion of this report based on the analysis above is that the site should be re-considered by SHBC and put forward as an allocated site within the St. Helens Borough Local Plan 2020 -2035 Submission Draft – Policies Map.

Paul Gray CMLI

March 2019



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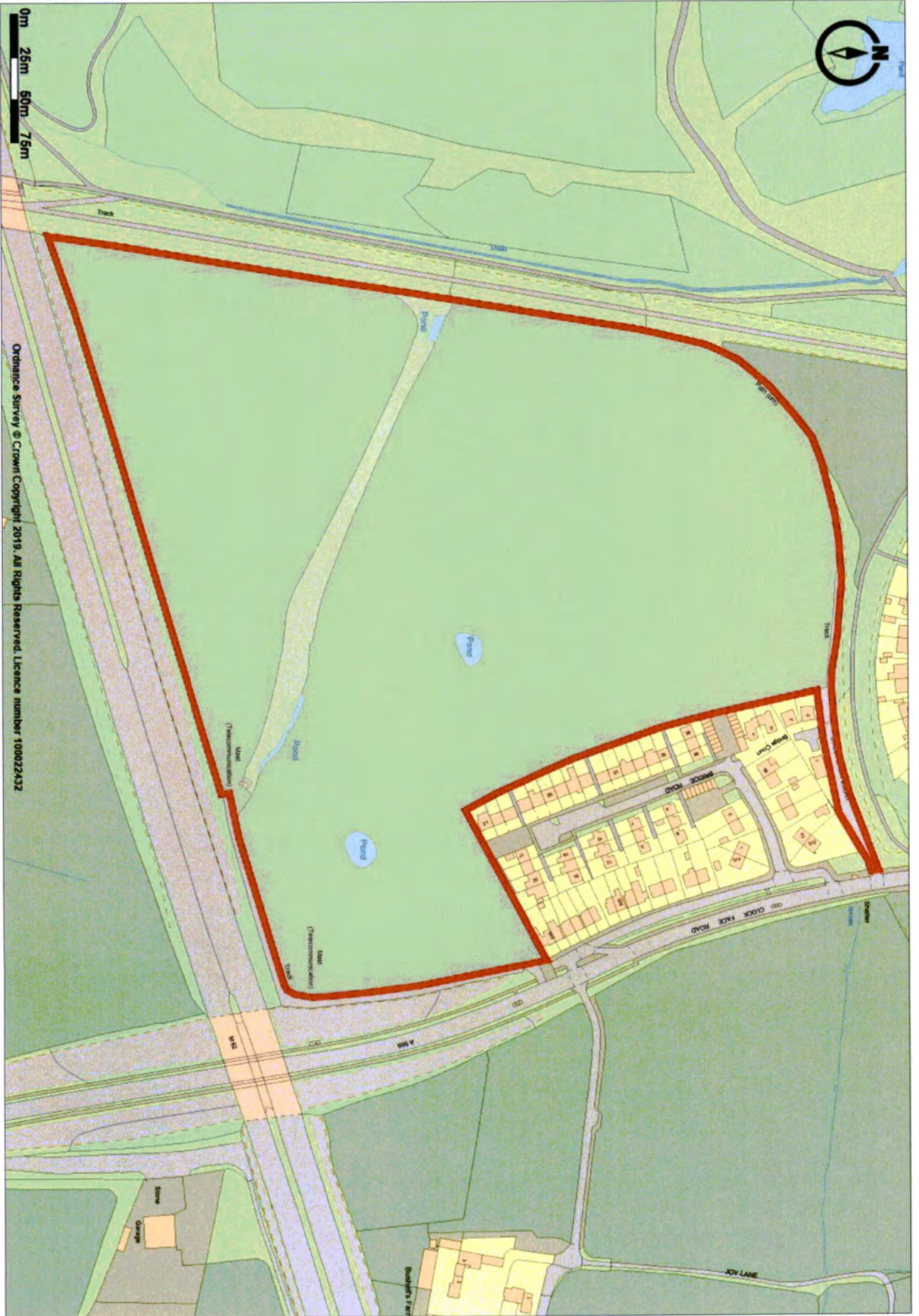
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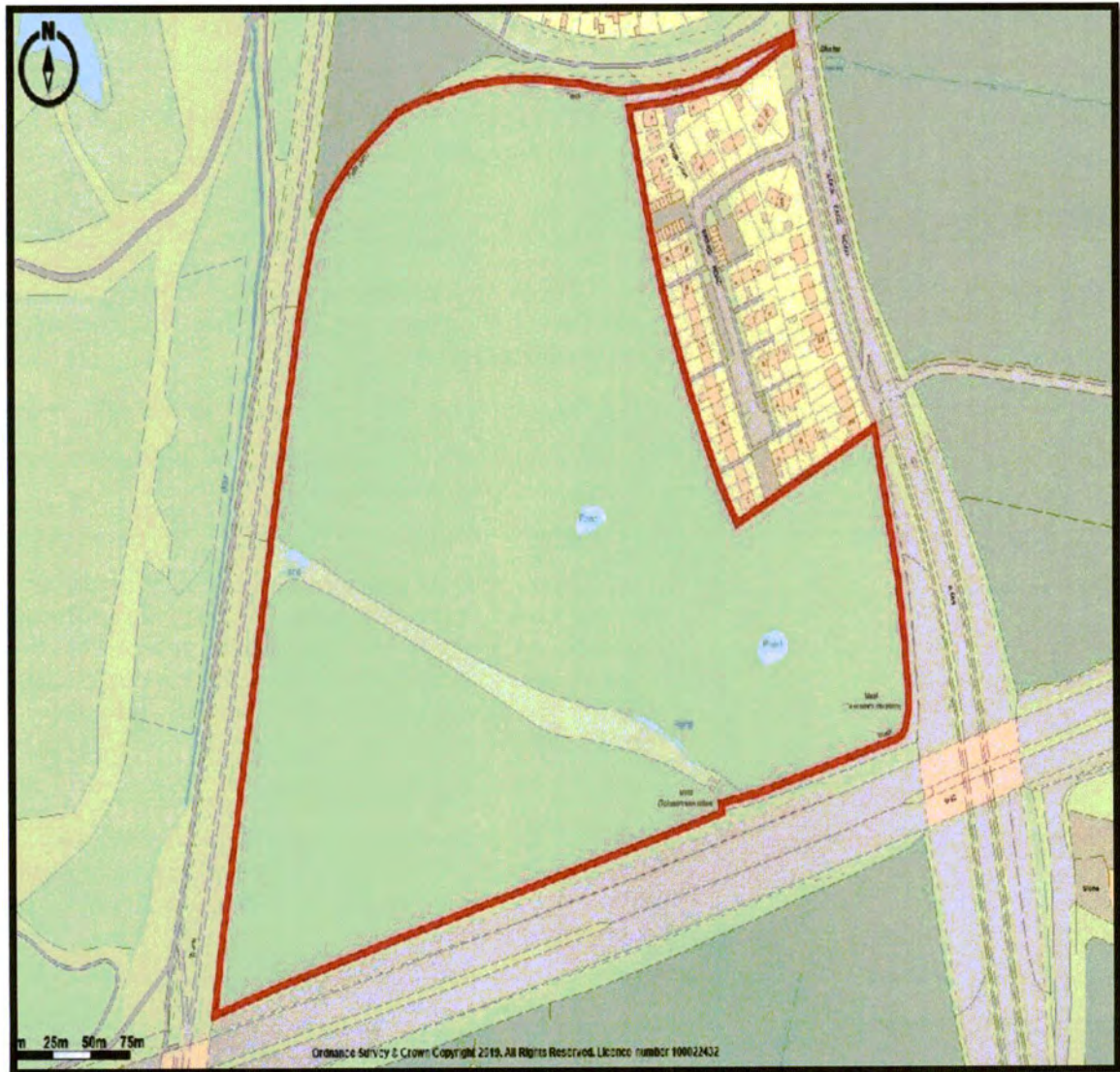
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LANDMARK INFORMATION

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Site Assessment

Land to the south of Clock Face/ north of M62, Clock Face, St Helens, WA9 4UH



Availability	
Size	Approximately 15 hectares
Use	The site is in an agricultural use. It is greenfield and contains no buildings or structures.
Boundaries	Strong boundaries defined by the M62 to the south, a Nature Reserve (Sutton Manor Woodland) to the west, housing and Clock Face Road to the east and housing to the north
Ownership	The land is in the control of Muller Property Group via a Promotion Agreement.
Suitability	
Planning History	The Council's on-line planning data base indicates no planning history for the subject site other than that relating to a telecommunication mast.
Development Plan designation	The site is lies within the designated Green Belt and on the edge of the defined urban area of St Helens.
Highways	A satisfactory and safe vehicular access to the site can be achieved from Clock Face Road to the south of residential properties on Bridge Road and an initial access plan has been prepared. A secondary and / or emergency access can be achieved from Sweet Briar Court. It may also be possible to secure vehicular access to the site via Bridge Road.
Pedestrian and Cycle Access	Pedestrian and cycle access to the site can be achieved from Clock Face Road. It is considered likely that a pedestrian link can be provided from the site to the north to link with existing routes to the district centre.
Access to public transport	<p>There are four bus stops within less than 2 minutes walk of the site to the east (Joy Lane, Northbound and Southbound; and Sweet Briar – Court, Northbound and Southbound). Service 140, provided by Merseytravel Bus Service, stops at all four stops running from St Helens to Rainhill Station.</p> <p>The nearest train station is Lea Green. This is within walking distance of the site. Lea Green's train services provide travel to, and between, Liverpool, Warrington, Crewe and Scarborough.</p> <p>St Helens Central train station can be accessed by bus from Clock Face Road, taking approx. 29 minutes. St Helens Central has regular departures and arrivals from/to Wigan, Liverpool and Blackpool.</p>

Sustainability	<p>The site is considered to be in a sustainable location as it is within an acceptable walking and cycling distance of a range of key services and facilities:</p> <ul style="list-style-type: none"> • Convenience store – 300m • Medical Centre – 1.3km • Dentist – 2.1km • Pharmacy – 1.1km • Library – 1.4km • Post Box – 400m • Primary School – 900m • Secondary School – 3.9km • Railway Station – 2.5km • Public House – 600m • Church – 1km • Recreation ground/ sports pitches – 450m • Park – adjacent to site (Sutton Manor Woodland) • Bus Stop- adjacent to site (Clock Face Road)
Ground conditions	<p>The site is greenfield and therefore is considered unlikely to be contaminated. The site is in a Coal Mining Reporting Area but no mine entries have been identified on the site.</p>
Flood Risk	<p>The site is in Flood Risk Zone 1 and at low risk of flooding.</p>
Ecology	<p>No Ecological Assessment has yet been undertaken. The site has the potential to support wildlife and thus needs to be surveyed. However, it is considered unlikely that ecology represents an insurmountable constraint to the development of the site.</p>
Heritage	<p>The site contains no listed buildings and is not in close proximity of any. It is not in a Conservation Area and the site is not known to be of any archaeological value.</p>
Open Space	<p>The site is not identified or used as public open space.</p>
Infrastructure	<p>Achieving utilities connections is not considered likely to be an issue.</p> <p>A sewage pumping main runs from east to west in the north of the site. There is also a possible water main in the south east of the site however this runs along the site boundaries. It is considered that a layout could be designed around these water mains or that they could be diverted.</p> <p>An electricity gable runs underground in the east of the site.</p> <p>There is an existing telecoms mast within the site which would need to be removed.</p>

Hazardous Installations	There are no hazardous installations or gas pipelines in close proximity of the site and it is not within a HSE consultation zone.
TPO/ Hedges	<p>There are two tree groups within the site and a line of trees / hedgerow running east/west.</p> <p>The boundaries of the site to the motorway, the adjacent nature reserve and Clock Face Road are defined by mature trees and hedgerows which provide the site with good quality natural screening.</p> <p>None of the trees on the site are protected by a Tree preservation Order.</p>
Neighbouring Land Uses	The site directly abuts the building up area of Clock Face and lies to the south of existing residential development. The site is directly to the north of the M62 motorway and to the east is Clock Face Road beyond which is farmland. To the west is a local nature reserve.
Landscape	The site is not considered to be of any high landscape value and development of the site would not have an unacceptable landscape and visual impact having regard to adjacent uses and existing landscaping.
Agricultural Land	To our knowledge the site does not comprise the best most versatile agricultural land.
Minerals	The site is not within a Minerals Safeguarding Area.
Air Quality	The site is not in an Air Quality Management Zone
Noise	Although the site is close to the M62 motorway, it is considered that any noise from traffic on the motorway can be dealt in the layout of the site in terms of the siting of dwellings and landscape buffer zones, together with the design of the dwellings. Noise is not therefore considered to be an insurmountable constraint. Indeed, it is common place to see residential sites on land adjacent to motorways.
Viability	
	It is considered that a viable housing scheme is achievable on the site having regard to the values that are likely to be achieved and policy requirements in terms of open space and affordable housing.

Timescales/ Deliverability	
	<p>It is considered realistic that some new housing could be provided on the site subject to obtaining planning permission within 2 -3 years.</p> <p>It is considered that the site could deliver circa 150 units of a mix of housing types and sizes.</p>