



ST HELENS
BOROUGH COUNCIL

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

SITE SELECTION INFORMATION PAPER

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1. Introduction

The St Helens Borough Local Plan Submission Draft (LPSD) (2019) (SD001) allocates a number of sites for both housing and employment to meet identified development needs. Additionally, the Plan proposes to safeguard land for development beyond the end of the Plan period, in accordance with national policy (National Planning Policy Framework, paragraph 139).

Housing

In terms of housing, the LPSD proposes to allocate ten sites to meet identified needs over the Plan period. Six of these sites are proposed to be released from the Green Belt (1HA, 2HA, 4HA, 5HA, 7HA and 8HA). Table 4.5 in the LPSD provides the full list of the proposed housing site allocations.

Further to this, the Plan proposes to safeguard eight areas of land to meet longer terms housing needs well beyond the Plan period. All of the proposed safeguarded land areas are proposed to be removed from the Green Belt. Table 4.8 in the LPSD provides the details of the safeguarded land for housing.

Employment

In terms of employment, the LPSD proposes to allocate eleven sites to meet needs over the Plan period. Eight of these sites are proposed to be released from the Green Belt (1EA, 2EA, 3EA, 4EA, 5EA, 6EA, 7EA and 8EA). Table 4.1 in the LPSD provides the full list of the proposed employment site allocations.

Further to this, the Plan proposes to safeguard two areas of land to meet longer term employment needs well beyond the Plan period (1ES and 2ES). This requires both areas to be removed from the Green Belt. Table 4.7 in the LPSD provides the details of the safeguarded land for employment.

This paper sets out the approach to site selection in the LPSD, explaining the process undertaken and how the evidence has informed the decisions made from a strategic perspective.

It is important to note from the outset that there are two main sources of supply that have been drawn from:

- Land within the existing urban area, and
- Proposals for the expansion of the urban area on sites proposed to be removed from the Green Belt

The primary source is the urban land supply, comprising sites identified as being, in principle, suitable for housing in the SHLAA and / or Brownfield Register. The secondary source is the identification of sites proposed to be released from the Green Belt through the Green Belt Review (2018). The identification of sites through the secondary source, ie. the Green Belt Review, has operated as a 'top up' to ensure sufficient sites are brought forward overall to enable the delivery of the strategy.

2. Site Identification

The Council has undertaken 'Call for Sites' exercises to gain a thorough understanding of the various land interests within the Borough, and valuable information regarding site specific matters and landowner / site promoter intentions. This has been supplemented by the further promotion of sites through at the various consultation stages in the development of this Local Plan. This has in turn informed the sites to be assessed through the preparation of the Local Plan.

With respect to the Green Belt, the Green Belt Review 2018 has assessed the entire extent of the Green Belt in St Helens Borough to get a full view of the overall function of the Green Belt, and to ensure that no areas of Green Belt have been overlooked.

Therefore, the identification of potential development sites has been a thorough and robust process.

Sites identified within the urban area have been assessed through the Strategic Housing Land Availability Assessment (SHLAA), and sites in the Green Belt have been assessed through the Green Belt Review.

3. Assessing the urban land supply

The assessment of the urban land supply has been undertaken in accordance with the National Planning Practice Guidance, section entitled 'housing and economic land availability assessment'.

Section 3 of the SHLAA sets out the methodology used to identify sites and then appraise whether they are 'deliverable', 'developable' or 'non-developable'. The sites were robustly assessed through the SHLAA. The assessments included consideration of a wide range of matters, including (but not limited to): presence of wildlife designations, open space facilities, TPOs, heritage assets, flood zones, site contamination, ground conditions, appropriate access, impact of surrounding uses, hazards (overhead powerlines, pipelines, landfills etc), access to facilities, site ownership, market interest and likely economic viability. It is important to note that all sites have been assessed consistently through the SHLAA process.

Those sites considered deliverable and developable following a thorough assessment through the SHLAA have been included with the housing land supply in the Plan. The SHLAA supply also includes sites within the urban area that have planning permission or are under construction. The Plan allocated those SHLAA sites over 300 units that had not commenced at the time the SHLAA 2017 was published.

4. Assessing the Green Belt potential

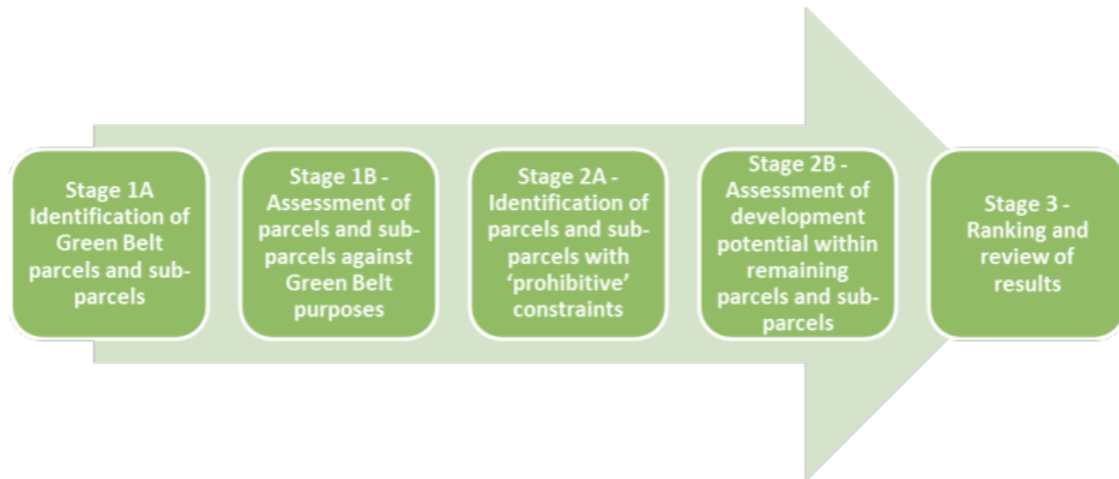
The Council acknowledges that there is an insufficient supply of urban land that can be delivered over the Plan period to meet identified needs. It therefore undertook a review of the Green Belt across the Borough. The Green Belt Review (GBR) 2018 informs the site selection process for the proposed Green Belt Release in the LPSD.

However, it should be noted that the Green Belt assessment methodology has evolved and been refined through the Plan preparation process to ensure it is robust. A summary of the development of the Green Belt Review methodology is provided in Section 3 (paragraphs 3.1-3.3) of the GBR 2018,

and Table 3.1 in this section explains the refinement of the methodology between the 2016 and 2018 versions.

The GBR 2018 followed a clear staged process. This is set out in detail in Section 2 of the document, but can be summarised as follows:

Figure 2: Main stages of the St. Helens Green Belt Review



(source: Green Belt Review 2018, page 12)

Stages 1A and 1B form the core assessment of the identified parcels and sub-parcels against the purposes of the Green Belt. It is worth noting that at Stage 1B, the Review focussed on the first three purposes of the Green Belt referred to in paragraph 134 of the NPPF:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another; and
- To assist in safeguarding the countryside from encroachment.

In relation to purposes 4 and 5 of the Green Belt as set out in the NPPF, paragraphs 213 and 214 of the GBR 2018 explain that the different parcels of the Green Belt could not be reliably differentiated in terms of their contributions to these purposes. Therefore, they were not assessed at Stage 1B.

Parcels or sub-parcels scoring 'high' or 'high+' at this stage were then discounted from further consideration in the assessment. Such an approach reflects the importance of the Green Belt designation and protecting those areas of land that contribute most significantly to the purposes of the Green Belt. There is considered to be no justification to further consider those sites that would have greater harm to the Green Belt in the subsequent stages of the Green Belt Review. There were a very limited number of exceptions to this in relation to sites promoted for employment uses. The reasons for this were explained in the relevant Stage 1B proformas in the GBR 2018.

Stages 2A and 2B then assessed sites initially to understand whether there was a prohibitive constraint present that would mean the site does not have a realistic prospect of being developed (Stage 2A). Any such parcels / sub-parcels were then screened out from further consideration. Those that were not found to have a prohibitive constraint went on to be assessed for their development potential by considering a wide range of constraints, transport accessibility, land ownership and viability for each parcel / sub-parcel, before providing conclusions on the

developability of it. The template proforma showing the detailed considerations made at Stage 2B is provided at Appendix F (SD020). The Stage 2B assessments are then provided in SD021.

Stage 3 then ranked those parcels that had not been discounted by this stage for reasons of high impact on Green Belt purposes or the presence of prohibitive constraints, by using the scores attributed to them for Stages 1B and 2B to provide an overall score. They were then ranked, and the parcels / sub-parcels underwent a final review to identify the sites most suitable for allocation and safeguarding.

The GBR 2018 provides the final decisions to allocate, safeguard or retain sites in the Green Belt and detailed commentary justifying these decisions can be found in Table 5.2 (for employment sites) and Table 5.4 (for housing sites).

As with the SHLAA process, all parcels and sub-parcels identified through the GBR 2018 have been assessed consistently throughout. The assessment has been done in a proportionate way and in a way that acknowledges the importance of the Green Belt purposes, and the importance of identifying sites where the development potential can be realised.

5. Site selection and the wider evidence

Whilst the SHLAA and GBR 2018 have provided the main assessment of the sites, a broad range of evidence has fed into and supported this process. Suitability of the allocation or safeguarding of individual sites has been tested through the Local Plan Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) processes. Comments in relation to these assessments have been included in the commentary of sites in Tables 5.2 (for employment sites) and 5.4 (for housing sites).

In terms of housing sites, the SA considered all sites which had advanced through the Green Belt Review to the Stage 2B assessment. The results of the SA were then fed back into the GBR as part of the evidence to inform the final decisions on site selection. With regard to employment sites, sites that scored 'high' against the purposes of the Green Belt at Stage 1B of the GBR were also tested through the SA as reasonable alternatives.

Transport accessibility and infrastructure provision are also taken into account in the GBR, along with the wider deliverability considerations. Consideration of sites has also taken account of their ability to deliver mitigation to overcome any potential issues identified. Furthermore, all allocated housing sites have been evaluated through the Economic Viability Appraisal (VIA001).

6. Site selection and the spatial strategy

The approach to site selection reflects the Plan's vision, aims and strategic objectives in terms of supporting regeneration and delivering balanced growth. This is reflected in the spatial strategy of the Plan as set out in Policy LPA02, section 3 which states that 'the re-use of previously developed land in Key Settlements will remain a key priority'.

The Council's evidence in relation to housing needs applies to the Borough as a whole rather than individual settlements. The housing market clearly operates on a 'larger than individual settlement'

basis. It is for this reason that once the housing land supply in the urban area is optimised, the distribution of housing growth between settlements is guided to a substantial extent by the availability of the most suitable sites, taking into account impacts on the function of the Green Belt and the deliverability of sites. Notwithstanding this, Figure 4.1 in the LPSD clearly shows a spread of site allocations and housing sites in accordance with the Spatial Strategy.

The Spatial Strategy in the LPSD articulated in Policy LPA02 is clear in this matter by stating:

“1. The sustainable regeneration and growth of St Helens Borough through to 2035 and beyond will be focussed (as far as practicable, having regard to the availability of suitable sites) on the Key Settlements, namely St Helens Core Area; Blackbrook and Haydock; Newton le Willows and Earlestown; Rainford; Billinge; Garswood; and, Rainhill.”

[emphasis added]

Therefore, whilst the Spatial Strategy has influenced the site selection, and indeed the sites selected do accord with it, it has not overridden the importance of selecting sites that have a lesser impact on the purposes of the Green Belt and are considered to be most suitable in terms of their development potential.

7. Employment sites

The employment site selection has followed a similar process to the above with respect to considering the urban land supply, taking all the relevant evidence into account and the use of the GBR as a key tool. With respect to the GBR however, there is a notable difference regarding the need to progress some of the employment options past the Stage 1B assessment of the GBR, notwithstanding the identified Green Belt harms. The detailed reasoning for this is set out in the GBR Stage 1B assessments for the specific sites, but in summary this was required due to the specific site requirements of the identified strategic B8 needs in the evidence base.

A review was undertaken of the remaining sites in the (urban) supply for the Core Strategy to clarify whether any of those sites could contribute to meeting the identified needs in this Plan period. Many sites were no longer available due to their loss to higher value uses, would not be viable or developable for speculative employment without gap funding, or were of poor quality in terms of market attractiveness for various other reasons (contamination, infrastructure issues). However, following this review three sites were identified as deliverable over the Plan period, and able to contribute to meeting identified employment needs, and were therefore allocated in the LPSD (9EA, 10EA and 11EA).

Separately to this, the Council has previously undertaken work in the form of the Allocations Local Plan – Economic Evidence Base Paper 2015 (EMP003), which concluded that none of the sites identified as developable in the evidence base for the Core Strategy for large scale distributions and manufacturing uses now satisfy the criteria now preferred by the market for such uses.

The Employment Needs and Supply Background Paper (SD022) (paragraphs 4.10-4.23) sets out the background to the proposed employment allocations in the LPSD. As set out in the Paper, the evidence indicates a clear need to provide for large scale B8 storage and distribution units. The

Borough has a competitive advantage in this sector related to its location along the M62 and M6 corridors, making it particularly attractive to the market.

Compared to housing, the potential pool of sites to meet the acknowledged employment requirements and could be made readily available to meet those needs is limited. Therefore, to meet identified needs, it is recognised that release from the Green Belt is necessary.

The Green Belt Review 2018 provides an assessment of the potential employment site options (including those proposed to be allocated and safeguarded in the Plan) against the purposes of the Green Belt and an assessment of site deliverability. This has informed the site selection decisions made in respect of the employment sites, as well as any further evidence that has become available since to understand whether the results of the site selection needed updating. However, no changes to the proposed site selection have been considered justified.

8. Conclusion

The selection of sites has been a thorough process that has taken a considerable amount of evidence into account. Generally, the decision to allocate, safeguard or retain a site within the Green Belt is based upon a multitude of factors as set out above, not just one identified constraint. Such decisions are also informed by the identified level of development (housing and employment) to be delivered over the Plan period, and beyond.

The site selection process is therefore one in which a number of factors are balanced, and where planning judgement is required. The Council has undertaken a thorough and robust process in this respect, taking account of all of the available evidence to ensure the most appropriate sites have been selected to ensure an effective and justified Plan that will deliver on the vision, aims and objectives set out.