

## **1. Introduction**

- 1.1 This paper has been prepared in response to action 7 recorded in the Matter 3 session:

*“Produce a note to explain how the Council intends to approach the delivery of compensatory improvements (and consideration of associated main modifications to the Plan).”*

- 1.2 This paper summarises the Council’s approach to providing compensatory improvements to the Green Belt, including where such improvements could be delivered over the Plan period throughout the Borough of St Helens.

- 1.3 This paper briefly summarises:

- the policy context relevant to Green Belt Compensatory Improvements (Section 2);
- the locational opportunities to deliver Green Belt compensatory improvements within St Helens Borough (Section 3); and
- the proposed modifications to St Helens Borough Local Plan (Section 4).

- 1.4 This paper should be read in conjunction with other evidence base documents, including:

- St Helens Council Draft Nature Conservation SPD (October 2020), (SD019)
- Developing the Spatial Strategy Background Paper (October 2020), (SD026)
- Bold Forest Area Action Plan (July 2017), (LOC004)
- The Mersey Forest Plan (2014), (NAT007)
- Liverpool City Region Ecological Network (2015), (NAT006)
- Sankey Catchment Action Plan (2018), (FLO002)

## **2. Policy Context**

- 2.1 This section outlines the policy framework at the national and local level of relevance to compensatory improvements in the Green Belt.

## National

### National Planning Policy Framework (February 2019)

- 2.2 The National Planning Policy Framework (NPPF) 2019 sets out the Government's planning policies for England and how these are expected to be applied.
- 2.3 Chapter 13 highlights the importance of Green Belts, setting out their five purposes, whilst also outlining how Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified (paragraphs 133-137).
- 2.4 Where it has been concluded that Green Belt land release is necessary for development, paragraph 138 states that strategic policy-making authorities should *"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"*.
- 2.5 In addition, NPPF paragraph 141 states *"Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land"*.

### Planning Practice Guidance (PPG): Green Belt (2019)

- 2.6 The Green Belt section (paragraph 002) supports paragraph 138 of the NPPF, stating that policies for compensatory improvements *"may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies"*.
- 2.7 The same PPG paragraph sets out several examples of potential compensatory improvements measures, including;
- *"new or enhanced green infrastructure;*
  - *woodland planting;*
  - *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
  - *improvements to biodiversity, habitat connectivity and natural capital;*
  - *new or enhanced walking and cycle routes; and*

- *improved access to new, enhanced or existing recreational and playing field provision”.*

## Local

### **St Helens Borough Local Plan Submission Draft 2020-2035 (LPSD)**

- 2.8 Whilst the Plan does not make specific reference to the provision of compensatory measures to offset the impact of removing land from the Green Belt, there are a number of policies (and associated reasoned justification) which support the principals of improving the Green Infrastructure network, biodiversity and habitat connectivity, and more generally supporting environmental quality improvements, including through policies LPA02, LPA03, environmentally focussed policies LPA09, LPC05-10 and LPC12, and development management focussed policies LPD01-03 and LPD09.
- 2.9 Notwithstanding the above broader policy framework, the Plan would benefit from a modification to specifically reference the need to provide compensatory measures, and some associated explanation. See section 4 for proposed modification wording.

### **St Helens Council Nature Conservation Supplementary Planning Document (SPD) 2020 (Draft)**

- 2.10 As above, the NPPG provides one example of compensatory improvements as being the improvement of biodiversity. In this context, it is important to note the draft Nature Conservation SPD the Council has prepared. It will provide guidance on how the range of policies in the Local Plan Submission Draft (LPSD) will be implemented, including, but not limited to LPA09, LPC06, LPC07, LPC08 and LPC10.
- 2.11 The SPD will therefore provide part of the policy framework to enable the delivery of compensatory improvements to offset the removal of land from the Green Belt for development.

### **Bold Forest Park Area Action Plan (2017)**

- 2.12 The Bold Forest Park Area Action Plan (BFP AAP) forms part of the development plan for St Helens Borough. It sets out the detailed policies and actions needed to develop and sustain the Bold Forest Park and is to be read alongside the other documents in the Development Plan for the Borough.

- 2.13 The BFP AAP overarching policy BFP1: A Sustainable Forest Park, indicates that environmental sustainability is an important element of the Forest Park vision alongside supporting a number of economic and social objectives. Increasing tree coverage and enhancing biodiversity through integrating wildlife habitats into an ecological habitat in the Forest Park are key issues that the AAP aims to address.
- 2.14 Policy BFP ENV1: Enhancing Landscape Character and BFP ENV2: Ecological Network, both set out a positive approach towards protecting and enhancing the existing natural environment.
- 2.15 Whilst the Local Plan does seek to bring forward some land within the Bold Forest Park to meet identified development needs, a significant amount of the Bold Forest Park area will remain within the Green Belt. Therefore, the AAP provides a vision and a framework through which compensatory measures can be delivered at a strategic scale to offset the release of other Green Belt land proposed for development.

### **3. St Helens Borough Green Belt Compensatory Improvements - Location Opportunities**

- 3.1 From a strategic perspective, St Helens Borough has two strategic areas that are of great importance regarding the delivery of compensatory improvements in the Green Belt, providing a wealth of opportunities to do so. They are:
- Bold Forest Park
  - Sankey Valley Corridor
- 3.2 In addition, it is important to recognise the role of the wider LCR Ecological Network. Nature Improvements Areas (NIA's) are a key part of this network and also provide opportunities to deliver compensatory improvements in the Green Belt. St Helens Borough has two identified NIA's: 1) Knowsley and St Helens Mosslands and 2) the Sankey Valley Corridor.
- 3.3 Apart from the strategic areas, there are many other locations across the Borough where improvements have been delivered and present further opportunities to deliver compensatory improvement measures to offset the release of Green Belt land for development. For example, Local Nature Reserves (LNR) and Local Wildlife Sites (LWS) provide opportunities to deliver compensatory improvements through, for example, improving and supporting habitat management and connectivity of environmental assets.
- 3.4 In recent years, progress has been made through a range of initiatives to improve the environmental quality of the areas listed above and such is

discussed further below. However, it is important to recognise there are opportunities for further improvements to be made, which could be delivered through Green Belt compensatory measures.

- 3.5 A location plan illustrating all of the strategic and localised sites mentioned above can be found in appendix 1. Moreover, detailed plans of these sites are included within either the LPSD or the evidence-based documents supporting the proposed plan. Please refer to Figure 5 included within the Bold Forest Garden Suburb position statement (SD027) for a detailed location plan of the Bold Forest Park. Detailed location plans for all NIA sites are included within appendix 9 of the LPSD. Lastly, all LNR and LWS within St Helens Borough are illustrated on the Local Plan Policies Map.

## **Bold Forest Park**

- 3.6 The area known as Bold Forest Park is situated in the South of St Helens Borough near to the settlements of Bold, Clock Face, Sutton and Rainhill.
- 3.7 As part of the wider development plan for the Borough, an Area Action Plan was adopted in 2017, known as the Bold Forest Park Area Action Plan (BFP AAP). The BFP AAP sets out the detailed policies and actions needed to develop and sustain the Forest Park through the restoration of the former industrial working landscape. It sets out a framework for guiding sustainable development alongside encouraging the enhancement of the natural environment.
- 3.8 One of the main aims of the BFP AAP is to significantly increase tree coverage across the entire Bold Forest Park area, the majority of which is proposed to remain in the Green Belt in the LPSD. St Helens Borough Council have and will continue to work with partnership organisations such as the Mersey Forest to ensure that tree planting remains a constant activity occurring within the Forest Park.
- 3.9 Examples of previous as well as current initiatives within the Bold Forest Park, focussed upon tree planting include:
- the Trees and Climate Initiative,
  - the Urban Tree Challenge and,
  - the Northern Forest.
- 3.10 The above initiatives not only support local policies. Regional strategies are also being successfully implemented, such as those set out within the Mersey Forest Plan (NAT007).

- 3.11 The BFP AAP also has a focus on increasing the visitor economy of the Forest Park, with specific reference to the creation and enhancement of visitor hubs and the associated infrastructure.
- 3.12 It is expected that Green Belt compensatory measures can be secured as part of any future planning permissions on sites removed from the Green Belt to deliver improvements in line with the AAP throughout the Bold Forest Park. It should also be noted that this is a strategic location with a wide catchment and recognition across the Liverpool City Region as such.

### **Sankey Valley Corridor Nature Improvement Area (NIA)**

- 3.13 The Sankey Valley Corridor Nature Improvement Area (NIA) begins in Billinge in the North of St Helens and travels through many settlements including Blackbrook and Newton-Le-Willows through to the Borough's South-East boundary with Warrington. Due to the extensive length of this corridor, access to the natural environment is enabled for many residents and visitors to St Helens Borough.
- 3.14 Within this corridor, a prominent natural asset is the Sankey Valley canal. The Sankey Catchment Action Plan (FLO002), adopted in 2018, provides a framework which will enable enhancements of the aquatic environment as well as the surrounding natural environments located within the catchment area to occur. Furthermore, this plan also supports improvements relating to environmental management practices, and therefore this will contribute positively to improving the overall environmental quality of this NIA.
- 3.15 A primary aim of the catchment plan is to improve the water quality throughout the entire Sankey catchment area. It is acknowledged that the implementation of projects which aim to address issues of flooding will support improvements in water quality whilst also supporting improvements to biodiversity. Resultantly, the Sankey Catchment Action Plan (FLO002) supports the ecological enhancements and management priorities listed in the Sankey Valley Corridor NIA profile (see NAT006, appendix 6 NIA Focus Area 06).
- 3.16 Improvements have occurred along the Sankey Valley corridor in recent years. Funding for active travel schemes through the Sustainable Transport Enhancement Package (STEP) has enabled walking and cycling infrastructure to be improved and extended along the Sankey Valley Canal. Therefore, increasing access to Green Belt land for the residents and visitors of St Helens Borough.
- 3.17 Another example of where improvements within the Sankey Valley Corridor NIA have taken place is at Carr Mill Dam. However, it should be noted that whilst improvements have occurred within this location, they have not been

delivered recently. For example, more than 10-years ago, as part of a Heritage Lottery Funded project, access improvements including footpath surfacing and new signage were delivered.

- 3.18 Resultantly, it is expected that Green Belt compensatory measures can be secured as part of any future planning permissions on sites removed from the Green Belt to deliver environmental quality improvements along the Sankey Valley Corridor NIA.

### **Knowsley and St Helens Mosslands Nature Improvement Area (NIA)**

- 3.19 Located in the North of St Helens close to the settlements of Rainford and Kings Moss are three sites that are contained within the Knowsley and St Helens Mosslands Nature Improvement Area (NIA). There are also two other sites within this NIA in the Borough, one located in Parr and the other in Newton-Le-Willows.
- 3.20 The primary objective of these sites is to protect, restore and enhance the lowland bog and fens habitat that are present at such locations. It is considered that future enhancement of these specific habitats will occur as a result of national biodiversity net gain strategies currently being reviewed as part of the Environmental Bill legislation. They also present opportunities for improvements to be delivered as part of providing Green Belt compensatory measures.

### **Other Locations**

- 3.21 As mentioned previously above, other locations where environmental improvements projects have and will continue to take place include at the many local wildlife sites (LWS) and local nature reserves (LNR) located across St Helens Borough.
- 3.22 Appendix 1 illustrates the extensive distribution of LWS and LNR across the Borough of St Helens. From the plan included within appendix 1, it is evident that many LWS as well as three LNR are situated within the Green Belt. Furthermore, as indicated in appendix 8 of the LPSD, each ward within St Helens contains several LWS, with many ward areas having access to LWS situated within the Green Belt. Resultantly, this provides opportunities for localised projects to occur and environmental improvements to be delivered across the entire Borough of St Helens, including through the mechanism of delivering Green Belt compensatory improvements.

- 3.23 In addition, compensatory improvements could also occur at non-designated sites situated within the Green Belt. For example, initiatives to help alleviate the potential effects associated with flooding events have been implemented within the settlement of King's Moss. Natural flood management solutions such as the creation of debris dams and the introduction of sustainable urban drainage (SUD's) have been implemented to support the 'Slow the Flow' approach adopted as part of the Sankey Catchment Action Plan (FLO002). As a result, environmental quality improvements are not solely seen within the King's Moss settlement, but improvements are evident across a wider area of St Helens Borough.

## 4. Proposed Modifications to the Local Plan

- 4.1 The Council recognises that the proposed Local Plan does not reference the need for Green Belt compensatory improvements following the release of any Green Belt land. As a result, it would be beneficial for a modification, in the form of additional wording, to be included within policy LPA02.
- 4.2 Outlined below is the proposed modification to policy LPA02, section 4:
- "4. 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. Within the remaining areas of Green Belt (shown on the Policies Map) new development shall be regarded as inappropriate unless it falls within one of the exceptions set out in the National Planning Policy Framework (or any successor document). Inappropriate development in the Green Belt shall not be approved except in very special circumstances. **Delivery of compensatory improvement measures within areas remaining in the Green Belt will be required following any release of Green Belt land for development purposes. Details of such improvements will be considered during the development management process and assessed on an individual application basis**".
- 4.3 Additionally, a further modification to the reasoned justification of policy LPA02 is considered necessary. The inclusion of an additional paragraph clarifying the requirement for Green Belt Compensatory Improvement



measures is proposed to follow on from paragraph 4.6.15 of the submitted LPSP along the lines of:

**“In addition, the Council aims to protect and enhance remaining areas of Green Belt by seeking the delivery of compensatory improvement measures. In accordance with paragraph 138 of the NPPF, delivery of compensatory improvement measures will be sought when sites are released from the Green Belt for development as part of this plan. Such measures should enhance the environmental quality and accessibility of the remaining Green Belt land, amongst other improvements. Further guidance is provided within the National Planning Practice Guidance (Green Belt Land).”**

- 4.4 Resultantly, the proposed modifications will provide clarity on the expectations to deliver compensatory improvements to offset the release of Green Belt land for development, and a flexible framework for doing so across the Borough of St Helens.

## **5. Conclusion**

- 5.1 To conclude, St Helens Borough Council will take a proactive approach towards securing compensatory improvements in the Green Belt to offset the release of other Green Belt land for development, building on environmental and recreational improvements already delivered within the Green Belt.
- 5.2 Green Belt compensatory improvements will be delivered in a variety of locations including those outlined above (such as strategic locations, NIA's, LWS and LNR as well as other non-designated areas within the Borough). This will ensure that improvements within the Green Belt occur throughout the Borough.
- 5.3 The strategic locations identified (Bold Forest Park and Sankey Valley) will be seen as a focal point for compensatory improvements. This is primarily due to these locations being strategic in nature and having a multi-functional, significant and vitally important role for achieving many of the wider aims and objectives of the Local Plan such as delivering sustainable and healthy communities.
- 5.4 Nevertheless, the Council also recognise that improvements within the Green Belt should occur across the Borough of St Helens, reflecting the broad geographical distribution of development proposed in the Plan, and the associated release of Green Belt land to enable this. Facilitating improvements across a wider geographical range will provide the entire population of St Helens with areas to enjoy and benefit from higher quality

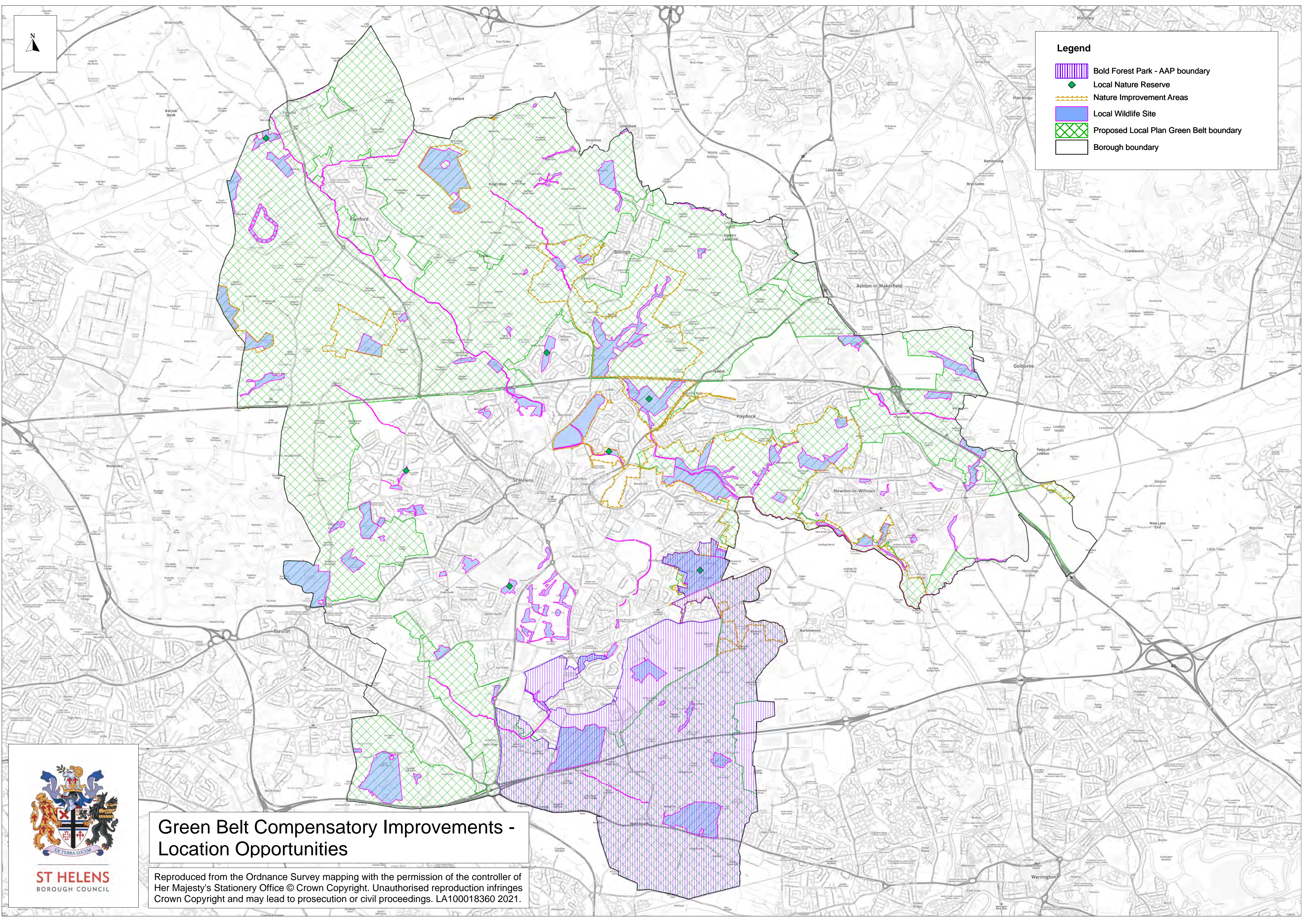
Green Belt locations. Thus, resulting in greater environmental and social benefits to be achieved.

- 5.5 Collaboration with landowners, developers and partnership organisations has been, and will continue to be, critically important to ensure the successful delivery of improvements to the Green Belt. Working in partnership supports the development of a coherent approach towards delivering successful initiatives that enable multiple positive outcomes to be achieved, for example; improving access to Green Belt, expanding the ecological network and expanding the green infrastructure network of St Helens Borough.
- 5.6 To conclude, the Council's approach towards the delivery of compensatory improvements will be effective during the plan period and beyond.

## **Appendix 1:**

Location plan illustrating areas of opportunities for the delivery of Green Belt Compensatory Improvements within the Borough of St Helens.





**Legend**

- Bold Forest Park - AAP boundary
- Local Nature Reserve
- Nature Improvement Areas
- Local Wildlife Site
- Proposed Local Plan Green Belt boundary
- Borough boundary

## Green Belt Compensatory Improvements - Location Opportunities

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