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

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REPRESENTATIONS (REGULATION 22 (1) (D))
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REPRESENTATION ORDER

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St Helens Local Plan Submission Draft - strategic representations on behalf of

Wainhomes NW

Nick Scott

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:16



① - GENERAL

② - LPA05

③ - LPC02

④ - LPA05.1

ns.gov.uk>

⑤ - LPA06

⑥ - LPC01 - CRITERIA 1

⑦ - LPC01 - CRITERIA 2

⑧ - LPC01 - CRITERIA 3

⑨ - LPC13

⑩ - LPA05 - TABLE 4.6

1 Attachment



Representations - St Helens LP Reg 19 - Wainhomes combined.pdf

Dear Sir / Madam,

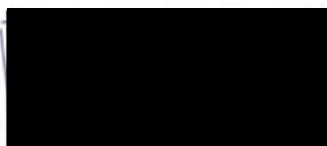
Please find attached, strategic written representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan.

We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

Nick Scott
Assistant Consultant



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Representations to the Submission Draft

St Helens Local Plan – Regulation 19

for Wainhomes (North West) Ltd

Emery Planning project number: 17-005



Project : 17-005
Plan : St Helens Local Plan
Client : Wainhomes (North West)
Ltd

Date : March 2019
Author : John Coxon

Approved by : Stephen Harris

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1. Introduction

1.1 Emery Planning is instructed by Wainhomes (North West) Ltd (hereafter referred to as 'Wainhomes') to make representations to the St Helens Local Plan: Submission Draft. Wainhomes is promoting three sites for residential development: ✓

- Land south-east of Lords Fold, Rainford (ref: HA14)
- Land off Winwick Road, Newton-le Willows (ref: HS17) ✓
- Land off Camp Road & Strong Road, Garswood (ref: HS01)

1.2 Representations specifically in relation to the above sites are submitted under separate cover.

1.3 We have very significant concerns in relation to the proposed plan period, housing requirement and housing land supply. In particular we consider that the anticipated supply from SHLAA sites during the plan period has been significantly over-estimated. We also consider that insufficient allocations have been identified to meet the housing requirement. In our view a much higher flexibility allowance is required, to provide a reasonable prospect of the housing requirement being met. 4

1.4 Therefore to boost significantly the supply of housing land, we consider that additional allocations are required. This would provide a reasonable prospect of the requirement being met. We do not consider that the plan should be submitted for examination until these fundamental issues of soundness have been resolved. 2

1.5 The land south-east of Lords Fold, Rainford was previously proposed as an allocation for residential development in the Preferred Options consultation. The land off Winwick Road, Newton-le Willows and the land off Camp Road & Strong Road, Garswood were proposed as safeguarded land. However in the Submission Draft, only the land off Winwick Road, Newton-le Willows is proposed as safeguarded land. The other two sites would be retained as Green Belt. 2

1.6 We consider that the above sites represent logical allocations, which are capable of delivering sustainable development to meet the identified shortfall in housing land. Their sustainable credentials are reflected in the previous Preferred Options Draft, which proposed the sites for release from the Green Belt. We therefore propose that they are allocated for residential development, in order to meet the shortfall in housing land supply and flexibility that we have identified. ✓

2. National Planning Policy and Guidance

National Planning Policy Framework

- 2.1 The revised Framework was published in February 2019. It sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development. The Framework, taken as a whole, constitutes the Government's view of what sustainable development in England means in practice for the planning system. ✓
- 2.2 Paragraph 11 requires plans and decisions to apply a presumption in favour of sustainable development. For plan-making this means that: ✓
- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; ✓
 - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: ✓
 - i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ✓
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. ✓
- 2.3 Paragraph 35 provides the following in relation to soundness: ✓
- 35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are: ✓*
- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs [19]; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; ✓*

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

19. Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of this Framework.

National Planning Practice Guidance (PPG)

- 2.4 The PPG was launched in March 2014. It replaced a number of practice guidance documents that were deleted when the PPG was published. Local Plan making is addressed under Section 12.

3. Plan period

3.1 The Submission Draft proposes a plan period of 2020-2035. The base date is 1 April 2020.

3.2 Paragraph 20 of the Framework makes clear that strategic policies are those which make provision for housing, employment and other types of growth:

"Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."

3.3 Paragraph 22 of the Framework requires strategic policies to cover a 15 year plan period from adoption:

"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure."

3.4 The plan will not be adopted before 1 April 2020. The Council's Local Development Scheme (December 2018) anticipates adoption in mid-2020. Assuming this is correct the plan period would need to be extended to 2036.

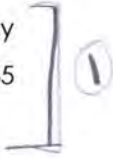
3.5 However even an adoption date of mid-2020 may be optimistic, as the examination may take significantly longer than planned for in the Local Development Scheme. It is not uncommon for examinations to last for at least 2 years. For example, the Cheshire East Local Plan Strategy was submitted in May 2014. The plan was not adopted until July 2017, more than 3 years after submission. Other examples of significantly extended examinations include the Local Plans for Bath and North East Somerset, Wiltshire, Cambridge and South Cambridgeshire, all of which took much longer than 2 years between submission and adoption.

3.6 This is particularly relevant in the case of St Helens given the significant issues of soundness that we have identified in relation to housing provision, which necessitate main modifications and the allocation of additional sites. In that context it would be prudent to extend the plan period to at least 2037.


3.7 Furthermore, St Helens forms part of the Liverpool City Region. As the Council will be aware, West Lancashire is currently preparing an emerging Local Plan. That emerging plan covers a plan period to 2050, and makes provision for meeting the unmet needs from elsewhere within the City Region. In our view St Helens should take a similar approach and also plan ahead to 2050, to provide consistency for the long term planning and growth of the City Region.

4. Policy LPA05: Housing requirement


Plan period

- 4.1 We refer to our comments in Section 2 above. The housing requirement is a strategic policy which must look ahead over a minimum 15 year period from adoption. A plan period to 2035 would not provide the minimum 15 year period. 


Housing requirement


- 4.2 Policy LPA05 sets a minimum housing 9,234 net additional dwellings for the period 2020-2035, at a rate of 486 dwellings per annum (dpa). 

- 4.3 Paragraph 60 of the Framework provides:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." 

- 4.4 Local Housing Need is defined in Annex 2 of the Framework:

"The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework)." 

- 4.5 The application of the standard methodology for St Helens results in a minimum local housing need of 468dpa. However the Council has chosen to identify a higher figure on the basis of an alternative approach. Paragraph 4.18.5 of the Submission Draft explains that the standard method does not take into account the increased employment growth that is likely to result from the development of the sites that are allocated for employment development, which is likely to lead to increased housing need. It is furthermore recognised that the long term trend of declining affordability is likely, if continued in the future, to present an upward pressure on the outputs of the standard method. 

- 4.6 The wider context is that using data published in September 2017 as part of the *Planning for the right homes in the right places* consultation, the standard method would, in aggregate, plan for around 266,000 homes across England. Furthermore this figure (266,000) was based on the household projection data for the period 2016 to 2026. We calculate that the household growth based on the projections between 2019 to 2029 (i.e. the 'current year', as applied by St Helens in its calculation of the standard method) are approximately 3% lower nationally than for the period 2016 to 2026. Therefore the gap to 'bridge' to meet the Government's target of 300,000 homes annually is actually even greater than the gap of 34,000 homes per annum previously identified. ✓
- 4.7 As the Government explained in the technical consultation on updates to national planning policy and guidance (October 2018), the Government expects the gap to be bridged by ambitious authorities going above their local housing need, including through housing deals with the Government. ✓
- 4.8 Paragraph 2a-010 of the NPPG provides guidance :

"When might it be appropriate to plan for a higher housing need figure than the standard method indicates?"

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It 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."

4.9 The circumstances in St Helens provide clear justification for the application of an alternative method in accordance with the Framework and paragraph 2a-010 the NPPG. These are as follows:

- There is a growth strategy in the area in the form of the Liverpool City Region Growth Deal, which provides funding to promote and facilitate additional growth.
- The housing growth associated with projected employment growth is likely to significantly exceed that set out in the standard method. This employment growth is linked to strategic infrastructure improvements that are likely to drive an increase in the homes needed locally, for example the growth of the Liverpool SuperPort and a future Strategic Rail Freight Interchange (SRFI) at the former Parkside Colliery. The projected employment growth associated with these developments is set out within the Council's Employment Land Needs Study (ELNS) Addendum Report (2017), and is underpinned by the Liverpool City Region Growth Deal.
- The housing requirement in the adopted Core Strategy (570dpa) is significantly higher than the minimum housing need figure produced by the standard method, and furthermore significantly higher completion figures have been achieved in the past (pre-recession).

4.10 Having established that an alternative approach should be applied, paragraph 2a-015 of the NPPG provides the following in relation to how such an approach would be tested at examination:

"If authorities use a different method how will this be tested at examination?"

Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market

signals, the approach can be considered sound as it will have exceeded the minimum starting point."

4.11 It is not simply the case, therefore, that a figure higher than the minimum starting point will be considered sound. It is necessary to demonstrate that the alternative method adequately reflects current and future demographic trends and market signals.

4.12 We therefore now turn to the alternative method applied by the Council, as set out in the SHMA Update (January 2019).

Demographic baseline including the shortfall

4.13 The Submission Draft correctly refers to the standard methodology resulting in a figure of 468dpa when a 'current year' of 2019 is applied. However, the Council's alternative method applies a base date of 2016. This reflects the evidence base in relation to economic growth, specifically the ELNS.

4.14 As an alternative approach is used, past under delivery must be taken into account in accordance with paragraph 2a-011 of the NPPG. The base date must also align with the evidence.

4.15 The Council's assessment of its housing need under the alternative method (486dpa) is actually substantially less than the standard method based on a 'current year' of 2016, which would be 515dpa. This is calculated in the table below:

A	Projected household growth 2016-2026 ¹	4,685 (468.5 per annum)
B	Adjustment factor ²	109.94%
C	Minimum local housing need	515dpa

4.16 Turning therefore to whether the alternative method adequately reflects current and future demographic trends and market signals, including any past shortfall, on a 2016 base date it clearly does not. The standard method with a 2016 base date results in a minimum local housing need figure of **515dpa**, which we consider should be the minimum starting point before any adjustment for employment growth is considered.

¹ 2014-based household projections

² Derived from 2017 affordability ratio from ONS

- 4.17 The difference in the figures produced by the standard method (468dpa vs 515dpa) can be explained by higher levels of demographic growth in the earlier years of the projections. As described above, this is a trend seen nationally which could further undermine the prospects of achieving the Government's target of achieving 300,000 homes annually. However the differences are particularly profound in St Helens and this provides further strong justification for the application of an alternative method which captures this projected growth from 2016. ✓

Liverpool City Region Growth Deal

- 4.18 St Helens is part of the Liverpool City Region, which has a Growth Deal with the Government. A copy of the growth deal is appended at **EP1**. The following summary is provided on the first page of the document:

"The Liverpool City Region has secured £232.3m from the Government's Local Growth Fund to support economic growth in the area – with £35m of new funding confirmed for 2015/16 and £153.2m from 2016/17 to 2021. This includes:

- *as part of the Government's ongoing commitment to the Liverpool City Region an indicative award of a further £153.2m of funding over the years to 2020/21.*
 - *£39.9m of funding which the Government has previously committed as part of Local Growth Deal funding to the area*
 - *£4.2m of previously committed Regional Growth Fund*
- ✓

This substantial investment from Government will bring forward at least £30m of additional investment from local partners and the private sector. Combined together this will create a total new investment package of £262.3m for the Liverpool City Region LEP"

- 4.19 The Growth Deal document states that by 2021, the deal will allow at least 10,000 jobs and allow 10,000 homes to be built in the City Region. ✓
- 4.20 It should be noted that St Helens Council will benefit significantly from the Growth Deal. For example, the new transport interchange has recently opened at Newton-le-Willows. The £18.95m scheme was funded by the Local Growth Fund and Merseytravel. The delivery of the Transport Interchange is linked to the proposals to develop the derelict Parkside colliery site, which in turn will deliver 1000's of jobs in St Helens. Jobs growth in St Helens will also be significantly boosted by regional projects such as the Liverpool SuperPort. ✓

4.21 In view of the Government's stated expectation that authorities with Growth Deals will go above their minimum local housing need under the standard method, it should be viewed as extremely disappointing that the Council has decided to pursue a requirement which is significantly lower than the Preferred Options draft and the adopted Core Strategy requirement (570dpa). In our view the Council's approach is directly contrary to the Government's objective of boosting significantly the supply of housing land.

Alignment with employment growth

4.22 In accordance with paragraph 2a-015 of the NPPG, the alternative method must adequately reflect current and future demographic trends and market signals. The basis for the alternative method is to align housing growth with the plan's projected employment growth. However the figure chosen (486dpa) would not achieve this alignment and therefore does not adequately reflect future demographic trends.

4.23 The figure of 486dpa derives from Scenario 2, Option 3 in the SHMA Update (Table 10). Option 3 is based upon removing 2 key sites from the projected employment growth³:

- Omega South (EA18)
- Land North East of Junction 23 M6, Haydock (EA4)

4.24 Firstly, we consider that the phasing set out in Scenario 2 is too pessimistic. For example, the Parkside SRFI project is reasonably well advanced. The owners' website indicates that they intend to submit a planning application shortly, with development to commence within 18 months⁴. Furthermore the £18.95m Transport Interchange at Newton le Willows has already opened, funded by the Local Growth Fund and Merseytravel. Consequently current progress appears to be fundamentally at odds with Scenario 2, which does not anticipate any jobs to be created until 2028 and approximately 50% of the total jobs to be delivered by 2033. It also raises the question as to whether sites should be allocated in the plan if the Council considers that they are going to deliver in part only, and towards the very end of the plan period.

4.25 Secondly, the ELNS looks at a period to 2033. However as we have pointed out elsewhere within our representations, the plan period needs to be a minimum of 15 years from adoption, with an end date of at least 2036 required assuming a smooth examination (at least 2037 is

³ SHMA Update (January 2019), Table 8

⁴ <http://www.thisisparkside.co.uk/planning-timetable/>

recommended). Therefore under Scenario 2 the majority of jobs growth is anticipated to occur by the end of the plan period.

4.26 Thirdly, Option 3 is not considered robust. Whilst the Omega site may be allocated to meet the employment needs of Warrington, it would lie within the administrative area of St Helens and unquestionably would affect future demographic trends by increasing net in migration and the need for housing. Furthermore whilst the land north-east of Junction 23, Haydock is not proposed as an allocation in this plan, there is an undetermined planning application for the development of the site (LPA ref: P/2017/0254/OUP). Given that the application is contrary to current policy, it is unclear why it has not yet been refused. The reasoning for discounting the site as an allocation (highways) appears to have been addressed through information provided by the applicant through the application. It therefore appears that a prospect remains that the site may come forward during the plan period.

4.27 Fourthly, we have concerns in relation to a number of the demographic assumptions applied in the SHMA Update and the ELNS:

- A 2.7% discount is applied to the jobs growth figures to allow for double jobbing. However the 2.7% figure is taken from the Annual Population Survey, and is not considered to be directly applicable to the full time jobs created through the employment allocations in the emerging plan. In our view no such discount should be made.
- An adjustment has been made to economic activity rates. In our view this is not justified. The evidence base should recognise that there are regional differences in economic activity rates and the assumption made is entirely arbitrary. In any event the explanation provided at paragraph 8.25 of the SHELMA relates primarily to Liverpool and Knowsley, not St Helens. Paragraph 4.12 of the SHMA Update also recognises that unemployment in St Helens is already low and further significant improvements are unlikely.
- The commuting assumptions in the ELNS are not consistent with the SHELMA, and do not reflect the 2011 Census data. Any adjustment to these ratios would necessitate consideration of the cross-boundary implications, which have not been assessed.

4.28 To conclude, the SHMA Update concludes that Economic Scenario 2 results in a need for 514dpa. Such a requirement would align with the demographic baseline when a 2016 base-date is applied. However this may actually significantly underestimate need in light of the concerns we have outlined above in relation to the demographic assumptions applied in the SHMA Update and the ELNS.

Market signals and affordable housing

4.29 The Council previously assessed its need at the Preferred Options stage, and determined that a continued requirement of 570dpa was necessary in order to continue stabilising and increasing the population, allow for more housing choice and competition so more households can afford to form, allow for significant economic growth and to reflect the high levels of housebuilding achieved in years before and after the 2008-2009 recession. This was higher than the OAN identified through the Mid Mersey SHMA, which was 461dpa. No justification is provided for now pursuing an alternative approach which fails to address these issues.

4.30 Furthermore there is no uplift from the minimum local housing need to meet affordable housing needs. Paragraph 2a-024 of the NPPG states:

"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."

4.31 The SHMA Update identifies a need for 117 net additional affordable houses per annum, which represents 24% of the overall requirement as proposed. The Council does not appear to have undertaken any assessment as to whether this level of affordable housing can realistically be achieved.

4.32 Policy LPC02 sets a site size threshold of 11 units, with varying rates for affordable housing dependent upon whether a site is brownfield and the zone it is located within. Sites within Affordable Housing Zone 1 are exempt from providing affordable housing. Brownfield sites within Zone 3 are only required to provide 10% affordable housing. There are also a number of large sites such as Cowley Hill (Site 6HA, 816 units) and Moss Nook (Site 10HA, 802 units) that already benefit from planning permission, with no affordable housing provided on the basis of viability.

4.33 It is therefore apparent that a very significant portion of the Council's supply will provide less than 30% affordable housing (or indeed none at all), and the Council's identified need for

affordable housing will not be met. Under such circumstances the Council should have considered an increase in the housing requirement in accordance with the NPPG. ③

Allowance for demolitions / clearance

- 4.34 The Council's Preferred Options Draft (paragraph 4.102) identified a need to take account of demolitions in the order of 29 per annum:

"The loss of dwellings to demolitions and changes of use has averaged 26 dwellings per year over the ten year period 2006/07 to 2015/16, discount an abnormally high year (201 in 2008/09 resulting from housing clearances) and an abnormally low year (2 in 2009/10). The Council considers this to be a suitable indicator of future losses, and so in addition to the 20% uplift, a further requirement of 29 per annum is added to accommodate the demolitions and round the figure up to 570 dwellings per annum." ✓

- 4.35 Demolitions in the order of 29 per annum over a 15 year plan period would amount to 435 dwellings. The figure is not insignificant. Paragraph 4.18.9 of the Submission Draft correctly identifies that the requirement is a net figure. However unlike the Preferred Options, no allowance has been made for demolitions in this plan either in the housing requirement or the identified supply. ✓

Conclusions on the proposed housing requirement

- 4.36 The application of the standard methodology for St Helens results in a minimum local housing need of 468dpa. However the Council has chosen to identify a higher figure on the basis of an alternative approach. The application of an alternative approach is justified by the evidence. However, on determining that an alternative approach is justified, it is necessary to demonstrate that the alternative method adequately reflects current and future demographic trends and market signals. In our view the assessment of need undertaken by the Council does not fulfil this requirement for a number of reasons: ✓

- The Council is part of the Liverpool City Region Growth Deal which provides funding to drive economic growth. The Government expects such authorities to go above minimum local housing need as identified under the standard method to bridge the gap between the standard method figure of 266,000 homes nationally (based upon St Helens delivering 505dpa) and the target of 300,000. ✓

- The plan applies a 2016-base date. However if a 2016-base date is applied then the standard method results in a figure of 515dpa. ✓
- The proposed requirement would not align economic and housing growth. The SHMA identifies a housing OAN of 514dpa. The figure of 486dpa cannot be justified as it does not adequately reflect current and future demographic trends. Furthermore a number of the Council's demographic assumptions are unrealistic, serving to underestimate the need for housing. ✓
- The Council has not considered whether uplifting the requirement for affordable housing could assist in meeting the identified affordable housing need, in accordance with the NPPG. ✓
- No allowance for clearance is made in the requirement or the supply. In the Preferred Options Draft an allowance of 29dpa was made in the requirement. ✓

4.37 In our view the Council's approach does not accord with national planning policy and guidance, and is directly contrary to the Government's objective of boosting significantly the supply of housing land. ✓

5. Policy LPA05: Housing land supply and trajectory

5.1 Policy LPA05: "Meeting St Helens Borough's Housing Needs" is not sound for the following reasons as set out in paragraph 35 of the NPPF:

a) It has not been positively prepared

5.2 The policy does not provide a sound strategy for meeting the area's objectively assessed needs. This is because it essentially relies on large, non-allocated sites which have been identified in the Strategic Housing Land Availability Assessment (SHLAA) on coming forward. Some of these SHLAA sites were allocated for residential development in the Unitary Development Plan (UDP), which was adopted over 20 years ago in July 1998 and others had planning permission for residential development, which has since expired. Despite this, the Council relies on these sites delivering housing in the plan period but does not propose to allocate these sites. Given their history, there is no certainty that these sites will come forward and as a result the plan does not provide a sound plan-led strategy for ensuring that the minimum housing needs will be met.

b) It is not justified

5.3 The policy does not provide an appropriate strategy compared to the reasonable alternative of allocating additional deliverable housing sites for development. The policy is not supported by up to date evidence. The latest SHLAA has a base date of 1st April 2017 and was produced under the previous NPPF and PPG. It is out of date.

d) It is not consistent with national policy

5.4 The policy fails to bring sufficient land forward at a sufficient rate to address objectively assessed needs over the plan period, which is contrary to paragraphs 20(a), 23 and 67 of the NPPF.

5.5 The policy also fails to identify a five year supply of deliverable housing land, which accords with the revised definition of deliverable as set out in the revised NPPF and updated PPG. This is contrary to paragraphs 67 and 73 of the NPPF.

Housing land supply over the plan period 2020 to 2035

Components of the supply

- 5.6 Table 4.6 of the Submission Draft (page 45) seeks to demonstrate how the housing requirement of 486 dwellings per annum to 31st March 2035 will be achieved. ✓
- 5.7 Whilst the plan period is 2020 to 2035, policy LPA05 sets out a housing requirement of 9,234 net dwellings over the period 1st April 2016 to 31st March 2035. This is set out in row a) of table 4.6 and is based on 486 dwellings per annum.

Completions 2016-20

- 5.8 Row b) of table 4.6 then states that the expected number of housing completions between 1st April 2016 and 31st March 2020 is 1,989 dwellings. The Housing Delivery Test (HDT) results confirm that 518 dwellings were completed in 2016/17. This means that 1,471 dwellings are expected to be delivered between 1st April 2017 and 31st March 2020, which is confirmed in the 2017 SHLAA as follows: ✓

Year	2017-18	2018-19	2019-20	Total
Large sites	286	316	592	1,194
Small site allowance	93	93	93	279
Total	379	409	685	1,473

Residual requirement

- 5.9 Row c) of table 4.6 then states that the residual requirement over the local plan period is 7,245 dwellings (i.e. 9,234 from row a) minus 1,989 from row b) = 7,245) ✓

Housing supply 2020-35

- 5.10 The remainder of table 4.6 then deals with the anticipated supply. It essentially concludes that sites identified in the 2017 SHLAA and small sites have a deliverable / developable capacity of 5,550 dwellings over the plan period 2020 to 2035 and therefore in order to meet the 7,245 dwelling requirement, sites with a capacity of 2,034 dwellings need to be released from the Green Belt. On this basis, if 5,550 dwellings do not come forward on the SHLAA sites and small ✓

sites then further land needs to be released from the Green Belt to meet housing needs, even if the Council's proposed housing requirement is found sound.

5.11 Our understanding is that the 5,550 dwelling figure set out in row m) of table 4.6 of the Submission Draft includes the following sources of supply set out in the table below:

Row in table 4.6	Source	Total	Expected completions 2017-20	Total	Total following non-delivery reduction
f)	Large sites with planning permission but not under construction at 1 st April 2017	1,581	500	1,081	988
g)	Large sites under construction at 1 st April 2017	654	524	130	124
h)	Large stalled sites at 1 st April 2017	289	0	289	246
i)	Large SHLAA sites without planning permission at 1 st April 2017	3,763	170	3,593	3,097
j)	Small sites / windfall allowance	1,395	279	1,116	977
-	Additional allowance for 2032 to 2035	135	0	135	115
	Total	7,817	1,473	6,344	5,550

5.12 We discuss each component below.

Row f) Large sites with planning permission but were not under construction at 1st April 2017

5.13 Table 4.6 of the Submission Draft states that there are 1,581 dwellings on large sites that had planning permission at 1st April 2017 but were not under construction. Figure 4.3 of the SHLAA (page 23) then explains that 958 dwellings are considered deliverable between 1st April 2017 and 31st March 2022 and 623 dwellings are developable between 1st April 2022 and 31st March 2027. The trajectory set out in appendix 5 of the SHLAA reveals that there are 20 large sites which fall within this category.

5.14 Because the plan period starts at 1st April 2020, the number of dwellings, which are expected to be completed on these sites between the base date of the SHLAA at 1st April 2017 and 31st March 2020 have been removed. The trajectory set out in appendix 5 of the SHLAA shows that

500 dwellings will be completed over this 3 year period and therefore 1,081 dwellings could be delivered on these sites over the plan period (i.e. $1,581 - 500 = 1,081$).

5.15 The Council then applies a 15% discount to the 623 dwellings that are due to be completed on these sites in years 6-18, which results in a deduction of 93 dwellings. ✓

5.16 We make the following adjustments to the sites in this category for the following reasons:

HL443 – Land off Lowfield Lane (Capacity = 114 dwellings)

5.17 At the time of the 2017 SHLAA, the site had planning permission for 114 dwellings. It is being developed by Morris Homes. Following a number of applications and approvals to amend the plans by substituting various plots, 104 dwellings will now be developed at this site and therefore **10 dwellings** should be removed from the supply.

HL471/ 3HA – Penlake Industrial Estate (Capacity = 358 dwellings)

5.18 The site is to be allocated in the plan (ref: 3HA) and Countryside Homes will develop the site.

5.19 The site had outline planning permission for up to 358 dwellings (LPA ref: P/2015/0130). However, the details approved at the reserved matters are for 337 dwellings (LPA ref: P/2018/0251). Therefore, **21 dwellings** should be removed from the supply. ✓

HL526 – Former Broadoak Social Club, Boardmans Lane, St Helens (Capacity = 21 dwellings)

5.20 At the time of the 2017 SHLAA, the site had outline planning permission for 21 dwellings. It now has full planning permission for 24 dwellings (LPA ref: P/2018/0287). Therefore, **3 dwellings** should be added. ✓

HL531 – Land at Mere Grange, Lowfield Lane (Capacity = 98 dwellings)

5.21 At the time of the 2017 SHLAA, the site only had outline planning permission for up to 120 no. dwellings (LPA ref: P/2016/0567). The SHLAA considered that 98 dwellings would be delivered on the site. However, Anwyl Homes has submitted a full planning application for 82 no. dwellings, which is pending determination (LPA ref: P/2018/0849). Therefore, **16 dwellings** should be removed. ✓

5.22 As a result of these amendments, **44 dwellings** should be removed from the supply from this category. ④

5.23 The following two sites only have outline planning permission, which expires this year. Despite this, applications for reserved matters have not been made and therefore there is some doubt as to whether they should be included in the housing land supply. An update on the following sites will be required at the examination hearing sessions:

- HL496 – Land at Elton Head Road, Lea Green (Capacity = 180 dwellings), outline planning permission (ref: P/2015/0309) expires on 29/04/19; and
- HL525 – Fishwicks Industrial Estate (Capacity = 93 dwellings), outline planning permission (ref: P/2016/0299) expires on 15/11/19.

Row g) – Large sites with planning permission under construction as of 1st April 2017

5.24 Table 4.6 of the Submission Draft states that there were 654 dwellings on large sites that had planning permission at 1st April 2017 and were under construction. Figure 4.3 of the SHLAA (page 23) explains that of these 614 dwellings are considered deliverable between 1st April 2017 and 31st March 2022 and 40 dwellings are developable between 1st April 2022 and 31st March 2027. The trajectory set out in appendix 5 of the SHLAA reveals that there are 12 large sites which fall within this category.

5.25 Because the plan period starts at 1st April 2020, the number of dwellings, which are expected to be completed on these sites between the base date of the SHLAA at 1st April 2017 and 31st March 2020 have been removed. The trajectory set out in appendix 5 of the SHLAA shows that 524 dwellings will be completed over this 3 year period and therefore 130 dwellings could be delivered on these sites over the plan period from 2020 (i.e. $654 - 524 = 130$).

5.26 The Council then applies a 15% discount to the 40 dwellings that are due to be completed on these sites in years 6-18, which results in a deduction of 6 dwellings and therefore 124 dwellings in the plan period 2020-35.

5.27 We accept that these sites should be included in the supply.

Row h) – Large sites with planning permission but stalled as of 1st April 2017

5.28 Table 4.6 of the Submission Draft states that there are 289 dwellings on large sites that had planning permission at 1st April 2017 but had stalled. Figure 4.3 of the SHLAA (page 23) explains that all 289 dwellings are considered developable between 1st April 2027 and 31st March 2032. This is also reflected in the trajectory set out in appendix 5 of the SHLAA.

5.29 The Council then applies a 15% discount to the 289 dwellings that are due to be completed on these sites, which results in a deduction of 43 dwellings, meaning the Council relies on 246 dwellings to be delivered on these sites. ✓

5.30 None of these sites should be relied on. Even though these sites had planning permission, there is no reasonable prospect that they can viably be developed as evidenced by the fact they have stalled. They should not be included within the developable supply because they do not meet the definition set out in the Glossary of the NPPF as follows: ✓

"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."

5.31 Therefore **246 dwellings** should be removed from the supply. ✓

Row i) – Large sites identified in the 2017 SHLAA, without planning permission as of 1st April 2017

5.32 Table 4.6 of the Submission Draft states that there are 4,107 dwellings on large sites, which have been identified in the SHLAA but did not have planning permission as of 1st April 2017. It is unclear what the source is for the 4,107 dwellings. The 2017 SHLAA identifies 59 large sites, which it considered were capable of delivering 3,763 dwellings over a 15 year period. This is confirmed in figure 4.3 of the SHLAA, which considers that: ✓

- 484 dwellings are deliverable between 1st April 2017 and 31st March 2022;
- 2,305 dwellings are developable between 1st April 2022 and 31st March 2027; and
- 974 dwellings are developable between 1st April 2027 and 31st March 2032. ✓

5.33 It is also confirmed in the trajectory at appendix 5 of the SHLAA. Therefore, we assume the 4,107 figure is an error and the Council's figure should be 3,763 dwellings. ✓

5.34 Because the plan period starts at 1st April 2020, the number of dwellings, which are expected to be completed on these sites between the base date of the SHLAA at 1st April 2017 and 31st March 2020 need to be removed. The trajectory set out in appendix 5 of the SHLAA shows that 170 dwellings will be completed over this 3 year period and therefore 3,593 dwellings could be delivered on these sites over the plan period (i.e. $3,763 - 170 = 3,593$).

5.35 The Council then applies a 15% discount to the 3,593 dwellings that are due to be completed on these sites, which results in a deduction of 496 dwellings.

5.36 As set out in appendix **EP2**, we have reviewed all 59 sites, which we have split into the following categories:

	Number of sites	SHLAA Capacity
SHLAA sites which now have planning permission or a planning application pending determination	16	811
SHLAA sites which are proposed allocations	3	1,582
SHLAA sites which were allocated in the UDP and have not come forward	5	222
SHLAA sites that had planning permission which has expired	11	275
Other SHLAA sites	24	873
	59	3,763

5.37 We comment as follows.

5.38 Firstly, as above, the majority of SHLAA sites are not proposed to be allocated and do not have planning permission. It is therefore not known whether planning permission would even be granted for residential development on the sites that still do not have permission. Indeed, the SHLAA itself states:

"The inclusion of any site in this assessment does not indicate that it will be allocated or successfully obtain permission for housing".

5.39 Secondly, there is no guarantee that a planning application will even be made on a site identified in the SHLAA. As set out in the table above, 5 of the SHLAA sites were allocated for a combined total of 222 no. dwellings in the UDP over 20 years ago, yet these sites have not delivered any dwellings.

5.40 Thirdly, even if planning permission is granted on a SHLAA site, there is no guarantee that it will be implemented. As set out in the table above, 11 of the SHLAA sites have already had planning permission in the past and that permission was allowed to expire.

5.41 Fourthly, the detail provided in the SHLAA means that many of the sites have problems without any guarantee that they will be overcome, yet the Council relies on these sites to deliver dwellings in the plan period. For example:

Site ref 113: Land at Willow Tree Avenue (capacity = 50 dwellings)

5.42 The SHLAA explains that there are pylons and electric cables running across the site.

Site ref 129: Derbyshire Hill Family Centre (capacity = 12 dwellings)

5.43 The site has no relevant planning history. The SHLAA explains that it is used as a community centre. There is no evidence that this site will even be available. The SHLAA states:

"If this community centre becomes surplus to requirements, it could potentially provide dwellings over the longer term."

Site ref 133: Land rear of 2-24 Massey Street (capacity = 14 dwellings)

5.44 The site has no relevant planning history. The SHLAA explains that the site is located adjacent to industrial uses and there are viability issues in bringing the site forward.

5.45 For these reasons, we consider that unless the SHLAA site has planning permission or is proposed to be allocated in the Local Plan, it should not be included in the supply. This means that 40 of the SHLAA sites with a total capacity of 1,370 dwellings should be removed. Due to the Council already applying a 15% reduction, this means that **1,165 dwellings** should be removed from the supply.

5.46 In addition, three of the SHLAA sites without planning permission at the base date are proposed allocations, which we discuss below:

6HA: Land at Cowley Street, Cowley Hill, Town Centre

5.47 This site is around 31 ha in area and is located to the north of St Helens Town Centre. It is allocated for 816 dwellings of which 540 dwellings are expected to be delivered by 2035. The Council's evidence (SHLAA and the Economic Viability Assessment) assume 60 dwellings per annum will be delivered on the site from 2026.

5.48 Even if it is found to be sound, we question whether the site is deliverable in the plan period. We have identified above sites that have either been allocated in the UDP and not come forward or had planning permission which expired. We note the SHLAA allowed 7 years from 2017 for "significant site preparation", planning permission and demolition. The Economic Viability Assessment report confirms that this site is only viable without providing any affordable housing.

- 5.49 A planning application has still not been made and therefore there has been no progress towards meeting even the ambitious timescales as set out in the SHLAA. The Council has provided no evidence to demonstrate that 60 dwellings per annum would be achieved.
- 5.50 We consider that the site could deliver 315 dwellings in the plan period based on a build rate of 45 dwellings per annum, which the Council has applied to other large sites and the completion of dwellings from 2028, which allows for 7 years from the adoption of the plan. This results in a deduction of **145 dwellings** from the supply as the Council applies a 15% deduction to the 540 dwelling figure, meaning it relies on 460 dwellings being delivered at this site (460 – 315 = 145 dwellings).

9HA: Former Linkway Distribution Park, Elton Head Road, Thatto Heath

- 5.51 This site is 12.5 ha in area. It is a proposed allocation for 350 dwellings. It is included in the 2017 SHLAA for 375 dwellings.
- 5.52 The site has outline planning permission for up to 352 no. dwellings (LPA ref: P/2018/0060/FUL). Again, the Economic Viability Assessment report confirms that this site is only viable without providing any affordable housing.
- 5.53 We accept that this site could be delivered in full in the plan period.

10HA: Moss Nook Urban Village, Watery Lane, Moss Nook, Sutton (capacity = 802 dwellings)

- 5.54 The site is 26.74 ha in area. The proposed allocation is for 802 dwellings, which the Council assumes will all be delivered before the end of the plan period on 31st March 2035. The site is to be delivered at a density of 40 dwellings per hectare.
- 5.55 The Council's evidence is contradictory. The SHLAA assumes a build rate of 80 dwellings per annum and the Economic Viability Assessment assumes a build rate of 60 dwellings per annum.
- 5.56 In terms of suitability, the SHLAA states:

"This site is not close to a train station or high frequency bus route but is otherwise accessible and located in a sustainable location. A large area is identified as Greenway, the land is suspected to be contaminated and may have mineshafts present; there are no other policy or known physical constraints that would make the site unsuitable for housing."

- 5.57 The Economic Viability Assessment report confirms that this site is only viable without providing any affordable housing.
- 5.58 On 18th July 2007, outline planning permission was granted for up to 1,200 dwellings on this site (LPA ref: P/2003/1574), but this permission was not implemented and expired. There is therefore no certainty that this site will come forward even if planning permission is granted.
- 5.59 Nevertheless, a planning application has still not been made and therefore there has been no progress towards meeting even the ambitious timescales as set out in the SHLAA. The Council has provided no evidence to demonstrate that 60 dwellings per annum would be achieved.
- 5.60 Even it is found sound and developable, we consider that the site could deliver 400 dwellings in the plan period based on a build rate of 45 dwellings per annum, which the Council has applied to other large sites. We also consider that the completion of dwellings could be achieved from 2026 which allows for 7 years from now for planning permission to be secured, infrastructure put in place and the ground conditions / mineshafts to be addressed. This results in a deduction of **281 dwellings** from the supply as the Council applies a 15% deduction to the 802 dwelling figure, meaning it relies on 682 dwellings being delivered at this site ($682 - 400 = 281$ dwellings).
- 5.61 Therefore, from all of the SHLAA sites without planning permission, we remove 1,586 dwellings (i.e. $1,165 + 145 + 281 = 1,586$ dwellings).

Row j) – Small sites (below 0.25 ha / 5 units (small sites / "windfall allowance)

- 5.62 Table 4.6 of the Submission Draft explains that 1,395 dwellings will be delivered on small sites in the plan period. This is based on 93 dwellings per annum over 15 years.
- 5.63 Figure 3.12 of the SHLAA (page 18) confirms that there has been an average of 93 dwellings delivered on small sites over the period 2007 to 2018. However, the figures are gross. The net figures have not been provided. We have asked the Council to provide the net figure but have not yet received a response.
- 5.64 The 2017 SHLAA does not set out how many small sites had planning permission at 1st April 2017. Therefore, it is unclear as to how large any windfall allowance should be.

- 5.65 In summary, the submission draft and its associated evidence base fall significantly short of providing the compelling evidence required to justify a windfall allowance as set out in paragraph 70 of the NPPF, which states:

"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area."

- 5.66 Once the Council has provided the evidence, we request an opportunity to comment. Whilst we have included the Council's windfall allowance in our calculation of the supply, because this is a gross figure, it is optimistic.

Additional allowance for 2032 to 2035

- 5.67 As above, table 4.6 of the Local Plan includes an additional allowance of 115 dwellings because the SHLAA only runs to 2032 but the plan period runs to 2035. This again highlights the inadequacy of relying on a 2017 based SHLAA to support the plan. Nevertheless, this allowance does not meet the requirements of paragraph 67b) of the NPPF which requires "specific" developable sites or broad locations to be identified for years 11-15 and therefore **115 dwellings** should be removed.

Summary in relation to housing supply from sites identified in the SHLAA

- 5.68 In summary, the Council considers that 5,550 dwellings should be considered developable on sites identified in the SHLAA. It uses this figure to then calculate how much land needs to be released from the Green Belt to meet the remaining requirement. However, we consider that the 5,550 dwelling figure is unrealistic and in particular reliance cannot be made on SHLAA sites without planning permission. In some cases, these sites have either been allocated in the UDP and / or had planning permission, which has subsequently expired. For the reasons set out above, we consider that around 3,550 dwellings could be considered developable as is summarised in the following table.

Row in table 4.6	Source	Council's position	Emery Planning's position	Difference
f)	Large sites with planning permission but not under construction at 1 st April 2017	988	944	-44
g)	Large sites under construction at 1 st April 2017	124	124	0
h)	Large stalled sites at 1 st April 2017	246	0	-246
i)	Large SHLAA sites without planning permission at 1 st April 2017	3,097	1,511	-1,586
j)	Small sites / windfall allowance	977	977	0
-	Additional allowance for 2032 to 2035	115	0	-115
	Total	5,550	3,556	-1,991

5.69 This assumes that the delivery on small windfall sites will be as the Council claims, whilst as above, the Council has not provided the compelling evidence required.

5.70 In summary, this means that even if the Council's housing requirement is found sound an additional 2,000 dwellings on sites in the Green Belt need to be identified.

Housing Delivery Test

5.71 The definition of the Housing Delivery Test (HDT) is provided in the Glossary to the NPPF on page 67 as follows:

"Housing Delivery Test: Measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November"

5.72 The HDT is measured as a percentage each year. The following implications apply where the HDT results delivery falls below specific thresholds.

5.73 Firstly, as explained in footnote 7 of the NPPF, the tilted balance to the presumption in favour of sustainable development set out in paragraph 11(d) of the NPPF applies where the HDT indicates that the delivery of housing was "substantially below" the housing requirement over the previous years. The transitional arrangements set out in Annex 1 of the NPPF explain that "substantially below" means for the 2018 HDT results below 25%, for the 2019 HDT results below 45% and for the 2020 HDT and beyond below 75%.

- 5.74 Secondly, paragraph 73 and footnote 39 of the NPPF explain that where the HDT result is below 85%, the 20% buffer will apply for purposes of calculating the five year housing land supply.
- 5.75 Thirdly, Paragraph 75 of the NPPF explains that where the HDT result is below 95%, the local planning authority should prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years.
- 5.76 Consequently, given these implications, it is important that the Local Plan ensures that the HDT will be passed each year.
- 5.77 The HDT Measurement Rule Book (July 2018) explains that HDT is calculated as a percentage of net homes delivered against the "number of homes required". However, it then explains that even where the latest adopted housing requirement figure is less than five years old "the number of homes required" means the lower of either the latest adopted housing requirement figure or the minimum annual local housing need figure. The transitional arrangements set out in paragraph 21 of the HDT Measurement Rule Book then explain that for the financial years 2015/16, 2016/17 and 2017/18, the minimum annual local housing need figure is replaced by household projections.
- 5.78 The HDT results for 2018 were published on 19th February 2019. The result for St Helens is summarised in the table below:

	2015-16	2016-17	2017-18	Total
Number of homes required	532	518	454	1,504
Number of homes delivered	575	487	411	1,473
HDT measurement				98%

- 5.79 As can be seen from the above, St Helens delivered 1,473 new homes over the last three years against a "requirement" based on household projections over the same period of 1,504 dwellings. This results in a HDT measurement of 98% and means that whilst the HDT has not been passed, currently the tilted balance set out in paragraph 11(d) of the NPPF is not triggered because of the HDT result, the buffer is not increased to 20% and an action plan is not required. However, the HDT thresholds will need to be met each year going forward and one way of ensuring this will be the case will be for the Council to demonstrate a five year housing land supply, which we now discuss.

Five year housing land supply

5.80 Policy LPA05: "Meeting St Helens Borough's Housing Needs" states that the delivery of new housing development will be monitored annually to ensure that there is a deliverable supply of housing that is sufficient to provide at least 5 years' worth of new housing development against the housing requirement. However, neither the Submission Draft nor any of the supporting documents identify a supply of specific, deliverable sites plus a buffer for years one to five of the plan period i.e. 1st April 2020 to 31st March 2025. This is contrary to the requirements of the NPPF as set out within paragraphs 67a) and 73. ✓

5.81 Whilst we note that section 5 of the 2017 SHLAA (pages 24 to 28) provides calculations in relation to five year housing land supply, this is in relation to:

- Previous national planning policy and guidance;
- A housing requirement set out in the Core Strategy and an untested objectively assessed need (OAN) figure; and
- A five year period of 1st April 2017 to 31st March 2022.

5.82 The five year calculation set out in the SHLAA is therefore out of date and cannot be relied on.

5.83 Once it is submitted, the Local Plan will be examined against the revised NPPF (published February 2019) and updated PPG.

5.84 Paragraph 74 of the NPPF gives the Council the opportunity to demonstrate a confirmed five year supply of specific deliverable sites through the plan examination process. However, paragraph 3-049 of the PPG: "How can local authorities demonstrate that they have a confirmed 5 year land supply as part of the plan examination?" confirms that if the Council chose to do so it needed to indicate that it was seeking to do so at the regulation 19 stage i.e. during the current consultation. This was not the case and therefore the Council's five year supply will not be "confirmed" through the Local Plan examination process. ✓

5.85 Notwithstanding this, the Council will still need to be able to demonstrate a five year housing land supply for the plan to be found sound. Indeed, paragraph 3-038 of the PPG: "When should an authority demonstrate a 5 year housing land supply?" states:

"In principle an authority will need to be able to demonstrate a 5 year land supply at any point to deal with applications and appeals, unless it is choosing

to confirm its 5 year land supply, in which case it need demonstrate it only once per year."

- 5.86 This paragraph of the PPG should be read alongside paragraph 3-028 of the PPG: "What is a 5 year land supply?", which states:

"A 5 year land supply is a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against a housing requirement set out in adopted strategic policies, or against a local housing need figure where appropriate in accordance with paragraph 73 of the National Planning Policy Framework."

- 5.87 As above, the Council has not identified a five year supply, which is contrary to the NPPF and this section of the PPG.

- 5.88 We therefore assume that the Council will produce a five year housing land supply position statement before or during the Local Plan examination. This position statement will be expected to provide all of the information as set out in paragraphs 3-048 and 3-036 of the PPG.

- 5.89 Paragraph 3-048 of the PPG: "What information will annual reviews of 5 year land supply, including annual position statements, need to include?" (our emphasis) states:

"Assessments need to be realistic and made publicly available in an accessible format as soon as they have been completed. Assessments will be expected to include:

- for sites with detailed planning permission, details of numbers of homes under construction and completed each year; and where delivery has either exceeded or not progressed as expected, a commentary indicating the reasons for acceleration or delays to commencement on site or effects on build out rates;*
- for small sites, details of their current planning status and record of completions and homes under construction by site;*
- for sites with outline consent or allocated in adopted plans (or with permission in principle identified on Part 2 of brownfield land registers, and where included in the 5 year housing land supply), information and clear evidence that there will be housing completions on site within 5 years, including current planning status, timescales and progress towards detailed permission;*
- permissions granted for windfall development by year and how this compares with the windfall allowance;*
- details of demolitions and planned demolitions which will have an impact on net completions;*

- total net completions from the plan base date by year (broken down into types of development e.g. affordable housing); and
- the 5 year land supply calculation clearly indicating buffers and shortfalls and the number of years of supply." (our emphasis)

5.90 Paragraph 3-036 of the PPG: "What constitutes a 'deliverable site' in the context of housing policy?" provides further information. It states:

"For sites with outline planning permission, permission in principle, allocated in a development plan or identified on a brownfield register, where clear evidence is required to demonstrate that housing completions will begin on site within 5 years, this evidence may include:

- any progress being made towards the submission of an application;
- any progress with site assessment work; and
- any relevant information about site viability, ownership constraints or infrastructure provision.

For example:

- a statement of common ground between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates.
- a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions."

5.91 The Council has not provided any of the information required by paragraphs 3-036 and 3-048 in the Submission Draft or the evidence base. Once the Council provide the information required either before the plan is submitted or during the course of the examination, we respectfully request the opportunity to comment.

Five year housing requirement

5.92 The five year housing requirement will be five times the annual housing requirement plus buffer. Notwithstanding our objections to the proposed housing requirement elsewhere, the annual requirement proposed in the draft plan is 486 and the 2018 HDT results mean that the 5% buffer applies. Therefore, the five year requirement is currently 2,552 dwellings as summarised in the following table:

	Requirement	
A	Proposed annual housing requirement	486
B	Five year net Local Plan housing requirement (A X 5)	2,430
C	5% Buffer (5% of B)	122
D	Total supply to be demonstrated (B + C)	2,552
E	Annual average (D / 5)	510

Five year housing land supply

What constitutes a 'deliverable' site

- 5.93 The definition of what constitutes a 'deliverable' site has changed significantly since the 2017 SHLAA was published. The revised definition of "deliverable" is set out on page 66 of the NPPF as follows:

"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."

- 5.94 The NPPF does not provide any further detail on the "clear evidence" referred to in paragraph b) above, but further information is set out in paragraphs 3-036 and 3-048 of the PPG as we have described above.
- 5.95 The 2017 SHLAA claimed a five year supply of 2,521 dwellings at 1st April 2017 from the following sources:

	Source	Number of dwellings in the five year supply	Percentage of 5YHLS at 01/04/17
A	Large sites – planning permission under construction	614	24%
B	Large sites – planning permission not started	958	38%
C	Large sites – SHLAA sites	484	19%
D	Small sites – allowance (93 X 5)	465	19%
	Total	2,521	

5.96 The revised definition of deliverable has significant implications for the five year supply in St Helens as we summarise below:

- Large sites – planning permission under construction – these sites meet the definition of deliverable and should be included in the supply unless there is clear evidence that homes will not be delivered in five years.
- Large sites – planning permission not started –
 - sites with full planning permission for major development 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)
 - sites with outline planning permission for major development should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years
- Large SHLAA sites – these do not meet the definition set out in the NPPF and should not be included in the supply. Whilst the previous PPG stated that sites without planning permission which were not allocated in a local plan “may” be included in the five year supply, this is no longer the case.
- Small sites – the 2017 SHLAA does not identify small sites with planning permission. Paragraph 73 of the NPPF requires “specific deliverable sites” to be identified. Therefore the small sites with planning permission must be identified. In terms of the small sites windfall allowance, compelling evidence is required for the inclusion of an allowance under paragraph 70 of the NPPF.

5.97 In summary, contrary to the requirements of the NPPF as set out within paragraphs 67a) and 73, the Council has not demonstrated it has a “deliverable” five year housing land supply. Given the reliance on SHLAA sites as set out in its latest position at 1st April 2017, once the definition has been applied, it is unlikely that the Council will be able to demonstrate a five year housing land supply.

5.98 Notwithstanding this, once the Council provide the information required either before the plan is submitted or during the course of the examination, we respectfully request the opportunity to comment. ✓

6. Policy LPA05.1: Strategic Housing Sites

Site 2HA: Florida Farm (South of A580), Slag Lane, Brackbrook

- 6.1 The Council's viability assessment demonstrates that the site is not viable with the full provision of affordable housing (see Table 6.19 of the Council's Viability Assessment). This is before other policy requirements / S106 contributions (including education). This is a significant issue given that the Council is unlikely to be able to meet its identified needs for affordable housing, as we have identified in our response to Policy LPA05.
- 6.2 In our view other sites which are viable and capable of meeting affordable housing and other necessary contributions should be allocated in preference to this site.

Site 4HA: Bold Forest Garden Suburb

- 6.3 We object to the allocation of this site.
- 6.4 Firstly, the site comprises approximately 133ha. We cannot see the justification for the release of such a large quantum of land from the Green Belt which on the Council's own figures will deliver only 480 dwellings during the plan period (only 16% of the total capacity). The same quantum of development could be achieved from a number of smaller allocations with substantially less Green Belt release. As such the exceptional circumstances necessary for the release of the land from the Green Belt cannot be demonstrated.
- 6.5 Secondly, we would question the deliverability of the site and whether it is viable. The site falls within multiple ownerships. Numerous parcels will be undevelopable, or more difficult to develop than others, indicating that negotiations between the landowners are likely to be extremely difficult and protracted. We also would question its viability. The Council's viability assessment does not appear to factor in all of the strategic infrastructure required (for example the new primary school, local retail centre and potentially health facilities referred to elsewhere within the evidence base).

Site 5HA: Gartons Lane, Bold

- 6.6 The site is not viable with the full provision of affordable housing once other policy requirements / S106 contributions (including education) are factored in (see Table 6.19 of the Council's Viability Assessment).

- 6.7 As per our representations to Site 2HA, other sites which are viable and capable of meeting affordable housing and other necessary contributions should be allocated in preference to this site.

Proposed additional allocations

- 6.8 We have very significant concerns in relation to the proposed plan period, housing requirement and housing land supply. In particular we consider that the anticipated supply from SHLAA sites during the plan period has been significantly over-estimated. We also consider that insufficient allocations have been identified to meet the housing requirement. In our view a much higher flexibility allowance is required, to provide a reasonable prospect of the housing requirement being met.
- 6.9 Therefore to boost significantly the supply of housing land, we consider that additional allocations are required. This would provide a reasonable prospect of the requirement being met. We do not consider that the plan should be submitted for examination until these fundamental issues of soundness have been resolved.
- 6.10 Wainhomes is promoting three sites for residential development:
- Land south-east of Lords Fold, Rainford (ref: HA14)
 - Land off Winwick Road, Newton-le Willows (ref: HS17)
 - Land off Camp Road & Strong Road, Garswood (ref: HS01)
- 6.11 Representations specifically in relation to the above sites are submitted under separate cover.
- 6.12 The land south-east of Lords Fold, Rainford was previously proposed as an allocation for residential development in the Preferred Options consultation. The land off Winwick Road, Newton-le Willows and the land off Camp Road & Strong Road, Garswood were proposed as safeguarded land. However in the Submission Draft, only the land off Winwick Road, Newton-le Willows is proposed as safeguarded land. The other two sites would be retained as Green Belt.
- 6.13 We consider that the above sites represent logical allocations, which are capable of delivering sustainable development to meet the identified shortfall in housing land. Their sustainable credentials are reflected in the previous Preferred Options Draft, which proposed the sites for release from the Green Belt. We therefore propose that they are allocated for residential

development, in order to meet the shortfall in housing land supply and flexibility that we have identified.

7. Policy LPA06: Safeguarded land

7.1 The Council accepts that safeguarded land is required and proposes to designate a number of sites. However we consider that the quantum of safeguarded land provided is inadequate and needs to be increased significantly.] ⑤

7.2 Paragraph 133 of the Framework identifies that the essential characteristics of Green Belts are their openness and their permanence. ✓

7.3 Paragraph 136 requires strategic policies to 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. ✓

7.4 Paragraph 139 states that when defining Green Belt boundaries, plans should (amongst other requirements):

c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period; ✓

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period (our emphasis)

7.5 Therefore national policy is clear on the need ensure that Green Belt boundaries will not need to be altered at the end of the plan period (currently 2035). This is a critical aspect to achieving the intended permanence in the long term. The appropriate mechanism for achieving this is through the provision of a sufficient quantum of safeguarded land. ✓

7.6 How much safeguarded land is needed in practice was considered in detail at the Cheshire East Local Plan Strategy examination. In that case it was determined that sufficient safeguarded land should be made available for another full plan period following the end of the current plan period. Paragraph 99 of the Cheshire East Local Plan Strategy Inspector's report states: ✓

"The overall amount of proposed Safeguarded Land is intended to meet longer-term development needs stretching well beyond the end of the current plan period; in fact, taking account of other sources of land, it should be sufficient for another full 15-year period beyond 2030, so that the Green

Belt boundary defined in the CELPS-PC will not need to be amended until at least 2045."

- 7.7 It is important to note that the Cheshire East Local Plan Strategy examination was suspended to allow, amongst other reasons, further work to take place in relation to the amount of safeguarded land. This is made clear in the Further Interim Views of the Inspector which form Appendix 2 to the Inspector's report. Paragraph 49 of the Further Interim Views states:

"The SLAN & SLTA consider various options for Safeguarded Land, including different amounts and timescales, and conclude that the identification of 200ha of land (the mid-point of a range between 155-244ha) would be sufficient to accommodate development needs for a period of 8-10 years beyond the current plan period; with other sources of land outside the Green Belt, including brownfield/recycled and windfall sites, this would meet predicted development requirements for a period of 15 years beyond 2030."

- 7.8 Paragraph 50 concludes that this quantum of safeguarded land would be sufficient:

"There is little guidance available on defining the appropriate amount of Safeguarded Land, but after considering best practice, an approach which considers a 10-15 year period beyond the end of the current plan period seems reasonable in the context of Cheshire East; it strikes a reasonable balance between avoiding the need to review the Green Belt at the end of the current plan period and avoiding unnecessary releases of Green Belt land at this time."

- 7.9 Therefore in summary, sufficient safeguarded land should be provided to ensure that the current requirement could be carried forward to the next plan period (i.e. to at least 2053, assuming that the current plan is not adopted until 2022) without the need for Green Belt release. In practice the minimum requirement is to provide a similar amount of safeguarded land to the amount of Green Belt being released for development in this plan period. Ideally more should be provided, to allow flexibility for higher growth and to increase the permanence of the Green Belt.

- 7.10 Turning therefore to the quantum of safeguarded land proposed in the new St Helens Local Plan:

- Firstly, the plan allocates some 265ha for employment use. However, only 86ha of safeguarded land for employment use is provided. This is clearly insufficient.
- Secondly, the Council has significantly under-estimated the amount of Green Belt land that has been released from the Green Belt for housing (please see our representations

to Policy LPA05 in relation to housing land supply). Consequently it has also significantly under-estimated the amount of safeguarded land that is required for the next plan period.

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7.11 This must be remedied through the designation of additional safeguarded land.

8. Policy LPC01: Housing Mix

- 8.1 Part 1 of the policy requires the mix of housing on development proposals to be informed by "relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA)." All development plan policies must be clear and transparent. The policy as worded is extremely ambiguous and is not clear what 'relevant evidence' is (other than the SHMA). Furthermore, the wording of the policy refers to the 'latest' SHMA, suggesting that that the policy requirement could in effect change over time, without being tested through the development plan process. (6)
- 8.2 Turning to the mix set out within the 2018 SHMA, this is driven by the demographic makeup of new households. There is insufficient assessment of market demand. Many households choose to occupy houses with more bedrooms than technically required, for example older households who choose not to downsize and households requiring guestrooms, home offices etc. By failing to adequately account for demand additional pressures will be placed upon the housing market. This must be reflected within the policy.
- 8.3 Part 2 of the policy states that the Council will apply the optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended). The Council's own viability evidence indicates that such a requirement would not be viable on a number of sites (see Table 6.19 of the Council's viability assessment). The proposal therefore conflicts with paragraphs 56-002 and 56-003 of the PPG. (7)
- 8.4 Finally, Part 3 of the draft policy requires at least 5% of new homes on greenfield sites that would deliver 25 or more dwellings to be bungalows. There is no evidential basis for this requirement. The 2018 SHMA simply states at paragraph 7.37:
- "The sources used for analysis in this report makes it difficult to quantify a need/demand for bungalows in the Borough as Census data (which is used to look at occupancy profiles) does not separately identify this type of accommodation. However, it is typical (where discussion are undertaken with local estate agents) to find that there is a demand for this type of accommodation."* (8)
- 8.5 Therefore it is apparent that there is no analysis of need undertaken through the SHMA; it is simply assumed that there is demand because it would be 'typical' to find demand if it had been investigated.

9. Policy LPC13: Renewable and Low Carbon Energy Development

9.1 Part 4 of the policy states:

"Proposals for new development within a strategic employment site or a strategic housing site (as defined in Policies LPA04.1 and LPA05.1) must, unless this is shown not to be practicable or viable, ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy source(s)."

9.2 The Council's own viability evidence indicates that such a requirement would not be viable on the majority of sites (see Table 6.19 of the Council's viability assessment). In accordance with paragraph 57 of the Framework, it should not be necessary for viability to have to be assessed on a site by site basis due to a policy requirement which is not viable across the plan.

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10. Summary and conclusions

- 10.1 We have very significant concerns in relation to the proposed plan period, housing requirement and housing land supply. In particular we consider that the anticipated supply from SHLAA sites during the plan period has been significantly over-estimated. We also consider that insufficient allocations have been identified to meet the housing requirement. In our view a much higher flexibility allowance is required, to provide a reasonable prospect of the housing requirement being met.
- 10.2 Therefore to boost significantly the supply of housing land, we consider that additional allocations are required. This would provide a reasonable prospect of the requirement being met. We do not consider that the plan should be submitted for examination until these fundamental issues of soundness have been resolved.
- 10.3 Wainhomes is promoting three sites for residential development:
- Land south-east of Lords Fold, Rainford (ref: HA14)
 - Land off Winwick Road, Newton-le Willows (ref: HS17)
 - Land off Camp Road & Strong Road, Garswood (ref: HS01)
- 10.4 Representations specifically in relation to the above sites are submitted under separate cover.
- 10.5 The land south-east of Lords Fold, Rainford was previously proposed as an allocation for residential development in the Preferred Options consultation. The land off Winwick Road, Newton-le Willows and the land off Camp Road & Strong Road, Garswood were proposed as safeguarded land. However in the Submission Draft, only the land off Winwick Road, Newton-le Willows is proposed as safeguarded land. The other two sites would be retained as Green Belt.
- 10.6 We consider that the above sites represent logical allocations, which are capable of delivering sustainable development to meet the identified shortfall in housing land. Their sustainable credentials are reflected in the previous Preferred Options Draft, which proposed the sites for release from the Green Belt. We therefore propose that they are allocated for residential development, in order to meet the shortfall in housing land supply and flexibility that we have identified.

11. Appendices

- EP1. Liverpool City Region Growth Deal
- EP2. Comments on SHLAA sites without planning permission

EP1

LIVERPOOL CITY REGION GROWTH DEAL

The Liverpool City Region Growth Deal aims to re-establish its reputation as a first tier global city, building on the success of the International Festival for Business. It focuses on transport and skills projects which will support the city region's ambitions to create a freight and logistics hub serving an expanded Port of Liverpool.

The Growth Deal, subject to a satisfactory conclusion of the funding agreement, will bring together local, national and private funding as well as new freedoms and flexibilities to focus on four key priority areas as identified in the LEP's Strategic Economic Plan:

- Creating a **freight and logistics hub** which will put the city region in the best place to respond to changes in the UK and international logistics market
- Building on the revival of **Liverpool city centre** as a world class business and leisure destination
- Driving the transfer of the city region's energy supply to **low carbon** and renewable sources as part of the LCR²Energy initiative
- Skills and business support to enable growth.

The Liverpool City Region has secured **£232.3m from the Government's Local Growth Fund to support economic growth in the area – with £35m of new funding confirmed for 2015/16 and £153.2m from 2016/17 to 2021**. This includes:

- as part of the Government's ongoing commitment to the Liverpool City Region a provisional award of a further £153.2m of funding over the years to 2020/21.
- £44.1m of funding which the Government has previously committed as part of Local Growth Deal funding to the area

This substantial investment from Government will **bring forward at least £30m of additional investment from local partners and the private sector. Combined together this will create a total new investment package of £262.3m for the Liverpool City Region LEP**

By 2021, this Deal will create at least 10,000 jobs and allow 10,000 homes to be built.

The Liverpool City Region LEP brings together the six local authorities of Liverpool, St Helens, Wirral, Knowsley, Sefton and Halton, private sector partners and higher education partners such as Liverpool Hope University, Liverpool John Moores University and the University of Liverpool.

Summary of Liverpool City Region Growth Deal projects and funding

Liverpool City Region LEP Local Growth Fund breakdown (£m)			
	2015/16	2016 onwards	Total
Local Growth Fund award	35	74.5	109.5
Previously committed funding	10.7	33.4	44.1
Provisional allocation to projects starting in 2016/17 and beyond	-	78.7	78.7
Total	45.7	186.6	232.3

The table above includes the provision of £3,000,000 loan funding (subject to due diligence) to BDW Trading LTD to accelerate the delivery of 669 homes on the Kew Southport site.

These totals exclude match funding for European Social Fund (ESF) skills activities. The total amount of ESF skills activity LEPs have planned in their draft strategies over the 7 year programme is currently just over 1 billion Euros. Actual skills ESF match will be used on the basis of the skills activity which is delivered at LEP level according to their final strategies.

Liverpool City Region LEP and Central Government have agreed to co-invest in the following jointly-agreed priorities:

- **Knowsley Industrial Park** – access improvements to one of Europe's largest industrial parks, which are expected to create thousands of jobs
- **A £47.7m package of improvements for six colleges** – equipment and facilities improved at six city region colleges to ensure that young people are properly trained for the jobs of tomorrow
- **Over £50m of investment in key transport connections into and within Liverpool City Centre**, revitalising the north of the city and better connecting Liverpool's iconic waterfront to the city centre
- **A new low carbon fund for colleges** – to encourage energy efficiencies in colleges
- Improvements to the **A5300 Knowsley Expressway** to maximise the benefits of the New Mersey crossing and access to Liverpool Airport
- **Improving the Newton-le-Willows interchange**, creating a fully accessible station and transport hub
- Reopening the **Halton Curve** rail line to improve connectivity across the region
- **Improvements to M58 junctions**, increasing capacity and access for the city region
- Development of a **new station at Maghull North**, improving transport across north Liverpool
- A package of **sustainable transport improvements across the city region**
- Committing to a **second International Festival of Business** in 2016
- **A reshaped Liverpool Skills for Growth Bank** which will support employers who are willing to invest in training to source high quality training provision and to grow the skills base in the city region, building on this successful City Deal programme

Local flexibility over Growth Deal programme: Liverpool City Region has demonstrated strong partnership arrangements which deliver collective decisions, has articulated a clear and deliverable vision for growth in the area, and has established strong financial monitoring procedures and cross local authority collaboration. Government will disburse funds to the LEP annually in advance. Liverpool City Region will be expected to deliver the projects highlighted in the Deal, but will have flexibility over the management of these projects in order to deliver the greatest economic benefits to the area. Any significant changes to the projects will need to be discussed with the Government in advance.

The Growth Deal does not amount to an endorsement of everything in the submitted SEP. All development decisions for specific proposals must go through the normal planning process and be guided by local plans taking into account all material considerations.

The Liverpool City Region Growth Deal

The Liverpool City Region Growth Deal focuses on four priority areas:

- **Creating a Liverpool City Region Freight and Logistics Hub**
- **Liverpool City Centre**
- **Low Carbon Liverpool City Region**
- **Skills and business support to enable growth**

These align with three of the core priorities of the Liverpool City Region Growth Plan. The LEP and local partners will use the other resources available, such as Regional Growth Fund and European Regional Development Fund, to deliver larger investments in the other priorities in their Growth Plan, however this Growth Deal will confirm freedoms and flexibilities for the Liverpool City Region that will enable the delivery of all local priorities.

Creating a Liverpool City Region Freight and Logistics Hub

Changes in the global logistics industry are creating substantial opportunities for Liverpool City Region and the UK. The widening of the Panama Canal and the £340m private sector investment in new port facilities in the Liverpool2 project open up new economic opportunities for the city region, the Atlantic Gateway, the North of England and the UK as a whole. The programme of projects in this section of the Growth Deal builds on the investment in Liverpool2 and the £600m investment in the Mersey Gateway. Both these projects complement the Atlantic Gateway initiative and the aspirations of the Cheshire and Warrington and Greater Manchester LEPs for job creation resulting from expanding freight capacity.

Aligning to this the Growth Deal supports improved access by a range of transport modes to and from the Port of Liverpool site in Sefton to ensure opportunities for economic growth and job creation are maximised. This builds on the Liverpool City Region City Deal, with substantial funding for this priority coming from sources other than the Local Growth Fund.

Liverpool City Region LEP commitments	Central Government commitments
<ul style="list-style-type: none"> • Deliver local investment of £0.6m in access improvements to Knowsley Industrial Park • Deliver local investment of £1m in improvements to the A5300 Knowsley Expressway • Deliver local investment of £1.4m in improvements to the Newton-le-Willows interchange • Fully develop and secure local investment in the re-opening of the Halton Curve rail connection, improving links with North Wales • Fully develop and secure local investment in improvements to junctions on the M58 • Fully develop and secure local investment in the development of Maghull North Station • The LEP and partners agree to the LEP to take a more proactive role in consultation on long-term rail planning and franchise specification; and provide a co-ordinating role between constituent local authorities • The LEP agrees to take a more proactive role in consultation on long-term strategic road network planning and provide a co-ordinating role between constituent local authorities 	<ul style="list-style-type: none"> • Invest £5.6m in 2015/16 access improvements to Knowsley Industrial Park • Invest £4.0m in the A5300 Knowsley Expressway, including £2.0m in 2015/16 • Invest £14.4m in the Newton-le-Willows interchange, including £4.4m in 2015/16 • £41.4m for a package sustainable transport improvements across the LEP area, including £6.9m in 2015/16, subject to DfT scrutiny of business cases prior to delivery • Commit provisional allocations for the following projects from 2016/17: <ul style="list-style-type: none"> ○ £10.4m for the Halton Curve ○ £5.5m for improvements to junctions on the M58 ○ £6.2m for the development of Maghull North Station • Department for Transport, Highways Agency and Network Rail commit to continue working closely with Liverpool City Region in the local governance arrangements set up following the City Deal. Government is also supportive of the wider Atlantic Gateway proposal and is investing in its support e.g.

Mersey Gateway, Western Gateway in Salford and the 3MG site in Halton as well as North West Electrification and the Northern Hub. As part of our commitment to rebalance the economy, Government will continue to prioritise investment in national networks to support Atlantic Gateway

- The Department for Transport and Network Rail commit to more proactive engagement of the Local Enterprise Partnership in the long-term rail planning process (e.g. Route Studies) and in rail franchise specification through targeted local engagement of the LEP as part of an enhanced consultation process. The Department for Transport also commits to encourage bidders for franchises to identify and take into account the priorities of LEP and other key local stakeholders as part of the franchising process, and will also encourage Train Operating Companies to continue with, and enhance where possible, their engagement with LEP as key local stakeholders
- The Highways Agency commits to developing more proactive and collaborative approaches to promoting national and local growth and commits to continue building strong relationships and working arrangements with LEP and the Local Enterprise Partnership Network, in the same way as with Local and Combined Authorities and the Local Government Association. Through its Route Strategies, the Highways Agency will engage the LEP in better understanding the challenges and opportunities associated with the network and to develop evidence based long-term plans to bring about much needed local economic growth and development, and commits to providing each LEP with a named contact, generally the relevant regional director. The Highways Agency commits to forming a Growth and Economic Development Group to support LEPs at a national and sub-national level, and a draft licence published on 23rd June 2014 for the new Highways Agency company includes a requirement to co-operate, which will underpin the arrangements described above

Liverpool City Centre

Over the last decade investment within Liverpool city centre has been a key driver in the revitalisation of the city region. The city contains high-quality retail, business, residential, a world-class tourism and leisure offer, Universities and the iconic Liverpool Waterfront, along with access to a skilled labour pool, all of which have contributed to the strong international profile of the entire city region.

This has recently been further demonstrated and enhanced through the International Festival of Business. Building Liverpool's successful delivery of the 2014 International Festival for Business the Government is committed to supporting Liverpool hosting, on behalf of the UK, a **2nd International Festival of Business in 2016**. Subject to a full business case and match funding from the private sector and local sources the government will provide in principle

commitment of £5m through the Local Growth Fund. Government, including UK Trade and Investment, will also support Liverpool to successfully deliver the festival.

Liverpool City Region LEP commitments	Central Government commitments
<ul style="list-style-type: none"> • Deliver local investment of £1.3m in improvements to the Strand and connecting the waterfront with the city centre in Liverpool • Deliver local investment of £5m in a package of improvements to connections within and into the centre of Liverpool (City Centre Connectivity programme) • Deliver local investment of £1.8m in North Liverpool key transport corridors • Fully develop and secure local investment in a second International Festival of Business to be held, on behalf of the UK, in 2016 	<ul style="list-style-type: none"> • Commit provisional allocations for the following projects from 2016/17: <ul style="list-style-type: none"> ○ £5.4m for the City Centre Strand Corridor project ○ £33m for the City Centre Connectivity programme ○ £13.3m for improvements to North Liverpool key transport corridors ○ £5m for a second International Festival of Business • Government recognises the commitment and enthusiasm, set out in the Liverpool City Region Strategic Economic Plan, for maximising the economic benefits of HS2, and welcomes the proposals developed by the LEP. Government remains equally committed to ensuring that the positive economic impact of HS2 is felt across the country, particularly in the Midlands and North. The forthcoming response to Lord Deighton's HS2 Growth Taskforce report, <i>Get Ready</i>, will set out a series of measures to harness the transformational impact of HS2 and spread these benefits across the country. • The Homes and Communities Agency will continue to work with and align priorities with the LEP and local authorities working with them to help develop bids against key Homes and Communities Agency programmes and to continue to work together to deliver key projects within the LEP area and the Mayor's priorities including: <ul style="list-style-type: none"> ○ Edge Lane – major artery into the city, promoting access and growth into city centre as well as regeneration of wider Edge Lane corridor including the iconic Littlewoods Building ○ Improvements to Liverpool Lime Street and surrounding public realm

Low Carbon Liverpool City Region

Liverpool City Region is well placed to develop and take opportunities for low carbon and energy sector growth. Over £18bn is being invested by the private sector off the coast of the Liverpool City Region in some of the world's largest offshore wind projects and Liverpool's status as a Centre for Offshore Renewable Engineering (CORE) the city region is in a unique position to exploit, on and offshore, west coast low carbon and renewable growth opportunities. The majority of the public sector investments being made in this area flow from sources other than the Local Growth Fund but this Growth Deal includes a specific commitment to support local skills providers to reduce their energy costs and, in doing so, test new technologies for energy efficiency.

Liverpool City Region LEP commitments	Central Government commitments
<ul style="list-style-type: none"> • Deliver the skills Low Carbon Fund to increase energy efficiency across colleges and other skills providers in the city region 	<ul style="list-style-type: none"> • Invest £6.5m, including £1.5m in 2015/16 to support the creation of the skills Low Carbon Fund • The Environment Agency, Natural England, Forestry Commission and Marine Management Organisation will work closely with the Liverpool City Region LEP in accordance with the Defra Network offer. They will also work alongside the Merseyside Environmental Advisory Service to implement the single point of contact working model and to develop environmental baseline information

Skills and business support to enable growth

The Liverpool City Region Growth Deal also provides support to local growth in two key enabling areas: enabling competitive business and delivering skills for growth. Both of these build on successful programmes set in place through the Liverpool City Deals and other locally-led interventions.

This will include significant additional funding, secured through the Growth Deal, to build on the lessons learned in delivery of the Skills for Growth Bank and commit £4.6m over three years (in 2015/16 and subject to Departmental budgets being available in 2016-17 and 2017/18) to **co-invest in a reshaped Liverpool Skills for Growth Bank** which will support employers who are willing to invest in training to source high quality training provision and to grow the skills base in the Liverpool City Region by:

- Simplifying the skills system to provide a single gateway for businesses investing with Government in skills training
- Co-investment in apprenticeships, work-based learning and blended learning activity with employers and individuals
- Testing the implementation of the new employer-routed funding model
- Capacity Support for small and medium enterprises to engage with new apprenticeships funding systems.
- Considering how the Skills Bank investment model can be used to increase business influence over skills provision in line with LEP priorities

In addition, Government will support Liverpool City Region in ensuring that learning and expertise are retained from their current programme through 2014-15 as they develop the next phase of the Skills Bank approach.

Alongside this Government will work with Liverpool City Region to develop a **payment by results pilot** with the aim of better aligning skills provision with locally determined, business driven outcomes.

Since the formation of the Local Enterprise Partnership partners have travelled a great distance in terms of overall governance and accountability arrangements. The Liverpool City Region Employment and Skills Board has undertaken a significant role in challenging the employment and skills delivery system and support the implementation of a skills offer better aligned to our economic growth priorities. We are now going further by formalising arrangements into a new legal structure through the creation of a Combined Authority. In addition to providing more collaboration and accountable body structures, this will significantly strengthen the local democratic accountability of employment and skills activity.

Government also confirms an additional £550k for improved business support.

Liverpool City Region LEP commitments	Central Government commitments
<ul style="list-style-type: none"> • Provide up to £5m public and private funding in 2015/16 to support the delivery of the local growth hub • Provide a clear model for coordinating and simplifying business support so that it joins up national, local, public and private support and creates a seamless customer experience for businesses, 	<ul style="list-style-type: none"> • Provide £0.5m revenue funding to the LEP for growth hub business support coordination, subject to the growth hub meeting minimum conditions that reflect the position agreed by the Government review on business support and services • Invest £34.6m, including £11.6m in 2015/16 in skills

which makes it easy for them to get the right support at the right time

- Liverpool City Region commits to continued delivery of the 'Skills for Growth Bank' to empower employers to co-invest their cash in the skills they need for growth
- Government recognises that LEPs are well positioned to enhance the current Careers Information, Advice and Guidance offer. To achieve this Liverpool City Region will facilitate stronger linkage between education providers and local businesses. We will also work with relevant local stakeholders to communicate our priorities and align our offer to the National Careers Service (NCS) providers ahead of the new service's roll-out in October 2014 in order to augment the service
- The LEP will consider skills implications as part of decision making on growth strategies
- The LEP will clearly articulate and evidence their skills priorities in the light of strategic national and local growth opportunities and communicate them to the FE and skills sector
- The LEP will positively engage the further education and skills sector in key strategic partnerships e.g. Skills and Employment Boards
- The LEP will recognise where the private sector has a responsibility to invest in skills provision and work with business and the skills system to realise that investment
- To support extension of superfast broadband coverage to 90% of UK premises by 2016, via existing broadband projects, Liverpool City Region LEP will commit to work with local partners and BT to support delivery. To support extension of superfast broadband coverage to 95% of UK premises by 2017, Liverpool City Region LEP will also work with local partners to help ensure match funding is in place for the next round of projects
- The Government expects Liverpool City Region LEP to open up new jobs associated with the Local Growth Fund to local unemployed and long-term unemployed people working closely with local and national back to work initiatives. This would be part of a wider expectation that local areas use the Social Value Act, drawing on best practice across local councils and central expertise in maximising social value
- This Government remains committed to helping all

capital funding

- Recognise that Liverpool City Region has played a leading role in the delivery of skills at a local level. In 2012 Liverpool City Region signed a City Deal with Government which included an employer-owned mutual to simplify skills funding through grants and loans to businesses
- Work with Liverpool City Region on the co-design and options for delivery of a payment by results pilot for learners aged 19+. The pilot will consider the link between skills investment and improving opportunities for disadvantaged learners
- Commit to working with Liverpool City Region to help ensure that local employer priorities are fed into the operations of the new National Careers Service providers in Liverpool city region
- Government, through the Skills Funding Agency, will support the process to ensure that provision meets local priorities and that increasing responsiveness is delivered through a three-pronged approach:
 - Procurement of new provision: LEPs will be involved throughout the process and providers' track records against LEP requirements will be considered as part of this assessment
 - Accountability: Providers will be required through their funding agreements with the Agency to explain to LEPs details of their provision and planning and we are testing ways in which they can be most effectively held to account for being responsive to local economic priorities. The Skills Funding Agency is trialling Skills Incentives Pilots from 2014/15 in Stoke and Staffordshire, the North East and West of England, designed to explore the mechanisms through which providers will account to LEPs for delivery
 - Allocations and Intervention: In future years providers' records in delivering to LEP requirements will be taken into account when setting allocations and triggering interventions. From 2015/16 the Skills Funding Agency will take into account the outcomes of the Skills Incentive Pilots in Stoke and Staffordshire, the North East and West of England, in making allocations to those providers in scope; subject to evaluation of the pilots, these mechanisms will be rolled out to other LEPs in future years
- Set out revised information for LEPs on how they can take advantage of this approach and options for seeking advice if provision is not responsive to their

young people to achieve their potential and specifically to reduce long-term youth unemployment. As part of this commitment the Deputy Prime Minister launched the Youth Contract for Cities in November 2013 providing local areas with devolved funding to boost employment opportunities for young people. As part of this, Liverpool City Region was awarded £5.9m from the Government to develop its youth employment programme, including through the use of a personalised budget approach. Alongside this Growth Deal, the Government expects Liverpool City Region to deliver against its commitments towards youth employment

- Through the Employment and Skills Board provide clear leadership to the employment and skills system within the Liverpool City Region, as a formal part of the Combined Authority arrangements
- Produce annual Skills for Growth reports to set out the key issues being faced by residents and businesses within the Liverpool City Region

needs. The Skills Funding Agency will publish information during summer 2014 on how LEPs can influence the use of all skills budgets in their localities, and the steps they can take if they are dissatisfied with the pattern of delivery

- Seek to improve the provision of skills data for LEPs and will develop and publish new reports that will quantify and assess responsiveness to local skills needs. In the summer of 2014 the Skills Funding Agency will provide all LEPs with a data set that updates them on the provision delivered in their areas
- As part of the new Combined Authority arrangements we will ensure that reporting on the performance of nationally funded skills programmes is built into the Combined Authority governance structure with the intention of enabling local partners to be better informed on the performance of nationally funded skills programmes and provision and to deepen the understanding of provision within the Liverpool City Region
- Agree with the Liverpool City Region a process by which the key providers of employment and skills services within the area are expected to demonstrate how provision is contributing to the delivery of the City Region's priorities. This will include if appropriate a clear requirement for this information to be submitted. We will explore whether this needs to be incorporated on a voluntary or mandatory basis
- UK Trade and Investment will commit to effectively communicating its strategic priorities to LEPs and where possible help them access relevant opportunities. UKTI has doubled the number of Partnership Managers to 16. This will ensure that UKTI can work more closely with LEPs and help build their capability to secure more inward investment
- The Technology Strategy Board recognises the important and valuable role that LEPs are playing in promoting and supporting innovation, and is committed to developing strong and effective relationships with LEPs both individually and collectively to build on this. The Technology Strategy Board is committed to supporting LEPs in developing the emerging Growth Hubs and in exploring how LEPs can help drive up local business awareness and engagement in Technology Strategy Board programmes and initiatives

As part of the deal, the LEP will:

- **Strengthen governance:** The formation of the Combined Authority provides the Liverpool City Region with a strong foundation from which to progress. Government expects the LEP and Combined Authority to build on this success to improve operational partnership working, including the joint prioritisation of resources over the city region. In particular Government will expect to see demonstrated progress in the pooling of resources for economic development and business support across the LEP area
- **Ensure implementation and demonstrate success,** by tracking progress against milestones and agreed core metrics and outcomes in line with a monitoring and evaluation framework. This will include agreeing monitoring metrics and reporting arrangements with the Government by September 2014. The LEP will also produce an evaluation plan for the projects contained in the Deal before April 2015
- **Communicate the ongoing outputs and outcomes of the Deal to the local community and stakeholders** by publishing the Growth Deal and reporting regularly, and publically, on their progress to implement the strategy, ensuring that local people understand how Government money is being spent via the Growth Deal, and what the benefits are for them and the area. The Cities and Local Growth Unit will continue to work with the LEPs on communications activities, and help make the links with other Government communications teams.
- **Ensure value for money** by developing robust processes that will guide local decision-making. This will include agreeing an assurance framework with the Government by September 2014, building on existing local and national frameworks.

Funding for projects starting in 2016/17 will be subject to conditions that Government will discuss with the LEP over the next few weeks and months, along with establishing the best timetable for the project, taking into account practicalities and affordability.

The Government commits to opening discussions with the LEP right away on its priorities for the next round of Growth Deals. In future rounds Government will welcome the development of projects which have been discussed during the negotiation of the Growth Deal, such as the Wirral Dock Bridges project, and projects which are in development by local partners, for example planned improvements to Heron Road to West Kirby access in Wirral.

EP2

EP2 – Comments on SHLAA sites without planning permission

Site ref 1: Land rear of 1-27 Station Road, Haydock (Capacity = 12 dwellings)

- 1.1 The site is 0.4 ha in area. A number of planning applications for residential development have been made at the site since 2000 (LPA refs: P/2004/1549, P/2009/0398, P/2009/0926, P/2010/0611, P/2011/0161). Even when outline planning permission was granted, it was not implemented and expired. The 2017 SHLAA reports that a pre-application enquiry for 12 dwellings had been made. This appears to have been made in 2016 (ref: PRE/2016/0007/PRE), and has not led to a planning application.

Site refs 3, 4 and 5: Land rear of 14 to 20 Weymouth Avenue, land between 8 & 34 Portland Way and land between Weymouth Avenue and Berry's Lane, Parr (capacity = 14, 11 and 18 dwellings)

- 1.2 On 6th October 2017, full planning permission was granted at these sites for 52 dwellings (LPA ref: P/2016/0923/FUL). The applicant was Gleeson Homes. The houses are all open market housing. No affordable housing is to be provided because of viability.

Site ref 7: Land at Park Road, Town Centre (capacity = 28 dwellings)

- 1.3 On 4th December 2017, full planning permission was granted for 26 dwellings (LPA ref: P/2017/0672/FUL). The applicant is Torus / Kier Homes. All of the homes are affordable (affordable rent).

Site ref 9: Moss Nook Urban Village (capacity = 802 dwellings)

- 1.4 This site is a proposed allocation in the Local Plan.

Site ref 10: Land at junction of Sunbury Street and Fir Street, Thatto Heath (capacity = 32 dwellings)

- 1.5 A full planning application for 30 no. dwellings has been made and is pending determination (LPA ref: 3/2018/0882/FUL). All of the dwellings proposed are to be affordable (social rent).

Site ref 13: Land rear of Carnegie Crescent and Goodban Street (capacity = 7 dwellings)

- 1.6 The site had outline planning permission for residential development, which expired on 28th April 2011 (LPA ref: P/2006/0298). A further planning application has not been made.

Site 18: Land at Somerset Street and Sussex Grove, Parr (capacity = 66 dwellings)

- 1.7 The site had planning permission for 86 no. dwellings, which expired on 21st August 2010 (LPA ref: P/2007/0680). A further planning application has not been made.

Site ref 19: Leyland Green Road (capacity = 7 dwellings)

- 1.8 This site was allocated in the UDP (ref: 3H2). On 11th March 2002, outline planning permission for residential development was granted at the site (LPA ref: P/2001/1117), which has subsequently expired. A further planning application has not been made.

Site ref 21: Land at Holly Bank Street, Town Centre (capacity = 34 dwellings)

- 1.9 On 6th February 2018, full planning permission was granted at the site for 66 dwellings (LPA ref: P/2017/0674/FUL). All of the dwellings are to be affordable (62 affordable rent and 4 shared ownership).

Site ref 22: Land at corner of Fairclough Street and Wargrave Road (capacity = 14 dwellings)

- 1.10 The site had planning permission for 61 no. apartments, which expired on 28th February 2011 (LPA ref: P/2004/0996). A further planning application has not been made. The SHLAA refers to problems with land ownership.

Site ref 23: Liverpool Arms and Former Sacred Heart RC Church and School, Borough Road, Town Centre (capacity = 29 dwellings)

- 1.11 Part of the site had outline planning permission for residential development (LPA ref: P/2004/1101) and part of the site had planning permission for 130 apartments (LPA ref: P/2005/1033). Both permissions have expired. A further planning application has not been made.

Site ref 25: Alexandra Park – Former Pilkington HQ, West Park (capacity = 162 dwellings)

- 1.12 The site has no relevant planning history. Part of the site is a grade II listed building.

Site ref 27: Former Bethell Mission Bowling Green, Marsden Avenue, West Park (capacity = 10 dwellings)

- 1.13 The site has in the past had planning permission for 16 dwellings (LPA ref: P/2010/0638) and 12 dwellings (LPA ref: P/2007/0822). Both permissions were allowed to expire and a further planning application has not been made.

Site ref 31: Former Sutton Arms PH, Elephant Lane, Thatto Heath (capacity = 18 dwellings)

- 1.14 The site had planning permission for 18 dwellings, which expired in October 2014 (LPA ref: P/2011/0651). A further planning application has not been made.

Site ref 36: Land and Premises at Lords Fold, Rainford (capacity = 45 dwellings)

- 1.15 On 23rd May 2018, outline planning permission was granted (LPA ref: P/2017/0789/OUP). Only 5% of the homes to be provided will be affordable.

Site ref 38: Land north of Elton Head Road, Thatto Heath (capacity = 375 dwellings)

- 1.16 The site has outline planning permission for up to 352 no. dwellings (LPA ref: P/2018/0060/FUL). It is a proposed allocation in the Local Plan.

Site ref 58: Former Central Works, Church Road, Haydock (capacity = 48 dwellings)

- 1.17 The site historically had planning permission for residential development, which was not implemented (LPA ref: P/2001/0845). A further planning application has not been made.

Site ref 59: Site of former 56-120 Eccleston Street (capacity = 13 dwellings)

- 1.18 The site has no relevant planning history.

Site ref 60: Vacant land adjacent to the rail line, Elephant Lane (capacity = 112 dwelling)

- 1.19 This site was allocated in the UDP (5H10). Despite this a planning application has not been made on the site. The 2017 SHLAA explains that the site has a number of issues:

"This site is former allotments and quarry that has become self seeded and overgrown. There are a number of potential technical issues including access, a buried canal, covenants, noise and contamination which are all currently subject to further investigation."

Site ref 61: Land north and south of Corporation Street (capacity = 169 dwellings)

- 1.20 The site has no relevant planning history. The 2017 SHLAA explains that there is low viability and interest in town centre apartment schemes such as that assumed on this site:

"This cleared former industrial site is centrally located close to St Helens train station. There is a mixed use masterplan being prepared for this site and the wider area surrounding the train station as part of the One Public Estate programme. The viability and market interest in town centre apartment schemes is currently low but this site could come forward within years 0-5 years"

if third party funding is successfully obtained or possibly as an affordable housing scheme."

Site ref 63: Land at Waterdale Crescent (capacity = 10 dwellings)

- 1.21 The site has no relevant planning history. The SHLAA explains that it is amenity use. It states that other better sites are likely to be chosen by developers than this site.

Site ref 64: BT Depot, Sutton Road (capacity = 36 dwellings)

- 1.22 The site formed part of the wider Moss Nook site that had planning permission, which has since expired. The SHLAA explains that the site is in use as a donation centre for Willowbrook Hospice.

Site ref 65: Former Pumping Station, Sutton Road (capacity = 10 dwellings)

- 1.23 The site formed part of the wider Moss Nook site that had planning permission, which has since expired. It also had planning permission for residential development, which expired (LPA ref: P/2004/0546).

Site ref 66: Land off Wargrave Road, Newton (capacity = 7 dwellings)

- 1.24 The site has no relevant planning history. Housing was cleared at the site.

Site ref 69: Site of former Parr Community High School, Fleet Lane (capacity = 54 dwellings)

- 1.25 The site has no relevant planning history.

Site ref 72: Site of former St Marks Primary School, Willow Tree Avenue (capacity = 18 dwellings)

- 1.26 The site has no relevant planning history.

Site ref 74: Site of former 119-133 Crow Lane West (capacity = 9 dwellings)

- 1.27 The site has no relevant planning history. The SHLAA explains that it is in active use as a builders merchants and in mixed ownership. It is not available.

Site ref 75: Christ Church Parish Hall, Chapel Lane, Eccleston (capacity = 10 dwellings)

- 1.28 The site now has outline planning permission for 7 no. dwellings (LPA ref: P/2018/0749/OUP), which was granted on 22nd January 2019.

Site ref 78: Former St Helens Glass, Corporation Street (capacity = 149 dwellings)

- 1.29 The site now has planning permission for 130 extra care apartments (LPA ref: P/2017/0634/FUL).

Site ref 82: Land adjacent Laffak Road and Carr Mill Road, Moss Bank (capacity = 99 dwellings)

- 1.30 A full planning application was made at the site for 150 no. dwellings on 16th January 2019 and is pending determination (LPA ref: P/2016/0036/FUL). All of the dwellings are to be affordable.

Site ref 84: Land adjacent Church of Christ, Heather Brae (capacity = 9 dwellings)

- 1.31 The site has no relevant planning history. The SHLAA states that it is used as informal open space.

Site ref 85: Site of former Our Lady's Primary School, Fleet Lane, Parr (capacity = 21 dwellings)

- 1.32 On 31st January 2019, full planning permission was granted at this site for 54 no. dwellings (LPA ref: P/2018/0502/FUL).

Site ref 87: Land west of Vista Road (capacity = 33 dwellings)

- 1.33 The site has no relevant planning history. The SHLAA states that it is adjacent to a scrap yard and a cement works and landfill site.

Site ref 89: Land rear of 64-94 Marshalls Cross Road (capacity = 12 dwellings)

- 1.34 The site was allocated in the UDP (ref: 5H2). Despite this, a planning application has not been made on the site. However, a pre-application request has been submitted for 12 dwellings (LPA ref: PRE/2019/0031/PREC). Part of the site is in flood zone 3.

Site ref 90: Land to the west of Common Road, Earlestown (capacity = 142 dwellings)

- 1.35 The site now has planning permission for 142 no. dwellings (LPA ref: P/2016/0742/FUL). The site is to be developed by Taylor Wimpey.

Site ref 91: Milton Street, Bold (capacity = 25 dwellings)

- 1.36 The site had planning permission for residential development, which expired (LPA ref: P/2012/0512). The SHLAA explains that it is allotments and some of the site is in flood zone 3.

Site ref 95: Site of former Carr Mill Infants School, Ullswater Avenue (capacity = 53 dwellings)

- 1.37 The site has no relevant planning history.

Site ref 96: Land rear of 350 Warrington Road (capacity = 11 dwellings)

- 1.38 The site has no relevant planning history. The SHLAA confirms that the site is in mixed ownership and access to it would be difficult to achieve.

Site ref 102: Auto Safety Centre, Vicarage Road, Blackbrook (capacity = 9 dwellings)

- 1.39 The site has no relevant planning history. The SHLAA recognises that the site is in active use as a car repair garage.

Site ref 103: Land rear of 39-67 Valentine Road (capacity = 10 dwellings)

- 1.40 The site has no relevant planning history. The SHLAA explains that it comprises of cleared former garages and some open space.

Site ref 106: Site of former 126-154 Birchley Street (capacity = 10 dwellings)

- 1.41 The site has no relevant planning history. The SHLAA explains that it is in active use as a car park.

Site ref 109: Land adjacent Piele Road, Haydock (capacity = 13 dwellings)

- 1.42 The site has no relevant planning history. The SHLAA explains that the site is currently used as informal open space next to a roundabout.

Site ref 111: Land east of City Road, Cowley Hill (capacity = 813 dwellings)

- 1.43 This site is a proposed allocation in the Local Plan.

Site ref 112: Land to the rear of Juddfield Road (capacity = 41 dwellings)

- 1.44 The site was allocated in the UDP (ref: 2H7). Despite this, the site has no relevant planning history. The SHLAA states that it is currently in use as a scrap yard and is in mixed ownership.

Site ref 113: Land at Willow Tree Avenue (capacity = 50 dwellings)

- 1.45 The site was allocated in the UDP (ref: 6H3). Despite this, the only relevant planning history relates to the proposed use of the site as sports fields, which was refused on 29th April 2014 (LPA ref: P/2013/0775). The SHLAA explains that there are pylons and electric cables running across the site.

Site ref 114: Land at 19 and 25 Sutton Moss Road, Parr (capacity = 14 dwellings)

- 1.46 This site has no relevant planning history. The SHLAA explains that it is in mixed ownership.

Site ref 126: Former Halton and St. Helens PCT HQ, Cowley Hill (capacity = 32 dwellings)

- 1.47 The site now has planning permission for a specialist C2 communal care home (LPA ref: P/2018/0535/FUL).

Site ref 129: Derbyshire Hill Family Centre (capacity = 12 dwellings)

- 1.48 The site has no relevant planning history. The SHLAA explains that it is used as a community centre. There is no evidence that this site will even be available. The SHLAA states:

"If this community centre becomes surplus to requirements, it could potentially provide dwellings over the longer term."

Site ref 133: Land rear of 2-24 Massey Street (capacity = 14 dwellings)

- 1.49 The site has no relevant planning history. The SHLAA explains that the site is located adjacent to industrial uses and there are viability issues in bringing the site forward.

Site ref 134: Land at Littler Road, Blackbrook (capacity = 11 dwellings)

- 1.50 The site has no relevant planning history. The SHLAA explains that the site is used as informal open space and has pipelines running along the southern boundary.

Site ref 135: Land at Newby Place, Moss Bank (capacity = 13 dwellings)

- 1.51 The site has no relevant planning history. The SHLAA explains that the site is used as informal open space.

Site ref 150: Former Red Quarry, Chester Lane (capacity = 57 dwellings)

- 1.52 The site has no relevant planning history. The SHLAA explains that the site is a former landfill site and this may affect viability.

Site ref 151: Land adjacent St.Helens Hospital, Marshalls Cross Road (capacity = 59 dwellings)

- 1.53 The site has no relevant planning history. The SHLAA explains there was interest in the site in 2013, but this has not led to a planning application. It states:

"This cleared former hospital site was of interest to an affordable housing developer 4 years ago but there has been no meaningful progress on bringing the site forwards."

Site ref 152: Sidac Sports Club (capacity = 137 dwellings)

- 1.54 The site now has planning permission for 117 dwellings and is under construction (LPA ref: P/2017/0890/FUL).

Site ref 154: College Street (capacity = 103 dwellings)

- 1.55 The site has no relevant planning history. The SHLAA explains that the site is publically owned land including car park, job centre and register office.

Site ref 155: Land south of Knowsley Road, West Park (capacity = 18 dwellings)

- 1.56 The site has planning permission for 50 no. dwellings (LPA ref: P/2017/0936/FUL).

Site ref 156: Land south of Crab Street, Town Centre (capacity = 21 dwellings)

- 1.57 The site has planning permission for an extra care facility with 61 no. bedrooms (LPA ref: P/2018/0021/FUL).

EL0230



St Helens Local Plan Submission Draft - site specific representations on behalf of Wainhomes NW relating to land off Camp Road and Strong Road, Garswood

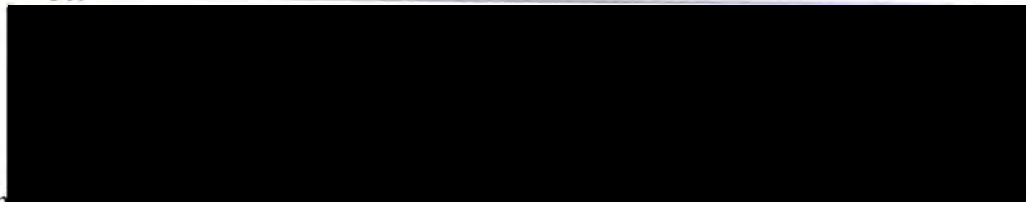
Nick Scott

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:17

Cc:



1 Attachment



Land off Camp Road and Strong Road _ Garswood 2019 combined-reduced.pdf

Dear Sir / Madam,

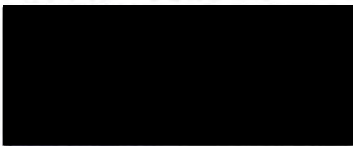
Please find attached, written site specific representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan. These representations relate to their land off Camp Road and Strong Road, Garswood.

We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

Nick Scott
Assistant Consultant



Emery Planning is proud to support the Keaton Emery Memorial Foundation. To find out more about the charity or to make a donation, please visit www.keatonemeryfoundation.com



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- ① - LPA05 } FORMER
- ② - GBR } LPA0 SITE
- ③ - LPA06 (IHS) } HSO1

Land off Camp Road and Strange Road, Garswood

Site-specific representations – St Helens Local Plan
Submission Draft

for Wainhomes (North West) Ltd

EP Project Ref: 17-005

Project : 17-005
Site address : St Helens Local Plan
Preferred Options.
Client : Wainhomes (North West)
Ltd

Date : March 2019
Author : John Coxon

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Emery Planning Partnership Limited trading as Emery Planning.

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1. Introduction

- 1.1 Emery Planning is instructed by our client, Wainhomes (North West) Ltd, to submit site-specific representations to the St Helens Local Plan Submission Draft public consultation exercise. This Statement relates to land off Camp Road and Strange Road and it is supported by technical assessments carried out by Tyler Grange and SCP in terms of landscape, ecology, arboricultural and highways impact. ✓
- 1.2 We have submitted separate representations on behalf of Wainhomes (NW) Ltd to the St Helens Local Plan Consultation Draft with regard to the strategic draft policies. These site-specific representations should be considered in conjunction with our representations to the strategic policies of the St Helens Local Plan Consultation Draft. ✓
- 1.3 This Statement seeks the re-instatement of our client's site as safeguarded land but due to the housing need it should be a housing allocation within the St Helens Local Plan Submission Draft. Further to our previous representations to the Preferred Options consultation in early 2017, we again highlight the suitability of this site for residential development and the 'deliverability' of the site for the purposes of the NPPF, subject to release from the Green Belt. ✓

2. Site location and description

- 2.1 The site is located to the south-eastern edge of Garswood, which is an identified urban settlement within the adopted local plan for St Helens. The triangular-shaped site comprises two fields of semi-improved grassland and unmanaged scrub and ruderal vegetation. There is an electricity sub-station on the site and some stable buildings and an area of hardstanding within the northern part. The overall site area equates to approximately 11 acres and a location plan is provided at **EP1**. There are no public rights of way within the site or adjoining it. ✓
- 2.2 In terms of its relationship to the surrounding area, the site is bounded by Spindle Hillock to the northern boundary, Camp Road to the eastern boundary, the Liverpool to Wigan railway line to the western boundary and Strange Road to the southern boundary with a large industrial estate beyond, which is located within the built-up area boundaries for Garswood and outside of the designated Green Belt. ✓
- 2.3 The site falls within single ownership and our client has an option on it, and it is 'deliverable' for the purposes of the NPPF. ✓

3. Proposed allocation

3.1 The site is capable of approximately 100 dwellings with a proportion comprising affordable/starter homes in accordance with planning policy requirements. The technical assessments undertaken by Tyler Grange and SCP at **EP2** and **EP3** provide a sound basis for securing a masterplan that responds well to the surrounding area and contributes to the sustainable growth of this part of Newton-le-Willows.

3.2 We would suggest that a site-specific allocation of our client's site as a strategic housing allocation with wording that requires the following:

- The provision of around 100 homes comprising an appropriate mix of sizes and tenures.
- The delivery of an element of affordable housing in accordance with planning policy requirements.
- Appropriate access for vehicular traffic and pedestrians and the submission of a Transport Assessment.
- Provision of a comprehensive landscaping plan for the retention and enhancement of landscape features such as trees.
- Contributions to local infrastructure where appropriate and in accordance with planning policy requirements.

3.3 Our client's site was previously identified as safeguarded land through Policy LPA6 of the St Helens Local Plan Preferred Options document in 2016 (ref: HS01). We made representations to that public consultation supporting this designation, and also highlighting that the site does not provide a Green Belt function and it is deliverable within the short-term for new housing as a housing allocation subject to release from the Green Belt.

4. Green Belt considerations

4.1 Our client's site has been assessed as parcel reference GBP_29B through the Draft St Helens Local Plan Green Belt Review 2018. It is assessed through the Green Belt Review as having a low contribution in terms of the two identified main purposes of including land within the Green Belt for the purposes of paragraph 134 of the NPPF (i.e. preventing the merging of settlements and preventing urban sprawl), and has medium significance in terms of safeguarding the countryside from encroachment.

4.2 The site has been scored overall as having a 'medium' contribution to the main purposes of including land within the Green Belt. This is because the methodology set out through the Green Belt Review states that the highest of the three scores for the 3 identified main purposes of including land within the Green Belt i.e. preventing the merging of settlements, preventing urban sprawl and safeguarding the countryside from encroachment. This categorisation overstates the contribution that our client's site makes to the main purposes of including land within the Green Belt. Notwithstanding this point, we do not understand how the Council has assessed this site as having medium significance in relation to safeguarding the countryside from encroachment.

4.3 In terms of preventing urban sprawl, the Assessment states the following:

"The triangular shaped sub-parcel is bounded to the south by Strange Road leading onto Park Industrial Estate, to the north by Spindle Hillock to the east by Camp Road and to the west by a railway line (Wigan to Liverpool main line).

The sub-parcel predominately contains grassland and mature trees run along the northern boundary and the western half of site that screen the railway line to the west and industrial site to the south.

The sub-parcel has strong boundaries to the north, south, east and west and is therefore well contained. The subparcel does not directly adjoin any large built-up areas."

4.4 In terms of preventing towns from merging, the Assessment states the following:

"The sub-parcel broadly contributes, along with GBP_029b, to the physical and visual separation of Garswood and Ashton-in-Makerfield. However a strategic gap between Garswood and Ashton-in-Makerfield could still be maintained if this sub-parcel was released from the Green Belt."

4.5 The previously issued 2016 St Helens Green Belt Assessment identified our client's site as parcel GBS_142 and it provided a score of 'Low' with regard to safeguarding the countryside from encroachment. It is not understood what rationale has been used by the Council in upgrading this score to 'Medium' through the 2018 version of the Green Belt Review. Table 2.5 of the Green Belt Assessment 2018 provides guidelines for the scoring criteria for this Green Belt Purpose. 'Low' impact is where sites include one or more of the following:

- Limited characteristics of the countryside.
- Substantially affected by existing urban features and/or inappropriate development.

- Substantial degree of enclosure provided by strong boundary features.
- Relatively limited sense of openness.

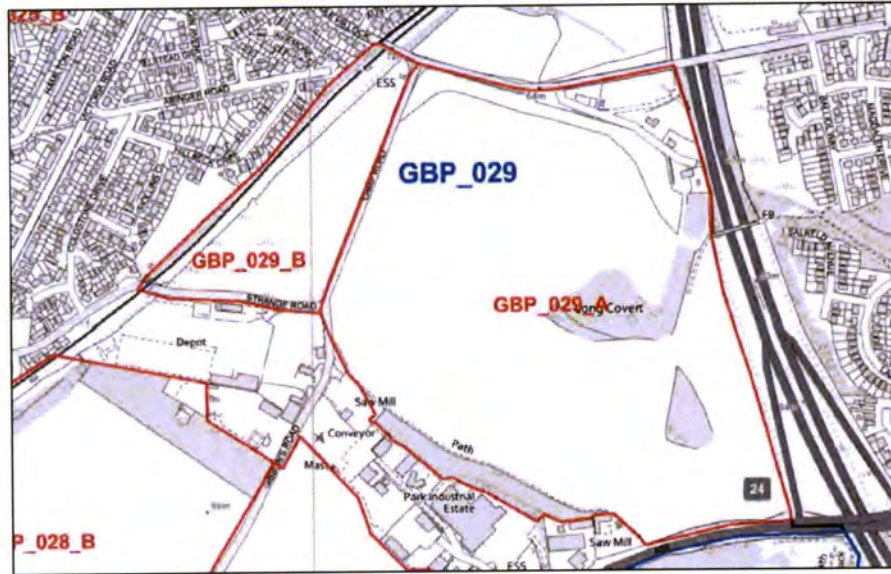
4.6 The above characterises our client's site as acknowledged through the Green Belt Assessment 2016. Indeed, the text in relation to Green Belt Purpose 1 (urban sprawl) states that the site has strong boundaries and is well contained. The site does not enjoy open views given how strongly influenced it is by urban features. There is no justification for upgrading the assessment of the site from 'Low' to 'Medium' impact in relation to safeguarding the countryside from encroachment between the 2016 and 2018 versions of the Green Belt Review.

4.7 By way of illustrating the flawed nature of the Council's assessment, land parcel 29_A, which covers an extensive area of open countryside to the east of our client's site, is assessed as having a 'Low' Impact with regard to Green Belt Purpose 3:

"The sub-parcel has strong boundaries to the north, south, east and west and so is well contained. The sub parcel is bordered by the M6 and industrial estate so has limited countryside characteristics."

4.8 It cannot be the case that our client's site (29B on the map below) makes a higher contribution to safeguarding the countryside than the adjacent site which is extensive in size and benefits from open views. It may well be the case that the Council have made an error in the report and that our client's site should have been assessed as 'Low' whilst the adjacent site should have been assessed as 'Medium':

Image: Parcel 29B (our client's site in relation to 29A) taken from GB Review 2018



4.9 We also copy a Google Earth image below, which clearly shows that the adjacent parcel has a greater contribution towards safeguarding the countryside from encroachment when compared to our client's site:

Image: Parcel 29B (our client's site in relation to 29A) taken from Google Earth



4.10 As with our previous representations to the Preferred Options consultation in 2016, a site-specific assessment of the existing site has also been undertaken by Tyler Grange with regard to Green Belt and landscape. Their main points in terms of the landscape credentials of the existing site are as follows:

- Although mostly open and undeveloped, the site character is heavily influenced by the surrounding urban context of residential development, industrial units and railway line infrastructure, which contribute to a more urban fringe character being evident on-site;
- the railway line and roads form strong boundaries around the site in all directions and this means the site is relatively well-contained physically;
- in terms of visual receptors, there are two main receptors, namely residential properties and open space to the west and users of Public Footpath SN918 to the south east.
- fields within the site are a mixture of semi-improved grassland and unmanaged scrub, small in size and irregular in shape;
- the topography varies with the highest point located to the north west and there is general reduction in elevation southwards with the exception of an area of elevated land to the south west;
- the settlement of Garswood to the west steadily developed after the development of the railway line with the majority of building occurring during the 1970s;
- the residential development along Hillbeck Crescent and Hollins Close is partially visible from the site; and
- industrial units located to the south of the site are partially visible from the site. .

4.11 We also provide a summary of the Green Belt assessment undertaken by Tyler Grange with due regard for the main purposes of including land within the Green Belt as set out at paragraph 134 of the NPPF. See the table below:

Main purpose	Summary assessment undertaken by Tyler Grange
<p>To check unrestricted urban sprawl</p>	<p>The triangular-shaped site is bounded by:</p> <ul style="list-style-type: none"> • Camp Road to the east; • Strange Road to the south with a large industrial estate beyond; • Spindle Hillock to the north; • Liverpool to Wigan railway line to the west. <p>These boundaries provide a robust, permanent and defensible edge such that development would not sprawl</p>

	further in any direction.
To prevent neighbouring towns merging into one another	<p>Development of this site would not result in the coalescence of Garswood and Ashton-in-Makerfield due to the physical separation provided by Camp Road to the east and densely wooded tree belts within the fields beyond. Furthermore, the site area is small and a considerable gap would be retained between Garswood and the M6, which itself provides the most robust boundary to contact Ashton-in-Makerfield to the east.</p> <p>The Tyler Grange assessment does not consider that the site makes a 'high' contribution in terms of this main purpose.</p>
Safeguarding the countryside from encroachment	<p>Whilst the open and currently undeveloped nature of the site gives it a somewhat open character, the direct inter-visibility with the residential edge, the adjacent railway infrastructure and industrial units influences the character of the site and limits the extent to which the site can be considered rural or of a countryside character.</p> <p>Development of this site would safeguard the countryside from encroachment.</p>
Preserve the setting and special character of historic towns	The site does not play a role in the setting or significance of any historic settlement.

4.12 The site-specific assessment undertaken by Tyler Grange demonstrates that this site is suitable for residential development in Green Belt terms. The analysis undertaken by Tyler Grange is informed by fieldwork, an analysis of desktop data sources and an assessment of the visual receptors to development of the site with reference to photoviewpoints. It concludes that the site does not perform any Green Belt functions in terms of preventing settlements merging, preventing urban sprawl, or preventing encroachment on the countryside due to the strong physical and visual containment provided by the residential edge, industrial development and railway line adjoining the site. It is also not considered to have a role in preserving the historic setting of any settlements or landscape features. As such, development of the site would be unlikely to affect the integrity of the wider Green Belt.

4.13 Paragraph 135 of the NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The release of Green Belt land for housing development is necessary in order to meet unmet and future housing needs of the Borough as illustrated through our strategic representations on the overall

strategy of the St Helens Local Plan Submission Draft. This comprises exceptional circumstances for the purposes of the NPPF.

4.14 The release of Green Belt land across the Borough should also be seen within the context of the following bullet points of paragraph 136 of the NPPF:

"When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."*

4.15 With regard to the bullet points set out above, the release of our client's site for housing development would help to meet the identified housing requirements for sustainable development. As demonstrated through the work undertaken by Tyler Grange, the revised Green Belt boundary would be delineated by defensible, permanent and readily recognisable features to all sides.

4.16 Paragraph 136 of the NPPF states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. We undertake an assessment below of our client's land with regard to the three roles of sustainable development as set out at paragraph 8 of the NPPF:

Economic: New housing development is required across the Borough to include areas of the designated Green Belt in order to ensure that the Borough has a stable workforce in terms of ability and age profile. The construction of new houses would also create construction jobs in the short term, and once occupied, new residents would boost householder spending on goods and services within the surrounding area. New housing development would also generate a New Homes Bonus for the Borough.

Social: Paragraph 8 of the NPPF states that one of the requirements is the supply of housing to meet the needs of present and future generations. The release of our client's site for new housing development would help to ensure that the identified housing needs of the Borough in terms of market and affordable housing are met.

Environmental: The site is highly locationally sustainable with easy and convenient access to a wide range of local services and public transport options. The site is located at the edge of Garswood, which is an identified settlement within St Helens and is suitable for major new housing developments in terms of infrastructure requirements. The work undertaken by Tyler Grange demonstrates that the release of this site for housing development would comprise a logical urban extension with negligible impacts in relation to the main purposes of including land within the Green Belt and limited landscape impact. The release of our client's site for housing would relieve the development pressure on more environmentally sensitive greenfield and Green Belt land across the Borough. ✓

4.17 The release of our client's site from the Green Belt for new housing development with immediate effect as part of the emerging local plan is considered to be fully justified with due regard for paragraphs 134 to 139 of the NPPF. ✓

5. Masterplan and technical considerations

5.1 Our client's site-specific representations are supported by the following technical assessments, which are summarised in this part of our Statement:

- Landscape, Ecology and Arboricultural Briefing Note (Ref: 10786/R02) (Tyler Grange) – see **EP2**.
- Highways Technical Note (Ref: DR/17022/TN02) (SCP) – see **EP3**.

Landscape Impact

5.2 The assessment undertaken by Tyler Grange at **EP2** is informed by fieldwork, desktop data search and an analysis of the visual envelope of the site and photoviewpoints likely to be affected by the development of our client's site. Their points can be summarised as follows:

- Although mostly open and undeveloped, the site character is heavily influenced by the surrounding urban context of residential development, industrial units and railway line infrastructure, which contribute to a more urban fringe character being evident on-site;
- the railway line and roads form strong boundaries around the site in all directions and this means the site is relatively well-contained physically; ✓
- in terms of visual receptors, there are two main receptors, namely residential properties and open space to the west and users of Public Footpath SN918 to the south east.
- fields within the site are a mixture of semi-improved grassland and unmanaged scrub, small in size and irregular in shape;

- the topography varies with the highest point located to the north west and there is general reduction in elevation southwards with the exception of an area of elevated land to the south west;
- the settlement of Garswood to the west steadily developed after the development of the railway line with the majority of building occurring during the 1970s;
- the residential development along Hillbeck Crescent and Hollins Close is partially visible from the site; and
- industrial units located to the south of the site are partially visible from the site;
- the existing boundary treatment along Camp Road should be retained, strengthened and enhanced with new planting to further contain the edge of the Green Belt;
- the site is suitable for residential development in landscape terms.

Ecology

5.3 The assessment undertaken by Tyler Grange at **EP2** is informed by fieldwork and a desktop data search. Their points can be summarised as follows:

- no nationally designated site or European designated sites are present within 2km of the site;
- no locally designated statutory sites within 2km of the site, although there a number of non-statutory sites known as Local Wildlife Sites;
- there is species poor hedgerow along the northern and eastern site boundary with intact and defunct sections;
- there are three ponds within 250m of the site;
- surveys should be carried out in order to inform a planning application to include badgers, great crested newts and birds;
- there are no major ecological constraints to the development of the site.

Arboricultural considerations

5.4 The assessment undertaken by Tyler Grange at **EP2** is informed by fieldwork and their points can be summarised as follows:

- the area of scrub woodland to the south-western corner of the site could be retained and enhanced through the development of the site;
- the eastern boundary hedgerow should be retained and restocked in order to plug gaps;

- there are no fundamental aboricultural constraints to the development of the site.

Highways

5.5 The assessment undertaken by SCP at **EP3** can be summarised as follows:

- there are a number of potential access points into the site with a long and straight frontage onto Camp Road, which offers excellent visibility and the ability to provide a high standard of access;
- the site is locationally sustainable in terms of access to key services and public transport, including a convenience store, primary school and GP Surgery within 800m of the site and bus and rail services both within 400m of the site - the regular 156 and 157 bus services provides direct links to St Helens town centre, Rainford, Ashton-in-Makerfield and Haydock and the Garswood Train Station is on the Liverpool, Wigan, Preston route and provides 3 service per hour in each direction;
- there are no obstacles to the delivery of this site from a transport and highways perspective.

Deliverability

5.6 The land at **EP1** falls within single ownership with no legal constraints and our client has an option to bring it forward for housing development. Wainhomes (North West) Ltd is a national housebuilder and is very active across the region with a proven track record in the delivery of new homes. Subject to the land being released from the Green Belt, the site could make a significant contribution to the deliverable 5-year supply of housing.

5.7 Our client's site at **EP1** is 'deliverable' within the short-term for new housing development for the purposes of the NPPF.

6. Evidence base with regard to site constraints

- 6.1 We have set out above through technical reports that there are no obstacles to the delivery of this site for housing in terms of highways, ecology, trees or landscape impact. ✓
- 6.2 Our client's site has been subject to the site selection process set out through the Green Belt Review 2018:
- Step 1: All parcels assessed as having a high or high+ contribution to the Green Belt are excluded.
 - Step 2 – All sites with 'prohibitive constraints' are excluded. ✓
 - Step 3 - The remaining parcels (69 in total) were then assessed as having 'good', 'medium' or 'limited' development potential based on site constraints and deliverability.
- 6.3 As discussed earlier, there appears to have been an error in the assessment of our client's site for the purposes of Green Belt Assessment. There is no sound basis for identifying this site as 'medium' in terms of overall contribution and it should instead be assessed as 'low'. ✓
- 6.4 In terms of Step 3 as set out above, our client's site is assessed through the Green Belt Review 2018 as having 'medium' development potential. Page 88 of the Green Belt Review sets out the basis for identifying our site so poorly in this regard, and copy extracts below: ✓
- *"Development in this location would extend residential growth beyond the existing urban area of Garswood that is well contained along the railway line on the western side. Releasing this land for new housing would create an island of residential development that would not connect well with the existing settlement of Garswood, whilst also narrowing the strategic gap between Garswood and Haydock"*
 - *"Not all of the sub-parcel is developable. The southern part of the sub-parcel is a wildlife habitat and is expected to be retained and identified in the Council's Towns in the Forest scheme. The NDA would, therefore, need be reduced to ensure that the habitat is protected."*
 - *"Whilst access to the sub-parcel is achievable via Camp Road, there are known capacity issues on the surrounding junctions in that location (Tithebarn Road, Liverpool Road and Millfield Lane)."*
 - *"If the sub-parcel was to be developed then attenuation measures would have to be provided to eliminate any unacceptable noise from the railway line that runs along its western boundary. A buffer would also be required within the southern part of the sub-parcel due to its proximity to the existing industrial estate."*

- 6.5 In terms of landscape impact, Tyler Grange conclude through a site-specific assessment that the site is suitable for residential development in landscape terms. The site is heavily influenced by urban features and housing would constitute a small-scale and logical extension of the urban area. The site is presently an isolated island of countryside enclosed by existing built development and urban features. ✓
- 6.6 Turning to ecology, the site has been subject to review by Tyler Grange as discussed earlier and areas of scrub to the southern part of the site could be retained through green infrastructure as part of any development. There is scope for enhancement given that the site is currently unmanaged and Tyler Grange conclude that ecology does not represent a fundamental constraint to development. ✓
- 6.7 Turning to highways, there is no evidence within the evidence base supporting the Submission Draft Plan to suggest that the proposed development could have a severe impact on the wider road network for the purposes of paragraph 109 of the NPPF. The assessment undertaken by SCP finds highways to be no obstacle to the delivery of this site for housing development. ✓
- 6.8 Finally, there is no evidence to suggest that the adjacent railway could undermine the amenity of future occupiers of housing on our client's site. There is scope for a robust landscaping scheme to be secured through any future planning application in order to further safeguard the amenity of future occupiers, and other measures could be secured such as acoustic fencing. It is common for residential development to be located at least as close to the railway line within Garswood e.g. at Hillbeck Crescent on the other side of the railway line. There is no basis for suggesting that potential noise impacts represent a constraint to development. ✓
- 6.9 Further to the above, the SA scores our client's site as performing well and better than many sites that have been subject to a housing allocation through the Submission Draft Plan.] ✓

Table: SA scoring for our client's site (GBP_029B)

Site ID	GB ref	Site Name	Broad Location	Status	SA1: Protect and enhance biodiversity	SA2: Protect and improve land quality	SA3: Improve air quality	SA4: Sustainably manage water resources	SA5: Mitigate against climate change	SA6: Minimise the risk of flooding	SA7a: Landscape sensitivity	SA7b: Distance to prominent ridge/line	SA8: Protect and enhance cultural heritage	SA9a: Access to open space and green space	SA9b: Public Rights of Way	SA12a: Access to GP	SA12b: Access to Leisure	SA13a: Access to Primary School	SA13b: Access to Secondary School	SA14: Access to employment opportunities	SA15: Support local economy	SA16: Access to housing	SA17: Reduce poverty and social exclusion	SA19: Reduce need to travel	SA20: Access to services
		of Rainford By-Pass)																							
14	GBP_011_c	Land to the west of Rainford By Pass south of Mossborough Road	Rainford	Discard																					
15	GBP_013_b	North West National Golf Club / Land between Rainford By-Pass and Rainford Brook south of Pasture Lane	Rainford	Discard																					
16	GBP_015	Land south east of Moss Bank, West of Scalell Road SA1 change	Blackbrook	Discard																					
17	GBP_017	Land north of Moss Bank, off Moss Bank Road and the A571 (Marlindale Road)	Blackbrook	Discard																					
18	GBP_019_a	Land South of Higher Lane, Rainford	Rainford	Site 8HA																					
19	GBP_019_b	Land south of Higher Lane, Rainford	Rainford	Discard																					
20	GBP_023	Land at Ash Grove Farm, south of Beacon Road, Billinge	Billinge	Discard																					
21	GBP_025_a	Land west of Garswood	Garswood	Site 1HS																					
22	GBP_025_b	Land west of Garswood	Garswood	Site 1HA																					
23	GBP_027_b	Land south of Billinge	Garswood	Discard																					
24a	GBP_028_b	Land north of A580 and west of A58	Blackbrook	Discard																					
25a	GBP_028_c	Land north of A580 and west of A58	Blackbrook	Discard																					
26	GBP_029_b	Land east of Garswood and west of M6	Garswood	Discard																					
31a	GBP_033	Land to the east of M6 Junction 23	Haydock	Discard																					
34	GBP_037	Land east of M6 and south of Haydock Park Golf Club	Haydock	Discard																					

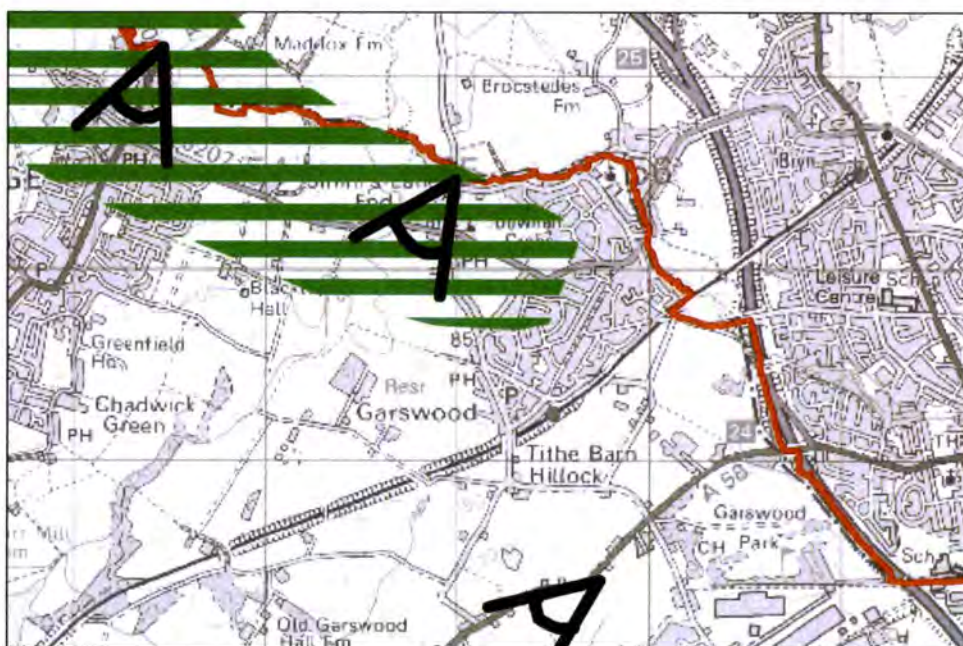
6.10 Our client's site has been assessed through the SA as only one red score, which relates to landscape impact. However, this does not take into account the detailed site-specific assessment undertaken by Tyler Grange which concludes that the site is suitable for residential development in landscape terms. Otherwise, the site is not identified as resulting in any negative effects, although it would result in a number of positive impacts in relation to adapting to climate change, access to GP and access to employment opportunities. As per GBP_028B, which is adjacent to our client's site, we also consider that the site should be scored positively in relation to proximity to secondary schools.

6.11 With due regard for the above points, our client's site should be assessed as follows and included as a draft housing allocation through the emerging local plan accordingly:

- Green Belt Impact (Stage 1B): Low Impact.
- Development Potential (Stage 2B): Good Development Potential.

7. Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood

- 7.1 This site has been identified through the Submission Draft Local Plan as safeguarded land with capacity for 291 dwellings (Site Ref: 1HS). We do not necessarily seek to object to the allocation of this site. However, it is not understood how this site has been retained as safeguarded land in preference to our client's site, which would remain within the designated Green Belt through the Submission Draft, with due regard for the available evidence.
- 7.2 The SA 2018 for the Submission Draft Local Plan assesses "Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road" with two red scores i.e. likely negative impacts. These impacts concern landscape sensitivity and proximity of the site to a prominent ridgeline. It would seem from the St Helens Landscape Study 2006 that the site in its entirety falls within a 'Prominent Ridgeline' and there is a 'Key Visual Gateway' to the top corner of the site:



- 7.3 It is not clear how residential development on this site could take place without negative landscape impacts. This is a particularly sensitive location in landscape terms with the Landscape Character Assessment noting the following:

"Management of woodland and strengthening of hedgerows. Important to retain rural character that separates Billinge and Garswood and provides strong contrast to urban landscape. Tatlock's Hill and associated elevated ridge acts as an important visual horizon which features in views from the south. It is important to maintain the undeveloped character as a wider backdrop to the developed lowland landscape." ✓

7.4 In terms of the potential for new development, the Study concludes:

"This area is not suitable to accommodate large scale change as a result of its high visibility and limited opportunities for mitigation. The upper visual horizon and ridgeline should impose a constraint to development and in particular vertical structures which would skyline in views."

7.5 Table 6.3 of the Green Belt Review provides the following rationale for inclusion of this site as safeguarded land:

"The site is sustainably located with good access to local community facilities and services. However, the site projects further into the countryside than the adjacent site (ref: Aecom 22). Development would not appear as a natural extension to Garswood at this time." ✓

7.6 The above acknowledges that the site projects further into the countryside and would not appear as a natural extension to Garswood. However, there is no acknowledgement of the particularly sensitive nature of the site in landscape and visual terms.

7.7 Pages 83 and 84 of the Green Belt Review acknowledge the potential for adverse visual and Green Belt impacts:

"However, it projects slightly further into the countryside (to the west) and has a more open aspect than the neighbouring sub-parcel GBP_025b. It is therefore considered to form a less logical initial extension of the village than is provided by sub-parcel GBP_025b. It is recommended that the neighbouring sub-parcel GBP_025b be allocated for development within the Plan period, and that sub-parcel GBP_025a be safeguarded to meet potential development needs after 2035." ✓

7.8 The Green Belt Review acknowledges this parcel of land as having medium contribution to the main purposes of including land within the Green Belt and medium development potential. However, it is clear whether the extent to which development on this parcel may undermine a sensitive area in landscape and visual terms (as identified through the Landscape Assessment 2006) has been taken into account by the Council.

7.9 As discussed earlier, our client's site performs better in terms of the SA process with one fewer red score and this relates to landscape impact. However, our client's site falls outside of

influencing distance of a sensitive area/prominent ridgeline and it has been subject to a site-specific assessment by Tyler Grange, which concludes that the site is suitable for housing in landscape terms. Furthermore, our client's site appears to have been assessed in error in relation to Green Belt contribution and should be assessed as having 'low contribution'. Finally, our client's site is within the control of a national housebuilder a proven track record in the delivery of new homes in the region. Subject to the land being released from the Green Belt, the site could make a significant contribution to the deliverable 5-year supply of housing.

- 7.10 With due regard for the above points, we consider that our client's performs better than "Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road" and it should be reinstatement as safeguarded land accordingly, or otherwise as a housing allocation. This Section of our Statement highlights the unjustified way in which our client's site has been omitted as safeguarded land through the Consultation Draft.

8. Local infrastructure

- 8.1 The site is located to the edge of the existing built-up area of Garswood with no fundamental constraints in terms of utilities and surface and foul water connections. It is in close proximity to existing key services such as schools and health facilities. Any planning application could secure the provision of developer contributions to local services such as education and health facilities where appropriate and in accordance with planning policy requirements and the tests set out through the Community Infrastructure Levy Regulations 2010.

9. Summary and conclusions

9.1 Our site-specific representations with regard to land off Camp Road and Strange Road can be summarised as follows:

- Tyler Grange have undertaken a site-specific assessment and conclude that In terms of Green Belt, when assessed from a landscape perspective, the site does not perform any Green Belt functions in terms of preventing settlements merging, preventing urban sprawl, or preventing encroachment on the countryside, nor does it have a role in preserving the historic setting of any settlements or landscape features. ✓
- There is no rationale for our client's site having been assessed as having a greater contribution in relation to safeguarding the countryside from encroachment between the 2016 and 2018 versions of the Green Belt Review. The flawed nature of the assessment undertaken by the Council is illustrated through the adjacent site, which is subject to much more open characteristics, is assessed as having a low contribution in this regard than our client's site. ✓
- Development of the site would be unlikely to affect the integrity of the wider Green Belt. It should be assessed as 'low' contribution for the purposes of the St Helens Green Belt Review 2018. ✓
- The release of the land from the Green Belt for housing is fully justified with regards to paragraphs 134-139 of the NPPF. ✓
- There are no major constraints to development of the site in terms of ecology and arboriculture. ✓
- There are no obstacles to the delivery of this site for the quantum of residential development identified from a highways and transport perspective. ✓
- The site is locationally sustainable in terms of access to key services and public transport. ✓
- Our client's site is within single ownership and Wainhomes (North West) Ltd, a national housebuilder with a proven track record of delivery in the region, has an option on it – the site is 'deliverable' for new housing within the short-term and could make a meaningful contribution to the Borough's 5-year housing land supply position.] 10
- Our client's site has been assessed as performing well through the SA process, although the single negative score awarded in terms of landscape impact takes no account of the site-specific assessment undertaken by Tyler Grange and the potential for on-site mitigation.] 10
- Our client's site should be included as a draft housing allocation on the basis that it scores 'low' in terms of Green Belt impact and 'good' in terms of development potential.

- The omission of our client's site as a housing allocation is not justified through the available evidence base for the Submission Draft Plan.

9.2 The allocation of our client's site for housing development would represent sustainable development, and would assist in meeting shortfall in housing land supply that we have identified in our strategic representations.

10

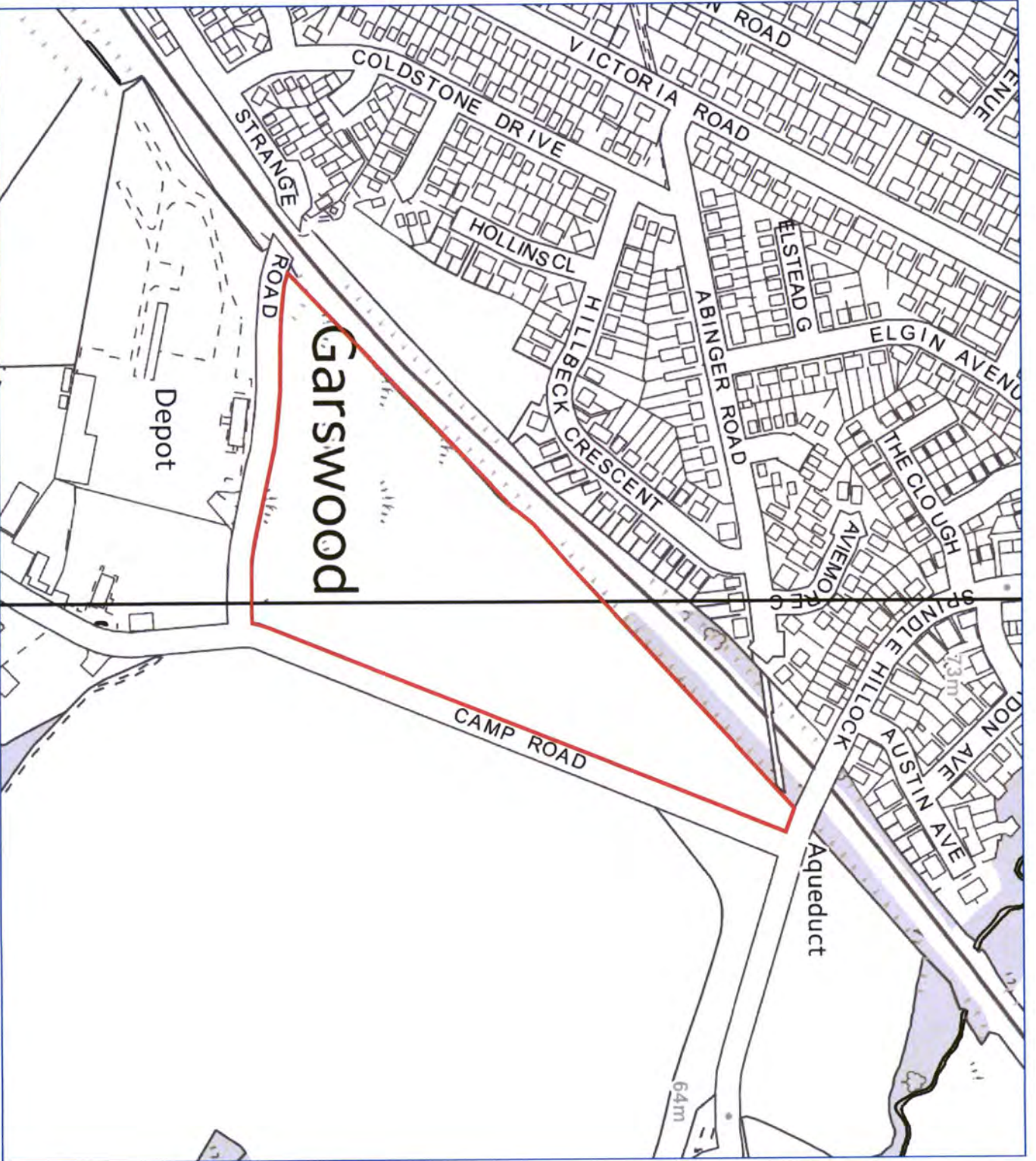
10. Appendices

EP1 - Location Plan


EP2 - Landscape, Ecology and Arboricultural Briefing Note (Ref: 10786/R02) (Tyler Grange)

EP3 - Highways Technical Note (Ref: DR/17022/TN02) (SCP)

EP1



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 Site Boundary



Project
 Land at Strange Road and Camp Road,
 Garswood, St Helens

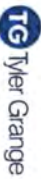
Drawing Title
 Site Location Plan

Scale
 As Shown (Approximate)

Drawing No.
 107986/P-12

Date
 January 2017

Checked
 HC/AL



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EP2

Land at Strange Road and Camp Road, Garswood, St Helens

Landscape, Ecology and Arboriculture Briefing Note (10786/R02)

1.0 Introduction

- 1.1. This report has been prepared by Tyler Grange LLP on behalf of Wainhomes (NW) following desktop analysis and preliminary fieldwork undertaken in January 2017.
- 1.2. The overview provides advice relating to landscape character and visual amenity, ecology and arboriculture matters at a high level to appraise the feasibility of the future residential development at land at Strange Road and Camp Road, Garswood, St Helens (hereafter referred to as 'the site').
- 1.3. The overview report does not constitute a full Landscape and Visual Appraisal (LVA) / Landscape and Visual Impact Assessment (LVIA) or BS5837:2012 Tree Quality Survey, nor is it a comprehensive assessment of ecology issues. It is intended that this work will inform potential development going forward and provide a review of the suitability of the land for release from the Green Belt.
- 1.4. The report should be read alongside the **Landscape Context Plan (10786/P05)**, **Landscape Photoviewpoints (10786/P06)**, **Landscape Opportunity and Constraints Plan (10786/P10)**, **Ecology Overview Plan (10786/P07)** and **Arboriculture Overview Plan (10786/P08)** that are included at the rear of this report.

2.0 Site Context

(See Landscape Context Plan 10786/P05)

- 2.1. The site is located at the south-eastern edge of Garswood, a large village in St. Helens. Garswood is located to the west of Ashton-in-Makerfield and lies approximately 5km north-east of St. Helens town centre.
- 2.2. The site is centred on OS grid reference SJ 55984 99557 and extends to approximately 4.3 hectares (11 acres). The site comprises two fields, one field of semi-improved grassland used for the grazing of horses and another which is an unmanaged area of dense scrub and ruderal vegetation with some scattered mature trees. Towards the northern part of the site, there are stable buildings and an area of hardstanding. The site is slightly higher to the north with a gradual reduction in elevation towards the south with the exception of an area of raised ground to the south west.
- 2.3. The site is bound to the north by Spindle Hillock, to the east by Camp Road, to the south by Strange Road and to the west by the Liverpool to Wigan railway line. Beyond the immediate

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site boundaries, the existing residential edge of Garswood lies to the west and land to the east is mainly arable farmland with field boundary hedgerows and woodland blocks. Land to the south is occupied by industrial units.

- 2.4. There are no Public Rights of Way within the site or with immediate connections to the site. The closest is Public Footpath SN918 which is located approximately 60m to the south east.

3.0 Landscape Context

(See Landscape Context Plan 10786/P05)

- 3.1. A site walkover survey was conducted on the 18th of January to assess the landscape character and visual amenity of the site. The weather was clear and suitable for the level of study undertaken for this report. A desktop study of available data sources was also undertaken of national and local landscape designations and policies. As stated above, this work does not constitute a full Landscape and Visual Appraisal (LVA) / full Landscape and Visual Impact Assessment (LVIA), but it does establish initial recommendations and conclusions associated with landscape matters.
- 3.2. The site has an urban fringe character due to its edge of settlement location south east of Garswood with direct visibility towards the current settlement edge of Garswood, in particular towards the houses along Hillbeck Crescent. The current land uses of horse grazing and scrub give the site a somewhat open character, however, the site is contained to the north west by the railway line and residential properties and to the south by industrial units.

Planning Policy

- 3.3. The site falls within the administrative borough of St. Helens and is subject to a Green Belt designation (Overall Spatial Strategy Policy S1 Green Belt and Rural St. Helens Policy CAS 5) within the St. Helens Council Local Plan Core Strategy (Adopted October 2012).
- 3.4. Local Policies relating to landscape character and visual amenity that will need to be considered as part of any site promotion / emerging development proposals include:

St. Helens Council Local Plan Core Strategy (Adopted October 2012)

- Policy CAS 5 Rural St. Helens;
 - Policy CP 1 Ensuring Quality Development in St. Helens;
 - Policy CQL 1 Green Infrastructure;
 - Policy CQL 2 Trees and Woodlands; and
 - Policy CQL 4 Heritage and Landscape.
- 3.5. CAS 5 policy coverage generally corresponds to the designated Green Belt and is restrictive with regards to development within the area it covers. In terms of landscape, part of this policy is to encourage the protection and enhancement of landscape character.
- 3.6. The remaining applicable landscape and visual related policies seek to ensure high quality development, the protection and enhancement of Green Infrastructure, trees and hedgerows, and the protection, conservation and preservation of St. Helens' landscape and historic character.
- 3.7. The relevant saved policies of the St. Helens Unitary Development Plan (1998) are listed below. These Saved Policies together with the Core Strategy Local Plan form the Development Plan for the Borough.

St. Helens Unitary Development Plan (1998) Saved Policies

- Policy: S 1 Green Belt;
 - Policy: GEN 6 Incidental Open Space Provision;
 - Policy: GB1 & GB2 General Criteria for Development Control Policy retained in the Green Belt;
 - Policy: ENV 1 Protection of Open Space; and
 - Policy: ENV 13 New Tree Planting on Development Sites.
- 3.8. Saved Policies S1, GB1 and GB2 provide Green Belt policy for St. Helens and set out the general criteria for development control of new development in the Green Belt. The remaining applicable landscape and visual related policies seek to provide and protect open spaces and ensure tree planting is included within new development.
- 3.9. In addition to the above policies, the following Supplementary Planning Documents (SPD), Supplementary Planning Guidance (SPG) and Evidence Base Documents also need to be taken into consideration:

Supplementary Planning Documents

- Trees and Development (June 2008)
- New Residential Development

Evidence Base Documents

- St. Helens Local Plan Draft Green Belt Review (2016)
- Strategic Housing Land Availability Assessment (SHLAA 2012 & 2016)
- St. Helens Council Open Space Assessment

Green Belt Context

- 3.10. A review of the site's performance and suitability for release from the Green Belt is summarised below in relation to the applicable principal Green Belt objectives as set out within the NPPF (the Framework) from a landscape perspective and in relation to the findings of the St. Helens Local Plan Draft Green Belt Review 2016. In the St. Helens Local Plan Draft Green Belt Review, the site is located within Green Belt Parcel GBP_029 and within this parcel, the site is located within Green Belt Site GBS_142.

To check unrestricted sprawl

- 3.11. The principal consideration here is the sprawl of the urban edge of Garswood eastwards. The site is located on the eastern residential edge of Garswood, east of the railway line and to the north of industrial estates. The site is bound to the east by Camp Road and to the south by Strange Road. Beyond these immediate boundaries, woodland blocks in adjacent fields provide further barriers to urban sprawl eastwards and the industrial units prevent further sprawl south. Therefore, development of the site is unlikely to impact upon the achievement of this Green Belt objective within the context of the wider Green Belt.
- 3.12. The St. Helens Local Plan Draft Green Belt Review describes the wider GBP_29 parcel as "*Well contained – more than 2/3 and strong boundaries to north, south, west and east,*" and the GBS_142 site itself as having "*Mature trees to north boundary, and western half of site contain various semi-mature trees.*" In combination, these descriptions indicate the parcel has strong boundaries which would prevent sprawl and the site has mature vegetation which could be retained and enhanced to reinforce boundaries and prevent future urban sprawl.

To prevent neighbouring towns merging into one another

- 3.13. The principal consideration here is the perceptual or physical coalescence of the settlements of Garswood to the west and Ashton-in-Makerfield to the east. In terms of the site, this is not a concern; development of the site would not result in the coalescence of these two urban areas due to the physical separation provided by intervening large fields to the east which contain densely wooded coverts and tree belts. Development of the site would not reduce the level of separation provided by these existing offsite landscape features.
- 3.14. The St. Helens Local Plan Draft Green Belt Review assesses the wider GBP_029 parcel as "high" in terms of overall significance and describes the parcel as a: "*strategic gap between Ashton-in-Makerfield and Garswood.*" However, within the review, the GBS_142 site, is described as having "*Good viability*" for development and in the summary of GBS_142, the site is described as "*Part of Green Belt parcel which is of high significance. The site is reasonably small and can be released without high impact.*". In combination, although the wider parcel GBP_029 performs an important role in the prevention of Garswood merging with Ashton-in-Makerfield, the GBS_142 site, within which the site is located, is relatively small and could be developed without high impact on the wider Green Belt parcel it is located within. Ultimately the M6 corridor provides the most robust boundary to contain Ashton-in-Makerfield to the east, and a considerable gap will still be maintained between the M6 and Garswood if the site is released from the Green Belt.

Safeguarding the countryside from encroachment

- 3.15. The principal consideration here is to prevent development encroaching upon the area of countryside around Garswood and Ashton-in-Makerfield and impacting upon its character and or reducing its visual amenity. Whilst the open and currently undeveloped nature of the site gives it a somewhat open character, the direct inter-visibility with the residential edge, the adjacent railway infrastructure and industrial units influences the character of the site and limits the extent to which the site can be considered rural or of a countryside character.
- 3.16. The St. Helens Local Plan Draft Green Belt Review, describes the wider GBP_029 parcel as "*bordered by busy M6, railway line and industrial estates and this has limited characteristics of countryside.*" Several of these characteristics were noted during the site visit within the area of the parcel the site is located within which reinforces the suggestion that the site is limited in the extent to which it can be considered as countryside in character.

Preserve the setting and special character of historic towns

- 3.17. Available information does not determine any specific role that the site plays in providing an important setting to Garswood. As always, aspects of this landscape are expected to be historic in origin, but no particularly rare or unique historic landscape features have been identified at this stage.
- 3.18. The St. Helens Local Plan Draft Green Belt Review does not assess the parcel against this purpose of the Green Belt.

Landscape Character Context

- 3.19. At the national level the site lies within the "Lancashire Coal Measures" Character Area (National Character areas 56); however, at the Borough level, and of greater relevance, the site lies within 'Character Type 3: Broad Rural Slopes Character Area 1: Arch Lane Slopes', which has the following key characteristics:
- "*Raised, gently undulating farmland with simple broad slopes of mostly southern aspect although in some instances the undulating landform can form a broad smooth ridgeline*

with slopes of a northern aspect. The elevation of slopes ranges between approximately 20-80 metres AOD which can enclose and contain surroundings lower landscapes;

- *Open views to the south especially to and over St Helens town, historic landmarks and industrial chimneys, although from the elevated ridgelines there is strong intervisibility with the immediate and wider landscape;*
- *Generally intact woodland blocks and shelterbelts. This creates a strong interplay of open to enclosed space. Variety of woodland character from mature broadleaved groups of woodland within fields to cloughs along narrow streams defining field edges, to geometric single-species, coniferous plantations, creating a mosaic of texture in this landscape;*
- *Landuse principally comprised of improved pastureland contained within structure of medium scale fields bounded by hedgerows with intermittent hedgerow trees. Pattern of field gives a strong rural character, which is heightened where the field pattern is regular running across the landscape grain and reinforcing the slope profile. Where the landform becomes more undulating the pattern of fields become more irregular and there is less repetition of hedgerow features;*
- *Settlement types vary in size but are typically of small villages at minor crossroads, or a scatter of farm steadings accessed off minor roads. In both instances the vernacular housing at the settlement core is of locally quarried blonde sandstone with slate roofs often associated with mature trees along the cartilage reinforcing the field pattern. Later infill housing is often poorly sited and the contemporary materials can be in contrast with the scale and materials of the vernacular housing. This contrast is further reinforced by incongruous curtilage design;*
- *A network of small 'B' roads cross landscape following contours the alignment reflecting the landscape grain. The roads have a minimal landscape impact with a narrow rural character enclosed by hedges limiting views and soft verges; and*
- *The strong rural character emphasises the physical separation of the landscape elevated above the adjacent urban landscape."*

3.20. The above local level landscape characteristics are broadly representative of landscape character elements in proximity of the site – such as the woodland blocks and medium scale fields located east of the site. However, the characteristics are less applicable to the site itself. In response to fieldwork and desktop research, further observations have been made with regards the site:

- Fields within the site are a mixture of semi-improved grassland and unmanaged scrub, small in size and irregular in shape;
- The topography varies between 63 and 72 metres AOD (Above Ordnance Datum). The highest point is located to the north west and there is general reduction in elevation southwards with the exception of an area of elevated land to the south west;
- Site boundaries vary. The southern boundary is formed by dense scrub and ruderal vegetation. The eastern and northern boundaries are formed by wooden post and rail fencing with fragmented sections of hedgerow vegetation with trees. The western boundary is formed by steel palisade fencing associated with the adjacent railway line behind which is a line of mature trees. The boundary between the two fields within the site is formed by wooden post and rail fencing;
- Features on-site include a small electrical substation, stables and associated areas of hardstanding and grazing horses;
- The site layout has remained broadly the same since the development of the railway line between 1849 and 1893;
- The settlement of Garswood to the west steadily developed after the development of the railway line with the majority of building occurring during the 1970s;
- The residential development along Hillbeck Crescent and Hollins Close is partially visible from the site;

- Industrial units located to the south of the site are partially visible from the site; and
- There are no Public Rights of Way within the site. The closest is Public Footpath SN918 which is located 60m south east of the site.

3.21. It is evident from fieldwork, that although the site is currently rural in nature owing to current land uses, it has become influenced by surrounding residential and industrial areas as well as the adjacent railway line. The relatively small size of the fields within the site compared to larger medium sized fields to the east of Camp Road running between these two areas limits the landscape connection between the site and the countryside to the east of Camp Road.

Visual Context

(See *Landscape Context Plan 10786/P05* and *Photoviewpoints 10786/P06*)

3.22. The site varies in terms of visual enclosure. The greatest level of enclosure is achieved to the south where mature dense scrub vegetation and a slight rise in topography limit views into and out of the site towards the south and west. The lowest level of visual enclosure is achieved towards the middle and north of the site where the topography is higher and there are large gaps in hedgerow vegetation along the eastern boundary permitting intervisibility between the site, Camp Road and Public Footpath SN918 to the south-east.

3.23. The approximate extent of the visual envelope (VE) is set out below:

- To the north – visibility towards the site is restricted by mature hedgerow vegetation between the site and Spindle Hillock (see **Photoviewpoints 5 and 6**). Visibility further to the north is filtered by the layering of intervening vegetation;
- To the east – views towards the site are possible from Camp Road which runs parallel along the eastern site boundary between the site and fields to the east (see **Photoviewpoint 4**). Views further east are possible along Public Footpath SN918 (**Photoviewpoint 3**) until a point where a rise in intervening topography limits views of the site;
- To the south – visibility towards the site is limited by dense scrub vegetation located on elevated land within the south west corner of the site. Towards the south-east corner, views are permitted between the site and Strange Road. Views further south are limited by industrial units located off Strange Road (See **Photoviewpoint 2**); and
- To the west – views towards the site from an area of open space off Hillbeck Crescent are limited by the railway line and the mature trees located along the line (See **Photoviewpoint 1**). Views further west are limited by the existing residential edges of Garswood along Hillbeck Crescent and Hollins Close.

3.24. Overall, the existing framework of site boundary vegetation, site topography and the adjacent built up edges result in the visual envelope being limited to the immediate surroundings. Even where more distant visibility towards the site is possible, such as along Public Footpath SN918, views of the site become largely obscured by intervening topography.

3.25. Potential visual receptors to development of the site include:

- Users of the Public Right of Way network, including Public Footpath SN918 which runs north west – south east to the south east of the site;
- Users of open space located west of site off Hillbeck Crescent;
- Private residents associated with the adjacent residential edge to the south (Hillbeck Crescent and Hollins Close); and
- Highway views from vehicular users of Camp Road, Strange Lane, Gibbon's Road and Low Bank Road.

3.26. It is evident that due to the visual context of the site and surrounding landscape, there are relatively few receptors that are likely to be impacted on and there is a limited visual relationship between the site and the wider Green Belt, despite the site's location on the settlement edge. There are opportunities to utilise the screening provided by the framework

of green infrastructure already present within the site to develop the site sensitively in a way which does not impact upon the perceived openness of the wider Green Belt between Garswood and Ashton-in-Makerfield.

- 3.27. A key consideration is the residential amenity of properties located along the existing settlement edge and the associated open space off Hillbeck Crescent. Their amenity will need to be respected through appropriate development offsets and the use of soft landscaping and screening where appropriate to ensure the new development occupying rising ground to the north of the site is not overbearing. Another key consideration is the visual amenity of the users of Public Footpath SN918 located to the south east of the site. The visual amenity of the users of this route should be considered with the use of soft landscaping, particularly to the south east of the site, which would filter views of the site from the footpath and would aid in integrating new development into the surrounding context and view.

Landscape Conclusions and Recommendations

(see *Landscape Opportunity and Constraints Plan 10786/P10*)

- 3.28. In response to the desktop and fieldwork undertaken, the following conclusions and recommendations are presented:

- The existing character of the site is rural owing to existing land uses. However, the site character is also heavily influenced by the surrounding urban context of residential development, industrial units and railway line infrastructure, which contribute to a more urban fringe character being evident on-site;
- The topography of the site varies and topography will be a key physical consideration in terms of site layout and design. Development should consider offsets and soft landscaping to the west to ensure any new development does not become overbearing within regards to the existing settlement edge and associated open space;
- In terms of boundaries, the railway line and roads form strong boundaries around the site in all directions and this means the site is relatively well-contained physically. In terms of visual containment, existing boundary vegetation should be retained and enhanced in order to reinforce visual containment of the site;
- In terms of visual receptors, there are two main receptors, namely residential properties and open space to the west and users of Public Footpath SN918 to the south east. The visual amenity of these receptors should be carefully considered in the development of the site; and
- In terms of Green Belt, when assessed from a landscape perspective, the site does not perform any Green Belt functions in terms of preventing settlements merging, preventing urban sprawl, or preventing encroachment on the countryside due to the strong physical and visual containment provided by the residential edge, industrial development and railway line adjoining the site. It is also not considered to have a role in preserving the historic setting of any settlements or landscape features. As such, development of the site would be unlikely to affect the integrity of the wider Green Belt.

- 3.29. In order to inform the quantum of the development the following recommendations are presented:

- The western edge of the site should be carefully considered with the potential incorporation of a development offset and low density development to enable the incorporation of mitigation planting in the form of filtering tree planting. This would ensure any new development occupying rising ground is not overbearing with regards to the existing residential edge and associated open space.
- Development should be focused towards the centre of the site where it would be less likely to be overbearing with regards to the existing settlement edge, and to enable the strengthening of existing planting along Camp Road;
- The existing boundary vegetation along Camp Road should be retained, strengthened and enhanced with new planting to aid the integration of new development on site into the wider landscape and to provide a robust boundary to contain the edge of the Green Belt; and

- The visual amenity of the users of Public Footpath SN918 should be considered through the integration of new soft landscaping to the south-east of the site to filter views of the site from the footpath and aid the integration of new development on site into the wider landscape.
- 3.30. Whilst it is appreciated that only a broad level assessment has been undertaken, this technical note has demonstrated that residential development within the site could be accommodated with reference to the site-specific conditions.
- 3.31. The site is considered capable of being developed without resulting in unrestricted urban sprawl or coalescence of urban areas. Although the site is currently open in terms of its use for horse grazing, urban influences are present in the form of views towards the adjacent residential edge, industrial sites and railway line.
- 3.32. As a result of the containment provided by the surrounding vegetation, built form and local topography, few receptors will be affected and the effects on landscape character will be localised.
- 3.33. The most likely adverse effects are deemed to relate to the change in views from the adjacent residential edge and associated open space to the west and views from Public Footpath SN918 located south east of the site. These will need to be sensitively considered as part of future design proposals for the site, with development offsets, appropriate screen planting and the provision of new soft landscaping.
- 3.34. With the above conclusions taken into account and with respect to landscape and visual matters, this site should therefore be considered suitable for residential development and release from the Green Belt.

4.0 Ecology Context

- 4.1. A site walkover survey was conducted on the 18th January 2017 by Hayley Care, an experienced field ecologist and Associate member of Chartered Institute of Ecology and Environmental Management (CIEEM).
- 4.2. The methods used during the walkover survey broadly followed methods used in an 'extended' Phase I habitat survey. The technique is based upon Phase I survey methodology (JNCC, 2010). This 'extended' Phase I technique provides an inventory of the habitat types present and dominant species.
- 4.3. The weather was dry and overcast (100% cloud cover), relatively mild (10°C) and calm (Beaufort scale 0).
- 4.4. It is important to note that the walkover was undertaken in a sub-optimal time of year for the assessment of vegetative composition, and some plants may be missed due to seasonal dieback. However, for the purposes of this report it is considered that the survey effort would flag up any potential ecological matters that would require further investigation if the site is taken forward for planning.
- 4.5. A desk based data search was also conducted. The aim of the data search is to collate existing information about statutory and non-statutory sites which are present close to the site.
- 4.6. The data search has been undertaken for a 10km radius around the site for European statutory sites, a 2km radius for national statutory sites and non-statutory sites.

- 4.7. No protected or priority species records have been collated at this point.

Planning Policy & Legislation

- 4.8. This section briefly summarises the legislation and local planning policies, relevant to the baseline ecology results.

Legislation

- 4.9. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:
- The Conservation of Habitats and Species Regulations 2010
 - The Wildlife and Countryside Act 1981 (as amended)
 - The Countryside and Rights of Way Act 2000
 - The Natural Environment and Rural Communities Act 2006
 - The Hedgerows Regulations 1997
 - The Protection of Badgers Act 1992
- 4.10. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2010 (as amended).
- 4.11. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.
- 4.12. The Countryside and Rights of Way Act 2000 (CROW) strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.
- 4.13. Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 lists UK priority species and habitats subject to conservation action and are referred to as Species of Principal Importance (SoPIs) or Habitats of Principal Importance (HoPIs). Section 41 of the NERC Act states that local planning authorities must have regard for the conservation of both SoPIs and HoPIs.
- 4.14. The Protection of Badgers Act 1992 consolidates the previous Badger Acts of 1973 and 1991. The legislation aims to protect the species from persecution, rather than being a response to an unfavourable conservation status. As well as protecting the animal itself, the 1992 Act also makes the intentional or reckless destruction, damage or obstruction of a badger sett an offence. A sett is defined as 'any structure or place which displays signs indicating current use by a badger'. In addition, the intentional elimination of sufficient foraging area to support a known social group of badgers may, in certain circumstances, be construed as an offence by constituting 'cruel ill treatment' of a badger. Badgers are not the subject of conservation action.

Planning Policy

- 4.15. Local Policies relating to ecology that will need to be considered as part of any site promotion/emerging development proposals include:

St. Helens Core Strategy (adopted October 2012)

- CP1 'Ensuring Quality Development in St Helens' - safeguards and enhancement of GI and biodiversity;
- CQL 1 'Green Infrastructure';
- CQL 2 'Trees and Woodland' - protecting and safeguarding trees, woodland and hedgerows;
- CQL 3 'Biodiversity and Geological Conservation' - protecting and managing species and habitats and creation of habitat and linkages; and
- CAS 5 'Rural St. Helens' - Protect, manage and enhance biodiversity and create opportunities for biodiversity.

Saved Policies of 1998 Unitary Development Plan (UDP) (saved September 2007)

- ENV3 Greenways
- ENV4 'Statutory Site Protection'
- ENV5 'Sites of Community Wildlife Interest & Local Nature Reserves'
- ENV12a and 12b 'Development Affecting Existing Trees'
- ENV13 'New Tree Planting on Development Sites'

St. Helens Council LDF Supplementary Planning Documents

- Biodiversity (adopted June 2011)

Statutory Protected Sites

- 4.16. There are no European or nationally designated statutory sites present within the study area.

Non-Statutory Protected Sites

- 4.17. Five non-statutory sites, known as Local Wildlife Sites (LWSs) in St Helens, are present within the search area. Details of these sites are given in Table 4.1 below:

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Summary of Reason for Designation
Mine Spoil West of Weathercock Hill	LWS	1.5km W	Broadleaved woodland, bare ground and grassland.
Plantation Copse and Ponds, Haydock	LWS	1.5km SE	Broadleaved woodland with ponds and open grassland.
Barton Clough, Billinge	LWS	1.6km NW	Broadleaved woodland with Down Brook running throughout.
Haydock Cross	LWS	1.7km SE	Broadleaved woodland.

Goyte Hey Wood	LWS	2km SW	Broadleaved woodland adjacent to Plantation Copse and ponds LWS.
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Table 4.1: Non-statutory designated sites within 2km of the site.

- 4.18. Given the small size of the site, quantum of development achievable on the site, the residential nature of development proposals and the distance between the site and non-statutory designations, it is unlikely that the development would lead to any significant impacts on protected sites within the search area, from factors such as increased recreational use of publicly accessible nature conservation designations.

Habitats

Building, Hardstanding and Fencing

- 4.19. A stable block is present in the northeast part of the site surrounded by hardstanding. Wooden post and rail fencing is present bounding pasture fields and the yard area.

Semi-improved Grassland

- 4.20. The northern half of the site comprises approximately 2.6ha of semi-improved grassland managed as horse pasture and is currently closely grazed by horses.

Scrub and Ruderal Mosaic

- 4.21. The southern half of the site comprises a raised area of unmanaged scrub and ruderal vegetation which is developing into emergent woodland. The mosaic comprises a mixture of tall ruderal species including bramble *Rubus sp.*, willowherb *Epilobium sp.*, teasel and hogweed *Heracleum sp.* and a variety of tree species including birch *Betula sp.*, elder *Sambucus nigra*, alder *Alnus glutinosa*, ash *Fraxinus excelsior*, hazel *Corylus avellana*, hawthorn *Crataegus monogyna* and oak *Quercus sp.*

- 4.22. This area, although unmanaged, is well established, creating a dense pocket of vegetation in a raised area that is flanked by an industrial complex, horse pasture and arable fields. It would be unable to be replaced in the short to medium term and it also connects to the mature tree belt that lines the railway along the north-western site boundary.

- 4.23. Although not a priority, if any of this scrub can be retained within the development proposals, there is an opportunity for enhancement by bringing this habitat into active management, strengthening and developing the emerging woodland cover and mosaic habitats.

Hedgerow

- 4.24. A species poor hedgerow is present along the northern and eastern site boundary. It comprises intact and defunct sections and is dominated by hawthorn with occasional holly *Ilex aquifolium*, sycamore *Acer pseudoplatanus*, oak and ash. As it lines the roadway and adjacent pavement, it shows signs of management through flail cutting.

- 4.25. Hedgerows are a UK priority habitat and they should be retained within development designs. There is also opportunity for enhancement through strengthening by gapping up defunct sections with a mix of native species of local provenance.

Areas of Inundation

- 4.26. Two areas of inundation are situated at the base of the incline within the scrub and ruderal mosaic lining the fence that crosses the centre of the site. These areas were damp and shallow during the survey with pooling water where it was less overgrown. Reed canary grass

Phalaris arundinacea covered much of these areas together with compact rush *Juncus conglomeratus*, with more ruderal species encroaching.

Invasive Flora

- 4.27. The invasive Japanese knotweed *Fallopia japonica* is also present on the northern edge of the scrub and ruderal mosaic (see TN1 on ecology overview plan **10786/P07**). As a species listed under Schedule 9 of the WCA it will need controlling to ensure that it does not spread.

Offsite Habitats

- 4.28. The railway line runs along the northwest site boundary with a mature tree line and bramble scrub present along the banks. These trees are mature and should be protected from development impacts, therefore a buffer may be required to those close to the site boundary to ensure that the root protection areas (RPAs) are protected.
- 4.29. There are three ponds within 250m of the site to the south and southwest of the industrial estate, with at least one further pond within 500m to the south of the site. Although these ponds will not be affected by the development they may provide suitable great crested newt (GCN) *Triturus cristatus* habitat which may have an implication for development of the site (see paragraphs relating to GCN below).

Fauna

Badger

- 4.30. No evidence of badger *Meles meles* such as latrines, hairs, prints or setts was recorded during the survey. The site does support some potential habitat for foraging and sett building, particularly within the scrub/ruderal mosaic to the south and along the railway embankment along the western boundary.
- 4.31. As badger can quickly excavate new setts, it is recommended that a badger survey is conducted prior to any development of the site to ensure their continued absence from the site.
- 4.32. Should a badger sett be found within the site prior to the commencement of works, it may be necessary to either provide a suitable buffer (up to 30m) to the sett or to close off the sett entirely, if providing a buffer is considered impractical. A licence from Natural England will be required for sett closure works.
- 4.33. It is considered that if badgers are found to be using the site for foraging that there is adequate foraging habitat within surrounding areas and no mitigation would be required.

Bats

- 4.34. The majority of trees on site are not considered sufficiently mature to provide bat roosting opportunities, however, any tree requiring removal should be subject to a thorough ground-based assessment for its potential to support roosting bats. The stable block building present within the northeast of the site could also support features that could be used by roosting bats and will need to be inspected in more detail if it is to be affected by development (either structurally or through a change in lighting conditions).
- 4.35. The site is likely to be used by foraging and commuting bats as the vegetation cover, tree lines and inundation areas present are likely to provide an abundance of invertebrates. A search of local ecological records should be undertaken to see if there are any occurrences of bat roosts locally and a bat activity survey would likely be required to inform a planning application.

Birds

- 4.36. The trees, hedgerows and dense scrub within the site is likely to provide nesting and foraging habitat for a range of common woodland species. This could include priority species such as dunnock *Prunella modularis* and song thrush *Turdus philomelos*. The building on site could also be used by nesting species.
- 4.37. As the grassland areas is relatively small, heavily grazed and regularly disturbed by human activity, it is unlikely that it would be used by ground nesting birds such as skylark *Alauda arvensis* or overwintering bird populations of any significance.
- 4.38. All wild birds, their nests and eggs are afforded protection under the WCA 1981 (as amended). As such the removal of woody vegetation or structures during the bird breeding season could trigger this legislation, which protects birds while actively nesting. Development proposals should therefore include measures for timing vegetation clearance and demolition works to avoid the bird breeding season where possible, or other measures to avoid disturbance to breeding birds where works have to proceed whilst birds are likely to nesting.

Great Crested Newt and other amphibians

- 4.39. There are two areas of inundation within the ruderal and scrub mosaic in the south of the site which, when holding water, could provide aquatic and breeding habitat for GCN.
- 4.40. There are three ponds within 250m (100m, 170m and 195m south and southwest) and one pond within 500m of the site (400m south). Optimal terrestrial habitat for GCN is present within the site in the form of scrub and ruderal vegetation mosaic and along hedgerows and tree lines around the site's boundaries. Although the offsite ponds are not directly adjacent to the site, they do have habitat connections through wooded areas and tree lines along the railway line which would facilitate GCN access onto the site if present. All of these ponds and the inundation areas have the potential to support great crested newt *Triturus cristatus* (GCN) and other common amphibians such as common frog *Rana temporaria* and common toad *Bufo bufo* (a species of principal importance).
- 4.41. It is therefore recommended that a full GCN survey is conducted on the ponds present within 250m, to inform whether GCN are present, whether they are likely to be using the site and what, if any, mitigation is required for GCN.
- 4.42. If GCN are found within the proximity of the site, the required mitigation will likely reduce the quantity of development achievable at the site, although the exact amount of mitigation would depend on the population size found.

Reptiles

- 4.43. The more open areas within the scrub and ruderal mosaic on site is considered suitable for reptiles. However, this area is relatively small and could be quite shaded when the trees are in leaf, which could reduce its suitability. A search of local ecological records should be undertaken to see if there are any occurrences of reptiles locally. Consultation with the local planning authority ecologist should be undertaken to discuss whether surveys for reptiles would be required to inform a planning application.

Water Vole

- 4.44. Although the ruderal vegetation and inundation areas could have some limited potential to provide habitat for water vole *Arvicola amphibius*, there are no ditches or running water in the site or nearby and therefore it is unlikely that they would be present.

Ecology Conclusions and Recommendations

- 4.45. It is considered that residential development could be accommodated within the area currently managed as horse pasture within the site. However, it is recommended that the scrub and ruderal mosaic in the southern half of the site and hedgerows present along site boundaries are retained as far as possible, enhanced and brought into management as part of the site's green infrastructure.
- 4.46. In line with National Planning Policy Guidance it is recommended that a full data search, including the purchase of species records is undertaken alongside surveys for badger, bats, GCN and potentially reptiles are undertaken to inform any future planning application.
- 4.47. Mitigation in respect of badgers and bats can normally be easily accommodated within green infrastructure proposals for development but it is considered that GCN (if present) may affect the quantity of development that can be achieved. If reptiles are present then measures to ensure their protection during construction should be employed, however, providing the scrub and mosaic habitat is retained then it is not thought that any additional areas of the site would be required for mitigation.
- 4.48. Overall, with appropriate mitigation, development would still be able to accord with planning policies and legislation relating to wildlife (see policy CQL 3).
- 4.49. There is opportunity to enhance the site for biodiversity in line with the NPPF and local policies (CP1, CQL 1, CQL 2, CAS 5 and ENV13) within green infrastructure, bringing the scrub ruderal mosaic into management and gapping up and strengthening the retained hedgerow boundaries.

5.0 Arboricultural Context

- 5.1. A site walkover was undertaken on 18th January 2017 to review the arrangement, quality and condition of existing tree and hedgerow cover on-site. As stated above, this work does not constitute a full BS5837:2012 Tree Quality Survey, but it does establish the broad distribution and associated development implications associated with arboricultural matters.
- 5.2. The appraisal of trees has been guided by the 'Cascade Chart for Tree Quality Assessment' within Table 1 of BS5837:2012. Categories A, B and C deal with trees that should be a material consideration in the development process. The BS5837:2012 category grading is summarised as:
- **Category Grading A:** Trees of high quality and value, which are in such a condition as to be able to make a substantial contribution from an arboricultural, landscape or cultural perspective;
 - **Category Grading B:** Trees of moderate quality and value, which are in such a condition as to make a significant contribution from an arboricultural, landscape or cultural perspective;
 - **Category Grading C:** Trees of low quality and value, which are currently in adequate condition to remain until new planting could be established or young trees with a stem diameter below 150mm; and
 - **Category Grading U:** Trees which are in such a condition that any existing value would be lost within 10 years and which should, in the current context, be removed for reasons of sound arboricultural management.

- 5.3. The comments made are based on observable factors present at the time of inspection. No tree is entirely safe given the possibility that exceptionally strong winds could damage or uproot even a mechanically 'perfect' specimen. Although the health and stability of trees in their current context is an integral part of their suitability for retention, it must be stressed that this report is not a tree risk assessment and should not be construed as such. It may also have not been appropriate, or possible, to view all parts or all sides of every tree to fulfil the assessment criteria of a risk assessment.
- 5.4. Any recommendations made for management of the trees (e.g. tree works) prior to the proposed development are not a detailed 'specification' for tree work and should not be considered as such. These recommendations are proposed on the basis that they are advised and undertaken by a qualified arboricultural contractor working in accordance with best practice as, for instance, embodied in BS3998:2010 Recommendations for Tree Work, or in the European Tree Pruning Guide, published in 2001 by the Arboricultural Association and who should be listed in the Arboricultural Association's Approved Contractors Directory www.trees.org.uk.
- 5.5. A lack of recommended work for the wider tree stock does not imply that a tree does not pose an unacceptable level of risk and, likewise, it should not be implied that a tree will present an acceptable level of risk following the completion of any recommended work.
- 5.6. This section should be read in conjunction with the **Arboriculture Overview Plan (10786/P08)** that is included at the rear of this report. The illustrated locations of trees are informed by OS Mapping and Aerial Imagery. A topographical survey was unavailable at the time of the site visit and therefore the locations of trees should be considered as indicative only at this stage.

Planning Policy

- 5.7. Under the Town and Country Planning Act 1990 (as amended) the requirement to consider trees as part of development is a material planning consideration and will be taken into account in the determination of planning applications.
- 5.8. The local policies relating to arboriculture, namely addressing existing tree and woodland stock that will need to be considered as part of any site promotion/emerging development proposals include:
- St. Helens Core Strategy (adopted October 2012)
- CP1 'Ensuring Quality Development in St Helens' - safeguards and enhancement of GI and biodiversity;
 - CQL 1 'Green Infrastructure'; and
 - CQL 2 'Trees and Woodland' - protecting and safeguarding trees, woodland and hedgerows.
- 5.9. Policy CP1 includes a requirement to "*Safeguard and enhance Green Infrastructure, biodiversity and geodiversity and bring these resources into positive management*" and to "*Avoid unnecessary tree loss and make provision for new and replacement planting*".
- 5.10. Further emphasising the requirement to retain and enhance existing vegetation, Policy CQL 1 states that "*The Council will protect, manage, enhance and where appropriate expand the Green Infrastructure network*" adding that this will be undertaken by seeking to "*Reinforce the protection of greenways and linkages between sites*".
- 5.11. Policy CQL 2 requires developers to "*plant new trees, woodlands and hedgerows on appropriate sites or contribute to off site provision and elsewhere support new planting*" and

also seeks the "Conserving, enhancing and managing existing trees, woodlands and hedgerows".

- 5.12. The policy adds that "Where trees are justifiably lost the replacement of trees will be required on at least a 2 for 1 ratio".

Saved Policies of 1998 Unitary Development Plan (UDP) (saved September 2007)

- ENV 11 'Tree Surveys'
 - ENV 12A and 12B 'Development Affecting Existing Trees'
- 5.13. Policy ENV 11 sets out the requirement to undertake a tree survey "where a proposal affects a site containing existing trees or woodlands", "to enable the effect of the development on the trees to be properly assessed".
- 5.14. Policy ENV 12A states that "proposals affecting existing trees and woodlands would not normally be permitted if they would result in significant loss of trees; do not incorporate measures for the successful retention of existing trees; and do not make adequate provision for replacement planting to compensate for any losses as a result of development".
- 5.15. Policy ENV 12B reaffirms the Council's requirement to replace lost tree and woodland stock on "at least a 2:1 basis, either within the development site, or in a suitable area nearby, under an agreement between the Council and the developer".
- 5.16. Policy ENV 12B also provides more generalised design advice relating to tree stock, stating that "the Council may impose conditions requiring layouts to provide adequate spacing between existing trees and buildings, taking into account the existing and potential size of trees and their impact both above and below ground level".
- 5.17. Applicable St. Helens Council LDF Supplementary Planning Documents include:
- Biodiversity (adopted June 2011)
 - Design Guidance (adopted September 2007)
 - Trees and Development (adopted June 2008)
- 5.18. The above documents promote the protection, retention and conservation of existing vegetation to address biodiversity and green infrastructure enhancements.

Statutory Protection

- 5.19. As confirmed via telephone on 20th January 2017, St Helens Council have stated that there are no Tree Preservation Orders (TPOs) on or adjacent to the site. No trees on or within influence of the site are located within a Conservation Area.
- 5.20. There are no identified Ancient Woodlands within or adjoining the site (as shown at www.magic.gov.uk, accessed on 23rd January 2017).

Existing Tree Cover

- 5.21. Tree and hedgerow cover is limited to the site boundaries. The site is bound to the east by a defunct and species poor roadside hedgerow, dominated by hawthorn *Crataegus monogyna* with occasional sycamore *Acer pseudoplatanus*, holly *Ilex aquifolium*, oak *Quercus sp* and ash *Fraxinus excelsior*. Given the gappy form, extensive deadwood, bramble cladding, tracts of scrub and roadside influence, such hedgerow cover is considered to be of generally low arboricultural quality (Category C) but with some collective merit where there is a screening function with sections left to establish to a height of 3 to 4m.

- 5.22. The western site boundary is aligned by a belt of off-site rail line embankment tree cover beyond a line of palisade security fencing. With mixed maturity, the tree belt broadly comprises high canopy cover, interspersed with occasional pockets of self-seeded understorey shrubby trees. Species present include hawthorn, ash, oak, sycamore and birch *Betula sp.* As a cohesive screening belt there is a collective moderate (Category B) value to the western boundary stock, although it will be important to survey the condition and height of specimens in detail to establish appropriate development offsets. A detailed topographic survey and further site measurements will also be required to denote the detailed root protection areas along this boundary given the mix of young and mature trees. The tree belt is notably weaker to the north with gaps present throughout.
- 5.23. Within the south-western corner of the site, west of the pastoral field and timber fence line which traverses the site, lies a dense mosaic of wetland scrub, self-seeded trees, pockets of mature specimens and a compact wooded band of young to early mature alder *Alnus glutinosa*, hazel *Corylus avellana*, blackthorn *Prunus spinosa*, birch and sycamore with scattered older oak trees present. Naturalised in form, there is a collective moderate to high arboricultural value as a wooded screen, but much of the grouping is individually poor where younger self-seeded vegetation has yet to become established as notable features of arboricultural value.

Arboriculture Conclusions and Recommendations

Quality and Condition

- 5.24. Trees are classified with reference to BS5837:2012 criteria to reflect the mixed quality and value of the existing site boundary tree stock. There is a moderate collective value to the linear belts of site boundary hedgerow and tree stock, forming tracts of screening vegetation in varying states of connectivity and condition, but trees and hedgerow stock is individually of a lower quality and there is scope for selected removals and replacements if required. The dense mounded wooded area across the south-western reaches of the site is in a naturalised and unmanaged condition where there is scope for retention of pockets of mature cover and enhancement via remedial woodland management to improve the habitat value and condition of this arboricultural resource if possible in conjunction with accommodating development.
- 5.25. Category A trees are denoted by a Green canopy outline on the Arboriculture Overview Plan (10786/P08). Category A trees signify those that provide high arboricultural value to the site and its locality and that which must be accommodated and safeguarded on-site as a priority.
- 5.26. Category B trees are denoted by a Blue canopy outline on the Arboriculture Overview Plan. Category B trees signify those that provide moderate arboricultural value to the site and its locality and that which should be accommodated on-site where appropriate.
- 5.27. Category C trees are denoted by a Grey tree outline on the Arboricultural Overview Plan. Such trees provide limited or transient arboricultural benefits which may be readily replaced. They are of less priority in terms of retention and subsequently represent a minimal constraint in the context of development.

Root Protection Areas and Associated Development Offset Requirements

- 5.28. Mature trees of merit along the site boundaries will require a development offset in accordance with calculated Root Protection Areas (RPAs). A detailed BS5837 Tree Quality Survey will establish the location of larger trees and associated RPAs once a measured topographic survey of the site, mapping tree stem locations, is available. The RPAs are considered to contain sufficient rooting volume to ensure the survival of the tree and should be left undisturbed in order to avoid damage to the roots or rooting environment surrounding the tree. Particular care is needed regarding the proximity of trees which may become enclosed within new development.

- 5.29. Where any construction activity within or adjacent to RPAs is unavoidable or where works are to be undertaken in close proximity to lower lying canopies, appropriate working methods, including tree protection and signage will need to be sought as a matter of detailed design in order to safeguard trees during the construction phase of the development.
- 5.30. Whilst a BS5837:2012 Tree Quality Survey will address the definitive RPA extents for all trees within and adjacent to the site measuring over 75mm diameter at breast height (dbh), an indication of the likely development offset requirements for existing trees is included on the Arboriculture Overview Plan included to the rear of this report.

Tree Canopy Shading and Associated Development Offset Requirements

- 5.31. Where high canopy trees are present on and adjacent to sites such as this, the RPAs and below ground context of trees should also be considered in association with above ground constraints. The current and ultimate height of any tree also needs to be appreciated in terms of its size, dominance, shade and movement in strong winds. An indication of the likely development offset requirements pertaining to tree canopy shading and associated residential amenity matters is included on the Arboriculture Overview Plan included to the rear of this report.
- 5.32. Proposed habitable rooms and garden areas will need to be sited to avoid the principle shadowing constraints to reduce tree resentment issues and adverse residential amenity impacts for future site occupants. Retained mature tree cover of merit must also be located outside of proposed gardens to ensure future retention and appropriate management.

Management

- 5.33. There is scope for enhancing the eastern roadside boundary to improve the degree of enclosure, species and age diversity whilst improving the level of habitat connectivity across the site boundary by re-stocking the hedgerow to plug gaps and supplement stands of deadwood by planting up with native hedgerow standards of local provenance and increasing the presence of shade tolerant holly to offer evergreen cover.
- 5.34. Within the south western wooded area, a long-term program of selective thinning and coppicing of woody vegetation (where retained) as part of an integrated management plan for the development proposals would provide a diversity in the age of tree stock, promote tree growth and result in structural diversity, as well as opening up areas that are currently shaded to encourage diversity in ground flora. Removal of non-natives and/or invasive species and some native planting of species of local provenance coupled with the targeted reduction in sycamore may also be appropriate.

Summary

- 5.35. Should the site be considered for a future planning application the implementation of a BS5837:2012 survey and assessment work will likely be required for compliance with local planning policy and validation purposes. This work will provide greater detail on the above and below ground characteristics of trees, including their constraints and opportunities in the context of development proposals. A full BS5837:2012 Tree Quality Survey will need to be based on measured topographic survey data in order to obtain accurate locations of trees, detailed measurements of tree canopies, root protection areas (RPAs) and cast shading.
- 5.36. Future development on-site is considered feasible at this stage, but would be limited by the preference to accommodate the stand of scrubby woodland vegetation across the south-western corner of the site. There is an opportunity to utilise this space for habitat and public open space provision, although remedial management and selected thinning would be appropriate to achieve this and clearly this will need to fit with the development proposals. Off-site tree stock is also likely to cast shading across the north-western reaches of the site given the presence of high canopy rail line embankment stock, otherwise there is no overarching

arboricultural constraint to development where vegetation can be accommodated at the site boundaries and referenced by way of suitable development offsets.

6.0 Overall Recommendations and Conclusions

- 6.1. It is considered that an appropriate residential development could be accommodated within the site, incorporating a number of measures to ensure that development would be in keeping with the surrounding landscape and townscape character whilst limited visual impacts and addressing the existing ecological and arboricultural baseline.
- 6.2. A summary of the principle findings is set out below:
- In terms of Green Belt, when assessed from a landscape perspective, the site does not perform any Green Belt functions in terms of preventing settlements merging, preventing urban sprawl, or preventing encroachment on the countryside, nor does it have a role in preserving the historic setting of any settlements or landscape features. Development of the site would be unlikely to affect the integrity of the wider Green Belt.
 - The site is considered capable of being developed without resulting in unrestricted urban sprawl or coalescence of urban areas. Although the site is currently open in terms of its use for horse grazing, urban influences are present in the form of views towards the adjacent residential edge, industrial sites and railway line;
 - As a result of the containment provided by the surrounding vegetation, built form and local topography, few receptors will be affected and the effects on landscape character will be localised;
 - The most likely adverse effects are deemed to be related to the change in views from the adjacent residential edge and associated open space to the west and views from Public Footpath SN918 located south east of the site. These will need to be sensitively considered as part of future design proposals for the site, with development offsets, appropriate screen planting and the provision of new soft landscaping;
 - Existing trees are recommended to be excluded from proposed private gardens and root protection areas surveyed in detail and referenced in the layout across the edges of the site to ensure that on-site development does not impact upon adjacent tree stock which is to be retained;
 - The existing eastern boundary hedgerow should be retained and re-stocked to plug gaps and to enhance the species composition and age diversity;
 - A full data search (to include the purchase of species records) and protected species surveys will be required for the following species / faunal groups in order to inform what, if any, mitigation and compensation may be required to facilitate development:
 - Badger;
 - Bat roost surveys;
 - Bat activity survey;
 - Great crested newt surveys;
 - Reptiles; and
 - Mapping of invasive species (Japanese knotweed).

- It is recommended that the scope of further ecology surveys is agreed with the LPA ecologist;
- Mature trees should be retained and protected within the naturalised woodland area. There is scope for enhancements across the wooded area where poorer quality, scrub-clad and self-seeded vegetation could be thinned and enhanced via management to offer an improved woodland structure within a development layout; and
- Development parameters will need to consider the future growth requirements of retained tree stock and incorporate the canopy shade implications to ensure adverse residential amenity impacts are reduced across the periphery of the development.

6.3. With the above conclusions taken into account and with respect to landscape and visual, ecological and arboricultural matters, this site should therefore be considered suitable for residential development and release from the Green Belt.

7.0 Plans and Photoviewpoints

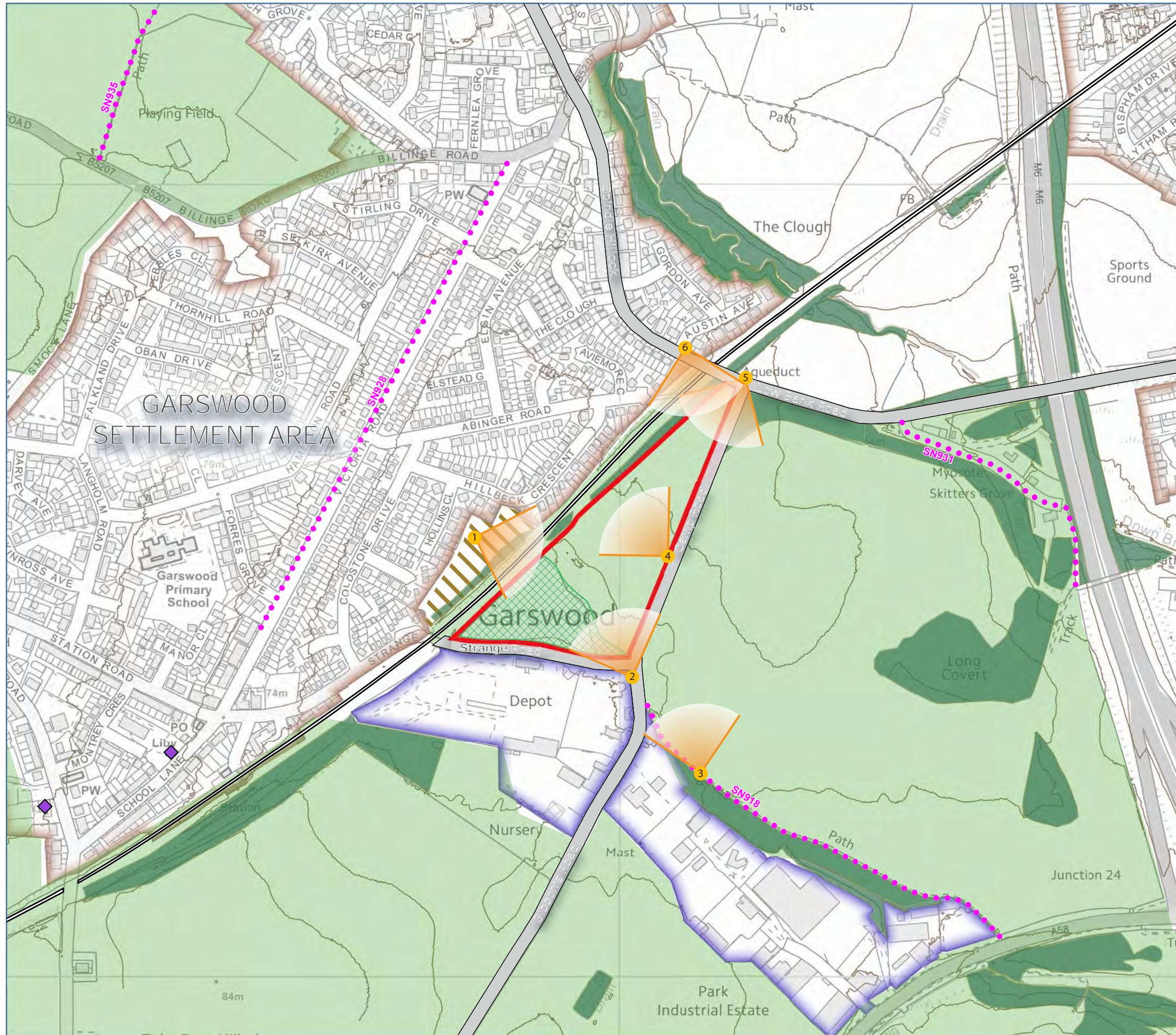
Landscape Context Plan
(10786/P05)

Photoviewpoints 1-6
(10786/P06)

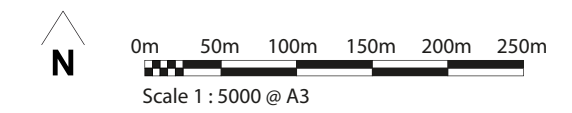
Ecology Overview Plan
(10786/P07)

Arboriculture Overview Plan
(10786/P08)

Landscape Opportunity and Constrains Plan
(10786/P10)



- Site Boundary
- Photoviewpoint Location
- Local Authority Policies**
Data plotted from the St. Helens Unitary Development Plan (1998)
- Green Belt
Policies S1, GB1 & GB2
- Open Space
Policies ENV1
- Designations and Listings**
Data plotted from <http://www.magic.gov.uk/MagicMap.aspx>
- Listed Buildings
Grade II
- Public Rights of Way**
Data plotted is public sector information released by the Council of St. Helens under the Open Government Licence.
- Public Footpath
- Landscape Elements**
Data plotted from desktop study and field work observations
- Existing Urban Edge
- Industrial Sites
- Key Roads
- Railway Line
- Dense Scrub Vegetation
- Existing Woodland
- Contours - 5m Intervals



Project Land at Strange Road and Camp Road, Garswood, St. Helens

Drawing Title **Landscape Context Plan**

Scale 1 : 5,000 @ A3

Drawing No. 10786/P05

Date January 2017

Checked LHM/AL



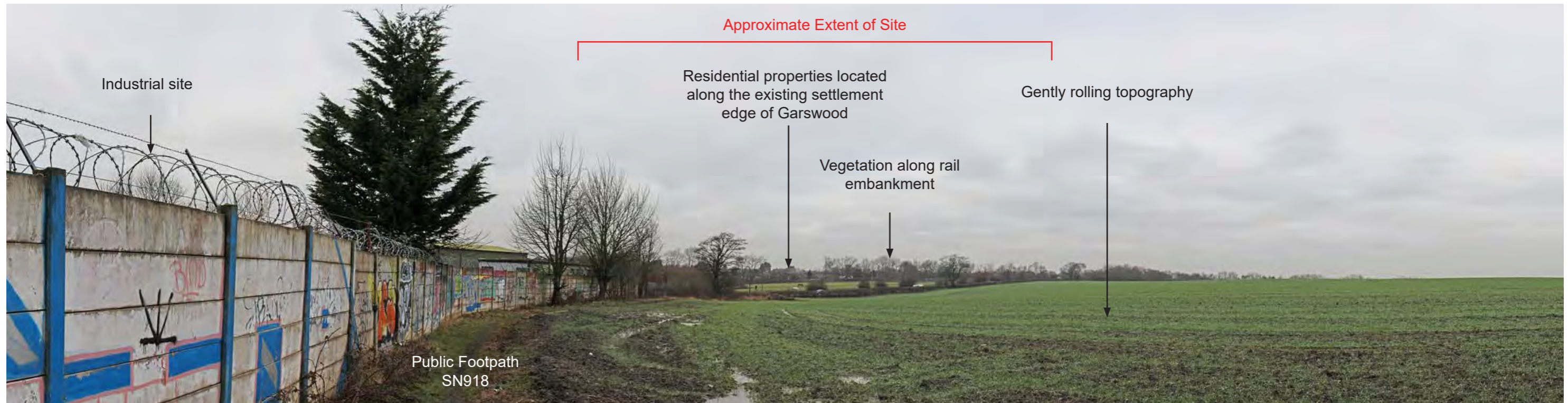
Ladyfield House, Wilmslow, Cheshire, SK9 1BB
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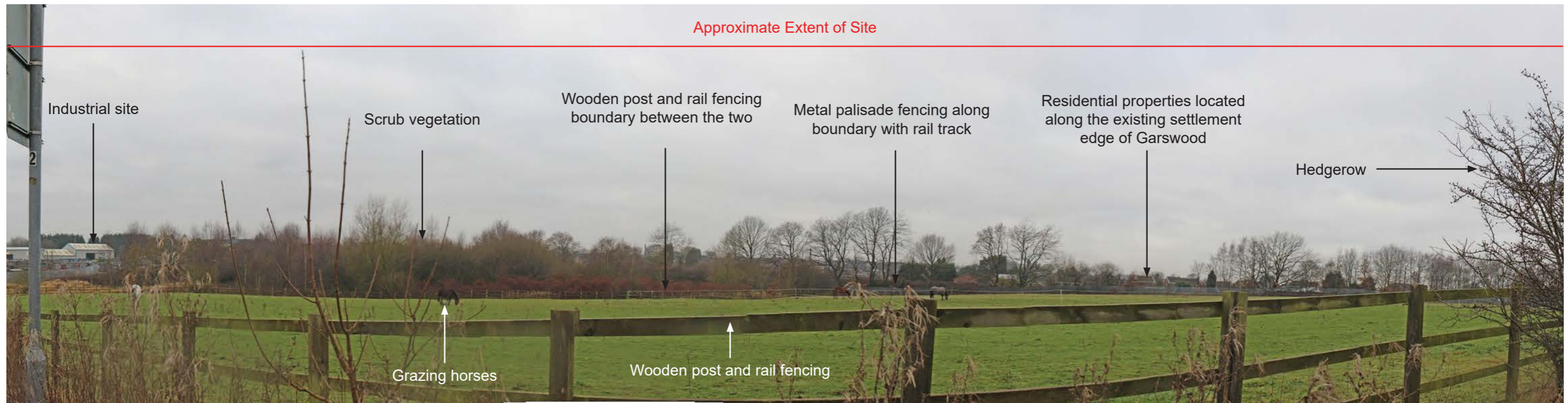
Photoviewpoint 1:	Taken from open space off Hillbeck Crescent.	Distance from Site:	73m	Orientation	East	Coordinates:	X:355816, Y:399555
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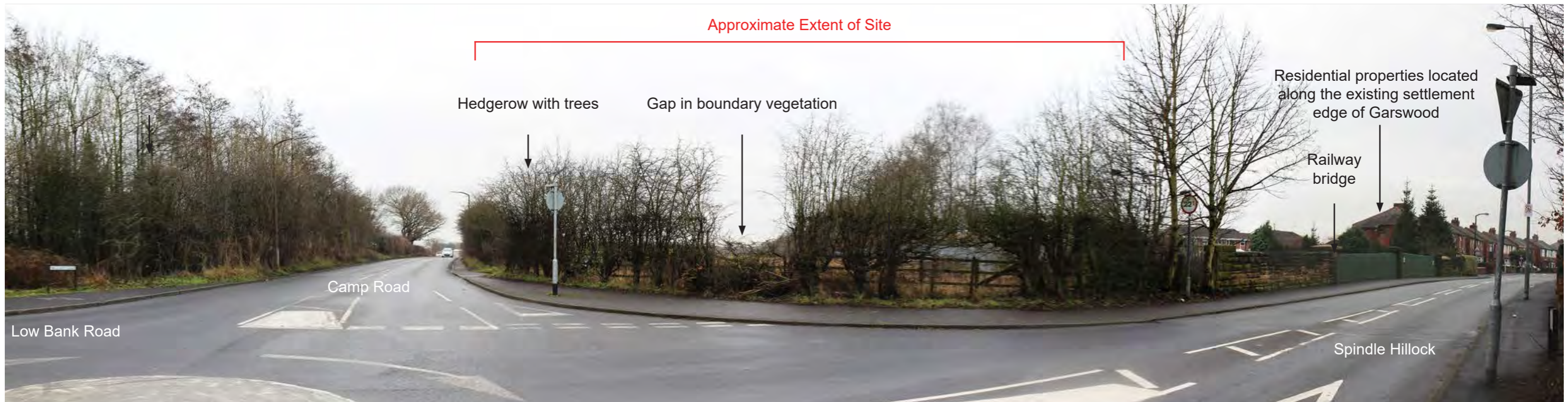
Photoviewpoint 2:	Taken from junction of Strange Road, Camp Road and Gibbon's Road.	Distance from Site:	15m	Orientation	North	Coordinates:	X:356010, Y:399389
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Photoviewpoint 3:	Taken from Public Footpath Ref: SN918.	Distance from Site:	173m	Orientation	North	Coordinates:	X:356102, Y:399258
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Photoviewpoint 4:	Taken from Camp Road.	Distance from Site:	0m	Orientation	North West	Coordinates:	X:356063, Y:399532
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Photoviewpoint 5:	Taken from Spindle Hillock, Camp Road and Low Bank Road.	Distance from Site:	18m	Orientation	South West	Coordinates:	X:356161, Y:399757
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Photoviewpoint 6:	Taken from Spindle Hillock.	Distance from Site:	62m	Orientation	South East	Coordinates:	X:356085, Y:399789
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- Site Boundary
- Building
- Fence
- Hardstanding
- Hedgerow intact
- Hedgerow defunct
- Inundation area
- Scrub and ruderal mosaic
- SI Semi-improved grassland
- TN1
- Tree line



Project Land at Strange Road and Camp Road, Garswood, St Helens
 Drawing Title **Ecology Overview Plan**
 Scale As Shown (Approximate)
 Drawing No. 10786/P07
 Date January 2017
 Checked HC/AL



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Linear rail line embankment tree stock forming good screen. Scattered mature trees interspersed with bushy understorey vegetation with birch, sycamore, hawthorn, oak, and ash. Weaker to north.

Height - 10m / 12m
Root Protection Area - mixed
Recommendation - Development offset to accommodate canopy shading and RPAs of off-site stock. Detailed survey to identify mature tree stock.

Linear hawthorn hedgerow. Gappy, interspersed with occasional sycamore, oak and holly. Deadwood present and minor roadside pruning evident.

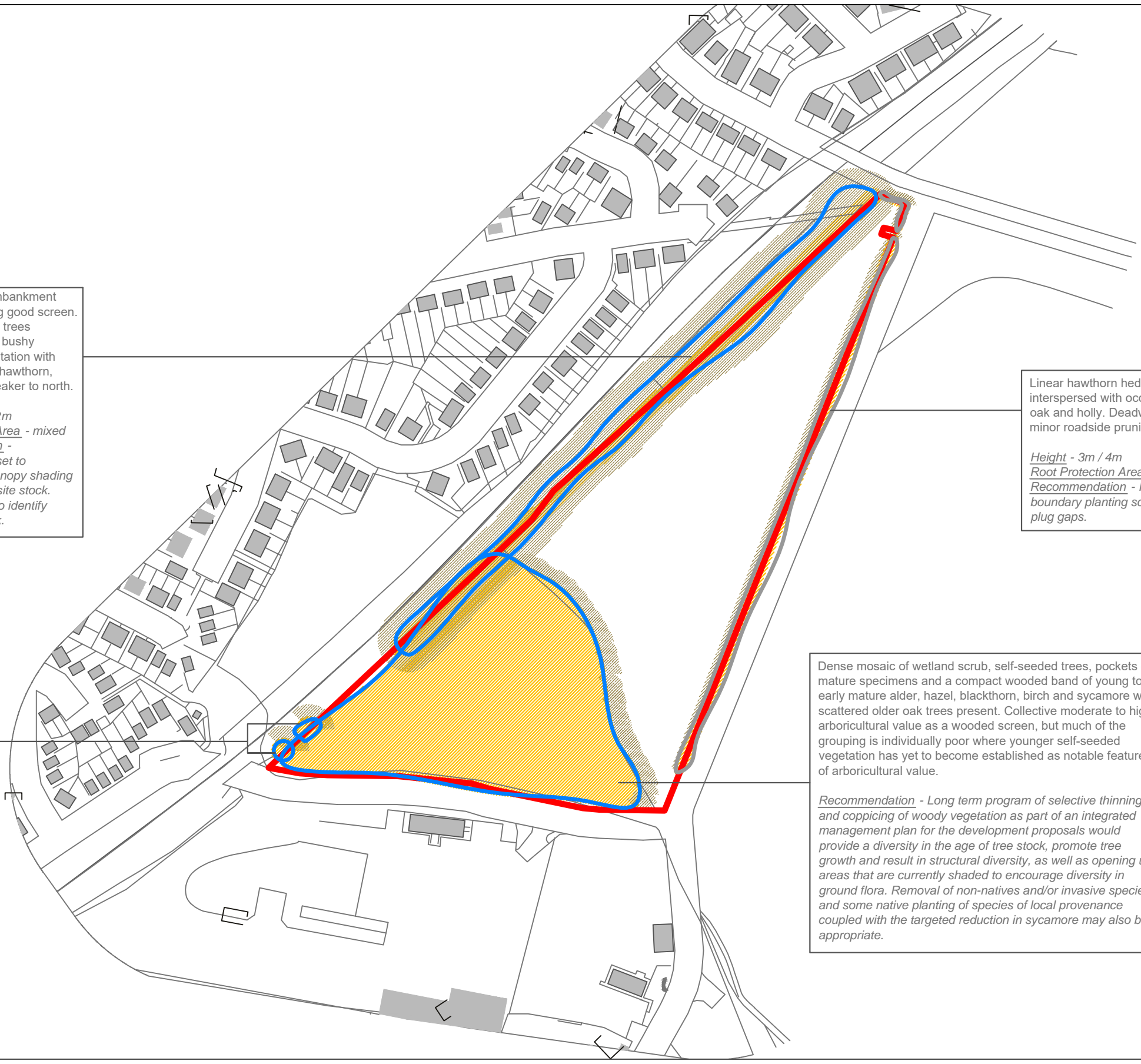
Height - 3m / 4m
Root Protection Area - Up to 2.4m.
Recommendation - Incorporate into new boundary planting scheme, re-stock to plug gaps.







Off-site mature oaks. Broad and naturalised canopies on rail side.

Height - Up to 18m
Root Protection Area - c. 7.2m from stems
Recommendation - Development offset to accommodate canopy shading and RPAs of off-site stock

Dense mosaic of wetland scrub, self-seeded trees, pockets of mature specimens and a compact wooded band of young to early mature alder, hazel, blackthorn, birch and sycamore with scattered older oak trees present. Collective moderate to high arboricultural value as a wooded screen, but much of the grouping is individually poor where younger self-seeded vegetation has yet to become established as notable features of arboricultural value.

Recommendation - Long term program of selective thinning and coppicing of woody vegetation as part of an integrated management plan for the development proposals would provide a diversity in the age of tree stock, promote tree growth and result in structural diversity, as well as opening up areas that are currently shaded to encourage diversity in ground flora. Removal of non-natives and/or invasive species and some native planting of species of local provenance coupled with the targeted reduction in sycamore may also be appropriate.





 Site Boundary	 Tree Shadow Constraints (Indicative)	 Indicative Extent of BS5837 Calculated Root Protection Areas (RPAs)
 Category A - Trees of high quality and value	 Category B - Trees of moderate quality and value	 Category C - Trees of low quality and value

TG Tyler Grange

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This document should not be relied on or used in circumstances other than those for which it was prepared and for which Tyler Grange was appointed. Tyler Grange accepts no responsibility for this document to any other party other than the person by whom it was appointed. All RPA, shading and vegetation locations are approximate in the absence of measured topographic survey data.

Arboriculture Overview Plan

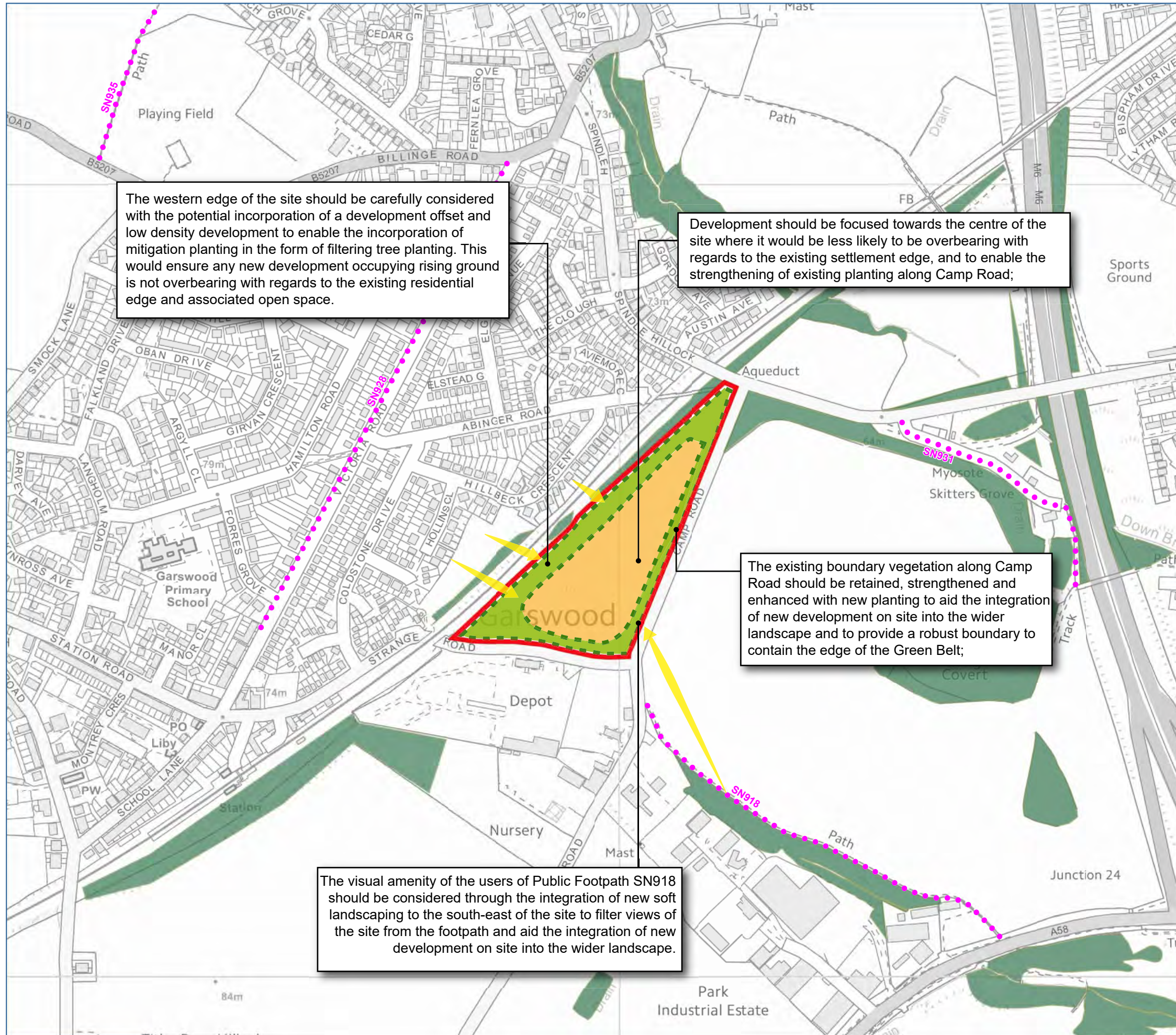
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Project **Land at Strange Road and Camp Road, Garswood**

Drawing No **10786/P08**

Date **January 2017**

Drawn by **JJ** Checked by **AL**









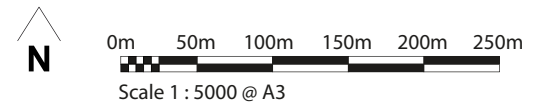
The western edge of the site should be carefully considered with the potential incorporation of a development offset and low density development to enable the incorporation of mitigation planting in the form of filtering tree planting. This would ensure any new development occupying rising ground is not overbearing with regards to the existing residential edge and associated open space.

Development should be focused towards the centre of the site where it would be less likely to be overbearing with regards to the existing settlement edge, and to enable the strengthening of existing planting along Camp Road;

The existing boundary vegetation along Camp Road should be retained, strengthened and enhanced with new planting to aid the integration of new development on site into the wider landscape and to provide a robust boundary to contain the edge of the Green Belt;

The visual amenity of the users of Public Footpath SN918 should be considered through the integration of new soft landscaping to the south-east of the site to filter views of the site from the footpath and aid the integration of new development on site into the wider landscape.

-  Site Boundary
-  Existing Woodland
-  Proposed Landscape Buffer
-  Proposed Development Parcel
-  Public Footpath
-  Views



Project Land at Strange Road and Camp Road, Garswood, St. Helens
 Drawing Title **Landscape Opportunities & Constraints**
 Scale 1 : 5,000 @ A3
 Drawing No. 10786/P10
 Date January 2017
 Checked LHM/AL



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EP3

Proposed Residential Development

Camp Road, Garswood

DR/17022/TN02 - 27 January 2017

1. We are instructed to advise on the transport aspects of the proposal to provide a residential development on the site identified below, at Camp Road, Garswood:



2. The site is roughly triangular in shape and has a frontage to both Camp Road and Strange Road. There are potentially a choice of access locations to the site, with a long straight frontage to Camp Road which offers excellent visibility and the ability to provide a high standard of access.
3. The site is well located in relation to existing residential and employment opportunities. There are local services and facilities within a short walk of the site, including a convenience store, primary school and GP Surgery, all within 800m of the site.

-
4. Bus and rail services are both within 400m of the site. There are two buses per hour provided by the 156 and 157 which provide direct links to St Helens town centre, Rainford, Ashton in Makerfield and Haydock. Garswood rail station is on the Liverpool, Wigan, Preston route and provides 3 service per hour in each direction. Connections to other train services are available on this route.

 5. This is a highly accessible site and there are no obstacles to the successful delivery of this site from a transport point of view.

EL0231



St Helens Local Plan Submission Draft - site specific representations on behalf of Wainhomes NW relating to land off Lords Fold, Rainford

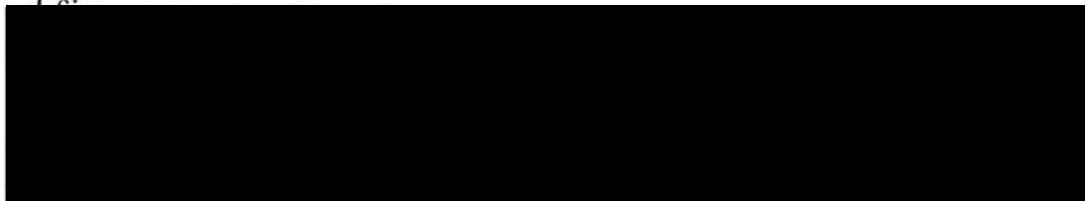
Nick Scott

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:17

Co:



1 Attachment



Land off Lords Fold - 2019 combined.pdf

Dear Sir / Madam,

Please find attached, written site specific representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan. These representations relate to their land south-east of Lords Fold, Rainford.

We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

Nick Scott
Assistant Consultant



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① - LPAOS
② - GBR

Land off Lords Fold, Rainford

Site-specific representations – St Helens Local Submission
Draft

for Wainhomes (North West) Ltd

EP Project Ref: 17-005



Project : 17-005
Site address : St Helens Local Plan
Submission
Client : Wainhomes (North West)
Ltd
Date : March 2019
Author : John Coxon

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1. Introduction

- 1.1 Emery Planning is instructed by our client, Wainhomes (North West) Ltd, to submit site-specific representations to the St Helens Local Plan Submission Draft public consultation exercise. This Statement relates to land off Lords Fold, Rainford and it is supported by a technical assessment undertaken by SCP with regard to highways impact. ✓
- 1.2 We have submitted separate representations on behalf of Wainhomes (NW) Ltd to the St Helens Local Plan Submission Draft with regard to the strategic draft policies. These site-specific representations should be considered in conjunction with our representations to the strategic policies of the St Helens Local Plan Submission Draft. ✓
- 1.3 This Statement supports the re-instatement of our client's site as a housing allocation within the St Helens Local Plan Submission Draft. Further to our previous representations to the Preferred Options consultation in early 2017, we again highlight the suitability of this site for residential development and the 'deliverability' of the site for the purposes of the NPPF, subject to release from the Green Belt. ✓

2. Site location and description

- 2.1 The site is located to the north-western edge of Rainford, which is identified as a principal urban settlement ('Key Settlement') within the draft plan for St Helens. The built-up area settlement boundary encloses the site to three sides. ✓
- 2.2 The site comprises agricultural land that is enclosed by existing built development, trees and Randle Brook. There is a small residential property outside of the site adjacent to the southern side of Lords Fold. The overall site area equates to a site area of approximately 2.45ha. A location plan is provided at **EP1**. ✓
- 2.3 In terms of its relationship to the surrounding area, the site is bounded by: Lords Fold, a part-adopted and part-private highway leading off the B5203 and serving a large industrial estate to the northern and north-western boundaries of our client's site; Pine Dale, which forms part of a wider housing estate, to the south-eastern boundary; and development associated with properties along the B5203 (e.g. Rainford Labour Club) to the northern-eastern boundary. A belt of trees forms the immediate southern and eastern boundaries and Randles Brook extends adjacent to the southern boundary. ✓

2.4 The site is under option to Wainhomes. It is 'deliverable' for the purposes of the NPPF.] (1)

3. Allocation

3.1 These representations support the re-instatement of our client's site as a housing allocation through the emerging local plan. This site was previously identified through the St Helens Local Plan Preferred Options document as a housing allocation for 55 dwellings (Policy HA14).] (1)

3.2 The technical assessment undertaken by SCP at **EP2** demonstrates that access and highways does not represent a constraint to the development of the site. We would suggest that a site-specific allocation of our client's site through the local plan could be worded as follows:] (1)

- The provision of around 60 homes comprising an appropriate mix of sizes and tenures.
- The delivery of an element of affordable housing in accordance with planning policy requirements.
- Appropriate access for vehicular traffic and pedestrians and the submission of a Transport Assessment.
- Provision of a comprehensive landscaping plan for the retention and enhancement of the existing trees and the Randle Brook Local Wildlife Site.
- Contributions to local infrastructure where appropriate and in accordance with planning policy requirements.

4. Green Belt considerations

4.1 Our client's site has been assessed through parcel reference GBP_10_A of the St Helens Local Plan Green Belt Review 2018. It is assessed through the Green Belt Review as having a low contribution in terms of all three of the identified main purposes of including land within the Draft Green Belt for the purposes of paragraph 134 of the NPPF:

- 'Check Urban Sprawl' – Low contribution.
- 'Prevent neighbouring towns merging into one another' – Low contribution.
- 'Assist in safeguarding the countryside from encroachment' – Low contribution.

4.2 The Proforma at Part 1 of the Green Belt Review provides more detailed site-specific commentary on the contribution that our client's site makes to the main purposes of including land within the Green Belt. We copy extracts below: ✓

- *"The sub-parcel is well contained by the physical features of Lords Fold and industrial premises to the north-west and north-east; Randle Brook and residential properties to the south-east; and Rainford Brook to the south-west."*
- *"The sub-parcel does not directly adjoin or lie in close proximity to an identified large built-up area. It is considered insufficient in size to result in substantial sprawl in its own right if released from the Green Belt for development."*
- *"The sub-parcel lies adjacent to the identified settlement of Rainford but does not fall within a strategic gap between other identified settlements."*
- *"The sub-parcel in itself contains little inappropriate development; however it is well enclosed on three sides by development of a more urban nature limiting the sense of openness and affecting any countryside character."*
- *"The sub-parcel does not perform a significant role in preventing sprawl and in maintaining a gap between identified settlements; high levels of enclosure from existing adjacent development limits its openness and countryside character."*

4.3 We agree with the findings of the Green Belt Review. The existing site does not perform a Green Belt function and development of the site would not undermine the integrity of the wider Green Belt. Paragraph 136 of the NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The release of Green Belt land for housing development is necessary in order to meet unmet and future housing needs of the Borough. This comprises exceptional circumstances for the purposes of the NPPF.

2

4.4 With regard to paragraph 139 of the NPPF, the release of our client's site for housing development would help to meet the identified housing requirements for sustainable development. The revised Green Belt boundary would be delineated by defensible, permanent and readily recognisable features to all sides.

4.5 Paragraph 139 of the NPPF states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. We undertake an assessment below of our client's land with regard to the three roles of sustainable development as set out at paragraph 8 of the NPPF:

Economic: New housing development is required across the Borough to include areas of the designated Green Belt in order to ensure that the Borough has a stable workforce in terms of ability and age profile. The construction of new houses would also create construction jobs in the short term, and once occupied, new residents would boost householder spending on goods and services within the surrounding area. New housing development would also generate a New Homes Bonus for the city-region.

Social: Paragraph 8 of the NPPF states that one of the requirements is the supply of housing to meet the needs of present and future generations. The release of our client's site for new housing development would help to ensure that the identified housing needs of the Borough in terms of market and affordable housing are met.

Environmental: The site is highly locationally sustainable with easy and convenient access to a wide range of local services and public transport options. The site is located at the edge of Rainford, which is an identified settlement within St Helens and is suitable for major new housing developments in terms of infrastructure requirements. The development of the site would comprise a logical urban extension with negligible impacts in relation to the main purposes of including land within the Green Belt and limited landscape impact. The release of our client's site for housing would relieve the development pressure on more environmentally sensitive greenfield and Green Belt land across the Borough.

- 4.6 The release of our client's site from the Green Belt for new housing development with immediate effect as part of the emerging local plan is considered to be fully justified with due regard for paragraphs 135 to 139 of the NPPF.

5. Masterplan and technical considerations

- 5.1 Our client's site-specific representations are supported by a Highways Technical Note prepared by SCP (Ref: DR/17022/TN01) (see **EP2**). The main points raised by SCP can be summarised as follows:
- Access to the site could potentially be taken from Pine Dale with the ability to provide a good standard of access.
 - The site is locationally sustainable with shops and local services being located within 800m of the site and buses with links to Rainford Train Station, St Helens, Aston-in-Makerfield and Garswood running every 30 minutes along the B5203.
 - A number of key destinations can be reached from Rainford Train Station, which is within walking distance, with Liverpool being 30 minutes away.
 - Rainford Primary School and Rainford Technology College are within 1km of the site with safe and convenient footway provision between these educational facilities and the site.
 - There are no obstacles to the successful delivery of residential development on this site.
- 5.2 There is no question as to whether a safe and appropriately access can be secured via Pine Dale. In terms of deliverability, our client has full control over one of the residential properties along Pine Dale and there is no uncertainty as to whether this access arrangement can be delivered within the short-term.

5.3 There are very few site-specific constraints to the delivery of housing on this site. This was reflected through the Draft St Helens Green Belt Review 2016, which supported the previous consultation for the emerging local plan i.e. Preferred Options 2016. We would also highlight the following points:

- The development of the site would have low landscape impacts given the urban features that enclose the site and heavily influence its character and appearance.
- The site is suitable for residential development in landscape terms.
- There is a Local Wildlife Site (Randles Brook) adjacent to the site and this can be fully retained through the development of the site with an appropriate buffer provided.
- Any planning application should be accompanied by protected species surveys where appropriate such as water voles and bats.
- The existing trees to the site boundaries can be retained through the development of the site with appropriate mitigation measures implemented such as protected fencing.
- There are no landscape, ecological or arboricultural constraints that would undermine the delivery of housing on this site.

5.4 With regard to deliverability, we again emphasise that the land at **EP1** falls within single ownership with no legal constraints and our client has an option to bring it forward for housing development. Wainhomes (North West) Ltd is a national housebuilder and is very active across the region with a proven track record in the delivery of new homes. Subject to the land being released from the Green Belt, the site could make a significant contribution to the deliverable 5-year supply of housing.

5.5 Our client's site at **EP1** is 'deliverable' within the short-term for new housing development for the purposes of the NPPF.

6. Local Plan evidence base with regard to site constraints

6.1 Our client's site has been subject to the site selection process set out through the St Helens Green Belt Review 2018:

- Step 1: All parcels assessed as having a high or high+ contribution to the Green Belt are excluded.
- Step 2 – All sites with 'prohibitive constraints' are excluded.
- Step 3 - The remaining parcels (69 in total) were then assessed as having 'good', 'medium' or 'limited' development potential based on site constraints and deliverability.

6.2 With regard to Step 1, we agree with the findings of the St Helens Green Belt Review 2018 that the site performs poorly in relation to the main purposes of including land within the Green Belt. We also agree that the site is not subject to prohibitive constraints for the purposes of Step 2.

6.3 In terms of Step 3, our client's site is assessed through the Green Belt Review 2018 as having 'limited' development potential. We do not understand how the Council has come to this conclusion with due regard for the available evidence and it represents a fundamental change in position further to the Preferred Options consultation in 2016.

6.4 Page 70 of the Green Belt Review 2018 sets out the basis for identifying our having a low contribution in this regard, and copy extracts below:

- *"Vehicular access to the sub-parcel can only suitably and readily be provided via Ormskirk Road, the access route from which would require significant improvements to enable the sub-parcel to be developed for housing."*
- *"There are two Local Wildlife Sites (LWS) within the sub-parcel (Randle Brook and Rainford Brook) both of which are prone to flooding and would require a significant buffer from any development."*
- *"In addition, parts of the sub-parcel lie within flood zones 2 and 3, which would further restrict development in these areas."*
- *"Furthermore, there are protected trees within the sub-parcel that would also require appropriate protection from development."*

6.5 In terms of access, as per our previous representations to the Preferred Options 2016 consultation and comments earlier at Section 6 there is no question mark as to whether suitable access can be achieved for the proposed development. SCP have carried out an assessment

on behalf of our client and we are not aware that the local highways authority have queried these findings.

- 6.6 With regard to biodiversity and the Randle Brook Local Wildlife Site, there is no evidence to suggest that the development would undermine the ecological value of the brook which extends around the boundaries of the site. This is a non-statutory ecology designation, and the St Helens Local Plan Consultation Report 2018 notes that Lancashire Wildlife Trust raised no objections to the principle of our client's site being allocated for housing through the Preferred Options consultation exercise in 2016 subject to conditions.
- 6.7 Turning to flood risk, the Randles Brook corridor to the boundary of the site is identified as a Flood Zone 2/3 through the Environment Agency Flood Risk Maps. The site itself is identified as a Flood Zone 1 i.e. at low risk of flooding. There is no evidence to suggest that the development of this site would increase the risk of flooding and the developable platform for the site falls wholly within a Flood Zone 1. Hence, the Draft Sustainability Appraisal 2018 underpinning the emerging local plan does not identify flood risk as a fundamental constraint to development (it is not assessed as 'red' in this regard).
- 6.8 Finally, the site is within influencing distance of trees along the site boundaries. However, there are no trees within the site itself which would require removal or alteration in order to facilitate the development of the site for housing development.
- 6.9 The rationale provided at page 70 of the Green Belt Review 2018 for identifying our client's site as having 'limited' development potential is not justified. The Sustainability Appraisal (SA) 2018 for the Submission Draft Local Plan assesses our client's site as an alternative housing allocation, which is scored as follows:
- 5 green scores relating to access to GP, secondary school, leisure & employment opportunities and reducing the need to travel.
 - 10 neutral scores relating to land quality, air quality, water resources, climate change, distance to a prominent ridgeline, protecting cultural heritage, access to open space, local economy, access to housing and access to services.
 - 2 amber scores relating to flood risk and public rights of way.
 - 2 red scores relating to biodiversity and landscape/visual impact.

6.10 In terms of the 2 red scores, we emphasise the following points that show that our client's site should not be subject to any red scores:

- The point that a site is within influencing distance of a non-statutory ecology designation is not a sound reason for identifying biodiversity as a significant constraint. Lancashire Wildlife Trust have raised no objections to the principle of our client's site as a housing allocation subject to conditions, and there is no evidence to suggest that housing on our client's site could undermine the value of Randles Brook as a Local Wildlife Site (indeed, there may be enhancement as a result of a properly planned residential development). It may be that this is instead assessed as amber i.e. effects that can be mitigated.
- The St Helens Landscape Study 2006 identifies our client's site as falling within Landscape Character Area 'AM3', which is assessed as having 'Medium' landscape and visual sensitivity for new development. There is no evidence to suggest that development of our client's site, which is enclosed on 3 sides by built development and is heavily influenced by urban features, could have significantly adverse landscape and visual impacts. See the following image taken from the St Helens Landscape Study 2006:

Image: St Helens Landscape Study 2006 Landscape Sensitivity Plan (green shows medium sensitivity and yellow shows medium-high sensitivity)



6.11 As shown through the image above, which is the Landscape Sensitivity Map for the Borough, our client's site falls within an area at Medium landscape sensitivity. The area of Rainford itself falls within a 'Medium-High' landscape sensitivity area. Furthermore, a site-specific assessment of our client's site shows that it is heavily influenced by existing urban features, surrounded on 3 sides by built development and there would be negligible landscape impacts as a result of its

release for new housing development subject to detailed design matters and the incorporation of a robust landscaping scheme.

6.12 There is no basis for the application of two red scores for our client's site. We have copied below the relevant table of the SA showing our client's site below and scoring applied (Site: GBP_10A):

Table: SA Scoring for our client's site (Ref: 10A)

Site ID	GB ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridge/line	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
1	GBP_001_a	Land North of Bushey Lane, east of Rainford Road	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
2	GBP_001_b	Land North of Bushey Lane, east of Rainford Road	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
3	GBP_001_c	Land North of Bushey Lane, east of Rainford Road	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
4	GBP_002	Red Delph Farm/Land to the South of Bushey Lane, Rainford	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
5	GBP_005_a	Land east of Rainford By-Pass south of railway line	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
6	GBP_005_b	Land east of Rainford By-Pass south of railway line	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
7	GBP_005_c	Land east of Rainford By-Pass south of railway line	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
8	GBP_006_b	Land east of News Lane west of Junction Road	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
9	GBP_006_c	Land east of News Lane west of Junction Road	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
10	GBP_010_a	Land between Lords Fold and Mossborough Road, east of Rainford By-Pass	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
11	GBP_010_b	Land between Lords Fold and Mossborough Road, east of Rainford By-Pass	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
12	GBP_010_c	Land between Lords Fold and Mossborough Road, east of Rainford By-Pass	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
13	GBP_010_d	Land between Lords Fold and Mossborough Road, east of Rainford By-Pass	Rainford	Discard	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

6.13 Notwithstanding the above, our client's site performs well through the SA even taking into account question marks surrounding the two red scores applied. It performs better than other sites that have been identified through the Submission Draft Local Plan as a housing allocation.

6.14 It is not understood how our client's site has been assessed as having only 'limited' development potential. The evidence base strongly shows that our client's site should instead be assessed as having 'good' development potential. This would lead to our client's site being reinstated as a housing allocation through the emerging local plan.

7. Local infrastructure

- 7.1 The site is located to the edge of the existing built-up area of Rainford with no fundamental constraints in terms of utilities and surface and foul water connections. It is in close proximity to existing key services such as schools and health facilities. Any planning application could secure the provision of developer contributions to local services such as education and health facilities where appropriate and in accordance with planning policy requirements and the tests set out through the Community Infrastructure Levy Regulations 2010.

8. Summary and conclusions

8.1 Our site-specific representations with regard to land off Lords Fold, Rainford can be summarised as follows:

- The site does not perform any Green Belt functions in terms of preventing settlements merging, preventing urban sprawl, or preventing encroachment on the countryside, nor does it have a role in preserving the historic setting of any settlements or landscape features.
- We agree with the findings of the Green Belt Review 2018 that our client's site does not perform a meaningful Green Belt function, although we would place our client's site within a 'new very low/negligible' category given that the site is enclosed on 3 sides by built development.
- The release of the land from the Green Belt for housing is fully justified with regards to paragraphs 135-139 of the NPPF.
- There are no major constraints to development of the site in terms of landscape, ecology and arboriculture.
- There are no obstacles to the delivery of this site for the quantum of residential development identified from a highways and transport perspective.
- The site is highly locationally sustainable in terms of access to key services and public transport.
- Our client's site is within single ownership and Wainhomes (North West) Ltd, a national housebuilder with a proven track record of delivery in the region, has an option on it – the site is 'deliverable' for new housing within the short-term and could make a meaningful contribution to the city-region's 5-year housing land supply position.
- Our client's site has been wrongly assessed through the SA process and it should not be subject to any red scores i.e. likely negative impacts. Notwithstanding this point, the site performs well through the SA process.
- The omission of our client's site as a housing allocation is not justified through the available evidence base for the Submission Draft Plan.

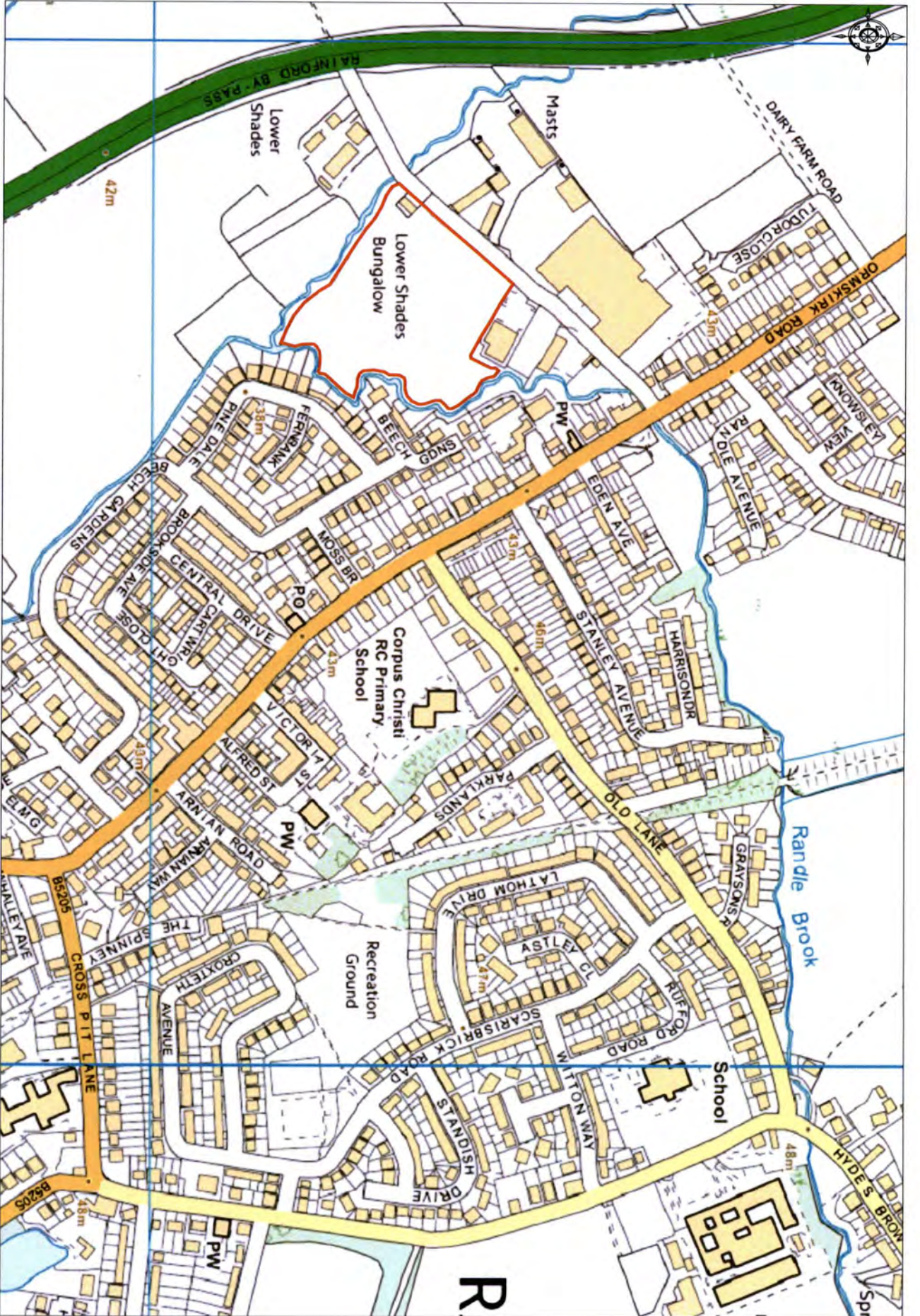
8.2 We fully support the allocation of our client's site for housing development, which would help to meet the identified development requirements across the Borough through increasing and diversifying the supply of new housing and providing an element of flexibility.

9. Appendices

EP1 - Location Plan

EP2 - Highways Technical Note (Ref: DR/17022/TN01) (SCP)

EP1



R

EP2

TECHNICAL NOTE

SCP

Transportation Planning : Infrastructure Design

Proposed Residential Development

Lords Fold, Rainford

DR/17022/TN01 - 27 January 2017

1. We are instructed to advise on the transport aspects of the proposal to provide a residential development on the site identified below, known as Lords Fold in Rainford:



2. Access to the site is proposed from Pinedale and the provision of a traditional residential road with a carriageway measuring 5.5m and 2.0m footways on each side. Visibility splays for speeds of 30mph can be provided from the access and there are no highway capacity or safety issues associated with providing an access to the site.
3. The site is within the built up area of Rainford and is closely related to existing residential development and employment sites, in a sustainable location.
4. There are shops and local services available within 800m of the site, and buses operate along the B5203 providing connections to destinations further afield. Bus services link to Rainford rail station, St Helens, Ashton in Makerfield and Garswood with services running at a frequency of up to every 30 minutes.

Directors: W C P Booker BSc D Roberts IEng FIHE FCIHT J Budd MSc CMILT MCIHT S Carmody BSc CEng MICE MCIHT D Young IEng FIHE PGCert

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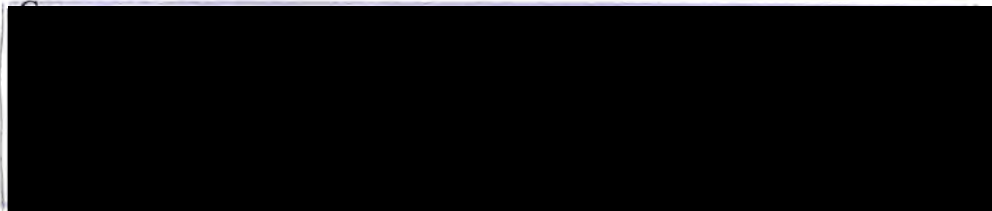
5. From Rainford rail station there are connections to further destinations, with Liverpool, for example, being only 30 minutes away by train.
6. Rainford Primary School and Rainford Technology College are both within 1km of the site and there are footways throughout the area to provide safe routes to these education facilities.
7. This is a highly accessible site and there are no obstacles to the successful delivery of this site from a transport point of view.

ELO232



St Helens Local Plan Submission Draft - site specific representations on behalf of Wainhomes NW relating to land off Winwick Road, Newton-le-Willows
Nick Scott

to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:18



1 Attachment



Land off Winwick Road_ Newton-le-Willows 2019 combined-reduced.pdf

Dear Sir / Madam,

Please find attached, written site specific representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan. These representations relate to their land off Winwick Road, Newton-le-Willows.

We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

Nick Scott
Assistant Consultant



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ELO232



- ① LPA106
- ② LPA105
- ③ GBR

Land off Winwick Road, Newton-le-Willows

Site-specific representations – St Helens Local Plan
Submission Draft

for Wainhomes (North West) Ltd

EP Project Ref: 17-005

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Project : 17-005
Site address : St Helens Local Plan
Preferred Options
Client : Wainhomes (North West)
Ltd

Date : March 2019
Author : John Coxon

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1. Introduction

- 1.1 Emery Planning is instructed by our client, Wainhomes (North West) Ltd, to submit site-specific representations to the St Helens Local Plan Submission Draft public consultation exercise. This Statement relates to land off Winwick Road, Newton-le-Willows and it is supported by technical assessments carried out by Tyler Grange and SCP in terms of landscape, ecology, arboricultural and highways impact. We also submit an indicative masterplan drawing, prepared by Baldwin Design, showing how residential development could be accommodated on the site. ✓
- 1.2 We have submitted separate representations on behalf of Wainhomes (NW) Ltd to this local plan consultation with regard to the strategic policies. These site-specific representations should be considered in conjunction with our representations to the strategic policies of this draft plan. ●
- 1.3 Approximately 50% of our client's site is identified through the Submission Draft as safeguarded land and the residual land within our client's control has been identified as having been removed from the Green Belt and is shown as 'white land'. Although we welcome the identification of our client's site in this way, we also consider that the site in its entirety is capable of making a significant contribution to boosting housing land supply in the plan period via a single housing allocation in order to address the shortfall that we have identified in our strategic representations. ✓

2. Site location and description

- 2.1 The site is located to the edge of Newton-le-Willows, which is the largest settlement within the Borough after St Helens. ●
- 2.2 The site comprises a triangular-shaped field of arable grassland with trees and some planting along the western boundary. The site is relatively flat and equates to an area approximately 12.83ha in size. There are no public rights of way within or adjacent to the site. See the location plan at **EP1**. ✓
- 2.3 In terms of its relationship to the surrounding area, the site is bounded by existing residential development at Wayfarers Drive to the northern boundary, the West Coast Main Line (Coppull to Warrington) railway and Mill Lane (A49) to the eastern boundary and Newton Brook, a wooded area of open space, to the western boundary. ✓

- 2.4 The site falls within single ownership and our client has an option on it, and it is 'deliverable' for the purposes of the NPPF. ✓

3. Proposed allocation

- 3.1 Our client welcomes the identification of approximately 50% of the site as safeguarded land and the removal of the residual land within our client's control from the Green Belt. However, given that the site does not provide a Green Belt function and it is deliverable within the short-term for new housing, we consider that the land in its entirety should be allocated for housing in order to boost significantly the supply of housing land. ①

- 3.2 The site is capable of approximately 255 dwellings with a proportion comprising affordable/starter homes in accordance with planning policy requirements.

- 3.3 The technical assessments undertaken by Tyler Grange and SCP at **EP2** and **EP3** provide a sound basis for securing a masterplan that responds well to the surrounding area and contributes to the sustainable growth of this part of Newton-le-Willows. We have also appended an indicative masterplan drawing, prepared by Baldwin Design, at **EP4** and this shows an option for how residential development could be accommodated on the site with the principal point of access as per the advice received from SCP. ✓

- 3.4 We would suggest that a site-specific allocation of our client's site as a strategic housing allocation through Policy LPA5 could be worded such that it requires the following:

- The provision of around 255 homes comprising an appropriate mix of sizes and tenures.
 - The delivery of an element of affordable housing in accordance with planning policy requirements.
 - Appropriate access for vehicular traffic and pedestrians and the submission of a Transport Assessment.
 - Provision of a comprehensive landscaping plan for the retention and enhancement of landscape features, such as trees, and the provision of soft landscaped buffer areas to the western boundary of the site towards Newton Brook.
 - Contributions to local infrastructure where appropriate and in accordance with planning policy requirements.
- ②

4. Green Belt considerations

St Helens Green Belt Review 2018

4.1 Our client's site has been assessed through parcel reference GBP_45A through the St Helens Local Plan Green Belt Review 2018. It is assessed through the Green Belt Review as performing poorly in terms of all three identified main purposes of including land within the Green Belt for the purposes of paragraph 134 of the NPPF. ✓

4.2 In terms of restricting urban sprawl, the Green Belt Assessment states the following:

"The sub-parcel is bounded to the north by residential development at Wayfarers Drive and Newton Brook Greenway, to the west by Newton Brook Greenway, to the east by the West Coast Mainline railway line, to the south by agricultural land and to the south/west by Newton Brook Greenway leading to Newton-le-Willows Cemetery. The sub-parcel is therefore well contained to the north, east and relatively well contained to the south and west." ●

4.3 In terms of merging of towns, the Green Belt Assessment states the following:

"The sub-parcel does not fall within a strategic gap between two towns. The nearest towns that are not "washed over" by Green Belt are: Newton-le-Willows which adjoins the subparcel and Winwick, Warrington, which lies approximately 1.8km south east of the sub-parcel. A strategic gap could be maintained between Winwick and Newton-le-Willows if this sub-parcel was developed." ✓

4.4 In terms of safeguarding the countryside from encroachment, the Green Belt Assessment states the following:

"The sub-parcel has strong permanent boundaries to the north and east. Given the high level of enclosure, it is considered that the sub-parcel does not have a strong sense of openness or countryside character." ●

4.5 We agree that the site makes a 'low' contribution to the main purposes of including land within the Green Belt as per the St Helens Green Belt Assessment 2018.

Tyler Grange assessment and summary in relation to Green Belt contribution

4.6 A site-specific assessment of the existing site has also been undertaken by Tyler Grange with regard to Green Belt and landscape. Their main points in terms of the landscape credentials of the existing site are as follows: } ③

- the site character is heavily influenced by the surrounding urban context of residential development at Wayfarers Drive to the north and Mill Lane (A49) and the West Coast Main Line railway to the east;
- the site has an urban fringe character due to its edge of settlement location and direct visibility towards the existing settlement edge and houses along Wayfarers Way in particular;
- the site is relatively flat and it is contained by strong boundaries in the form of existing residential development, the West Coast Main Line railway and planting associated with Newton Brook;
- there are two visual receptors to consider through the development of the site with these being footpaths beyond the site and occupiers of nearby residential properties.

4.7 We also provide a summary of the Green Belt assessment undertaken by Tyler Grange with due regard for the main purposes of including land within the Green Belt as set out at paragraph 80 of the NPPF. See the table below:

Main purpose	Summary assessment undertaken by Tyler Grange
To check unrestricted urban sprawl	<p>The triangular-shaped site is bounded by:</p> <ul style="list-style-type: none"> • Residential development at Wayfarers Way to the north; • Mill Lane (A49) and the West Coast Main Line railway to the east; • Newton Brook, a wooded area of open space, to the west. <p>These boundaries provide a robust, permanent and defensible edge such that development would not sprawl further in any direction.</p>
To prevent neighbouring towns merging into one another	<p>Development of this site would not result in the coalescence of Newton-le-Willows and Wargrave due to the physical separation provided by the brook and its associated vegetation, which serves to provide existing separation to the west of the site. Development of the site can ensure the retention of the vegetation to Newton Brook and as such would not reduce the level of separation provided by this existing landscape feature.</p>
Safeguarding the countryside from encroachment	<p>Although the site is open and undeveloped in its existing form, the site is heavily influenced by surrounding urban features that include residential development, the adjacent West Coast Main Line railway and Mill Lane (A49) and the planting associated with Newton Brook.</p> <p>The retention of the strong framework of vegetation to the</p>

	<p>west and south along Newton Brook and the presence of the West Coast Main Line railway line in particular would limit the extent to which any proposed development would be visible from the wider open countryside south of the site.</p> <p>Development of this site would safeguard the countryside from encroachment.</p>
<p>Preserve the setting and special character of historic towns</p>	<p>The site does not play a role in the setting or significance of any historic settlement.</p>

4.8 The site-specific assessment undertaken by Tyler Grange demonstrates that this site is suitable for residential development in Green Belt terms. The analysis undertaken by Tyler Grange is informed by fieldwork, an analysis of desktop data sources and an assessment of the visual receptors to development of the site with reference to photoviewpoints. It concludes that the site is well contained by strong, physical and permanent boundaries, development would not lead to further sprawl and that there would no prospect for the merging of Wargrave and Newton-le-Willows.

4.9 Paragraph 135 of the NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The release of Green Belt land for housing development is necessary in order to meet unmet and future housing needs of the Borough as illustrated through our strategic representations on the overall strategy of the St Helens Local Plan Preferred Options. This comprises exceptional circumstances for the purposes of the NPPF.

4.10 The release of Green Belt land across the Borough should also be seen within the context of the following bullet points of paragraph 139 of the NPPF:

"When defining boundaries, local planning authorities should:

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*

- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."*

4.11 With regard to the bullet points set out above, the release of our client's site for housing development would help to meet the identified housing requirements for sustainable development. As demonstrated through the work undertaken by Tyler Grange, the revised Green Belt boundary would be delineated by defensible, permanent and readily recognisable features to all sides. ✓

4.12 Paragraph 135 of the NPPF states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. We undertake an assessment below of our client's land with regard to the three roles of sustainable development as set out at paragraph 7 of the NPPF: ✓

Economic: New housing development is required across the Borough to include areas of the designated Green Belt in order to ensure that the Borough has a stable workforce in terms of ability and age profile. The construction of new houses would also create construction jobs in the short term, and once occupied, new residents would boost householder spending on goods and services within the surrounding area. New housing development would also generate a New Homes Bonus for the Borough.

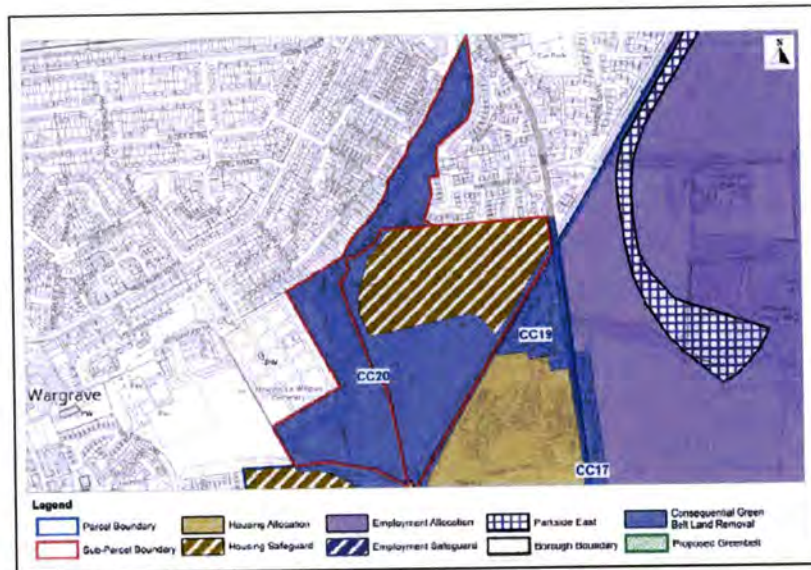
Social: Paragraph 8 of the NPPF states that one of the requirements is the supply of housing to meet the needs of present and future generations. The release of our client's site for new housing development would help to ensure that the identified housing needs of the Borough in terms of market and affordable housing are met.

Environmental: The site is highly locationally sustainable with easy and convenient access to a wide range of local services and public transport options. The site is located at the edge of Newton-le-Willows, which is a principal urban area of St Helens and is suitable for major new housing developments in terms of infrastructure requirements. The work undertaken by Tyler Grange demonstrates that the release of this site for housing development would comprise a logical urban extension with negligible impacts in relation to the main purposes of including land within the Green Belt and limited landscape impact. The release of our client's site for housing would relieve the development pressure on more environmentally sensitive greenfield and Green Belt land across the Borough.

4.13 The release of our client's site from the Green Belt for new housing development with immediate effect as part of the emerging local plan is considered to be fully justified with due regard for paragraphs 134 to 139 of the NPPF.] (2)

Safeguarded land

4.14 The Submission Draft Local Plan 2019 identifies the northern half of our client's site as being safeguarded land and the southern half being 'white land'. This is illustrated through the plan below, which shows the safeguarded land in hatched brown with hatching and the southern half in purple being land consequently removed from the Green Belt:



4.15 In addition to the points already made through Section 4 in terms of the 'low' contribution that our client's site makes to the Green Belt, the Submission Draft Local Plan now proposes the following:

- Housing allocation at 7HA (181 dwellings – Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line).
- Employment allocation at 8EA (Parkside West – 79.57ha of new B2 and B8 development).
- Safeguarded land at 4HS (Land East of Newlands Grange and West of West Coast Mainline).
- Consequential removal of land at Newton-le-Willows Cemetery and Newton Brook.

4.16 This can be seen on the image provided below paragraph 4.14 of this Statement (above). Although our site currently performs poorly in relation to the wider Green Belt, it would have no role to play in the event that the plan is adopted to include these allocations and consequential alterations to the Green Belt boundaries. Notwithstanding housing needs, our

client's site should be removed from the Green Belt given that it would represent an anomaly in the Green Belt boundaries. This only serves the suitability of our client's site for removal from the Green Belt and identification as a housing allocation.

4.17 In case, we have set out through our strategic representations that additional sustainable Green Belt sites need to come forward as new housing allocations in order to meet identified needs. As such, we consider that our client's site is ideally placed to meet this need as a new housing allocation for the reasons discussed with this section of our Statement.

4.18 The northern half of our client's site has been identified as safeguarded land. Although we welcome this recognition of the development potential of the site, it is not clear from the evidence base why our client's site has been split into two separate entities in this way. All of the evidence base documents assess this site as a single parcel of land and it is continuously referred to as parcel '45A' e.g. it is assessed as a single parcel through the Green Belt Review 2018 and the Sustainability Appraisal process. There is no rationale provided that we are aware of for splitting the site into two separate parcels of land. As it stands, we do not consider that the northern half of the site serves a meaningful function as safeguarded land given that it would be surrounded by the urban area on all sides with a generous gap to the Green Belt boundaries. Paragraph 139(c) requires safeguarded land to fall between the urban area and the Green Belt:

"where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period."

4.19 With the above in mind, we consider that the site as a whole should be removed from the Green Belt as part of the 'consequential changes' applied by the Council for similar situations whereby land would no longer serve any Green Belt function as a result of other changes proposed through the emerging local plan. The site should consequently be allocated as a housing allocation as we have set out at Section 3 of this Statement.

5. Masterplan and technical considerations

5.1 Our client's site-specific representations are supported by the following technical assessments, which are summarised in this part of our Statement:

- Landscape, Ecology and Arboricultural Briefing Note (Ref: 10786/R01) (Tyler Grange) – see **EP2**.
- Highways Technical Note (Ref: DR/17022/TN03) (SCP) – see **EP3**.
- Indicative Masterplan drawing (TW/RNW/SL/01) – see **EP4**.

Landscape Impact

5.2 The assessment undertaken by Tyler Grange at **EP2** is informed by fieldwork, desktop data search and an analysis of the visual envelope of the site and photoviewpoints likely to be affected by the development of our client's site. Their points can be summarised as follows:

- the site character is heavily influenced by the surrounding urban context of residential development at Wayfarers Drive to the north and Mill Lane (A49) and the West Coast Main Line railway to the east;
- the site has an urban fringe character due to its edge of settlement location and direct visibility towards the existing settlement edge and houses along Wayfarers Way in particular;
- the site is relatively flat and it is contained by strong boundaries in the form of existing residential development, the West Coast Main Line railway and planting associated with Newton Brook;
- there are two visual receptors to consider through the development of the site with these being footpaths beyond the site and occupiers of nearby residential properties;
- it is recommended that development incorporates a green buffer along Newton Brook and this can be secured through the masterplanning process;
- the site is suitable for residential development in landscape terms.

5.3 The indicative masterplan drawing submitted at **EP4** indicates an option for how housing development could be accommodated on the site. It shows that the site could be developed in such a way that it integrates well with the character and appearance of the surrounding area and responds positively to the site constraints.

Ecology

5.4 The assessment undertaken by Tyler Grange at **EP2** is informed by fieldwork and a desktop data search. Their points can be summarised as follows:

- One nationally designated site and two European designated sites are present within 2km of the site;
- no locally designated statutory sites within 2km of the site, although there a number of non-statutory sites known as Local Wildlife Sites;
- Newton Brook, which adjoins the western boundary and lies partially within the site, is a non-statutory Local Wildlife Sites and an appropriate buffer should be provided between any development and Newton Brook (or otherwise investigation further whether all of Newton Brook qualifies as a Local Wildlife Site in the first instance with the potential for replacement habitat being provided elsewhere or a management plan for the retained area);
- the development of the site would not undermine any protected ecology sites, subject to mitigation measures where appropriate;
- surveys should be carried out in order to inform a planning application to include badgers and birds;
- there are no major ecological constraints to the development of the site.

Arboricultural considerations

5.5 The assessment undertaken by Tyler Grange at **EP2** is informed by fieldwork and their points can be summarised as follows:

- tree coverage to the northern and eastern parts of the site are limited to low quality and self-seeded trees;
- tree coverage within Newton Brook comprises higher quality specimens and these trees can be retained through the residential development of the site and the provision of an appropriate buffer area towards this boundary;
- there are no fundamental arboricultural constraints to the development of the site.

Highways

5.6 The assessment undertaken by SCP at **EP3** can be summarised as follows:

- the site can be served be readily served via access off Mill Lane (A49) with a good width frontage available to create a high standard of access;

- the site is locationally sustainable in terms of access to key services and public transport options with a convenience store, public house and primary school within 1km of the site;
- Newton-le-Willows Train Station is within 400m of the site and provides direct connections to Chester, Liverpool, Manchester Airport, Manchester city centre, St Helens, Warrington and Runcorn;
- bus service no. 22 passes the site and provides hourly connections to Warrington, Newton-le-Willows and Earlestown and bus service no. 360 passes the site and provides 2 buses per hour to Warrington, Newton-le-Willows, Golbourne and Wigan at 30 minute intervals throughout the day;
- there are no obstacles to the delivery of this site from a transport and highways perspective.

Deliverability

- 5.7 The land at **EP1** falls within single ownership with no legal constraints and our client has an option to bring it forward for housing development. Wainhomes (North West) Ltd is a national housebuilder and is very active across the region with a proven track record in the delivery of new homes. Subject to the land being released from the Green Belt, the site could make a significant contribution to the deliverable 5-year supply of housing.
- 5.8 Our client's site at **EP1** is 'deliverable' within the short-term for new housing development for the purposes of the NPPF.

6. Evidence base with regard to site constraints

6.1 Our client's site has been subject to the site selection process set out through the Green Belt Review 2018:

- Step 1: All parcels assessed as having a high or high+ contribution to the Green Belt are excluded.
- Step 2 – All sites with 'prohibitive constraints' are excluded.
- Step 3 - The remaining parcels (69 in total) were then assessed as having 'good', 'medium' or 'limited' development potential based on site constraints and deliverability.

6.2 In terms of the Green Belt contribution of the site:

- The St Helens Green Belt Review concludes that the site performs poorly in relation to the main purposes of including land within the Green Belt. It is assessed as 'low' accordingly in this regard.
- As a result of changes proposed through the emerging local plan, our client's site in its entirety should be consequentially removed from the Green Belt notwithstanding identified housing needs.

6.3 In terms of Step 3 as set out above, our client's site is assessed through the Green Belt Review 2018 as having 'medium' development potential. Pages 93 and 94 of the Green Belt Review sets out the basis for identifying our site in this way, and we copy extracts below:

- *"A suitable access can be obtained off the A49, subject to a 30mph speed limit zone being extended south to achieve the required junction separation distances. However, it is difficult to provide a secondary access into the site."*
- *"The sub-parcel lies adjacent to a LWS (Newton Brook) to the west, alongside which a buffer would be needed to protect it from any potential development. A historic landfill site lies within the southern part of the sub-parcel, which would require further investigation. The NDA has been significantly reduced to remove the need for a secondary access and due to the unknown nature of any contamination within the landfill site. As there is a busy railway line to the east of the subparcel noise attenuation measures would have to be incorporated into any development."*
- *"The sub-parcel is considered suitable for removal from the Green Belt. However, as set out above there are a number of constraints which require further investigation to help achieve a development which can make efficient use of the land within the parcel. "*

6.4 In terms of access, SCP consider that there is no requirement for a secondary access:

- Firstly – There is no essential need for a secondary access. A development of 250 houses can be development. without the need for a secondary access. Former guidance (that has been withdrawn but not directly replaced), stated that up to 300 dwellings could be served by a single point of access.
- Secondly – The internal layout could be designed in a way to provide two routes of access to every dwelling, after an initial short section of road leading to the access; i.e. a short section of road from the access leading to a loop road within the site.
- Thirdly - There are three access roads that almost abut the site to the northern boundary. Any one of these could potentially be negotiated for providing an emergency access. This wouldn't necessarily be open for use by anyone else and could be gated or fenced, and only available for emergency services use.

6.5 Turning to the ecology, Tyler Grange undertook a site-specific assessment in this regard and it is not clear whether it has been taken into account by the Council for the purposes of informing their comments above. Tyler Grange's assessment at **EP2** of this Statement concludes that an appropriate buffer should be provided between any development and Newton Brook (or otherwise investigation further whether all of Newton Brook qualifies as a Local Wildlife Site in the first instance with the potential for replacement habitat being provided elsewhere or a management plan for the retained area). There is no basis for identifying ecology as a significant constraint to development on this site.

6.6 Other issues raised include reference to a historic landfill site and the potential for contamination and the potential for noise from the adjacent railway line. In terms of the former, this would be subject to intrusive site investigations in the usual manner via a planning application and there is no evidence to suggest that it represents a fundamental constraint or that it may reduce the developable area. In any event, we are not aware of what information the Council is reliant upon in terms of concluding that the southern half of the site was formerly a landfill site. Turning to noise, suitable attenuation would be provided at the planning application stage subject to a detailed noise assessment; it may be that no mitigation measures is required or otherwise it may be necessary for measures such as acoustic fencing to be implemented. It is commonplace for residential development to adjoin the railway in this part of the Borough and there is no evidence to suggest that it should be considered to be a major constraint to development.

6.7 We consider therefore that the site should be assessed as having 'good development potential' for the purposes of the site selection process, and this supports the allocation of the site for housing development accordingly.

6.8 Further to the above, the SA scores our client's site as performing well:



Table: SA scoring for our client's site (GBP_45A)

Site ID	GB ref	Site Name	Broad Location	Status	SA1: Protect and enhance biodiversity	SA2: Protect and improve land quality	SA3: Improve air quality	SA4: Sustainably manage water resources	SA5: Mitigate against climate change	SA6: Minimise the risk of flooding	SA7a: Landscape sensitivity	SA7b: Distance to prominent ridge/line	SA8: Protect and enhance cultural heritage	SA9a: Access to open space and green space	SA9b: Public Rights of Way	SA12a: Access to GP	SA12b: Access to Leisure	SA13a: Access to Primary School	SA13b: Access to Secondary School	SA14: Access to employment opportunities	SA15: Support local economy	SA16: Access to housing	SA17: Reduce poverty and social exclusion	SA19: Reduce need to travel	SA20: Access to services
35	GBP_038	Land east of M6 and south of Southworth Road	Haydock	Discard																					
37	GBP_040	Land west of M6 and south of A572 Southworth Road	Haydock	Discard																					
39	GBP_042	Land west of the A49 Mill Lane and to the east of the West Coast Mainline railway line	Newton / Earlstown	Site 7HA																					
40	GBP_043	Land east of the West Coast Mainline railway line and west of Newton Brook	Haydock	Discard																					
41	GBP_044	Land west of the West Coast Mainline and East of Newlands Grange	Newton / Earlstown	Site 4HS																					
42	GBP_045 a	Land west of Winwick Road and south and east of Wayfarers Drive	Newton / Earlstown	Site 5HS																					
43	GBP_046	Land south of Tyer Road and west of the West Coast Mainline railway line	Newton	Discard																					
44	GBP_048	Land at Newton Cottage Hospital, Newton-le-Willows	Newton	Discard																					
45	GBP_049	Land north of Southward Road, Newton-le-Willows	Newton	Discard																					
46	GBP_051 a	Land north-east of Newton-le-Willows, adjacent to M6	Earlstown	Discard																					
47	GBP_051 c	Land north-east of Newton-le-Willows, adjacent to M6	Newton	Discard																					
48	GBP_051 d	Land north-east of Newton-le-Willows, adjacent to M6	Newton	Discard																					
49	GBP_053 a	Land east of Haydock, north of Newton-le-Willows	Newton	Site 2HS																					
50	GBP_053 c	Land east of Haydock, north of Newton-le-Willows	Earlstown	Discard																					
51	GBP_056	Land rear of Tesco Superstore, Haydock. Change	Haydock	Discard																					

6.9 The only red scores applied relate to biodiversity and landscape impact. However, these points have been addressed through the work undertaken by Tyler Grange at **EP2** of this Statement.

6.10 In terms of ecology, it has been demonstrated that this does not represent a significant constraint and there is no reason to allege that there would be harm arising to Newton Brook Wildlife Site; any harm could be mitigated as set out by Tyler Grange. Turning to landscape impact, the red score applied appears to be on the basis that the site falls within a 'medium-high landscape sensitivity area', although this relates to a 2006 Landscape Study that is very high level and takes no account of site-specific issues and the potential for mitigation. In the case of our client's site, Tyler Grange have demonstrated that the site is suitable for residential development in landscape terms given how heavily influenced it is by existing urban features and screened from views.

6.11 Indeed, the Green Belt Review undertaken by the Council in 2016 concluded as follows for our client's site (our client's site was then referenced as 'GBS_141'):

"Very limited public views into the site as it is well screened. Low landscape contribution, except for trees on site edge."

6.12 We do not consider that there is any basis for identifying any negative impacts (red scores) for our client's site through the SA process. This again only serves to emphasise the suitability of our client's site as a new housing allocation.

6.13 With due regard for the above points, our client's site should be assessed as follows and included as a draft housing allocation through the emerging local plan accordingly:

- Green Belt Impact (Stage 1B): Low Impact.
- Development Potential (Stage 2B): Good Development Potential.

7. Local infrastructure

7.1 The site is located to the edge of the existing built-up area of Newton-le-Willows with no fundamental constraints in terms of utilities and surface and foul water connections. It is in close proximity to existing key services such as schools and health facilities. Any planning application could secure the provision of developer contributions to local services such as education and health facilities where appropriate and in accordance with planning policy requirements and the tests set out through the Community Infrastructure Levy Regulations 2010.

8. Summary and conclusions

8.1 Our site-specific representations with regard to land off Winwick Road, Newton-le-Willows can be summarised as follows:

- Tyler Grange have undertaken a site-specific assessment and conclude that development is unlikely to undermine the integrity of the wider Green Belt or landscape.
- The St Helens Green Belt Review concludes that the site performs poorly in relation to the main purposes of including land within the Green Belt. It is assessed as 'low' accordingly in this regard.
- The release of the land from the Green Belt for housing is fully justified with regards to paragraphs 134-139 of the NPPF.
- As a result of changes proposed through the emerging local plan, our client's site in its entirety should be consequentially removed from the Green Belt notwithstanding identified housing needs.
- There are no major constraints to development of the site in terms of ecology and arboriculture.
- There are no obstacles to the delivery of this site for the quantum of residential development identified from a highways and transport perspective.
- A masterplan drawing has been submitted with these representations demonstrating how development of the site could integrate well with the character of the area and responds positively to the site constraints.
- The site is locationally sustainable in terms of access to key services and public transport.
- Our client's site should be assessed as 'good development potential' for the purposes of the local plan site selection process.
- Our client's site is within single ownership and Wainhomes (North West) Ltd, a national housebuilder with a proven track record of delivery in the region, has an option on it – the site is 'deliverable' for new housing within the short-term and could make a meaningful contribution to the Borough's 5-year housing land supply position.

8.2 The allocation of our client's site for housing development would represent sustainable development, and would assist in meeting shortfall in housing land supply that we have identified in our strategic representations.

9. Appendices

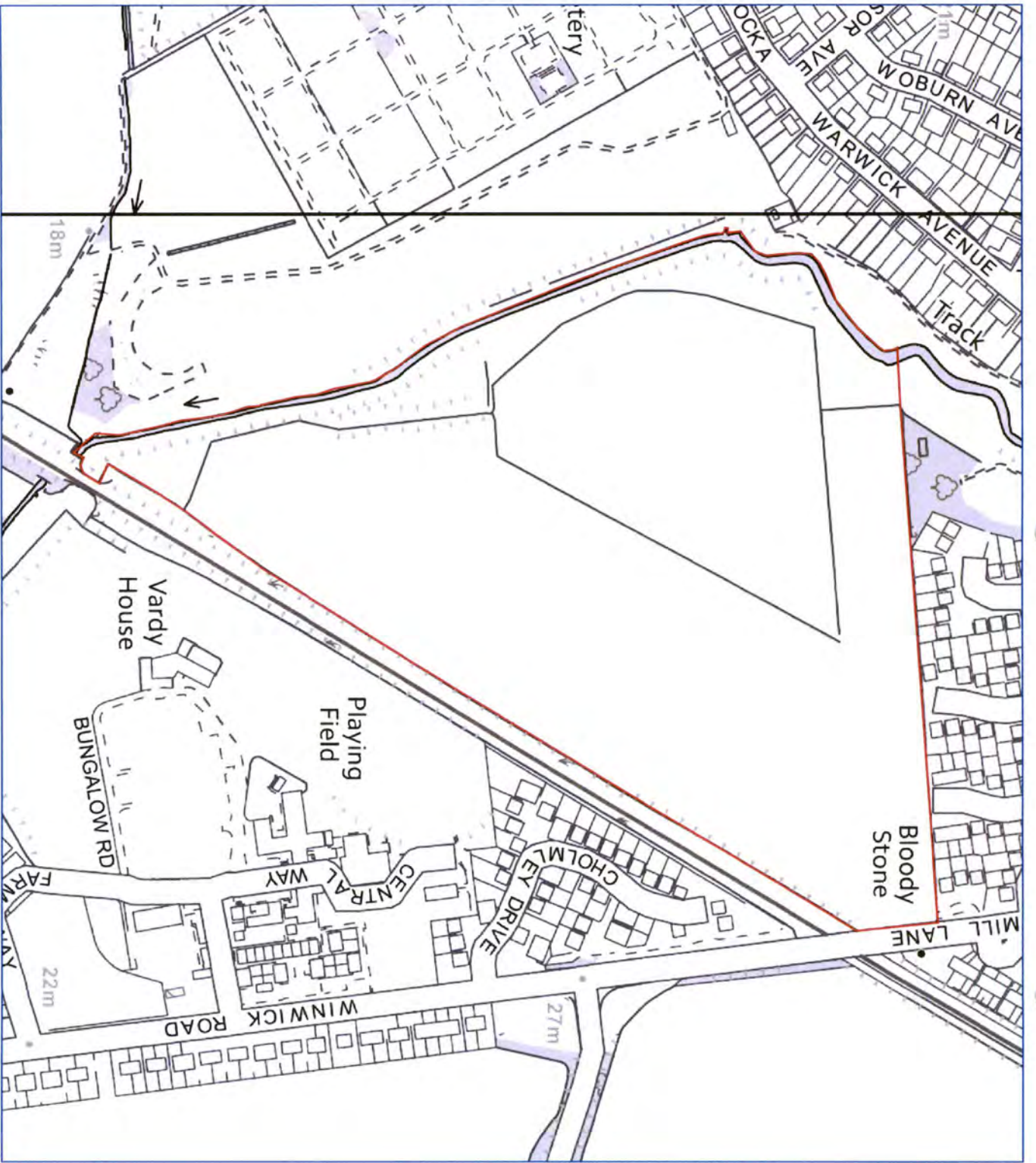
EP1 - Location Plan.

EP2 - Landscape, Ecology and Arboricultural Briefing Note (Ref: 10786/R01) (Tyler Grange).

EP3 - Highways Technical Note (Ref: DR/17022/TN03) (SCP).

EP4 – Indicative Masterplan drawing (TW/RNW/SL/01).

EP1



□ Site Boundary



Project
 Land at Red Bank, Newton-le-Willows,
 St Helens

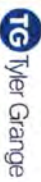
Drawing Title
Site Location Plan

Scale
 As Shown (Approximate)

Drawing No.
 10786/P11

Date
 January 2017

Checked
 HCVL



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EP2

Land at Red Bank, Newton-le-Willows, St Helens

10786_R01_Landscape, Ecology and Arboriculture Briefing Note

1.0 Introduction

- 1.1. This report has been prepared by Tyler Grange LLP on behalf of Wainhomes (NW) following desktop analysis and preliminary fieldwork undertaken in January 2017.
- 1.2. The overview provides advice relating to landscape character and visual amenity, ecology and arboriculture matters at a high level to appraise the feasibility of the future residential development at Newton le Willows, St Helens (hereafter referred to as 'the site').
- 1.3. The overview report does not constitute a full Landscape and Visual Appraisal (LVA) / Landscape and Visual Impact Assessment (LVIA) or BS5837:2012 Tree Quality Survey, nor is it a comprehensive assessment of ecology issues. It is intended that this work will inform potential development going forward and provide a review of the suitability of the land for release from the Green Belt.
- 1.4. The report should be read alongside the **Landscape Context Plan (10786/P01)**, **Landscape Photoviewpoints (10786/P02)**, **Ecology Overview Plan (10786/P03)** and **Arboriculture Overview Plan (10786/P04)** and **Landscape Opportunities and Constraints (10786/P09)** that are included at the rear of this report.

2.0 Site Context

(See **Landscape Context Plan 10786/P01**)

- 2.1. The site is located at the south-eastern periphery of Newton-le-Willows, a town in St. Helens, England. Newton-le-Willows is located 8km to the east of St. Helens on the edge of the borough.
- 2.2. The site is centred on OS grid reference SJ592947 and extends to approximately 12.83 hectares (31.7 acres). The site comprises a field of arable grassland with trees and riparian vegetation along the western boundary formed by Newton Brook. The site is currently accessed by a residential drive off Mill Lane which leads down to a field gate in the northern corner of the site.
- 2.3. The site is bound to the north by the residential development at Wayfarers Drive. To the east, the site is bound by Mill Lane (A49) and the West Coast Main Line (Coppull to Warrington). To the south-west, the site is bound by areas of open space to the south of Newton-le-Willows Cemetery. To the west, the site is bound by Newton Brook and associated vegetation.

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- 2.4. There are no Public Rights of Way within the site or with immediate connections to the site. The closest public footpath (Ref SN/658) is to the west of the site on the western side of Newton Brook (approximately 26m away). This route runs north-south alongside the brook and connects with a further public footpath (Ref. SN/606) which runs east-west between Winwick Road (A49) and Park Road South.
- 2.5. Topographically, the site is located on relatively flat landform at approximately 25m AOD (Above Ordnance Datum) with the site levels falling locally to the west towards Newton Brook to approximately 20m AOD.

3.0 Landscape Context

(See **Landscape Context Plan 10786/P01**)

- 3.1. A site walkover survey was conducted on the 11th of January to assess the landscape character and visual amenity of the site. The weather was clear and suitable for the level of study undertaken for this report. A desktop study of available data sources was also undertaken of national and local landscape designations and policies. As stated above, this work does not constitute a full Landscape and Visual Appraisal (LVA) / full Landscape and Visual Impact Assessment (LVIA), but it does establish initial recommendations and conclusions associated with landscape matters.
- 3.2. The site has an urban fringe character due to its edge of settlement location, with direct visibility towards the current settlement edge, in particular towards the houses along Wayfarers Drive. Although the current agricultural use of the land gives it a somewhat open character, the site is contained by the trees and riparian vegetation to Newton Brook to the west and by Mill Lane (A49) and the West Coast Main Line to the east.

Planning Policy

- 3.3. The site falls within the administrative borough of St. Helens and is subject to a Green Belt designation (Overall Spatial Strategy Policy S1 Green Belt and Rural St. Helens Policy CAS 5) within the St. Helens Council Local Plan Core Strategy (Adopted October 2012).
- 3.4. Local Policies relating to landscape character and visual amenity that will need to be considered as part of any site promotion / emerging development proposals include:

St. Helens Council Local Plan Core Strategy (Adopted October 2012)

- Policy CAS 3.1 Newton-le-Willows and Earlstown Strategy
 - Policy CAS 5 Rural St. Helens;
 - Policy CP 1 Ensuring Quality Development in St. Helens;
 - Policy CQL 1 Green Infrastructure;
 - Policy CQL 2 Trees and Woodlands; and
 - Policy CQL 4 Heritage and Landscape.
- 3.5. CAS 5 policy coverage generally corresponds to the designated Green Belt and is restrictive with regards to development within the area it covers. In terms of landscape, part of this policy is to encourage the protection and enhancement of landscape character. Rural St. Helens coincides with the Green Belt, where Green Belt policy will apply, and any development will need to be informed by the Landscape Character Assessment.
 - 3.6. The remaining applicable landscape and visual related policies seek to ensure high quality development, the protection and enhancement of Green Infrastructure, trees and hedgerows, and the protection, conservation and preservation of St. Helens' landscape and historic character.



- 3.7. The relevant saved policies of the St. Helens Unitary Development Plan (1998) are listed below. These Saved Policies together with the Core Strategy Local Plan form the Development Plan for the Borough.

St. Helens Unitary Development Plan (1998) Saved Policies

- Policy: S1 Green Belt;
 - Policy: GEN6 Incidental Open Space Provision;
 - Policy: GB1 & GB2 General Criteria for Development Control Policy retained in the Green Belt;
 - Policy: ENV1 Protection of Open Space; and
 - Policy: ENV13 New Tree Planting on Development Sites.
- 3.8. Saved Policies S1, GB1 and GB2 provide Green Belt policy for St. Helens and set out the general criteria for development control and the judgement of new development in the Green Belt. The remaining applicable landscape and visual related policies seek to provide and protect open spaces and ensure tree planting is incorporated within new developments.
- 3.9. In addition to the above policies, the following Supplementary Planning Documents (SPD), Supplementary Planning Guidance (SPG) and Evidence Base Documents also need to be taken into consideration:

Supplementary Planning Documents

- Trees and Development (June 2008)
- New Residential Development

Evidence Base Documents

- St. Helens Local Plan Draft Green Belt Review (2016)
- Strategic Housing Land Availability Assessment (SHLAA 2012 & 2016)
- St. Helens Council Open Space Assessment

Green Belt Context

- 3.10. A review of the site's performance and suitability for release from the Green Belt is summarised below in relation to the applicable principal Green Belt objectives as set out within the NPPF (the Framework) from a landscape perspective and in relation to the findings of the St. Helens Local Plan Draft Green Belt Review 2016. Within the St. Helens Local Plan Draft Green Belt Review, the site is located within Green Belt Parcel GBP_045 and within this parcel, the site is identified as Green Belt Site GBS_141.

To check unrestricted sprawl

- 3.11. The principal consideration here is the sprawl of the urban edge of Newton-le-Willows southwards. The site is bounded by the existing settlement edge of Newton-le-Willows to the north, Mill Lane (A49) and the West Coast Main Line to the east and to the west Newton Brook and its associated trees and riparian woodland.
- 3.12. The St. Helens Local Plan Draft Green Belt Review assesses the wider parcel (GBP_45) the site sits within as "low" in terms of overall significance and describes the parcel as: "*Well contained by railway to east and housing to north and west.*"
- 3.12. The strong, permanent boundaries of the site formed by the existing settlement edge, the railway line and the brook with its associated vegetation would prevent the sprawl of Newton-le-Willows southwards.

To prevent neighbouring towns merging into one another

- 3.13. The principal consideration here is the perceptual or physical coalescence of the settlements of Newton-le-Willows and Wargrave to the west.
- 3.14. The St. Helens Local Plan Draft Green Belt Review assesses the wider parcel (GBP_45) the site sits within as "low" in terms of overall significance and describes the parcel as a: "*Strategic gap - settlement centred on Mill Lane and Winwick Road separated from larger settlement of Wargrave.*"
- 3.15. In terms of the site, this is not a concern; development of the site would not result in the coalescence of these two urban areas due to the physical separation provided by the brook and its associated vegetation which serves to provide existing separation to the north of the site. Development of the site can ensure the retention of the vegetation to Newton Brook and as such would not reduce the level of separation provided by this existing landscape feature.

Safeguarding the countryside from encroachment

- 3.16. The principal consideration here is to prevent development encroaching upon the area of countryside around Newton-le-Willows and impacting upon its character and or reducing its visual amenity. Whilst the open and currently undeveloped nature of the site gives it a somewhat open character, the enclosure provided by the surrounding built form alongside the vegetation associated with Newton Brook, as well as the direct inter-visibility with the residential edge and the influence of the adjacent railway line and Mill Lane (A49), all limits the extent to which it can be considered rural or of a countryside character.
- 3.17. The St. Helens Local Plan Draft Green Belt Review assesses the wider parcel (GBP_45) the site is identified within as "low" in terms of overall significance and describes the parcel as: "*Woodland, farmland and brook make up the parcel, however, it is enclosed to north and part of west by housing and by railway line to east.*"
- 3.18. The retention of the strong framework of vegetation to the west and south along Newton Brook and the presence of the West Coast Main Line railway line would limit the extent to which any proposed development would encroach further into or be visible from the wider open countryside south of the site.

Preserve the setting and special character of historic towns

- 3.19. Available information does not determine any specific role that the site plays in providing an important setting to Newton-le-Willows. As always, aspects of this landscape are expected to be historic in origin, but no particularly rare or unique historic landscape features have been identified at this stage.
- 3.20. The St. Helens Local Plan Draft Green Belt Review does not assess the parcel against the special character of historic towns.

Landscape Character Context

- 3.21. At a national level the site lies within the 'Lancashire Coal Measures' Character Area (National Character Area 56) however, at a district level, and of greater relevance, the site and study area is described in the Landscape Character Assessment for St. Helens (2006).
- 3.22. Within this district level Landscape Character Assessment, the site is identified within the 'Separate Settlement' (Type 12 as set out within the Landscape Character Assessment for St.



Helens (2006)) and is more specifically identified within the 'Newton-le-Willows' Character Area (12 SS 1).

- 3.23. The Newton-le-Willows landscape character area is described as a settlement located on a raised area in the fork of two valleys – Sankey Brook and the Sankey Canal and Newton Brook. The settlement is divided into two broad areas. Newton contains a medieval centre and a strong historic street pattern with more contemporary housing development on the edge. The historic industrial Vulcan works and associated village are found to the south of the settlement.
- 3.24. The key characteristics are:
- *“Settled areas of landscape which have developed outside the main urban landscape of St Helens, and have a distinct settlement character and defined edges to create a separate settlement;*
 - *distinctive separate character of the settlement is reinforced by the historic development on elevated landscapes on gentle slopes and broad ridgelines above, or on the edge of a broad valley;*
 - *landuse primarily defined by developed settled land use, characterised by a variety of development forms, primarily residential;*
 - *prominent church building with vertical spire often denotes historic core with associated old market street or main street lined by a number of individual sandstone stone houses. The prominence of the church in the wider landscape and as an orientation feature is emphasised by the elevated location developed as the modern core of the settlement;*
 - *defined historic centre and street structure with varying degrees intactness and some original historic architecture;*
 - *physically separated from St Helens and other settlements by rural or urban fringe landscape, but with settlement edge defined to a lesser or greater clarity to give a sense”.*
- 3.25. The key characteristic found on site is the rural or urban fringe landscape. The other characteristics found adjacent to the site are the defined edges to create a separate settlement and the primarily residential land use.
- 3.26. It is evident from fieldwork, that although the site is agricultural in nature it has a strong visual relationship with the residential edge of Newton-le-Willows to the north and the West Coast Main Line to the east and south. The western boundary is formed by Newton Brook and associated vegetation through which glimpsed views of the site are possible from the settlement edge of Wargrave and Newton-le-Willows Cemetery.

Visual Context

(See Landscape Context Plan 10786/P01 and Photoviewpoints 1-7 10786/P02)

- 3.27. The site varies in terms of visual enclosure. The greatest level of enclosure is achieved where the topography of the site is lowest to the west adjacent to Newton Brook and where the vegetation associated with the brook filters views of the site. The site topography rises towards the east and here glimpsed views are possible from the south and from residential development to the immediate north and to the east of the railway line.
- 3.28. The approximate extent of the visual envelope (VE) is set out below:
- To the north – visibility towards the site is restricted by the vegetation associated with Newton Brook and the residential development associated with Wayfarers Drive (see **Photoviewpoint 6**). Glimpsed views are possible from the ends of the cul-de-sacs which form Wayfarers Drive (see **Photoviewpoint 7**);
 - To the east – limited views towards the site are possible from Mill Lane (A49) close to the railway bridge with the rooflines within Wargrave visible above the vegetation associated with Newton Brook (see **Photoviewpoint 1**).

- To the south – the visual envelope extends towards the public footpath (Ref. SN/606) (see **Photoviewpoint 2**). However, the rising topography restricts views from further afield; and
 - To the west – views from public footpath (Ref. SN/658) towards the site are filtered by the trees and riparian vegetation alongside Newton Brook (see **Photoviewpoints 3, 4 & 5**).
- 3.29. Overall, the existing framework of site boundary vegetation, rising topography, adjacent built up edge and the railway line embankment results in the visual envelope being limited to the immediate surroundings.
- 3.30. Potential visual receptors to development of the site include:
- Users of the Public Right of Way network, including footpaths SN/658 and SN/606 which run along the western and southern boundaries respectively;
 - Private residents associated with the adjacent residential edge to the north (Wayfarers Drive and Mill Lane (A49));
 - Private residents associated with the adjacent residential edge to the east (Cholmley Drive);
 - Users and employees associated with the West Coast Main Line to the east of the site; and
 - Fleeting highway views from vehicular users of Mill Lane (A49) to the north-east.
- 3.31. It is evident that due to the visual context of the site and surrounding landscape, there are relatively few receptors that are likely to be impacted on and there is a limited visual relationship between the site and the wider Green Belt landscape, despite the site's location on the settlement edge. There are opportunities to utilise the screening provided by the framework of green infrastructure already present within and adjacent to the site to develop the site sensitively in a way which does not impact upon the perceived openness of the wider Green Belt landscape.
- 3.32. A key consideration in terms of visual impact will be the visual amenity of the users of Footpath SN/658 and SN/606 which run close to the western site boundary. This may take the form of a development offset to the western and southern boundary which could incorporate new soft landscaping at the development edge. This ties in with the need for a development offset to Newton Brook to ensure retention and protection of the existing vegetation. Another key consideration is the residential amenity of properties located along the existing settlement edge adjacent to the northern boundary. Their amenity will need to be respected through appropriate development offsets and the use of soft landscaping and screening where appropriate.

Landscape Conclusions and Recommendations

*(See **Landscape Opportunities and Constraints Plan 10786/P09**)*

- 3.33. In response to the desktop and fieldwork undertaken, the following conclusions are presented:
- The existing character of the site is agricultural however, the site character is also heavily influenced by the surrounding urban context of residential development at Wayfarers Drive to the north, and by Mill Lane (A49) and the West Coast Main Line to the east;
 - Topographically, the site is located on relatively flat landform with ground levels within the site falling locally towards Newton Brook to the west;
 - The site is contained by the strong boundaries formed by the existing residential development to the north and north-east, Newton Brook and associated vegetation to the west and the West Coast Main Line to the east; and
 - in terms of visual receptors, there are two main receptors, namely users of footpaths SN/658 and SN/606 which run along the western and southern boundaries respectively and the residents of development adjacent to the north boundary (Wayfarers Drive and



Mill Lane). The visual amenity of these receptors should be carefully considered in the development of the site.

- 3.34. In order to inform the quantum of the development the following recommendations are presented:
- Development should be focused towards the east adjacent to the existing settlement edges; and
 - The incorporation of a green buffer along Newton Brook would satisfy ecology requirements and would provide opportunities to create an area of public open space with groups of tree and shrub planting to filter views from Public Footpath SN/658 to the west of the site and SN/606, and the wider Green Belt landscape to the south.
- 3.35. Whilst it is appreciated that only a broad level assessment has been undertaken, this technical note has demonstrated that residential development within the site could be accommodated with reference to the site-specific conditions.
- 3.36. In terms of the Green Belt, when assessed from a landscape perspective the development of the site is well contained by its boundaries and development would not lead to further sprawl. The development would reduce the distance of the strategic gap between residential development at Mill Lane and Winwick Road and Wargrave but the development offset to Newton Brook will push the development towards the centre and east of the site and this gap distance is consistent with the existing gap to the immediate north of the site. The south-western boundary of the site is formed by Newton Brook and associated vegetation which filters views to the immediate south-west and footpath SN/606 runs alongside the western side of the brook. These existing permanent landscape features would also contribute to the prevention of further encroachment in to the wider Green Belt countryside.
- 3.37. Although the receptors immediately adjacent to the site (users of footpaths SN/658 and SN/606 and residents of Wayfarers Drive and Mill Lane) will experience a change in visual circumstances, receptors within the wider context of the site will only notice a minor change to the settlement and the effects on landscape character will be localised geographically.
- 3.38. These receptors alongside the existing onsite landscape features will need to be sensitively considered as part of future design proposals for the site. This can be carried out through the incorporations of the recommendations listed above as well as new soft landscaping internally to proposed residential layouts.
- 3.39. With the above conclusions taken into account and with respect to landscape and visual matters, this site should therefore be considered suitable for residential development and release from the Green Belt.

4.0 Ecology Context

- 4.1. A site walkover survey was conducted on the 18th January 2017 by Hayley Care, an experienced field ecologist and Associate member of Chartered Institute of Ecology and Environmental Management (CIEEM).
- 4.2. The methods used during the walkover survey broadly followed methods used in an 'extended' Phase I habitat survey. The technique is based upon Phase I survey methodology (JNCC, 2010). This 'extended' Phase I technique provides an inventory of the habitat types present and dominant species.
- 4.3. The weather was dry and overcast (100% cloud cover), relatively mild (10°C) and calm (Beaufort scale 0).
- 4.4. It is important to note that the walkover was undertaken in a sub-optimal time of year for the assessment of vegetative composition, and some plants may be missed due to seasonal

dieback. However, for the purposes of this report it is considered that the survey effort would flag up any potential ecological matters that would require further investigation if the site is taken forward for planning.

- 4.5. A desk based data search was also conducted. The aim of the data search is to collate existing information about statutory and non-statutory sites which are present close to the site.
- 4.6. The data search has been undertaken for a 10km radius around the site for European statutory sites, a 2km radius for national statutory sites and non-statutory sites.
- 4.7. No protected or priority species records have been collated at this point.

Planning Policy & Legislation

- 4.8. This section briefly summarises the legislation and local planning policies, relevant to the baseline ecology results.

Legislation

- 4.9. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:
 - The Conservation of Habitats and Species Regulations 2010
 - The Wildlife and Countryside Act 1981 (as amended)
 - The Countryside and Rights of Way Act 2000
 - The Natural Environment and Rural Communities Act 2006
 - The Hedgerows Regulations 1997
 - The Protection of Badgers Act 1992
- 4.10. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2010 (as amended).
- 4.11. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.
- 4.12. The Countryside and Rights of Way Act 2000 (CROW) strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.
- 4.13. Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 lists UK priority species and habitats subject to conservation action and are referred to as Species of Principal Importance (SoPIs) or Habitats of Principal Importance (HoPIs). Section 41 of the NERC Act states that local planning authorities must have regard for the conservation of both SoPIs and HoPIs.
- 4.14. The Protection of Badgers Act 1992 consolidates the previous Badger Acts of 1973 and 1991. The legislation aims to protect the species from persecution, rather than being a response to

an unfavourable conservation status. As well as protecting the animal itself, the 1992 Act also makes the intentional or reckless destruction, damage or obstruction of a badger sett an offence. A sett is defined as 'any structure or place which displays signs indicating current use by a badger'. In addition, the intentional elimination of sufficient foraging area to support a known social group of badgers may, in certain circumstances, be construed as an offence by constituting 'cruel ill treatment' of a badger. Badgers are not the subject of conservation action.

Planning Policy

- 4.15. Local Policies relating to ecology that will need to be considered as part of any site promotion/emerging development proposals include:

St. Helens Core Strategy (adopted October 2012)

- CP1 'Ensuring Quality Development in St Helens' - safeguards and enhancement of GI and biodiversity;
- CQL 1 'Green Infrastructure';
- CQL 2 'Trees and Woodland' - protecting and safeguarding trees, woodland and hedgerows;
- CQL 3 'Biodiversity and Geological Conservation' - protecting and managing species and habitats and creation of habitat and linkages; an
- CAS 5 'Rural St. Helens' - Protect, manage and enhance biodiversity and create opportunities for biodiversity.

Saved Policies of 1998 Unitary Development Plan (UDP) (saved September 2007)

- ENV 3 Greenways
- ENV 4 'Statutory Site Protection'
- ENV 5 'Sites of Community Wildlife Interest & Local Nature Reserves'
- ENV 12a and 12b 'Development Affecting Existing Trees'
- ENV 13 'New Tree Planting on Development Sites'

St. Helens Council LDF Supplementary Planning Documents

- Biodiversity (adopted June 2011)

- 4.16. The SPD promotes the protection, retention and conservation of habitats and species to address biodiversity and green infrastructure enhancements.

Statutory Protected Sites

- 4.17. Two European designated sites are present within 10km of the site and one nationally designated site within 2km of the site. Details of these sites is given in **Table 4.1** below.

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Summary of Reason for Designation
Manchester Mosses (Risley Moss SSSI)	SAC / SSSI	7.8km SE	Degraded raised bogs still capable of natural regeneration.
Rixton Clay Pits	SAC / SSSI	10km SE	Exceptional Great crested newt <i>Triturus cristatus</i> population present.

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Summary of Reason for Designation
Highfield Moss	SSSI	1.7km NE	Mixed valley mire communities and acidic grassland habitats.
Abbreviations: SAC - Special Area of Conservation SSSI - Site of Special Scientific Importance.			

Table 4.1: European, national and local statutory designated sites within the search radius.

Non-Statutory Protected Sites

- 4.18. 16 non-statutory sites, known as Local Wildlife Sites (LWSs) in St Helens, are present within the search area. Details of these sites are given in **Table 4.2** below:

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Summary of Reason for Designation
Newton Brook 05	LWS	On site	Section of Newton Brook with adjacent flood plain habitat. Supports a number of nationally, regionally and locally important species and habitats including: unimproved grassland, nationally rare marsh yellow-cress <i>Rorippa islandica</i> , regionally important small-flowered Crane's-bill <i>Geranium pusillum</i> and water vole <i>Arvicola terrestris</i> .
Newton Brook 03	LWS	400m SE	Section of Newton Brook further downstream of 05 above. Lined by mature trees and grassland.
Gallows Croft	LWS	445m SE	A stretch of broadleaved woodland with a small area of grassland to the NW.



Site Name	Designation	Distance and Direction from Site (km N/S/W/E)	Summary of Reason for Designation
Willow Park	LWS	615m N	Woodland and grassland with Newton Brook running north to south from Newton Lake (the adjacent LWS to the north).
Mesnes Park and Stream	LWS	660m NW	Parkland with mature trees and a stream.
Woodland East of Wargrave Road	LWS	665m W	Broadleaved woodland containing a waterbody and wet ditch.
Newton Lake and Southern Woodland	LWS	775m N	Newton lake surrounded by woodland and areas of grassland. Connected to Willow Park LWS to the south.
Old Hey Wood	LWS	945m SW	Broadleaved woodland lining the north bank of the disused Sankey canal.
Sankey Brook, Sankey Valley	LWS	1km SW	Sankey brook and associated bankside habitats.
Red Brow Wood	LWS	1.2km W	Broadleaf woodland.
Collingwood Road, Openspace	LWS	1.3km NW	Area of grassland with scattered mature trees and shrubs.
Castle Hill	LWS	1.3km N	Grassland and woodland with several waterbodies and Millingford Brook which flows south to Newton Lake LWS.
Mucky Mountains	LWS	1.5km W	Area of grassland and scrub with scattered mature trees.
Crow Lane Copse	LWS	1.7km NW	Broadleaf woodland copse.
Grassland South of Towpath,	LWS	1.9km W	Grassland with scattered scrub and mature trees.

Site Name	Designation	Distance and Direction from Site (km N/S/W/E)	Summary of Reason for Designation
Sankey Valley Park			
Ellams Brook	LWS	1.9km N	Brook lined with mature trees.

Table 4.2: Non-statutory designated sites within 2km of the site.

- 4.19. Given that Newton Brook 05 LWS lies within the site, a buffer between any development and the LWS will be required to ensure that it is protected and potential development complies with national and local planning policy relating to the protection of non-statutory designated sites.
- 4.20. If protection of the LWS is not an option, then there is the possibility of looking into whether the site still would qualify as a LWS (or be restorable) under the Council's LWS designation criteria, however further surveys would be required so see if this could be an option due to seasonal dieback obscuring the presence of habitats and species for which the LWS is qualified. Any development impinging on the LWS would require council approval (given that it would contravene local planning policy) and mitigation would be required. This could take the form of providing replacement habitat, and or management of the remaining LWS to enhance its nature conservation value.
- 4.21. In all cases, a buffer will be required between development to ensure that the brook is protected against pollution and potential run-off both during construction and once the development is operational. This would also ensure that the second closest LWS, Newton Brook 03 is unaffected by activities on site.
- 4.22. Given the size and quantum of development achievable on the site, and residential nature of development proposals it is unlikely that the development would lead to any significant impacts on other protected sites within the search area, from factors such as increased recreational use of publicly accessible nature conservation designations.

Habitats

- 4.23. This section should be read in conjunction with the **Ecology Overview Plan (10786/P03)** that is included at the end of this report.

Arable

- 4.24. The majority of the site comprises a large single arable field that was currently planted with a winter crop at the time of survey. It has an undulating topography with narrow grassland margins of 0.5 - 1m which are dominated by unmanaged rank grassland and ruderal vegetation.
- 4.25. Arable land planted as crop is not considered to be a habitat of ecological importance due to its management and nature, however it could provide opportunity for breeding and wintering birds (see paragraphs 4.3 and 4.4 below).

Tall Ruderal Vegetation

- 4.26. Un-managed, tall ruderal vegetation is present around the perimeter of the site, lining the arable field and also the watercourse that bounds the site to the west. Species present are predominantly bramble *Rubus sp.* and willowherb *Epilobium sp.*



Scattered Trees

- 4.27. Several semi-mature trees are distributed around the perimeter of the site. Species present include birch *Betula sp.* elder *Sambucus nigra*, sycamore *Acer pseudoplatanus*, hawthorn *Crataegus monogyna* and oak *Quercus sp.*
- 4.28. Although these trees are not mature specimens they would not be able to be replaced in the short to medium term. They also break up the otherwise open landscape of the site, provide habitat cover alongside boundary features such as the watercourse and connect to offsite habitats, particularly in the northeast corner of the site. They are therefore considered to be of local importance and should be retained where possible.

Scattered and Dense Scrub

- 4.29. Scattered bramble scrub and areas of more dense scrub with small trees including willow *Salix sp.*, oak, elder and hawthorn are present along the watercourse along the western boundary.
- 4.30. This habitat is unmanaged and comprises common and widespread species, yet it forms a mosaic of ground flora and tree cover along the site perimeter lining the watercourse which provides habitat connections around the site from the north down along the western boundary. It is recommended that this habitat is therefore retained, maintained and enhanced if possible.

Areas of Inundation

- 4.31. There are two large areas of inundation within the site adjacent to the watercourse. These areas look to hold water and flood when the watercourse is running high. Drainage pipes from the field also run through these areas which would also keep them damp, if not holding water, at drier times of the year. During the survey the largest areas was holding shallow water and the north-western area looked to have held water recently.
- 4.32. These areas are vegetated with species associated with wet environments, including reed canary grass *Phalaris arundinacea* and reed mace *Typha latifolia*. Willows are also present near to these areas.
- 4.33. As habitats forming a LWS, these should be protected from development. There is also opportunity to enhance and restore these habitats to improve their condition and extend their longevity.

Watercourse

- 4.34. Newton Brook flows south around the western edge of the site. The channel is approximately 3m wide and is lined by mature trees, scrub and ruderal vegetation. During the survey the water was fast flowing and very turbid.
- 4.35. The brook forms part of the LWS onsite and also connects to other habitat, including those also designated as LWS further downstream. A buffer between development and the brook will be required to protect it from potential pollution and runoff if the site is developed in the future.

Invasive Flora

- 4.36. The invasive Himalayan balsam is also present on site within the field boundaries and particularly lining the watercourse and areas of inundation. As a species listed under Schedule 9 of the WCA it will need controlling to ensure that it does not spread. A further survey to map the extend of this species on site will be required during the growing season.

Fauna

Badger

- 4.37. No evidence of badger *Meles meles* such as latrines, hairs, prints or setts was recorded during the survey. The site does support some potential habitat for foraging but is sub-optimal for sett building, particularly close to the watercourse which is liable to flood. There is evidence of rabbit digging in places along the railway bank however this boundary is quite shallow, open and exposed for sett building.
- 4.38. As badgers can quickly excavate new setts, it is recommended that a badger survey is conducted prior to any development of the site to ensure their continued absence from the site.
- 4.39. Should a badger sett be found within the site prior to the commencement of works, it may be necessary to either provide a suitable buffer (up to 30m) to the sett or to close off the sett entirely if providing a buffer is considered impractical. A licence from Natural England will be required for sett closure works.
- 4.40. It is considered that if badgers are found to be using the site for foraging that there is adequate foraging habitat within surrounding areas and no mitigation would be required.

Bats

- 4.41. The trees on site are not considered sufficiently mature to provide bat roosting opportunities, however, any tree requiring removal should be subject to a thorough ground-based assessment for its potential to support roosting bats. The stone railway bridge bounding the very southern end of the site should also be checked for bat roost potential in more detail if it is to be affected by development (either structurally or through a change in lighting conditions).
- 4.42. The site is likely to be used by foraging and commuting bats as the watercourse and vegetation cover present around the site boundaries is likely to provide an abundance of invertebrates. A search of local ecological records should be undertaken to see if there are any occurrences of bat roosts locally and a bat activity survey would likely be required to inform a planning application.
- 4.43. If a buffer is retained and enhanced through native tree planting between development and boundary features such as the brook, then this also would benefit foraging and commuting bat populations if they are found to be using these features.

Birds

- 4.44. The trees and dense scrub within the site is likely to provide nesting and foraging habitat for a range of common woodland species. This could include priority species such as dunnock *Prunella modularis* and song thrush *Turdus philomelos*. The site could also be used by ground nesting birds such as skylark *Alauda arvensis* due to its open, arable nature.
- 4.45. The site could also provide habitat for wintering birds, both in the adjacent scrub and inundation areas but mainly within the arable field. It is relatively undisturbed apart from farming practices and is close to a watercourse that would be valuable foraging resource during cold winters.
- 4.46. Given the site's suitability for birds, a breeding and possibly wintering bird survey may be required at the site prior to submission of a planning application to inform any potential mitigation which may be required. However, it will be necessary to conduct a review of local bird records and to consult with the LPA ecologist to ascertain if these surveys would be required.



- 4.47. If surveys find that significant bird populations are using the site then mitigation in the form of openspace for ground nesting birds and overwintering populations may be required and given that development would result in the loss of the arable habitat on site, offsite compensation measures may need to be explored. This will need to be discussed with the LPA ecologist and would only be required if significant bird populations were recorded using the site.
- 4.48. All wild birds, their nests and eggs are afforded protection under the WCA 1981 (as amended). As such the removal of woody vegetation during the bird breeding season could trigger this legislation, which protects birds while actively nesting. Development proposals should therefore include measures for timing vegetation clearance and demolition works to avoid the bird breeding season where possible, or other measures to avoid disturbance to breeding birds where works have to proceed whilst birds are likely to nesting.

Great Crested Newt and other amphibians

- 4.49. There are no ponds on site, and although the inundation areas do look to hold water periodically and they are likely to remain damp throughout the year (due to field drainage) they are only likely to hold water during periods of high rainfall and during flood events. There are no ponds located within 250m or within 500m of the site. Potential terrestrial habitat for Great Crested Newt (GCN) *Triturus cristatus* is present within the site in the form of scrub and rough grassland along the site boundaries. However, given that there are no ponds within 500m of the site, GCN are unlikely to be present within the site. Therefore, GCN surveys are not considered necessary to inform a planning application.

Reptiles

- 4.50. The scrub and ruderal habitat within the site's boundaries is considered optimal for reptiles and search of local ecological records should be undertaken to see if there are any occurrences of reptiles locally. Consultation with the local planning authority ecologist should be undertaken to discuss whether surveys for reptiles would be required to inform a planning application.

Water Vole and Otter

- 4.51. The ruderal vegetation and inundation areas and Newton Brook have potential to provide habitat for water vole and otter *Lutra lutra*. Water vole have been cited as present within the LWS citation for the Brook, however the citation also says that surveys would be required to confirm presence. No signs of otter or water vole were observed during the walkover and a more detailed search should be undertaken.
- 4.52. Arable land provides unsuitable habitat for water vole and otter. Therefore, if a buffer is retained between the LWS and any future development within the arable land of the site then it would be unlikely to affect populations if present.

Ecology Conclusions and Recommendations

- 4.53. It is considered that a residential development could be accommodated within the areas currently managed as arable land within the site. However, a buffer will be required along the Brook and its associated ruderal and inundation habitat which is designated as a LWS in order for development to comply with planning policy relating to protecting non-statutory sites and CQL 3 and saved policy ENV 5.
- 4.54. In line with National Planning Policy Guidance it is recommended that a full data search, including the purchase of species records is undertaken alongside surveys for badger, bats, water vole, otter and potentially birds and reptiles are undertaken to inform any future planning application.

- 4.55. Mitigation in respect of badgers, bats and reptiles can normally be easily accommodated within green infrastructure proposals for development. Additionally, if a green buffer is retained and protected to the adjacent ruderal and brook habitat then there is potential that water vole and otter habitat would not be affected.
- 4.56. Mitigation for most breeding birds would be able to be provided within green infrastructure, however, depending on the use of the arable land by ground-nesting birds and wintering birds, this may affect the quantity of development with provision of openspace required for appropriate mitigation if significant populations are recorded. Therefore, offsite compensation may need to be explored if significant bird populations are using the site.
- 4.57. It is considered that with appropriate mitigation, development would still be able to accord with planning policies and legislation relating to wildlife (see policy CQL 3).
- 4.58. There is an opportunity to enhance the site for biodiversity in line with the NPPF and Local policies (CP1, CQL 1, CAS 5 and ENV13) within green infrastructure, tree planting and introduction of wildlife sympathetic SUDS.

5.0 Arboricultural Context

- 5.1. A site walkover was undertaken on 18th January 2017 to review the arrangement, quality and condition of existing tree and hedgerow cover on-site. As stated above, this work does not constitute a full BS5837:2012 Tree Quality Survey, but it does establish the broad distribution and associated development implications associated with arboricultural matters.
- 5.2. The appraisal of trees has been guided by the 'Cascade Chart for Tree Quality Assessment' within Table 1 of BS5837:2012. Categories A, B and C deal with trees that should be a material consideration in the development process. The BS5837:2012 category grading is summarised as:
 - **Category Grading A:** Trees of high quality and value, which are in such a condition as to be able to make a substantial contribution from an arboricultural, landscape or cultural perspective;
 - **Category Grading B:** Trees of moderate quality and value, which are in such a condition as to make a significant contribution from an arboricultural, landscape or cultural perspective;
 - **Category Grading C:** Trees of low quality and value, which are currently in adequate condition to remain until new planting could be established or young trees with a stem diameter below 150mm; and
 - **Category Grading U:** Trees which are in such a condition that any existing value would be lost within 10 years and which should, in the current context, be removed for reasons of sound arboricultural management.
- 5.3. The comments made are based on observable factors present at the time of inspection. No tree is entirely safe given the possibility that exceptionally strong winds could damage or uproot even a mechanically 'perfect' specimen. Although the health and stability of trees in their current context is an integral part of their suitability for retention, it must be stressed that this report is not a tree risk assessment and should not be construed as such. It may also have not been appropriate, or possible, to view all parts or all sides of every tree to fulfil the assessment criteria of a risk assessment.
- 5.4. Any recommendations made for management of the trees (e.g. tree works) prior to the proposed development are not a detailed 'specification' for tree work and should not be considered as such. These recommendations are proposed on the basis that they are advised and undertaken by a qualified arboricultural contractor working in accordance with best practice as, for instance, embodied in BS3998:2010 Recommendations for Tree Work, or in the European Tree Pruning Guide, published in 2001 by the Arboricultural Association and who should be listed in the Arboricultural Association's Approved Contractors Directory www.trees.org.uk.



- 5.5. A lack of recommended work for the wider tree stock does not imply that a tree does not pose an unacceptable level of risk and, likewise, it should not be implied that a tree will present an acceptable level of risk following the completion of any recommended work.
- 5.6. This section should be read in conjunction with the **Arboriculture Overview Plan (10786/P04)** that is included at the rear of this report. The illustrated locations of trees are informed by OS Mapping and Aerial Imagery. A topographical survey was unavailable at the time of the site visit and therefore the locations of trees should be considered as indicative only at this stage.

Planning Policy

- 5.7. Under the Town and Country Planning Act 1990 (as amended) the requirement to consider trees as part of development is a material planning consideration and will be taken into account in the determination of planning applications.
- 5.8. The local policies relating to arboriculture, namely addressing existing tree and woodland stock that will need to be considered as part of any site promotion/emerging development proposals include:

St. Helens Core Strategy (adopted October 2012)

- CP1 'Ensuring Quality Development in St Helens' - safeguards and enhancement of GI and biodiversity;
 - CQL1 'Green Infrastructure'; and
 - CQL2 'Trees and Woodland' - protecting and safeguarding trees, woodland and hedgerows.
- 5.9. Policy CP1 includes a requirement to "*Safeguard and enhance Green Infrastructure, biodiversity and geodiversity and bring these resources into positive management*" and to "*Avoid unnecessary tree loss and make provision for new and replacement planting*".
- 5.10. Further emphasising the requirement to retain and enhance existing vegetation, Policy CQL1 states that "*The Council will protect, manage, enhance and where appropriate expand the Green Infrastructure network*" adding that this will be undertaken by seeking to "*Reinforce the protection of greenways and linkages between sites*".
- 5.11. Policy CQL2 requires developers to "*plant new trees, woodlands and hedgerows on appropriate sites or contribute to off site provision and elsewhere support new planting*" and also seeks the "*Conserving, enhancing and managing existing trees, woodlands and hedgerows*".
- 5.12. The policy adds that "*Where trees are justifiably lost the replacement of trees will be required on at least a 2 for 1 ratio*".

Saved Policies of 1998 Unitary Development Plan (UDP) (saved September 2007)

- ENV 11 'Tree Surveys'
 - ENV 12A and 12B 'Development Affecting Existing Trees'
- 5.13. Policy ENV 11 sets out the requirement to undertake a tree survey "*where a proposal affects a site containing existing trees or woodlands*", "*to enable the effect of the development on the trees to be properly assessed*".
- 5.14. Policy ENV 12A states that "*proposals affecting existing trees and woodlands would not normally be permitted if they would result in significant loss of trees; do not incorporate*

measures for the successful retention of existing trees; and do not make adequate provision for replacement planting to compensate for any losses as a result of development".

- 5.15. Policy ENV 12B reaffirms the Council's requirement to replace lost tree and woodland stock on "at least a 2:1 basis, either within the development site, or in a suitable area nearby, under an agreement between the Council and the developer".
- 5.16. Policy ENV 12B also provides more generalised design advice relating to tree stock, stating that "the Council may impose conditions requiring layouts to provide adequate spacing between existing trees and buildings, taking into account the existing and potential size of trees and their impact both above and below ground level".
- 5.17. Applicable St. Helens Council LDF Supplementary Planning Documents include:
- Biodiversity (adopted June 2011)
 - Design Guidance (adopted September 2007)
 - Trees and Development (adopted June 2008)
- 5.18. The above documents promote the protection, retention and conservation of existing vegetation to address biodiversity and green infrastructure enhancements.

Statutory Protection

- 5.19. As confirmed via telephone on 20th January 2017, St Helens Council have stated that there are no Tree Preservation Orders (TPOs) on or adjacent to the site. No trees on or within influence of the site are located within a Conservation Area.
- 5.20. There are no identified Ancient Woodlands within or adjoining the site (as shown at www.magic.gov.uk, accessed on 23rd January 2017).

Existing Tree Cover

- 5.21. The northern site boundary comprises a mix of low ornamental stock and scattered street trees and garden vegetation forming a variegated residential boundary with mixed domestic management. Stands of bushy cypress *Cupressus sp.* and fir *Abies sp.*, tree planting, a stand of bamboo, with occasional holly *Ilex aquifolium*, elder *Sambucus nigra*, sycamore *Acer pseudoplatanus*, willow *Salix sp.*, dogwood *Cornus sanguinea* and off-site street trees comprising lime *Tilia sp.*, rowan *Sorbus aucuparia* and field maple *Acer Campestre*. Stands of *Cotoneaster* interspersed with holly and cypress are present to the north east of the site with a single beech *Fagus sylvatica* specimen located adjacent to the current field boundary access at the north-eastern corner of the site. Such tree cover is considered to be of generally low arboricultural quality (Category C) but with some collective merit where there is a screening function. A development offset will need to be sought to ensure a sensitive boundary treatment and appropriate incorporation of off-site tree stock.
- 5.22. The eastern boundary rail line vegetation is limited to isolated stands of self-seeded and young sycamore trees and scrub, with denser vegetation located southwards along the eastern site boundary with stands of naturalised oak *Quercus sp.*, elder, birch *Betulus sp* and hawthorn *Crataegus monogyna* with pockets of mature stock present with a moderate arboricultural value (Category B).
- 5.23. The south western, west and northern site boundaries are aligned by the Newton Brook watercourse and contained by a belt of associated riparian vegetation and scattered mature trees. Open green spaces and associated high canopy tree stock located beyond the brook to the west form a verdant backdrop and an arrangement of hawthorn, willow, oak, sycamore and high canopy poplar *Populus sp* trees with a high (Category A) collective value as a cohesive woodland belt. Standing deadwood, ivy cladding, self-seeded younger trees and brambles along the brook side periphery of the site forms a naturalised boundary in varying states of naturalised degradation.



Arboriculture Conclusions and Recommendations

Quality and Condition

- 5.24. Trees are classified with reference to BS5837:2012 criteria to reflect the mixed quality and value of the existing site boundary tree stock. There is a fair degree of adjacent residential amenity value associated with the presence of scattered ornamental trees and roadside vegetation along the northern site boundary, with a collective high value associated with trees and woodland beyond the site to the west providing a verdant enclosure and grouping of mature native tree specimens aligning the Newton Brook. The brookside vegetation of younger self-seeded stock, scrub and standing deadwood is considered to be of lower quality and in a generally poor condition requiring remedial works to thin, supplement and re-stock areas of degraded western boundary vegetation.
- 5.25. Category A trees are denoted by a Green canopy outline on the Arboriculture Overview Plan (10786/P04). Category A trees signify those that provide high arboricultural value to the site and its locality and that which must be accommodated and safeguarded on-site as a priority.
- 5.26. Category B trees are denoted by a Blue canopy outline on the Arboriculture Overview Plan. Category B trees signify those that provide moderate arboricultural value to the site and its locality and that which should be accommodated on-site where appropriate.
- 5.27. Category C trees are denoted by a Grey tree outline on the Arboricultural Overview Plan. Such trees provide limited or transient arboricultural benefits which may be readily replaced. They are of less priority in terms of retention and subsequently represent a minimal constraint in the context of development.
- 5.28. Category U trees, denoted by a dark Red outline on the Arboricultural Overview Plan, are recommended for removal on the grounds of poor arboricultural condition. Typically, such trees are in decline and would not be suitable for retention.

Root Protection Areas and Associated Development Offset Requirements

- 5.29. Mature trees of merit will require a development offset in accordance with calculated Root Protection Areas (RPAs). The RPAs are considered to contain sufficient rooting volume to ensure the survival of the tree and should be left undisturbed in order to avoid damage to the roots or rooting environment surrounding the tree. Particular care is needed regarding the proximity of trees which may become enclosed within new development.
- 5.30. Where any construction activity within or adjacent to RPAs is unavoidable or where works are to be undertaken in close proximity to lower lying canopies, appropriate working methods, including tree protection and signage will need to be sought as a matter of detailed design in order to safeguard trees during the construction phase of the development.
- 5.31. Whilst a BS5837:2012 Tree Quality Survey will address the definitive RPA extents for all trees within and adjacent to the site measuring over 75mm diameter at breast height (dbh), an indication of the likely development offset requirements for existing trees is included on the Arboriculture Overview Plan included to the rear of this report.

Tree Canopy Shading and Associated Development Offset Requirements

- 5.32. Where high canopy trees are present on and adjacent to sites such as this, the RPAs and below ground context of trees should also be considered in association with above ground constraints. The current and ultimate height of any tree also needs to be appreciated in terms of its size, dominance, shade and movement in strong winds. An indication of the likely development offset requirements pertaining to tree canopy shading and associated residential

amenity matters is included on the Arboriculture Overview Plan included to the rear of this report.

- 5.33. Proposed habitable rooms and garden areas will need to be sited to avoid the principle shadowing constraints to reduce tree resentment issues and adverse residential amenity impacts for future site occupants. Retained mature tree cover of merit must also be located outside of proposed gardens to ensure future retention and appropriate management.

Management

- 5.34. There is the potential for disturbance effects associated with increased access to the western boundary brook by people and pets from the new residences. This could result in degradation in habitat quality through increased noise, trampling, littering and potentially fire setting. To avoid such effects, a development offset / buffer may be required along the western edge of a future residential scheme, utilising a mix of long grasses, through scrub, to trees, thereby creating an 'ecotone' habitat. Poorer tracts of brook-side vegetation should be thinned to favour more established stock. Where deadwood is present and deemed appropriate for retention as ecological features this should be reviewed, otherwise poorly attached or any unsafe dead specimens (such features are present across the western edge of the site within standing water) is recommended for clearance.

Summary

- 5.35. Should the site be considered for a future planning application the implementation of a BS5837:2012 survey and assessment work will likely be required for compliance with local planning policy and validation purposes. This work will provide greater detail on the above and below ground characteristics of trees, including their constraints and opportunities in the context of development proposals. A full BS5837:2012 Tree Quality Survey will need to be based on measured topographic survey data in order to obtain accurate locations of trees, detailed measurements of tree canopies, root protection areas (RPAs) and cast shading.
- 5.36. Future development on-site is considered feasible at this stage, but would be limited by the need to accommodate a sensitive boundary treatment and buffer in relation to the adjoining brook-side vegetation where off-site tree stock is likely to cast shading across the western reaches of the site. The residential boundary to the north of the site will also require a sensitive design response to address the shading constraints and root protection areas associated with the adjoining off-site tree stock but there is no overarching arboricultural constraint to development where vegetation can be accommodated at the site boundaries and referenced by way of suitable development offsets.

6.0 Overall Recommendations and Conclusions

- 6.1. It is considered that an appropriate residential development could be accommodated within the site, incorporating a number of measures to ensure that development would be in keeping with the surrounding landscape and townscape character whilst limiting visual impacts and addressing the existing ecological and arboricultural baseline.
- 6.2. A summary of the principle findings is set out below:
- In terms of the Green Belt, when assessed from a landscape perspective the development of the site is well contained by its boundaries and development would not lead to further sprawl. The development would reduce the distance of the strategic gap between residential development at Mill Lane and Winwick Road and Wargrave but the development offset to Newton Brook will push the development towards the centre and east of the site and this gap distance is consistent with the existing gap to the immediate north of the site. The south-western boundary of the site is formed by Newton Brook and associated vegetation which filters views to the immediate south-west and footpath



SN/606 runs alongside the western side of the brook. These existing permanent landscape features would also contribute to the prevention of further encroachment in to the wider Green Belt countryside.

- Although the site is currently open in terms of its use as agricultural land, urban influences are present in the form of views towards the adjacent residential edges and the West Coast Main Line;
- Although the receptors immediately adjacent to the site (users of footpaths SN/658 and SN/606 and residents of Wayfarers Drive and Mill Lane) will experience a change in visual circumstances, receptors within the wider context of the site will only notice a minor change to the settlement and the effects on landscape character will be localised geographically.
- A landscape buffer should be maintained between development and the onsite LWS both to protect the LWS and also to aid in pollution prevention measures to Newton Brook.
- Mature trees and dense scrub should be retained and protected where possible, particularly along the banks of Newton Brook. Tree planting of native species should be undertaken within green infrastructure.
- A full data search (to include the purchase of species records) and protected species surveys will be required for the following species / faunal groups in order to inform what, if any, mitigation and compensation may be required to facilitate development and the need for any further detailed ecological surveys to inform planning:
 - Badger;
 - Bats;
 - Birds;
 - Water vole;
 - Otter;
 - Reptiles; and
 - Mapping of invasive species

It is recommended that the scope of further ecology surveys is agreed with the County ecologist.

- Development parameters will need to consider the future growth requirements of retained tree stock and incorporate the canopy shade implications to ensure adverse residential amenity impacts are reduced across the periphery of the development;
- Existing trees are recommended to be excluded from proposed private gardens and root protection areas surveyed in detail and referenced in the layout across the edges of the site to ensure that on-site development does not impact upon adjacent tree stock which is to be retained; and
- There is scope for enhancements across the western boundary brook-side corridor where poorer quality, scrub and self-seeded vegetation could be thinned and enhanced via management to offer an improved water-side setting to the backdrop of high canopy woodland trees beyond.

- 6.3. With the above conclusions taken into account and with respect to landscape and visual, ecological and arboricultural matters, this site should therefore be considered suitable for residential development and release from the Green Belt.

7.0 Plans and Photoviewpoints

Landscape Context Plan (10786/P01)

Photoviewpoints 1-7 (10786/P02)

Ecology Overview Plan (10786/P03)

Arboriculture Overview Plan (10786/P04)

Landscape Opportunities and Constraints Plan (10786/P09)



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- Site Boundary
- St. Helens District Boundary
- Photoviewpoint Location
- Data plotted from the St. Helens Unitary Development Plan (1998)
- Local Authority Policies**
- Green Belt Policies S1, GB1 & GB2
- Open Space Policies ENV1
- Designations and Listings**
- Data plotted from <http://www.magic.gov.uk> MagicMap.aspx
- Listed Buildings Policy ENV25
- Conservation Area Policy ENV24
- Public Rights of Way**
- Data plotted is public sector information released by the Crown of St. Helens under the Open Government Licence.
- Public Footpath
- Landscape Elements**
- Data plotted from desktop study and field work observations
- Existing Urban Edge
- Key Roads
- Railway Line
- Existing Woodland
- Notable change of topography



Project
 Land at Red Bank, Newton-le-Willows, St. Helens

Drawing Title
 Landscape Context Plan

Scale
 1:5,000 @ A3

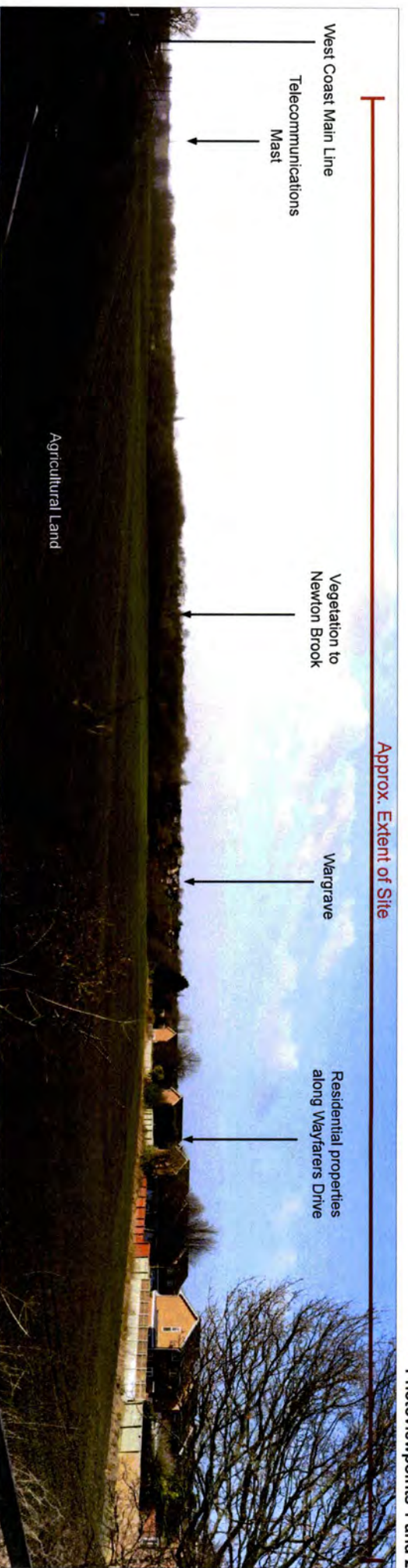
Drawing No.
 10786/P01

Date
 January 2017

Checked
 LMW

Tyler Grange

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Photoviewpoint 1: Taken from Mill Lane. Distance from Site: 5m Orientation: west Coordinates: X: 359458 Y: 394853



Photoviewpoint 2: Taken from Public Footpath Ref. SN/606. Distance from Site: 105m Orientation: north Coordinates: X: 359063 Y: 394325

Public Footpath Ref.
SN/606

Telecommunications Mast





Approx. Extent of Site

Photoviewpoints 3 and 4



Public Footpath Ref.
SN/658

Photoviewpoint 3:	Taken from Public Footpath Ref. SN/658 the to south west of the site.	Distance from Site:	92m	Orientation	north east	Coordinates:	X: 359042 Y: 394419
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Photoviewpoint 4:	Taken from Public Footpath Ref. SN/658 to the west of the site along Newton Brook.	Distance from Site:	2m	Orientation	east	Coordinates:	X: 359031 Y: 394702
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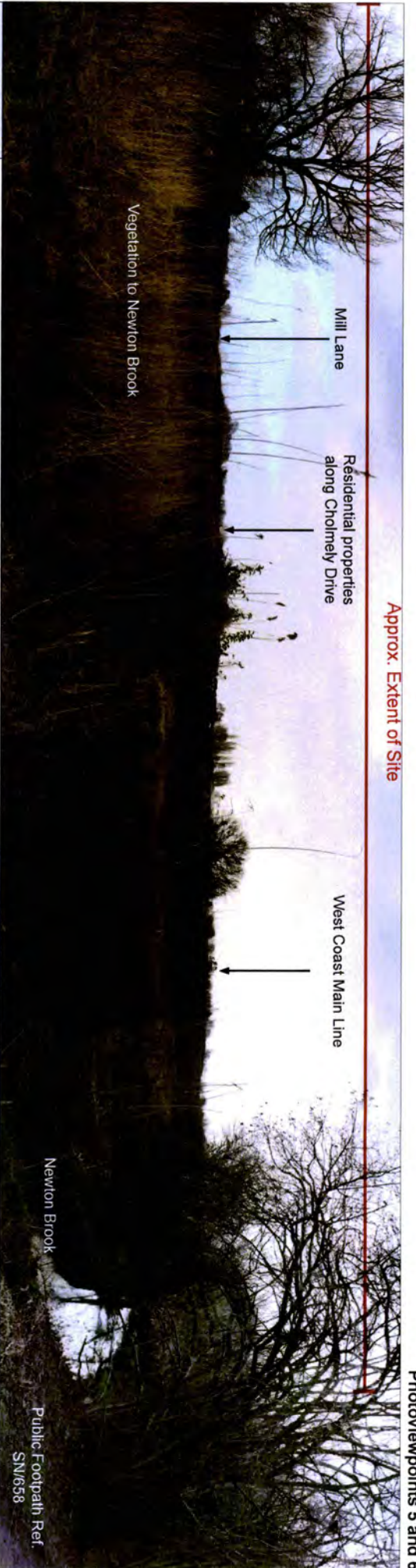
Langfield House, Winton, Cheshire, SK9 1BB
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Photoviewpoints 3 and 4 Drawing Title

Land at Red Bank, Newton-le-Willows, St. Helens

10/26/17
January 2017
Date
Checked

Approx. Extent of Site



Photoviewpoints 5 and 6

Photoviewpoint 5:	Taken from Public Footpath Ref. SN/658 to the west of the site along Newton Brook.	Distance from Site:	5m	Orientation	east	Coordinates:	X: 359059 Y: 394874
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Residential properties along Wayfarers Drive

Vegetation to Newton Brook

Approx. Extent of Site



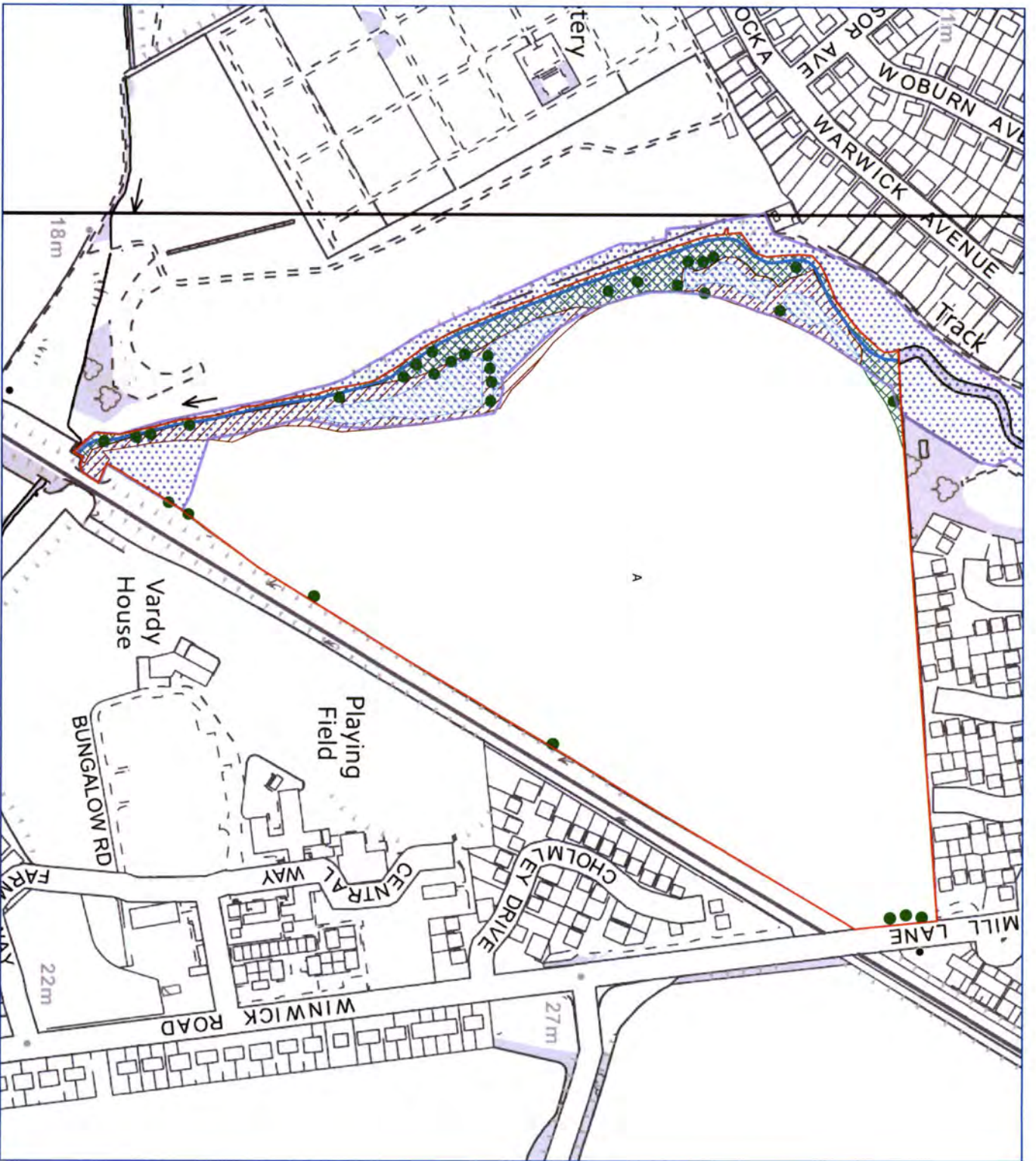
Photoviewpoint 6:	Taken from Public Footpath Ref. SN/658 to the north of the site along Newton Brook.	Distance from Site:	112m	Orientation	south	Coordinates:	X: 359140 Y: 394972
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Photoviewpoint 7

Approx. Extent of Site



Photoviewpoint 7:	Taken from Wayfarers Drive to the north of the site.	Distance from Site:	45m	Orientation	south	Coordinates:	X: 359377 Y: 394940
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- Site Boundary
- LWS - Newton Brook 05
- Arable
- Inundation
- Newton Brook
- Scattered Tree
- Scrub dense
- Tall Ruderal



Project
 Land at Red Bank, Newton-le-Willows,
 St Helens

Ecology Overview Plan

Drawing Title
 As Shown (Approximate)
 10786/P/03
 January 2017
 HC/JM

Scale
 As Shown (Approximate)

Drawing No.
 10786/P/03

Date
 January 2017

Checked
 HC/JM

Degraded belt of shrubby hawthorn, willow, alder, sycamore, oak and birch. Bramble clad with naturalised self-seeded shrubby trees and standing deadwood. Low arboricultural quality (Category C) but with some collective merit where there is a screening function. Varying states of naturalised degradation.

Development offset / buffer may be required along the western edge of a future residential scheme, utilising a mix of long grasses, through scrub, to trees, thereby creating an ecotone habitat. Poorer tracts of brook-side vegetation should be thinned to favour more established stock.

On-site mature woodland trees within linear belt of high canopy poplar, willow and oaks with sycamore, hawthorn and alder with ivy cladding, standing deadwood and tracts of bramble clad self-seeded understorey tree stock.

Height - Up to 18m

Linear stand of dead trees, likely willow and alder, within standing water. Remove.

Onsite early mature oak, canopy biased to west with limbs removed over rail line.

Height - 9m
Root Protection Area - 4.2m
Recommendation - Incorporate into new boundary planting scheme

Naturalised stand of rail-side elder, hawthorn, oak, birch and sycamore. Self-seeded bushy form with scattered mature sycamore.

Height - Up to 12m
Recommendation - Incorporate into new boundary planting scheme

Self-seeded stand of young sycamore. Low value stock beyond eastern site boundary.

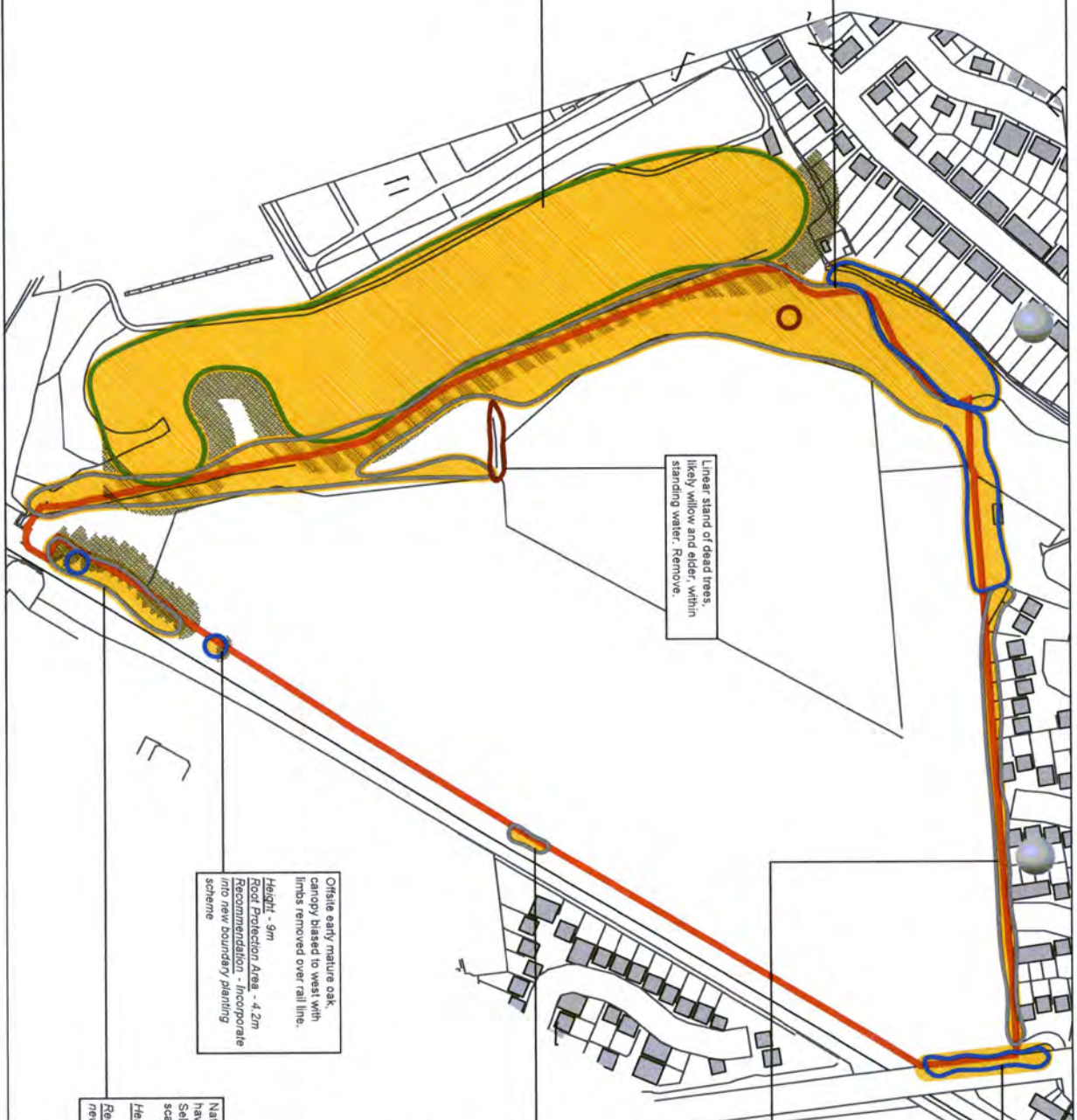
Height - 2m
Root Protection Area - 0.6m
Recommendation - Incorporate into new boundary planting scheme

Mixed residential boundary of low ornamental shrubs, scattered trees and street tree planting. Mixed domestic management. Cypress, sycamore, willow, bamboo, field maple, limes, elder, holly, fir, rowan and dogwood.

Detailed assessment of root protection areas required to ensure suitable development offsets along northern site boundary.

Mixed onsite roadside stock with ornamental cotoneaster, cypress, beech hedgerow and holly planting. Naturalised hawthorn and mature oaks present within roadside embankment.

Height - Up to 10m
Root Protection Area - Mixed 6m from large oak stem, 2.4m average
Recommendation - Incorporate into new boundary planting scheme.



-  Site Boundary
-  Category A - Trees of high quality and value
-  Tree Shadow Constraints (indicative)
-  Category B - Trees of moderate quality and value
-  Indicative Extent of BS5837 Calculated Root Protection Areas (RPAs)
-  Category C - Trees of low quality and value
-  Category U - Poor / Dead specimens recommended for removal

Arboriculture Overview Plan

Scale 1:2500 @ A3

This document should not be relied on or used in circumstances other than those for which it was prepared and for which Tyler Grange was appointed. Tyler Grange accepts no responsibility for this document to any other party other than the person by whom it was appointed. All RPA, shading and vegetation locations are approximate in the absence of measured topographic survey data.

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Project: Land at Red Bank, Newton-le-Willows
Drawing No: 10786/P04
Date: January 2017
Checked by: AL



The incorporation of a green buffer along Newton Brook would satisfy ecology requirements and would provide opportunities to create an area of public open space with groups of tree and shrub planting to filter views from Public Footpath SN/658 to the west of the site and SN/606, and the wider Green Belt landscape to the south.

Development should be focused towards the east adjacent to the existing settlement edges where it will be best associated with the existing built form.

- Site Boundary
- Existing Woodland
- Proposed Landscape Buffer
- Proposed Development Parcel
- Public Footpath
- Views



Project
Land at Red Bank, Newton-le-Willows,
St. Helens

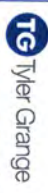
Drawing Title
Landscape Opportunities and Constraints

Scale
1:5,000 @ A3

Drawing No.
10786/P09

Date
January 2017

Checked
LHMAL



Tyler Grange
Landscape Solutions, Winsford, Cheshire, SK9 1BB
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EP3

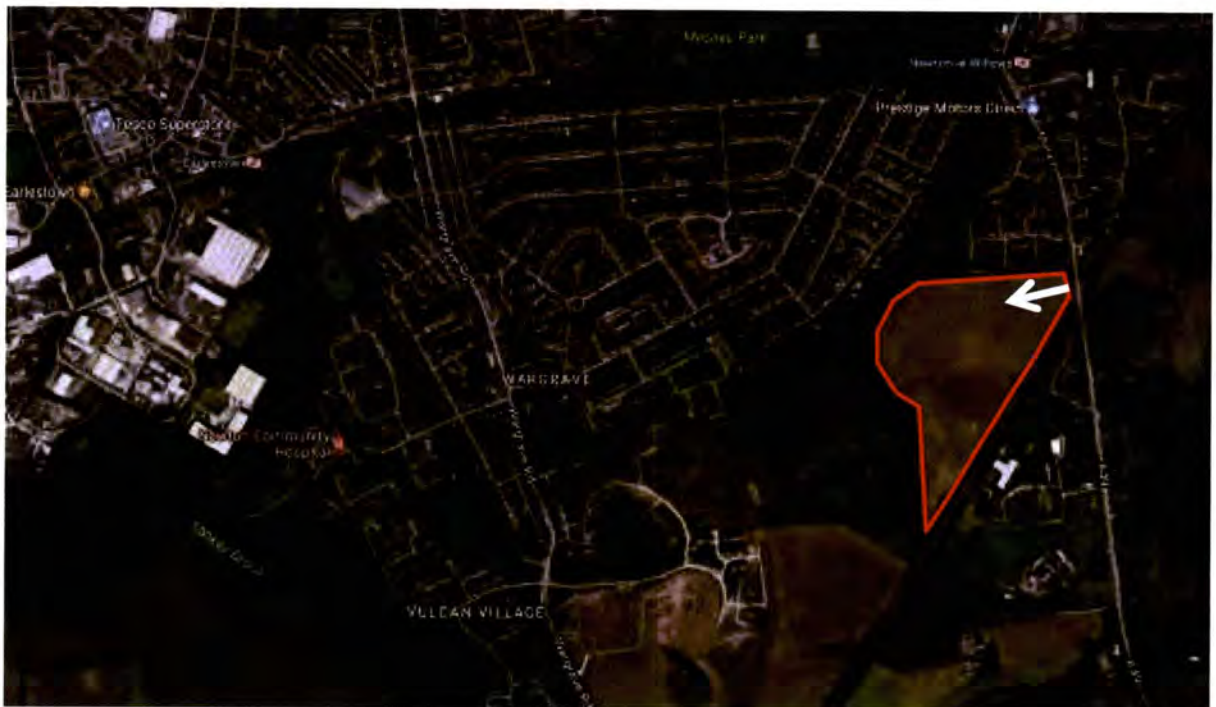
TECHNICAL NOTE

Proposed Residential Development

Red Bank, Newton-le-Willows

DR/17022/TN03 - 27 January 2017

1. We are instructed to advise on the transport aspects of the proposal to provide a residential development on the site identified below, known as Red Bank in Newton-le-Willows:



2. The site has a frontage to the A49 to the east where access is proposed to be taken from. The site is also bounded by residential development to the north, the west coast railway line to the south east and Newton Brook to the west.
3. The site is at a lower level than the A49 on the frontage and the access will be created a raised junction within the site, up to the A49. There is a good width of frontage available to create a high standard of access in this location.
4. The site is well located in relation to existing residential and there is a convenience store and public house within 500m of the site. A primary school is located within 1km of the site.
5. Bus service 22 passes the site and provides hourly connections to Warrington, Newton-le-Willows and Earlestown. Bus service 360 also passes the site and provides 2 buses per hour to Warrington, Newton-le-Willows, Golborne and Wigan at 30 minute intervals throughout the daytime.

6. Newton-le-Willows rail station is some 400m north of the site and provides direct regular connections to Chester, Liverpool, Manchester Airport, Manchester city centre, St Helens, Warrington and Runcorn.
7. This is an accessible site from and there are no obstacles to the successful delivery of this site from a transport point of view.

EP4



Baldwin Design
Consultancy Ltd

Revision: Rev A - Amended to client comments 03.01.19

Project Title:
Residential Development
Address:
**Redbank,
NEWTON-LE-WILLOWS.**

Drawing:
Proposed Sketch Site Layout

Drawing No:
TW/RNW/SU/01

Drawn: STB Date: 14/12/18
Scale: 1:1000 Paper Size: A1

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REDBANK, NEWTON-LE-WILLOWS.

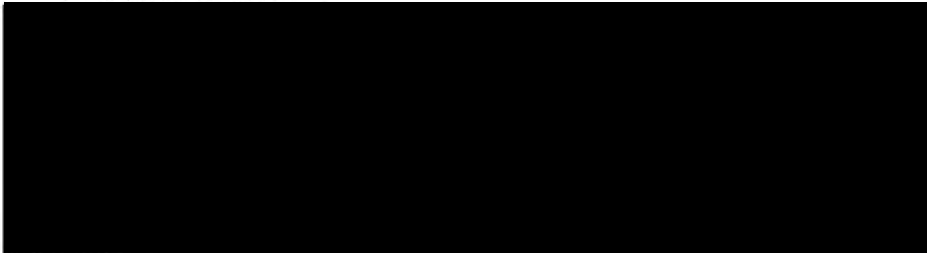
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SITES - 8HA, 3HS, 8HS, 6HS, 7HS



St Helens Local Plan 2020-2035 Submission
Michael Wellock
to:
planningpolicy
13/03/2019 16:37



- ① - LPA02
- ② - GEN
- ③ - LPA04
- ④ - LPA04 (PARA 4.12.1
↓
4.12.1)
- ⑤ - LPA05
- ⑥ - PARA 4.6.10
- ⑦ - GBR
- ⑧ - LPA06
- ⑨ - GBR - SITE 8HA
- ⑩ - GBR - SITE 3HS
- ⑪ - GBR - SITE 8HS
- ⑫ - GBR - SITE 6HS
- ⑬ - GBR - SITE 7HS
- ⑭ - PARA 1.7.2

3 Attachments



SHLP SHGBA Version 5 13.03.19.pdf PE_Report_GBP_StHelens_Final_1000319.docx



SHGBA_St_Helens_LP_Economist_Report.pdf

Dear Sir/Madam,

Please find attached submissions prepared on behalf of Saint Helens Green Belt Association.

Please could you acknowledge safe receipt of this email.

We have also been alerted to the fact that the consultation period may be extended - if so, we reserve the right to make further submissions during this period should the need arise.

The Association will be seeking to appear at any future examination.

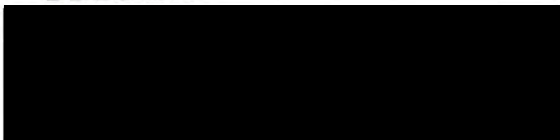
Yours faithfully,

Michael

--

Michael Wellock
Managing Director

Kirkwells
Lancashire Digital Technology Centre
Bancroft Road
Burnley
Lancashire
BB10 2TP



ELO243

St. Helens Borough Local Plan 2020-2035 Submission Draft – SHGBA Response, March 2019

**St. Helens Borough Local Plan 2020-2035 Submission Draft
Response on behalf of St. Helens Green Belt Association (SHGBA)**

March 2019

Kirkwells

The Planning People

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1.0 Introduction

1. This submission on the St. Helens Borough Local Plan 2020-2035 Submission Draft (henceforward “Submission Draft”) has been prepared by Michael Wellock BSc, Dip TP, DMS, MRTPI of Kirkwells, independent chartered town planning consultants, on behalf of St Helens Green Belt Association (SHGBA) – this includes Eccleston Community Residents Association, Rainford Action Group (RAG) and Rainhill Save Our Green Belt (RSOGB).
2. This submission also provides an overall planning submission to complement and expand on the related submissions, submitted on behalf of SHGBA by other technical experts: Piers Eias on demography; and Dr. Glen Athey on economics; and it also complements the individual submissions of the local groups (where made) that deal in detail with local issues.
3. This submission will demonstrate that the Submission Draft fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):
 - a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.”

Footnote 19: “Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of this Framework.”

4. This submission will also show that St Helens Borough Council (“the Council”) has failed to meet legal requirements in preparing the Submission Draft.
5. The concluding section of this submission sets out the recommended modifications that should be made to make the St Helens Local Plan 2020-2035 sound.

About SHGBA

6. St Helens Green Belt Association (SHGBA) comprises several action groups campaigning against the St Helens Local Plan in Merseyside. It comprises Eccleston Community Residents Association (ECRA), working in conjunction with Windle Residents, Rainford Action Group (RAG) and Rainhill Save our Green Belt (RSOGB).
7. ECRA, RAG & RSOGB are newly formed action groups, set up following the publication of the St Helens Local Plan Preferred Options in December 2016 (SHLPPO 2016). ECRA, RAG, & RSOGB were formed to campaign against the proposal to reallocate Green Belt land for employment and housing development and has a strong following and the support of many residents and local businesses. Around 5,500 residents and organisations responded to the SHLPPO 2016 consultation, over 90% objecting to the SHLPPO proposals.
8. The SHGBA are working in conjunction with other like-minded campaign groups across St Helens as well as the Lancashire Branch of the Campaign to Protect Rural England (CPRE).

9. The SHGBA groups support Local Plan led sustainable development. It is not against industrial and housing development where there is genuine need and it is sustainable.

10. However, the SHGBA groups are strongly opposed to unnecessary Industrial and Housing development on Green Belt land. It fully supports the CPRE view, in line policies in the National Planning Policy Framework (NPPF) that Green Belt, Greenfield and Green Space land is essential to quality of life and the health and wellbeing of the community.

2.0 St. Helens Borough Local Plan 2020-2035 Submission Draft

Introduction

11. The Submission Draft sets out an aspirational strategy for the Borough. This includes:

- Planning for an additional 215.4 hectares of land for employment development between 1st April 2018 and 31st March 2035;
- Over the period 1st April 2016 to 31st March 2035, planning for a minimum 9,234 net additional dwellings, at an average of 486 dwellings per annum;
- Releasing land from the Green Belt for 2,056 new homes¹; and
- Identifying 85.88² hectares of safeguarded land for employment and 148.34³ hectares of such land for housing.

Spatial Strategy

12. In setting out this very aspirational strategy for St Helens there is one notable omission from the Submission Draft Spatial Strategy. This is the failure to highlight the great importance government attaches to Green Belts (NPPF, paragraph 133). The “essential characteristics of Green Belts are their openness and their permanence” (*op. cit.*). NPPF also sets out the 5 purposes of Green Belt (NPPF, paragraph 134). The Submission Draft Spatial Strategy (Policy LPA02, page 17) makes no mention of the “great importance” of Green Belt, its essential characteristics or purposes. The Strategy fails to deal with the strategic elements of Green Belts, only dealing with the development management policy for Green Belt contained in NPPF paragraphs 143 to 147.

13. The Spatial Strategy, in failing to recognise the great importance Government has placed on Green Belt and its strategic nature, is not consistent with national planning policy and, therefore, not sound. The Spatial Strategy should be revised

¹ Row p, Table 4.6, Submission Draft

² Table 4.7, Submission Draft

³ Table 4.8, Submission Draft

to incorporate references to the significance of Green, the essential characteristics of Green Belt and the five purposes of Green Belt.

1

14. Elsewhere in this submission we conclude that the “exceptional circumstances” which must be Strategy demonstrated in order to justify the release of Green Belt land have not been stated. Based on this evidence (Section 5 of this submission) the Spatial is not positively prepared, justified, effective or consistent with national planning policy. Further revisions of the Spatial Strategy will be needed to make the plan sound. These revisions should include deletion of the following from Spatial Strategy paragraph 4:

1

“This Plan releases land from the Green Belt to enable the needs for housing and employment development to be met in full over the Plan period from 1 April 2020 until 31 March 2035, in the most sustainable locations. Other land is removed from the Green Belt and safeguarded to allow for longer term housing and / or employment needs to be met after 31 March 2035. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan.”

1

15. There is an issue concerning the plan period. The front cover of the plan states the plan runs from 2020 to 2035, the employment policy LPA04 plans for the period 1st April 2018 to 31st March 2035 and the housing policy LPA05 runs from 1st April 2016 to 31st March 2035. Whilst the end dates are the same, the plan should be amended to include a consistent start date, so that it is clear what is the plan period for the Local Plan.

2

3.0 Economy

National Planning Policy

16. National planning policy sets out that “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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 approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.” (NPPF, paragraph 80).

17. When preparing planning policies NPPF paragraphs 81 and 82 provide further guidance for plan-makers:

81. Planning policies should:

a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period (**see paragraph 10 of this submission for our comments on the plan period**);

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

82. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-

driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

Economic Forecasts

18. The Council’s planning policies for the economy are extremely aspirational. They are based on data derived from the *Oxford Economics Forecasts*. These forecasts are themselves optimistic and are based on the premise that by releasing Green Belt land, economic growth will be stimulated. This is not an objectively assessed need, it is speculative supply with a view to creating a need. This conclusion is borne out in the work of Dr Athey (economist, My Local Economy) who states:

“Documentation would suggest that these forecasts are ‘policy-led’ and not ‘objectively assessed’, and are, in any case out of date – along with a number of other assumptions underpinning employment land policies, including forecasts of port freight.” (Athey, paragraph 2.1)

19. Rather than set out an Objectively Assessed Need (OAN) using projections from past data e.g. BE Group’s baseline figures in the *Employment Land Needs Study Addendum Report* (January 2019), the Council have taken that objectively assessed baseline figure and added in land that can only come forward by an inflated assessment of need in the Submission Draft. This is largely based on the assumed need to meet projected jobs forecasts, which themselves are based on assumptions about land supply. A circular argument. The Council need to return to a more realistic OAN for employment land based on the evidence available from past take-up rates.

Transparency

20. A further problem arises in relation to the *Oxford Economic Forecasts* in that they are not publicly available. Dr Athey concludes:

“However, whilst the Oxford Economics forecasts are integral to the Liverpool City Region SHELMA, and are referred to in documents supporting the SHBC Local Plan, and the LEP Economic Growth Strategy, the forecasts are not available publicly to appraise. The forecasts, data, and details about assumptions or methodology are not publicly available and were not available to support the SHBC draft local plan or the public consultation. (Athey, paragraph 4.2)

21. Formal enquiries made to the Council have not resulted in the *Oxford Economics Forecasts* or data being provided or made public. This data is not publicly available for scrutiny, yet underpins the LCR SHELMA, and all subsequent local plans in the Liverpool City Region. It is highly unusual to have such forecasts, material to the planning policies, not being made publicly available. The Council were asked to supply these documents on a number of occasions, but the documents/data have not been provided.

22. This raises a soundness issue. To be sound plans have to be justified i.e. “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”,. Without access to supporting evidence the Council cannot demonstrate that the plan is justified. The Submission Draft is based on evidence that is not verifiable and, therefore, the Plan cannot be demonstrated to be sound without publication of the evidence used as its basis.

Circular Argument

23. As well as issues of transparency it is clear that the Council’s forecasts are based on a circular argument with assumptions about land supply, including release of Green Belt being justified to provide employment. As Dr Athey quotes from the *Employment Land Needs Study Addendum Report*, January 2019 (pages 10-11):

“This modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focussed on logistics and warehousing schemes, including the potential Green Belt

sites around Haydock, west of Omega and Parkside West and East.
(Athey, paragraph 2.3)

24. What is clear is that by the Council setting the criteria for the “Transformational Growth” Scenario in the *Oxford Economics Forecasts*, including the use of Green Belt land to provide employment sites, one of a range of policy scenarios has been chosen instead of an objectively based needs assessment of economic and market trends. This creates a circular argument more land for employment creates more jobs, more jobs justify more land for development. There are other reasonable alternatives, based on other policy scenarios, but these are rejected as not aspirational enough e.g. using the long-term land take-up for the period 1997-2015 of 4.9 hectares per year.

3

25. The Council’s own evidence prepared by BE Group is revealing in this respect. In the *Employment Needs Study Addendum Report* (Amended January 2019). This states that the OAN for employment land was “forecast by looking at past take-up and considering job forecasts for the study” (*Employment Needs Study Addendum Report*, paragraph 1.3) (my emphasis). As has already been stated, the job forecasts include assumptions about significant future release of land through planning policy (see *Employment Needs Study Addendum Report*, paragraph 2.17). BE Group then compare this jobs figure with past land take-up and conclude that the area of land to be developed on that basis would not be sufficient to deliver the jobs forecast: a circular argument. Assumptions about future land provision having influenced the job forecast are then employed to justify release of additional employment land.

3

26. This reasoning can be seen in the *Addendum Report*. In that document the BE Group state that “past take-up of employment land was considered to be the preferred basis of forecasting of the employment OAN”. They then point out that this past take-up has not been constant and that some periods had less growth. This is not considered to be unusual, the local economy and national economy goes through periods of growth and recession.

27. BE Group choose two long-term take-up periods 1997-2015 and 1997-2012. The former had a land take-up rate of 4.9 hectares per year, the latter 5.8 hectares per year. ✓

28. The period 2011/12-2015 is excluded from the 1997-2012 baseline on the basis that “there was a lack of adequate market attractive supply. This is “cherry picking” data to suit the Council’s aspirations. As previously stated, economies have periods of growth and contraction. The long-term 1997-2015 data should be used. ✓

29. In the *Addendum Report* these two long-term take-up periods are then used to generate two baseline figures for the 25-year period, 2012-2037. On the 4.9 hectares per year scenario this generates a baseline of 122.5 hectares, but a 5-year buffer is added of 24.5 hectares, leading to a total figure for 2012-2035 of 147.0 hectares. Using the 5.8 hectares per year, with a 5-year buffer results in 174.0 hectares 2012-2035. To these two baseline figures of 147.0 and 174.0 an additional land for major projects is added of 30-40 hectares. ✓

30. A more reasonable approach would have been to have taken an evidence based i.e. using the long-term 1997-2015 past take-up rate figure for the OAN. This reflects the ups and downs of the economic cycle. **The OAN figure for employment land should be 4.9 hectares per year, 122.5 hectares over St Helens suggested plan period.**] (3)

31. However, a further issue with the Council’s approach is the use of the time period 2018-2037 for employment land needs. This is different from the housing figures (2016-2035) and different again from the plan period on the cover of the Submission Draft 2020-2035. Unfortunately, what has gone has gone. St Helens cannot plan for the past. There is nothing in national planning policy to say that employment land, perceived as having in some way been missed out on by St Helens, should be rolled forward into future plans. This may have some rationale and support in national policy when considering housing, for example, say to meet the assessed need of people living in the Borough whose housing needs are currently unmet. But, with regard to employment land, no such argument ✓

pertains. **The Plan period for employment land should be consistent with other parts of the plan e.g. housing, 2016-2035. On this basis, and using 4.9 hectares the baseline OAN should be a total of 93.1 hectares.**

3

32. The *Addendum Report* also adds in assumptions for large strategic sites. It is accepted such sites may need to come forward and be added to the employment land requirement in Policy LPA04, 2. Such sites should be identified, if in Green Belt, as part of a selective review of Green Belt to meet the need for such strategic sites.

33. There is no justification for an additional five years of supply, this is an arbitrary figure and should be deleted.

3

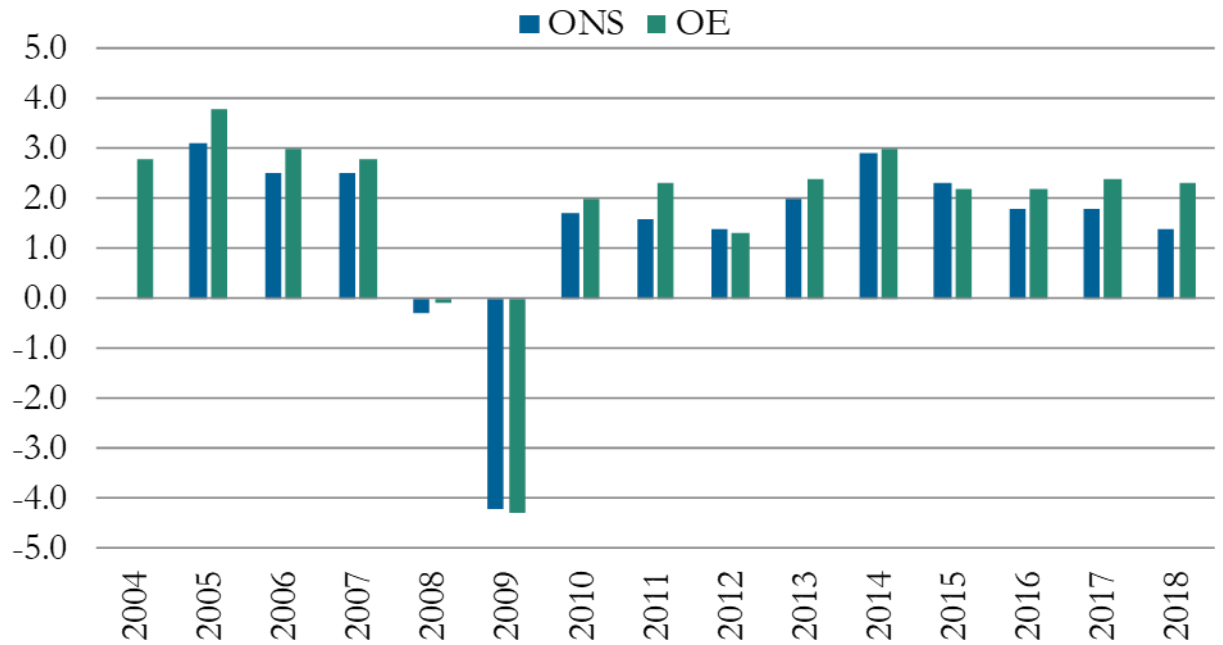
Out of Date Forecasts

34. The third issue relates to the Council's economic forecasting made in 2016. They are now out of date. Compared with the evidence on economic growth over recent years (2015 to 2017), they are extremely over optimistic.

35. The Oxford Economic model uses national economic growth rates to inform forecast local growth rates. For example, Oxford Economics has projected the UK rate of growth at 2.2 per cent (2016), 2.4 per cent (2017) and 2.3 per cent (2018) compared the actual out-turn, as estimated by the Office for National Statistics at 1.8 per cent (2016), 1.8 per cent (2017) and 1.4 per cent (2018).

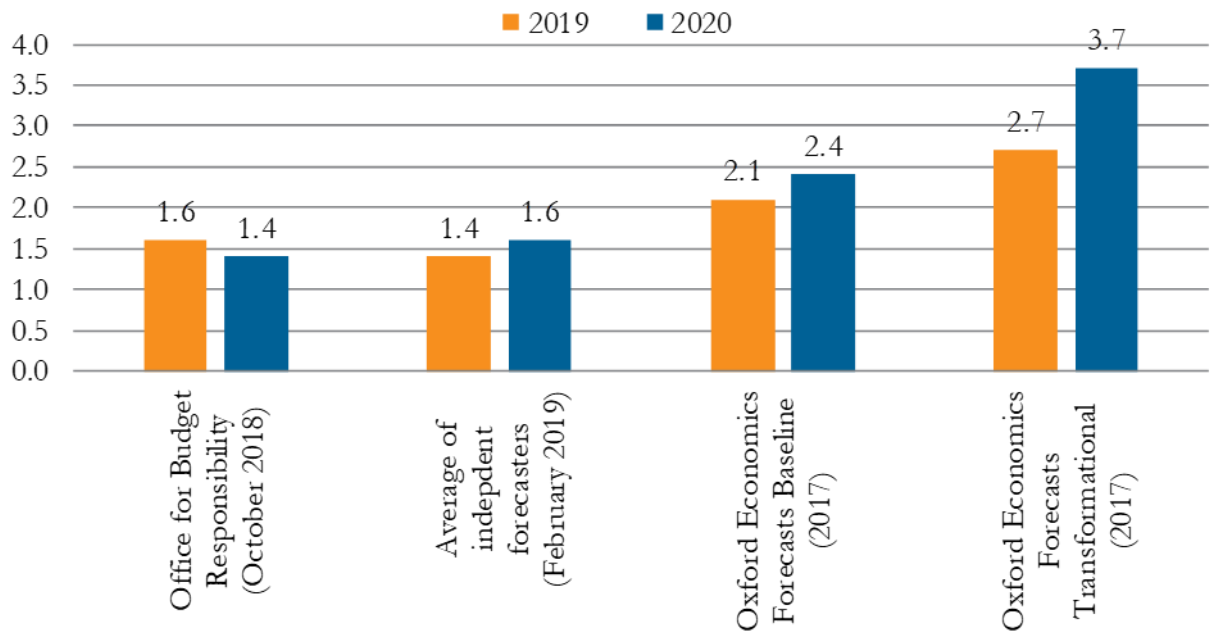
36. Similarly, looking forward, in 2016, Oxford Economics forecast 2.1 per cent growth for 2019 and 2.4 per cent growth for 2020 in its baseline scenario, and 2.7 per cent and 3.7 per cent growth in 2019 and 2020 respectively in its Transformational Growth Scenario. Both scenario forecasts are very optimistic compared to recent forecasts by the Office for Budget Responsibility (in October 2018) of 1.6 per cent growth in 2019 and 1.4 per cent growth in 2020. These are shown in Figures 2 and 4 of Dr Athey's submission reproduced below as Figures 1 and 2:

Figure 1. Comparing Oxford Economics Forecast with Office for National Statistics Estimates of GVA Growth (Per Cent)



Source: Office for National Statistics and Oxford Economics.

Figure 2. Comparing Short-Run Forecasts for the UK Economy



Source: Office for Budget Responsibility, HM Treasury, Oxford Economics.

37. In addition, the 2016 Baseline and Growth Scenario forecasts were originated shortly after the Brexit vote and this places them in a very uncertain context. By way of contrast, Oxford Economics' 2017 projections for jobs growth are lower than the historical trend for both Workforce Jobs and employee jobs. This further undermines their perceived accuracy (Dr Athey, paragraph 2.8)

38. The overall conclusion to draw from the Council's evidence and the interpretation of that evidence base is that:

- a) It is not transparent and, therefore, not independently verifiable;
- b) It is based on out dated data;
- c) It is based on a circular, self-fulfilling argument that results from a flawed methodology.

For these reasons a lower OAN for employment land of 93.1 hectares 2016 to 2035 is justified. Larger sites to meet strategic needs can come forward. At this time, as part of a selective review of Green Belt.

Warehousing and Logistics

39. The Submission Draft seeks to secure significant growth in the warehousing and logistics industries. Table 4.2 of the Submission Draft identifies this as within the range 110-155 hectares. There are now considerable doubts about the data underpinning this approach.

Port Freight

40. The UK port freight forecasts used in the Liverpool City Region SHELMA are significantly out of date, this data was published in 2006. A 2019 forecast is now available from the Department of Transport. This forecast projects a much lower growth in freight volumes than the 2006 forecasts. In total, the 2006 forecasts projected a 12 per cent growth in UK port freight compared to an actual contraction of -13 per cent. The 2006 forecasts projected a growth of 12 per cent in port freight between 2020 and 2030, compared to the 2019 forecasts projecting

a single digit 8 per cent growth rate. (Dr Athey, paragraph 2.11). Dr Athey concludes that:

“Since port traffic will drive the need for storage and distribution facilities, this lower forecast for port freight will have significant implications for land use demand, and renders the assumptions behind the LCR SHELMA and St Helens Local Plan questionable.” (Dr Athey, paragraph 4.22). ✓

41. This is further evidence that the Submission Draft Plan is not justified by up to date evidence and that the Submission Draft is not sound.] (4)

Vehicle Production

42. Further assumptions about the growth of UK vehicle production are also out of date, with vehicle production in steep decline since January 2017. This renders the assumptions in the SHELMA and Submission Draft concerning the growth of port freight movements and storage arising from motor vehicles redundant (Dr Athey paragraphs 2.12, 4.24 and 4.25). This is further evidence that the Submission Draft Plan is not justified by up to date evidence and that the Submission Draft is not sound.] (4)

Sub-Regional Context

43. Based on the *Addendum Report* (paragraph 2.14) the forecasts for B8 requirements in the Liverpool City Region are for of 321 hectares of additional land by 2033. ✓

44. If St Helens were to maintain a 16% share of such uses, which it currently has, this would equate to 51 hectares of land for B8 uses by 2033. with a two-year difference in time period (2033 as opposed to 2035). The Local Plan seeks to significantly exceed Liverpool City Region figures, based on Table 4.2 of the Submission Draft by in the region of 100-200%. Whilst it is part of the Council's aspirational strategy there is no evidence that this approach has been discussed or agreed at City Region level.] (3)

4.0 Housing

National Planning Policy

45. In order to support the Government's objective of significantly boosting the supply of homes:

"it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay." (NPPF, paragraph 59)

46. To determine the minimum number of homes needed, strategic policies should be:

"informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." (NPPF, paragraph 60).

47. As a strategic plan-making authority St Helens should:

"establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. (NPPF, paragraph 65).

48. In identifying new land for homes strategic plan-making authorities should have:

"a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of

sites, taking into account their availability, suitability and likely economic viability.” (NPPF, paragraph 67).

49. Paragraph 67 goes on to state that in setting planning policies plan-making authorities should identify a specific supply of:

- a) specific, deliverable sites for years one to five of the plan period;
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

50. The revised NPPF stresses how small and medium sized sites can make an “important contribution to meeting the housing requirement of an area”. To promote the development of a good mix of sites local planning authorities should: “identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved” and “support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes” (NPPF, paragraph 68).

Standard Method

51. Based on paragraph 60 of the NPPF the Council should be using the standard method (SM). This produces an annual dwelling requirement of 468 dwellings per annum (Submission Draft, paragraph 4.18.4). The Council have not used the SM. There are no “exceptional circumstances” to use an alternative method.

52. The Council’s approach is to use a figure that takes into “account the increased employment growth that is likely to result from the development of sites that are allocated for employment development” (Submission Draft, paragraph 4.18.5). This figure is based on economic scenario 2, sensitivity option 3 set out in the SHMA Update 2018 (extended to cover the whole plan period to 2035). This produces an uplift of only 18 dwellings per annum above the SM. (Submission

Draft, paragraph 4.18.8). This marginal figure is not considered to be exceptional circumstances to justify an alternative method to the SM. Given the Council's preferred figure is only marginally different from the SM it does not contain a significant uplift expected from economic growth (Submission Draft, paragraph 4.9.15).

5

53. As we have demonstrated elsewhere there is much doubt regarding the veracity of the method and data underpinning the Council's economic assumptions that are the basis for the Submission Draft. It is now likely that an alternative method based on the most recent demographic data would produce a much lower dwelling requirement. Indeed, the prevailing trend is downward. As Mr Elias sets out in his submission the ONS's own 2016-based Sub-National Population Projection would result in a dwelling requirement of 360 dwellings per annum.

54. Whilst the Sub-National Population Projection 2016-based are the most up to date projections (see Mr Elias's accompanying submission). Government in their response to the Technical Consultation on the NPPF has stated that "using the 2016-based household projections will not be considered to be an exceptional circumstance that justifies identifying a minimum need level lower than those identified by the standard method" (Government response to the technical consultation on updates to national planning policy and guidance, February 2019).

55. The Government response also sets out that "local authorities may not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area" (*Op. cit.* page 6). This applies the policy contained in paragraph 11b of NPPF.

56. The Government clearly recognise there is uncertainty surrounding the projections. As a result, they are now committed to revising the SM over the next 18 months. This will "establish a new approach that balances the need for clarity, simplicity and transparency for local communities with Government's aspirations for the housing market".

57. The clear message is that the SM must be used, unless exceptional circumstances can be demonstrated, and that there is considerable uncertainty surrounding the SM method and, therefore, the figures that it produces in relation to St Helens we suggest that:

- a) The SM must be used, there are no exceptional circumstances to justify another approach;
- b) There is considerable uncertainty regarding the SM and the figures it produces. Mr Elias deals with this in more detail in his submission. Such uncertainty, it may well be that a new SM method and figure emerges before or during the examination of the St Helens Local Plan, is not a sound basis on which to change Green Belt boundaries, boundaries to which Government attaches great importance and that have an essential characteristic of being permanent. We note at this point that without any subtractions that the Council's residual requirement (row e, Table 4.6 of the Submission Draft exceeds the residual requirement (row c). On this level there is no need to identify Green Belt land.

58. Re-working the figures published in Table 4.6 of the Submission Draft using the SM produces the following in Table 1:

Table 1. Re-working of Submission Draft Table 4.6 using SM figure 468 dwellings per annum

	Submission Draft	SHGBA Revised Figure based on SM, 468 dwellings p.a.
a) St. Helens housing requirement (19 years from 1 Apr 2016 to 31 Mar 2035) at average of 468 per year (Standard Method)	9,234	8,892
b) Expected completions by 1 Apr 2020	1,989	1,989
c) Residual requirement over Local Plan period from 1 Apr 2020 to 31 Mar 2035	7,245	6,903
md) Anticipated supply		
e) Total SHLAA supply– 1 Apr 2017 until 31 Mar 2035	7,817	7,817
... consisting of:		
f) Large sites (0.25ha or 5 units and above) - planning permission not started as of 1 Apr 2017	1,581	1,581
g) Large sites with planning permission under construction as of 1 Apr 2017	654	654
h) Large sites with planning permission but stalled as of 1 Apr 2017	289	289
i) Large sites - identified by 2017 SHLAA, no planning permission as of 1 Apr 2017	4,107	4,107

	Submission Draft	SHGBA Revised Figure based on SM, 468 dwellings p.a.
j) Small sites (below 0.25ha / 5 units) (small sites / "windfall" allowance) at 93 per annum – 2017 SHLAA	1,395	1,674
k) Estimated SHLAA supply – 1 Apr 2020 until 31 Mar 2035	6,344	6,623
l) SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18)	794	794
m) Residual SHLAA capacity over 15-year Plan period (1 Apr 20 - 31 Mar 35)	5,550	5,829
n) Required capacity to be found on Green Belt land	1,695	1,074 or other sites following a Plan review
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.)	2,024	There is no justification for assuming a 20% lapse rate.
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	Based on row n – 1,074 – not to be allocated at this time but subject to a Plan review.
q) Total supply over plan period m+p	7,606	5,829

59. We support the Council's use of a windfall allowance and the evidence-based figure of 93 dwellings per annum. This should be applied for the full 18 years of the plan – producing a figure in row (j) of Table 4.6 of 1,674, not 1,395.
60. The shortfall of 1,074 dwellings identified in Table 1 based on the SM or the Council's preferred method does not justify "exceptional circumstances". Based on the figures in row n the shortfall is 2.29 years supply using the SM; or 3.49 years using the Council's preferred method. We would also contend that there is no evidence for the aggressive discounting at row l of 15% and a lower figure, say 7.5% would bring the land to find figure down even more.
61. Given that Government also acknowledge uncertainty surrounding the SM it is instructive to look at what more recent demographic data would mean for St Helens. Based on the SNPP 2016 based figure of 360 dwellings per annum, Table 2. This produces a residual SHLAA capacity above a SNPP 2016 based requirement. The conclusion we draw here is that there is considerable uncertainty about future housing need. This does not provide a firm basis for concluding that "exceptional circumstances" exist for the review of the Green Belt boundary. Given the importance that Government attaches to the Green Belt and their key characteristic of permanence, Green Belt should only be reviewed when the evidence base provides a strong degree of certainty that such action is necessary. Currently it does not.

Table 2. Re-working of Submission Draft Table 4.6 using SNPP 2016

	Submission Draft	SHGBA Revised Figure based on SNPP 2016, 360 dwellings p.a.
a) St. Helens housing requirement (19 years from 1 Apr 2016 to 31 Mar 2035) at average of 360 per year (Standard Method)	9,234	6,840
b) Expected completions by 1 Apr 2020	1,989	1,989
c) Residual requirement over Local Plan period from 1 Apr 2020 to 31 Mar 2035	7,245	4,851
md) Anticipated supply		
e) Total SHLAA supply– 1 Apr 2017 until 31 Mar 2035	7,817	7,817
... consisting of:		
f) Large sites (0.25ha or 5 units and above) - planning permission not started as of 1 Apr 2017	1,581	1,581
g) Large sites with planning permission under construction as of 1 Apr 2017	654	654
h) Large sites with planning permission but stalled as of 1 Apr 2017	289	289
i) Large sites - identified by 2017 SHLAA, no planning permission as of 1 Apr 2017	4,107	4,107
j) Small sites (below 0.25ha / 5 units) (small sites / "windfall" allowance) at 93 per annum – 2017 SHLAA	1,395	1,674

	Submission Draft	SHGBA Revised Figure based on SNPP 2016, 360 dwellings p.a.
k) Estimated SHLAA supply – 1 Apr 2020 until 31 Mar 2035	6,344	6,623
l) SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18)	794	794
m) Residual SHLAA capacity over 15-year Plan period (1 Apr 20 - 31 Mar 35)	5,550	5,829
n) Required capacity to be found on Green Belt land	1,695	-978
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.)	2,024	No longer necessary.
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	No longer necessary.
q) Total supply over plan period m+p	7,606	5,829

62. If the Council disagrees with our conclusions that exceptional circumstances have not been demonstrated for a Green Belt review and they decide to proceed on the current basis using a non-SM it should adopt a more pre-cautionary approach to land allocations for housing that does not, at this time, review the Green Belt. This is justified by the uncertainty surrounding the future of the SM

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and the limited shortfall in terms of land to find, 3.62 years over the plan period, even using the Council's preferred method.

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63. NPPF paragraph NPPG 6.76 sets out that in setting planning policies plan-making authorities should identify a specific supply of:

- c) specific, deliverable sites for years one to five of the plan period;
- d) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

64. Based on this policy the Council should not, and does not need to allocate land for the full plan period. Given the uncertainty surrounding the figures and the future of the SM the Council should:

- a) Identify deliverable sites for years one to five of the plan – this can be achieved;
- b) Identify sites for year 6-10 – this can be achieved.
- c) For years 11-15 commit to an early review of the plan by a specific date.

65. The pre-cautionary approach we set out in paragraph 58 of our submission is being adopted in Leeds where similar uncertainty prevails and has been accepted in the courts in the *Grand Union Investments and Dacorum Borough Council* Judgment [2014] EWHC 1894 (Admin).

66. This pre-cautionary approach avoids the unnecessary release of important Green Belt land and allows such a question, if needed, to be revisited through the plan-making process at a later date.

5.0 Green Belt

National Planning Policy

68. The essential characteristic of Green Belts “are their openness and their permanence” (NPPF, paragraph 133). Government attaches great importance to Green Belts (*op. cit.*) and for plan-making identifies Green Belt as one of the policies in the NPPF that provides a strong reason for restricting the overall scale, type or distribution of development in the plan area:

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶;

Footnote 6: “The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change. (my emphasis)

69. Once established Green Belt boundaries should “only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans” (NPPF, paragraph 136). In preparing Local Plans “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.” (*op. cit.*).

Exceptional Circumstances

70. The Submission Draft sets out no “exceptional circumstances” for the changing of the Green Belt boundary. This the first test to pass before concluding the need for a Green Belt review. The Council have undertaken such a review that does refer to “exceptional circumstances”, the *Green Belt Review*, but these are not included or referred to in the Submission Draft. Paragraph 4.6.10 of the Submission Draft betrays a fundamental flaw in the Council’s approach to Green Belt. This states:

“This [the *Green Belt Review*] has identified sites on the basis of their scope to be developed whilst minimising harm to the overall function of the Green Belt, and their suitability for development in other respects. The criteria used have included their physical suitability for development, accessibility by sustainable transport modes to services and facilities, levels of existing or potential future infrastructure provision, their economic viability for development, and the impact that their development would have on the environment. Further details of this process are set out in the *St. Helens Green Belt Review 2018*.

Green Belt policy does not have a function, it has fundamental characteristics, an aim of Green Belt policy and purposes. **Reference to the function of the Green Belt should be replaced with wording consistent with national planning policy.**

71. Paragraph 137 of the NPPF then goes on to provide important guidance for plan-makers when considering “exceptional circumstances”:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

72. Paragraphs 138 and 139 set out how plan-makers should draw up Green Belt boundaries:

“138. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

139. When defining Green Belt boundaries, plans should:

- a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;

- b) not include land which it is unnecessary to keep permanently open;
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

73. The Submission Draft makes no reference to “exceptional circumstances” when considering Green Belt. This is a significant flaw in the preparation of the plan. Green Belt boundaries should only be changed in “exceptional circumstances” the Council have failed to conclude within the plan that “exceptional circumstances” exist, this is not consistent with national planning policy and, therefore, fails one of the tests of soundness.

74. Before concluding that “exceptional circumstances” exist to change Green Belt boundaries the Council should also, based on guidance in paragraph 137 of the NPPF, be able to “demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.” Perhaps unsurprisingly, given the Council have not demonstrated “exceptional circumstances” in the Submission Draft, this point has also not been addressed. Alternatives were set out in the Preferred Option Draft, but this work is not updated. We have set out how the Council should have considered not allocating the full amount of land and adopting a pre-cautionary approach by allocating for the earlier years of the plan and committing to an early review of the plan. The Council have not considered this option. Again, the Submission Draft is not consistent with the NPPF and fails this test of soundness. This is a reasonable option based on the uncertainty surrounding the housing figures and demographics and the future of the SM.

75. Nor does the Submission Draft address the key issue for plan-makers set out in NPPF of how the implications of paragraph 11bi and the specific identification of Green Belt has been addressed to “protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”. The Council have not concluded in the Submission Draft that “exceptional circumstances” exist and, even if this conclusion has been reached, they have not, as part of any assessment of reasonable alternatives, set out why the policy in paragraph 11bi of NPPF should not apply. The Submission Draft is not consistent with national planning policy and fails this test of soundness.

76. The *Green Belt Review* (December 2018, paragraph 1.11) does set out the Council’s consideration of “exceptional circumstances” to change Green Belt boundaries, namely:

- The Core Strategy identified a need for Green Belt release from 2022 onwards (paragraph 1.12);
- The Core Strategy did not identify a need for Green Belt release for employment uses (paragraph 1.13);
- The Local Plan will have to plan for development needs further into the future than the Core Strategy (paragraph 1.14).
- More housing is needed than in the standard method to support economic growth (paragraph 1.15)
- There is insufficient capacity to meet need for housing on urban sites (paragraph 1.16);
- Slow take-up of employment land is due to restrictions on the availability of sites not lack of market demand (paragraph 1.17)
- The need for at least 215.4 hectares of employment land over the plan period (paragraph 1.18); and
- The inability or desirability of neighbouring local authorities meeting St Helens development requirements (paragraph 1.19 and 1.20).

77. But in deciding that “exceptional circumstances” exist the *Green Belt Review* only deals with paragraph 11 of NPPF in part. Paragraph 1.11 of the *Green Belt Review* quotes paragraph 11a and part of 11b of NPPF:

“11. Plans and decisions should apply a presumption in favour of sustainable development.

For **plan-making** this means that:

- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas,

But does not reference paragraph 11bi which goes on to state: “unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area;

78. The *Green Belt Review* only partially applies national planning policy. **The Council, if it holds to the conclusion that exceptional circumstances exist for a Green Belt review, should set the exceptional circumstances out in the Submission Draft and how the Council have considered the implications of NPPF, paragraph 11bi.**

79. Allowing for the fact that the Council has not fully applied national planning policy contained in paragraph 11bi, when examining the reasons set out in the *Green Belt Review* does not lead to the conclusion that “exceptional circumstances” pertain:

- The Core Strategy identified a need for Green Belt release from 2022 onwards (paragraph 1.12) – **this is no longer relevant the Core Strategy was prepared under a different evidence base and one plan cannot hold its successor to a certain course of action. The Submission Draft needs to be prepared within the contemporary planning framework (NPPF, February 2019) and evidence base. Core Strategy Policy CSS1 Overall Spatial Strategy included the following development plan policy “The general extent of the Green Belt as indicated on the Core Strategy Key Diagram will be maintained in the short to medium term. The detailed Green Belt boundary is shown on the Proposals Map. Any strategic review of the Green Belt will be dependent on work carried out at the sub-regional level”.** This work has not been undertaken;
- The Core Strategy did not identify a need for Green Belt release for employment uses (paragraph 1.13) – **this is not relevant, the Core Strategy did not allocate such land, because there was no evidence to support such a course of action;**
- The Local Plan will have to plan for development needs further into the future than the Core Strategy (paragraph 1.14) – **this is not “exceptional” all successor plans have to plan for a new time period;**
- More housing is needed than in the standard method to support economic growth (paragraph 1.15) – **the Council’s evidence produces a marginal uplift from the Standard Method (468 dwellings per annum as opposed to 486 dwellings per annum). We have set out elsewhere how this figure has limited credibility and it is impossible to agree with the Council’s conclusion that an additional 342 dwellings over the plan period “is needed to achieve economic growth at a level that is more typical of the country as a whole”.** The Council’s link between housing growth and economic growth is no longer evidenced and should be discounted;

- There is insufficient capacity to meet need for housing on urban sites (paragraph 1.16) – **there is sufficient capacity, only by discounting sites can an under-supply be achieved;**
- Slow take-up of employment land is due to restrictions on the availability of sites not lack of market demand (paragraph 1.17) – **this of itself does not need to trigger a comprehensive Green Belt review a selective review can be carried out to identify strategic sites;**
- The need for at least 215.4 hectares of employment land over the plan period (paragraph 1.18) – **this figure is not a need it is an aspirational target;** and
- The inability or desirability of neighbouring local authorities meeting St Helens development requirements (paragraph 1.19 and 1.20) – **the inability of neighbours to meet St Helens needs is a matter of assertion. No statement on how the Council has fulfilled the “Duty to Co-operate” or evidential Statement of Common Ground has been produced. This statement has to be qualified by the fact that St Helens are not using the Standard Method and have an aspirational economic growth target rather than objectively assessed need.**

80. Singly, or in combination, the reasons set out in the *Green Belt Review*, and we note not contained within the Submission Draft, do not constitute “exceptional circumstances”.

81. The *Green Belt Review* employs a fairly standard methodology for such studies with individual parcels of land being assessed against the 5 purposes of Green Belt. We deal with site specific assessments later in this document, but one feature of the Review’s overall methodology needs to be set out and addressed.

82. At paragraph 2.14 of the *Green Belt Review* it is set out how the fifth Green Belt purpose “to assist in urban regeneration by encouraging the recycling of derelict and other urban land” has been assessed. Paragraph 2.14 acknowledges that

the Green Belt in St Helens “plays an important role where it will recycle derelict and other urban land”. But then goes on to state that “there is no firm evidence to establish that the contributions that individual parcels or sub-parcels make in this regard can be reliably differentiated”. A Planning Advisory Service (PAS) study is then used to justify such an approach. This conclusion may well hold for individual parcels or sub-parcels, but it does not hold for the Green Belt in its totality or for large releases of Green Belt parcels simultaneously. In such circumstances, the Submission Draft Plan provides a working example of how Green Belt release of a sufficient scale will act to discourage recycling of derelict and other open land, this will:

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- Act as a disincentive to bring forward the 794 units identified in Table 4.6 in the SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18);
- It will act as a disincentive to bring forward identified large sites, 52.5% of which have no planning permission;
- It will act as disincentive to bring forward contaminated land of which the Borough has a considerable stock; and
- It will act as a disincentive to bringing forward some of the 5,818 dwellings on the Council's Brownfield Register.

83. A further issue with the *Green Belt Review's* methodology is parcelling and inconsistent scoring. Different conclusions e.g. on the importance of agricultural land are employed in different ways for different sites. For some sites these are reason for a higher scores than on others. This is inconsistent and produces inconsistent results. We deal with some of these in the site-specific section of this submission.

7

Safeguarded Land

84. In drawing up new Green Belt boundaries plan-makers should also:

“c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;" (NPPF, paragraph 139).

85. The Submission Draft Local Plan removes 10 areas from the Green Belt under Policy LPA06: Safeguarded land. This general approach, if "exceptional circumstances" were considered to apply, which they do not, would be considered consistent with national policy, where such land is safeguarded to meet longer term development needs well beyond the plan period, making it clear such land is not allocated for development.

86. However, the Submission Draft goes one step further and specifically identifies sites, site areas, their preferred use, and development capacity. This approach is tantamount to allocating the sites and is not consistent with national policy. Should the Council press on that "exceptional circumstances" have been demonstrated for a review of the Green Belt, a point on which we disagree, then the safeguarded land in any future revision of the plan should be made consistent with national policy. To this effect, Tables 4.7 and 4.8 of the Submission Draft should be deleted and the safeguarded land shown as unallocated or white land on the Policies Map. Based on arguments elsewhere in this submission our overall argument is that identification of safeguarded land is unnecessary at this time.

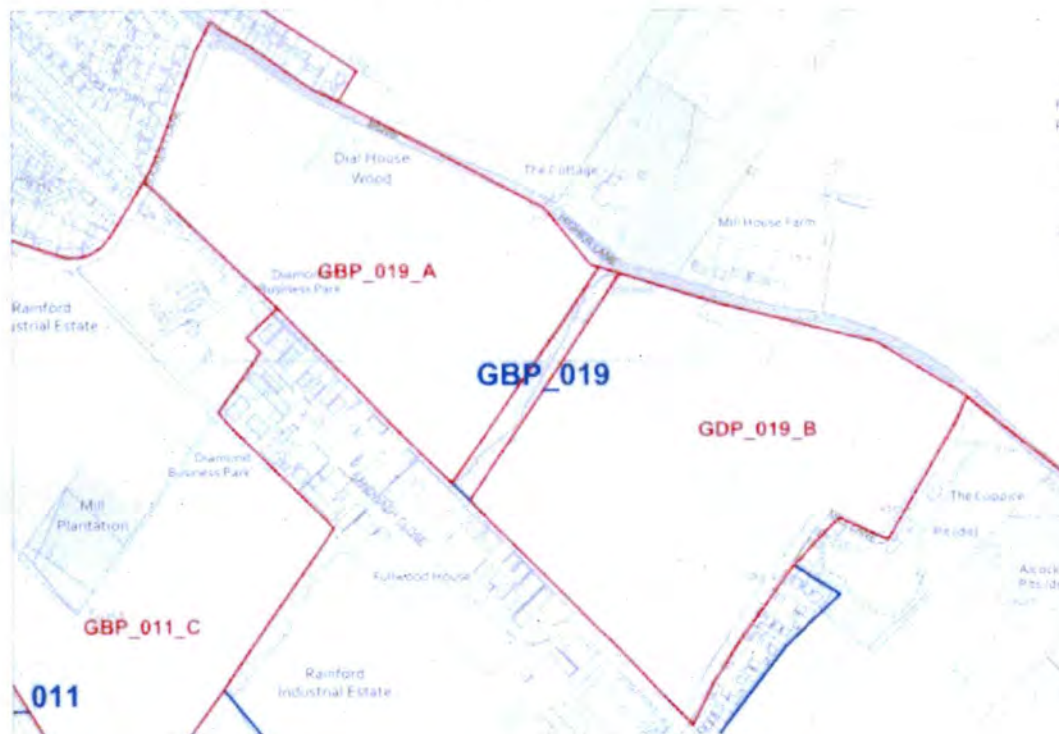
6.0 Site-specific Comments

Land south of Higher Lane and east of Rookery Lane, Rainford

87. This site (*Green Belt Review* Parcel GBP_019a) is removed from the Green Belt and allocated for housing, Site 8HA.

88. Stage 1B of the *Green Belt Review* concludes that sub-parcel (GBP_019a) scores low on all of the four Green Belt purposes against which it is assessed. In the Stage 1B assessment the site is assessed alongside sub-parcel GBP_019b. Despite the geographical and physical congruity of the two sub-parcels a different conclusion is reached for each parcel (Figure 3). Performing a “moderate contribution to the purposes of Green Belt” (*Green Belt Review*, page 216). There is a clear inconsistency of approach in scoring. Both parcels should have been scored in the same way.

Figure 3. GBP_019a and GBP_019b



Source: Green Belt Review, page 214.

89. There are further inconsistencies when it comes to Stage 3 of the *Green Belt Review*:

- a) Site GBP_019a is allocated when close to Rainford Industrial Estate, for this site noise and other potential pollution and amenity issues can be overcome by mitigation, but for other sites e.g. GBP_011c, GBP_013b, and GBP_019b this is an issue for not allocating the sites because of acknowledged noise and air pollution issues. This is inconsistent;
- b) The site is high quality (Grade 1) agricultural land as are other sites in Rainford, including adjoining sub-parcel GBP_019b. Again, there is inconsistency.

90. There is a clear issue regarding the need for separation of the employment and potential housing site in relation to the Rainford Industrial Estate. This is highlighted by an incident on 28th May 2018 when there was a major explosion at one of the industrial units on the site -

<https://www.sthelensstar.co.uk/news/16252575.blaze-at-rainford-industrial-estate/>

91. The two main areas for road traffic accidents in Rainford are at the junction of Mill Lane and the Rainford By-Pass, and at the top of Mill Lane at the junction with Higher Lane. Both of these already dangerous junctions will suffer increased traffic if 259 houses were to be built on as Site 8HA. Any additional road traffic journey would have to use one or other of these two junctions when travelling to St Helens.

92. The site is reasonably well accessed by bus – two services running hourly to St Helens and Ormskirk. But poorly served by rail, Rainford Junction with very limited car parking is two miles away. Where Green Belt is to be released first consideration should be given to “previously developed land and/or is well served by public transport”. This site is neither. **The site should remain in the Green Belt.**

Eccleston Park Golf Club

93. This site is removed from Green Belt and identified as safeguarded land for housing (Site 3HS) with an indicative development capacity of 956 dwellings. This follows consideration as two separate sub-parcels in the *Green Belt Review*, namely:

- a) GBP_086 – Land north of Elton Head Road, Nutgrove; and
- b) GBP_087 – Eccleston Park Golf Club.

94. Both sites form part of a much larger area of Green Belt that runs north west/south east and performs significantly, in Green Belt policy terms, in separating St Helens from Rainhill and Prescott, in Knowsley Borough. This strategic area of Green Belt runs from Eccleston Golf Club in the north east, through St Helens, washing over Bold Heath and continuing to the south east. This strategic nature of this area Green Belt is contiguous with Green Belt in neighbouring local planning authorities. Occupying the north-eastern apex of this significant, strategic area of Green Belt, removal of Eccleston Golf Course (Sub-Parcel GBP_7 and a small area of sub-parcel GBP_086) from the Green Belt would significantly undermine this whole area of Green Belt and lead to the further coalescence of settlements in St Helens (Eccleston and Rainhill) with Prescott in Knowsley.

95. The Stage 1B *Green Belt Review* in its conclusions acknowledges this to a degree, but draws inconsistent, and in our opinion, erroneous conclusions. Sub Parcel GBP_086 is considered to score high in terms of performance when considered against Green Belt purpose 2 – “To prevent neighbouring towns from merging into one another”. In this regard, this sub-parcel plays “a key role in forming a strategic gap and the perception of a gap between Rainhill and Thatto Heath (St Helens core area)” (*Green Belt Review*, page 381). The *Green Belt Review* overall conclusion is that sub-parcel GBP_086 “plays a strong role in maintaining a separation between “Rainhill and Thatto Heath”, it should be borne in mind that the latter is St Helens core area, so this is a significant contribution to Green Belt purposes. It can be added that given the strategic gap the site

occupies it maintains separation of a number of smaller settlements: Whiston, Portico, Eccleston Park and Nutgrove.

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96. Despite being a much larger area of Green Belt at the apex of this large area of north-east south-west running Green Belt separating St Helens from Rainhill and Prescot a whole set of different, inconsistent conclusions are reached about Eccleston Park Golf Club.

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97. This sub-parcel scores low on all 4 Green Belt purposes in the *Green Belt Review*. With the following conclusion drawn on purpose two "To prevent neighbouring town from merging into one another":

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"The parcel currently lies in a Green Belt "gap" between Eccleston Park, West Park, Rainhill and Whiston. However, the gap has already been significantly reduced, due to the merging of Eccleston Park, Rainhill and Whiston on the north western and southern sides. As such there is no longer any visual/perceptual separation of these settlements on the ground. Given the strong boundaries around the parcel which obscure the golf course from any public highway, the parcel provides only a moderate to weak role in preventing further merging. Therefore it is considered that there is no longer a strategic gap between Eccleston Park, Rainhill and Whiston in this location." (Green Belt Review, page 383).

✓

98. These conclusions are inconsistent with those reached on other sub-parcels in this area and erroneous. The Golf Course forms a strategic gap in Green Belt and is part of the wider north-east south-west Green Belt referred to earlier.

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99. The *Green Belt Review* refers to visual/perceptual separation, this is not a characteristic of Green Belt. It is the open nature of the land. This factor should not have influenced the Council's conclusions.

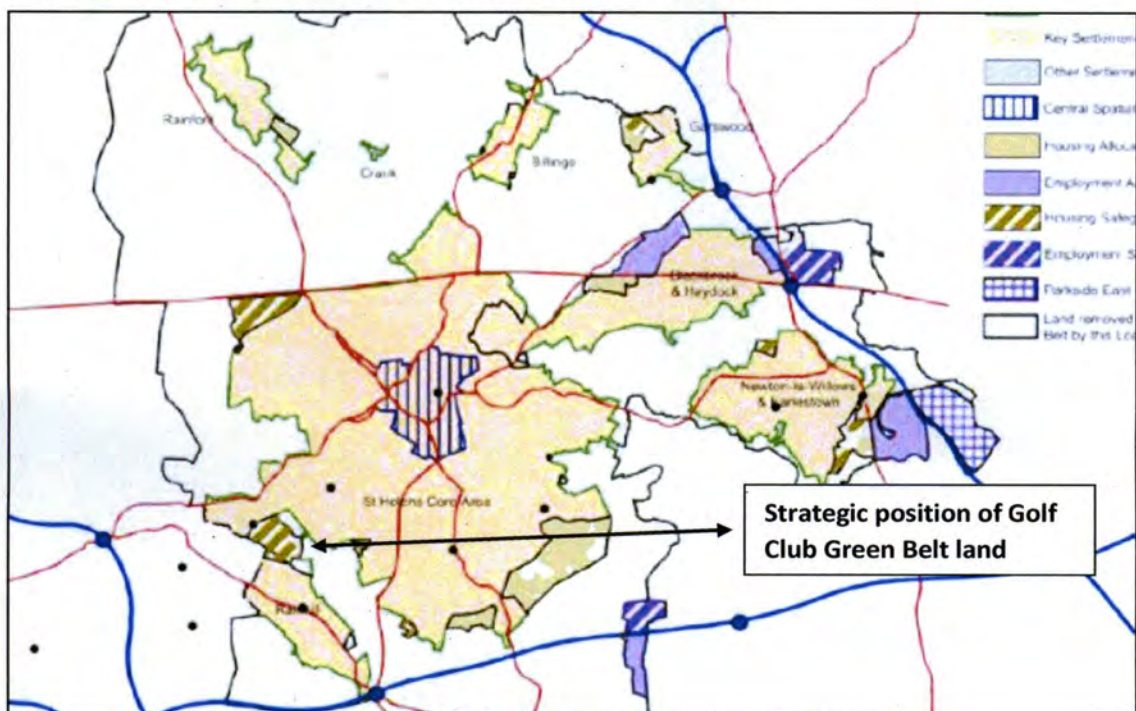
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100. The fact that the Council consider the gap to have been significantly reduced leads to two conclusions. Firstly, that this is acknowledged as a gap, in our view a "strategic gap" that provide a significant area of open land separating and

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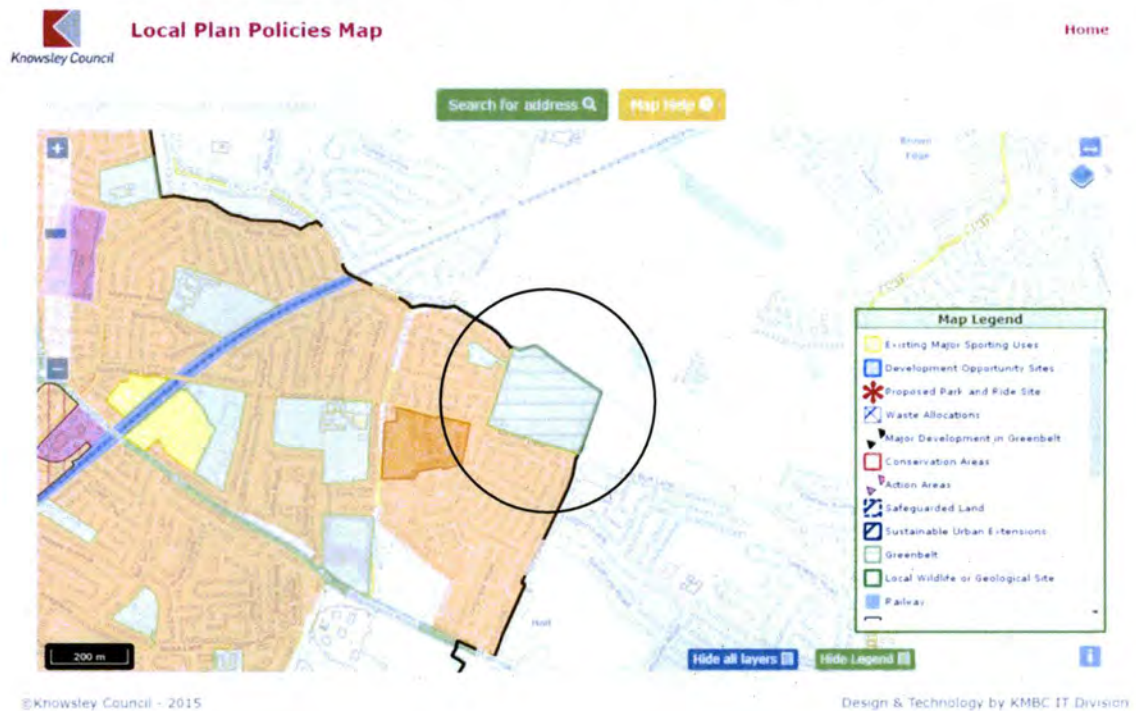
preventing the coalescence of the various settlements in this area. Secondly, the gap has not been reduced. The Green Belt in this area remains unchanged from its original designation in 1983. This area of Green Belt was always a strategic gap and remains a strategic gap. The broader point, of course, is that, if the Council views holds, which it does not, and that the gap has been eroded, then the gap becomes even more significant than when first designated Green Belt.

101. The removal of the Golf Club from the Green Belt will also have implications for the wider integrity of the Green Belt in this area. All that will remain as a “strategic gap” in this key location is sub parcel GBP_088 Land to the north-east of Eccleston Park Golf Club. This sub-parcel is considered to score a “moderate” on purpose 2. Whereas the physically and geographically linked Golf Club a “low”. By introducing such inconsistency, the Submission Draft has reduced this strategic gap to this small parcel of Green Belt. Leaving the Golf Club in the Green Belt will maintain the integrity of this strategic gap. As part of the wider north west/south east strategic Green Belt in this area. Albeit only diagrammatically, this significant change if the Golf Club were to be removed from the Green Belt can be seen on Figure 4.1 Key Settlement Plan of the Submission Draft.



102. A further issue arises with the integrity of the Green Belt in this area in that it impacts on the Green Belt that overlaps the Borough boundary into Knowsley Metropolitan Borough Council. This includes a playing field at Two Butts Lane, Figure 4. As well as undermining the integrity of the Green Belt by leaving only sub-parcel GBP_088 in the Green Belt the Submission Draft undermines the integrity of this area of the Green Belt. There is no evidence to show that this issue has been addressed with Knowsley. Knowsley have not embarked on preparation of their Local Plan: Site Allocations and Development Policies and the Local Development Scheme dating from 2013 is to be updated. The Two Butts Lane site will remain in the Green Belt.

Figure 4. Knowsley Local Plan Policies Map Extract – Two Butts Lane



103. In addition, from the Council's own *Green Belt Review* the following can be highlighted:

- a) Until recently the site was in recreation use. As such it is protected by Core Strategy policy;
- b) Sport England have previously objected to the allocation of this site and the Council acknowledge that "further evidence is

required to meet the requirements of Sport England” (Green Belt Review, page 118). The *Green Belt Review* goes on to state “This further evidence has not been obtained” and that at present “the allocation of the site would conflict with national planning policy”. From what is in the public domain it would appear no further evidence has been obtained;

- c) The site has numerous physical constraints, including electricity pylons, noise issues, various sewers, a trunk water main, The North Prescott Aqueduct and the Vrynwy Aqueduct/pumping station.

10

104. This site should remain in the Green Belt.

**Land south of A580 between Houghtons Lane and Crantock Grove,
Windle**

105. This site is removed from Green Belt and identified as safeguarded land for housing (Site 8HS) with an indicative development capacity of 1,027 dwellings. ✓

106. In the *Green Belt Review* this is sub parcel GBP_098. The Council scores it low on all of the Green Belt purposes assessed. Whilst the geographical location of the sub parcel does mean it will have a lower score in terms of Green Belt purpose 2 “merging”. The Council’s conclusions on purposes 1 and 3 are inconsistent and erroneous. The release of this parcel will see the built-up area sprawl up to the boundary with the A580 and will see the loss of a large area of open countryside, this is particularly evident in views across the site of open agricultural land. Release of this area conflicts with Green Belt policy.

11

107. In the *Green Belt Review Main Report*, the Council acknowledge the following:

- a. The site is high quality (Grade 1 and 2) agricultural land;
- b. The development of this area would form a “sizeable outward extension of the urban area into the countryside, beyond a well-defined urban edge.”;

- c. Significant improvements to highways infrastructure would be required;
- d. A new bus route would be required; and
- e. The site is likely to provide functionally linked habitat for bird species. ✓

108. The site is reasonably well served by bus with a half hourly service during the day, but poorly served by rail. Where Green Belt is to be released first consideration should be given to “previously developed land and/or is well served by public transport”. This site is neither. (11)

109. It is clear from the Council’s own *Green Belt Review* that the site continues to perform well as Green Belt it would if released sizeable outward extension of the urban area into the countryside, beyond a well-defined urban edge.” In a nutshell – sprawl. The site should remain in the Green Belt. (11)

110. **This site should remain in the Green Belt.**

Land east of Chapel Lane and south of Walkers Lane, Sutton Manor

111. This site is identified as safeguarded land as 6HS. Assessed as Green Belt parcel GBP_082 the site is considered by the Council to score low against all the assessed Green Belt purposes. ✓

112. The site is part of the north west/south east line of Green Belt previously described. Its removal from the Green Belt would undermine this strategic area of Green Belt. The Council also consider in the *Green Belt Review* that the three sub parcels forming GBP_082 are “party of a larger strategic gap between Sutton Manor (St Helens core area) and Rainhill.” (12)

113. **This site should remain in the Green Belt.**

Land south of Elton Head Road (adjacent to St John Vianney Primary School), Thatto Heath

114. This site is identified as safeguarded land as 7HS. Assessed as Green Belt parcel GBP_085c the site is considered by the Council to score low against all the assessed Green Belt purposes. ✓

115. This is one area where the Council's parcelling of sites influences results. By stripping out GBP_085c as a small part of the wider GBP_085 parcel, GBP_085c is considered to only make a minor contribution to the strategic purposes of Green Belt. This is self-fulfilling, Different boundaries, of which there are many in this area, would produce different results. As the Council concede on page 378 of the *Green Belt Review*, GBP_085c "sub-parcel forms part of the larger strategic gap between Sutton Heath/Thatto Heath (St Helens core area) and Rainhill". This area should remain in the Green Belt.] 13

116. **This site should remain in the Green Belt.**

7.0 Duty to cooperate

117. No statement on how the Council has fulfilled the “Duty to Co-operate” or evidential Statement of Common Ground has been produced.] (14)

118. National planning policy sets out that:

“24. Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).

26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

27. In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.

119. No statements of common ground have been made available. This makes the plan-making process less than transparent and is not consistent with national planning policy. ✓
120. No statement on how the Council has fulfilled the “Duty to Co-operate” or evidential Statement of Common Ground has been produced.
121. Planning across the region is disjointed and unco-ordinated. There are a number of local authorities pursuing growth agendas. In the Liverpool City Region, there is an opportunity to address this through the Spatial Development Framework to be prepared by the Combined Authority.] (14)
122. In the Submission Draft St Helens set out (paragraphs 4.6.2, 4.6.9 and 4.18.9) that no neighbouring authorities can meet St Helens unmet needs. This conclusion is at odds with the *West Lancashire Preferred Options Draft Local Plan Review* (August 2018). This document (page 22) contradicts such statements, Table 1, row D states that 152 dwellings per annum, a housing requirement of 3,496 dwellings, to meet “remaining unmet housing need from the Liverpool City Region for 2027-2050”. St Helens is, of course, in the Liverpool City Region, this failure to address the potential for West Lancashire to address some of St Helen’s needs raises a significant failure to meet the duty to cooperate.] (14)
123. In this Local Plan, St Helens are seeking a significant proportion of economic development being forecast for the Liverpool City Region, with no evidence to show that this is, or is not impacting elsewhere. Or to show that such discussions have taken place. As we have set out in paragraph 39 of this submission in relation to B1 uses: ✓

“39. If St Helens were to maintain a 16% share of such uses, which it currently has, this would equate to 51 hectares of land for B8 uses by 2033. with a two-year difference in time period (2033 as opposed to 2035). The Local Plan seeks to significantly exceed these Liverpool City Region figures, based on Table 4.2 of the Submission Draft by in ✓

the region of 100-200%. Whilst part of the Council's aspirational strategy there is no evidence that this approach has been discussed or agreed at a City Region level."

124. We have already referenced one area where there is an apparent failure to co-operate, on a small scale, with the issue over Green Belt in Knowsley. Without information being placed in the public domain it is impossible to know whether this issue is being repeated at the large-scale in terms of Green Belt. Despite the Council's Core Strategy policy CSS1, Green Belt is being reviewed piecemeal by local planning authorities, such as St Helens, rather than on a sub-regional or regional basis.

8.0 Conclusions

125. The Submission Draft Plan is not sound and should be amended for the reasons and in the recommended ways set out below.

Not consistent with national planning policy

126. The Submission Draft is not consistent with national planning policy with regard to the following and should be amended as highlighted in bold:
- Exceptional circumstances do not exist for use of a method of calculating Objectively Assessed Need for Housing that departs from the Standard Method (SM). **The Council should use the SM.**
 - The Spatial Strategy fails to recognise key aspects of national planning policy and should be revised to incorporate references to the significance of Green Belt, the essential characteristics of Green Belt and the 5 purposes of Green Belt. **Spatial Strategy paragraph 4 which states: “This Plan releases land from the Green Belt to enable the needs for housing and employment development to be met in full over the Plan period from 1 April 2020 until 31 March 2035, in the most sustainable locations. Other land is removed from the Green Belt and safeguarded to allow for longer term housing and / or employment needs to be met after 31 March 2035. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan.” should be deleted.**
 - The Submission Draft fails to address para 11bi of NPPF and the specific identification in footnote 6 of Green Belt in relation to this paragraph of national planning policy to “protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”. **To reach a proper balanced planning judgement the Council should set out**

how they have considered paragraph 11bi in relation to these aspects of national planning policy.

- The Submission Draft includes no conclusion to show that “exceptional circumstances” exist for review of Green Belt. Exceptional circumstances are addressed in the *Green Belt Review*. From the reasons set out in the *Green Belt Review* we conclude exceptional circumstances do not exist for a review of Green Belt boundaries. **The Submission Draft should be amended to state that the Green Belt will not be reviewed, and the policies and Policies Map should be amended accordingly. The sites referred to in Section 6 of this submission should all remain in the Green Belt. Site-specific, selective release of Green Belt land to meet the need for large, strategic employment sites can be undertaken to meet such needs without the need for a comprehensive Green Belt review.**
- Before concluding that “exceptional circumstances” exist to change Green Belt boundaries the Council should also be able to “demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”. Again, the Submission Draft is not consistent with the NPPF and fails this test of soundness. We have set out how the Council should have considered not allocating the full amount of land and adopting a pre-cautionary approach based on a paragraph 67 of the NPPF by allocating for the earlier years of the plan and committing to an early review of the plan. **This option should be fully considered and offers a sound basis for a revised plan.**
- Green Belt, purpose 5, to support urban regeneration is inadequately addressed, by treating all sites as equal the cumulative impact of large-scale Green Belt releases has not been addressed. This will undermine urban regeneration efforts and is a further reason to support not undertaking a Green Belt Review. **The *Green Belt Review* and Submission Draft should be revised to acknowledge this issue.**
- The Submission Draft approach to safeguarded land is tantamount to an allocation- Should the Council press on that “exceptional circumstances” have been demonstrated for a review of the Green Belt,

a point on which we disagree, then the safeguarded land in any future revision of the plan should be made consistent with national policy. **To this effect Tables 4.7 and 4.8 of the Submission Draft should be deleted and the safeguarded land shown as unallocated or white land on the Policies Map.**

- **The Plan period for employment land should be consistent with other parts of the plan e.g. housing, 2016-2035. On this basis, and using 4.9 hectares the baseline OAN should be a total of 93.1 hectares.**
- **No statements of common ground have been made available. This makes the plan-making process less than transparent and is not consistent with national planning policy. Before the plan proceeds further such statements should be produced and be made publicly available.**

Justified

127. The Submission Draft is not justified, it is not based on proportionate evidence and does not consider reasonable alternatives.

- **The Council have not used the Standard Method. The housing land requirement should be based on the SM.**
- **The Council's economic data is out of date. The Council should re-work the economic base of the plan based on the most up to date data.**
- **The Council's methodology for economic forecasting and calculating employment land is a circular, self-fulfilling argument.**
- **The Council's employment OAN is flawed and aspirational. A more realistic OAN figure for employment land should be used 4.9 hectares per year. The Plan period for employment land should be consistent with other parts of the plan e.g. housing, 2016-2035. On this basis, and using 4.9 hectares the baseline OAN should be 93.1 hectares.**

- Where the Council are of the view that large, strategic sites are needed to support economic growth, which we acknowledge should be given significant weight alongside, other planning policy, such as Green Belt, such sites could be brought forward as **site-specific, selective releases of the Green Belt land to meet these needs. There is no need for a comprehensive Green Belt review to meet these needs.**
- There is no evidence to support need for a further five years of land supply for employment in addition to the baseline. **This figure should be deleted leaving a baseline of 93.1 hectares.**
- There is considerable uncertainty regarding the SM and the figures it produces. Mr Elias deals with this in more detail in his submission. Such uncertainty, it may well be that a new SM method and figure emerges before or during the examination of the St Helens Local Plan, is not a sound basis on which to change Green Belt boundaries. Boundaries that have an essential characteristic of being permanent. The conclusion we draw here is that there is considerable uncertainty about future housing need. This does not provide a firm basis for concluding that “exceptional circumstances” exist for the review of the Green Belt boundary.

Effective

128. It is not possible to assess if cross-boundary issues have been dealt with – no statement(s) of common ground have been produced in supporting evidence.

Positively prepared

129. The plan is not positively prepared. There is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily the plan does not achieve sustainable development.

Duty to cooperate

130. The Submission Draft as set out in section 7 of this statement also fails to meet the duty to cooperate. The Submission Draft’s aspirational economic growth strategy fails to take into account impact on the wider sub-region and region; it

fails to address the potential for West Lancashire to meet some of West Lancashire's unmet housing need; and it fails to plan strategically for Green Belt.

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The Planning People

**A review of St. Helens Local Plan Submission Draft
and update of the St. Helens Strategic Housing
Market Assessment (SHMA)**

Demographic Appraisal

on behalf of the

St Helens Green Belt Association

By Piers Elias

Independent Demographer

10 March, 2019

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1. *Piers Elias - Personal Biography*

- 1.1. Piers Elias has a joint honours degree in Mathematics and Economics (Loughborough, 1981-84) and has over 21 years' experience in Local Government working for the Tees Valley Joint Strategy Unit and then the Tees Valley Local Enterprise Partnership (now Tees Valley Combined Authority) providing demographic insight and projections for school rolls, electors for ward reviews, household, population and labour force projections for Local Plans and the Tees Valley Strategic Economic Strategy.
- 1.2. He currently works as an independent demographer providing advice and guidance on a range of demographic issues including projections and methodology - his website can be viewed [here](#)¹. He has an excellent working knowledge of the POPGROUP software, having been a user since 2006 and worked briefly for Edge Analytics, the current licence holder, in 2015.
- 1.3. During his time in Local Government he sat on Office for National Statistics (ONS) working groups for small area estimates, Local Authority population estimates and Census definitions. He was also the Local Authority lead on the Central and Local Information Partnership (CLIP) Population sub-group for 10 years and is well versed in ONS methodology.
- 1.4. He is a strong supporter of the Census and was the Local Authority representative for the Independent Working Group on the future of the Census² and also represented Local Government at a Public Administration Select Committee (PASC)³ and at a Parliamentary Office Science & Technology (POST) seminar⁴; this lobbying helped in securing funding for a 2021 Census. He sat on the Census Advisory Group as a Local Authority representative for six years.
- 1.5. He is currently President of the British Society for Population Studies and has recently been re-appointed to the CLIP Population sub-group, acting as an independent advisor. He also acts as non academic grants assessor for the Economic and Social Research Council.

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2. *Introduction and Background to the Report*

- 2.1. This report is written on behalf of the St. Helens Green Belt Association (SHGBA). It constitutes a response to the St. Helens Local Plan Submission Draft and the update of the St. Helens Strategic Housing Market Assessments (SHMA) by GL Hearn both released in January, 2019. The report considers the demographic factors that have gone into calculation of housing need with a view to assessing the integrity of the inputs and the plausibility and consistency of the outputs from a demographic viewpoint. Recommendations and an executive summary are given in Chapter 3.
- 2.2. The recent change to calculating the starting point for assessing housing need is now a simple formula exercise. This may be more transparent than the old methodology but it removes the link between trends in migration, households and jobs that ensures a consistency across projections that make the planning process achievable and realistic.
- 2.3. The first part of the report (Chapters 4 to 8) looks at the demographic trends that would normally feed into the Objectively Assessed Housing Need (OAHN) and the

¹ www.demographicssupport.co.uk

² [independent-working-group](http://www.independent-working-group.org)

³ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/public-administration-select-committee/news/future-of-the-census-1/>

⁴ <https://www.parliament.uk/documents/post/The%20future%20of%20the%20Census%2025%20Nov13,%20POST%20flyer.pdf>

recent changes to assessing the starting point for housing need from the Ministry for Housing, Communities and Local Government (MHCLG). It considers how the latest estimates and projections, from both the Office for National Statistics (ONS) and the MHCLG, have impacted on the projections in the SHMA update (published January, 2019) in terms of OAHN. These are currently based on 2016 population projections, with 2017 Mid Year Estimates (MYEs) taken into account, but crucially, using the HRRs from the 2014 based MHCLG Household projections, rather than the more recent 2016 based ONS produced household projections in accordance with new MHCLG guidance.

- 2.4. The second part of the report (Chapters 9 & 10) looks at how the housing completions and the jobs led projections tie in with the housing targets and population change. The jobs led projections were provided by Oxford Economics (OE).
- 2.5. The report will also look at the migration changes up to and including data to Mid 2017 for moves between St. Helens and the rest of the UK (internal migration) as well as moves with the rest of the world (international migration).
- 2.6. There are early signs of changes to international migration patterns as a consequence of the Brexit vote; data released by ONS on Long Term International Migration (LTIM) on 29th Nov 2018 shows a slow-down in net migration of EU nationals offset by an increase in non-EU nationals ⁵.
- 2.7. St. Helens has no university of its own and so the impact of students on migration, both domestic and international, and housing can be discounted.

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<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/internationalmigration/datasets/migrationstatisticsquarterlyreportprovisionallongterminternationalmigrationltimestimates/current/provisionalestimatesoflongterminternationalmigrationyejune2018.xls>

3. Recommendations & Executive Summary (Ch.nn refers to the Chapter & Point)

Recommendations

- 3.1. *St. Helens housing need should be 360 dwellings per annum.*
Ch4.5: Prior to the change in MHCLG housing need assessment calculations, the starting point for St. Helens housing need would have been 360 dwellings per annum; using the latest projections provides an fully objective and nationally consistent starting point.
- 3.2. *St. Helens Council should aim to reduce unemployment rates.*
CH10.13: Reducing unemployment rates is a very sustainable way to improve the local economy without any additional infrastructure and should be a policy considered as part of the planning process. A 1 percentage point reduction in unemployment by 2033 reduces the need for new dwellings by approximately 50 dwellings per annum (dpa).
- 3.3. *St. Helens Council should develop policies to reduce commuting.*
Ch10.12: Having more jobs within St. Helens for St. Helens' residents would reduce the numbers of new dwellings needed, as well as reduce traffic emissions and congestion.
- 3.4. *St Helens Council should aim to reduce vacancy rates.*
Ch4:11 St. Helens Council should aim to reduce vacancies for non long-term vacancies which should be part of local housing policy. It is a sustainable policy, as it uses existing housing and infrastructure, and reduces the need for developing on Greenfield sites.
- 3.5. *To note that annual moves within the UK must sum to ZERO.*
Ch6.8: The pattern of aspirational growth is repeated across England supported by Government policy - the reality is that if one Local Authority gains a resident, it has to be offset by a loss to another. The pool of INTERNAL (UK Residents) migrants is finite and across the UK, the net annual change across all Local Authorities is zero.
- 3.6. *New housing phasing is too ambitious and should be slowed down.*
Ch9.3 to Ch9.5: The phasing of new build is out of kilter with current trends and should be revisited. This is due to capacity issues within the house building industry.
- 3.7. *GL Hearn & Oxford Economics to re-assess their projection models to demonstrate consistency.*
Ch10.8: The inconsistency between jobs led projections produced using one method (Oxford Economics) and demographic projections for population and households using another (Popgroup) should be tested for consistency; the results lacks any demographic logic that should be robustly challenged.

Key Comments

- 3.8. Ch10.11: The National Audit Office (NAO) shares the concerns of 55% of organisations who responded against the decision to use the 2014 Sub-National Household Projections (SNHP) in the recently announced response to the Technical Consultation on updates to Planning Guidance⁶ (See Question 1); A recent report by the NAO "Planning for New Homes" highlights weaknesses in the standard method and the need to revise it. (See Summary Section #8⁷).
- 3.9. Ch5.4: MHCLG should be recommending the use of latest information: The UK Statistics Authority advises the use of the latest information; under the General

⁶

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779792/LHN_Gov_response.pdf

⁷<https://www.nao.org.uk/wp-content/uploads/2019/02/Planning-for-new-homes.pdf>

Principles on guidance for information and official statistics *"When making important decisions, the best available data should be used."*⁸

- 3.10. Ch5.6: MHCLG need to review their use and interpretation of projection data. On understanding projections, Richard Pereira, Deputy Director, ONS Centre for Ageing & Demography says *"Therefore, household projections are not a measure of how many houses would need to be built to meet housing demand; they show what would happen if past trends in actual household formation continue."*(October 2018 ⁹).
- 3.11. Ch5.7 MHCLG will be reviewing the Standard Method and the use of national data over the next 18 months (Para 3, Government Response to the Technical Consultation Question 1 ¹⁰). This creates a period of uncertainty for planning local housing need.

Summary Points

- 3.12. Ch4.9: Whilst MHCLG have just announced their decision to retain the 2014 SNHPs as the starting point for housing need calculations ¹¹, this goes against 55% of organisations stating they were not happy with that decision, and it goes against UK Statistics Authority (UKSA) advice, that advises the use of the "latest" information¹².
- 3.13. Ch4.12: There are no issues surrounding the use of the Fertility and Mortality rates from the SNPPs or the move to using the 2017 MYEs.
- 3.14. Ch6.5: Table 6 shows that internal migration flows in both directions have increased since 2011/12, suggesting improved job opportunities and affordability of housing.
- 3.15. Ch6.6: Local and strategic plans need to be compared - at the very least, at a Regional level - to test for consistency and realistic assumptions on use of UK migrants to satisfy dwelling and economic growth aspirations.
- 3.16. Ch6.7: All Local Authorities are competing for extra residents to fulfil economic growth ambitions and to increase the housing supply - within the UK, migration must balance - migrants cannot be in two (or more) places at once.
- 3.17. Ch7.3: Local Authorities should look to be using SNPPs with a 10 year migration trend. This will help smooth economic cycles and if all planning authorities use the same set of projections then better consistency will be ensured. ONS will be releasing such a scenario in April, 2019.
- 3.18. Ch8.4: International migration has little impact in St. Helens, though the impact of Brexit should be monitored as and when new data is published.
- 3.19. Ch8.12: Overall, numbers of international migrants are small with gross flows in the mid to low hundreds and net flows in the very low hundreds. The administrative data shows some signs of the impact of Brexit, though mainly on a downward pressure side as far as housing need in St. Helens is concerned.

⁸ <https://www.statisticsauthority.gov.uk/wp-content/uploads/2016/06/National-Statisticians-Guidance-Management-Information-and-Official-Statistics.pdf> Section 4.3

⁹ <https://blog.ons.gov.uk/2018/10/19/what-our-household-projections-really-show/>

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779792/LHN_Gov_response.pdf

¹¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779792/LHN_Gov_response.pdf

¹² <https://www.statisticsauthority.gov.uk/wp-content/uploads/2016/06/National-Statisticians-Guidance-Management-Information-and-Official-Statistics.pdf> Section 4.3

- 3.20. Ch8.14: Projection scenarios that assume above-trend growth must take extra migrants **either** from elsewhere in the UK, in which case those migrants should be subtracted from the population from whence they came **or** taking someone else's share of the international migrant pool. One areas gain is another area's loss **unless** allowance is made for the net flow of international migrants to increase.
- 3.21. Ch9.2: It is clear that MHCLG will have to reconsider how the ONS household projections are interpreted and used when assessing housing need and how to make best use of the new projections; as it stands there is no connection between the new method and current ONS projections.
- 3.22. Ch9.4: There is an issue over a) house building industry capacity and skills shortages¹³ and b) whatever capacity there may be for growth in the building sector, having simultaneous above-trend growth across the whole of the UK will require a further increase in capacity - are there the skills and manpower available for such nationwide increases?
- 3.23. Ch10.3 & 10.7: The numbers of dwellings (and population) arising from the extra 7,797 jobs would be well above what is projected. This is due to the age structure of St. Helens where the 75+ age group accounts for 71% of the increase. There is a clear disjoint in the relationship between jobs, dwellings and population.
- 3.24. Ch10.9 The methodology for the OE population projections should to be assessed and tested against other recognised software to ensure consistency between jobs, population and dwellings.

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4. **Base data & Projections used**

- 4.1. **Population:** The St. Helens Local Plan Submission Draft and GL Hearne SHMA update uses the 2016 based sub-national population projections from ONS (SNPPs)¹⁴ which, under normal circumstances would be used to feed into ONS 2016 based Sub-National Household Projections (SNHPs)¹⁵. However, as the numbers of households from the 2016 based ONS SNHPs produced figures below Government targets, an interim approach has been recommended by MHCLG to use the MHCLG 2014 Sub-National Household Projections (SNHPs)¹⁶.
- 4.2. GL Hearn have used the more recent ONS Mid Year Estimates for 2017 (Published in June 2018¹⁷) to roll forwards the starting point of the projections. The impact is a small upward effect on the projections which result from a) slightly higher net inward internal migration (from within the UK) b) very slightly higher net inward international migration off set by c) slightly lower natural change (births minus deaths). Overall this change adds around 300 to the population by 2033. Table 1 shows the base figures, the original ONS SNPPs and the revised projection using the 2017 MYE as the base (Note, this is an estimate based on the increase of dwellings per annum of 7 from Table 3, Section 3.7¹⁸).

¹³ <https://www.constructionglobal.com/mission-critical/skills-shortage-uk-construction-industry>

¹⁴ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2016based>

¹⁵ <https://www.ons.gov.uk/releases/2016basedhouseholdprojectionsinengland>

¹⁶ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections#based-live-tables>

¹⁷ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2017>

¹⁸ https://www.sthelens.gov.uk/media/9436/st-helens-shma-update-report-v33_final.pdf

Table 1 : 2014, 2016 & 2017 Based Population Estimates & Projections for St. Helens.

Local Authority	Base	Source	Mid 2014	Mid 2015	Mid 2016	Mid 2017	...	Mid 2033	Change 2016-2033	Annual Change Mid 2016-33
St. Helens	2014 Based	ONS SNPPs	177,190	177,650	178,230	178,820	...	186,680	8,450	500
St. Helens	2016 Based	ONS SNPPs	177,190	177,590	178,480	178,960	...	185,240	6,760	400
St. Helens	2016 Based/2017 MYEs	Rolled forwards ONS SNPPs	177,190	177,590	178,480	179,330	...	185,520	7,040	410

Source: ONS 2014 & 2016 based SNPPs © Crown Copyright. Note: Figures are rounded to nearest 10. The highlighted figure for 2033 on the third row has been estimated to tie in with GL Hearne Table 3 in Section 3.7¹⁹.

4.3. The more recent set of population projections, the 2016 based SNPPs are some 100 people lower per annum than the 2014 SNPPs, which reflects the slower rate of growth in the 2016 National Population Projections (NNPs)²⁰ on which the SNPPs are based: At the UK level, international migration is projected to be lower, births are lower and deaths are higher at 2033.

4.4. **Households:** MHCLG 2014 and ONS 2016 Based sub-national household projections (SNHPs) and calculations based on the ONS 2017 Based MYEs, are shown in Table 2 below.

Table 2 : 2014, 2016 & 2017 Based Household Estimates & Projections for St. Helens.

Local Authority	Base	Source	Mid 2014	Mid 2015	Mid 2016	Mid 2017	...	Mid 2033	Hhlds Change 2016-2033	HHlds Per Annum Mid 2016-33	Dwellings Per Annum 2016-33
St. Helens	2014 Based	MHCLG SNHPs	77,170	77,600	78,160	78,700	...	85,280	7,120	420	430
St. Helens	2016 Based	ONS SNHPs	76,880	77,330	77,930	78,440	...	83,740	5,810	340	350
St. Helens	2016 Based/2017 MYEs	Revised ONS SNHPs	76,880	77,330	77,930	78,450	...	83,860	5,920	350	360

Source: MHCLG 2014 based SNHPs & ONS 2016 Based SNHPs © Crown Copyright. Figures are rounded to nearest 10. The highlighted figure for 2033 on the third row has been estimated to reflect the impact of using 2017 MYEs, in line with GL Hearne Table 3 in Section 3.7²¹.

4.5. The ONS 2016 based SNHPs result in significantly lower numbers of projected households, by around 80 households per annum, or 20% lower, compared to the MHCLG 2014 based SNHPs. Prior to the change in MHCLG housing need assessment calculations, the starting point for St. Helens would have been, and should really be, 360 dwellings per annum. Using the latest projections provide an objective and nationally consistent starting point.

4.6. The two main reasons for this are both to do with changes in methodology for the sub-national household projections with ONS using:
 i) a shorter time series for Household Representative Rates (HRRs) 2001 & 2011 Censuses only rather than going back to 1971 and
 ii) Fixing HRRs at the 2021 rates from 2022 onwards²². i.e. no further changes to household formation are made.

4.7. The change due to rolling forwards to the 2017 MYEs is small and adds seven households (and dwellings) per annum to the projections (See GL Hearn SHMA Update, Table 3).

¹⁹ https://www.sthelens.gov.uk/media/9436/st-helens-shma-update-report-v33_final.pdf

²⁰ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/tablea11principaleprojectionsummary>

²¹ https://www.sthelens.gov.uk/media/9436/st-helens-shma-update-report-v33_final.pdf

²² <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/methodologyusedtoproducehouseholdprojectionsforengland2016based>

4.8. When the 2014 HRRs are combined with the 2016 SNPPs, the full effect of the change in MHCLG housing need methodology can be seen. Below is Table 3 from the updated SHMA by GL Hearn (See Section 3.7)²³.

Table 3: Revised 2016 & 2017 Based Household Projections (with 2014 HRRs) for St. Helens.

Local Authority	Base		Mid 2016	...	Mid 2033	Change 2016-2033	Annual Household Change	Annual Dwelling Change
St. Helens	2016 Based	GL Hearne Demographic Modelling	78,254	...	84,696	6,442	379	391
St. Helens	2016 Based & 2017 MYE	GL Hearne Demographic Modelling	78,254	...	84,812	6,558	386	398

Source: GL Hearne Demographic Modelling, SHMA Update Table 3 in Section 3.7²⁴.

- 4.9. By using the HRRs from the 2014 Based SNHPs, in conjunction with the 2016 SNPPs, the annual dwelling change moves up to 391 dpa, excluding 2017 MYEs, and 398 dpa including 2017 MYEs. This is around 50 dpa higher than seen in Table 2 above. Whilst MHCLG have just announced their decision to retain the 2014 SNHPs as the starting point for housing need²⁵ calculations, this goes against 55% of organisations stating they were not happy with that decision, and it goes against UK Statistics Authority (UKSA) advice, that advises the use of the "latest" information²⁶.
- 4.10. **Vacancy:** Numbers of households are converted to dwellings using the vacancy rates (Dwellings= Households/(1-Vacancy Rate) which are derived from the MHCLG Tables 125 (Dwellings) and Tables 615 (Vacant)²⁷, which in turn are based on Council Tax returns. Figures show St. Helens had a vacancy rate of 3.2% in 2012 and by 2017, it had fallen to 3.0%. For the projection period, an assumption of 3.0% has been used.
- 4.11. St. Helens has a very low percentage of long term vacant at around 1%, which it has managed to reduce over the last few year. However, there ought to be a policy desire to reduce the non long-term vacancies rather than accepting that there is nothing the Council can do to reduce this (See 4.18.17 in the Local Plan Submission Draft²⁸). St. Helens Council should aim to reduce vacancies for non long-term vacancies which should be part of local housing policy. It is a sustainable policy, as it uses existing housing and infrastructure, and reduces the need for developing on Greenfield sites.
- 4.12. Projections for births and deaths at Local Authority level follow the long term trends from the National Population Projections, but are adjusted to reflect the differentials in age and sex fertility and mortality rates within each Local Authority. This is replicated in the POPGROUP models where birth and death rates react to changes in the overall population age and sex structure that result from whatever migration assumptions are used. There are no issues surrounding the use of the Fertility and Mortality rates from the SNPPs or the move to using the 2017 MYEs.

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²³ https://www.sthelens.gov.uk/media/9436/st-helens-shma-update-report-v33_final.pdf

²⁴ https://www.sthelens.gov.uk/media/9436/st-helens-shma-update-report-v33_final.pdf

²⁵

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779792/LHN_Gov_response.pdf

²⁶ <https://www.statisticsauthority.gov.uk/wp-content/uploads/2016/06/National-Statisticians-Guidance-Management-Information-and-Official-Statistics.pdf> Section 4.3

²⁷ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

²⁸ <https://www.sthelens.gov.uk/media/9525/local-plan-written-plan-web.pdf>

5. *The new Standard Method for Assessing Housing Need*

5.1. A new methodology was introduced by MHCLG in July 2018 which aimed to provide a minimum starting point for assessing housing need. For each 1% increase in the ratio of (median) house prices to (workplace) earnings, where the ratio is above 4 (the standard multiple used by most mortgage lenders), the average household growth should be increased by a quarter of a percent. No adjustment is applied where the ratio is 4 or below. Where an adjustment is to be made, the precise formula is as follows:

Adjustment Factor = $1/4 * [(Local\ Affordability - 4) / 4]$ to be applied to the average household change over a 10 year period. See 5.7, Table 4 for the figures that are produced.

5.2. The new method originally advised using "the most recent projections, calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive years, with the current year being the first year)." Paragraph: 004 Reference ID: 2a-004-20180913

5.3. However, in November 2018, this changed following the release of a technical consultation (held between Friday 26 October 2018 Friday 7 December 2018²⁹), the results of which have just been published³⁰. This advised using the 2014 Based Household projections, rather than the 2016 based household projections which contradicts MHCLG's own Planning Guidance recommendations from July 2018. This contradiction remains. The reason for this decision is that the 2014 SNHPs give a number closer to the Government's overall housing target.

5.4. This decision undermines advice from the UK Statistics Authority (UKSA), the body responsible for assessing the validity of National Statistics. The UKSA advises the use of the latest information; under the General Principles on guidance for information and official statistics from the UKSA, the body governing ONS, the section labelled "Maximum value", 4.3 states... "*When making important decisions, the best available data should be used.*"³¹. The MHCLG decision to use 2014 based data is fundamentally flawed with the National Audit Office concerned that the Government department is failing to deliver³².

5.5. It should also be noted that the MHCLG and the ONS SNHPs are not designed to assess housing need at a Local Authority level, rather, they form a statistically consistent starting point for all Local Authorities to demonstrate what would happen if current trends continued (note: the sub-national population projections are controlled to the national population projections, which are completed as a separate exercise, to ensure consistency³³).

5.6. ONS have also published a blog, which was included in the Consultation document, explaining what the new Household projections actually mean... "*Household projections are based on trends in actual numbers of households. They do not take account of how many people may want to form new households, but for whatever*

²⁹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/751810/LHN_Consultation.pdf

³⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779792/LHN_Gov_response.pdf

³¹

<https://www.statisticsauthority.gov.uk/wp-content/uploads/2016/06/National-Statisticians-Guidance-Management-Information-and-Official-Statistics.pdf> Section 4.3

³²

<https://www.nao.org.uk/press-release/planning-for-new-homes/>

³³

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2016basedstatisticalbulletin>

reason aren't able to, such as young adults wanting to move out of their parents' house, or people wanting to live on their own instead of in a house share. Therefore, household projections are not a measure of how many houses would need to be built to meet housing demand; they show what would happen if past trends in actual household formation continue." Richard Pereira, Deputy Director, ONS Centre for Ageing and Demography (October 2018) ³⁴.

5.7. MHCLG will be reviewing the Standard Method and the use of national data over the next 18 months (Para 3, Government Response to the Technical Consultation Question 1 ³⁵). This creates a period of uncertainty for planning local housing need.

5.8. Table 4 below shows the results of using the 2014 and the 2016 based projections for the calculation of the starting point for housing need.

Table 4: Comparison of MHCLG Standard Methods:

MYE	SNPP Base	SNHP Base	Average 2019-29 Households Per Annum	Ratio House Prices to Earnings	Adjustment Required	Adjusted Households Per Annum	Dwellings Per Annum
2014	2014	2014	425	5.59	9.94%	467	482
2016	2016	2016	332	5.59	9.94%	365	376

Source: ONS, MHCLG projections. ONS House Prices to Earnings³⁶

5.9. The dwellings per annum figure from the 2014 base gives 482 and matches the figure quoted in Section 2.14 of the updated SHMA³⁷.
(Note that Table 2 in the same section shows household figures for 2018 and 2028, though they are labelled 2016 and 2016, and ought to relate to 2019 and 2029).

5.10. The figure generated from the more recent 2016 based projections, 376, is more in line with what should be used on the basis of using best information; trends change and those more recent trends should be acknowledged, not ignored.

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6. Internal Moves - Migration within the UK - St. Helens

6.1. The next two sections look at migration within the UK (internal migration) while Section 8 looks at international migration. This is intended to identify any changes in trends and also highlights areas of potential conflict when several areas are looking at increasing population above the trend based projections at the same time. ONS publish detailed estimates for internal moves (annually from 2011) and data are available by Single Year of Age and Sex for all Local Authorities in the UK.

6.2. Moves to and from St. Helens, within the UK are shown in Table 4 (2011-12) and Table 5 (2016-17) and these compare how the top ten moves INTO and OUT of St. Helens have changed and look at where the main flows lie.

³⁴ <https://blog.ons.gov.uk/2018/10/19/what-our-household-projections-really-show/>

³⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779792/LHN_Gov_response.pdf

³⁶ <https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian/current/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian.xls>

³⁷ https://www.sthelens.gov.uk/media/9436/st-helens-shma-update-report-v33_final.pdf

Table 5 : Top Ten flows INTO (and OUT of) St. Helens 2011-12.

LA_Code	LA_Name	HMA_Area	Moves INTO	% of Total	MOVES OUT	% of Total	Net Flows
Grand Total	St. Helens (Total)	Central HMA	4920		4700		220
E08000011	Knowsley	Central HMA	636	13%	450	10%	186
E08000012	Liverpool	Central HMA	603	12%	423	9%	180
E08000010	Wigan	Outside_HMA	588	12%	581	12%	7
E06000007	Warrington	Mid Mersey HMA	397	8%	496	11%	-99
E06000006	Halton	Mid Mersey HMA	231	5%	177	4%	53
E08000003	Manchester	Outside_HMA	161	3%	140	3%	20
E08000014	Sefton	Central HMA	159	3%	151	3%	8
E07000127	West Lancashire	Mid Mersey HMA	158	3%	130	3%	28
E08000015	Wirral	Central HMA	93	2%	70	1%	24
E06000049	Cheshire East	Outside_HMA	76	2%	48	1%	28

Source: ONS Detailed Migration, Local Authority Moves, 2011-12, (c) Crown Copyright. HMA = Housing Market Area as identified in the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA)

6.3. Table 5 shows that Knowsley, Liverpool and Wigan are the main Local Authorities that exchange migration, accounting for around 1 in 3 IN flows and OUT flows. Warrington and Halton, both coterminous with St. Helens account for 1 in 7 IN flows and OUT flows. In net terms, most areas cancel each other out with very little net change but with Knowsley and Liverpool being the two main areas of net IN flow, and Warrington the largest net OUT flow.

6.4. Table 6 looks at the same flows but for moves between mid 2016 and mid 2017, i.e. as used in the 2017 MYEs.

Table 6: Top Ten flows INTO (and OUT of) St. Helens 2016-17

LA_Code	LA_Name	HMA_Area	Moves INTO	% of Total	MOVES OUT	% of Total	Net Flows
E08000013	St. Helens (Total)	Central HMA	6412		5745		667
E08000010	Wigan	Outside_HMA	877	14%	933	16%	-56
E08000011	Knowsley	Central HMA	835	13%	553	10%	281
E06000007	Warrington	Mid Mersey HMA	690	11%	556	10%	134
E08000012	Liverpool	Central HMA	634	10%	476	8%	158
E06000006	Halton	Mid Mersey HMA	253	4%	234	4%	18
E07000127	West Lancashire	Mid Mersey HMA	222	3%	273	5%	-50
E08000014	Sefton	Central HMA	184	3%	200	3%	-16
E08000003	Manchester	Outside_HMA	181	3%	176	3%	5
E08000006	Salford	Outside_HMA	136	2%	88	2%	47
E08000015	Wirral	Central HMA	104	2%	78	1%	26

Source: ONS Detailed Migration, Local Authority Moves, 2016-17, (c) Crown Copyright.

6.5. Table 6 shows Wigan has moved to the top and Warrington has moved above Liverpool in terms of gross inflows. The same top 5 account for around 50% of all IN and OUT moves between Mid 2016 and Mid 2017. Knowsley accounts for over one third of net IN migration. Overall, net UK migration for St. Helens is now more positive at +670. Table 6 shows that internal migration flows in both directions have increased since 2011/12, suggesting improved job opportunities and affordability of housing.

6.6. For St. Helens to grow its population using internal migration, it is going to have to attract more population from the Liverpool City Region area and then from Greater Manchester - however, the Greater Manchester Strategic Framework (second draft pending) is also looking to grow and will need to top-up its population with migrants from these same areas i.e. Liverpool, Cheshire & Lancashire - there is a danger that these migrants are being used twice.

Local and strategic plans need to be compared - at the very least, at a Regional level - to test for consistency and realistic assumptions on use of UK migrants to satisfy dwelling and economic growth aspirations.

- 6.7. In terms of adjoining Local Authorities and what their latest plans are for Housing:
- 6.7.1. Halton³⁸ needs to grow at nearly double the MHCLG Standard Formula rate (446 dpa [2016 Mid Mersey SHMA] vs. 241).
 - 6.7.2. Knowsley has an OAHN of 450 (2016-2031³⁹) vs. the MHCLG Standard Formula rate of 234 - almost double.
 - 6.7.3. West Lancashire are aiming for an OAHN of 240 dpa against a figure of 140 dpa from the MHCLG formula 240; 70% higher (West Lancashire Local Plan Review of the Housing and Economic Development Needs Assessment (HEDNA)⁴⁰).
 - 6.7.4. Wigan are aiming for 1,000 dpa (2013 Inspector's Report, Section 11 & 31 based the Core Strategy⁴¹) this is 40% above the MHCLG Standard Formula rate of 714.
 - 6.7.5. Warrington⁴² needs to grow at 30% above the MHCLG Standard Formula rate (995 dpa [2016 Mid Mersey SHMA] vs. 720).
All Local Authorities are competing for extra residents to fulfil economic growth ambitions and to increase the housing supply - within the UK, migration must balance - migrants cannot be in two (or more) places at once.
- 6.8. The two neighbouring large conurbations of Liverpool and Greater Manchester are also looking to grow through increases in employment, planning to build large numbers of new houses. They also rely on new workers living in these same areas which are themselves competing for new workers and new residents.
This pattern is repeated across England supported by Government policy for aspirational growth - the reality is that if one Local Authority gains a resident, it has to be offset by a loss to another. The pool of INTERNAL (UK Residents) migrants is finite and across the UK, the net annual change across all Local Authorities is zero.

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7. Internal Moves - Migration within the UK - General Analysis

- 7.1. At the UK level, population changes occur through ageing, natural change (births minus deaths) and international migration (net flows). Internal moves within the UK are a zero sum result - one Local Authority's gain is another Local Authority's loss.
- 7.2. The National (UK) Population Projections (NPPs) are produced by ONS in collaboration with the devolved Statistical Agencies of National Records Scotland (NRS), StatsWales and the Northern Ireland Statistical Research Agency (NISRA). Projections for each constituent country (2014 based here⁴³ and 2016 based here⁴⁴), along with a set of variant projections (high and low fertility, high and low life expectancy, high and low migration, zero net migration) are also produced and are used by several government departments such as Education (School Roll Planning), Home Office (immigration Policy), HMRC (Tax revenues), DWP (Pensions forecasts), MHCLG for Household Projections - each has its own requirements and each looks at differing time scales.

³⁸ <https://www3.halton.gov.uk/Pages/planning/policyguidance/pdf/OANSHMA.pdf>

³⁹ <https://www.knowsley.gov.uk/knowsleycouncil/media/Documents/Knowsley-SHLAA-Report-2016-Update-Final-Report-Draft-work-app.pdf>

⁴⁰ https://www.westlancs.gov.uk/media/503879/HEDNA_WestLancashire_Mar2017.pdf

⁴¹ <https://www.wigan.gov.uk/Docs/PDF/Council/Strategies-Plans-and-Policies/Planning/Current-local-plans/Inspectors-Report-15-08-2013.pdf>

⁴² https://www.warrington.gov.uk/download/downloads/id/13446/shma_update_final_report_may_2017.pdf

⁴³

<http://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2015-10-29/relateddata>

⁴⁴

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2016basedstatisticalbulletin>

- 7.3. Currently, in England, ONS take the Principal Population Projection and use it to publish sub-national population projections with the sum of all the components of change at the Local Authority level controlled to the national figure. No variant population projections for migration are yet produced but ONS have recently announced they will be a ten year migration trend variant as well as high and low migration variants. These are due out on 9th April, 2019⁴⁵. Having a 10 year trend would help iron out economic cycles and make the projections more suitable for longer term planning.
Local Authorities should look to be using SNPPs with a 10 year migration trend. This will help smooth economic cycles and if all planning authorities use the same set of projections then better consistency will be ensured.
- 7.4. Having a nationally produced set to balance internal migration would resolve the consistency issue; Local Authorities could still grow their population above the "official" trend base, but only through policies that grow international migration or by agreeing trade-offs of migrants, perhaps within a regional context.
- 7.5. As it stands, the POPGROUP software models each Local Authority independently and each Local Authority, can, in turn, take migrants without limit and without a balancing reduction from the pool that the migrants have come from. There is no attempt to remove extra migrants gained in one area from the areas they have come from with the effect that:-
1). UK internal migration will not sum to zero, as it should and
2). International migration numbers will need to be higher than in the UK projections, if all areas are attempting to grow at a rate above the ONS SNPPs.
- 7.6. Consider the UK as a whole; the POPGROUP software would allow you to increase flows of internal in-migration for all Local Authorities at the same time - there is no constraint on the overall total, which in reality, should sum to zero in net terms. This is why it is important that ONS and the other devolved statistical agencies publish variant projections that are controlled correctly and provide a balanced set of internal (and international) migration and that the same set is used as the starting point.
- 7.7. As the process currently stands, the duty to cooperate with neighbouring Local Authorities would have to be extended so that there is agreement that not all Local Authorities can gain at the same time. Simultaneous above-trend growth can only really occur if net international migration is increased, and that is certainly NOT a Government Policy at the moment. On Planning, the Government Policy is aimed at driving growth through Strategic Plans while Local Plans are being challenged for not being ambitious enough - but the sum of the parts is greater than what is mathematically possible. This issue needs to be seriously considered.

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8. International Migration - Moves to and from Outside the UK

- 8.1. ONS measure the movements of international migrants using the International Passenger Survey (IPS) which is principally used for Balance of Payments calculations. It has long been recognised as the weakest part of the population estimation process, particularly at Local Authority level as the sample size of long-term migrants (those coming to stay (or leaving the UK) for a period of more than one year, and therefore classed as a resident, is very small - in 2017, approximately 2,000 for in-migrants and 1,100 for out-migrants⁴⁶ for the whole of the UK.

⁴⁵ <https://www.ons.gov.uk/releases/subnationalvariantpopulationprojectionsforengland2016based>

⁴⁶ <https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/internationalmigration/datasets/internationalpassengersurveymarginsoferrortable102/current/1.02ipsmarginsoferror1975to2017.xls>

8.2. These numbers are scaled up to the totals that make up the flows that appear in the Long Term International Migrations (LTIM) Statistics that are released on a rolling quarterly basis. Figures for the year to Mid 2017 for the UK were estimated to be 625,000 in-migrants and 351,000 out-migrants⁴⁷.

8.3. International flows for St. Helens are shown in Tables 7 below.

Table 7 - Inward migration from outside the UK into St. Helens - 2001/02 to 2016/17

International Migration Flows	IN flows	OUT flows	Net Flows	Rolling 6 Year Average
Year to Mid 2002	117	186	-69	
Year to Mid 2003	166	161	5	
Year to Mid 2004	177	251	-74	
Year to Mid 2005	329	517	-188	
Year to Mid 2006	566	537	29	
Year to Mid 2007	476	487	-11	-51
Year to Mid 2008	572	412	160	-13
Year to Mid 2009	448	365	83	0
Year to Mid 2010	416	288	128	34
Year to Mid 2011	383	270	113	84
Year to Mid 2012	250	210	40	86
Year to Mid 2013	256	243	13	90
Year to Mid 2014	317	263	54	72
Year to Mid 2015	341	240	101	75
Year to Mid 2016	434	237	197	86
Year to Mid 2017	416	339	77	80

Source: ONS 2017 MYE Components of Change © Crown Copyright.

8.4. From Table 7 above - international migration inflows have been small in both gross flows and net flows, adding fewer than 100 residents to St. Helens each year. Flows were lower following the economic downturn of 2008/09 than in the years just after the EU Accession countries (A8) gained freedom of movement in 2004 but then picked slightly from a low point in 2011/12. The impact of Brexit vote is still uncertain, and yet to be reflected in Mid Year Estimate figures.

International migration has little impact in St. Helens, though the impact of Brexit should be monitored as and when new data is published.

8.5. ONS revised its methodology to improve the allocation of international migrants across Local Authorities and now uses statistics from a range of administrative sources including National Insurance Allocations, GP registrations, student data from the Higher Education Statistical Agency (HESA)⁴⁸.

⁴⁷

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/internationalmigration/datasets/migrationstatisticsquarterlyreportprovisionallongterminternationalmigrationltimestimates/current/provisionalestimatesoflongterminternationalmigrationyejune2018.xls> (See Table 1).

⁴⁸ <http://www.ons.gov.uk/ons/guide-method/method-quality/imps/improvements-to-local-authority-immigration-estimates/overview-of-improved-methodology.pdf>

8.6. Some of these data are available on the ONS Local Authority Migration Indicator (LAMI) Tool⁴⁹ and recent trends are shown in Table 8 below.

Table 8 - International Migration Indicators for St. Helens, 2008 to 2017

Year	NINO	GP Registrations	% Births to Non-UK Born Mothers	Short Term International Migrants
2008	374	339	5.1	154
2009	283	306	5.3	123
2010	253	266	4.3	101
2011	317	262	5.4	55
2012	292	313	5.0	36
2013	320	326	5.3	46
2014	385	370	5.8	53
2015	468	345	6.4	58
2016	488	393	6.2	77
2017	408	577	7.4	NYA
2018	313	NYA	NYA	NYA
Sources	A	B	C	D

All available on ONS Local Area Migration Indicators Spreadsheet, ONS⁵⁰ NYA - Not Yet Available

Source A: ONS, NISRA, National Insurance Number allocations - Department for Work and Pensions (DWP)s.

Source B: ONS, NISRA, Patient Register Data Service (PRDS)

Source C: ONS, NISRA, National Insurance Number allocations - Department for Work and Pensions (DWP)s.

Source D: International Passenger Survey (IPS), ONS and administrative data sources

8.7. **NINO:** Column A: Numbers of National Insurance Number (NINO) Allocations fell following the banking crisis of 2007/08. Figures from 2012 onwards saw steady increases until the Brexit vote (May 2017). Since then numbers have fallen and are now nearer 300 suggesting a decline in job opportunities or a decline in the attractiveness of the UK as a working destination for EU migrants. However, information on net change is not available as there is no requirement to de-register when leaving the country.

8.8. **GP Registrations:** Column B. Numbers of non-UK nationals who register with a GP have been averaging at around 300 per annum. Most recent figures for 2016 and 2017 have seen an increase, particularly for 2017, with 577 registrations. This may be to do with Brexit with non-UK nationals registering in case of changes to reciprocal agreements on health care. Prior to 2017, GP registrations were around the same level as the Inflows from the MYEs (300-400), though the MYEs apply only to Residents i.e. those staying in the UK for over a year whereas eligibility for GP Registration is based on an intention to stay at least 6 months. As with NINO allocations, net change is not available as there is no requirement to de-register when leaving the country. GP Registrations cover all ages and will include some non-residents (MYE definition).

8.9. **Births to Overseas Mothers:** Column C - Mothers born overseas have a higher number of children than their UK born counterparts. The estimated total fertility rate (TFR) for UK born women fell to 1.71 children per woman in 2017; for non-UK born women

⁴⁹

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets/localareamigrationindicatorsunitedkingdom/current/publicviewmastercopylocalareamigrationindicatoraugust2018.xlsx>

⁵⁰

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets/localareamigrationindicatorsunitedkingdom/current/publicviewmastercopylocalareamigrationindicatoraugust2018.xlsx>

the estimated TFR decreased to 1.95 compared with 2.10 in 2014⁵¹. However, births have little impact on the numbers of dwellings needed over the next 20 years but may affect the type of houses needed in terms of size.

Trends currently show that TFRs for non-UK born mothers are slowly converging. In 2012, the figure was 2.3 vs. 1.9 and in 2004, 2.5 vs. 1.7. Latest figures for 2017 show that convergence continuing 1.95 for non-UK born women vs. 1.71 for UK born women.

8.10. Short Term Migrants: Column D - Numbers come from the International Passenger Survey (IPS) and cover those staying in the UK for between 3 and 12 months. Numbers are extremely small, at around 0.04% of the resident population, one tenth of the national average for England (0.36%).

These migrants are not accounted for either in the MYEs or the SNPPs as they are not classified as residents. However, they do need accommodation and will add to the demand for housing, though these numbers can include students and so may be absorbed into communal student accommodation. In St. Helen's case, the numbers are insignificant.

8.11. Students - there are no Universities within the St. Helens Local Authority area.

8.12. Overall, numbers of international migrants are small with gross flows in the mid to low hundreds and net flows in the very low hundreds. The administrative data shows some signs of the impact of Brexit, though mainly on a downward pressure side as far as housing need in St. Helens is concerned.

8.13. At a national level, ONS fixes the numbers of international migrants from 2023⁵² for the remainder of its projections period for the UK (in the case of the 2016 based National Population Projections, this is up to 2116) and for each Local Authority (2016 based SNPPs up to 2041). The proportion of the UK total for Local Authorities remains the same from 2023. This broad assumption highlights the uncertainty of international migration at a local level and so will need regular monitoring.

UK Migration with the rest of the world is projected to decrease significantly by 2023, from 246,000 in 2016/17 to 165,000 for 2023 onwards.

8.14. In the same way that UK internal migration must sum to zero, the pool of international migrants is finite, unless the Government is prepared to accept higher net flows to satisfy growth.

Projection scenarios that assume above-trend growth must take extra migrants **either** from elsewhere in the UK, in which case those migrants should be subtracted from the population from whence they came **or** taking someone else's share of the international migrant pool. One area's gain is another area's loss **unless** allowance is made for the net flow of international migrants to increase.

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⁵¹

<http://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/parentscountryofbirthenglandandwales/2017>

⁵² <https://www.ons.gov.uk/releases/nationalpopulationprojections2016basedstatisticalbulletin>

9. Housing Completions

9.1. Housing completions give a good indication of what the capacity for house building is within an area. Figures for St. Helens are shown in Table 9 and are based on MHCLG Live Tables on net completions (Table 120⁵³).

Table 9 - Dwellings & Net Completions

Year to March	Dwelling Stock	Annual Net Change	Rolling 5 year Average	MHCLG Standard Formula DPA	Employment Scenario 2 Option 3 DPA	Notes
2001	75,420					Census Based
2002	75,860	440				
2003	76,060	200				
2004	76,790	730				
2005	77,400	610				
2006	77,840	440	484			
2007	78,350	510	498			
2008	78,700	350	528			
2009	78,850	150	412			
2010	79,160	310	352			
2011	79,230	70	278			Census Based
2012	79,650	420	260			
2013	79,920	270	244			
2014	80,470	550	324			
2015	81,100	630	388			
2016	81,670	570	488			
2017	82,160	490	502			
2018	82,570	410	530	482	486	

Source: Dwelling Stock: Census 2001, Census 2011, Housing Flows Reconciliation, the Greater London Authority and Regional Assembly joint returns. Table 125 & GL Hearne SHMA Update⁵⁴.

9.2. Average net completions for the 5 years to 2018 (Rolling 5 year average column) were 530 dwellings, with a high of 630 in 2013 and low of 70 in 2011. This is higher than the housing need from the updated SHMA of 482 (MHCLG formula using 2014 HRRs) and the 486 dpa for Economic Scenario 2 Option 3. The 2016 based ONS projections give an annual growth (2020-2035) of 310 dpa, well below recent completion levels and nowhere near MHCLG calculations.

It is clear that MHCLG will have to reconsider how the ONS household projections are interpreted and used when assessing housing need and how to make best use of the new projections; as it stands there is no connection between the new method and current ONS projections.

9.3. Table 4.7 in section 4.18.19 of the Local Plan Update⁵⁵ shows a housing trajectory with plans for 784 in 2025/26. This level of net building is well above (over 50% higher) the annual five year average of even 530 dpa and in light of the next two points, may be difficult to achieve.

The phasing of new build is out of kilter with current trends and should be revisited.

9.4. There is an issue over a) house building industry capacity and skills shortages⁵⁶ & ⁵⁷ and b) whatever capacity there may be for growth in the building sector, having

⁵³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756093/Live_Table_120.xls

⁵⁴ https://www.sthelens.gov.uk/media/9436/st-helens-shma-update-report-v33_final.pdf

⁵⁵ <https://www.sthelens.gov.uk/media/9525/local-plan-written-plan-web.pdf>

⁵⁶ <https://www.constructionglobal.com/mission-critical/skills-shortage-uk-construction-industry>

simultaneous above-trend growth across the whole of the UK will require a further increase in capacity - are there the skills and manpower available for such nationwide increases?

- 9.5. The Government Inquiry in 2017 into the " Capacity in the homebuilding industry"⁵⁸ concludes as follows:
- 9.5.1. Large developers had no incentive to increase supply that will impact on profits, and control too large a share of the market.
 - 9.5.2. More help for smaller developers and release of smaller sites would help improve competition.
 - 9.5.3. There are concerns over social renting
 - 9.5.4. Proposed a standard approach to assessing housing need (Technical consultation currently under way)⁵⁹
 - 9.5.5. Proposed that a new method for assessing affordability should be introduced (now included in the proposed formula for assessing housing need).
 - 9.5.6. Green Belt should only be used in exceptional circumstances (Para 105) though better guidance for Local Authorities is needed.

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10. Jobs Led Projections

- 10.1. GL Hearn used Oxford Economics forecasts to produce a variety of employment projections with St. Helens Council taking Scenario 2 - Option 3 to be the most realistic (4.18.8⁶⁰ - see footnote, same page). This scenario is for 7,800 jobs and results in 486 dpa (Updated SHMA⁶¹, Section 4.19 Table 10).
- 10.2. The SNPPs contain within them, continuations of trends not only of population, but also derived numbers of households, using Household Representative Rates (HRRs) and jobs which are derived using economic activity, unemployment and commuting rates. If economic activity rates, commuting rates and unemployment rates are all held constant, the impact of the changing age structure in terms of jobs can be seen.
- 10.3. From the 2016 based SNPPs there is in fact a small decline in the numbers of jobs which is result of the 16-74 population also falling very slightly, though with significant shifts in the different age groups: 16-29 down 1,600; 30-44 up 1,400; 45-54 down 3,200 55-68 up 1,400; 69-74 up 1,700. At the same time, the population growth as a whole is 6,800 or 400 people pa with the 75+ age group alone increasing by 7,200 or 420 people pa. The 0 to 15 age group decreases by 15 people pa and the 16 to 74 age group by 10 people per annum. (Note: All figures relate to the period 2016-2033 and may not sum due to rounding).
[This is based on taking the 2016 SNPPs and making the following assumptions:-
 1. Assumes Proportion of the 16-74 Population Economically Active stays at 2011 Census levels of 67%.
 2. Assumes Unemployment rates stay at 7.1% Source: LCR SHELMA section 4.54⁶²
 3. Commuting rates stay as they are (net outflow of 21% - Source 2011 Census. In 2011, there was a shortfall of 13,600 jobs for St. Helens residents.)
- 10.4. On the dwellings side, from the 2016 SNHPs (ONS), there is an overall change of 350 dpa. Almost all of the increase (97%) is in the 75+ age group (343 dpa). Using the 2014 based SNHPs (MHCLG) the set that is recommended for use, there is an overall change of 432 dpa with the 75+ age group accounting for 85% of this increase (367 dpa).

⁵⁷ <https://www.fmb.org.uk/about-the-fmb/newsroom/skills-shortage-will-hamper-housing-delivery/>

⁵⁸ <https://publications.parliament.uk/pa/cm201617/cmselect/cmcomloc/46/46.pdf>

⁵⁹ <https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need>

⁶⁰ <https://www.sthelens.gov.uk/media/9525/local-plan-written-plan-web.pdf>

⁶¹ https://www.sthelens.gov.uk/media/9436/st-helens-shma-update-report-v33_final.pdf

⁶² https://www.liverpoolcityregion-ca.gov.uk/wp-content/uploads/SHELMA_Consultation.pdf

- 10.5. In terms of migration patterns, the 75+ age group accounts for a very small proportion of moves both IN 2.6% and OUT 3.3% (Source: ONS 2017 Detailed Migration data - within UK moves).
- 10.6. Even without any change in jobs over the projection period, the population change (due to ageing) is driving a large increase of the housing growth, a point acknowledged in Section 6.3.5 of the Local Plan Update⁶³. Assuming the ONS SNPPs are in the right ball park for the 75+ age group and bearing in mind that only small numbers of the 75+ age group move, then 367 of the total housing growth comes from the 75+ age group (from the 2014 SNHPs). That would leave $486 - 367 = 119$ dwellings for new jobs.
- 10.7. However, in order to accommodate 7,797 new jobs (Table 9, SHMA Update - Scenario 2 - Option 3) it would require a huge boost to the working age population. In rough terms, an extra 11,900 16-74 population (assuming 67% Economic Activity Rate and no change to unemployment rates or commuting rates) which translate to around 16,000 people (the 16-74s make up 70% of the total population) or an extra 940 people per annum (All ages). If you feed an extra 940 people each year into the population and household projections, this generates a household population of 930 (less Institutional Population of 1.1% as at 2033 - 2014 SNHPs) divided by the average household size (AHS) in 2033 (2.17, 2014 SNHPs) and vacancy rate of 3% gives 440 dwellings pa to add to the 367 for the 75+ which gives 807 dpa. The numbers of dwellings (and population) arising from the extra 7,797 jobs would be well above what is projected due to the age structure of St. Helens where the 75+ age group accounts for 71% of the increase. There is a clear disjoint in the relationship between jobs, dwellings and population.
- 10.8. This demonstrates the complete lack of demographic logic in assessing economic growth and jobs separately from population and household projections - they are inextricably linked and the results of changes should be consistent across all three outputs; population, dwellings and jobs. This demonstrates the disjoint between jobs led projections produced using one method (Oxford Economics) and demographic projections for population and households using another (Popgroup). There is a real need to cross-check the figures for all the outputs using the same model to ensure consistency.
- 10.9. It is not clear how OE produce their population projections, nor whether anyone has tested the employment growth figures against the POPGROUP model to assess the impact on dwellings and population change. The methodology for the OE population projections should to be assessed and tested against other recognised software to ensure consistency between jobs, population and dwellings.
- 10.10. MHCLG need to re-assess the housing need formula so that there is a link between population change, dwelling growth and jobs - they all go hand in hand. It also highlights the disjoint between Employment Led forecast and the impact on the dwellings required and population change. A formula that doesn't connect to the real world creates difficulties for all parties; the developers, Planning Authorities and the general public.
- 10.11. A recent press release by the National Audit Office comments: "For many years, the supply of new homes has failed to meet demand. From the flawed method for assessing the number of homes required, to the failure to ensure developers contribute fairly for infrastructure, it is clear the planning system is not working well.

⁶³ <https://www.sthelens.gov.uk/media/9525/local-plan-written-plan-web.pdf>

The government needs to take this much more seriously and ensure its new planning policies bring about the change that is needed.” Amyas Morse, the head of the NAO, 8 February 2019 ⁶⁴. The full report is entitled “*Planning for New Homes*” (See Summary Section #8 ⁶⁵).

The National Audit Office share the concerns of 55% of organisations who responded against the decision to use the 2014 SNHPs in the recently announced response to the Technical Consultation on updates to Planning Guidance⁶⁶ (See Question 1).

10.12. The commuting ratio for St. Helens is 1.21 (Source: 2011 Census), which shows a significant outflow for work i.e. more people living in the Borough than working there. This ratio has been held constant over the projection period (See 4.8 Updated SHMA⁶⁷) St. Helens Council should develop policies to reduce the commuting ratio. Having more jobs within St. Helens for St. Helens residents would reduce the numbers of new dwellings needed, as well as reduce traffic emissions and congestion.

10.13. St. Helens has relatively high unemployment rate compared to the other Local Authorities in the North West, with a 7.1% rate. There is no mention of policies to try and reduce unemployment rates to boost jobs for residents living within St. Helen. A 1%age point reduction, for example, would reduce the numbers of new dwelling needed by some 50 dpa
Reducing unemployment rates is a very sustainable way to improve the local economy without any additional infrastructure and should be a policy considered as part of the planning process.

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⁶⁴ <https://www.nao.org.uk/press-release/planning-for-new-homes/>

⁶⁵ <https://www.nao.org.uk/wp-content/uploads/2019/02/Planning-for-new-homes.pdf>

⁶⁶

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779792/LHN_Gov_response.p](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779792/LHN_Gov_response.pdf)

⁶⁷ https://www.sthelens.gov.uk/media/9436/st-helens-shma-update-report-v33_final.pdf

Glossary

A8 - EU Accession Countries. Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia, Slovenia

BME - Black and Minority Ethnic

BSPS - British Society for Population Studies

CLIP - Central and Local Information Partnership

CPRE - Campaign to Protect Rural England

DPA - Dwellings per annum.

DWP - Department for Work and Pensions

GVA - Gross Value Added which is the increase in the value of the economy due to the production of goods and services.

HESA - Higher Education Statistics Agency

HMA - Housing Market Area

HMRC - Her Majesty's Revenue and Customs

HRR - Household Representative Rates = Headship Rates

LAMI - Local Authority Migration Indicator (ONS Tool for Migration analysis)

LPEG - Local Plans Expert Group

LTIM - Long Term International Migration

MHCLG - Ministry for Housing, Communities and Local Government

MYEs - Mid Year Estimates (ONS)

NAO - National Audit Office

NINO - National Insurance Number

NOMIS - National Online Manpower Information System (ONS)

NRS - National Records Scotland

NPP - National Population Projections (ONS)

NPPF - National Policy Planning Framework

OAHN - Objectively Assessed Housing Need = OAN

OBR - Office for Budgetary Responsibility

OE- Oxford Economics

ONS - Office for National Statistics

PASC - Public Administration Select Committee

POST - Parliamentary Office Science & Technology

RFMYEs - Rolled Forwards Mid Year Estimates (ONS)

SHGBA - St. Helens Green Belt Association

SHELMA - Strategic Housing and Employment Land Market Assessment

SHMA - Strategic Market Housing Assessment

SHLAA - Strategic Housing Land Availability Assessment

SNPPs - Sub-National Population Projections (ONS)

SNHPs - Sub-National Household Projections (2014 Based MHCLG, 2016 Based ONS)

T&CP - Town & Country Planning

UKSA - United Kingdom Statistics Authority

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St. Helens Borough Local Plan 2020-2035

Independent Economist's Report

Evidence by Dr. Glenn Athey

11 March 2019

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1. Expertise in economics and economic development

- 1.1. My name is Glenn Athey, I have a Ph.D in regional economic development, a Master's degree in European Political Economy and a BA honours degree in Economics and Geography. I am the Managing Director at Athey Consulting Limited (trading as My Local Economy) which has been trading for seven years, and specialises in all aspects of economic analysis, statistical analysis, and local and regional economic development. I am particularly experienced in analysing the characteristics and performance of local economies and labour markets, and formulating and advising on local economic and skills strategies. I have 23 years of experience as an economist, policy and strategy advisor working in this field.
- 1.2. I have also undertaken economic analysis and strategy development work for the London Borough of Haringey, Hertfordshire County Council, Stockton-on-Tees Borough Council, Harlow Council, Luton Borough Council, Norfolk County, Suffolk County, West of England Combined Authority, Skills Development Scotland and the Welsh Government.
- 1.3. I have a track record working as a senior officer within economic development organisations. Between 2001 and 2011 I worked as: Director of Research and Intelligence at the East of England Development Agency, Head of Business Economics and Policy at London Development Agency, and Senior Labour Market Economist at Scottish Enterprise.
- 1.4. I have worked with economic forecasting consultancies since 2001, including Cambridge Econometrics, Oxford Economics, Experian and the University of Warwick. I have commissioned forecasts as a public sector client, used them, and sat on the technical working groups for the development or regional and local forecasting models.
- 1.5. Since 2011 I have been the Managing Director of Athey Consulting Limited, a consultancy trading as “My Local Economy”, which offers expert advice, analysis, and support to local and regional authorities.,
- 1.6. **This paper** contains discussion of the economic forecasts and assumptions that drive the St Helens Borough Council Draft Local Plan.
- 1.7. The evidence which I have prepared and provided in this report is true and I confirm that the opinions expressed are true and professional opinions.

Dr. Glenn Athey

11 March 2019

2. Employment land policies in the Draft Local Plan

ST HELENS BOROUGH COUNCIL EMPLOYMENT LAND NEEDS STUDY, ADDENDUM REPORT, AMENDED JANUARY 2019

- 2.1. The 2019 Employment Land Needs Study considers the Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA), and states that “The Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA) (March 2018) considered the objective assessed needs for large scale B8 warehousing and distribution (over 100,000 sq ft) for the Liverpool City Region – which forecast the land use requirements to 2043 of the large-scale B8 sector, defined as in excess of 9,000 sqm (approximately 100,000 sq ft).
- 2.2. The 2015 Employment Lands Need Study was revised in the January 2019 Addendum report, but it is noted that there is an identified future demand for logistics and warehousing land and premises as a result of the Parkside Intermodal Rail Freight Exchange proposals – on the former Parkside Colliery Site – a development of up to 750,000 sq ft. Section 1.4, p2. “The additional demand for employment land generated by major projects in the region (SuperPort, Parkside) and the additional spur of the logistics sector above past trends was also forecast. As a result, the following OAN for employment land was forecast. The significant majority (about 80 percent) of the additional land demand generated through the major projects was forecast to be for B8 warehousing uses.” This has been informed by a study undertaken by AECOM – the Parkside Logistics and Rail Freight Interchange Study.
- 2.3. The Employment Land Needs Study Addendum Report, January 2019 also refers to the role of economic forecasts in informing employment land policy proposals (Quoting from p.10.) “Oxford Economics prepared a jobs growth scenario forecast for the LEP which took account of transformational developments that are intended for the region in coming years. This work has informed the SHELMA. The key findings of this study are:

The Liverpool City Region is forecast to have an additional 109,200 jobs by 2040 over 2016 levels in the growth scenario, compared to 34,100 additional jobs in the baseline scenario.

- St Helens is projected to have the second highest additional employment (behind only Liverpool City) in the growth scenario, with an additional 18,700 jobs projected for the borough. This compares to an additional 4,700 jobs over the same period for the baseline scenario. This took account of the large amount of potential B1/2/8 employment sites in St. Helens.
- Significantly, the growth scenario assumes strong growth in the 2016-26 period before tapering off, reflecting the development activity anticipated over the coming decade.
- The growth scenario assumes a higher in-migration to the City Region.
- It is assumed that the resident employment rate would increase, compared to the baseline scenario, due to the increased availability of employment opportunities through the transformational developments.
- The largest growth sectors by employment numbers in St Helens in the growth scenario are anticipated to be warehousing and support services (+3,600 jobs) and land transport (+3,200

jobs) reflecting the key drivers of employment in the market (data provided in spreadsheets supporting this document).

- Manufacturing in St Helens is anticipated to grow by 2,000 jobs, a significant change from the baseline scenario which assumed declining employment in this sector. This is driven by the increasing availability of strategic industrial land in St Helens in coming years that would encourage manufacturers to locate to the borough, with further logistics infrastructure and warehousing capacity allowing for improved conditions to deliver goods to markets.”

2.4. Further quoting from p10-11. Of the Employment Land Needs Study Addendum Report, January 2019: **“This modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focussed on logistics and warehousing schemes, including the potential Green Belt sites around Haydock, west of Omega and Parkside West and East.”**

2.5. What is clear is that if this statement is valid, that St Helens Borough Council itself set the criteria for the “Transformational Growth” Scenario including use of green belt land. This is a subjective policy scenario, and not an objectively based needs assessment of economic and market trends.

2.6. What is not clear is the role that the Oxford Economics Transformational Growth Scenario has played in forming employment land allocations – this is not transparent or clear from the Draft Local Plan and its supporting documents.

2.7. What is perhaps clear is that St Helens Borough Council have directly informed a set of economic aspirations, that have now become joint planning policy – that endorses allocating new employment sites on green belt land and assuming these are built and occupied.

FIGURE 1: PROPOSED EMPLOYMENT LAND ALLOCATION FOR ST HELENS DRAFT LOCAL PLAN

Table 7 – Breakdown of Employment Land Need by Type

Employment Type	Hectares
B1(a) Office	10-15
B1(b) Research and development	1-4
B1(c) Light Industry	15-20
B2 General industrial	55-70
B8 Storage and Distribution	110-155
Total employment needs	190-239

Source: BE Group analysis

3. Analysing the economic statistics and projections

INTRODUCTION

- 3.1. The starting point for assessing the need for employment land is the 2016 Liverpool LEP Transformational Growth Scenario Forecast. As far as I am aware (as the original forecasts are not available publicly – as is pointed out throughout this briefing paper) – this is based on local authority submissions concerning complete take-up of most of existing employment sites, and aspirations to designate more employment sites. There were also baseline forecasts based on existing trends in the Liverpool City Region and the UK.
- 3.2. However, whilst the Oxford Economics forecasts are integral to the Liverpool City Region SHELMA, and are referred to in documents supporting the SHBC Local Plan, and the LEP Economic Growth Strategy, the forecasts are not available publicly to appraise. The forecasts, data, and details about assumptions or methodology are not publicly available and were not available to support the SHBC draft local plan or the public consultation.
- 3.3. The Oxford Economics “Transformational Growth” forecasts (2016) are all quoted as being critical in informing assumptions about industry growth, jobs growth and the demand for employment land but are nowhere to be accessed. Formal enquiries made to SHBC and Liverpool City Region LEP have not resulted in the Oxford Economics forecasts or data being provided or made public. This document is not publicly available, yet underpins the LCR SHELMA, and all subsequent local plans in the Liverpool City Region. It is highly unusual to have such forecasts, material to the planning policies, not being made publicly available.
- 3.4. For other non-statutory spatial strategies and local plans, forecasts are usually made publicly available. For example:
 - > Joint Core Strategy – Cheltenham, Tewkesbury and Gloucester
<https://www.jointcorestrategy.org/examination> – see Assessment of updated economic forecasts, Nathaniel Lichfield and Partners, April 2014
 - > Cambridgeshire and Peterborough Joint Strategic Planning Unity -
<http://cambridgeshire.wpengine.com/document-library/> - see under “Economy and Employment (this has now been superseded by development of non-statutory spatial strategy for the GC Combined Authority area)

USE OF FORECASTS

- 3.5. Generally forecasts are used cautiously – as an indication of the possible direction of travel. Use of detailed figures from forecasts for decision making is generally discouraged.
- 3.6. Policy-on forecasts, those that are modelled from a policy outcome (such as build out of employment land) are generally only used to understand scenarios. As a planning tool they are limited – as there are so many barriers to development and building work. It is also doubtful to assume policy continuity for the next 25 years – after all, city regions and mayors are a relatively recent policy change (last 5 years), where in the past 15 years we have seen RDAs, LEPs, and combined authorities subsequently be implemented, largely to replace each other, not to mention the lack of parliamentary majority government twice in the past nine years, and the Brexit issue emerging in 2016.

- 3.7. It is unusual to develop a ‘policy-on’ forecast solely from land use / building and capital investments. This is because these types of scenarios can be highly speculative and subjective – i.e. determining final occupation and use of a site – particularly challenging for a greenfield site. Another reason is because the viability of these sites is often highly contingent on transport access, infrastructure and services. For example – getting electricity supply to a new employment site on greenfield land can often take many years.
- 3.8. There have been significant changes since the 2016 forecasts, and use of forecasts generally. The elephant in the room is Brexit, and the impact that this will have on future economic growth and structural changes in the economy. Virtually all reliable economic models predict a negative effect of Brexit on the UK economy, on any outcome – from full customs union and free market to hard Brexit. The negative consequences for northern regions, including LCR, are more severe.
- 3.9. The 2016 Baseline and Growth Scenario forecasts were originated shortly after the Brexit vote and this places them in a very uncertain context.

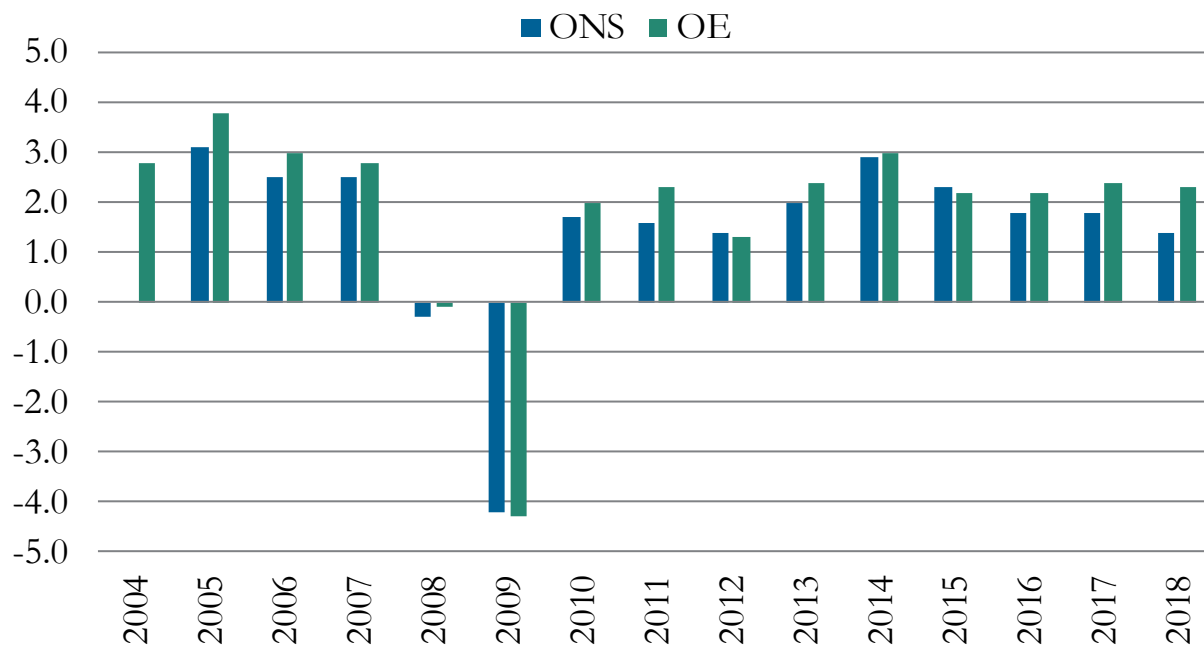
HISTORIC GROWTH TRENDS

Economic growth (economic output)

- 3.10. **The Oxford Economics 2016 forecasts lack credibility compared to past and current trends – they are far too optimistic.** As can be seen in **Figure 2 and 3**, Oxford Economics has consistently been more optimistic in its estimates of UK economic growth, compared to official estimates. This is especially apparent in recent years, where Oxford economics has projected the rate of growth at 2.2 per cent (2016), 2.4 per cent (2017) and 2.3 per cent (2018) compared the actual out-turn, as estimated by the Office for National Statistics at 1.8 per cent (2016), 1.8 per cent (2017) and 1.4 per cent (2018).
- 3.11. As apparent from **Figure 4**, from the 2016 forecasts, Oxford Economics’s outlook for 2019 and 2020 in both the baseline scenario and transformational scenario is very optimistic compared to more recent official forecasts by the Office for Budget Responsibility and the Average of Independent Forecasters as calculated by HM Treasury in February 2019. The Oxford Economics Transformational Scenario projects twice the rate of growth for 2019 and 2020 compared to the average of independent forecasters.
- 3.12. Oxford Economics’s 2016 baseline projections of economic growth for the Liverpool City Region do not credibly relate to historical trends, and the transformational growth scenario seems very optimistic. **Figure 6** examines the ONS statistics on economic growth (GVA growth) for Liverpool City Region and East Merseyside Nuts 2 area. For small geographies, such as local authority districts, statistics are less accurate for economic growth. As can be seen, the recent 10-year (2008-2017) annual rate of economic growth for Liverpool City Region is 0.0 per cent – zero growth per annum. The average annual 5-year (2013-2017) rate of growth is 1.0 per cent per annum. This contrasts markedly with the Oxford Economics 2016 baseline forecast of 1.9 per cent growth per annum between 2016 and 2040, and the transformational growth scenario forecast of 2.5 per cent per annum. Even the baseline forecasts seems to significantly stretch credibility – being twice the rate of growth of the most recent 5-year period.
- 3.13. Economic forecasts can become dated very quickly, particularly if the economic environment is volatile, with unexpected events and new dynamics. Of course, Brexit is a significant uncertainty. Economic Forecasts do not cope well with unexpected events or ‘paradigm shifts’ in the global and domestic economic environment or dynamics. Economic Forecasts are also frequently updated, as new or revised historical data becomes available – which happens on a regular basis –

for some datasets annually, for others quarterly. It is no surprise that the Oxford Economics 2016 Forecast looks optimistic, as they are almost three years out of date. It is unusual not to have these forecasts updated more regularly for statutory planning policies. It is therefore sensible to be cautious when basing land use and planning policies on economic forecasts – it is better to take a reasonable view based on past trends, rather than to expect transformational growth.

FIGURE 2: COMPARING OXFORD ECONOMICS FORECAST WITH OFFICE FOR NATIONAL STATISTICS ESTIMATES OF GVA GROWTH (PER CENT)



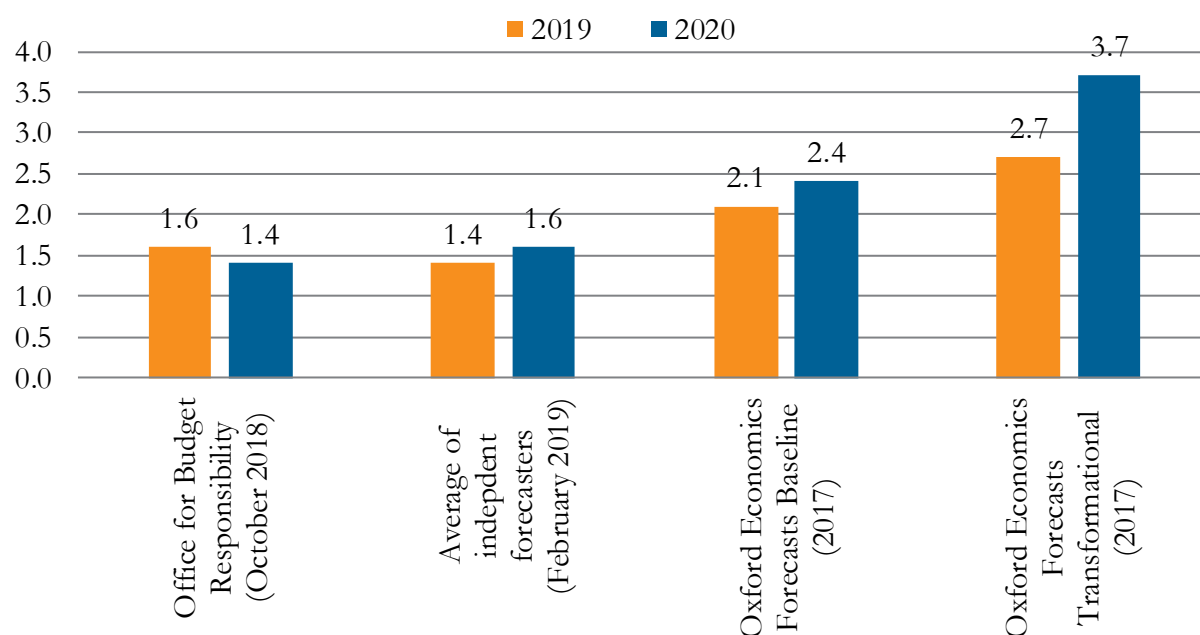
Source: Office for National Statistics and Oxford Economics.

FIGURE 3: COMPARING OXFORD ECONOMICS FORECAST WITH OFFICE FOR NATIONAL STATISTICS ESTIMATES OF GVA GROWTH (PER CENT)

	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
ONS	2.3	3.1	2.5	2.5	-0.3	-4.2	1.7	1.6	1.4	2.0	2.9	2.3	1.8	1.8	1.4
OE	2.8	3.8	3.0	2.8	-0.1	-4.3	2.0	2.3	1.3	2.4	3.0	2.2	2.2	2.4	2.3

Source: Office for National Statistics and Oxford Economics.

FIGURE 4: COMPARING SHORT-RUN FORECASTS FOR THE UK ECONOMY



Source: Office for Budget Responsibility, HM Treasury, Oxford Economics.

FIGURE 5: NOMINAL RATES OF ECONOMIC GROWTH (THAT DO NOT ACCOUNT FOR INFLATION)

NOMINAL GROWTH RATES (THAT DO NOT ACCOUNT FOR INFLATION)								
	Annual growth rates					Compound Annual Growth Rates		
	2013	2014	2015	2016	2017	20-year 1998- 2017	10-year 2008- 2017	5-year 2013- 2017
Liverpool City Region (NUTS2 Merseyside)	2.5%	5.0%	4.0%	-0.1%	2.8%	3.1%	1.4%	2.3%
East Merseyside NUTS2	4.5%	7.9%	5.0%	-1.3%	3.0%	3.7%	2.1%	2.9%
Liverpool NUTS2	0.9%	5.0%	3.0%	-0.1%	3.0%	3.4%	1.4%	2.2%
Sefton NUTS2	1.3%	0.8%	3.7%	2.9%	1.4%	1.9%	0.4%	1.7%
Wirral NUTS2	3.7%	3.3%	4.5%	0.0%	3.3%	2.3%	1.1%	2.2%
UK	3.8%	4.6%	2.8%	3.8%	3.6%	3.6%	2.4%	3.0%

FIGURE 6: ACTUAL REAL ECONOMIC (GVA) GROWTH RATES (THAT ACCOUNT FOR INFLATION - WITH NATIONAL GDP DEFLATORS APPLIED) VERSUS PROJECTED GROWTH RATES (OXFORD ECONOMICS)

ACTUAL GVA GROWTH RATES (OFFICE FOR NATIONAL STATISTICS)									FORECAST GVA GROWTH RATES: OXFORD ECONOMICS 2017 FORECASTS	
	Annual growth rates					Compound Annual Growth Rates			ANNUAL RATE OF GROWTH 2016-2040	
	2013	2014	2015	2016	2017	20-year 1998- 2017	10-year 2008- 2017	5-year 2013- 2017	Baseline	Trans-formational
Liverpool City Region (NUTS2 Merseyside)	0.6%	3.3%	3.5%	-2.1%	0.6%	1.2%	0.0%	1.0%	1.9%	2.5%
East Merseyside NUTS2	2.6%	6.0%	4.6%	-3.3%	0.8%	1.9%	0.6%	1.6%		
Liverpool NUTS2	-1.0%	3.2%	2.5%	-2.1%	0.8%	1.6%	-0.1%	0.9%		
Sefton NUTS2	-0.6%	-0.9%	3.2%	0.8%	-0.8%	0.1%	-1.0%	0.5%		
Wirral NUTS2	1.8%	1.6%	4.0%	-2.1%	1.1%	0.4%	-0.4%	0.9%		
UK	1.9%	2.9%	2.4%	1.7%	1.4%	1.8%	0.9%	1.7%		

Jobs growth

3.14. By contrast, Oxford Economics's 2017 projections for jobs growth are lower than the historical trend for both Workforce Jobs in **Figure 7** and employee jobs in **Figure 8**.

FIGURE 7: WORKFORCE JOBS

Area	Annual rates of jobs growth					Average annual rate of growth (compound rate)			OXFORD ECONOMICS FORECASTS – ANNUAL RATE OF GROWTH 2016-2040	
	2013	2014	2015	2016	2017	CAGR 18-year	CAGR 10-year	CAGR 5-year	Baseline	Transformational
Liverpool City Region	0.6%	2.0%	2.6%	2.0%	3.3%	0.9%	1.0%	2.0%	0.2%	0.6%
Halton	-9.8%	9.1%	3.3%	4.8%	6.2%	1.2%	1.8%	4.6%		
Knowsley	1.6%	4.7%	3.0%	4.3%	-2.8%	1.3%	1.2%	1.8%		
Liverpool	1.6%	2.0%	2.7%	3.0%	2.2%	1.4%	0.9%	2.0%		
Sefton	6.2%	-1.9%	0.0%	2.0%	3.9%	-0.2%	0.5%	0.8%		
St. Helens	-2.9%	3.0%	-1.5%	0.0%	6.0%	0.8%	0.6%	1.5%		
Wirral	1.8%	-0.9%	6.3%	-1.7%	6.0%	0.6%	1.1%	1.9%		
England	1.6%	2.8%	3.1%	1.9%	1.8%	1.0%	1.3%	1.9%		

FIGURE 8: EMPLOYEE JOBS 2009 TO 2017

Area	BRES methodology I							"New" BRES Methodology II		
	2009	2010	2011	2012	2013	2014	2015	2015	2016	2017
Liverpool City Region	584,000	576,000	579,500	584,000	577,500	591,000	598,500	604,500	617,500	626,500
Halton	51,000	52,500	54,000	59,000	51,500	55,000	55,500	55,500	59,000	61,500
Knowsley	55,500	55,500	54,500	56,000	58,000	61,000	64,000	64,500	67,000	64,500
Liverpool	228,500	222,500	228,500	226,500	227,500	230,500	230,000	231,500	240,500	242,500
Sefton	92,500	91,500	88,000	85,000	87,000	87,000	89,500	91,000	92,000	92,000
St. Helens	60,500	60,000	59,500	61,500	59,500	60,000	59,000	60,000	59,000	62,500
Wirral	96,000	94,500	95,000	96,000	94,000	98,000	100,500	101,500	99,500	103,500
England	23,064,500	23,085,500	23,073,000	23,256,000	23,561,000	24,286,000	24,867,500	25,044,500	25,477,500	25,820,500
Great Britain	26,642,500	26,581,500	26,593,500	26,753,000	27,096,500	27,931,500	28,533,500	28,738,500	29,214,000	29,550,000

FIGURE 9: ANNUAL RATES OF EMPLOYEE JOBS GROWTH

Area	Annual rates of jobs growth						Average annual rate of growth (compound rate)		OXFORD ECONOMICS FORECASTS – ANNUAL RATE OF GROWTH 2016-2040	
	2012	2013	2014	2015	2016	2017	CAGR 5-year 2011-2015	CAGR 3-year 2015-2017	Baseline	Transformational
Liverpool City Region	0.8%	-1.1%	2.3%	1.3%	2.2%	1.5%	0.6%	1.2%	0.2%	0.6%
Halton	9.3%	-12.7%	6.8%	0.9%	6.3%	4.2%	0.5%	3.5%		
Knowsley	2.8%	3.6%	5.2%	4.9%	3.9%	-3.7%	3.3%	0.0%		
Liverpool	-0.9%	0.4%	1.3%	-0.2%	3.9%	0.8%	0.1%	1.6%		
Sefton	-3.4%	2.4%	0.0%	2.9%	1.1%	0.0%	0.3%	0.4%		
St. Helens	3.4%	-3.3%	0.8%	-1.7%	-1.7%	5.9%	-0.2%	1.4%		
Wirral	1.1%	-2.1%	4.3%	2.6%	-2.0%	4.0%	1.1%	0.7%		
England	0.8%	1.3%	3.1%	2.4%	1.7%	1.3%	1.5%	1.0%		
Great Britain	0.6%	1.3%	3.1%	2.2%	1.7%	1.2%	1.4%	0.9%		

Industry growth trends

- 3.15. **Figures 11 to 12** examine historical official data from the Office for National Statistics concerning employment by detailed industry. Trends for 2011-2015 (five-year) and 2015-2017 (three-year) are analysed. Data is available from 2009 to 2017 but there is no continuity of data after 2015, because of a change in the methodology used by the Business Register and Employment Survey after 2015. The Business Register and Employment Survey (BRES) is the official source of employee and employment estimates by detailed geography and industry. The methodology for the survey was changed from 2016 to account more accurately for solely PAYE based businesses with less than 20 employees.
- 3.16. According to **Figure 11**, the main growth industries for employment in Liverpool City Region include:
- 86 : Human health activities (+6,000 employees 2011-2015, or +2.0 per cent)
 - 56 : Food and beverage service activities (+5,000 employees 2011-2015, or +3.1 per cent)
 - 45 : Wholesale and retail trade and repair of motor vehicles and motorcycles (+ 4,000 employees 2011-2015, or +4.1 per cent)
 - 78 : Employment activities (employment agencies) (+3,500 employees 2011-2015, or +4.4 per cent)
 - 29 : Manufacture of motor vehicles, trailers and semi-trailers (+3,000 employees 2011-2015, or + 13.2 per cent)
 - 52 : Warehousing and support activities for transportation (+3,000 employees 2011-2015, or +5.6 per cent)
 - 85 : Education (+3,000 employees 2011-2015, or +1.1 per cent)
- 3.17. The main declines in employment occurred in the following industries in Liverpool City Region:
- 84 : Public administration and defence; compulsory social security(-9,000 employees 2011-2015, or -4.3 per cent)
 - 58 : Publishing activities(-4,750 employees 2011-2015, or -23.1 per cent)
 - 64 : Financial service activities, except insurance and pension funding(-2,000 employees 2011-2015, or -4.1%)
- 3.18. According to **Figure 12**, the main growth industries for employment in St Helens Borough include:
- 78 : Employment activities (1,200 employees 2011-2015, or +26.0 per cent)
 - 46 : Wholesale trade, except of motor vehicles and motorcycles (1,000 employees 2011-2015, or +7.6 per cent)
 - 52 : Warehousing and support activities for transportation (600 employees 2011-2015, or +5.3 per cent)
 - 80 : Security and investigation activities (600 employees 2011-2015, or +15.4 per cent)
 - 93 : Sports activities and amusement and recreation activities (600 employees 2011-2015, or +15.4 per cent)
 - 47 : Retail trade, except of motor vehicles and motorcycles (500 employees 2011-2015, or +1.5 per cent)
- 3.19. The main declines in employment occurred in the following industries in St Helens Borough:
- 81 : Services to buildings and landscape activities (-1500 employees 2011-2015, or -19.7 per cent)
 - 23 : Manufacture of other non-metallic mineral products (-800 employees 2011-2015, or -7.8 per cent)

- 49 : Land transport and transport via pipelines (-600 employees 2011-2015, or -5.6 per cent)
- 25 : Manufacture of fabricated metal products, except machinery and equipment (-375 employees 2011-2015, or -7.8 per cent)
- 43 : Specialised construction activities (-400 employees 2011-2015, or -3.6 per cent)
- 88 : Social work activities without accommodation (-400 employees 2011-2015, or -3.6 per cent)
- 42 : Civil engineering (-300 employees 2011-2015, or -per cent)
- 70 : Activities of head offices; management consultancy activities (-300 employees 2011-2015, or -9.0 per cent)

3.20. In sum, there has been significant jobs growth in wholesale, warehousing and transportation activities in LCR. However there has also been significant jobs growth in office based activities, and in industrial activities in LCR. In St Helens, jobs growth in Storage and Distribution has been more than offset by loss in Light Industrial jobs. This is reflected in **Figure 10** below which summarises jobs change by planning use class.

FIGURE 10: CHANGE IN EMPLOYEE JOBS BY USE CLASS 2011 TO 2015

JOBS BY USE CLASS	LIVERPOOL CITY REGION				ST HELENS			
	2011	2015	2011-2015	2011-2015	2011	2015	2011-2015	2011-2015
A retail	106,600	115,000	8,300	7.8%	11,100	12,100	1,000	9.2%
B1(a) Office	90,600	99,900	9,300	10.3%	8,200	10,300	2,100	25.1%
B1(b) R&D	3,500	3,800	300	7.1%	200	200	0	-19.1%
B1(c) Light Industrial	17,900	20,000	2,200	12.1%	2,700	1,200	-1,600	-56.6%
B2 General industrial	58,200	58,800	600	1.1%	7,000	6,100	-900	-13.0%
B8 Storage and Distribution	31,000	38,500	7,500	24.2%	4,900	6,500	1,600	32.0%
Sui Generis use	14,500	15,900	1,300	9.2%	2,700	2,100	-600	-20.9%

Source: Business Register and Employment Survey, Office for National Statistics.

FIGURE 11: CHANGE IN EMPLOYEE JOBS BY INDUSTRY – LIVERPOOL CITY REGION

LIVERPOOL CITY REGION EMPLOYMENT BY INDUSTRY (2-DIGIT SIC)	Total 2009	Total 2011	Total 2015	Growth 2009-2015	Growth 2011-2015	Annual growth rate 7-year 2009-2015	Annual growth rate 5-year 2011-2015
01 : Crop and animal production, hunting etc	300	200	300	0	0	0.0%	3.5%
02 : Forestry and logging	0	0	0	0	0	25.8%	38.0%
03 : Fishing and aquaculture	0	0	0	0	0	-	21.7%
05 : Mining of coal and lignite	0	0	0	0	0	-	-
06 : Extraction of crude petroleum and natural gas	0	0	0	0	0	-	-
07 : Mining of metal ores	0	0	0	0	0	-	-
08 : Other mining and quarrying	100	0	100	100	100	8.3%	32.0%
09 : Mining support service activities	0	0	0	0	0	-	-
10 : Manufacture of food products	7,000	6,500	6,000	-1,000	-500	-2.2%	-1.6%
11 : Manufacture of beverages	500	500	500	-100	-100	-1.5%	-2.1%
12 : Manufacture of tobacco products	0	0	0	0	0	-	-
13 : Manufacture of textiles	900	700	800	-100	200	-0.9%	4.2%
14 : Manufacture of wearing apparel	300	300	100	-200	-200	-11.2%	-18.1%
15 : Manufacture of leather and related products	0	0	0	0	0	21.9%	21.7%
16 : Manufacture of wood and of products	1,400	1,400	700	-700	-700	-10.2%	-13.9%
17 : Manufacture of paper and paper products	700	800	1,000	400	300	6.3%	5.9%
18 : Printing and reproduction of recorded media	2,800	2,800	1,900	-900	-900	-5.3%	-7.4%
19 : Manufacture of coke and refined petroleum products	400	400	200	-200	-200	-8.2%	-11.3%
20 : Manufacture of chemicals and chemical products	6,000	6,000	4,300	-1,800	-1,800	-4.8%	-6.7%
21 : Manufacture of basic pharmaceutical products preparations	2,800	2,300	2,300	-500	0	-2.8%	0.0%
22 : Manufacture of rubber and plastic products	2,500	2,400	2,500	0	100	0.0%	1.0%
23 : Manufacture of other non-metallic mineral products	2,800	4,500	2,800	0	-1,800	0.0%	-9.4%
24 : Manufacture of basic metals	800	900	500	-300	-400	-6.5%	-11.1%
25 : Manufacture of fabricated metal products	6,000	5,500	5,000	-1,000	-500	-2.6%	-1.9%
26 : Manufacture of computer, electronic and optical products	1,000	1,600	1,100	100	-500	1.7%	-7.1%
27 : Manufacture of electrical equipment	1,500	2,400	2,400	900	0	6.8%	0.0%
28 : Manufacture of machinery and equipment n.e.c.	2,400	2,300	2,100	-300	-100	-1.6%	-1.1%
29 : Manufacture of motor vehicles, trailers and semi-trailers	4,000	3,500	6,500	2,500	3,000	7.2%	13.2%
30 : Manufacture of other transport equipment	2,300	2,300	2,100	-100	-100	-0.8%	-1.1%
31 : Manufacture of furniture	1,600	1,000	1,000	-700	-100	-7.4%	-1.0%
32 : Other manufacturing	3,000	800	1,100	-1,900	300	-13.1%	7.1%
33 : Repair and installation of machinery and equipment	1,500	1,000	1,500	0	500	0.0%	8.4%
35 : Electricity, gas, steam and air conditioning supply	900	900	1,000	200	100	2.3%	2.1%
36 : Water collection, treatment and supply	300	100	100	-200	0	-11.2%	3.7%
37 : Sewerage	300	300	300	-100	0	-3.7%	-1.9%
38 : Waste collection, treatment and disposal activities	1,900	2,800	3,000	1,100	300	6.9%	1.8%
39 : Remediation activities and other waste management services	0	0	200	200	200	-	-
41 : Construction of buildings	8,500	5,000	5,500	-3,000	500	-6.0%	1.9%
42 : Civil engineering	3,500	3,800	2,300	-1,300	-1,500	-6.1%	-9.7%
43 : Specialised construction activities	15,500	15,500	15,500	0	0	0.0%	0.0%
45 : Wholesale and retail trade and repair of motor vehicles and motorcycles	7,500	6,500	6,500	-1,000	0	-2.0%	0.0%
46 : Wholesale trade, except of motor vehicles and motorcycles	16,500	18,000	22,000	5,500	4,000	4.2%	4.1%
47 : Retail trade, except of motor vehicles and motorcycles	64,000	63,500	66,000	2,000	2,500	0.4%	0.8%
49 : Land transport and transport via pipelines	11,000	13,000	14,500	3,500	1,500	4.0%	2.2%
50 : Water transport	500	600	300	-300	-400	-9.4%	-16.1%
51 : Air transport	600	700	700	100	0	1.2%	0.0%
52 : Warehousing and support activities for transportation	8,500	9,500	12,500	4,000	3,000	5.7%	5.6%
53 : Postal and courier activities	6,000	3,500	4,000	-2,000	500	-5.6%	2.7%
55 : Accommodation	5,500	6,500	7,000	1,500	500	3.5%	1.5%
56 : Food and beverage service activities	33,000	30,000	35,000	2,000	5,000	0.8%	3.1%
58 : Publishing activities	1,400	6,500	1,800	400	-4,800	3.5%	-23.1%
59 : Motion picture, video and television programme production, sound recording and music publishing activities	1,300	1,000	1,000	-300	-100	-3.8%	-1.0%
60 : Programming and broadcasting activities	0	200	100	0	-100	15.8%	-19.7%
61 : Telecommunications	4,500	4,300	4,500	0	300	0.0%	1.1%
62 : Computer programming, consultancy and related activities	6,000	5,500	7,000	1,000	1,500	2.2%	4.9%
63 : Information service activities	700	800	1,000	400	200	6.3%	4.6%
64 : Financial service activities	11,500	10,500	8,500	-3,000	-2,000	-4.2%	-4.1%
65 : Insurance, reinsurance and pension funding	3,300	3,000	2,100	-1,100	-900	-5.9%	-6.7%
66 : Activities auxiliary to financial services and insurance activities	5,500	4,500	4,300	-1,300	-300	-3.6%	-1.1%
68 : Real estate activities	9,500	8,500	9,000	-500	500	-0.8%	1.1%
69 : Legal and accounting activities	11,500	13,500	15,000	3,500	1,500	3.9%	2.1%
70 : Activities of head offices; management consultancy activities	6,000	6,500	7,000	1,000	500	2.2%	1.5%

LIVERPOOL CITY REGION EMPLOYMENT BY INDUSTRY (2-DIGIT SIC)	Total 2009	Total 2011	Total 2015	Growth 2009-2015	Growth 2011-2015	Annual growth rate 7-year 2009-2015	Annual growth rate 5-year 2011-2015
71 : Architectural and engineering activities; technical testing and analysis	7,000	6,500	7,000	0	500	0.0%	1.5%
72 : Scientific research and development	1,000	2,000	1,500	600	-500	6.7%	-5.6%
73 : Advertising and market research	1,100	1,300	1,300	100	0	1.5%	0.0%
74 : Other professional, scientific and technical activities	1,600	1,500	2,300	600	800	4.8%	8.4%
75 : Veterinary activities	1,000	400	1,000	100	600	0.7%	20.1%
77 : Rental and leasing activities	2,500	4,000	4,300	1,800	300	7.9%	1.2%
78 : Employment activities	10,500	14,500	18,000	7,500	3,500	8.0%	4.4%
79 : Travel agency, tour operator and other reservation service and related activities	700	1,100	1,000	300	-200	4.5%	-3.3%
80 : Security and investigation activities	3,000	4,000	5,500	2,500	1,500	9.0%	6.6%
81 : Services to buildings and landscape activities	9,000	11,000	12,500	3,500	1,500	4.8%	2.6%
82 : Office administrative, office support and other business support activities	6,000	7,500	10,000	4,000	2,500	7.5%	5.9%
84 : Public administration and defence; compulsory social security	49,500	45,500	36,500	-13,000	-9,000	-4.3%	-4.3%
85 : Education	61,500	55,500	58,500	-3,000	3,000	-0.7%	1.1%
86 : Human health activities	59,000	58,500	64,500	5,500	6,000	1.3%	2.0%
87 : Residential care activities	18,500	20,500	20,000	1,500	-500	1.1%	-0.5%
88 : Social work activities without accommodation	24,500	26,000	24,500	0	-1,500	0.0%	-1.2%
90 : Creative, arts and entertainment activities	1,000	800	1,600	700	800	8.0%	15.2%
91 : Libraries, archives, museums and other cultural activities	2,000	2,100	1,500	-500	-600	-4.0%	-6.7%
92 : Gambling and betting activities	3,500	3,500	3,800	300	300	1.0%	1.4%
93 : Sports activities and amusement and recreation activities	10,000	6,500	7,500	-2,500	1,000	-4.0%	2.9%
94 : Activities of membership organisations	3,800	4,500	4,000	300	-500	0.9%	-2.3%
95 : Repair of computers and personal and household goods	1,400	1,000	1,000	-400	0	-4.4%	0.0%
96 : Other personal service activities	6,500	5,500	6,500	0	1,000	0.0%	3.4%
97 : Activities of households as employers of domestic personnel	0	0	0	0	0	-	-
98 : Undifferentiated goods- and services-producing activities of private households for own use	0	0	0	0	0	-	-
99 : Activities of extraterritorial organisations and bodies	0	0	0	0	0	-	-
Column Total	584,000	579,500	598,500	14,500	19,000	0.4%	0.6%

Source: Business Register and Employment Survey, Office for National Statistics.

FIGURE 11: CHANGE IN EMPLOYEE JOBS BY INDUSTRY – ST HELENS BOROUGH

ST HELENS BOROUGH EMPLOYMENT BY INDUSTRY (2-DIGIT SIC)	Total 2009	Total 2011	Total 2015	Growth 2009-2015	Growth 2011-2015	Annual growth rate 7-year 2009-2015	Annual growth rate 5-year 2011-2015
01 : Crop and animal production, hunting etc	200	200	300	0	100	1.5%	4.6%
02 : Forestry and logging	0	0	0	0	0	-	-
03 : Fishing and aquaculture	0	0	0	0	0	-	-
05 : Mining of coal and lignite	0	0	0	0	0	-	-
06 : Extraction of crude petroleum and natural gas	0	0	0	0	0	-	-
07 : Mining of metal ores	0	0	0	0	0	-	-
08 : Other mining and quarrying	0	0	0	0	0	-9.4%	0.0%
09 : Mining support service activities	0	0	0	0	0	-	-
10 : Manufacture of food products	400	500	400	0	-100	0.9%	-2.3%
11 : Manufacture of beverages	0	0	0	0	0	-	0.0%
12 : Manufacture of tobacco products	0	0	0	0	0	-	-
13 : Manufacture of textiles	300	200	300	-100	0	-2.6%	2.6%
14 : Manufacture of wearing apparel	0	100	0	0	0	-14.5%	-27.5%
15 : Manufacture of leather and related products	0	0	0	0	0	-	-
16 : Manufacture of wood and of products	300	300	200	-100	-100	-3.8%	-6.9%
17 : Manufacture of paper and paper products	100	100	200	100	100	16.2%	20.1%
18 : Printing and reproduction of recorded media	200	300	200	0	-100	-1.7%	-8.5%
19 : Manufacture of coke and refined petroleum products	0	0	0	0	0	-	-
20 : Manufacture of chemicals and chemical products	500	300	200	-300	-100	-11.0%	-5.3%
21 : Manufacture of basic pharmaceutical products preparations	0	0	0	0	0	-100.0%	-
22 : Manufacture of rubber and plastic products	400	400	500	100	100	1.7%	2.4%
23 : Manufacture of other non-metallic mineral products	1,400	2,300	1,500	100	-800	1.3%	-7.8%
24 : Manufacture of basic metals	200	400	200	0	-200	-1.2%	-11.3%
25 : Manufacture of fabricated metal products	1,100	1,100	800	-400	-400	-5.6%	-7.8%
26 : Manufacture of computer, electronic and optical products	100	100	100	0	-100	-0.9%	-11.7%
27 : Manufacture of electrical equipment	200	300	300	200	0	9.7%	1.6%
28 : Manufacture of machinery and equipment n.e.c.	400	400	400	0	-100	0.0%	-2.5%
29 : Manufacture of motor vehicles, trailers and semi-trailers	100	100	100	0	0	-4.4%	9.9%
30 : Manufacture of other transport equipment	0	100	100	100	0	-	5.9%
31 : Manufacture of furniture	200	100	100	-200	0	-18.0%	-6.5%
32 : Other manufacturing	300	100	100	-200	0	-12.3%	4.6%
33 : Repair and installation of machinery and equipment	100	100	100	0	0	2.6%	5.9%
35 : Electricity, gas, steam and air conditioning supply	0	100	0	0	0	-6.5%	-12.9%
36 : Water collection, treatment and supply	0	0	0	0	0	-	-
37 : Sewerage	100	200	100	0	-100	-3.5%	-14.1%
38 : Waste collection, treatment and disposal activities	200	400	400	200	0	10.2%	1.4%
39 : Remediation activities and other waste management services	0	0	100	100	100	-	-
41 : Construction of buildings	1,400	1,000	900	-500	-100	-6.6%	-2.2%
42 : Civil engineering	600	700	300	-300	-300	-8.4%	-12.9%
43 : Specialised construction activities	3,300	2,300	1,900	-1,400	-400	-7.6%	-3.6%
45 : Wholesale and retail trade and repair of motor vehicles and motorcycles	1,100	1,000	1,100	0	100	0.0%	2.4%
46 : Wholesale trade, except of motor vehicles and motorcycles	2,100	2,300	3,300	1,100	1,000	6.3%	7.6%
47 : Retail trade, except of motor vehicles and motorcycles	6,500	6,500	7,000	500	500	1.1%	1.5%
49 : Land transport and transport via pipelines	2,300	2,500	1,900	-400	-600	-2.6%	-5.6%
50 : Water transport	0	0	0	0	0	-	-
51 : Air transport	0	0	0	0	0	-	-
52 : Warehousing and support activities for transportation	2,000	2,100	2,800	800	600	4.7%	5.3%
53 : Postal and courier activities	700	600	500	-200	-100	-3.7%	-1.9%
55 : Accommodation	300	300	400	100	0	3.5%	1.5%
56 : Food and beverage service activities	3,800	3,000	3,300	-500	300	-2.0%	1.6%
58 : Publishing activities	0	400	200	200	-200	23.8%	-12.9%
59 : Motion picture, video and television programme production, sound recording and music publishing activities	100	100	100	0	0	-2.6%	0.0%
60 : Programming and broadcasting activities	0	0	0	0	0	-	-
61 : Telecommunications	400	300	200	-200	-100	-8.4%	-10.2%
62 : Computer programming, consultancy and related activities	400	500	700	300	300	8.3%	9.2%
63 : Information service activities	100	0	0	-100	0	-25.0%	-19.7%
64 : Financial service activities	900	600	400	-500	-200	-10.9%	-6.2%
65 : Insurance, reinsurance and pension funding	0	0	0	0	0	-100.0%	-100.0%
66 : Activities auxiliary to financial services and insurance activities	200	100	200	0	0	-3.3%	4.6%
68 : Real estate activities	1,000	800	1,000	100	300	0.7%	5.9%
69 : Legal and accounting activities	800	900	800	0	-100	0.0%	-2.3%
70 : Activities of head offices; management consultancy activities	700	800	500	-200	-300	-3.7%	-9.0%

ST HELENS BOROUGH EMPLOYMENT BY INDUSTRY (2-DIGIT SIC)	Total 2009	Total 2011	Total 2015	Growth 2009-2015	Growth 2011-2015	Annual growth rate 7-year 2009-2015	Annual growth rate 5-year 2011-2015
71 : Architectural and engineering activities; technical testing and analysis	800	800	700	-100	-100	-1.9%	-1.4%
72 : Scientific research and development	0	100	0	0	-100	-100.0%	-100.0%
73 : Advertising and market research	200	200	100	0	-100	-3.1%	-11.4%
74 : Other professional, scientific and technical activities	100	200	200	100	0	8.1%	3.5%
75 : Veterinary activities	100	100	200	0	100	2.8%	27.7%
77 : Rental and leasing activities	1,000	1,500	1,600	600	100	7.2%	1.6%
78 : Employment activities	1,300	600	1,800	500	1,200	4.9%	26.0%
79 : Travel agency, tour operator and other reservation service and related activities	100	100	100	0	0	3.7%	0.0%
80 : Security and investigation activities	1,100	1,300	1,900	800	600	7.6%	8.4%
81 : Services to buildings and landscape activities	800	2,300	800	0	-1,500	0.0%	-19.7%
82 : Office administrative, office support and other business support activities	300	300	700	300	300	10.4%	14.9%
84 : Public administration and defence; compulsory social security	3,800	2,800	2,800	-1,000	0	-4.3%	0.0%
85 : Education	5,500	5,000	5,000	-500	0	-1.4%	0.0%
86 : Human health activities	3,000	3,000	3,000	0	0	0.0%	0.0%
87 : Residential care activities	2,300	2,500	2,500	300	0	1.5%	0.0%
88 : Social work activities without accommodation	2,500	2,300	1,900	-600	-400	-4.0%	-3.6%
90 : Creative, arts and entertainment activities	0	0	100	0	100	21.9%	43.1%
91 : Libraries, archives, museums and other cultural activities	100	200	200	100	-100	6.0%	-5.6%
92 : Gambling and betting activities	300	300	300	100	100	3.8%	3.4%
93 : Sports activities and amusement and recreation activities	1,000	600	1,100	100	600	1.7%	15.4%
94 : Activities of membership organisations	600	700	400	-200	-300	-4.4%	-9.3%
95 : Repair of computers and personal and household goods	200	100	0	-200	0	-24.3%	-15.6%
96 : Other personal service activities	600	500	700	100	200	1.2%	5.4%
97 : Activities of households as employers of domestic personnel	0	0	0	0	0	-	-
98 : Undifferentiated goods- and services-producing activities of private households for own use	0	0	0	0	0	-	-
99 : Activities of extraterritorial organisations and bodies	0	0	0	0	0	-	-
Column Total	60,500	59,500	59,000	-1,500	-500	-0.4%	-0.2%

Source: Business Register and Employment Survey, Office for National Statistics.

FIGURE 13: COMPARING NATIONAL EMPLOYMENT GROWTH RATES WITH LCR AND LOCAL GROWTH RATES

ST HELENS BOROUGH EMPLOYMENT BY INDUSTRY (2-DIGIT SIC)	ENGLAND Annual growth rate 7-year 2009-2015	ENGLAND Annual growth rate 5-year 2011-2015	LCR Annual growth rate 7-year 2009-2015	LCR Annual growth rate 5-year 2011-2015	St Helens Annual growth rate 7-year 2009-2015	St Helens Annual growth rate 5-year 2011-2015
01 : Crop and animal production, hunting etc	0.0%	0.8%	0.0%	3.5%	1.5%	4.6%
02 : Forestry and logging	7.6%	9.0%	25.8%	38.0%	-	-
03 : Fishing and aquaculture	10.4%	9.9%	-	21.7%	-	-
05 : Mining of coal and lignite	-16.0%	-21.7%	-	-	-	-
06 : Extraction of crude petroleum and natural gas	0.8%	-2.9%	-	-	-	-
07 : Mining of metal ores	-	-	-	-	-	-
08 : Other mining and quarrying	0.5%	2.1%	8.3%	32.0%	-9.4%	0.0%
09 : Mining support service activities	1.8%	-5.0%	-	-	-	-
10 : Manufacture of food products	0.9%	0.8%	-2.2%	-1.6%	0.9%	-2.3%
11 : Manufacture of beverages	-0.6%	0.8%	-1.5%	-2.1%	-	0.0%
12 : Manufacture of tobacco products	-18.6%	-10.4%	-	-	-	-
13 : Manufacture of textiles	-1.6%	-0.2%	-0.9%	4.2%	-2.6%	2.6%
14 : Manufacture of wearing apparel	-1.1%	0.8%	-11.2%	-18.1%	-14.5%	-27.5%
15 : Manufacture of leather and related products	-1.1%	0.0%	21.9%	21.7%	-	-
16 : Manufacture of wood and of products	0.8%	3.8%	-10.2%	-13.9%	-3.8%	-6.9%
17 : Manufacture of paper and paper products	1.3%	1.3%	6.3%	5.9%	16.2%	20.1%
18 : Printing and reproduction of recorded media	-1.9%	-1.6%	-5.3%	-7.4%	-1.7%	-8.5%
19 : Manufacture of coke and refined petroleum products	-2.9%	-5.2%	-8.2%	-11.3%	-	-
20 : Manufacture of chemicals and chemical products	-2.1%	-2.1%	-4.8%	-6.7%	-11.0%	-5.3%
21 : Manufacture of basic pharmaceutical products preparations	-1.2%	-3.7%	-2.8%	0.0%	-100.0%	-
22 : Manufacture of rubber and plastic products	0.7%	1.6%	0.0%	1.0%	1.7%	2.4%
23 : Manufacture of other non-metallic mineral products	-2.6%	-2.5%	0.0%	-9.4%	1.3%	-7.8%
24 : Manufacture of basic metals	-2.0%	-2.0%	-6.5%	-11.1%	-1.2%	-11.3%
25 : Manufacture of fabricated metal products	0.0%	1.2%	-2.6%	-1.9%	-5.6%	-7.8%
26 : Manufacture of computer, electronic and optical products	-2.3%	-3.4%	1.7%	-7.1%	-0.9%	-11.7%
27 : Manufacture of electrical equipment	1.8%	-0.5%	6.8%	0.0%	9.7%	1.6%
28 : Manufacture of machinery and equipment n.e.c.	0.0%	-1.4%	-1.6%	-1.1%	0.0%	-2.5%
29 : Manufacture of motor vehicles, trailers and semi-trailers	1.9%	4.5%	7.2%	13.2%	-4.4%	9.9%
30 : Manufacture of other transport equipment	-0.8%	-0.3%	-0.8%	-1.1%	-	5.9%
31 : Manufacture of furniture	-1.1%	1.0%	-7.4%	-1.0%	-18.0%	-6.5%
32 : Other manufacturing	-2.8%	-3.7%	-13.1%	7.1%	-12.3%	4.6%
33 : Repair and installation of machinery and equipment	2.0%	4.5%	0.0%	8.4%	2.6%	5.9%
35 : Electricity, gas, steam and air conditioning supply	1.0%	1.3%	2.3%	2.1%	-6.5%	-12.9%
36 : Water collection, treatment and supply	1.6%	4.0%	-11.2%	3.7%	-	-
37 : Sewerage	4.3%	9.0%	-3.7%	-1.9%	-3.5%	-14.1%
38 : Waste collection, treatment and disposal activities	2.6%	-1.2%	6.9%	1.8%	10.2%	1.4%
39 : Remediation activities and other waste management services	10.4%	10.8%	-	-	-	-
41 : Construction of buildings	0.4%	2.6%	-6.0%	1.9%	-6.6%	-2.2%
42 : Civil engineering	-1.8%	-0.8%	-6.1%	-9.7%	-8.4%	-12.9%
43 : Specialised construction activities	-0.2%	1.6%	0.0%	0.0%	-7.6%	-3.6%
45 : Wholesale and retail trade and repair of motor vehicles and motorcycles	1.9%	1.5%	-2.0%	0.0%	0.0%	2.4%
46 : Wholesale trade, except of motor vehicles and motorcycles	0.7%	1.0%	4.2%	4.1%	6.3%	7.6%
47 : Retail trade, except of motor vehicles and motorcycles	0.2%	0.9%	0.4%	0.8%	1.1%	1.5%
49 : Land transport and transport via pipelines	0.7%	1.6%	4.0%	2.2%	-2.6%	-5.6%
50 : Water transport	2.3%	7.3%	-9.4%	-16.1%	-	-
51 : Air transport	-0.1%	1.5%	1.2%	0.0%	-	-
52 : Warehousing and support activities for transportation	4.5%	3.1%	5.7%	5.6%	4.7%	5.3%
53 : Postal and courier activities	-2.3%	0.3%	-5.6%	2.7%	-3.7%	-1.9%
55 : Accommodation	2.6%	1.2%	3.5%	1.5%	3.5%	1.5%
56 : Food and beverage service activities	1.9%	2.5%	0.8%	3.1%	-2.0%	1.6%
58 : Publishing activities	-1.3%	0.4%	3.5%	-23.1%	23.8%	-12.9%
59 : Motion picture, video and television programme production, sound recording and music publishing activities	1.7%	1.6%	-3.8%	-1.0%	-2.6%	0.0%
60 : Programming and broadcasting activities	7.9%	7.0%	15.8%	-19.7%	-	-
61 : Telecommunications	0.0%	1.5%	0.0%	1.1%	-8.4%	-10.2%
62 : Computer programming, consultancy and related activities	4.0%	3.1%	2.2%	4.9%	8.3%	9.2%
63 : Information service activities	4.4%	7.5%	6.3%	4.6%	-25.0%	-19.7%
64 : Financial service activities	-1.3%	-1.2%	-4.2%	-4.1%	-10.9%	-6.2%
65 : Insurance, reinsurance and pension funding	-0.5%	-1.5%	-5.9%	-6.7%	-100.0%	-100.0%
66 : Activities auxiliary to financial services and insurance activities	0.6%	0.1%	-3.6%	-1.1%	-3.3%	4.6%
68 : Real estate activities	1.6%	3.6%	-0.8%	1.1%	0.7%	5.9%
69 : Legal and accounting activities	3.3%	3.2%	3.9%	2.1%	0.0%	-2.3%

ST HELENS BOROUGH EMPLOYMENT BY INDUSTRY (2-DIGIT SIC)	ENGLAND Annual growth rate 7-year 2009-2015	ENGLAND Annual growth rate 5-year 2011-2015	LCR Annual growth rate 7-year 2009-2015	LCR Annual growth rate 5-year 2011-2015	St Helens Annual growth rate 7-year 2009-2015	St Helens Annual growth rate 5-year 2011-2015
70 : Activities of head offices; management consultancy activities	4.6%	6.4%	2.2%	1.5%	-3.7%	-9.0%
71 : Architectural and engineering activities; technical testing and analysis	2.8%	4.5%	0.0%	1.5%	-1.9%	-1.4%
72 : Scientific research and development	1.7%	1.8%	6.7%	-5.6%	-100.0%	-100.0%
73 : Advertising and market research	3.6%	3.9%	1.5%	0.0%	-3.1%	-11.4%
74 : Other professional, scientific and technical activities	1.9%	3.9%	4.8%	8.4%	8.1%	3.5%
75 : Veterinary activities	4.0%	4.0%	0.7%	20.1%	2.8%	27.7%
77 : Rental and leasing activities	3.2%	3.9%	7.9%	1.2%	7.2%	1.6%
78 : Employment activities	3.2%	3.6%	8.0%	4.4%	4.9%	26.0%
79 : Travel agency, tour operator and other reservation service and related activities	1.4%	0.2%	4.5%	-3.3%	3.7%	0.0%
80 : Security and investigation activities	1.0%	0.1%	9.0%	6.6%	7.6%	8.4%
81 : Services to buildings and landscape activities	2.5%	3.3%	4.8%	2.6%	0.0%	-19.7%
82 : Office administrative, office support and other business support activities	6.3%	5.2%	7.6%	5.9%	10.4%	14.9%
84 : Public administration and defence; compulsory social security	-2.6%	-2.1%	-4.3%	-4.3%	-4.3%	0.0%
85 : Education	0.7%	0.8%	-0.7%	1.1%	-1.4%	0.0%
86 : Human health activities	1.6%	2.2%	1.3%	2.0%	0.0%	0.0%
87 : Residential care activities	2.3%	0.3%	1.1%	-0.5%	1.5%	0.0%
88 : Social work activities without accommodation	0.6%	0.9%	0.0%	-1.2%	-4.0%	-3.6%
90 : Creative, arts and entertainment activities	2.4%	5.0%	8.0%	15.2%	21.9%	43.1%
91 : Libraries, archives, museums and other cultural activities	-1.3%	-0.9%	-4.0%	-6.7%	6.0%	-5.6%
92 : Gambling and betting activities	1.7%	-0.4%	1.0%	1.4%	3.8%	3.4%
93 : Sports activities and amusement and recreation activities	1.0%	1.8%	-4.0%	2.9%	1.7%	15.4%
94 : Activities of membership organisations	1.8%	1.0%	0.9%	-2.3%	-4.4%	-9.3%
95 : Repair of computers and personal and household goods	3.0%	0.9%	-4.4%	0.0%	-24.3%	-15.6%
96 : Other personal service activities	-1.3%	0.4%	0.0%	3.4%	1.2%	5.4%
97 : Activities of households as employers of domestic personnel	-	-	-	-	-	-
98 : Undifferentiated goods- and services-producing activities of private households for own use	-	-	-	-	-	-
99 : Activities of extraterritorial organisations and bodies	-	-	-	-	-	-
Column Total	1.1%	1.5%	0.4%	0.6%	-0.4%	-0.2%

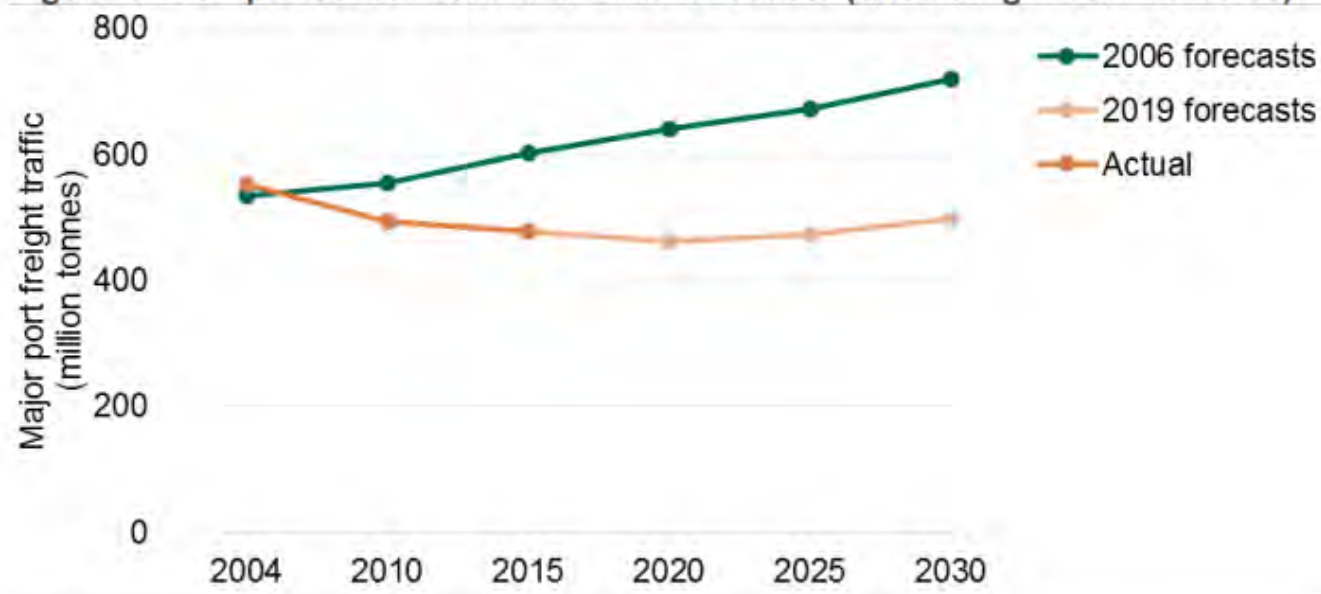
Source: Business Register and Employment Survey, Office for National Statistics.

PORT STATISTICS

- 3.21. The analysis used in the SHELMA (p122. Mersey Ports Forecasts, Peel Ports 2011) is significantly outdated. The 2006 Government forecasts for freight at ports has now been superseded by a 2019 forecast. The previous port freight traffic forecasts produced in 2006 were based on 2004 data and forecast in 5-year intervals out to 2030. As these forecasts were produced shortly before the 2008/09 drop in port freight caused by the global recession, they overestimated freight and consequently the new forecasts start at a lower level. As **Figure 14** indicates, the 2006 freight forecasts which have informed the LCR SHELMA and subsequent district Local Plans have been found to be far too optimistic in terms of total volume of port freight traffic in the UK. Therefore the updated 2019 forecasts project far lower traffic in tonnes, with an actual slight decrease from 2015 to 2020.
- 3.22. Since port traffic will drive the need for storage and distribution facilities, this lower forecast for port freight will have significant implications for land use demand, and renders the assumptions behind the LCR SHELMA and St Helens Local Plan questionable.

FIGURE 14: ACTUAL AND FORECAST PORT FREIGHT TRAFFIC

Figure 9 Comparison of 2006 and 2019 forecasts (excluding motor vehicles)



Source: Department of Transport (2019) UK Port Freight Traffic 2019 Forecasts.

- 3.23. Looking at the forecasted percentage changes, the 2006 forecasts had many cargo categories relatively flat for the period 2020-2030. These new forecasts have clearer directions for each cargo category during this period, reflecting the fact that as it is closer there is less uncertainty about the direction of travel. Some noticeable differences are the more negative forecasts for liquid bulk, coal and general cargo, in line with the large decreases which were seen 2004-2015. At the other end of the spectrum, the 2019 forecasts have a more positive forecast for other dry bulk.

FIGURE 15: COMPARING 2006 AND 2019 FORECASTS OF PORT FREIGHT TRAFFIC BY COMMODITY TYPE

Table 3 Comparison of percentage changes in 2006 and 2019 forecasts

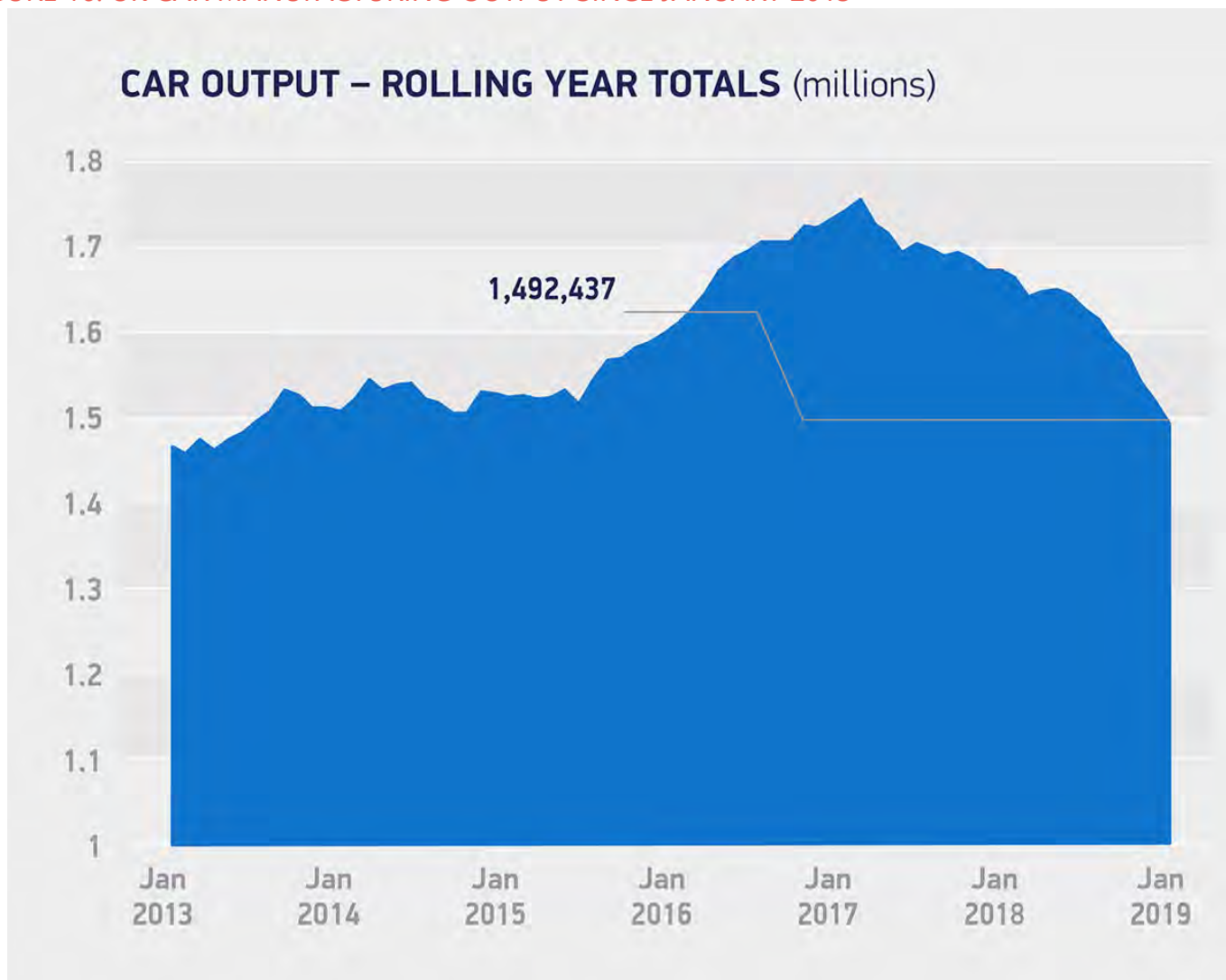
	Percentage change 2004-2015		Percentage change 2020-2030	
	2006 forecasts	Actual	2006 forecasts	2019 forecasts
Lo-Lo & Ro-Ro	45%	11%	30%	28%
Liquefied gas	320%	105%	0%	58%
Crude oil	-18%	-44%	0%	-20%
Oil products	11%	-9%	14%	-1%
Other liquid bulk	10%	-16%	0%	-16%
Liquid bulk	2%	-27%	5%	-8%
Agriproducts	-1%	2%	-2%	2%
Coal	-3%	-39%	-2%	-14%
Ores	5%	-1%	3%	1%
Other dry bulk	5%	13%	0%	10%
Dry bulk	2%	-9%	-1%	5%
Forestry products	13%	-44%	5%	-11%
Iron/steel	1%	-12%	3%	5%
Other general cargo	1%	-17%	0%	-17%
General cargo	6%	-26%	3%	-6%
Total	12%	-13%	12%	8%

Source: Department of Transport) (2019) UK Port Freight Traffic 2019 Forecasts.

VEHICLE PRODUCTION

- 3.24. In the SHELMA Consultation Draft Appendices, significant weight is given to the storage need of Trade Cars on pages 118-119. The plan suggests that trade cars represents a significant growth opportunity for the Mersey Ports and forecasts a growth of 8.11% CAGR, compared with the 0.6% for the Government forecasts. The forecasted growth is dependent on improved marine capability for car carriers and the associated storage land being available.
- 3.25. However, this outlook for the UK automotive sector is out-dated, with car manufacturing actually in decline over the past two years. In its latest analysis, the UK Society of Motor Manufacturers and Traders (SMMT) statistics on car manufacturing stated that car factories turned out 120,649 units in January 2019, down -18.2% on the previous year and marking the eighth successive month of decline. Demand dropped at home and overseas but it was the latter that fell most, with exports down -21.4% to 93,781 units. As noted in **Figure 16**, car manufacturing output has declined significantly since January 2017.

FIGURE 16: UK CAR MANUFACTURING OUTPUT SINCE JANUARY 2013



Source: UK Society of Motor Manufacturers and Traders (SMMT).

DEMAND FOR PREMISES

- 3.26. Evidence on property eligible for business rates (**Figure 17 and 18**) – shows that industrial floorspace (including warehousing) has declined significantly - by 202,000 square metres in St Helens Borough, with a significant decrease in LCR, of 404,000 square metres. **Figure 18** shows hardly any change in rateable values for industrial premises between 2005/06 and 2015/16 – this indicates either sluggish demand, or the condition of existing premises.
- 3.27. This would indicate a low level of market demand for industrial premises, or reflects on the condition of industrial premises – that so many of them have been withdrawn from market use and rateable values are static. It also points to the need to understand how old industrial premises / land has been repurposed? is it still vacant? can it be redeveloped for new industrial or office premises? This is not clear from the evidence presented as part of the draft local plan.
- 3.28. The assertion that growth in warehousing, logistics and industrial activities has been muted due to a lack of suitable premises (in the 2019 Employment Land Needs Study) may be weakened by the statistics on declining industrial floorspace and static rateable values – this demonstrates a lack of demand, rather than pent-up demand.

FIGURE 17: DATA ON PREMISES REGISTERED FOR BUSINESS RATES (HEREDITAMENTS) – TOTAL FLOOR SPACE BY TYPE OF USE IN 2005/06 AND 2015/16, THOUSANDS OF SQUARE METRES

Area	2005/06: Floorspace, thousands of square metres					2015/16: Floorspace, thousands of square metres				
	Total	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other	Total	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other
Halton UA	2,076	185	219	1,392	280	2,094	217	241	1,356	280
Knowsley	1,937	162	74	1,421	280	2,082	168	98	1,436	380
Liverpool	5,324	1,042	969	2,173	1,140	5,747	1,173	1,068	2,176	1,330
Sefton	2,611	583	259	979	790	2,535	619	262	904	750
St. Helens	2,669	296	135	1,808	430	2,525	325	144	1,606	450
Wirral	2,875	553	216	1,336	770	2,855	583	225	1,227	820
LCR	17,492	2,821	1,872	9,109	3,690	17,838	3,085	2,038	8,705	4,010
ENGLAND AND WALES	710,579	98,346	83,421	339,302	189,510	726,953	105,031	89,037	321,855	211,030

Source: Valuation Office Agency.

FIGURE 18: DATA ON PREMISES REGISTERED FOR BUSINESS RATES (HEREDITAMENTS) – CHANGE IN TOTAL FLOORSPACE BETWEEN 2005/06 AND 2015/16

Area	Total change in floorspace 2005/06 to 2015/16, thousands of square metres					Percentage change in floorspace 2005/06 to 2015/16				
	Total	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other	Total	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other
Halton UA	18	32	22	-36	0	0.9%	17.3%	10.0%	-2.6%	0.0%
Knowsley	145	6	24	15	100	7.5%	3.7%	32.4%	1.1%	35.7%
Liverpool	423	131	99	3	190	7.9%	12.6%	10.2%	0.1%	16.7%
Sefton	-76	36	3	-75	-40	-2.9%	6.2%	1.2%	-7.7%	-5.1%
St. Helens	-144	29	9	-202	20	-5.4%	9.8%	6.7%	-11.2%	4.7%
Wirral	-20	30	9	-109	50	-0.7%	5.4%	4.2%	-8.2%	6.5%
LCR	346	264	166	-404	320	2.0%	9.4%	8.9%	-4.4%	8.7%
ENGLAND AND WALES	16,374	6,685	5,616	-17,447	21,520	2.3%	6.8%	6.7%	-5.1%	11.4%

Source: Valuation Office Agency.

FIGURE 19: DATA ON AVERAGE RATEABLE VALUES OF PREMISES REGISTERED FOR BUSINESS RATES (HEREDITAMENTS)

Area	2005/06: Rateable value per square metre £				2015/16: Rateable value per square metre £			
	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other	Retail	Offices	Industrial (includes warehouses, storage, logistics)	Other
Halton UA	98	77	30	55	117	91	33	56
Knowsley	94	54	26	48	115	71	28	48
Liverpool	104	84	23	55	142	101	30	69
Sefton	111	63	25	58	120	67	29	62
St. Helens	108	66	29	50	122	78	30	55
Wirral	93	54	28	50	111	70	30	57
LCR								
ENGLAND AND WALES	128	130	33	69	151	153	37	78

Source: Valuation Office Agency.

4. The agricultural industry in St Helens

- 4.1. This section briefly provides details about the agricultural industry in St Helens Borough. The latest available data is for 2013, after which, DEFRA statistics have been provided for the local authority areas of Knowsley, St Helens and Halton combined.
- 4.2. In 2013, there were 84 agricultural holdings in St Helens Borough, comprising 7,294 hectares of agricultural land in use in 2013 – an increase on the 2010 total of 5,578 hectares. St Helen’s agricultural land represented 0.8 per cent of the North West total, and 0.08 per cent of the England total. Of this total area of land in 2013:
 - > 3,305 hectares were used for cereals production
 - > 859 hectares were used for other arable crops
 - > 610 hectares were used for fruit and vegetables
 - > 2,102 hectares were grassland in agricultural use
- 4.3. Agricultural land supported 1,124 cattle, 6,178 sheep, 1,362 pigs, and 1439 poultry in 2013. The number of cattle has declined significantly – by 47 per cent between 2010 and 2013
- 4.4. 349 people were employed in agriculture in St Helens Borough in 2013, up from 324 in 2010. This represented 1.09 per cent of agricultural employment in the North West, and 0.12 per cent of agricultural employment in England. Of these, 168 were regular workers in full time jobs, and 12 worked part-time. 102 people were employed as full-time Farmers, partners, directors and spouses in St Helens Borough in 2013, which had increased by 21 per cent since 2010. This 49 people were employed part-time as Farmers, partners, directors and spouses in St Helens Borough in agriculture in 2013.

5. Are the economic aspirations of the Liverpool City Region reasonable? Looking at the evidence

BACKGROUND

5.1. The Liverpool City Region LEP Growth Strategy (2016) sets out a series of bold ambitions and aspirations for the economy, which feed through to further LCRCAs policy documents such as the SHELMA. These in turn, inform the new draft Local Plans. The ambitions in the LEP Growth Strategy are “policy-on” forecasts – which set out a desired end point for the economy, presuming a variety of policies, interventions and investments are made to enable this. The Employment Land Needs Study– Addendum Report outlines in paragraph 2.16 the aspirations of the LEP, based upon the Oxford Economics forecasting work:

- The Liverpool City Region is forecast to have an additional 109,200 jobs by 2040 over 2016 levels in the growth scenario, compared to 34,100 additional jobs in the baseline scenario.
- St Helens is projected to have the second highest additional employment (behind only Liverpool City) in the growth scenario, with an additional 18,700 jobs projected for the borough. This compares to an additional 4,700 jobs over the same period for the baseline scenario. This took account of the large amount of potential B1/2/8 employment sites in St. Helens (see below).
- Significantly, the growth scenario assumes strong growth in the 2016-26 period before tapering off, reflecting the development activity anticipated over the coming decade.
- The growth scenario assumes a higher in-migration to the City Region.
- It is assumed that the resident employment rate would increase, compared to the baseline scenario, due to the increased availability of employment opportunities through the transformational developments.
- The largest growth sectors by employment numbers in St Helens in the growth scenario are anticipated to be warehousing and support services (+3,600 jobs) and land transport (+3,200 jobs) reflecting the key drivers of employment in the market [from the SHELMA it is noted that “data provided in spreadsheets supporting this document” but this data is not provided].
- Manufacturing in St Helens is anticipated to grow by 2,000 jobs, a significant change from the baseline scenario which assumed declining employment in this sector. This is driven by the increasing availability of strategic industrial land in St Helens in coming years that would encourage manufacturers to locate to the borough, with further logistics infrastructure and warehousing capacity allowing for improved conditions to deliver goods to markets.
- Displacement was assumed to be 33 percent (i.e. 33% of the jobs are coming from elsewhere in the City Region).

Source: BE Group for St Helens Borough Council: Employment Land Needs Study, Addendum Report, Amended January 2019, p.10.

- 5.2. What we know is that Oxford Economics produced a “transformational scenario” based upon some assumptions about build-out of employment land and designation of more employment land, that is assumed would be built-out and occupied. This “transformational scenario” seems to have driven LEP Growth Strategy ambitions, and spatial plans through the SHELMA.
- 5.3. These ‘assumptions’ used to develop the “transformational” scenario are unknown, and are not published anywhere, nor are the details of the baseline and transformational forecasts.
- 5.4. The big question is – is this objectively based need? If it is a set of economic ambitions based upon a land-use scenario derived from assumptions about build out, and additional employment land designations – then it is a supply-side policy, that follows a subjective land designation and build-out scenario - and could not be said to reflect the inherent market demand trends.
- 5.5. In my own professional experience I would argue that – historical trends plus well advanced development commitments and spending commitments (e.g. in new infrastructure) represent objectively-based need. Transformational growth and policy-on forecasts based on development aspirations, where there is no certainty of investment, build out, or occupation - are subjectively-based need.
- 5.6. The problem with “policy-on” forecasts is that, over a 25-year period, the electoral cycle can shift policies significantly and quickly make them irrelevant for planning purposes. For example, between 1996 and 2019, over 25 years (the timeline of the LCR economic strategy), England has had Training and Enterprise Councils, Government Offices, Single Regeneration Partnerships, Regional Development Agencies, City Region Partnerships, Local Enterprise Partnerships, Combined Authorities, and the Brexit vote. It has had five different UK governments (Conservative, Labour, Conservative-Lib Dem, Conservative, Conservative supported by confidence and supply agreement). Policies and agencies for local regeneration, planning, and economic development have changed frequently.

EXAMINING THE POLICY RESPONSE TO ENABLING TRANSFORMATIONAL GROWTH

- 5.7. The LCR LEP Growth Strategy is highly aspirational. The critical questions concerning this approach are:
 - I. Is there a historic growth trend to suggest that this new higher rate of economic growth is within reach?
 - II. Are there trends that indicate dynamic new industries, technologies, investment is occurring to lead to this step-change?
 - III. Does the LCR economy have the capability to attract high productivity growth industries, or develop these endogenously (from existing local resources, talent, business acumen and capital?)
 - IV. Is there a set of policies that can realistically transform the LCR economy?... are they / do they....
 - Have a coherent, realistic strategy
 - Have the resources to deliver such transformational change over the long-term?

In this section, we examine how the evidence stacks up for I. and II. The questions of III and IV are very relevant, but would require a comprehensive audit and analysis of the LCR economy and the policies and expenditure plans of all public authorities and major private businesses.

- 5.8. Examining I. – the economic growth ambitions in terms of GVA growth seem highly unrealistic – as discussed in **paragraph 3.10**. Oxford Economics's 2016 baseline projections of economic growth for the Liverpool City Region do not credibly related to historical trends, and the transformational growth scenario seems incredibly optimistic. Examining the (official) ONS statistics on economic growth (GVA growth) for Liverpool City Region and East Merseyside Nuts 2 area - for small geographies, such as local authority districts, statistics are less accurate for economic growth. As can be seen, the recent 10-year (2008-2017) annual rate of economic growth for Liverpool City Region is 0.0 per cent - zero growth per annum. The average annual 5-year (2013-2017) rate of growth is 1.0 per cent per annum. This contrasts markedly with the Oxford Economics 2016 baseline forecast of 1.9 per cent growth per annum between 2016 and 2040, and the transformational growth scenario forecast of 2.5 per cent per annum.
- 5.9. And then, as **Figures 2 to 4** show – the Oxford Economics Forecasts have consistently been much more optimistic than actual evidence about the GVA performance of the UK economy. It does not help that the 2016 forecasts are dated – and date quickly in the face of the uncertainties brought by Brexit.
- 5.10. Comparing these headline growth ambitions and forecasts to actual data trends (**Figure 20**) is interesting, as the Oxford Economic baseline and transformative forecast annual growth rates are below the trend growth rates from actual performance (from Office for National Statistics data). However, Oxford Economics, like other forecasting specialists uses a dynamic economic model – which incorporates industrial decline as well as growth. It is therefore difficult to reconcile the two as it is not known what dynamics, industry changes or productivity assumptions underline the Oxford Economics model.

FIGURE 20: COMPARING THE ECONOMIC STRATEGY AMBITIONS TO ACTUAL DATA TRENDS

	FORECAST (OXFORD ECONOMICS)		HISTORIC TRENDS (OFFICE FOR NATIONAL STATISTICS)				
	2016- 2040	Annual growth rate 2016- 2040	Trend growth rate WF jobs (Workforce Jobs Series)			Trend rate: employee jobs (BRES)	
			CAGR 18-year	CAGR 10-year	CAGR 5-year	CAGR 5-year 2011-2015	CAGR 3-year 2015-2017
LCR							
Jobs baseline	+75,100	0.20%	0.89%	0.95%	1.97%	0.6%	1.2%
Jobs transformational	+109,200	0.60%	0.89%	0.95%	1.97%	0.6%	1.2%
St Helens							
Jobs baseline	+18,700	0.98%	0.76%	0.58%	1.47%	-0.2%	1.4%
Jobs transformational	+4,700	0.27%	0.76%	0.58%	1.47%	-0.2%	1.4%

Source: Business Register and Employment Survey, Office for National Statistics.

ASSESSING THE LEP GROWTH SECTORS

5.11. The LEP Growth Sectors are:

Advanced manufacturing – particularly automotive, consumer goods, chemicals, and rail manufacturing.

Digital and creative – focussing in all sub-sectors but particularly in high performance and cognitive computing and sensor technology;

Financial and professional services – with particular strengths in private clients, maritime and business services;

Health and life sciences – focussing on precision medicine, infectious disease, children's health, independent living and eHealth;

Low carbon energy and marine energy;

Maritime and logistics;

Visitor economy – including high-value activities such as conferences and business visits; the cruise market; special sporting and other events.

Jobs data has been collated for each of these LEP Growth Sectors, apart from Low carbon energy and marine energy (as standard industrial classifications are not easily applied to this sector). As can be seen from **Figure 21** below, comparing employment growth between 2011 and 2015 shows that, compared to the national (England) average, Liverpool City Region and St Helens only perform at or above the national average in Maritime and logistics and Visitor economy. Strong growth is evident in financial and professional services for LCR, but at a rate well below the national average. In Health and life sciences, growth in LCR is at the same rate as nationally.

- 5.12. It is noted in the Local Plan documents that the largest growth sectors by employment numbers in St Helens in the growth scenario 2016-2040 are anticipated to be warehousing and support services (+3,600 jobs) and land transport (+3,200 jobs) reflecting the key drivers of employment in the market. The trend analysis would tend to bear this out.
- 5.13. The assertion that Manufacturing in St Helens is anticipated to grow by 2,000 jobs, an assumption based on the increasing availability of strategic industrial land, seems inaccurate. The overall trend from 2011 to 2015 was for a loss of 1,500 jobs, or -4.7 per cent per annum. In the LCR the loss was less, at -1.6 per cent per annum (-3,900 jobs).
- 5.14. Overall, there is the conundrum of how the 'demand-side' generation of high value added industries such as Advanced manufacturing, Digital and Creative, and Financial and professional services will take place, and therefore how the requisite demand for higher skills will come about – given that there is no evidence of a strong historical trend to suggest that this is a source of comparative advantage or an existing trend in the economic evidence.

FIGURE 21: JOBS TRENDS IN LEP "GROWTH SECTORS"

	LCR		St Helens		England	
	Jobs growth 2011-2015	% annual jobs growth 2011-2015	Jobs growth 2011-2015	% annual jobs growth 2011-2015	Jobs growth 2011-2015	% annual jobs growth 2011-2015
Advanced manufacturing	0	0.0%	-500	-4.3%	3,000	0.1%
Digital and Creative	-2,200	-2.4%	-100	-0.9%	153,500	2.8%
Financial and professional services	9,400	1.8%	300	0.6%	795,500	3.1%
Health and life sciences	6,600	2.1%	100	0.8%	188,000	2.1%
Maritime and logistics	7,200	4.1%	1,600	5.7%	120,500	1.4%
Visitor economy	5,700	2.4%	800	3.6%	211,500	2.0%
(all manufacturing)	-3,900	-1.6%	-1,500	-4.7%	-1,500	0.0%

Source: Business Register and Employment Survey, Office for National Statistics.

6. Summary of main findings and conclusions from the analysis

INTRODUCTION

- 6.1. This section presents a summary of the data, information and analysis presented in Chapters 1 to 4. There is, by implication, a degree of repetition of points previously made in order to focus on the critical issues and points of importance.
- 6.2. There is a lack of transparency over the role that the Oxford Economics Forecasts have played in determining joint (LCRCA) and borough (St Helens) planning policies. Documentation would suggest that these forecasts are ‘policy-led’ and not ‘objectively assessed’, and are, in any case out of date – along with a number of other assumptions underpinning employment land policies, including forecasts of port freight.

QUESTIONING THE “OBJECTIVELY ASSESSED NEED” THAT HAS INFORMED EMPLOYMENT LAND ALLOCATIONS

- 6.3. The Employment Land Needs Study Addendum Report, January 2019 refers to the role of economic forecasts in informing employment land policy proposals (Quoting from p.10.) “Oxford Economics prepared a jobs growth scenario forecast for the LEP which took account of transformational developments that are intended for the region in coming years. This work has informed the SHELMA. The key findings of this study suggest an additional 18,700 jobs in St Helens between 2016 and 2040, including +3,600 jobs in warehousing and support services and +3,200 jobs in land transport.
- 6.4. Further quoting from p10-11. Of the Employment Land Needs Study Addendum Report, January 2019: **“This modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focussed on logistics and warehousing schemes, including the potential Green Belt sites around Haydock, west of Omega and Parkside West and East.”**
- 6.5. What is clear is that if this statement is valid, that St Helens Borough Council itself set the criteria for the “Transformational Growth” Scenario including use of green belt land. This is a subjective policy scenario, and not an objectively based needs assessment of economic and market trends.
- 6.6. What is perhaps clear is that St Helens Borough Council have directly informed a set of economic aspirations, that have now become joint planning policy – that endorses allocating new employment sites on green belt land and assuming these are built and occupied
- 6.7. Overall, what is not clear is the detail, method and relevance of this “Transformational Growth” scenario and whether it passes the test of being Objectively Assessed Need.

THE EVIDENCE BASE IS OUT-OF-DATE

- 6.8. A number of datasets and analysis used to inform the LCR SHELMA and St Helens Borough Council Local Plan are out of date.
- 6.9. It is clear that the Oxford Economics Forecasts made in 2016 are out of date. Compared to the evidence on economic growth over recent years (2015 to 2017), they are overly optimistic in terms

of UK economic growth rates – which in this model are used to inform forecast local growth rates. For example, Oxford Economics has projected the UK rate of growth at 2.2 per cent (2016), 2.4 per cent (2017) and 2.3 per cent (2018) compared the actual out-turn, as estimated by the Office for National Statistics at 1.8 per cent (2016), 1.8 per cent (2017) and 1.4 per cent (2018). Looking Forward, in 2016, Oxford Economics forecast 2.1 per cent growth for 2019 and 2.4 per cent growth for 2020 in its baseline scenario, and 2.7 per cent and 3.7 per cent growth in 2019 and 2020 respectively in its Transformational Growth Scenario. Both scenario forecasts are very optimistic compared to recent forecasts by the Office for Budget Responsibility (in October 2019) of 1.6 per cent growth in 2019 and 1.4 per cent growth in 2020. The 2016 Baseline and Growth Scenario forecasts were originated shortly after the Brexit vote and this places them in a very uncertain context. By contrast, Oxford Economics’s 2017 projections for jobs growth are lower than the historical trend for both Workforce Jobs and employee jobs. This further undermines their perceived accuracy.

- 6.10. Research shows that the accuracy of economic forecast is significantly dependent upon the accuracy and relevance of the data they are based on. As the Office for Budget responsibility states about its own economic forecasts, which contain over 500 variables: “The first step in evaluating our economy forecasts is to understand and account for revisions and other changes to the ONS outturn data... The ONS ‘outturns’ will always be an estimate of this true underlying activity. They are revised over time as new information and new methodologies are used.” Office for Budget Responsibility, (2017) Briefing Paper No 7: Evaluating Forecast Accuracy, pp. 5. The Bank of England, in its evaluation of its own economic forecasts notes that “Errors in two year ahead GDP forecasts were positively and significantly related to data outturns [published data] known when the forecasts were made.” Bank of England (2015) Evaluating forecast performance, Independent Evaluation Office.
- 6.11. In other words – economic forecasts become out of date quickly, as new data emerges, and old datasets get revised. In particular, in times of significant economic change and uncertainty – relying on forecasts a few years old to make major policy decisions is not considered to be appropriate.
- 6.12. The UK port freight forecasts used in the LCR SHELMA are well out of date, published in 2006 and have been replaced by 2019 forecast by the Department of Transport – which project a much lower growth in freight volumes than the 2006 forecasts. In total, the 2006 forecasts projected a 12 per cent growth in UK port freight compared to an actual contraction of -13 per cent. 2006 forecasts projected a growth of 12 per cent in port freight between 2020 and 2030, compared to the 2019 forecasts projecting an 8 per cent growth rate.
- 6.13. Assumptions about the growth of UK vehicle production are also out of date, with vehicle production in steep decline since January 2017, and render the assumptions in the SHELMA and Local Plan about the growth of port freight movements and storage requirements for motor vehicles redundant.
- 6.14. The assertion that growth in warehousing, logistics and industrial activities has been muted due to a lack of suitable premises (in the 2019 Employment Land Needs Study) is also undermined by data on premises registered for business rates. Between 2005/06 and 2015/16 Industrial floorspace (including warehousing) has declined significantly - by 202,000 square metres in St Helens Borough, with a significant decrease in LCR, of 404,000 square metres. There has hardly any change in rateable values for industrial premises between 2005/06 and 2015/16. This indicates either sluggish demand, or the condition of existing premises - demonstrating a lack of demand, rather than pent-up demand.

LACK OF TRANSPARENCY IN THE EVIDENCE BASE SUPPORTING THE ST HELENS LOCAL PLAN

- 6.15. The Oxford Economics “Transformational Growth” forecasts (2016) are all quoted as being critical in informing assumptions about industry growth, jobs growth and the demand for employment land but are nowhere to be accessed. Formal enquiries made to SHBC and Liverpool City Region LEP have not resulted in the Oxford Economics forecasts or data being provided or made public. This document is not publicly available, yet underpins the LCR SHELMA, and all subsequent local plans in the Liverpool City Region. It is highly unusual to have such forecasts, material to the planning policies, not being made publicly available.
- 6.16. For other non-statutory spatial strategies and local plans, forecasts are usually made publicly available. For example:
- 6.16.1. Joint Core Strategy – Cheltenham, Tewkesbury and Gloucester
<https://www.jointcorestrategy.org/examination> – see Assessment of updated economic forecasts, Nathaniel Lichfield and Partners, April 2014
- 6.16.2. Cambridgeshire and Peterborough Joint Strategic Planning Unity -
<http://cambridgeshire.wpengine.com/document-library/> - see under “Economy and Employment (this has now been superseded by development of non-statutory spatial strategy for the GC Combined Authority area)
- 6.17. Overall this gives the impression that the LCR forecasts are a “black box” where the assumptions, and details are unknown, yet they give a very ambitious outlook for growth and for certain sectors to grow. Without the detailed evidence – the best word to describe these is “ambitions” rather than “facts”.
- 6.18. This is also further confused by the apparent land use scenarios, including the allocation of green belt land to employment use that have derived a “Transformational Growth” scenario which is driving the SHELMA and local plans. There is no way to transparently verify these forecasts and to understand their relevance today, three years after they were published.

THE FORECASTS ARE TOO OPTIMISTIC – SHOULD POLICY ASPIRATIONS DRIVE LAND USE POLICIES?

- 6.19. The economic growth ambitions of the LCR LEP and SHELMA in terms of GVA growth seem highly unrealistic. Oxford Economics's 2016 baseline projections of economic growth for the Liverpool City Region do not credibly relate to historical trends, and the transformational growth scenario seems incredibly optimistic. Examining the (official) ONS statistics on economic growth (GVA growth) for Liverpool City Region and East Merseyside Nuts 2 area - for small geographies, such as local authority districts, statistics are less accurate for economic growth. As can be seen, the recent 10-year (2008-2017) annual rate of economic growth for Liverpool City Region is 0.0 per cent - zero growth per annum. The average annual 5-year (2013-2017) rate of growth is 1.0 per cent per annum. This contrasts markedly with the Oxford Economics 2016 baseline forecast of 1.9 per cent growth per annum between 2016 and 2040, and the transformational growth scenario forecast of 2.5 per cent per annum. Even the baseline forecasts seem to significantly stretch credibility - being twice the rate of growth of the most recent 5-year period.

RO1962



Representation to the Local Plan Consultation - Sites 5EA and 6EA

Matthew Thomas

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:41

① - LPA02

② - LPA03

③ - LPA04



2 Attachments



31020 - Local Plan Letter to St Helens - 13.03.19.pdf

④ - LPA04-1

⑤ - Appendix 5
Site profiles



WIE15628-100-R-1-2-2 Supplementary Transport and Access Review.pdf

Hi,

Please find attached a letter of representation to the St Helens Borough Local Plan 2020-2035 that has been made on behalf of Canmoor Developments Ltd.

The representations specifically support the proposed allocation of sites 5EA and 6EA.

I trust that this will be taken into account in the preparation of the plan.

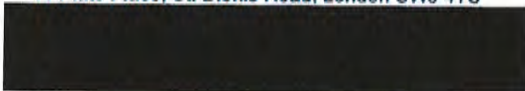
Regards,

Matthew

Matthew Thomas
MPlan MRTPI
Principal Planner

Michael Sparks Associates
Chartered Architects

11 Plato Place, St. Dionis Road, London SW6 4TU



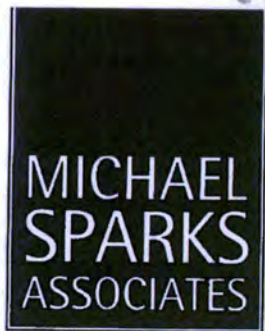
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MSA/31020/1/001

13 March 2019

Planning Policy
Local Plan
St Helens Council
Town Hall
Victoria Square
St Helens
Merseyside
WA10 1HP



CHARTERED ARCHITECTS

11 PLATO PLACE
ST. DIONIS ROAD
LONDON SW6 4TU

Dear Sir / Madam,

NEW ST HELENS LOCAL PLAN 2020-2035 SUBMISSION DRAFT CONSULTATION

Further to the Council's publication of the draft new St Helens Local Plan 2020-2035 please find representations made below on behalf of Canmoor Developments Ltd in respect of sites 5EA and 6EA that have draft allocations for employment development within the Draft Local Plan. ✓

Canmoor Developments are a pre-eminent warehouse and industrial developer with offices in London and Manchester, who have developed a significant portfolio of employment floorspace across the UK. They have made considerable investment across the north-west region to provide modern employment units for business that support the creation of jobs and are working with the respective landowners of sites 5EA and 6EA with the intention of developing these sites to add to their pipeline of warehouse and industrial development. ✓

It is the intention that these sites will be developed to provide high quality, modern employment units that meet the high levels of occupational demand in this part of the UK and it is on this basis that these representations are made. ✓

Sites 5EA and 6EA have been promoted for development as they are seen to be ideally placed to meet the demands of the occupational market, due to their location in close proximity to the Haydock Lane Industrial Estate, junctions 23 and 24 of the M6 as well as the East Lancashire Road/A580. ✓

Whilst the sites are labelled as 5EA and 6EA in the emerging Local Plan, they are referred to by Canmoor as Link 23 and Millfield Park respectively. ✓

MICHAEL SPARKS ASSOCIATES LLP

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Michael Sparks Associates LLP is a limited liability partnership, registered in England and Wales (registered number OC407290)
We use the word "partner" to refer a member of the LLP or an employee of equivalent standing.

Context for Site 6EA (Millfield Park)

A submission to the Call for Sites process was made on behalf of Canmoor in November 2017 for site 6EA to demonstrate that it was available, was suitable for redevelopment and that there were no known constraints that would otherwise preclude development of this site. These conclusions still stand and it is considered that the site can be developed to provide a mix of employment units to meet demand across the plan period. The site has flexibility to accommodate units of up to 46,000 sq m, to ensure that the demand of the occupational market can be met whether this is for small, medium or large units.

The site is in single ownership and is available for development. There are no known constraints that would preclude the development of this site for employment uses and it is available to come forward for development within the plan period.

Context for Site 5EA (Link 23)

A planning application is currently under determination for this site to secure its development for 4 employment units (ref. P/2017/0920/FUL), the largest unit proposed for this site is 13,470 sq m. This application has been subject to extensive research to assess the supply of employment land and the demand from occupiers across the St Helens area. This research has demonstrated the following:

1. That there is considerable pent up demand from industrial and warehouse occupiers in the St Helens area.
2. There is a clear, identified need for additional employment land of sufficient quality and quantity in St Helens.
3. There is a demonstrable lack of comparable sites available in the built up area boundary with a limited pipeline of new sites coming forward.
4. There are no identified technical constraints that would make the proposed development of this site unacceptable.

The application has also been supported by a number of reports to assess technical matters including flood risk, ecology and highways. These have all demonstrated that the site can be developed as proposed without giving rise to any unacceptable impacts such that an appropriate form of development can be provided on site.

The site is in single ownership and is available for development. There are no known constraints that would preclude the development of this site for employment uses and it is available to come forward for development within the plan period.

Employment Land Provision in St Helens

It has been established both through application P/2017/0920/FUL and in the evidence base that supports the emerging Local Plan, that there is a need for additional employment land of sufficient quality, quantity and variety within St Helens. The current employment land supply in

St Helens largely represents a stock of older units that do not meet modern requirements and are not in the correct location to attract investors and occupiers. As a result of this, St Helens has lost investment to neighbouring authority areas where take up of employment floorspace has been higher over the last few years. This situation is acknowledged within the Employment Land Needs Study (BE Group, 2015) and the subsequent Addendum Report, (BE Group January 2019) that forms part of the evidence base to the St Helens Local Plan, which supports our independent research that has been carried out over the last 24 months in support of the application to develop the Link 23 site.

There is therefore a lack of available land of the right quality within the existing built up area boundary of St Helens to meet demand and it is considered that areas of Green Belt need to be released to ensure that St Helens can keep pace with the need for employment units to benefit from the investment and job creation that such development will realise.

Green Belt Release

It is considered that there are no other viable opportunities to accommodate economic growth in St Helens without extending the built up area into the Green Belt. A flexible supply of land is required to ensure that larger employment units of 9,000 sq m+ can be accommodated in locations that offer good connectivity to the strategic road network, with the area around the Haydock Industrial Estate one such location. Increasing the critical mass of development at this employment hub is considered to form a sustainable form of development that will help to meet the objectives for economic development as set out within paragraph 8 of the NPPF.

GB

Whilst the allocation of sites 5EA and 6EA would result in the loss of areas of Green Belt, it will consolidate employment within Haydock and form a natural extension to the Haydock Industrial Estate which is a preferred location for occupiers. It is noted in paragraph 82 of the NPPF that planning policies and decisions should recognise and address the specific locational requirements of different sectors and the needs of the warehouse and industrial sectors are highly dependent on having good access to the motorway network, as provided at Haydock.

GB

The allocation of these sites will not have a significant effect on the remaining Green Belt as defensible boundaries can be formed and there will still be sufficient separation between settlement boundaries. The incorporation of sufficient landscape features will also allow any development of these sites to come forward in a manner that reduces any visual impact so that the development will relate well to the surrounding landscape context.

The removal of land from the Green Belt around the Haydock Lane Industrial Estate is therefore required to support the development needs of St Helens across the Local Plan period. There are no other viable alternatives to the release of land from the Green Belt and this approach is considered to be justified, consistent with national policy and effective in supporting the future economic growth of St Helens.

GB

Policy LPA02: Spatial Strategy

Policy LPA02 of the emerging Local Plan sets out the general policy approach to the provision of new development in St Helens over the period of the new Local Plan. The policy identifies that there is a specific need to accommodate growth across the logistics and warehousing sector. There is a particular demand for large scale units of over 9,000 sq m, which follows overall economic trends for larger employment units and demand in the north west is supported by investment into the port of Liverpool and Manchester Airport. The Link 23 and Millfield Park sites are both capable of accommodating units of 9,000 sq m and above and their allocation would meet an identified need.

The Council's evidence base identifies that additional land is required to meet the employment needs of St Helens across the plan period and the Council's approach to allocating sites EA5 and EA6 to meet this need is considered to be in accordance with the requirements of paragraph 23 of the NPPF that states the following:

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, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area...

The objectives of this policy are considered to be sound and in accordance with National Policy.

①

Policy LPA03: Development Principles

The principles for new development set out within Policy LPA03 are supported. This policy should be read in conjunction with draft Policies LPA02 and LPA04, as the allocation of further employment land to meet the defined need will contribute to job creation and increase opportunities for residents within St Helens., particularly those that live near to Haydock.

The objectives of this policy are considered to be sound and in accordance with National Policy.

②

Policy LPA04: A Strong and Sustainable Economy

Policy LPA04 recognises that there is a requirement for the delivery of a minimum of 215.4 hectares of land for employment development over the plan period. Our client is supportive of this assertion, and the allocations identified within the draft Policies Map, as noted in the draft policy, are similarly supported.

These allocations, including the Millfield Park and Link 23 sites, will contribute to meeting the economic needs of St Helens Borough and the Liverpool City Region over the next plan period and allow for the continued investment into St Helens to provide jobs and economic growth. As noted through the Green Belt review and evidence base that supports the preparation of the emerging plan these sites are considered suitable to be removed from the Green Belt for employment development.

③

In considering whether this amount of land should be allocated and removed from the Green Belt, the approach to preparing the Local Plan has been based on a robust methodology that takes account of local and regional economic factors as well as consideration of other alternative development scenarios.

3

The objectives of this policy are therefore considered to be sound and in accordance with National Policy.

Policy LPA04.1 Strategic Employment Sites

This policy provides additional detail to the proposed allocation of the Millfield Park site south of Liverpool Road (6EA) as a Strategic Employment Site. It is noted that any planning application for such a site must be supported by a comprehensive masterplan, which must set out details of the type of development and phasing, indicative layout and design for the whole site to secure an attractive built form and high quality landscaping.

✓

Furthermore, measures to provide good levels of accessibility by sustainable transport methods are also required, as well as a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage issues in a holistic and integrated way. The policy also requires any application to include information in respect of how energy efficiency and the use of renewable or low carbon energy will be promoted and to ensure that sufficient infrastructure is provided to serve the development. These points would generally be considered under any planning application for the site, would be in the interests of good planning and are therefore supported by our client.

4

It is further noted that any masterplan for a Strategic Employment Site should address the site specific requirements as noted in Appendix 5. In respect of the Millfield Park site, these requirements include:

6EA

- appropriate highways access via Millfield Lane and allocated 2EA site,
- the implementation of any measures required to mitigate impacts on the M6 (Junction 23) or other parts of the highway network,
- the design and layout of the development must integrate well with that of any existing or approved development within allocated 4EA and 6EA,
- the provision of effective flood management measures for the Clipsley Brook to reduce the risk of flooding downstream and enhance biodiversity.

Highways Access

It is welcomed that Appendix 5 identifies that access should be taken from Millfield Lane, however the requirement that access should also be provided from Site 2EA is not supported as it is considered that using this alternative access point is unnecessary. The requirement for access from the allocated 2EA site is inappropriate and unnecessary as an appropriate means of access is available from Millfield Lane, using either land that is public highway or within the

5

control of my client. A detailed assessment of the proposed access from Millfield Lane is included in *Appendix A*.

This detailed assessment concludes that access from Millfield Lane will provide the least stress on Junction 23 of the M6 as there are several advantages of utilising Millfield Lane, including an increase on the route choice for development traffic. The access provides a convenient route onto the northbound M6 at junction 24 and towards Wigan via the A58, thereby potentially reducing the impact of the Millfield Park development at the Haydock Island junction. ⑤

Flood Risk and Drainage Matters

The Millfield Park site is currently in agricultural use and development of this site to provide employment units will increase the impermeable area on the site so an appropriate drainage strategy will be required to ensure that any risk of flooding associated with the development does not increase the risk of flooding elsewhere. Whilst provision can be made to ensure that drainage from the site can be controlled through appropriate storage and control of surface water utilising SUDS methods, the appendix requires measures to be incorporated to the Clipsley Brook to control flooding along this watercourse. Whilst this may not be the intention of the phrasing of this part of the appendix, the wording is not particularly clear. The NPPF is clear in ensuring that any policies are written in a clear fashion, serve a clear purpose and be proportionate (paragraph 16).

It is understood that there are existing flooding issues along certain sections of the Clipsley Brook but requiring the development of the Millfield Park site to resolve any such issues is considered to be disproportionate. Measures can of course be taken to ensure that surface water run off into this watercourse is controlled from the development site, but any wholesale intervention into the watercourse is not appropriate.

An assessment of the characteristics of the Clipsley Brook along the boundary of the Millfield Park and Link 23 sites has been undertaken by Waterco, using their existing knowledge of this watercourse in their assessment. They have identified that there would be no benefit in making any alterations to the watercourse at this location for the following reasons:

The catchment area draining past the development site is small in comparison to the wider Clipsley Brook catchment (approximately 9% of the total area to Blackbrook Road), so any increase in flood storage at the upstream end of the catchment has rapidly diminishing benefits with progression downstream. Clipsley Brook has a very steep gradient past the development site, which results in limited opportunities for in-channel or floodplain storage

The extensive channel widening of Option DEV1, although realistically achievable, provides negligible reduction in downstream flood risk (less than 1% reduction in downstream peak flows). It would lead to the loss of numerous mature trees and

vegetation on both banks of the watercourse. This would be detrimental to biodiversity and would also increase the risk of channel erosion, unless significant works were undertaken as part of the widening to reinforce the vulnerable exposed river banks.

Integration of sites

The wording of Appendix 5 relating to the integration of sites is also open to interpretation and does not meet the tests for new policy provisions within the NPPF. It is assumed that this policy requires new development on proposed allocations to be considered together so that they relate well to each other.

We also note that the references to the nearby sites appears to be incorrect and that the adjacent sites should be referred to as 2EA and 5EA.

The current wording implies that they should be connected in some more meaningful way, whereas as they are identified as separate sites and will come forward at different times, on different land ownerships it is considered unreasonable to connect sites in such a manner. To provide greater clarity, it is proposed that the wording of the Appendix is amended to clarify that proposals on this site needs to relate well to existing and new development.

Proposed Changes to requirements of site 6EA

Given the above, it is therefore recommended that the requirements for site allocation 6EA in Appendix 5 are amended to the following wording:

Requirements:

- *Appropriate highway access via Millfield Lane.*
- *Implementation of any measures required to mitigate impacts on the M6 (Junction 23) or other parts of the highways network.*
- *The design and layout of the development must relate well to that of any existing or approved development within allocated sites 2EA and 5EA.*
- *Provision of effective flood management measures to ensure that the development does not increase the risk of flooding downstream of the site and to provide potential enhancements to biodiversity.*

Summary

The provisions of draft policies LPA02, LPA03 and LPA04 are supported as being necessary to provide for the future needs of St Helens in meeting the Borough's economic needs and to allow for a sustainable form of development.

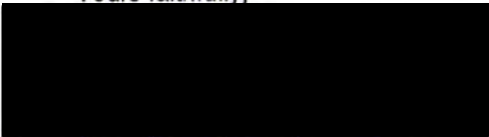
The allocation of the two sites 5EA and 6EA is also supported to meet the objectives of the proposed policy framework. There is a defined need to provide set out within the Council's evidence base for more employment land of sufficient quality to be provided in the right location to meet the current and future needs of St Helens. Given that there are no other viable

alternatives to meeting the need for employment land, the release of areas of Green Belt to provide additional employment land is also supported.

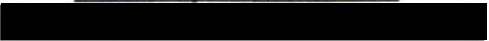
Some minor amendments to the wording of the associated text that accompanies allocation 6EA are proposed to ensure that the objectives of the NPPF are complied with. Notwithstanding these proposed revisions, the draft Local Plan is considered to be sound and in accordance with the requirements of National Policy.

I trust that these comments will be taken into account in the preparation of the Local Plan.

Yours faithfully,



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Principal Planner
Michael Sparks Associates





Supplementary Transport and Access Review

Potential Warehousing Site, Millfield Lane, Haydock, St. Helens

March 2019

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Quality Assurance – Approval Status

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS OHSAS 18001:2007)

Issue	Date	Prepared by	Checked by	Approved by
Final	13.03.19	Becky Hesketh Principal Transport Planner	John Craft Principal Transport Planner	Darren McCrohan Technical Director

Comments

Comments



Disclaimer

This report has been prepared by Waterman Infrastructure & Environment Limited, with all reasonable skill, care and diligence within the terms of the Contract with the client, incorporation of our General Terms and Condition of Business and taking account of the resources devoted to us by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

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Appendices

- A. Indicative Millfield Park Junction Arrangement
- B. Traffic Flow Diagrams
- C. TEMPRO Growth Outputs
- D. Model Outputs

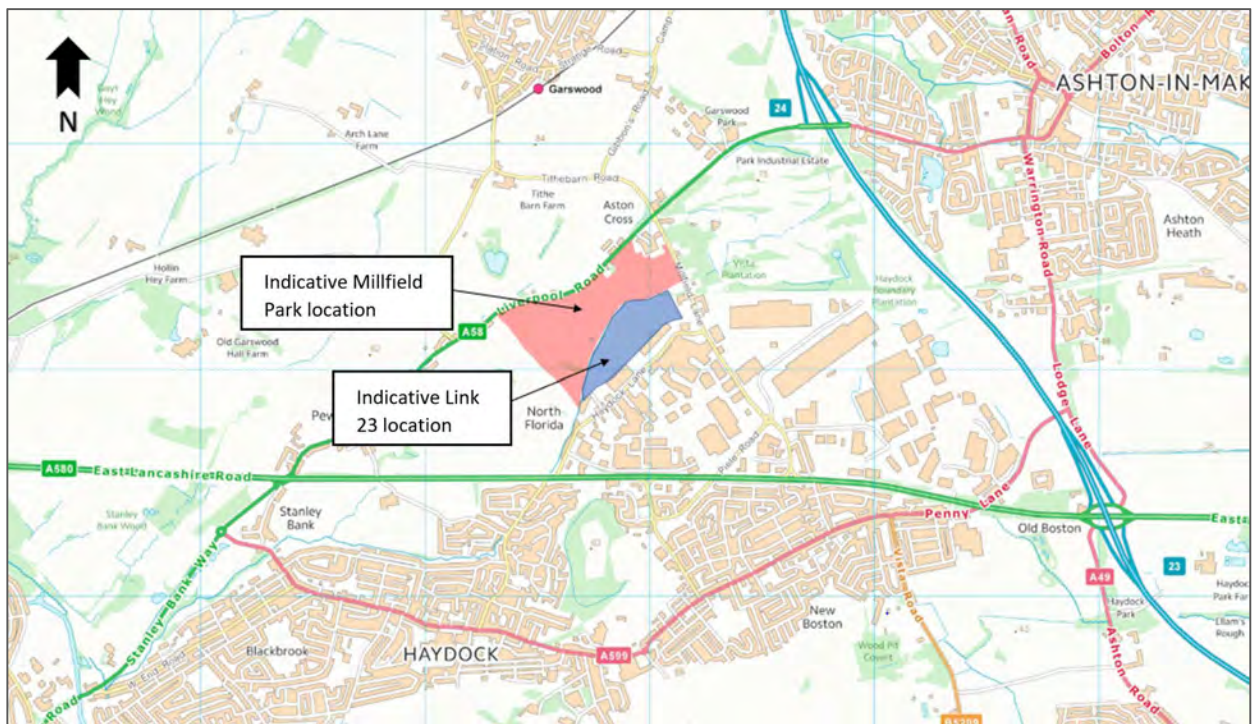
1. Introduction

- 1.1. Waterman Infrastructure & Environment has been commissioned by Canmoor Developments Ltd to consider the transport and access requirements for a warehouse and distribution facility 'Millfield Park', (incorporating land use classes B1c/B2/B8) located in Haydock, St. Helens. This work is intended to inform the masterplanning process at a high strategic level, in combination with confirming Representation to the land allocation requirements identified within the new St. Helens Borough Local Plan 2020-2035 Submission Draft.
- 1.2. This supplementary report supports the previous Transport and Access Review (Document Ref. No: WIB14205-103-R-12-2-1) submitted to St. Helens Council in October 2017 which presents an overview of the transportation issues associated with developing the Millfield Park site and in particular, provides commentary and analysis on access by both sustainable and vehicular modes of transport.
- 1.3. The site is included within the new St. Helens Borough Local Plan 2020-2035 Submission Draft, with potential land allocation identified within the Submission Draft Policies Map. The Draft Policies Map includes Millfield Park under Employment Allocation 6EA '*Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock*', which is also identified and allocated as a 'Strategic Employment Site' (Policy LPA04.1). In terms of transportation requirements, the following high-level site-specific requirements for 6EA are contained within Appendix 5 of the submission draft document, which are considered herein:
 - Appropriate highway access via Millfield Lane and allocated 2EA site (Florida Farm); and
 - Implementation of any measures required to mitigate impacts on the M6 Junction 23 or other parts of the highway network.
- 1.4. The preliminary masterplan shows a total of nine units constructed at the Millfield Park site. It is proposed the development would be accessed from a priority-controlled access junction on the Millfield Lane frontage. At this time, it is anticipated that Millfield Park would become operational in 2021.
- 1.5. For the purpose of this report, a total floorspace provision of circa 95,000sqm has been assumed to provide a robust assessment.
- 1.6. Consideration of the Millfield Park proposals includes information from the adjacent 26,975sqm 'Link 23' warehousing / distribution proposals, for which the associated Transport Assessment (Document Ref. No: WIB14205-103-R-3-2-1) scoped and submitted previously in discussion with St. Helens Council, Highways England and Wigan Council. The Link 23 site also benefits from being included within the new St. Helens Borough Local Plan Submission Draft as potential land allocation site 5EA. A full planning application for the Link 23 proposals was submitted October 2017 (Ref. No: P/2017/0920/FUL) and is currently awaiting decision.
- 1.7. Further detailed work would be required to support any future planning application for the Millfield Park site, to be undertaken in the form of a Transport Assessment (TA).
- 1.8. The remainder of this report is structured as follows:
 - Existing Situation;
 - St. Helens Local Plan Overview;
 - Access Strategy and Operational Analysis; and,
 - Summary and Conclusion.

2. Existing Situation

- 2.1. The proposed 'Millfield Park' development site is situated immediately the north of the adjacent development site 'Link 23'. Both are located to the north of the Haydock Lane Industrial Estate, near Haydock within St. Helens Metropolitan Borough Council area. The sites lie approximately 5.6km to the north east of St. Helens Town Centre and approximately 1km south west of M6 Junction 24. Figure 1 indicates the site locations in the context of the surrounding area:

Figure 1: Site Location



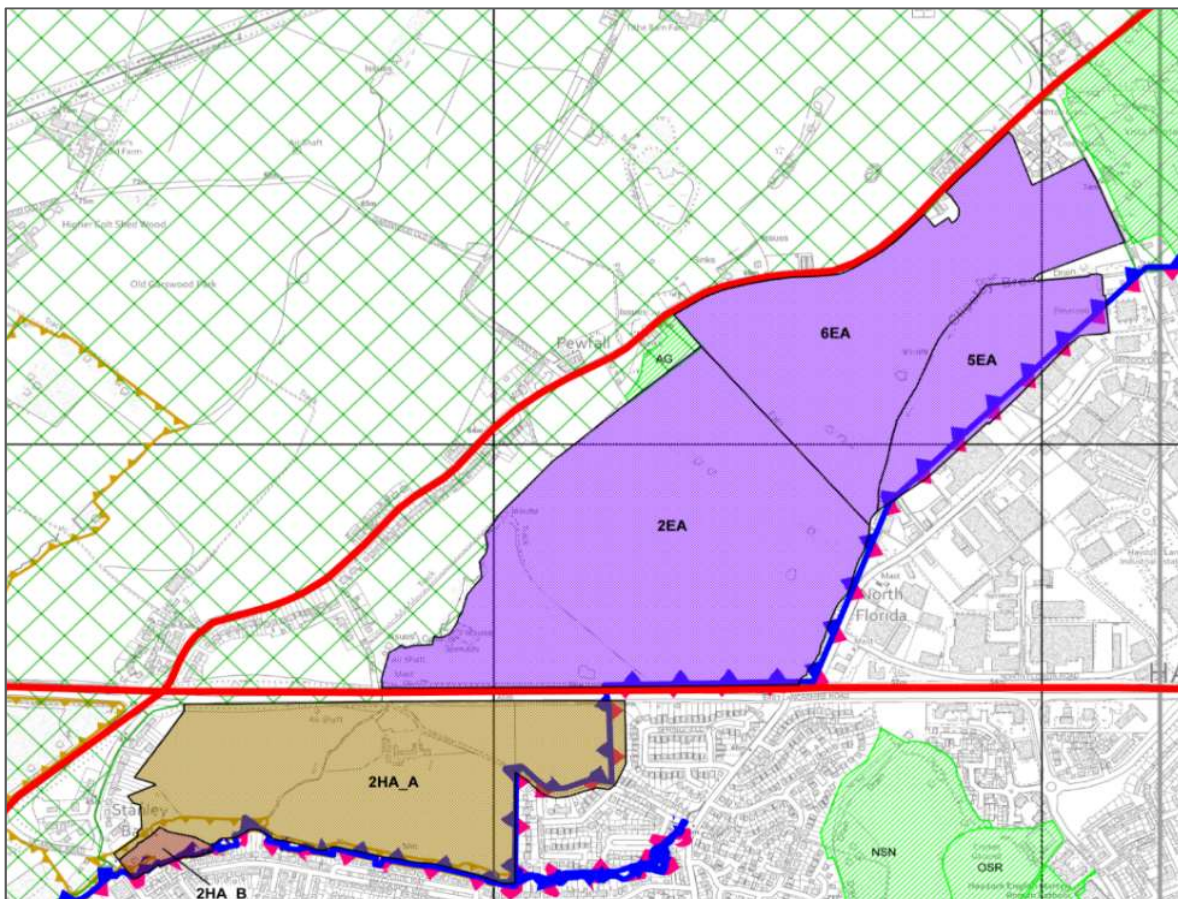
- 2.2. The Millfield Park site is currently agricultural land and is bounded by the Clipsley Brook to the south-east, the public right of way connecting Haydock Lane with the A58 Liverpool Road to the south-west, the A58 Liverpool Road and a residential development to the north-west and Millfield Lane to the north-east.
- 2.3. Millfield Lane is a single carriageway road running generally in a north / south direction that connects with the A58 Liverpool Road and the A580 East Lancashire Road. The road is subject to a 30mph speed limit in the vicinity of the site. There is an existing continuous footway along the eastern side of the road with street lighting. The western footway extends from the A58 Liverpool Road to a point near the pedestrian gate of the residential property known as 'Cross House'. A narrow footway then continues to the point where Cross House's vehicle access and the development site boundary meet. The western footway then restarts at a trailer rental company premises and continues to the south toward Haydock Lane and other destinations.
- 2.4. The A58 Liverpool Road is a single carriageway road that connects with the M6 Junction 24 and the Wigan Council area to the east and meets with the A580 East Lancashire Road to the south west of the site. The road is subject to a 50mph speed limit for approximately the first 80m of this part of the site frontage, thereafter reducing to a 40mph speed-limit. There is a continuous footway on the development frontage side (southern channel) of the road that benefits from street lighting.
- 2.5. Public transport links are available in the form of bus services; at present the nearest bus stops are located

on Millfield Lane, approximately 400m to the south of the site frontage, with others on the A58 Liverpool Road frontage. An overview of access by sustainable modes has been provided previously within the site development Transport and Access Review.

3. St. Helens Borough Local Plan 2020 - 2035

- 3.1. St. Helens Council is preparing a new Local Plan. This Plan will set how much development for housing, employment and other uses should take place in the borough. It will identify where new development should take place and set out the policies for assessing planning applications.
- 3.2. The Submission Draft document is the version that the Council wishes to adopt. Previously, the Council consulted on the Preferred Options Local Plan from December 2016 to January 2017, and representations received on that, together with other earlier consultation, has been taken into account when producing the Submission Draft.
- 3.3. Following the Submission Draft publication (17th January to 13th March 2019), together with the representations received, the Local Plan and its subsequent adoption will proceed to the Secretary of State for Examination in Public led by an independent Planning Inspector.
- 3.4. The Draft Policies Map showing land allocation extents for sites 5EA (Link 23) and 6EA (Millfield Park) is reproduced in Figure 2 below:

Figure 2: Submission Draft Policies Map (Sites 5EA and 6EA)

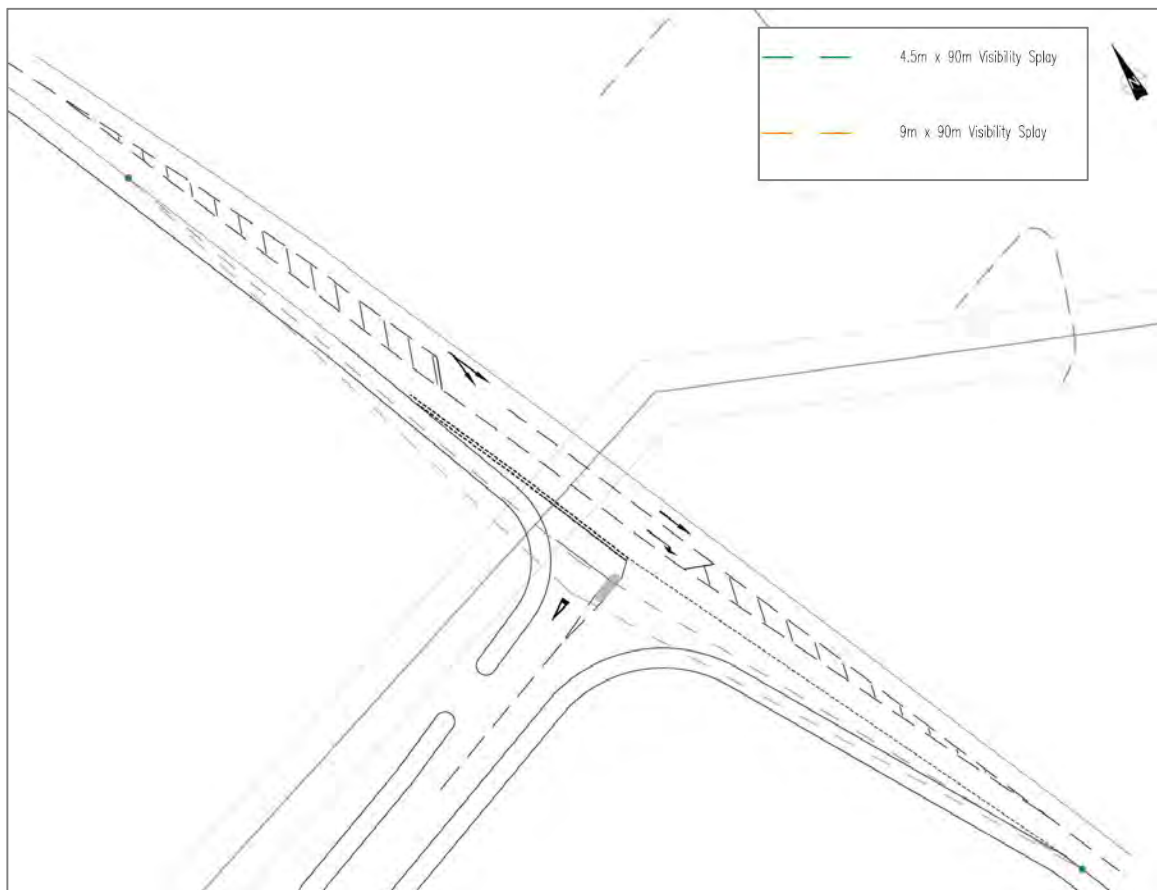


4. Access Strategy

Proposed Access Design

- 4.1. Vehicle access to the Millfield Park site will be agreed through consultation with St. Helens Council and considered as part of a Transport Assessment (TA) in support of future development at this location. From an initial review, suitable vehicular access could be accommodated via Millfield Lane by way of a priority-controlled junction.
- 4.2. There are advantages to providing access onto Millfield Road, including increasing route choice for development traffic. The potential access junction provides a convenient route onto the strategic network at M6 Junction 24 and north east towards Wigan via the A58, thereby potentially reducing the impact of development at Haydock Island (M6 Junction 23).
- 4.3. An indicative junction access layout concept on Millfield Lane is shown in Figure 3 below, with a suitably scaled plan within Appendix A.

Figure 3: Indicative Site Access on Millfield Lane



- 4.4. The junction concept design includes a 3.5-metre wide ghost island facility to allow sufficient storage of right-turn waiting traffic from Millfield Lane (north) towards the site. Adequate provision can also be made in terms of ensuring land-take within the applicant's control.
- 4.5. Additional pedestrian refuge islands could also be incorporated into the design to support existing pedestrian movements and those associated with Millfield Park and adjacent development. In order to enhance pedestrian and cycle accessibility, a 3-metre wide shared footway could be incorporated into the

site access design, to lead along the site's internal access road.

Visibility

- 4.6. The proposed access junction would be situated approximately 60-metres north of the most southerly boundary of the Millfield Park site. This has been identified as the optimum location with reference to visibility and junction design standards.
- 4.7. Figure 3 demonstrates that a visibility-splay (y-distance) of 90-metres can be achieved to the left (north) and to the right (south) based on a 9-metre x-distance. Visibility to the right / south could be maintained by incorporation of the adjacent 'paddock' land which will form part of the applicant's blue-line boundary. Although Millfield Lane is subject to a 30mph speed-limit within the vicinity of the potential site access junction, visibility has been assessed with reference to DMRB (TD42/95) 60kph / 40mph standards, and is therefore compliant and more robust than DMRB standards.
- 4.8. Visibility requirements are also stipulated within St. Helens Council document 'Street Design Guide – Highways for Adoption' (2009). Section 6 of the document requires a reduced (4.5-metre) x-distance for non-residential developments, with an y-distance of 90 / 70-metres ('subject to the status of the route') on roads subject to a 30mph speed-limit. Figure 3 shows also that visibility can be achieved in-line with this local St. Helens guidance. The achieved DMRB and St. Helens Council visibility requirements based on a 90-metre y-distance therefore provide a robust assessment which will enforce safe junction operations.

Operational Assessment

Traffic Data

- 4.9. An operational analysis of the proposed concept access junction layout has been undertaken to determine suitability for development without any material detriment to operation or safety of the adjacent highway network. Supporting traffic flow diagrams are provided within Appendix C.
- 4.10. Operational assessment has been based on data extracted from the Link 23 Transport Assessment (TA). For purposes of a robust assessment, consideration has been given to a development opening +10-year design horizon of 2031.
- 4.11. Background traffic flows along Millfield Lane, within the vicinity of the Millfield Park potential access junction have been extracted from the Link 23 TA for the weekday AM and PM peak assessment periods and are presented in Diagram 1 (Appendix B).
- 4.12. The 2018 background flows have been factored to the 2031 design year using national trip end model (NTEM) figures extracted from the computer program TEMPro. In consideration of design year traffic growth, two-way traffic flows along Millfield Lane within the vicinity of the Millfield Park potential access will be 1,012 and 1,282 vehicles in the AM and PM peak hours respectively, as shown in Diagram 2. The TEMPro traffic growth outputs are contained within Appendix C.
- 4.13. It has been assumed that the proposed Link 23 development would be fully operational in consideration of the 2031 design year assessments and these development flows have been incorporated into the assessment. Furthermore, a review of consented developments identified within the Link 23 TA demonstrates that no consented development traffic flows are anticipated to route along Millfield Lane within the vicinity of the potential Millfield Park access junction.
- 4.14. Millfield Park trip generation has been based on the trip rates utilised within the Link 23 TA, which refer to the method undertaken to support the Florida Farm North application including TRICS (Version 7.2.1) data and additional survey data associated with the Omega North development in Warrington. The peak-period trip rates taken forward are provided below, together with the resultant trip generation associated with the

forecast 95,000sqm for the Millfield Park proposals:

Table 1: Trip Rates & Millfield Park Trip Generation (95,000sqm GIA)

27,873 sqm	AM						PM					
	Arrivals		Departures		Total		Arrivals		Departures		Total	
	Car	HGV	Car	HGV	Car	HGV	Car	HGV	Car	HGV	Car	HGV
Rate	0.072	0.016	0.047	0.017	0.119	0.033	0.069	0.015	0.088	0.015	0.157	0.030
Trips	68	15	45	16	113	31	66	14	84	14	149	29

- 4.15. Table 1 highlights that the proposed development could generate (2-way) a total of 113 cars and 31 HGVs during the weekday AM peak hour and 149 cars and 29 HGVs during the equivalent PM peak. The trips have been distributed throughout the local highway network in proportion with the existing traffic demand as detailed within the Link 23 TA. Trip distribution is shown in Diagram 4 whilst trip assignment is shown in Diagram 5.
- 4.16. Total junction flows incorporating 2031 design year and Link 23 + Millfield Park development flows are presented in Diagram 6. For the purpose of operational assessments, flows have been converted to PCUs as detailed within Diagram 7.

Junction Analysis

- 4.17. The Transport Road Laboratory (TRL) computer programme PICADY has been used to analyse the capacity of the potential Millfield Park Site Access junction. The capacity of priority junctions is generally considered to be acceptable where the ratio of flow against capacity (RFC) is 0.85 or less. Within this ratio, queuing can be contained without knock-on effects to other traffic streams and the average delay per arriving vehicle is reasonable and flows are considered stable as highlighted by level of service (LOS), noted as follows:
- A = Free flow
 - B = Reasonably free flow
 - C = Stable flow
 - D = Approaching unstable flow
 - E = Unstable flow
 - F = Forced or breakdown flow
- 4.18. The Millfield Lane / Site Access junction has been modelled based on geometry derived from the initial concept design, as shown in Appendix A.
- 4.19. The detailed PICADY output is contained in Appendix D and a summary of the 2031 design year (base + Link 23 + Millfield Park) results is presented in Table 2.

Table 2: Summary PICADY Results for 2031 Design Year (Base + Link 23 + Millfield Park)

Stream	AM Peak				PM Peak			
	RFC	Delay (s)	Queue (PCU)	LOS	RFC	Delay (s)	Queue (PCU)	LOS
B - C	0.027	6.99	0.0	A	0.062	10.34	0.1	B
B - A	0.200	11.96	0.2	B	0.392	22.14	0.6	C
C - B	0.051	6.02	0.1	A	0.043	8.10	0.0	A

A=Millfield Lane (S), B= Site Access Road, C=Millfield Lane (N)

- 4.20. With the predicted increase in traffic through growth, the design year (2031) analysis shows that the junction has adequate reserve capacity. The maximum RFC is 0.392 with a queue of 0.6 PCUs at the site egress (right-turn onto Millfield Lane south) during the PM peak hour. In terms of delay, the level of service indicates stable flow for all approaches.
- 4.21. The operational assessment therefore demonstrates that a singular priority junction access on Millfield Lane would comfortably accommodate the Millfield Park proposals without detrimental operational or safety impacts on the local highway network in consideration of background traffic growth, Link 23 traffic flows and local consented developments.

Site 6EA Access Requirements

- 4.22. The site-specific access requirements outlined within the St. Helens Borough Local Plan 2020 – 2035 for Millfield Park (allocated site 6EA) requires; *“Appropriate highway access via Millfield Lane and allocated 2EA site”* (Florida Farm). However, the preliminary operational assessment undertaken above demonstrates that an additional vehicular access point to Millfield Park via the allocated 2EA site would not be necessary. Additional constraints may also be experienced should access to the Millfield Park site be required via third-party land (Florida Farm).
- 4.23. Whilst analysis undertaken within this report demonstrates that a singular vehicular access from Millfield Lane would be sufficient, this would be confirmed with further detailed analysis undertaken within a TA in support of any subsequent planning application for the site. The TA assessments will be fully scoped with St. Helens Council, Highways England and Wigan Council and will consider the finalised masterplan proposals and additional detail required to finalise the site access junction design.
- 4.24. Based on the above, it is proposed that Local Plan site specific access requirements be amended/finalised as follows;
- “Appropriate highway access via Millfield Lane or a combination with the allocated 2EA site (Florida Farm).”***
- 4.25. Determination of whether a singular point of access from Millfield Lane or an additional access via Florida Farm would be suitable would be thoroughly assessed within any subsequent TA for Millfield Park. The TA would also assess and identify any mitigation measures which may be required throughout the local highway network and Junction 23 of the M6 with reference to additional transportation requirements associated with allocated site 6EA; *“Implementation of any measures required to mitigate impacts on the M6 (Junction 23) or other parts of the highway network.”*

5. Summary & Conclusion

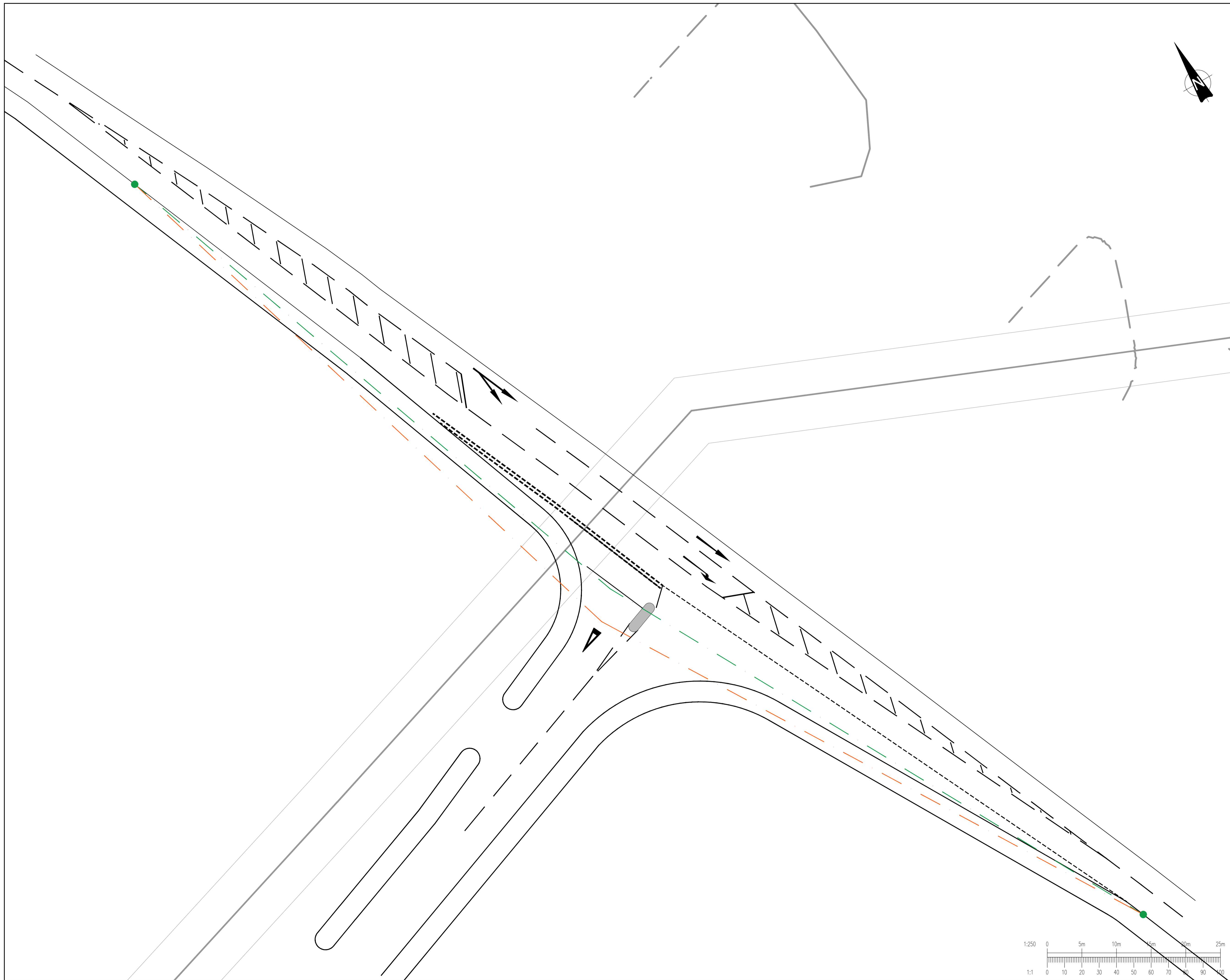
- 5.1. Waterman Infrastructure & Environment has been commissioned by Canmoor Developments Ltd to consider the transport and access requirements for a warehouse and distribution facility 'Millfield Park', (incorporating land use classes B1c/B2/B8) located in Haydock, St. Helens. This work is intended to inform the masterplanning process at a high strategic level, in combination with confirming Representation to the land allocation requirements identified within the new St. Helens Borough Local Plan 2020-2035 Submission Draft.
- 5.2. The preliminary masterplan shows a total of nine units constructed at the Millfield Park site. It is proposed the development would be accessed from a priority-controlled access junction on the Millfield Lane frontage. At this time, it is anticipated that Millfield Park would become operational in 2021.
- 5.3. The site benefits from being included within the New St. Helens Borough Local Plan 2020 – 2035 Submission Draft as potential land allocation 6EA.
- 5.4. The preliminary junction access arrangement for the Millfield Park site includes provision of 3.5-metre wide ghost island facility to allow storage of right-turn waiting traffic from Millfield Lane (north). A visibility assessment has also been undertaken which demonstrates that adequate visibility can be achieved in-line with both DMRB and St. Helens Council design standards.
- 5.5. An operational assessment has been undertaken in recognition of the preliminary junction access design and a +10-year design horizon of 2031, with assessment considering background traffic growth, consented developments and additional traffic flows associated with both Link 23 and Millfield Park.
- 5.6. Design-year operational assessment results demonstrate that the junction would operate well, indicating that additional vehicular points of access into the Millfield Park site would not be necessary as outlined in the St. Helens Borough Local Plan 2020 – 2035 site specific access requirements. It has therefore been proposed that Local Plan site specific access requirements for site 6EA be amended / finalised as follows;

“Appropriate highway access via Millfield Lane or a combination with the allocated 2EA site (Florida Farm).”
- 5.7. Determination of whether a singular point of access from Millfield Lane or an additional access via Florida Farm would be suitable would be thoroughly assessed within any subsequent TA for Millfield Park. The TA would also assess and identify any mitigation measures which may be required throughout the local highway network and Junction 23 of the M6 with reference to additional transportation requirements associated with allocated site 6EA.





APPENDICES

A. Indicative Millfield Park Junction Arrangement



KEY:

	4.5m x 90m Visibility Splay
	9m x 90m Visibility Splay

Rev	Date	Description	By
A	04.03.18	First Issue	PJ

Amendments

Project **Haydock Lane, St Helens**

Title **Haydock Lane, St Helens
General Arrangement**

Client

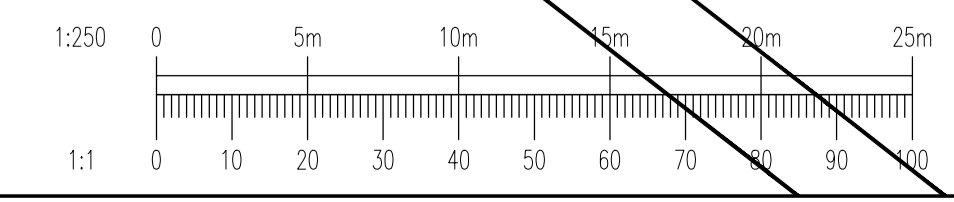


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Drawing Status **PRELIMINARY**

Designed by	PJ	Checked by	..	Project No	WIE15628
Drawn by	PJ	Date	04/03/19	Computer File No	15628-WIE-LAYOUT Masterplan Layer Details.dwg

Publisher	Zone	Category	Number	Revision
WIE	A	90	100	A01





B. Traffic Flow Diagrams

Appendices

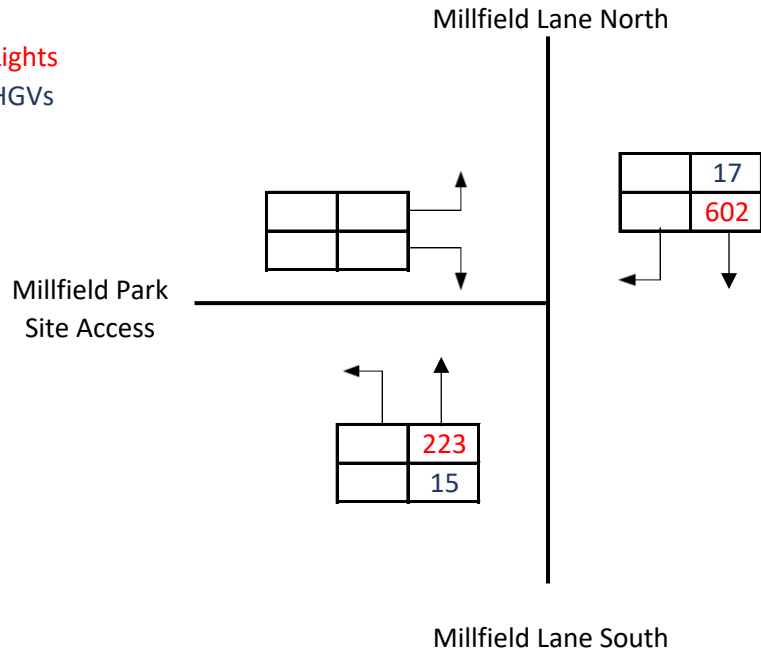
Supplementary Transport and Access Review

Document Reference: WIE15628

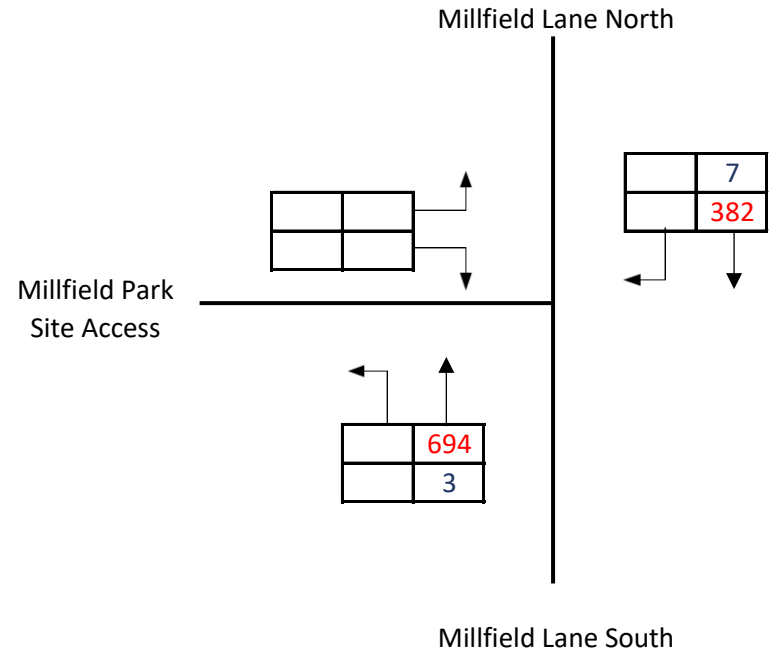
WIE15628-100-R-1-2-2

AM

Lights
HGVs



PM



* Based on Florida Farm Survey Data



WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock

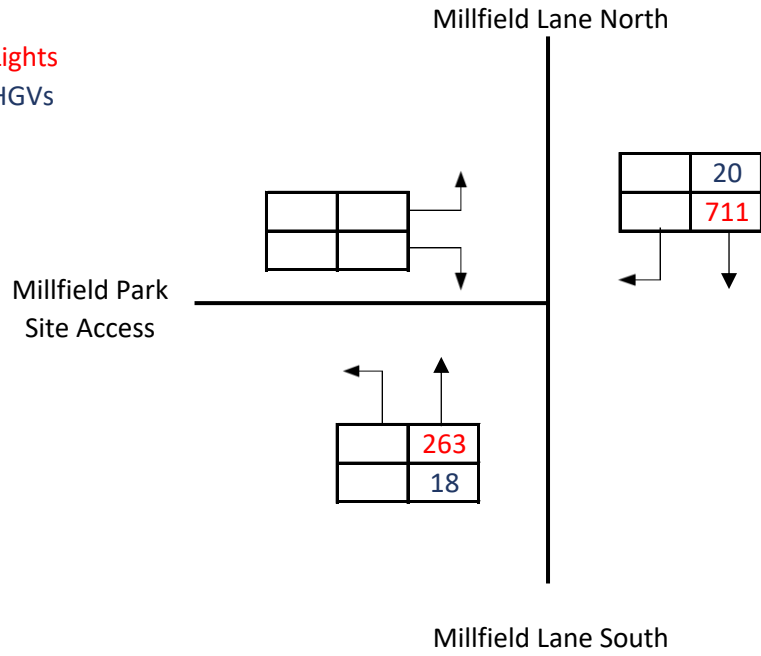
February, 2019

Diagram 1

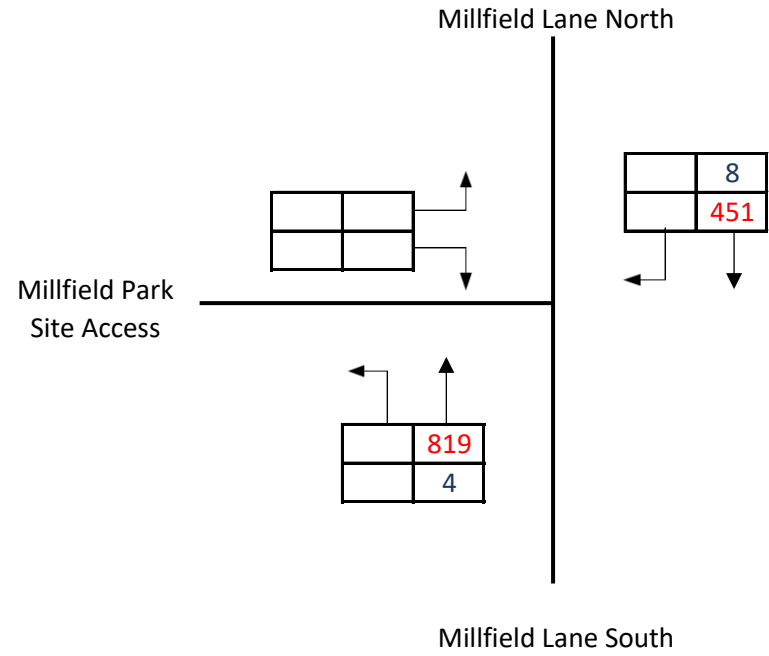
2018 Base Flows

AM

Lights
HGVs



PM



2018 - 2031
Growth Factor 1.1809

Growth Factor 1.1801

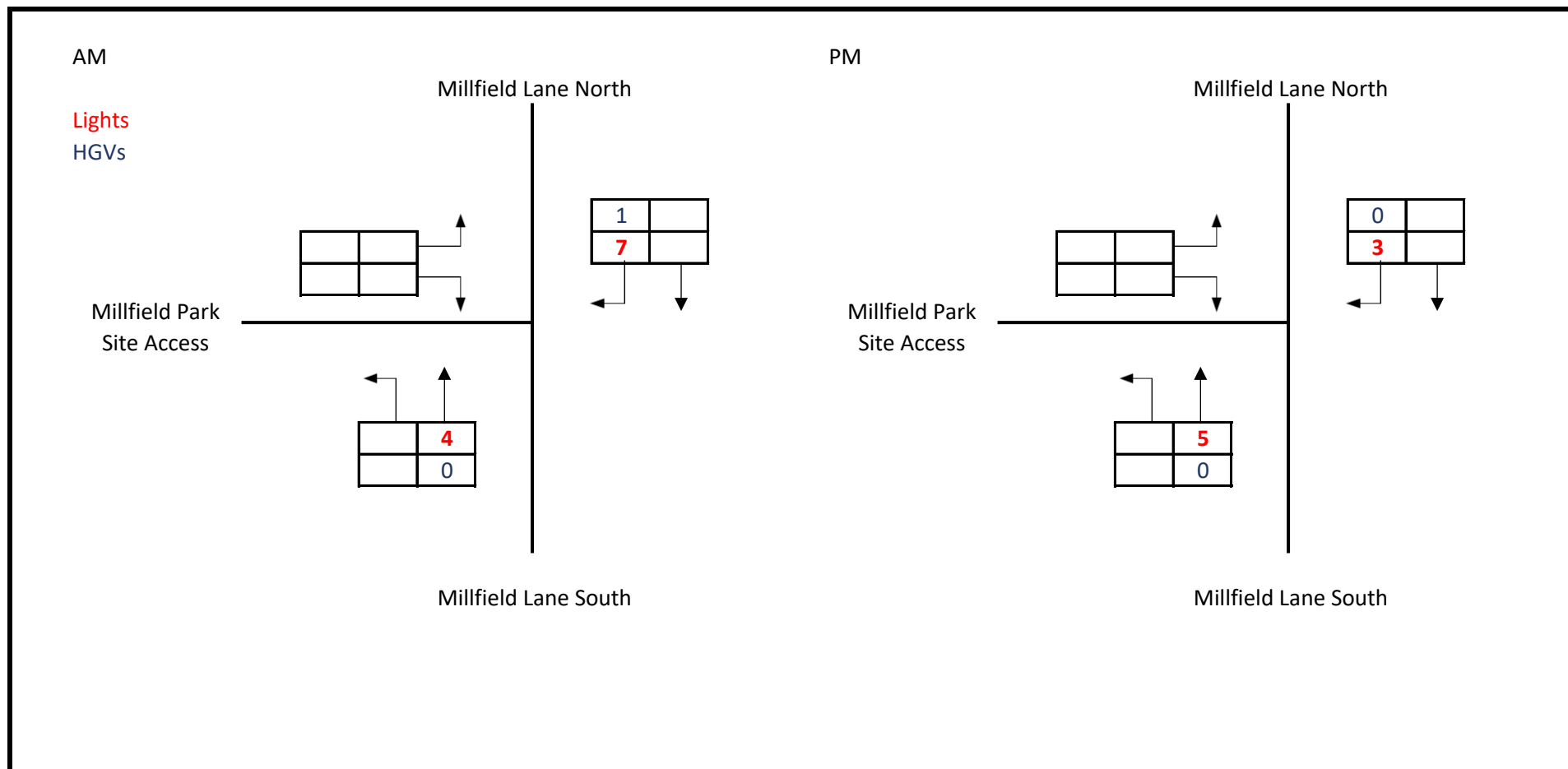


WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock

February, 2019

Diagram 2

2031 Design Year Base Flows



WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock

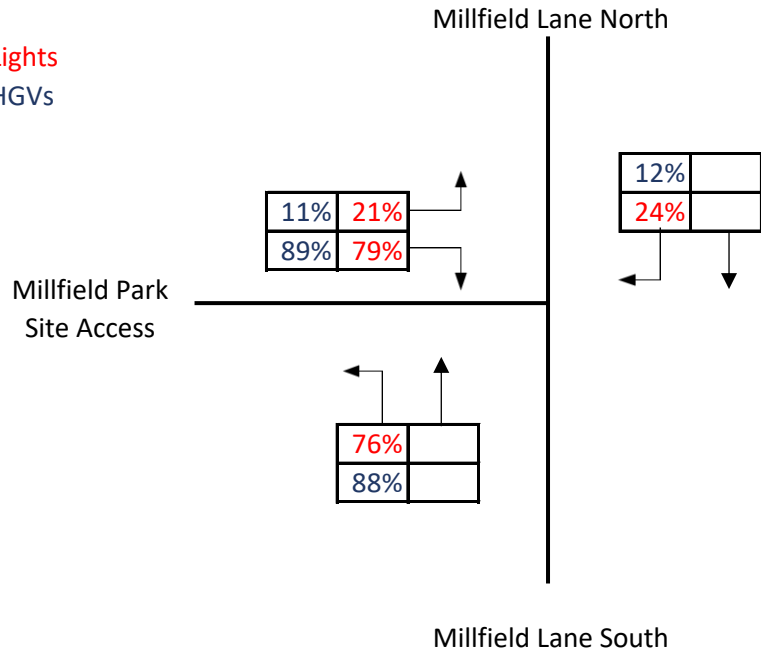
February, 2019

Diagram 3

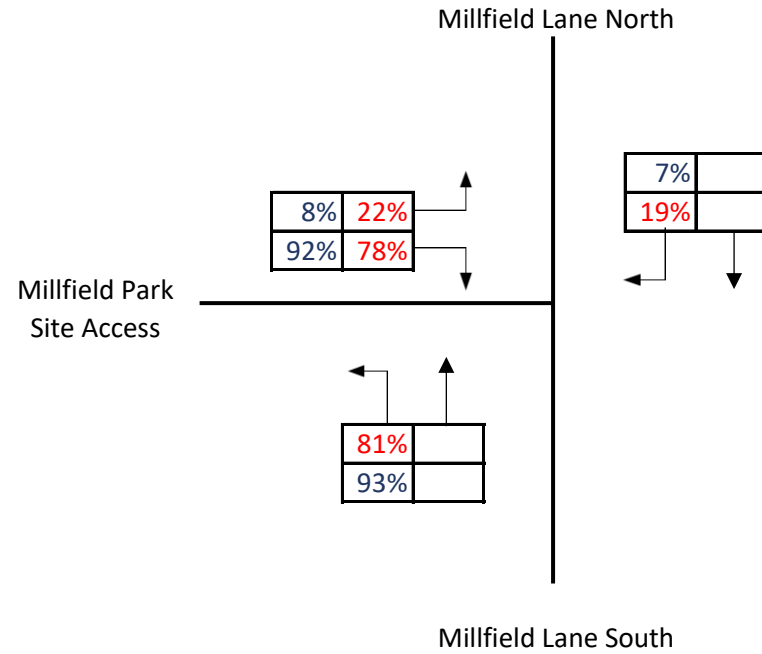
Link 23 Development Flows
(27,873sqm GIA)

AM

Lights
HGVs



PM

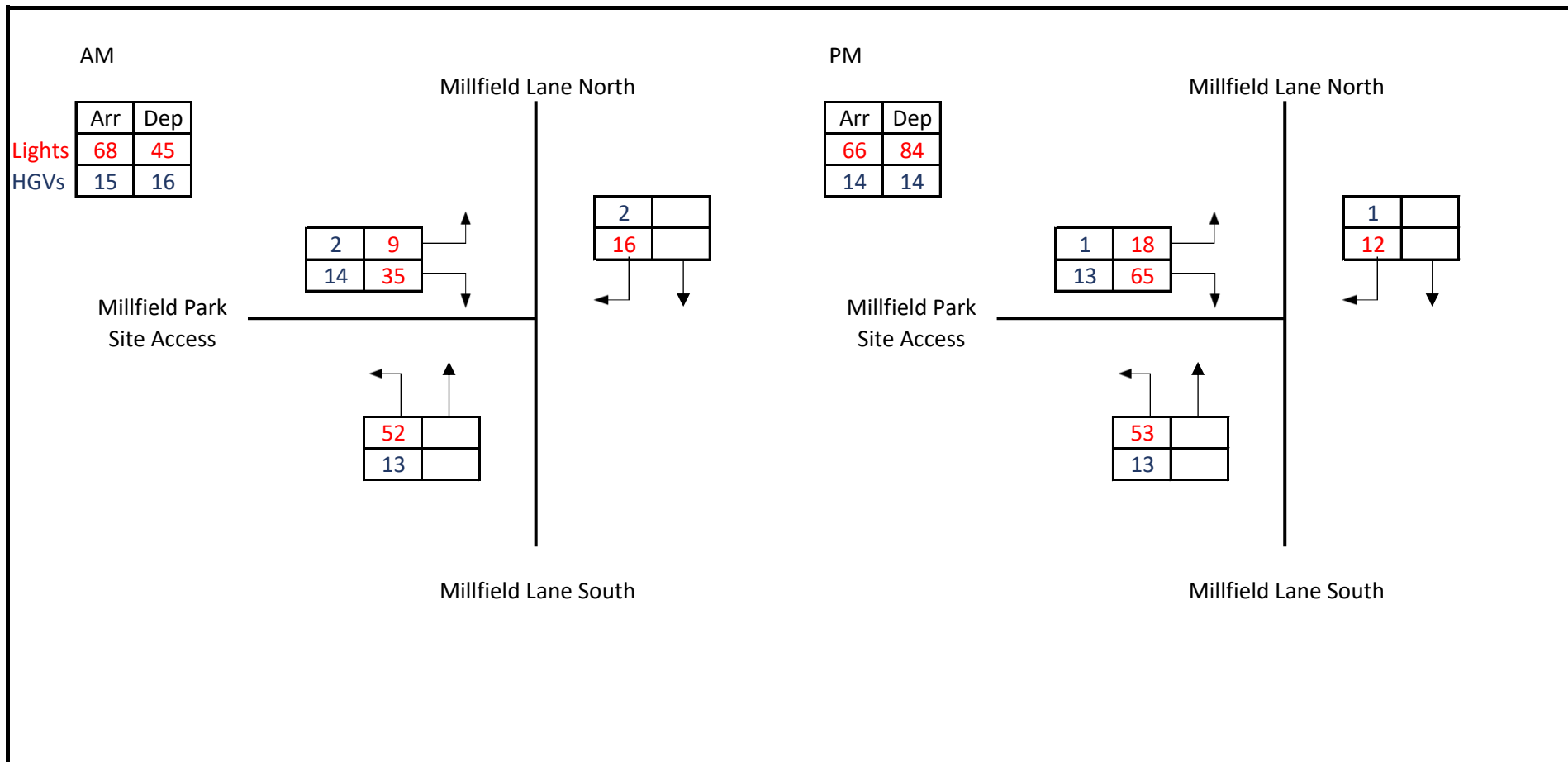


WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock

February, 2019

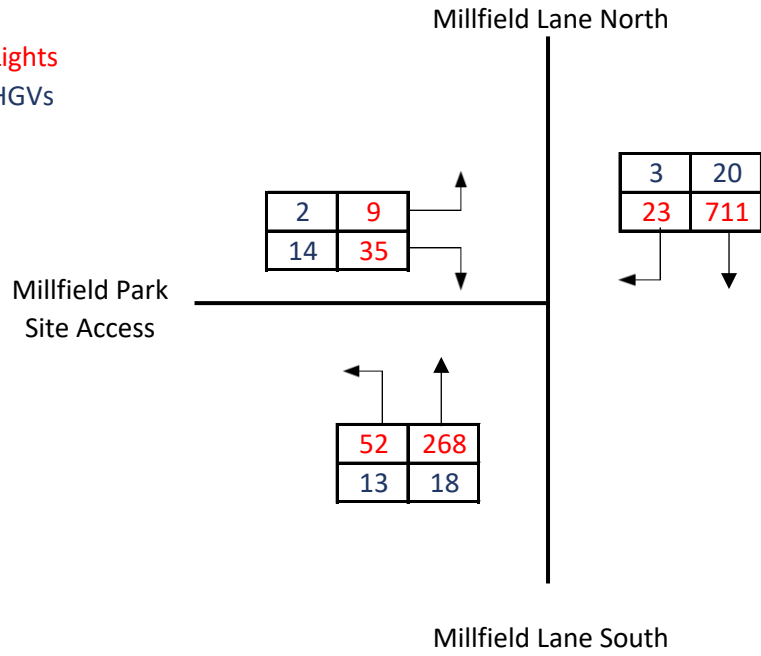
Diagram 4

Millfield Park Distribution

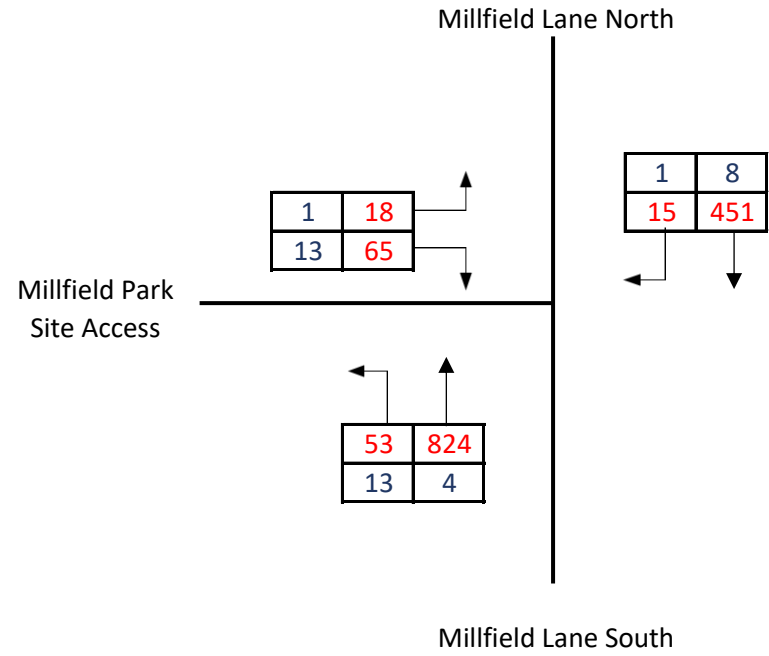


AM

Lights
HGVs



PM

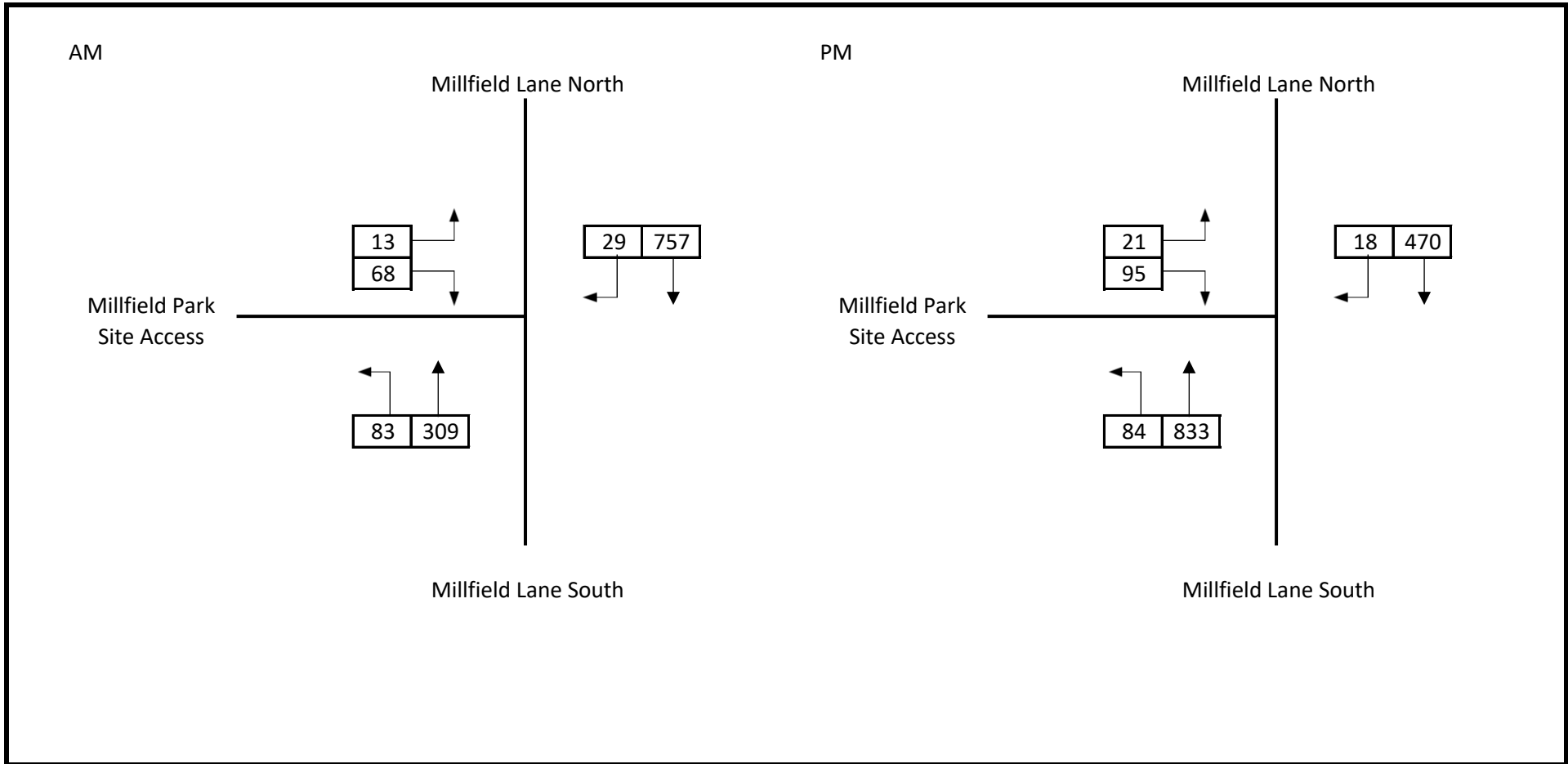


WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock

February, 2019

Diagram 6

2031 Base + Link 23 + Millfield Park (Vehicles)



WIB14205 - Potential Warehousing Site, Millfield Lane, Haydock

February, 2019

Diagram 7

2031 Base + Link 23 + Millfield Park (PCUs)



C. TEMPRO Growth Outputs

Appendices

Supplementary Transport and Access Review

Document Reference: WIE15628

WIE15628-100-R-1-2-2

TEMPro Outputs

2018 - 2031 (AM)

Data selection

Trips end selection:
 Trips end by time period selection:
 Select time period:
 Weekday AM peak period (0700 - 0900)

 Trips end type:
 Production/Attraction
 Origin/Destination

Results

Select data type:
 Growth factors
 Future year minus base year
 Base year data
 Future year data
 *Detailed results indicate that there is a lower level of confidence in data presented at the road level than when aggregated to higher geographical levels.

Area Description	Name	Origin	All Purposes	Destruction
#0200142P	St. Helens 005		1.079	1.000

STM Traffic Growth Calculations

1. Select STM Database:

STM Database Description	From	To
STM AF09 Database	2003	2035
STM AF10 Database	2015	2035

2. Select Areas to make up the geographic region:
 St. Helens 005 (0200142)

3. Select area type:
 Urban
 Rural
 All

4. Select road type:
 Motorway
 Trunk
 Primary
 Other
 All

5. Select which area it serves:
 Region
 England

Results

Level	Area	Local Growth Figure
#0200142	St. Helens 005	1.009

2018 - 2031 (PM)

Data selection

Trips end selection:
 Trips end by time period selection:
 Select time period:
 Weekday PM peak period (1600 - 1800)

 Trips end type:
 Production/Attraction
 Origin/Destination

Results

Select data type:
 Growth factors
 Future year minus base year
 Base year data
 Future year data
 *Detailed results indicate that there is a lower level of confidence in data presented at the road level than when aggregated to higher geographical levels.

Area Description	Name	Origin	All Purposes	Destruction
#0200142P	St. Helens 005		1.096	1.000

STM Traffic Growth Calculations

1. Select STM Database:

STM Database Description	From	To
STM AF09 Database	2003	2035
STM AF10 Database	2015	2035

2. Select Areas to make up the geographic region:
 St. Helens 005 (0200142)

3. Select area type:
 Urban
 Rural
 All

4. Select road type:
 Motorway
 Trunk
 Primary
 Other
 All

5. Select which area it serves:
 Region
 England

Results

Level	Area	Local Growth Figure
#0200142	St. Helens 005	1.001



D. Model Outputs

Appendices

Supplementary Transport and Access Review

Document Reference: WIE15628

WIE15628-100-R-1-2-2

Junctions 9
PICADY 9 - Priority Intersection Module
Version: 9.5.0.6896 © Copyright TRL Limited, 2018
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Filename: millfield_site access.j9

Path: \\S-GW\wiel\Projects\WIE15628_Haydock Lane St Helens\100\5_Technical\Transportation\Modelling

Report generation date: 06/03/2019 17:11:07

- »(Default Analysis Set) - 2031 Design + P1 + Dev, AM
- »(Default Analysis Set) - 2031 Design + P1 + Dev, PM

Summary of junction performance

	AM		PM	
	Queue (PCU)	RFC	Queue (PCU)	RFC
A1 - 2031 Design + P1 + Dev				
Stream B-C	0.0	0.03	0.1	0.06
Stream B-A	0.2	0.20	0.6	0.39
Stream C-B	0.1	0.05	0.0	0.04

There are warnings associated with one or more model runs - see the 'Data Errors and Warnings' tables for each Analysis or Demand Set.

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

File summary

File Description

Title	(untitled)
Location	
Site number	
Date	27/01/2017
Version	
Status	(new file)
Identifier	
Client	
Jobnumber	
Enumerator	GWJRC
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	PCU	PCU	perHour	s	-Min	perMin

Analysis Options

Vehicle length (m)	Calculate Queue Percentiles	Calculate detailed queueing delay	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
5.75				0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D1	2031 Design + P1 + Dev	AM	ONE HOUR	08:00	09:30	15	✓
D2	2031 Design + P1 + Dev	PM	ONE HOUR	16:45	18:15	15	✓

Analysis Set Details

ID	Name	Include in report	Network flow scaling factor (%)	Network capacity scaling factor (%)
A1	(Default Analysis Set)	✓	100.000	100.000

(Default Analysis Set) - 2031 Design + P1 + Dev, AM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Vehicle Mix		HV% is zero for all movements / time segments. Vehicle Mix matrix should be completed whether working in PCUs or Vehs. If HV% at the junction is genuinely zero, please ignore this warning.

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	Millfield Lane / Site Access	T-Junction	Two-way		0.86	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Arms

Arms

Arm	Name	Description	Arm type
A	Millfield Lane (S)		Major
B	Site Access		Minor
C	Millfield Lane (N)		Major

Major Arm Geometry

Arm	Width of carriageway (m)	Has kerbed central reserve	Has right turn bay	Width for right turn (m)	Visibility for right turn (m)	Blocks?	Blocking queue (PCU)
C	6.40		✓	3.50	150.0		-

Geometries for Arm C are measured opposite Arm B. Geometries for Arm A (if relevant) are measured opposite Arm D.

Minor Arm Geometry

Arm	Minor arm type	Width at give-way (m)	Width at 5m (m)	Width at 10m (m)	Width at 15m (m)	Width at 20m (m)	Estimate flare length	Flare length (PCU)	Visibility to left (m)	Visibility to right (m)
B	One lane plus flare	10.00	9.50	6.50	5.70	5.50	✓	3.00	90	90

Slope / Intercept / Capacity

Priority Intersection Slopes and Intercepts

Junction	Stream	Intercept (PCU/hr)	Slope for AB	Slope for AC	Slope for C-A	Slope for C-B
1	B-A	656	0.117	0.297	0.187	0.424
1	B-C	651	0.098	0.248	-	-
1	C-B	754	0.287	0.287	-	-

The slopes and intercepts shown above do NOT include any corrections or adjustments.

Streams may be combined, in which case capacity will be adjusted.

Values are shown for the first time segment only; they may differ for subsequent time segments.

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D1	2031 Design + P1 + Dev	AM	ONE HOUR	08:00	09:30	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)
✓	✓	HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
A		ONE HOUR	✓	392	100.000
B		ONE HOUR	✓	81	100.000
C		ONE HOUR	✓	786	100.000

Origin-Destination Data

Demand (PCU/hr)

	To			
	A	B	C	
From	A	0	83	309
	B	68	0	13
	C	757	29	0

Vehicle Mix

Heavy Vehicle Percentages

	To			
	A	B	C	
From	A	0	0	0
	B	0	0	0
	C	0	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS	Average Demand (PCU/hr)	Total Junction Arrivals (PCU)
B-C	0.03	6.99	0.0	A	12	18
B-A	0.20	11.99	0.2	B	62	94
C-A					695	1042
C-B	0.05	6.01	0.1	A	27	40
AB					76	114
AC					284	425

Main Results for each time segment

08:00 - 08:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	10	2	571	0.017	10	0.0	0.0	6.417	A
B-A	51	13	464	0.110	51	0.0	0.1	8.695	A
C-A	570	142			570				
C-B	22	5	670	0.033	22	0.0	0.0	5.555	A
A-B	62	16			62				
A-C	233	58			233				

08:15 - 08:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	12	3	554	0.021	12	0.0	0.0	6.641	A
B-A	61	15	427	0.143	61	0.1	0.2	9.837	A
C-A	681	170			681				
C-B	26	7	653	0.040	26	0.0	0.0	5.740	A
A-B	75	19			75				
A-C	278	69			278				

08:30 - 08:45

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	14	4	529	0.027	14	0.0	0.0	6.992	A
B-A	75	19	375	0.200	75	0.2	0.2	11.959	B
C-A	833	208			833				
C-B	32	8	630	0.051	32	0.0	0.1	6.014	A
A-B	91	23			91				
A-C	340	85			340				

08:45 - 09:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	14	4	529	0.027	14	0.0	0.0	6.994	A
B-A	75	19	375	0.200	75	0.2	0.2	11.985	B
C-A	833	208			833				
C-B	32	8	630	0.051	32	0.1	0.1	6.014	A
A-B	91	23			91				
A-C	340	85			340				

09:00 - 09:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	12	3	553	0.021	12	0.0	0.0	6.645	A
B-A	61	15	427	0.143	61	0.2	0.2	9.863	A
C-A	681	170			681				
C-B	26	7	653	0.040	26	0.1	0.0	5.743	A
A-B	75	19			75				
A-C	278	69			278				

09:15 - 09:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	10	2	570	0.017	10	0.0	0.0	6.421	A
B-A	51	13	464	0.110	51	0.2	0.1	8.726	A
C-A	570	142			570				
C-B	22	5	670	0.033	22	0.0	0.0	5.557	A
A-B	62	16			62				
A-C	233	58			233				

(Default Analysis Set) - 2031 Design + P1 + Dev, PM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Vehicle Mix		HV% is zero for all movements / time segments. Vehicle Mix matrix should be completed whether working in PCUs or Vehs. If HV% at the junction is genuinely zero, please ignore this warning.

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	Millfield Lane / Site Access	T-Junction	Two-way		1.62	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D2	2031 Design + P1 + Dev	PM	ONE HOUR	16:45	18:15	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)
✓	✓	HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
A		ONE HOUR	✓	917	100.000
B		ONE HOUR	✓	116	100.000
C		ONE HOUR	✓	488	100.000

Origin-Destination Data

Demand (PCU/hr)

		To		
		A	B	C
From	A	0	84	833
	B	95	0	21
	C	470	18	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		A	B	C
From	A	0	0	0
	B	0	0	0
	C	0	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS	Average Demand (PCU/hr)	Total Junction Arrivals (PCU)
B-C	0.06	10.34	0.1	B	19	29
B-A	0.39	22.14	0.6	C	87	131
C-A					431	647
C-B	0.04	8.10	0.0	A	17	25
A-B					77	116
A-C					764	1147

Main Results for each time segment

16:45 - 17:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	16	4	469	0.034	16	0.0	0.0	7.943	A
B-A	72	18	389	0.184	71	0.0	0.2	11.264	B
C-A	354	88			354				
C-B	14	3	556	0.024	13	0.0	0.0	6.634	A
A-B	63	16			63				
A-C	627	157			627				

17:00 - 17:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	19	5	430	0.044	19	0.0	0.0	8.752	A
B-A	85	21	338	0.253	85	0.2	0.3	14.204	B
C-A	423	106			423				
C-B	16	4	518	0.031	16	0.0	0.0	7.178	A
A-B	76	19			76				
A-C	749	187			749				

17:15 - 17:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	23	6	372	0.062	23	0.0	0.1	10.317	B
B-A	105	26	267	0.392	103	0.3	0.6	21.843	C
C-A	517	129			517				
C-B	20	5	464	0.043	20	0.0	0.0	8.095	A
A-B	92	23			92				
A-C	917	229			917				

17:30 - 17:45

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	23	6	371	0.062	23	0.1	0.1	10.343	B
B-A	105	26	267	0.392	105	0.6	0.6	22.142	C
C-A	517	129			517				
C-B	20	5	464	0.043	20	0.0	0.0	8.097	A
A-B	92	23			92				
A-C	917	229			917				

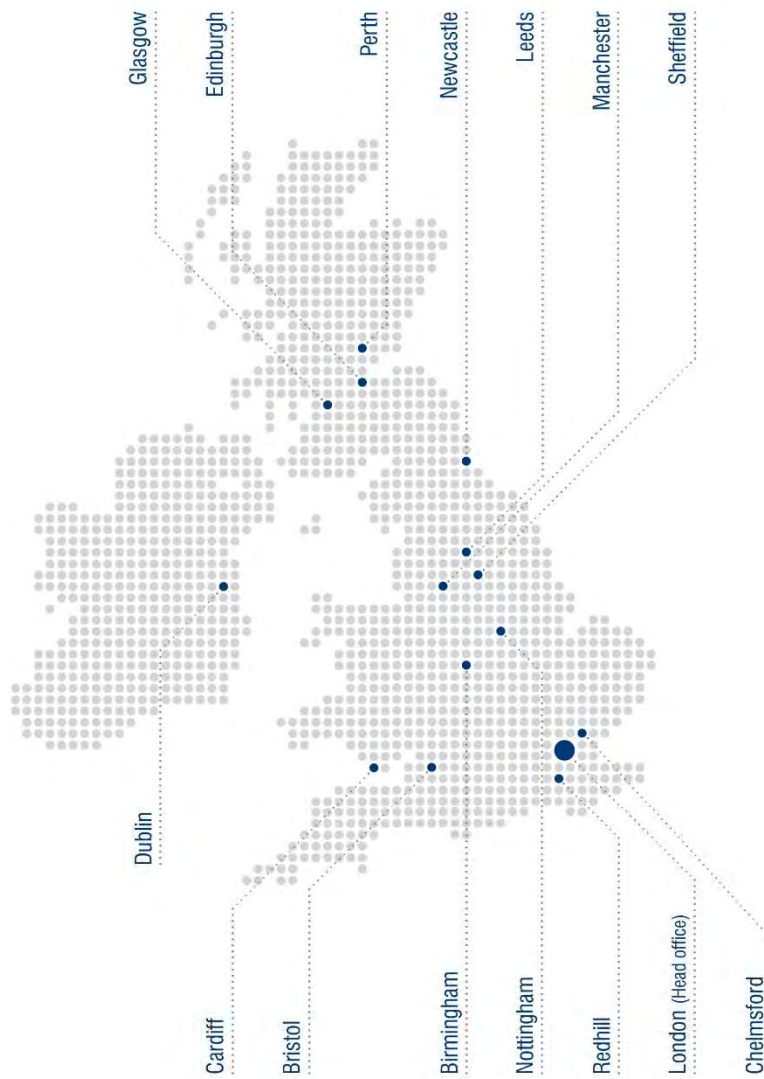
17:45 - 18:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	19	5	429	0.044	19	0.1	0.0	8.773	A
B-A	85	21	338	0.253	87	0.6	0.3	14.382	B
C-A	423	106			423				
C-B	16	4	518	0.031	16	0.0	0.0	7.183	A
AB	76	19			76				
AC	749	187			749				

18:00 - 18:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	16	4	468	0.034	16	0.0	0.0	7.959	A
B-A	72	18	389	0.184	72	0.3	0.2	11.364	B
C-A	354	88			354				
C-B	14	3	556	0.024	14	0.0	0.0	6.635	A
AB	63	16			63				
AC	627	157			627				

UK and Ireland Office Locations



RO1963



St Helens Local Plan - Submission Draft Representations

[REDACTED]

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:42

[REDACTED]

2 Attachments



St Helens Local Plan Submission Reprs 130319_Final.pdf



Representation Form_CBRE.pdf

Good Afternoon,

Please find attached representations to the St Helens Local Plan Submission Draft Consultation by CBRE Ltd on behalf of iSec.

The following documents have been submitted:

- Local Plan Representation Form
- Letter with detailed response to Policy LPA10

I can confirm that CBRE wish to participate in the Examination in Public.

I would be grateful if you could confirm receipt of this email and attached representations.

Kind regards

Grace

Grace Allen MRTPI | Senior Planner
Planning & Development
CBRE Ltd
55 Temple Row | Birmingham | B2 5LS

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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;

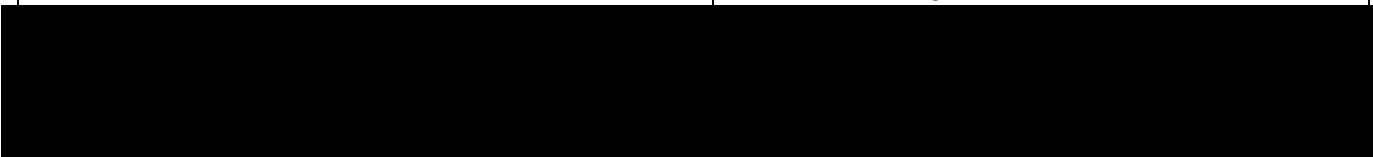
Part A – Personal Details

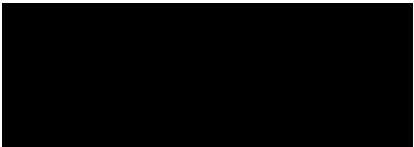
Part B – Your Representation(s).

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: C/O Agent	First name: Richard
Last Name:	Last Name: Brown
Organisation/company: iSec	Organisation/company: CBRE Ltd
Address:	Address: 55 Temple Row Birmingham
Postcode:	Postcode: B2 5LS



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 (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)

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	LPA10	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:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input 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 unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input 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

Whilst our client generally supports the policy and considers that it is sound, a minor modification is suggested which will ensure the policy is fully justified and consistent with national policy. Please see enclosed letter detailing our response.

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 enclosed letter detailing our proposed modification and justification.

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:

To ensure that policy LPA10 is the most appropriate and flexible for rail-served, and other, employment related development. Land at Parkside East is recognised as being critically important to the growth of St Helens and the wider Liverpool City Region and therefore is essential that the policy is clear and enables development of the whole site within the plan period.

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.**

Development Plans
St Helens Council
Town Hall Annexe
Victoria Square
St Helens
Merseyside
WA10 1HP

13th March 2019

Dear Sir/Madam,

ST HELENS BOROUGH LOCAL PLAN (2020-2035): SUBMISSION DRAFT CONSULTATION RESPONSE ON BEHALF OF iSec

INTRODUCTION

These representations are submitted by CBRE in respect land at Parkside East, specifically draft Policy LPA10. CBRE act on behalf of iSec who have a potential interest in the land at Parkside East.

The main purpose of these representations is to express strong support for the proposed allocation at Parkside East as a unique and deliverable opportunity for a Rail Freight Interchange ("RFI") and strategic new employment development which will be of key importance to the continued growth of St Helens and the wider Liverpool City Region.

THE NEED FOR PARKSIDE EAST

By way of context, the following paragraphs provide an overview of various documents, including those forming the main evidence base underpinning the allocation of land at Parkside East. The need for a Rail Freight Interchange ("RFI") at Parkside is consistently identified in several strategic studies and assessments, as is the need to deliver major new employment at Parkside (and elsewhere), which can also take benefit from, and support investment in, an RFI.

The development of Parkside for an RFI (and more generally as a major logistics and manufacturing location) is acknowledged as being a critical component to the economic growth of St Helen's and the wider Liverpool City Region.

The evidence base for Parkside East is extensive and robust and along with draft Policy LPA10 is strongly supported by our client as an important location for growth and enables the policy to generally meet the tests of soundness identified in NPPF Paragraph 35.

The St Helen's Employment Land Needs Study (October 2015)

It is noted that major employment facilities, including logistics, require large unconstrained sites which allow for 24-hour operation close to the strategic road network and preferably with strong links to major

port facilities. As a general point, the study notes that St Helen's has an undersupply of employment for its population, represented by the relatively low numbers of existing businesses and a net outflow of commuters.

The logistics market in the area is identified as being strong and that Parkside as a location would be attractive to the market in the absence of an RFI, but that its connectivity to the motorway and rail network make this land ideal as a multi-modal freight interchange. It goes on to identify that the provision of a RFI will broaden further the appeal for space at Parkside.

The St Helen's Employment Land Needs Study (October 2017, and Addendum January 2019)

The 2019 Addendum was commissioned to update evidence of employment land requirements and market conditions, and to assess the jobs growth potential of the St Helens Local Plan Preferred Options proposed employment allocations. Key conclusions can be summarised as including that:

- The warehousing and logistics market is performing strongly with further demand for growth in the regional market, including within St Helens, focussed particularly on the motorway corridors. The logistics sector, particularly large-scale major projects, will be a key driver of growth but with some growth also expected in manufacturing.
- The large-scale warehousing market has substantial land requirements across the Liverpool City Region, and St Helens could play a significant role in the provision of such land, especially given its proximity to the motorway network and the employment development around the former Parkside colliery (including a Strategic Rail Freight Interchange (SRFI)).
- Notwithstanding the high-level of demand, the development of large logistics space has been constrained over recent years by a shortage of supply in high quality, large, flat sites with excellent access to the motorway network and with planning support. Removal of these land supply constraints has / will generate renewed interest from occupiers for strategic locations in St Helens.

The Parkside Logistics and Rail Freight Interchange Study (August 2016)

This study provides a significant body of evidence to underpin the allocation of land at Parkside. The key conclusions which support the development of a RFI and Parkside more generally can be summarised as follows:

- There is an improving narrative behind the North West and its regional economy which has served to enhance wider market perceptions of the region. There has been significant speculative development in the North West but (as noted in the employment land study), one of the key advantages to Parkside is that it will help to improve the supply of unconstrained available strategic site supply with strategic transport accessibility.
- The use of rail freight nationally has grown significantly and the ability to deliver a RFI at Parkside could be a real 'game changer'.
- In addition to the benefits of the RFI, the Parkside site's access to both the M6 and M62 is highly advantageous, meaning that Parkside has the potential to be an 'all points' operation to serve this part of the UK.
- The co-location of employment development on the site and in the immediate area of Parkside (Omega, Haydock, Logistics North for example) will enable the scale of supply and demand to

help to support the development of intermodal train services to be offered from the site to a range of different markets and locations.

The Liverpool City Region Growth Strategy

Parkside is identified by the Liverpool City Region Local Enterprise Partnership as an intermodal infrastructure project of key importance to the successful delivery of the Liverpool SuperPort, a global freight and logistics hub serving the north of the UK. Development of Parkside can take advantage of regional developments such as the Liverpool 2 initiative and Atlantic Gateway at the Port of Liverpool, as well as opportunities that come from being part of both the Northern Powerhouse and the Liverpool City Region (LCR). As summarised in **Table 1** below, there are several other documents produced by the LCR that support / promote the delivery of Parkside to meet the economic and employment growth objectives of St Helens and of the wider City Region.

Table 1: Summary of Liverpool City Region ‘Growth Documents’

Document	Commentary
A Transport Plan for Growth (2015)	This outlines five strategic projects. One of these is the creation of a freight and logistics hub, with the aim to put the City Region in the best place to respond to changes in the UK and international logistics market. The Plan recognises that improving connectivity and capacity for freight on road and rail networks opens up access to the Port from across the UK and is therefore fundamental to supporting economic prosperity of the Region. Parkside is recognised as key to achieving the SuperPort Hub.
Liverpool SuperPort Market Analysis Land & Property Report (2014)	This provides an evaluation of demand and supply for land for logistics in the City Region over the next 20 years. The Report includes Parkside as a key site capable of accommodating part of an overall need for logistics facilities in the LCR and is therefore a crucial project to ensuring the successful delivery of SuperPort.
Liverpool City Region Long Term Rail Strategy (2014)	This sets out a vision for the role that an expanded rail offer can play in facilitating economic growth of the LCR. The strategy identifies how improving rail connections and logistic sites has particular benefit for the LCR as its peripherality for national distribution means that it is only by utilising lower-cost forms of transport, including rail and water, that the region can secure additional market share. The Strategy also recognises that there are plans for an increase in the number of strategic rail freight interchanges in the north. Parkside will therefore directly assist in rail capturing a greater market share for northbound goods entering the country via the south-coast ports.
B8 Land-use Forecasts for the Liverpool City Region (2016)	The report forecasts substantial growth in the large-scale warehouse market in the Liverpool City Region in coming years. St Helens, as an area with excellent access to the motorway network and key North-West markets, is well positioned to take a significant share of this market.

The Transport for the North (TfN) Freight and Logistics Strategy

TfN produced a Freight and Logistics Strategy in 2016 to consider opportunities to reduce the cost of freight transport and create new facilities to expand market share in the logistics sector and attract inward private sector investment to the Northern PowerHouse. One of the central recommendations is the

development of 50 hectares of rail and/ or water connected Multimodal Distribution Parks (MDPs) per year, to be located at the edge of urban centres.

Further to this Strategy, a Freight and Logistics Enhanced Analysis Report was issued by TfN in 2018. This Report forecasts significant growth in the amount of freight moved in the North of England between 2016 and 2050 (by 33% based on tonnes lifted or by 60% based on tonne kilometres). The action plan within the report outlines how one of the barriers to modal shift is the lack of multimodal terminals allowing the switch between road and rail/water.

The National Policy Statement for National Networks (“NPS”) (2015)

Beyond the local and LCR evidence base documents discussed above, there is also a national imperative to deliver improvements to rail infrastructure as a driver for the country’s economic growth.

The NPS sets out Government policies for nationally significant rail and road infrastructure projects for England. It recognises that railways are a vital part of the UK’s transport infrastructure as a driver of economic growth and social development. The NPS strongly supports the need for an expanded network of RFIs in the UK. It highlights the importance of Rail Freight Interchanges in meeting the changing needs of the logistics sector and facilitating rail freight growth; supporting the UK economy through providing national and local benefits in terms of jobs and growth; and providing environmental benefits in terms of removing goods from the road network.

THE UNIQUENESS OF THE PARKSIDE EAST OPPORTUNITY

As has already been identified, the provision of a RFI provides for something unique for the area. Unlike other land within St Helen’s, land at Parkside East (and West) can accommodate major new manufacturing and logistics development with the potential to have a direct connection to the rail network through its location adjacent to a RFI. Whilst the RFI will be able to service other locations in the area, the overall opportunity presented by Parkside cannot be replicated at other sites in St Helens, including at non-Green Belt sites, where there is no ability to create a significant rail facility to which major employment could be directly linked.

In terms of the RFI at Parkside, it is also better than most of the other possible rail-connected sites outside of St Helen’s potentially able to service the LCR because it has connections to two rail lines – north-south via the West Coast Main Line and east-west via the Chat Moss Line.

Alongside its proximity to the motorway network (Parkside is located at Junction 22 of the M6), the RFI will help to establish Parkside as an ‘all points operation’ with road and rail access across the LCR, including connectivity to the SuperPort in Liverpool and also to other parts of the UK. This will support the ambitions of the LCR (and St Helen’s Council) to bring significant investment and employment opportunities to the region.

The focus for growth in the M6 corridor area is for major logistics and land at Parkside, with or without a RFI, would be attractive to the market for the reasons previously explained. In this regard, it is noteworthy that major improvements to road accessibility to and around Parkside is being delivered which will further enhance its attractiveness. For example:

- Highways England has recently instructed a contractor to design and build a smart motorway on an 11 mile stretch between junctions 21a and 26. This is expected to be complete in Spring 2021.

One of the aims of the smart motorway is to support the economy and facilitate economic growth in the region; and

- Delivery of the Parkside Link Road in 2020/21 to fully open-up the development opportunity at Parkside (also see later sections of this letter).

The provision of an RFI will help to stimulate new demand in the logistics sector. Such a facility could however also encourage the growth of new sectors at Parkside, such as in major manufacturing and innovation hubs which can also take advantage of connectivity to major road and rail infrastructure. Such an approach would mirror the work iSec are currently undertaking at Thames Enterprise Park in Thurrock (further details are provided below).

DELIVERABILITY

There are several important factors which support the deliverability of land at Parkside East for an RFI and major logistics and manufacturing development. These, inter alia, include the following:

Involvement of a Proven Delivery Partner

iSec is keen to work with St Helens Council as a potential partner to bring forward the development of Parkside East. iSec is part of the Marcol Group, a privately owned and funded property company, operating in the industrial, residential, office, retail, hotel and healthcare sectors. iSec specialises in industrial development and asset management, with total assets under management valued at £2.5bn. Current pipeline includes:

- 665,000sqm of logistics development;
- 320ha of strategic land;
- 6,000 residential units; and
- 4 major strategic sites in the UK.

In addition to the above, iSec, along with their JV partner Greenergy, recently submitted a planning application for 167ha of brownfield land in the Thames Estuary for circa 480,000sqm of predominantly B2/B8 with an Energy Park, Food Park and Sustainable Industries Park, and land set aside for a rail freight terminal. Work on the remediation of this site as already started, and the first phase should be ready for development from 2020.

Other developments on site include the redevelopment of the former Rolls Royce East Works site at Filton, a 65 hectare site known as Horizon 38. Permission was granted in 2015 for up to 111,500sqm, with around 53,885sqm being developed speculatively for B2/B8 and the remainder for mixed use leisure, commercial and car dealerships. A global technical centre (10,590sqm) has recently been developed for GKN, as the overall site nears completion.

Remediation work is currently ongoing on the former Coalite chemicals and coking works site in Derbyshire, a 60ha site with outline permission for B2/B8. iSec have worked over a number of years with the Local Enterprise Partnership and Councils to secure funding to overcome some complex remediation and viability issues, as well as with HS2 to ensure that the masterplan is deliverable in light of recent safeguarding. The first phase of this development is expected to start on site later this year.

The above demonstrates a strong track record in not only securing planning permission on complex sites, but also the delivery of these sites, often overcoming issues of remediation and wider connectivity to deliver development to the market and create clusters of specialist sectors within the wider B2/B8 use classes.

Market Demand

As emphasised elsewhere in these comments, it is widely accepted that land at Parkside will be highly attractive to major occupiers seeking a strategically located and highly accessible location in the M6 corridor.

Evidence suggests that the Parkside site would be attractive to the market for major logistics (and manufacturing) development in the absence of an RFI but that its connectivity to the motorway and rail network make this land ideal as a multimodal freight interchange. Along with the SuperPort, the RFI is recognised as being a driver for growth, having the potential to increase demand for employment land in the region, including within St Helen's, particularly for B8 and B2 uses.

There is a recognised need for a RFI to support the growth of the LCR and Parkside East offers an excellent location for this as well as for major commercial employment development. RFI's require large areas of land and generate substantial activity throughout the day and night, 7 days a week. Such facilities therefore suit out of urban areas locations (e.g. well-connected countryside locations which are not directly next to urban residential areas), and are typically large, flat types. Parkside East is very well suited in this regard. It also outperforms other potential RFI locations that could serve the City Region, including in terms of the degree of rail connectivity it can provide. The development of Parkside West (which has been planned to be able to provide for future connection to a RFI at Parkside East in the future), along with employment at Parkside East itself, will further support the rationale and delivery of the RFI, along with the various other major existing and proposed major commercial developments in the area.

In summary, the location and scale of the site, together with the opportunity for major new employment growth to be served by rail with the development of an RFI, makes Parkside East a unique opportunity for the area and an important component of the overall growth strategy for St Helen's and the wider City Region area.

Parkside Link Road

As noted previously, Parkside East is strategically positioned at Junction 22 of the M6 motorway. Additionally, it is important to highlight that delivery of the Parkside Link Road ("PLR"), which is expected by 2021, will fully open up the development of Parkside, including Parkside East. Major infrastructure funding towards the delivery of the PLR was secured in October 2018 through the Liverpool City Region Single Investment Fund. Detailed planning permission for the road is expected in 2019 and it is understood that the Council is working collaboratively with Highways England to facilitate delivery of the scheme and the major development at Parkside that this will support.

DRAFT POLICY LPA10

Our Client iSec wishes to express strong support for the proposed allocation at Parkside East. This includes the principle of an RFI and the potential to deliver 'other forms of B2 and B8 employment'. The provision of an RFI in this location is recognised as an important element to overall delivery of land at Parkside East,

which should be complemented by the ability to develop major new manufacturing and logistics space to take advantage of the site's excellent connectivity.

To maximise the deliverability of Parkside East, we recommend a minor modification to the wording of the existing draft policy which currently requires a minimum of 60 hectares of Parkside East to be a SRFI. This minimum size appears to be based on the NSIP threshold as set out in the Planning Act 2008, rather than other evidence base information which does not generally specify the size of the RFI at Parkside.

Paragraph 4.36.16 of the Submission Plan explains that the Council reserves 60ha of land at Parkside East to provide related rail and road infrastructure and landscaping. If this is the intent of the Policy, and the 60 hectares is not also intended to include rail-served warehousing and manufacturing (as would normally be included as part of a SRFI), then setting aside this amount of land specifically for rail and road infrastructure may be excessive. For example, the East Midlands Rail Freight Terminal, whilst covering a total of 283ha of land, incorporates a Rail Freight Interchange (including rail sidings, infrastructure and associated container storage and HGV parking) of 20ha, considerably smaller than the 60ha referenced in the Submission Plan.

Similarly to the East Midland Rail Freight Terminal, iPort Doncaster is a rail-served employment development covering 136ha, of which 14ha comprises the Rail Freight Terminal (including rail sidings, infrastructure and associated container storage and HGV parking). This site was also formerly Green Belt site, as is Parkside East, and has let to major occupiers such as Amazon and Lidl.

Should the rail freight interchange infrastructure at the site require a smaller land area than identified in the policy, this should not fetter the opportunity to deliver additional B2 and B8 employment development at the site in its place, particularly if this includes rail served warehousing and manufacturing. This approach would better ensure that the Policy does not restrict flexibility and deliverability in line with NPPF paragraphs 81 and 82.

We therefore suggest that the minor amends to the wording of Part 2 of Policy LPA10 so that it reads as follows (text to be deleted is shown as ~~strike through~~) and is therefore fully justified and consistent with national policy:

-
2. The site is also considered suitable in principle for other forms of B2 and B8 employment use provided that they would:
- a) bring significant inward investment, local employment and training benefits for the local community; and
 - b) (i) be rail served (i.e., requiring on-site access to a railway); or
(ii) be of a layout and scale that would not prejudice the ability to develop an effectively laid out SRFI or other rail served employment development (including any necessary rail and road infrastructure, buildings and landscaping), on at least 60 hectares of the site, at any time in the future.
-

Paragraph 4.36.16 of the Submission Plan should also be amended to reflect the above comments.

SUMMARY

It is clear from the evidence base which helps to inform the local plan that land at Parkside makes an important contribution to the supply of deliverable and strategically accessible employment land in the M6 motorway corridor, particularly for / in support of the logistics (and manufacturing) sectors. Our client

supports the key findings of the evidence base, which is considered to provide a robust basis for the emerging policy which flows from this.

There is a need to boost the supply of deliverable employment opportunities to cater for major investors who require large, unconstrained and highly accessible land opportunities. The ability for Parkside to deliver a RFI, alongside major manufacturing and logistics development, will be a 'game changer' and is a highly important part to the delivery of the overall growth strategy for St Helen's and the City Region.

Parkside East is a unique and deliverable opportunity and our Client strongly supports its allocation through draft Policy LPA10. The body of evidence, and the recognised substantial economic benefits Parkside East would bring help to justify the exceptional circumstances for the release of land from the Green Belt.

In order to maximise flexibility and deliverability, whilst not diluting the purpose and aims of this policy, a minor amendment to its wording is recommended, and is therefore considered to fully meet the NPPF tests of soundness.

I trust that the above responses are of assistance in informing the next stages of the St Helens Local Plan. Should you have any queries or require further details, please do not hesitate to contact me on [REDACTED]

Yours faithfully,

[REDACTED]
RICHARD BROWN
DIRECTOR

FOR AND ON BEHALF OF CBRE LTD.

RO1964

ELO251

Site 6HS



St Helens Borough Local Plan 2020-2035 (Submission Draft) - Representations
Nellist, Paul (Avison Young - UK)
13/03/2019 16:47
To:
planningpolicy@sthelens.gov.uk



2 Attachments



Response Form 13.03.19.pdf Final Chapel Lane Representations 13.03.19.pdf

Dear Sir or Madam

I attach a response form and representations made on behalf of Seddon Construction Limited to the St Helens Borough Local Plan 2020-2035 (Submission Draft) consultation.

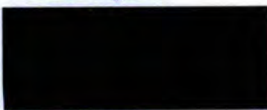
Please let me know if you have any issues downloading or opening the attached files.

Hard copies will follow in the post.

Kind regards

Paul Nellist
Principal Planner

Avison Young
Norfolk House
7 Norfolk Street
Manchester
M2 1DW
United Kingdom



① - LPA06

② - LPA05

③ - GBR

④ - LPA05 - TABLE 4-7.



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Avison Young is the trading name of GVA Grimley Limited.
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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;

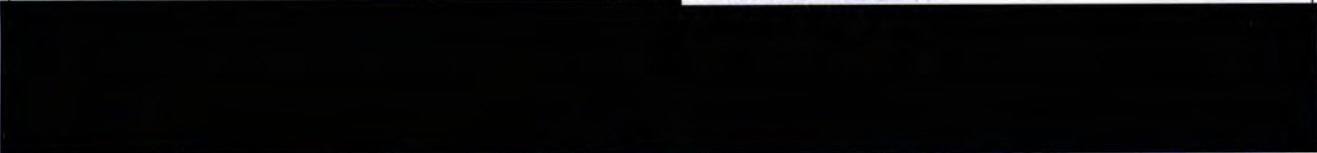
Part A – Personal Details

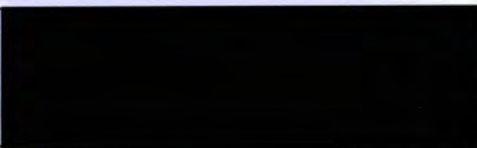
Part B – Your Representation(s).

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: Paul
Last Name:	Last Name: Nellist
Organisation/company: Seddon Construction Ltd	Organisation/company: Avison Young
Address: c/o Agent	Address: Norfolk House 7 Norfolk Street Manchester United Kingdom
Postcode:	Postcode: M2 1DW



Signature: 	Date: <input type="text" value="13/3/2019"/>
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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 (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)

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	✓ SEE ATTACHED REPRESENTATIONS	Paragraph / diagram / table	✓ SEE ATTACHED REPRESENTATIONS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Please see attached representations			

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 <u>not legally compliant</u> or is <u>unsound</u> 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
Please see attached representations

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 attached representations

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
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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:

To set out the merits of the Chapel Lane site and provide additional comments on any Matters, Issues and Questions raised by the Inspector.

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.**

**Representations to the St. Helens Submission Draft
Local Plan**

Land at Chapel Lane

March 2019

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Appendices

Appendix I Development Statement (September 2018)

Appendix II Letter from LM6 (6th March 2019)

Prepared By: Paul Nellist

Status: Final

Draft Date: March 2019

For and on behalf of GVA Grimley Limited t/a Avison Young

1. Introduction

- 1.1 Avison Young has been instructed by Seddon Construction ("Seddon") to submit representations to St.Helens Council's consultation on the St.Helens Borough Local Plan 2020-2035 Submission Draft. The consultation is running from 17th January 2019 until 14th March 2019.
- 1.2 These representations are submitted in the context of Seddon's interest in land at Chapel Lane, Sutton ("the site")¹ with Seddon having been selected as the preferred development partner by Kingsland Strategic Estates ("KSE") who control the site. These representations should be read alongside previous representations relating to the site, which has been promoted throughout the preparation of the St.Helens Local Plan including:
- Representations by KSE to the Scoping and Call for Sites consultation in March 2016;
 - Submission by KSE of supplementary information to the Scoping and Call for Sites consultation in July 2016, following discussions with planning officers;
 - Representations by KSE to the Preferred Options consultation in January 2017; and
 - Submission of a detailed Development Statement to St.Helens Metropolitan Borough Council ("SHMBC") by Seddon in September 2018.
- 1.3 The site was allocated for housing in the Preferred Options Local Plan (December 2016) (Site HA4) and was changed to be a safeguarded site for housing in the Submission Draft Local Plan (December 2018) (Site 6HS).
- 1.4 The remainder of these representations:
- Demonstrate that the site is deliverable and sustainable;
 - Set out the background to the site in the context of the previous stages of the St.Helens Local Plan (Preferred Options);
 - Summarise the parts of the Submission Local Plan most relevant to the site;
 - Express Seddon's support for the removal of the site from the Green Belt and allocation as safeguarded land for future development; and
 - Make other comments on relevant parts of the Submission Local Plan.
- 1.5 We respectfully request that these representations and previous representations are taken into account in the preparation of the St.Helens Local Plan.

] ①

2. The Chapel Lane Site

- 2.1 As demonstrated in the Development Statement submitted by Seddon in support of the Chapel Lane site (attached at Appendix 1), it is wholly suitable for release from the Green Belt and allocation for housing. The site is suitable, achievable, deliverable and does not contribute to the Green Belt purposes. A summary of the key points from the Development Statement is provided below.] ①

Site and Surroundings

- 2.2 The site extends to approximately 4.25 hectares and comprises arable farmland separated by an extensive area of mature woodland which links to a further area of woodland enclosing the east of the site. Part of the site within the wooded area was the former premises of the Dolly Blue factory and workers' cottages. Many of the original bases to these buildings remain within the woodland and the areas adjacent to it. ✓
- 2.3 The site abuts the south western edge of Sutton and is bounded to the north and east by residential properties which vary in style and character. To the north of the site, Lea Green Business Park is accessed from Walkers Lane and comprises several industrial and business units. The site is bounded to the west by Chapel Lane, beyond which is agricultural land. There is further agricultural land, with some dispersed farm dwellings, to the south of the site. A Site Location Plan is provided below. ✓



Figure 1 – Site location plan

A Sustainable Location

- 2.4 Within 1km of the centre of the site there are a number of local level services and facilities including employment and leisure units at Lea Green Business Park to the north of Walkers Lane, four convenience stores (including one at a petrol filling station); two hot food takeaways; allotments (located to the west of Walkers Lane); and access to a range of green spaces. There are also a range of schools and community and recreational facilities in proximity to the site. ✓
- 2.5 There is a further range of services and facilities located just outside the 1km catchment of the site. These include the Four Acre Shopping Centre (incorporating a large convenience store, pharmacy and other retail units), Chester Lane Library, the Beefeater Mickle Head Green public house and restaurant and the Premier Inn St.Helens South hotel. ✓
- 2.6 The site is well served by the existing public transport network with bus stops located in direct proximity to the site on Walkers Lane to the north and on Forest Road to the north-east, which are approximately 150 metres and 190 metres from the site respectively and provide regular direct connections to the Four Acres Shopping Centre. The nearest railway station, Lea Green, is located approximately 2km from the site and the A570 St.Helens Linkway offers good vehicular access to the site and links to the strategic road network (M62) to the south via Chapel Lane. ✓
- 2.7 The site is therefore sustainably located and offers residents opportunities to use sustainable modes of transport to access local services, facilities and employment opportunities.] ①

Sustainable Development

- 2.8 The NPPF sets out at paragraph 8 that sustainable development should have positive economic, social and environmental benefits and meet the needs of the present without compromising the needs of future generations. The release of the site from the Green Belt and its allocation for housing will meet the three objectives of sustainable development: ✓

Economic Objective:

- 2.9 The development of the site will contribute to building a strong, responsive and competitive economy. The construction of high-quality residential units will deliver direct economic benefits and spin-off benefits to the local economy through the creation of jobs. The delivery of family and affordable houses will secure several economic and fiscal benefits in terms of job creation, additional monies to the Council and increased expenditure in the local economy. ✓

Social Objective:

- 2.10 The development of the site will help to support strong vibrant and healthy communities by providing a range of open market housing comprising various types to meet the needs of St.Helens and the surrounding area. There will also be an element of affordable housing provided in line with the Borough's requirements and Seddon has a Registered Provider ready to deliver the affordable element on this site. In addition, Public Open Space will be provided within the development which will seek to integrate with existing open space and also provide green corridors throughout the site which link to the pedestrian and cyclist network in the locality. ✓

Environmental Objective:

- 2.11 The site is currently in agricultural use and has limited ecological value. The proposed development will retain all trees on the site, including the entirety of the woodland to the south, thus maintaining the long term wider visual public amenity associated with the trees on this site in both the wider landscape and on the Chapel Lane frontage.
- 2.12 The majority of the site is located in Flood Zone 1 which is defined as having a less than 1 in 1000 years annual probability of flooding. Overall, the site is considered suitable for residential development in flood risk terms and appropriate sustainable drainage measures will be implemented to maintain existing runoff rates.
- 2.13 A suitable and safe access to the development could be provided from Chapel Lane via a priority controlled junction. The local highway network has the capacity to accommodate the additional traffic generation and as part of any planning application, if necessary, a package of off-site highway improvements could be agreed to mitigate any severe impacts on the transport network as a result of the proposed residential development.
- 2.14 Pedestrian footways will be provided throughout the proposed development, offering comprehensive links around the site, with pedestrian and cycle access to the site provided at 3 points on Chapel Lane, Walkers Lane and Shakespeare Road.
- 2.15 Furthermore, there are not considered to be any other environmental constraints relating to ground conditions, landscape and visual impact, utilities and infrastructure, archaeology and heritage or air quality and noise that would inhibit the development of the site.

The Five Purposes of the Green Belt

- 2.16 When tested against the purposes of the Green Belt (as set out in Paragraph 134 of the NPPF), the site presents a significant opportunity to support a sensitive residential development that will not prevent the Green Belt from functioning effectively in this location. The site's contribution to each of the five Green Belt purposes is considered in turn.
- **To Check the Unrestricted Sprawl of Large Built-up Areas:** The site has defensible boundaries on all sides and would form a natural extension to the existing urban area. As such, the site is not required to check the unrestricted sprawl of the Sutton area.
 - **To Prevent Neighbouring Towns from Merging into One Another:** Development of the site would not result in the merging of neighbouring towns and would maintain the functions and separation of the Green Belt in this location. Furthermore, the two areas are physically separated by the St.Helens Linkway Road which is a strong, permanent defensible boundary.
 - **To Assist in Safeguarding the Countryside from Encroachment:** The site is well related to the existing urban area and benefits from strong existing boundaries in all directions. The sensitive development of the site will not affect the purpose of safeguarding the countryside from encroachment in this location.

- **To Preserve the Setting and Special Character of Historic Towns:** The sensitive development of the site would not impact on the character or setting of any Listed Buildings or Conservation Areas. St.Helens is not a nationally recognised historic town and there are none within the vicinity of the site.
 - **To Assist in Urban Regeneration, By Encouraging the Recycling of Derelict and other Urban Land:** The release of the site from the Green Belt would not prevent the recycling of derelict land and other urban land because insufficient brownfield sites are available to meet the future housing needs of the Borough.
- 2.17 Overall, the site does not make a contribution to the five purposes of the Green Belt, which has not only been demonstrated through Seddon's Development Statement, but has also been acknowledged by St.Helens Council through its own Green Belt Review and its decision to remove the site from the Green Belt.

Deliverability of Development

- 2.18 To be considered deliverable, a site should be available, suitable and achievable.

Available

- 2.19 Seddon has been selected as the preferred development partner for the site which has been proactively promoted throughout the Local Plan process. The site is in control of a major housing developer and can be developed to provide up to 120 dwellings to meet both the open and affordable market needs of the Borough.

- 2.20 The site is therefore considered available in the context of the NPPF.

Suitable

- 2.21 The site is suitable for residential development for the following reasons:

- It can be developed immediately following its allocation and removal from the Green Belt;
- It will form a natural extension to the established area of Sutton;
- There are no identified environmental constraints which would prevent the development of the site for up to 120 dwellings;
- Development could utilise the existing infrastructure of the surrounding area and there are no drainage or utilities constraints which could prevent the site coming forward, as demonstrated in detail in Appendix 1 (Environmental Considerations) of the Development Statement attached at Appendix 1 of these representations;
- A satisfactory access from Chapel Lane can be accommodated;
- The site is situated within a local highway network which has the capacity to accommodate these additional dwellings;
- The development will deliver new open space for use by new and existing residents; and,

- The site is sustainably located and close to existing bus stops and local services and facilities.

2.22 The site is therefore considered suitable in the context of the NPPF.

Achievable

2.23 Seddon has undertaken a viability assessment of the site including land values, market demand and potential sales within the Borough. On this basis, Seddon can confirm that this site is an economically viable proposal and is therefore achievable in the context of the NPPF.

Summary

2.24 The site at Chapel Lane represents a logical and appropriate extension to the existing urban area. The site is highly sustainable with good access to a range of existing services and facilities and offers an opportunity to deliver high quality family and affordable homes to meet St.Helens' housing need early in the plan period.] ①

2.25 This has been demonstrated through both Seddon's assessment of the site through the comprehensive Development Statement (Appendix 1), and through St.Helens own assessment of the site through its Green Belt Review (December 2018). ✓

3. Background

Preferred Options Stage

3.1 SHMBC's 'Preferred Options' consultation, undertaken from December 2016 to January 2017 set a housing requirement for St.Helens of 570 dwellings per annum. This requirement was based on the figure within the St.Helens' adopted Core Strategy. The Preferred Options Local Plan included 16 draft housing allocations, including the site (Site HA4 - Land East of Chapel Lane and south of Walkers Lane, Sutton Manor with an estimated delivery of 95 dwellings between 2018 and 2033) to meet this requirement.

3.2 The Preferred Options Local Plan also identified 24 sites to be removed from the Green Belt and safeguarded for housing.

3.3 KSE made representations to the Preferred Options consultation supporting the proposed allocation of Site HA4 for housing development and setting out the findings of ongoing technical studies undertaken to reinforce the deliverability of the site.

Seddon's involvement in the site

3.4 Seddon acquired an interest in the site in early 2018 and appointed Avison Young (formerly GVA HOW Planning) to prepare and submit a detailed Development Statement to St.Helens Council in September 2018. This Development Statement demonstrates the suitability of the site for release from the Green Belt, its suitability to be allocated for housing, and its deliverability. A copy of the Development Statement is attached at Appendix 1.

4. Submission Draft Local Plan

Housing Numbers and Allocations

- 4.1 Within the Submission Draft Local Plan (December 2018), a housing requirement of 486 dwellings per annum is proposed, a significant reduction from the figure of 570 dwellings per annum that was being pursued at Preferred Options stage.] ②
- 4.2 The St.Helens SHMA Update 2018 uses recently published household and population projections, together with updated data linked to the development of employment site allocations to assess the housing OAN and indicates a range of annual housing needs figures based upon various scenarios. The figure of 486 dwellings per annum is derived from 'Economic Scenario 2', Sensitivity Option 3 set out in the SHMA Update 2018 and is very slightly higher than the OAN calculated using the Government's standard method and the 2014-based household projections (468 dwellings per annum). ✓
- 4.3 The Submission Draft Local Plan includes 10 proposed housing allocations to meet the identified requirement as set out in Table 4.5 (Page 41). Unlike the Preferred Options Local Plan, this does not include the Chapel Lane site. ✓
- 4.4 Of particular note is the removal of the Chapel Lane site as a housing allocation and the introduction of a few very large housing allocations including:] ②
- 4HA - Land bounded by Reginald Road/Bold Road/Travers Entry/Gorse Lane/Crawford Street, Bold (Bold Forest Garden Suburb) – 133ha, 2,988 dwellings (480 within the plan period);
 - 6HA - Land East of City Road, Cowley Hill, Town Centre – 31.09ha, 816 dwellings (540 within the plan period); and,
 - 10HA - Moss Nook Urban Village, Watery Lane, Moss Nook – 26.74ha, 802 dwellings.
- 4.5 The Submission Draft also identifies 8 sites, including the Chapel Lane Site (Site 6HS - Land East of Chapel Lane and south of Walkers Lane, Sutton Manor with an indicative capacity of 113 dwelling), to be removed from the Green Belt and 'safeguarded' to meet longer term housing needs beyond the Plan period. Draft Policy LPA06 states that: ✓

"The sites identified as Safeguarded Land on the Policies Map have been removed from the Green Belt in order to meet longer term development needs well beyond the Plan period. Such Safeguarded Land is not allocated for development in the Plan period. The future uses for which the sites are safeguarded are listed in Tables 4.7 and 4.8. 2. 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. Accordingly, proposals for housing and employment development of safeguarded sites in the Plan period will be refused." ✓

Green Belt Review (December 2018)

4.1 A Review of the Green Belt was undertaken as the Council had identified a shortfall of suitable land within its existing urban areas. The Review assesses the relative contribution that different parts of St.Helens make to the purposes of Green Belt. The Review splits all Green Belt areas in the Borough into parcels then assesses the potential for development in those areas that contribute least to the purposes of the Green Belt, taking into account site-specific constraints such as flood risk, ecology and access. The Review provided a key input into the selection of sites to be allocated for development, as identified in the Submission Draft.] ③

4.2 Within the Green Belt Review, the site (Parcel Ref: GBP_082a - Land East of Chapel Lane and South of Walkers Lane, Sutton Manor) was considered at Stage 3 for residential use and was given an overall score of 5 (just one point below the sites that were allocated). The commentary in Table 5.4 at page 111 provides comments on the Council's decision to safeguard the site and states that:

"The sub-parcel was proposed by the Council as an allocated housing site at LPPO stage. However, its characteristics, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to it."

4.3 The commentary then goes on to state that the site is:

"further from the nearest local centre than is the case for example for the nearby parcel GBP_080. It is now seen as being more suitable to form a longer term extension of the urban area, which could contribute to meeting housing needs after the end of the Plan period."

5. Seddon's Comments on the Submission Draft Local

Removal of the Site from the Green Belt and Safeguarding

5.1 The Chapel Lane site is proposed to be removed from the Green Belt and allocated as a 'safeguarded housing site' (Site 6HS) to meet longer term housing needs well beyond the plan period. ✓

5.2 Seddon **fully supports** the removal of the site from the Green Belt given that the site represents a logical extension to the existing settlement, is sustainably located, is not required to meet the five purposes of the Green Belt and is wholly suitable for release from the Green Belt. The Council's decision to propose a safeguarding allocation, and the assessment in the Green Belt Review confirm that the site does not make a contribution to the five purposes of the Green Belt and is wholly suitable for release from the Green Belt. ✓] ③

5.3 Seddon also **supports** the proposed safeguarding of the site in the Submission Draft Local Plan.

Housing Requirement

5.4 However, the site has been effectively downgraded to a safeguarded site from the previous proposed allocation in the Preferred Options Local Plan. The only justification for this downgrading appears to be that

in the Green Belt Review, which in summary is a result of the reduced housing requirement for the Borough, and the site's proximity to the nearest Local Centre when compared to site 5HA.] ③

- 5.5 Central to the NPPF is a presumption in favour of sustainable development, set out at Paragraph 11. For plan-making this means that plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change; and strategic policies should, **as a minimum**, provide for objectively assessed needs for housing. ✓
- 5.6 The Planning Practice Guidance ("PPG") (Housing and Economic Needs Assessment) makes it clear that the standard method uses a formula to identify the **minimum** number of homes expected to be planned for and does not produce a housing requirement figure.²
- 5.7 As set out at Section 4 of these representations, the Submission Draft sets a housing requirement of 486 dwellings per annum based on 'Economic Scenario 2', Sensitivity Option 3 in the SHMA Update 2018. This figure is only just above the minimum number of homes expected to be planned for using the Government's standard method. ✓
- 5.8 A key objective of the NPPF is to support the Government's objective of significantly boosting the supply of homes. Paragraph 67 states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan. ✓
- 5.9 The NPPF sets out a number of measures to maintain the supply and delivery of housing including the Housing Delivery Test. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years. ✓
- 5.10 SHMBC's decision to plan for just above the minimum requirement presents a serious risk that the Local Plan will underdeliver on its housing requirements and that that Housing Delivery Test will not be passed, particularly in the early years following adoption of the plan.] ②

The Need for an Appropriate Mix of Sites

- 5.11 The Submission Local Plan includes a significant change in strategy towards housing allocations when compared to the Preferred Options plan. SHMBC has chosen to allocate fewer (10 sites compared to the previous 16) but on the whole much larger sites in the Submission Local Plan. Whilst Seddon acknowledges the importance of prioritising brownfield sites before releasing land from the Green Belt, relying on fewer, larger sites increases the risk of the plan not delivering should one or more of the sites experience delays or issues with delivery, which is more likely for large, complex sites such as those now proposed for allocation. The large brownfield sites (e.g. 9HA and 10HA) will require substantial remediation and larger sites in general will require] ②

² Reference ID: 2a-002-20190220

comprehensive masterplanning, including securing the provision of infrastructure improvements, before they can come forward.

- 5.12 Paragraph 68 of the NPPF highlights that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.
- 5.13 Due to the change in strategy, SHMBC will be relying on two large allocation 4HA and 5HA to deliver all of the housing in the south western part of the Borough (where the Chapel Lane site is located) over the plan period (1,000 dwellings estimated between the two sites over the plan period). For the reasons set out above, relying on just two large allocations presents a risk that delivery will fall short of the requirement, particularly in the early years following adoption whilst those large sites are mobilised. Furthermore, due to the scale of such large sites some of the homes proposed will be quite a distance from the nearest local centres and connections to public transport. ②
- 5.14 SHMBC should include a more appropriate mix of sites to meet its housing requirement and in particular in this part of the Borough. The allocation of the Chapel Lane site, in addition to the two large allocations (4HA and 5HA) would ensure an appropriate mix of sites in this part of the Borough and would help ensure delivery across all of the plan period, including the early years. ②
- 5.15 Alternatively, a slight reduction in the number of dwellings to be delivered within one or more of the large strategic allocations within the plan period, and the allocation of additional smaller sites (i.e. the Chapel Lane site) would ensure that the plan complies with the NPPF's objective to bring forward small and medium sites and offer greater certainty of delivery. ✓
- 5.16 As demonstrated in detail in the previous section, the site at Chapel Lane is in control of a major housing developer that is committed to delivering homes on the site. In addition, there are no physical, technical or environmental constraints that would preclude the development of the site early in the plan period. SHMBC should therefore re-introduce the site at Chapel Lane as a housing allocation in the Local Plan. ✓

Location in Relation to Employment Sites

- 5.17 Paragraph 104 of the NPPF states that:

"Planning policies should:

a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;"

- 5.18 In this context, the Council is proposing two employment allocations (1EA and 10EA) and one safeguarded employment site (1ES) in this part of the Borough (See Figure 2 below). As demonstrated by the letter from LM6 (Appendix 2) both 1EA and 1ES will be required within the plan period and therefore the Council should consider allocating 1ES. ✓
- 5.19 Of all of the proposed housing allocations and safeguarded sites in this part of the Borough, the Chapel Lane site is the best located for overall access road access to the proposed employment allocations (via Chapel Lane and the St Helens Linkway/Lea Green Road to 10EA; and, via Chapel Lane, the St. Helens Linkway and ②

6. Summary and Conclusions

- 6.1 These representations have demonstrated that the site is in an appropriate and sustainable location for residential development and that it represents a highly sustainable solution to meeting St.Helens' housing needs in accordance with Government guidance and the NPPF. The site will meet the economic, social and environmental objectives set out in Paragraph 8 of the NPPF and will deliver the type, quality and quantity of new homes that will support the growth of St.Helens over the plan period.
- 6.2 Seddon **fully supports** the removal of the site from the Green Belt and supports its allocation as Safeguarded Land for Housing.
- 6.3 However, Seddon also considers that SHMBC's strategy of relying on a few large housing allocations to deliver the housing requirement over the plan period presents a significant risk that delivery could fall below the level needed. To mitigate this risk and ensure that the Local Plan is flexible and effective, the Council should therefore allocate the Chapel Lane site as a smaller site that has been proven to be deliverable in the early years of the plan period and which is suitably located in relation to the nearest proposed employment sites.
- 6.4 This is particularly important in the south western part of the Borough where the Chapel Lane site is located, as the currently proposed strategy in the Submission Local Plan relies on just 2 very large allocations to deliver 1,000 houses between them over the plan period.
- 6.5 Seddon therefore considers that the Chapel Lane site should be re-introduced as a housing allocation in the Local Plan.

Appendix I Development Statement (September 2018)

LAND AT CHAPEL LANE ST. HELENS

| DEVELOPMENT STATEMENT

| AUGUST 2018



Seddon

GVA HOW Planning

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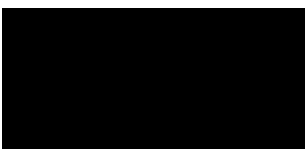
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I FOR MORE INFORMATION PLEASE CONTACT:

Plodder Lane, Edge Fold,
Bolton, BL4 0NN



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| EXECUTIVE SUMMARY

This Development Statement has been prepared by Seddon Construction Limited (“Seddon”) to support the allocation and removal from the Green Belt of Land at Chapel Lane, Sutton Manor and its allocation to provide for the housing needs of St. Helens.

Development of the site would form a natural urban extension to the established settlement and would not compromise the purposes and functions of the Green Belt in this location. The Land at Chapel Lane presents an opportunity to deliver much-needed new family and affordable homes to meet the future housing needs of the Borough, in a highly sustainable location. The Council has recognised this through including the site as an allocation in the Preferred Options Local Plan.

As part of the Bold Forest Park, the Land at Chapel Lane provides a unique opportunity to deliver sensitively designed residential development with an attractive landscape and green space network. Therefore, only this proposed allocation can fully contribute to the objectives of the Bold Forest Park Area Action Plan.

This Development Statement provides an illustrative masterplan for the site, informed by an assessment of environmental considerations and the opportunities and constraints presented by the site. This Development Statement demonstrates that the site is suitable and available to deliver up to 120 open market, affordable and high quality dwellings as benefits to the Bold Forest Park.

The Vision

The Chapel Lane site offers a unique opportunity to deliver a high quality sustainable residential development that will positively and sensitively contribute towards the housing needs of the Borough whilst maintaining the purpose and functions of the Green Belt and contribute to the objectives of the Bold Forest Park Area Action Plan. The Vision for the site is:

“TO CREATE A SAFE AND AESTHETICALLY PLEASING DEVELOPMENT THAT INTEGRATES INTO BOTH THE EXISTING BUILT FORM TO THE NORTH AND RESPECTFULLY SITS WITHIN AND CONNECTS TO THE MATURE LANDSCAPED SETTING, INCLUDING BOLD FOREST PARK. THE LAND AT CHAPEL LANE WILL PROVIDE NEW HOMES OF QUALITY TO MEET LOCAL NEEDS WITH A CHARACTER THAT IS BEFITTING OF THE AREA.”











To support the Vision, this Development Statement clearly articulates the opportunity presented by the site and its surrounding context. In summary, it demonstrates that:

- The site represents a logical and natural extension to the existing urban area that has strong physical boundaries, is well-contained physically and visually and does not contribute significantly to the five purposes of the Green Belt;
- The site is entirely suitable, achievable and deliverable for a residential development in accordance with the NPPF; and will deliver a mix of housing types, including both market and affordable homes to meet local needs;

- The site is sustainably located on the edge of the existing urban area of Sutton Manor and is within proximity to a wide range of local-level services and facilities including high-quality public transport links;
- The site can accommodate a high quality residential-led development that sensitively integrates with and enhances the surrounding landscape features, delivering a new permanent Green Belt boundary at the southern edge of Sutton;
- The development of the site will provide a network of high-quality footpaths and areas of open space that provide permeability within the site and with the surrounding area. Green linkages will also enhance access to leisure opportunities, including to the King George V Playing Fields and beyond this, to the Bold Forest Park;
- New public access to currently inaccessible non-designated heritage assets on the site in the form of Brooks Cottage and Brooks Works can also be provided together with informative signage for residents and visitors to celebrate the rich industrial heritage of the site and area;
- New public access to the existing woodland on-site to make it a feature for the local community that can be enjoyed and celebrated by residents and visitors;
- The development of the site will generate significant material social and economic benefits, by stimulating economic investment and job creation and providing housing choice; and,
- There are no identified technical or environmental constraints that will prevent the delivery of housing on the site.

ILLUSTRATIVE MASTERPLAN

KEY

-  Application Boundary: 7.8ha
-  Retained Trees and Hedgerow
-  Primary Access Road
-  Potential Emergency Access Link
-  SuDS Pond
-  Proposed Development Parcels
-  Proposed Areas of Open Space
-  Secondary Access Roads and Private Drives
-  Illustrative Key Aspect Views
-  Potential Pedestrian Routes



| SECTION 1

INTRODUCTION

SECTION 1 INTRODUCTION

The Land at Chapel Lane, Sutton Manor (“the site”) represents a logical and appropriate extension to the existing urban area. The site is highly sustainable with good access to a range of existing services and facilities and offers an opportunity to deliver up to 120 high quality family and affordable homes to meet St. Helens’ housing need and to contribute to achieving the objectives of the Bold Forest Park Area Action Plan (“AAP”).

Purpose of the Development Statement

This Development Statement has been prepared by Seddon Construction Limited (“Seddon”) to promote the allocation of the Land at Chapel Lane for housing within the St. Helens Local Plan (“SHLP”), which will also require the site to be released from the Green Belt. St. Helens has a critical need for new homes which cannot be met within the existing urban areas. As a result, it has been firmly established by the Council that sensitive Green Belt release will be required in order to meet this demand. The site’s release from the Green Belt and its allocation for housing would represent a wholly logical and appropriate alteration to the Green Belt in St. Helens.

This Development Statement presents an analysis of the site and its surroundings and sets out in detail, the case for the removal of the site from the Green Belt. This includes a review of the current and emerging planning policy position and an assessment of the site against the five purposes of the Green Belt. This Development Statement then sets out the Vision for the site, informed by a consideration of the constraints and opportunities and an illustrative Masterplan demonstrating how the Vision can be achieved through a sensitively designed residential scheme. The document then assesses the sustainability of the site against the overarching pillars of sustainable development and provides a review of key technical considerations before demonstrating that the site is available, suitable and achievable. The document concludes with a concise summary of the site, the proposed development and its key benefits.

Summary of case for Green Belt release

The St. Helens Green Belt has not been substantially altered since it was established by the Merseyside Green Belt Local Plan in 1983. It is now necessary to review and amend the Green Belt boundaries if sufficient land is to be allocated to meet the Borough’s development needs for the next 30 years.

The allocation of the site in the SHLP presents a unique opportunity to deliver sensitive Green Belt release and provide much-needed market and affordable housing for the Borough of St. Helens. The site is highly sustainable due to its proximity to the existing urban area and the associated services, facilities and transport links within it.

Seddon is keen to ensure that the proposed development is informed by collaborative dialogue between key stakeholders, including the Council and the local community. Doing so will enable the development of a high-quality housing scheme that respects the character of the area and the environment and offers a multitude of social and economic benefits. In addition, the Land at Chapel Lane can provide unique green infrastructure enhancements such as providing public access to the existing woodland and heritage assets and enhancing access to the Wider Bold Forest Park and leisure opportunities.

Given the site’s favourable position directly adjacent to the existing urban area, the development of the site for housing would not prevent the Green Belt from achieving its purpose and functions in this location. Furthermore, this is a logical extension of the built up area in this location given the consented site immediately to the north is now being developed for housing.



Looking north-east from the centre of the site.



Looking south along Chapel Lane.



Looking east from western part of the site.

| SECTION 2

LAND AT
CHAPEL LANE AND
ITS CONTEXT

SECTION 2

LAND AT CHAPEL LANE AND ITS CONTEXT

The Land at Chapel Lane is wholly sustainable and represents a logical and natural extension to the existing built up urban area of Sutton Manor. It comprises agricultural land that lies to the east of Chapel Lane and to the south of Walkers Lane.

The Land at Chapel Lane is located immediately to the south-west of Sutton Manor and to the south of Lea Green Business Park.

Site Description

The Land at Chapel Lane extends to approximately 7.8 hectares and comprises arable farmland separated by an extensive area of mature woodland at the south-west of the site which links to a further area of vegetation enclosing the east of the site. The site boundaries comprise post and barbed wire fencing with some dispersed trees and hedgerows. The site is naturally contained to the east by the sloped land and vegetation between an existing drain and the Pendlebury Brook. The site otherwise has a relatively flat topography. There are no buildings or public rights of way (PRoW) located within the site although the remains of the former mushroom buildings associated with former industrial uses are present in the east of the site. These have now been demolished to prevent anti-social behaviour.

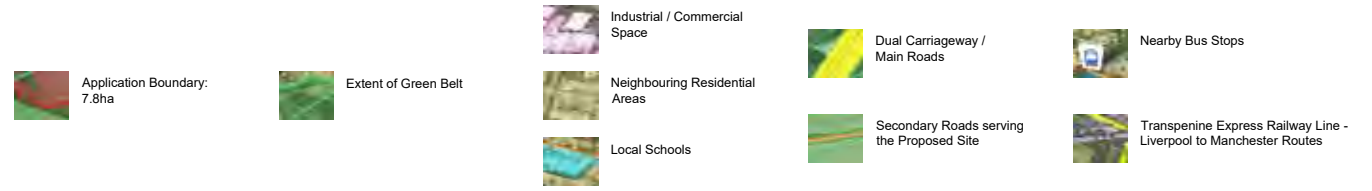
Site Surroundings

The site abuts the south western edge of Sutton Manor in the Metropolitan Borough of St. Helens, Merseyside. The site is bounded to the north and east by residential properties which vary in style and character and include bungalows, modern semi-detached houses and more traditional brick built detached properties. To the north of the site, Lea Green Business Park is accessed from Walkers Lane and comprises several industrial and business units. The site is bounded to the west by Chapel Lane, beyond which is agricultural land. There is further agricultural land, with some dispersed farm dwellings, to the south of the site. The Pendlebury Brook flows along but outside the eastern and southern site boundaries, apart from a small section in the south-east corner of the site that abuts the brook.

The Land at Chapel Lane forms part of the Bold Forest Park which extends to the south and includes leisure opportunities such as the Sutton Manor woodland and “The Dream.”

The Land at Chapel Lane and its surroundings provide a unique opportunity to deliver much needed affordable and market housing in a green and picturesque setting whilst also making a contribution as part of the Bold Forest Park.

FIGURE 2
WIDER SITE CONTEXT PLAN



Landscape Character

The Landscape Character Assessment (LCA) for St. Helen's Borough was published in 2006 and is a tool for the Council to help ensure that all landscapes are effectively planned, well designed and effectively managed. The LCA classifies the Borough landscape into distinctive areas and the site is in the 'floodplain farmland' landscape character type and 'Sutton Manor Fringe' landscape character area ("LCA"). The 'Sutton Manor Fringe' is described as a fragmented agricultural landscape that forms an edge with the residential and industrial edges of Sutton Manor to the north. The flat agricultural landscape is characterised by small to medium irregular fields with largely degraded field boundaries. The landscape also includes large industrial components, buildings and former spoil heaps. This contrasts with the network of narrow hedge-lined rural roads and small wooded areas occurring near to the site. The southern residential edge of Sutton Manor is considered to create an abrupt edge with the 'Sutton Manor Fringe'.

The LCA describes the 'Sutton Manor Fringe' as having moderate strength of character and being poor in terms of condition. The LCA's Landscape Strategy recommends that the landscape character of the 'Sutton Manor Fringe' is restored and that landscape structure is enhanced along the existing hard urban edges. The Landscape Strategy considers there to be opportunity for small-scale development to improve the existing urban edge.

The proposed Masterplan for the site provides an opportunity to respond to the LCA's recommendations by improving the existing abrupt edge of Sutton Manor. The Masterplan proposals could contribute to the restoration of landscape character with wooded edges and a central tree lined 'avenue'. Furthermore, the existing wooded area would be retained.

Views

General visibility of the 'Sutton Manor Fringe' is limited by level topography, the vegetated edges to field boundaries and road infrastructure and the presence of small wooded areas, particularly on the fringes of Sutton Manor.

The Land at Chapel Lane is contained by existing development to the north and by vegetation to the south and west. The Pendlebury Brook and sloping vegetated land between it and the eastern edge of the site visually contain the site. This limited visibility of the site is consistent with the 'Sutton Manor Fringe'. In terms of public views towards the site, these are limited to Chapel Lane, Bell Lane and Wordsworth Avenue (cul-de-sac). Views from Chapel Lane towards the northern part of the site are partly interrupted by the mature trees next to the road. There are some open views of the northern part of the site from Wordsworth Avenue. Woodland and a tall hedgerow screen views from Chapel Lane and Bell Lane towards the southern part of the site. Private views towards the site are limited to views from the front elevations of properties on Wordsworth Avenue and rear views from properties on Walkers Lane.



Looking from site towards Walkers Lane and existing residential area to the north.



Looking south along Chapel Lane towards proposed site entrance.



Looking towards woodland from the south.



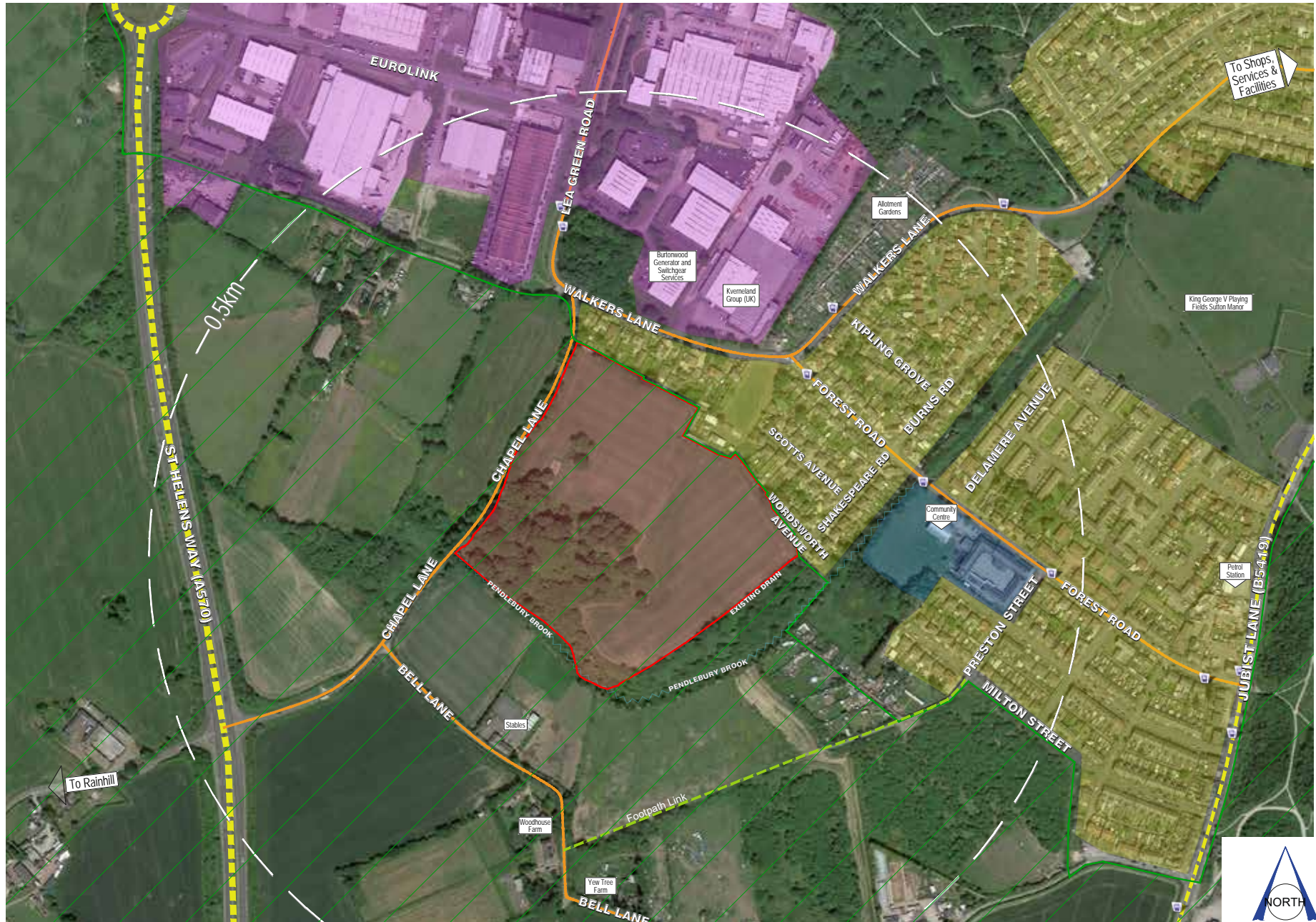
Looking east from proposed site access across the site.

FIGURE 3

PLAN SHOWING DETAILED SITE CONTEXT

KEY

-  Application Boundary: 7.8ha
-  Extent of Green Belt
-  Industrial / Commercial Space
-  Neighbouring Residential Areas
-  Local Schools
-  Dual Carriageway / Main Roads
-  Secondary Roads serving the Proposed Site
-  Nearby Bus Stops



| SECTION 3

**CASE FOR
GREEN BELT
RELEASE**

SECTION 3

CASE FOR GREEN BELT RELEASE

Summary of Planning Policy/Guidance

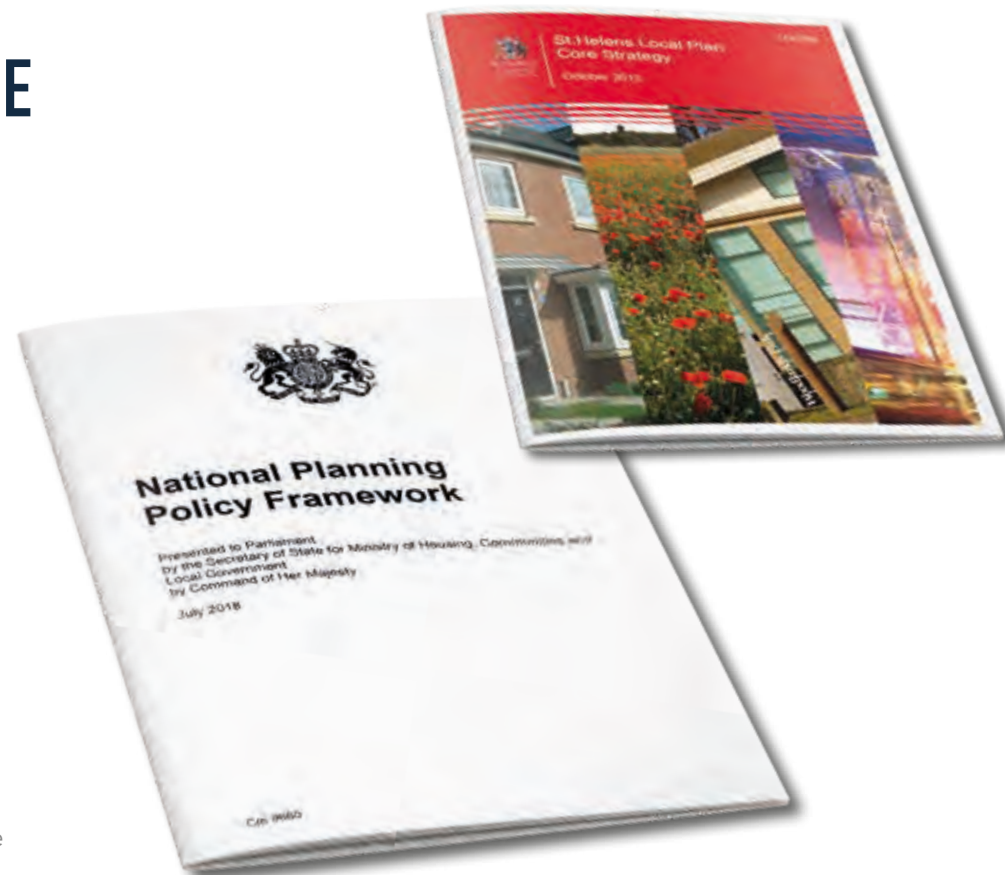
National Planning Guidance

In July 2018, The Government published a revised National Planning Policy Framework (“NPPF”) which replaces the previous guidance published in 2012 and provides the overarching planning framework for England. Central to the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking (Paragraph 11). The NPPF also seeks to boost the supply of housing and requires local authorities to plan positively for objectively assessed needs and maintain a sufficient supply of housing land.

Paragraph 136 of the NPPF states that once the general extent of a Green Belt has been approved, it should only be altered in ‘exceptional circumstances’ through the plan-making process and that the amended Green Belt boundary should be “capable of enduring beyond the plan period”. In the case of St. Helens, there are exceptional circumstances which justify alteration to the Green Belt boundary and the site at Chapel Lane offers an opportunity to release Green Belt in a sensitive manner, without harming its purposes and functions, as set out at paragraph 134 of the NPPF.

Paragraph 8 of the NPPF sets out that sustainable development has three overarching objectives: economic, social and environmental. The proposed development would accord with each of these objectives, contributing to building a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities and continuing to protect and enhance the natural, built and historic environment.

Sustainable transport is another important theme within the NPPF (Paragraphs 102-111); and has a critical role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The site offers a highly sustainable location on the edge of the existing built up urban area and has access to high quality public transport facilities. Other vital community facilities including shops, schools and parks are also within walking distance.



Chapter 5 of the NPPF sets out how local authorities should boost significantly the supply of housing in order to deliver sufficient supply of homes. The Land at Chapel Lane represents a deliverable site that is available, achievable and viable and its development with up to 120 homes would boost the supply of housing in the Borough.

Chapter 15 of the NPPF highlights how the planning system should contribute to and enhance the natural and local environment. The Land at Chapel Lane does not have particularly high environmental or amenity value and its development for housing would not have any adverse impact upon valued and important landscapes or biodiversity and geodiversity. Furthermore, there are opportunities to provide ecological enhancements and connect the green spaces on the site to surrounding green infrastructure, including the Bold Forest Park.

Development Plan

The current Development Plan for the Land at Chapel Lane comprises:

- The Core Strategy Local Plan (adopted October 2012);
- Saved Policies of the 1998 Unitary Development Plan;
- The Joint Merseyside and Halton Waste Local Plan (adopted July 2013); and,
- The Bold Forest Park Area Action Plan (adopted July 2017).

The Core Strategy (“CS”) established the exceptional circumstances to release Green Belt land 2022 onwards (i.e. in years 11-15 of the CS plan period) to meet the longer-term housing needs of St. Helens.

The CS only allows for a strategic review of the Green Belt following evidence base work at a sub-regional level. This was largely reflective of the Regional Spatial Strategy (“RSS”) which was in force at the time of adoption. The RSS has now been revoked and therefore its policies, and those reflective of them are out-of-date. In any case, a sub-regional Green Belt Review has not taken place and instead other authorities (e.g. Halton, Knowsley and Sefton) have undertaken their own local Green Belt reviews.

In July 2013, as part of the next stage of preparation of a local plan following the adoption of the Core Strategy, SHMBC published its Allocations and Sustainable Development Local Plan (“ASDLP”) Scoping Document, which included a methodology for a Green Belt Review. The Scoping Document set out that 53.3ha of Green Belt land was required for employment, and 299ha of Green Belt land was required for housing. The total draft indicative Green Belt land requirement was therefore 352.3ha which included 5 years’ worth of safeguarded land beyond the CS period.

However, the Draft Mid-Mersey SHMA (October 2015) (“SHMA”) and St. Helens Employment Land Needs Study 2015 (“ELNS”) found that the Borough’s objectively assessed needs (“OAN”) for housing and employment land are significantly higher than those set out in the CS. The Council received legal advice that if the ASDLP were to be pursued, there was a significant risk that it would be open to legal challenge or would not be found sound at the examination stage.

At the meeting of the SHMBC Cabinet meeting on 18th November 2015, the decision was made to abandon the preparation of the ASDLP and begin preparing a new Local Plan for St. Helens.

The Council therefore began preparing a new local plan to plan for significantly higher levels of economic growth than currently supported under the existing Core Strategy. A consultation into the scope of the St. Helens Local Plan (“SHLP”) ran for six weeks between January and March 2016 and a Preferred Options consultation ran for eight weeks between December 2016 and January 2017.

The Need for Housing Land and Exceptional Circumstances

In the SHLP 2018-2033 Preferred Options document (December 2016), SHMBC sets out its preferred spatial strategy for meeting development needs including how the Borough’s housing and employment targets will be met (Policy LPA02).

Policy LP04 and LP05 set out the housing and employment targets for the Borough respectively and allocate a minimum of 306 ha of employment land up to 2038 and a minimum of 10,830 net additional dwellings to 2033 in the Borough. This equates to an indicative annual average of 570 dwellings.

Given the need to accommodate an increased amount of housing and employment land in the Green Belt and sooner than the Core Strategy envisages, SHMBC considers that exceptional circumstances exist for targeted release of Green Belt land in order to meet identified needs. The SHLP will therefore remove land from the Green Belt and allocate for development to enable the housing and employment land targets to be met in full over the plan period. Furthermore, the SHLP will identify safeguarded land to be removed from the Green Belt to meet housing and employment development needs for the following 15 years in order to establish a robust Green Belt boundary that will endure beyond the plan period and accord with the NPPF.

Five Purposes of the Green Belt

Paragraph 134 of the NPPF sets out five purposes of the Green Belt. The development of the Land at Chapel Lane for residential development would not prevent the Green Belt from functioning effectively against these five purposes, as demonstrated on the following pages.



Looking towards eastern boundary from centre of site. The vegetation and sloped ground between the site and the Pendlebury Brook create a strong boundary which contains the site physically and visually.



Looking north from the centre of the site.

To Check the Unrestricted Sprawl of Large Built-up Areas

The site forms a logical extension to the existing urban area and would provide for the natural expansion of the settlement. The site is bounded to the north by residential properties. Chapel Lane forms a strong, permanent defensible boundary to the west of the site and the area of woodland to the south of the site would be retained as part of the development, providing a strong, permanent and long term defensible boundary to prevent encroachment into the Green Belt to the south. The Pendlebury Brook, drain and sloping vegetated ground inbetween provide a strong physical boundary to the east of the site (see image above).

The Land at Chapel Lane has defensible boundaries on all sides and would form a natural extension to the existing urban area. As such, the site is not required to check the unrestricted sprawl of the existing built-up area.

To Prevent Neighbouring Towns from Merging into One Another

The removal of the site from the Green Belt would not reduce the separation distances between the built up urban area and the nearest neighbouring settlement of Rainhill. The resultant gap between the site and Rainhill would be around 760m, which is further than the current narrowest separation distance of 685m between the two areas.

Development of the site would not result in the merging of neighbouring towns and would maintain the functions and separation of the Green Belt in this location. Furthermore, the two areas are physically separated by the St. Helens Linkway Road which is a strong, permanent defensible boundary.

To Assist in Safeguarding the Countryside from Encroachment

The Land at Chapel Lane is well related to the existing urban area and benefits from strong existing boundaries in all directions. Whilst a limited amount of encroachment into the countryside is inevitable if St. Helens is to meet its long-term

housing needs through Green Belt release, developing this site will be such that any further encroachment into the countryside would be prevented.

The sensitive development of the site will not affect the purpose of safeguarding the countryside from encroachment in this location.

To Preserve the Setting and Special Character of Historic Towns

The sensitive development of the site would not impact on the character or setting of any Listed Buildings or Conservation Areas. St. Helens is not a nationally recognised historic town and there are none within the vicinity of the site.

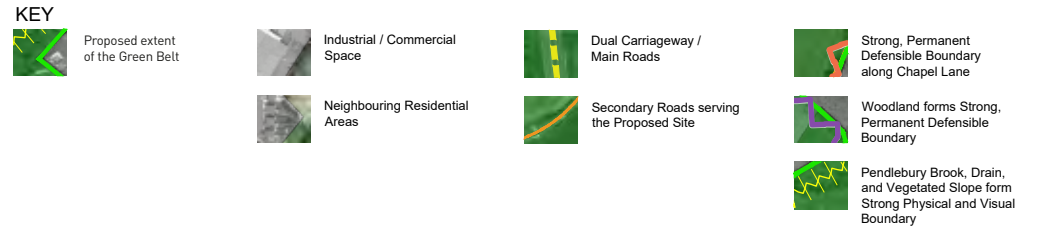
The removal of the site from the Green Belt does not affect the purpose of preserving the setting and special character of a historic town.

To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and other Urban Land

The Council have acknowledged in the St. Helens Core Strategy (2012) and the SHLP 2018-2033 Preferred Options document that was consulted on in December 2016 that the supply of deliverable brownfield sites is not sufficient and, consequently, Green Belt release is required to meet the Borough's housing needs over the plan period. As such, all sites in the Green Belt should be considered equally and neutrally when assessed against this purpose.

The release of the Land at Chapel Lane from the Green Belt and allocation for housing development would not prevent the recycling of derelict land and other urban land because insufficient brownfield sites are available to meet the future housing needs of the Borough. Furthermore, the fact that the former Pilkington Glass site is being developed relatively close by, indicates that derelict land, where available and suitable will indeed be delivered in the borough. The Land at Chapel Lane is well placed to deliver urban regeneration by meeting the housing needs of the borough whilst contributing environmental and ecological benefits.

FIGURE 4
GREEN BELT PLAN



| SECTION 4

THE
ILLUSTRATIVE
MASTERPLAN

SECTION 4

THE ILLUSTRATIVE MASTERPLAN

Seddon has developed a Masterplan for the Land at Chapel Lane which has been carefully designed to respect the environs and provide an acceptable and desirable density of development within the requirements for best reuse of land.

The site has the capacity to deliver up to 120 new, high quality family and affordable homes and the scheme will aim to nestle within its extensive mature landscaped setting, including a mature, tree-lined site frontage along Chapel Lane. Along with providing much-needed housing, the development will deliver multifunctional greenspace and a network of links both within the site and connecting to surrounding areas.

The Vision

“TO CREATE A SAFE AND AESTHETICALLY PLEASING DEVELOPMENT THAT INTEGRATES INTO BOTH THE EXISTING BUILT FORM TO THE NORTH AND RESPECTFULLY SITS WITHIN AND CONNECTS TO THE MATURE LANDSCAPED SETTING, INCLUDING BOLD FOREST PARK. THE LAND AT CHAPEL LANE WILL PROVIDE NEW HOMES OF QUALITY TO MEET LOCAL NEEDS WITH A CHARACTER THAT IS BEFITTING OF THE AREA.”





Constraints, Opportunities and Technical Considerations

The site has been assessed with regards to the constraints and opportunities that arise when considering the site for residential development. The Constraints and Opportunities Plan has been produced to create a visual representation of this assessment.

Seddon has carried out a number of technical assessments (summarised in Appendix 1) which have built on an intimate knowledge of the site and on previous meetings and correspondence between Seddon, the Council and Kingsland Strategic Estates (who previously promoted the site).

As a result, Seddon is entirely confident that the Land at Chapel Lane can deliver the proposed development of up to 120 open market and affordable dwellings.

Highways and Access

A suitable access to the proposed development of Land at Chapel Lane can be achieved without the loss of any of the mature and valued trees along Chapel Lane, also avoiding all root protection zones.

A safe access could be provided via a priority-controlled junction approximately 110 metres to the south of the junction of Chapel Lane and Walkers Lane.

Pedestrian footways will be provided throughout the proposed development, offering comprehensive links around the site, with pedestrian and cycle access to the site provided at 3 points on Chapel Lane, Walkers Lane and Shakespeare Road.

The local highway network has the capacity to accommodate the additional traffic generation that will arise from the proposed development, however, any planning application will ensure that off-site highway improvements will be delivered if deemed to be necessary to mitigate any severe impacts on the transport network.

Ecology and Trees

An ecological appraisal of the site has confirmed that the site does not contain any protected habitats and any impacts from the development on protected species can be fully mitigated through compensation and enhancement measures. The proposed development would not have any significant negative impacts on the Pendlebury Brook Local Wildlife Site which runs close to the eastern and southern boundaries of the site.

There are opportunities to provide ecological enhancements including those associated with the existing woodland, Pendlebury Brook and the existing pond close to the proposed site entrance should be retained together with its surrounding trees. Significant additional tree planting can also be provided as part of the proposed development in accordance with the objectives of the Bold Forest Park Area Action Plan.

An Arboricultural Impact Assessment (AIA) has also been undertaken and demonstrates that the proposed development will retain all trees on the site, including the entirety of the woodland to the south, thus maintaining the long term wider visual public amenity associated with the trees on this site in both the wider landscape and on the Chapel Lane frontage.

Flood Risk and Drainage

The majority of the Land at Chapel Lane is located in Flood Zone 1 with a small proportion of the site immediately adjacent to Pendlebury Brook being located within Flood Zones 2 and 3. The areas of the site within Flood Zones 2 and 3 are not within the area proposed to be developed for housing.

Any surface water drainage from the development will be adequately managed via Sustainable urban Drainage Systems and the potential to provide compensation storage within the site, to alleviate up-stream flooding and drainage issues will be fully investigated.

Archaeology and Heritage

The Land at Chapel Lane has an industrial past and the former sites of Brook Cottage and Brook Works (non-designated heritage assets) are situated within the wooded area in the southern part of the site. There is an opportunity to provide public access to these assets with informative signage for residents and visitors.

An archaeological appraisal has confirmed that there are no Scheduled Monuments, Listed Buildings, Registered Battlefields or Registered Parks and Gardens within the site and the potential for significant prehistoric, Roman or medieval remains to be found within the site boundary is low.

There are some semi-extant buildings relating to former domestic dwellings and a coal smelt works which was constructed during the 19th Century and continued production until the early 20th Century. There are no identified archaeological constraints that would preclude the development of the site.

Topography and Ground Conditions

The site is relatively flat in terms of site levels and there are no topographical constraints to development.

A Phase I and Phase II Geo-Environmental Site Assessment has confirmed that the site can be developed without requirements for any contamination mitigation measures.

The site is located within a Coal Authority Development High Risk Area, but a coal mining risk assessment has confirmed that there are no known coal mine entries within or within 20 metres of the site boundary and the site is not within a surface area that could be affected by past underground mining.

Utilities & Infrastructure

The site is located at the edge of Sutton Manor and adjacent to existing properties and therefore it is anticipated that appropriate services including electricity and broadband will be available. A number of providers have been contacted, including United Utilities and SP Energy Networks to discuss a new supply to this site, and there are no identified utilities constraints to prevent the development of this site.

Air Quality & Noise

The site is not located within any of the four Air Quality Management Areas (AQMA) within the St. Helens Borough. The site will be assessed for potential air quality impacts during the development of the residential proposals however there are no obvious air quality constraints that would preclude the development of the site.

The main source of noise in close proximity to the site would be from traffic using Chapel Lane from which the site is accessed. The St. Helens Linkway runs to the south of the site however it is considered that the distance from the site and the dense woodland to the south of the development area would reduce any impact of noise from the Linkway.

The proposed Masterplan takes into account obvious noise considerations e.g. the retention of mature vegetation along Chapel Lane. The current noise environment would not preclude residential development coming forward in this location.

Landscape & Visual

The proposed development would not harm the wider rural landscape, rather it would provide an opportunity to restore and enhance the landscape character along the existing urban edge through a sensitive, well-designed scheme. Subject to appropriate design, layout and massing at the planning application stage, there are no significant landscape or visual constraints that would preclude the development of the site.

Adverse impacts on views from Chapel Lane could be minimised by setting back development from the western site boundary. New tree planting would be proposed near to this boundary and would filter views from Chapel Lane towards the proposed development.

Dwellings could be orientated towards Chapel Lane to integrate with the existing public realm and create a suitable arrangement of development behind the mature tree-lined frontage.

Setting back development on the northern, eastern and southern boundaries would enable the provision of landscaped spaces with tree planting in keeping with local character and aiming to mitigate the impact of views from the wider area towards the site;

FIGURE 5
CONSTRAINTS AND OPPORTUNITIES PLAN



Surrounding Development

The Illustrative Masterplan has taken into account the site's relationship with surrounding development, including:

- Development to the north off Walkers Lane and the need to consider adequate separation distances;
- Planning permissions P/2016/0422/OUP and P/2017/0772/RES directly to the north of the site on Walkers Lane. The approved scheme is therefore included for context on the illustrative masterplan as development is underway;
- Existing development off Scott Avenue with large gardens backs onto the development;
- Existing development off Wordsworth Avenue with dwellings facing south-west onto the proposed development. This frontage has an element of landscaped screening and Wordsworth Avenue itself has the potential to allow a pedestrian linkage together with an Emergency Access Route if required;
- The south-east site boundary abuts open paddock land with trees and vegetation filling a large extent leading up to the existing off-site watercourse (Pendlebury Brook).

Greenspace and connections

The Land at Chapel Lane sits within a mature landscape and extensive network of greenspaces, including the Bold Forest Park. This presents an opportunity to create a development of attractive dwellings set within an attractive on-site greenspace network and connecting to wider functional greenspace network.

This attractive greenspace network could:

- Open up the existing woodland within the site so that it is fully accessible to the public, with attractive woodland routes and informative and educational signage and wayfinding;
- Provide a link from the Land at Chapel Lane to connect to a green route running within the Council land alongside the Pendlebury Brook between the site and the King George V playing fields to the north and through to the Bold Forest Park;
- Establish a linear green space and footpath running through the site to connect the existing woodland to residential areas to the north;
- Accommodate significant additional tree planting;
- Provide public access to the identified heritage assets within the site.



Design Principles

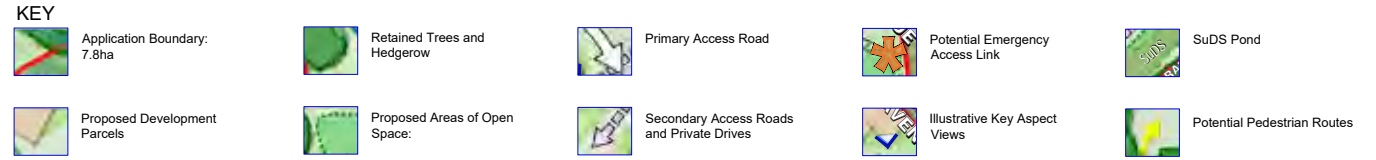
The constraints and opportunities analysis has resulted in the following design principles which the Illustrative Masterplan seeks to embrace:

- Create an attractive development that sensitively nestles in the wider landscape and network of greenspaces;
- Create an attractive, multifunctional greenspace network with the site which facilitates public access to the existing woodland and heritage assets within the site and provides connections through to the wider greenspace network and Bold Forest Park;
- Complement the character and grain of the surrounding area through appropriate development densities, street scenes and housing types and respect the amenity of existing residents;
- Create strong pedestrian movement through the site to promote access to sustainable transport, services and facilities;
- Retain the tree-lined approach along Chapel Lane; and,
- Provide an attractive edge to the development which will become an interface and durable boundary between the urban area and the open farmland beyond.

Illustrative Masterplan

The Illustrative Masterplan has been produced to show how the site could deliver a high-quality scheme that fulfils the Vision and embraces the design principles, providing an much needed family and affordable dwellings to contribute to the Borough's housing needs.

FIGURE 6
ILLUSTRATIVE MASTERPLAN



| SECTION 5

**SUITABILITY
AND
DELIVERABILITY
OF THE SITE**

SECTION 5

SUITABILITY AND DELIVERABILITY OF THE SITE

The site represents a highly sustainable solution to meeting St Helen's housing needs in accordance with Government guidance and the NPPF. The site will perform a positive economic, social and environmental role and meet the definition of sustainable development.

Location and Accessibility

The site is sustainably located in proximity to a range of local facilities and services. A distance of 1km is widely regarded as an acceptable walking distance to local services with 2km being considered acceptable for commuting. Within 1km of the centre of the site there are a number of local level services and facilities, which are very conveniently located for access from the site including employment and leisure units at Lea Green Business Park to the north of Walkers Lane, four convenience stores (including one at a petrol filling station); two hot food takeaways; allotments (located to the west of Walkers Lane); and access to a range of 'green spaces' including the Sutton Manor Woodland (the former Sutton Colliery site) to the east of the site.

There is a further range of services and facilities which are located just outside the 1km catchment of the site. These include the Four Acre Shopping Centre (incorporating a large convenience store, pharmacy and other retail units), Chester Lane Library, the Beefeater Mickle Head Green public house and restaurant and the Premier Inn St. Helens South hotel.

The site is well served by the existing public transport network with bus stops located in direct proximity to the site on Walkers Lane to the north and on Forest Road to the north-east, which are approximately 150 metres and 190 metres from the site respectively. There are a number of services which utilise these stops including:

- Route 30 Sutton Manor – St. Helens – Chain Lane. This route operates three services per hour (two per hour in the evenings and Sundays);

- Route 32 Sutton Manor – St. Helens – Clinkham Wood: This route operates an hourly service (evenings and Sundays only); and,
- Route 920 Haydock Industrial Estate – St. Helens Bus Station: This route operates two services per day.

The nearest railway station is Lea Green which is located approximately 2km from the site. The station features a large car park with space for 190 vehicles along with cycle parking. The station also enables interchange with both buses and taxis. Services from Lea Green provide access to Liverpool and Manchester with journey times of approximately 30 minutes and 40 minutes respectively.

Based on a standard 5km cycle catchment, a range of employment, retail and leisure opportunities are available. Walkers Lane, Chapel Lane and Forest Lane in the vicinity of the site are highlighted in St. Helens Council's cycle maps as suggested cycle routes. These provide connections to other cycle routes in the area including Lea Green Station via on-road, signed routes and other off-road routes including access to Lea Green Business Park to the north and Sutton Manor Woodland to the east.

The A570 St. Helens Linkway offers good vehicular access to the site and links to the strategic road network (M62) to the south via Chapel Lane. Wide pavements with dipped kerbs on Walkers Lane and Chapel Lane provide safe pedestrian access to the site.

Overall, the site is sustainably located and offers residents the opportunities to use sustainable modes of transport to access local services, facilities and employment opportunities.

FIGURE 7
PEDESTRIAN CATCHMENT

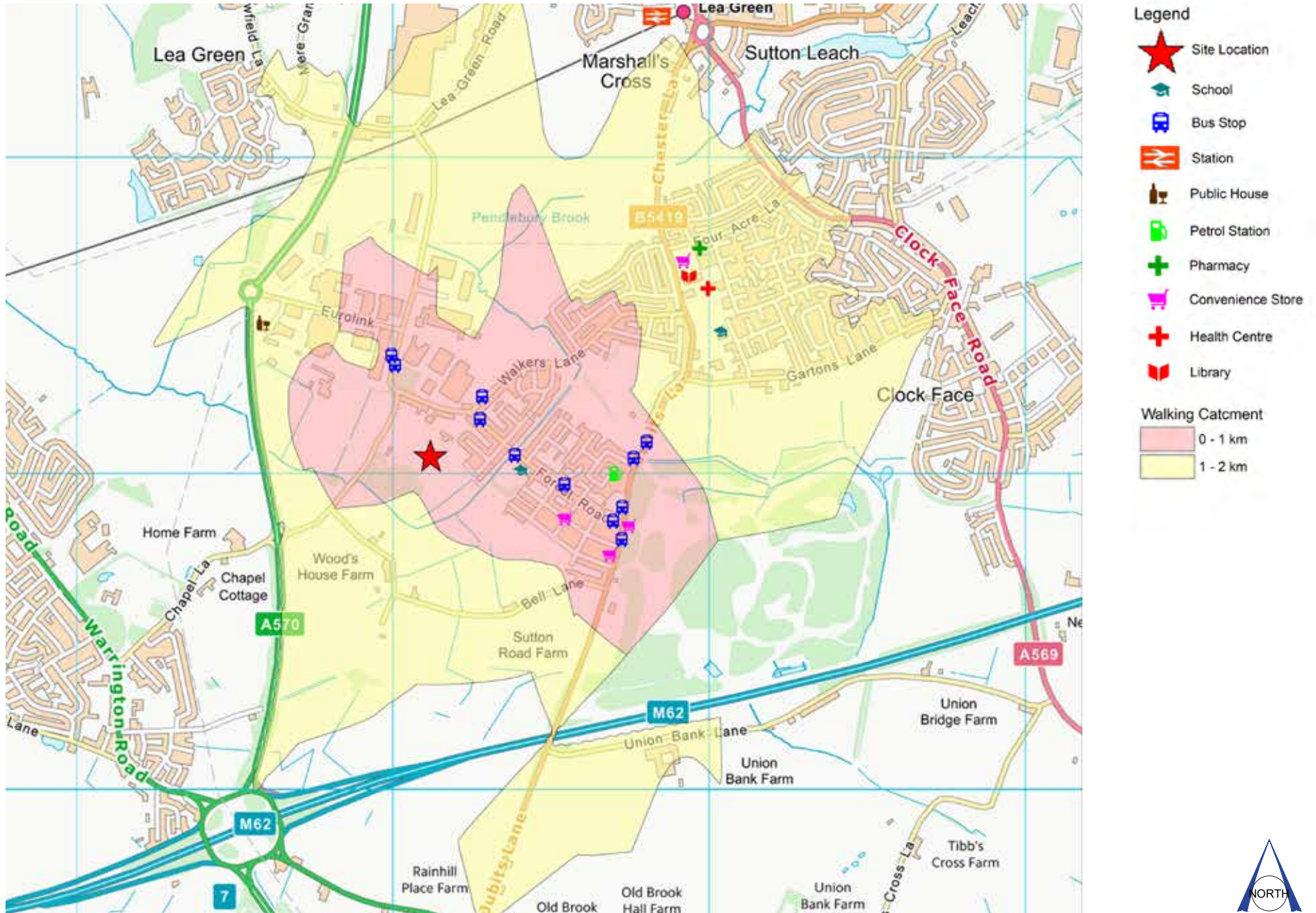
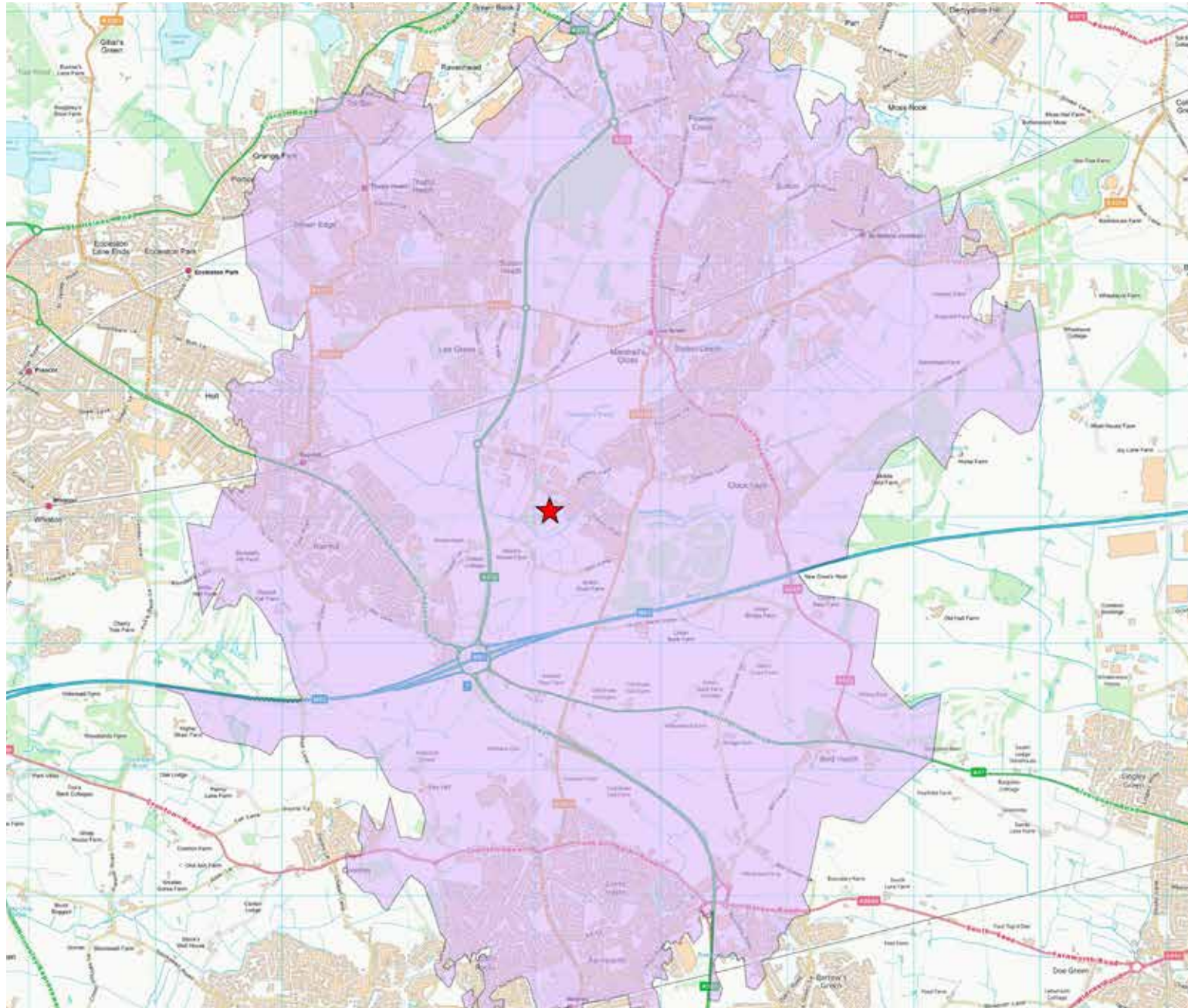


FIGURE 8
CYCLING CATCHMENT



Legend
★ Site Location
Cycling Catchment:
0 - 5 km





Nearest bus stop on Lea Green Road.



King George V Playing Fields

Community Facilities

A number of schools are located within 2km of the site, including: Sutton Community Manor Primary School (0.3km), St Theresa's Primary School (1km), and Rainhill High School (1.1km). There are a number of other primary and secondary schools within the local areas of Rainhill to the west and Sutton to the north. Fourways Childrens Centre and Day Care Nursery is located approximately 1km to the north east of the site. Little Angels Pre-School is located approximately 1.7km from the site.

The nearest pharmacy is located approximately 1km to the north east of the site. The nearest doctors' surgery is the Four Acre Health Centre in Clock Face (1.1km). The nearest hospitals are Whiston Hospital to the east and St. Helens Hospital to the north which are located 3.3km and 3.1km from the site respectively. Bold Veterinary Clinic is located approximately 1.7km from the site in Sutton Leach.

A number of community and recreational facilities are available in proximity to the site that could be utilised by future residents including the King George V playing fields, located approximately 0.6km to the east, which include a children's playground and a number of sports pitches. The Shining Lights Community Centre, located approximately 0.2km to the east of the site offers indoor sports, arts and crafts and holiday club for children. The woodland on the site could provide a fantastic facility for the Forest School associated with the Shining Lights Community Centre. Sutton Manor Woodland, located approximately 1km to the east of the site offers an extensive network of trails suitable for walking and cycling and includes a piece of public art known as the 'Dream' sculpture.

Economic Objective

The development of the Land at Chapel Lane will contribute to building a strong and competitive economy and SHMBC has committed to pursuing economic growth through the SHLP.

A development of up to 120 family and affordable homes will lead to significant job creation through the construction period, both directly at the site, and indirectly through spinoff jobs created in the local construction industry and additional spending on local services and facilities.

Housing delivery will also provide fiscal benefits for the Council in terms of additional monies for the Council through Council Tax and New Homes Bonus payments, and will lead to increased expenditure in the local economy, directly through the investment during the construction period, and later through first occupancy expenditure and other ongoing expenditure benefits to the Borough's economy, from the new residents of 120 new family dwellings.

Housing supply is important in the local labour market as it promotes local economic competitiveness. A shortage of homes or lack of affordability can create a barrier to people accessing employment opportunities or result in the requirement to commute which results in adverse transport and environmental impacts.

Social Objective

The social role of sustainable development is to support a strong and healthy community. The site is draft allocated for housing and it is considered that the site can provide a development of up to 120 family and affordable homes which will provide:

- A range of house types and sizes for the open market to meet the needs of the Borough;
- Affordable housing provision in line with the Borough's requirements. Seddon is in advanced discussions with the Halton Housing Trust (Registered Provider) to deliver the affordable element on this site;
- A network of multifunctional and attractive green space. The existing woodland within the site will be opened up to the public to create a valuable and attractive natural asset for the local community. The development of the Land at Chapel Lane could provide 3.5ha of open space and publicly accessible green infrastructure; and,
- Public access to the non designated heritage sites (Brooks Cottage and Brooks Works) will be provided together with information for residents and visitors. The form and context of this information can be agreed with the local community.



Seddon And Their Role in the Community

Seddon is committed to providing employment and skills opportunities across a range of trades and support services, promoting careers in construction, recruiting apprentices

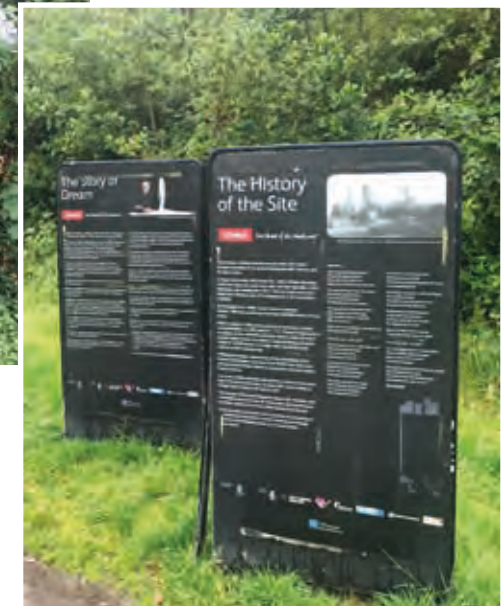
and working with the supply chain to help develop their businesses. Seddon seeks to address identified social needs and empower communities to drive regeneration by engaging with local schools, supporting local charities or groups and providing training opportunities for local people. To ensure a positive experience, Seddon carries out early intervention with neighbours and maintain constant communication throughout each project.

Seddon has a dedicated Social Value team to deliver on social value commitments and ensure that each development contributes to the creation of thriving and diverse neighbourhoods that are tailored to local needs. The Social Value team, who already have established relationships with education, employment and training providers, are committed to strategically plan, identify and engage with stakeholders to implement initiatives. This will have a major impact on the drive and ability to deliver beyond basic contract terms and secure wider benefits for communities.

Environmental Objective

A key aspect of the environmental objective of sustainable development is protecting and enhancing the natural, built and historic environment, including making effective use of land and helping to improve biodiversity. In this context the proposed development will:

- Nestle sensitively within the surrounding landscape and green space network;
- Retain all trees within the site and open up and enhance the existing woodland into a publicly accessible, natural, local asset;
- Provide access to, and protect the heritage assets within the site;
- Facilitate ecological enhancements within the green space network within and surrounding the site; and,
- Contribute to meeting the objectives of the Bold Forest Park, including enhanced access to leisure opportunities.



Deliverability

The site is a suitable area for housing as there are no physical, technical or environmental constraints preventing its development.

The NPPF requires Local Planning Authorities to maintain delivery of housing land to meet their housing targets. To be considered deliverable the site should:

Be Available:

A site is considered available when there is confidence that there are no legal or ownership problems;

Be Suitable:

A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and,

Be Achievable:

A site is considered achievable for development where there is a reasonable prospect achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

Available

Seddon has secured a legal agreement with the landowner of the site. The site is therefore in control of a major housing developer and can be developed to provide up to 120 dwellings to meet both the open and affordable market needs of the Borough.

If the site is to be successfully allocated and removed from the Green Belt, Seddon will seek to develop the site immediately, subject to planning, and doing so would contribute to the Borough's 5-year housing land supply.

The site is therefore considered available in the context of the NPPF.

Suitable

The site is suitable for residential development for the following reasons:

- It can be developed immediately following its allocation and removal from the Green Belt;
- It will form a natural extension to the established area of Sutton;
- There are no identified environmental constraints which would prevent the development of the site for up to 120 dwellings;
- Development could utilise the existing infrastructure of the surrounding area and there are no drainage or utilities constraints which could prevent the site coming forward;
- A satisfactory access from Chapel Lane can be accommodated;
- The site is situated within a local highway network which has the capacity to accommodate these additional dwellings;
- The development will deliver new open space for use by new and existing residents; and,
- The site is sustainably located and close to existing bus stops and local services and facilities.

The site is therefore considered suitable in the context of the NPPF.

Achievable

The site has been fully assessed in terms of its potential constraints which illustrates that the delivery of the site is achievable and deliverable and a team of technical consultants has been appointed to support the delivery of this site moving forward. Where technical constraints are identified, Seddon will provide appropriate mitigation and invest in the site to ensure delivery.

Seddon have undertaken a viability assessment of the site including land values, market demand and potential sales within the Borough. On this basis, Seddon can confirm that this site is economically viable and is therefore achievable in the context of the NPPF.

The site is therefore considered achievable in the context of the NPPF.

| SECTION 6

CONCLUSIONS

SECTION 6 CONCLUSIONS

This Development Statement sets out the case for the removal of the site from the Green Belt and its allocation for residential development through the new St. Helens Local Plan. The site presents an opportunity to deliver approximately 120 new family and affordable dwellings of the appropriate type, size and tenure to meet the future housing needs of St. Helens without undermining the purposes of the Green Belt or adversely impacting upon the environment.

Development of the Land at Chapel Lane also presents a unique opportunity to provide a network of multifunctional green spaces, ecological enhancements and linkages through to the Bold Forest Park (helping to meet the objectives of the Bold Forest Park AAP).



This Development Statement demonstrates that the Land at Chapel Lane:

- Can support the objectives of the Bold Forest Park Area Action Plan by improving connectivity to the wider park, enhancing the landscape through additional tree planting, contributing to ecological enhancements and protecting heritage assets;
- Represents a logical and natural extension to the existing urban area that has strong physical boundaries, is well-contained and does not contribute significantly to the five purposes of the Green Belt;
- Is sustainably located on the edge of the Sutton Manor urban area and is within proximity to a wide range of local-level services and facilities including high-quality public transport links;
- Is entirely suitable, achievable and deliverable for a residential development in

accordance with the NPPF; and will deliver a mix of housing types, including both market and affordable homes to meet local needs;

- Can accommodate a high quality residential-led development that nestles within the surrounding landscape and green space network;
- Will provide high levels of connectivity and permeability within the site and the surrounding area. The development will also retain the existing woodland and open it up for public access;
- Will generate significant material social and economic benefits, by stimulating economic investment and job creation and providing housing choice; and,
- Has no identified technical or environmental constraints that will prevent its delivery.



| APPENDIX 1

ENVIRONMENTAL CONSIDERATIONS

I APPENDIX 1 – ENVIRONMENTAL CONSIDERATIONS

Introduction

Building on previous feedback from key consultants Seddon has carried out several technical assessments of the site which have not identified any constraints that would preclude development of the Land at Chapel Lane.

Ecology and Trees

The development site contains arable land, amenity grassland, woodland, some scattered trees and occasional tall ruderal habitats. The main habitats on site are arable land and woodland scrub. There are areas of extensive semi-natural broadleaf woodland and scrub habitat on the southern boundaries of the site. There is a single pond on site and running water (drain) located to the south of the broadleaf woodland.

The site is not subject to any local, regional or international statutory designations. The nearest statutory designated sites are the Thatto Heath Meadows Local Nature Reserve (2.3km north) and the Colliers Moss Common Local Nature Reserve (3.6km north east). The site is located within SSSI Impact Zones for the Mersey Estuary SPA/ RAMSAR sites which are located approximately 7km from the site to the south. Given the significant distance between these designated areas and the site, a sensitively designed development would not adversely affect these designations.

A Preliminary Ecological Appraisal, undertaken by Amenity Tree Care Ltd, has confirmed that the site does not support a habitat (semi-natural broad leaf woodland) protected under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Whilst evidence of some protected species was identified on site, suitable mitigation, compensation and enhancement measures can be implemented to address this. There is a designated Local Wildlife Site (LWS) (non-statutory) located within and close to the boundaries of the site (Pendlebury Brook). However, given that the proposed development seeks to retain the semi-natural broadleaf woodland on the southern boundary, no section 41 habitats or LWS would be lost or impacted by the development.

An Arboricultural Impact Assessment (AIA) has been undertaken by Amenity Tree Care Ltd to assess the impacts of the proposed development in relation to trees. The proposed development will retain all trees on the site, including the entirety of the woodland to the south, thus maintaining the long term wider visual public amenity associated with the trees on this site in both the wider landscape and on the Chapel Lane frontage.

There are no identified ecological or arboricultural constraints that would preclude the development of the site.

Flood Risk

The majority of the site is located in Flood Zone 1 which is defined as having a less than 1 in 1000 years annual probability of flooding and is suitable for residential development. The nearest watercourse, Pendlebury Brook runs through the site between Chapel Lane and Forest Road to the north of the southern parcel. There is a small proportion of the site immediately adjacent to Pendlebury Brook that is located within Flood Zones 2 and 3, however this is not within the area proposed to be developed for housing.

The development of the site will address and mitigate against any flood risk; particularly in relation to surface water drainage. Appropriate standoff distances will be implemented to ensure that the required guidance and legislation is adhered to. It is not anticipated that there are constraints in terms of flooding or drainage which would prevent the development of the site for residential purposes.

Ground Conditions and Coal Mining

A Phase I and Phase II Geo-Environmental Site Assessment has been undertaken by E3P to determine potential contaminated land liabilities and other geotechnical considerations that will be relevant to the proposed development. The report indicates that there are no active or historic landfills located on or within the immediate vicinity of the site and that the site does not present a risk to human health and may be developed without requirements for any contamination mitigation measures.

The site is located within a Coal Authority Development High Risk Area, therefore E3P has also completed a detailed coal mining risk assessment. This report identifies sixteen coal seams underneath the site at substantial depths, however there are no known coal mine entries within or within 20 metres of the site boundary and the site is not within a surface area that could be affected by past underground mining.

On this basis, there are no identified ground conditions constraints that would prevent the development of the site. If deemed to be necessary, detailed investigations into the coal seams present underneath the site will be undertaken as part of any future planning application and appropriate engineering practices adopted during construction to avoid any adverse impacts on safety or human health.

Highways and Access

Professional transport consultant, Vectos, has been appointed to assess the site in relation to highways and access.

Existing vehicular access to the site is via Chapel Lane in the form of a gated access to the existing agricultural land. A pedestrian footway is provided along the eastern edge of Chapel Lane, adjacent to the proposed development site.

Access to the development could be provided from Chapel Lane via a priority-controlled junction. The indicative Masterplan shows this located approximately 110 metres to the south of the junction of Chapel Lane and Walkers Lane. In this vicinity, Chapel Lane has a carriageway of around 5.5 metres in width with a pedestrian footway on the eastern side of the carriageway and is subject to a 30mph speed limit. Furthermore, footways are provided along the remainder of the nearby road network with dropped kerbs at crossing points to facilitate ease of movement. Forest Road, to the north east of the site, is traffic calmed and has a speed limit of 20mph. As such, a safe access to the site would be achieved.

Pedestrian footways will be provided throughout the proposed development, offering comprehensive links around the site, with pedestrian and cycle access to the site provided at 3 points on Chapel Lane, Walkers Lane and Shakespeare Road. This will allow for access both within the site and to adjacent green space to the south of the site.

The local highway network has the capacity to accommodate the additional traffic generation that will arise from the proposed development, however, any planning application will ensure that off-site highways improvements will be delivered if deemed to be necessary to mitigate any severe impacts on the transport network.

Utilities & Infrastructure

The site is located at the edge of Sutton and adjacent to existing properties and therefore it is anticipated that appropriate services including electricity and broadband will be available. A number of providers have been contacted, including United Utilities and SP Energy Networks to discuss a new supply to this site, and there are no identified utilities constraints to prevent the development of this site.

Further work in relation to infrastructure capacity will be undertaken as part of the detailed development of this site.

Landscape & Visual Impact

The site is not subject to any national or local landscape designations and is classified as the 'floodplain farmland' landscape character type. The site is within the 'Sutton Manor Fringe' landscape character area (LCA) which is a fragmented agricultural landscape abutting the residential and industrial edges of the settlement to the north.

Based on the St. Helens Landscape Character Assessment (2006), the 'Sutton Manor Fringe' is considered to have a moderate strength of character however is poor in terms of condition. The proposed development would not harm the wider rural landscape, rather it would provide an opportunity to restore and enhance the landscape character along the existing urban edge through a sensitive, well-designed scheme.

Subject to appropriate design, layout and massing at the planning application stage, there are no significant landscape or visual constraints that would preclude the development of the site.

Archaeology and Heritage

There are no Scheduled Monuments, Listed Buildings, Registered Battlefields or Registered Parks and Gardens within the site. An Archaeological Desk Based Assessment, undertaken by LP Archaeology, indicates that the potential for significant prehistoric, roman or medieval remains to be found within the site boundary is low. The report identifies that the site contains some semi-extant buildings relating to former domestic dwellings and a coal smelt works which was constructed during the 19th Century and continued production until the early 20th Century. Whilst the potential for any archaeology associated with this period is high, the significance is low and there are no identified archaeological constraints that would preclude the development of the site.

Within a 1km radius of the site there is one Scheduled Monument, Micklehead Green moated site which is located approximately 75 metres to the north of the site between Walkers Lane and St Michaels Road. The closest Listed Building to the site is Grade II Listed Woods House Farmhouse located on Bell Lane, approximately 350 metres to the south of the site. The proposed development is not considered to impact the Scheduled Monument or the Listed Building as no upstanding remains are extant for the monument and there is no inter-visibility between the site and either of these Heritage Assets.

Air Quality & Noise

The site is not located within any of the four Air Quality Management Areas (AQMA) within the St. Helens Borough. The site will be assessed for potential air quality impacts during the development of the residential proposals however there are no obvious air quality constraints apparent that would preclude the development of the site.

The main source of noise in close proximity to the site would be from traffic using Chapel Lane from which the site is accessed. The St. Helens Linkway runs to the south of the site however it is considered that the distance from the site and the dense woodland to the south of the development area would reduce any impact of noise from the Linkway. Any potential noise impacts would be addressed as proposals are developed in further detail. The proposed Masterplan takes into account obvious noise considerations e.g. the retention of mature vegetation along Chapel Lane. The current noise environment would not preclude residential development coming forward in this location.

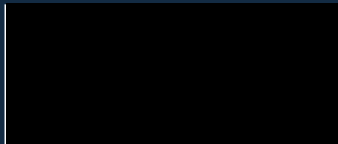
LAND AT CHAPEL LANE ST. HELENS

| DEVELOPMENT STATEMENT

| AUGUST 2018

| CONTACT

Plodder Lane, Edge Fold,
Bolton, BL4 0NN



Seddon

GVA HOW Planning

Appendix II

Letter from LM6 (6th March 2019)



6 March 2019

██████████
Eden Planning
Office 1
Owen House Farm
Wood Lane
Mobberley
WA16 7NY

Unit A1 Villiers Court
Villiers Road
Knowsley Business Park
Knowsley
L34 9ET



Dear ██████████

Re: M62 Employment Site Allocation

LM6 are a Chartered Surveying practice who specialise in the sale, letting, acquisition of warehouse units as well as advising on both strategic and smaller development sites to be brought forward for development.

Having advised on Omega at Warrington c.450 acres, Logistics North at Bolton 250 acres and Kingsway at Rochdale 250 acres being the 3 largest development schemes in the North West in recent years, we are well placed to advise on the North Wests development site pipeline and in particular the M62 & A580 corridors bordering St Helens.

Having reviewed the proposed allocations along the M62, M57 & A580, in our opinion, based on both the current available development sites, current known requirements, the supply and demand, there will be demand for the two subject sites named below well ahead of 2035.

The two main strategic sites earmarked for employment which lie in both the boroughs of Warrington & St Helens are;

- 1EA - Omega South Western Extension, Land north of Finches Plantation, Bold (to meet employment land needs arising in Warrington) 31.22 Ha
- 1ES - Omega North Western Extension, Bold 29.98ha

(1EA) is a proposed employment allocation and 1ES is a safeguarded employment site. We would suggest that the level of demand for industrial land along the M62 is enough to suggest that both the purple sections on the attached document should be allocations now (i.e. upgrading the section north 1ES of the M62 to be an allocation).

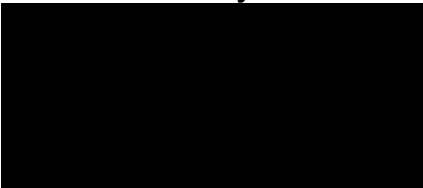
Given the sites proximity to the boundary with Warrington, which is at the heart of 3 national motorways, we would advise that it is crucial to allocate the two subject sites thereby extending Omega.

The internet is playing a big part in warehousing demand and motorway locations will be sought after. Notwithstanding this, Liverpool's deep-sea port will also play a big part on the demand for North West motorway development sites.

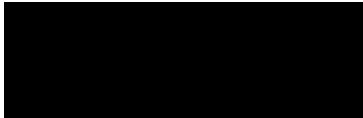
Note there are few strategic pipeline site development opportunities along the M62 with the exception of the sites named above which is why we believe these sites will be required for employment development during the plan period. Note Tritax / DB Symmetry are also exploring a major employment site at the junction of Knowsley & Cronton which will further cater for development demand if required, details of which we are currently looking into.

Should you require anything else at this point then please do not hesitate to contact me.

Yours Sincerely



Phil Morley BSc (Hons) MRICS
Director



Contact Details

Enquiries
Paul Nellist

