



ST HELENS BOROUGH LOCAL PLAN 2020-2035 EXAMINATION

MATTER 3 – SPATIAL STRATEGY AND STRATEGIC POLICIES

ON BEHALF OF REDROW HOMES NORTH WEST

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CONTENTS

1.	INTRODUCTION	2
2.	ISSUE 1: PREVIOUSLY DEVELOPED LAND AND HOUSING DENSITIES	3
3.	ISSUE 2: GREEN BELT AND EXCEPTIONAL CIRCUMSTANCES	4
4.	ISSUE 3: THE PRINCIPLE OF SAFEGUARDED LAND BEING IDENTIFIED TO MEET LONGER-TERM DEVELOPMENT NEEDS.....	7
5.	ISSUE 4: COMPENSATORY IMPROVEMENTS TO GREEN BELT LAND	13
6.	ISSUE 5: THE SPATIAL DISTRIBUTION.....	15
7.	ISSUE 6: SITE SELECTION	18
8.	ISSUE 7: POLICIES LPA03 AND LPA01	19
9.	CONCLUSION.....	20

1. INTRODUCTION

- 1.1 Pegasus Group has been instructed on behalf of their client, Redrow Homes North West (Redrow), to prepare Hearing Statements to the St Helens Local Plan Examination (EIP) in support of their land interests in the Borough. This comprises land to the south of Burrows Lane, Eccleston, which is currently an omission site (i.e. is not allocated for development) in the emerging St Helens Local Plan.
- 1.2 This Statement deals with Hearing **Session 3 Matter 3 'The Spatial Strategy'**.

2. ISSUE 1: PREVIOUSLY DEVELOPED LAND AND HOUSING DENSITIES

Question 1 - Is there any inconsistency between LPA02 and the Framework in relation to its approach to brownfield land?

- 2.1 Yes. Whilst the NPPF refers to making effective use of brownfield land, it says nothing about incentivising one land type over another through reduced developer contributions, as set out in LPA02 part 3. As such, the final sentence in paragraph 3 should be removed and should also make it clear that it is the re-use of 'suitable' previously developed sites.
- 2.2 Whilst brownfield sites can sometimes generate higher costs and lower sales values, this is an over-simplistic assumption as greenfield sites can also sometimes carry significant abnormal/opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within their Viability Assessment¹.

Question 2 - Would Section 3 of Policy LPA05 ensure that optimal use is made of sites as set out in paragraph 123 of the Framework?

- 2.3 Redrow object to the wording of this policy and the use of minimum densities. We appreciate the need to encourage higher densities in the most accessible locations in line with the NPPF, but recommend that any densities are a guide rather than a policy requirement with sufficient flexibility to take account of local character, site specific circumstances, market aspirations and viability.

¹ Paragraph 5.20 of VIA001

3. ISSUE 2: GREEN BELT AND EXCEPTIONAL CIRCUMSTANCES

Question 3 - Does the presence of Green Belt provide a reason for restricting the overall scale of development proposed by the Plan (paragraph 11. b) i of the Framework)?

- 3.1 Not in itself. Whilst Green Belt is one of the areas of particular importance included in footnote 6 of paragraph 11b(i) of the Framework which can justify a restriction in the overall scale of development, the authority is still tasked with preparing a plan that delivers the three pillars and objectives of sustainable development through the Local Plan. Not meeting housing and economic needs in full would have significant and harmful economic and social consequences and would therefore require a strong reason to reduce the amount of land required for these purposes.
- 3.2 In accordance with section 13 of the NPPF, SHBC have:
- fully examined all other reasonable options for meeting their needs, including maximising brownfield development, optimising densities, and discussing whether neighbouring authorities could accommodate some of its needs (in line with NPPF paragraph 137);
 - demonstrated that exceptional circumstances exist to allow Green Belt boundaries to be altered (in line with NPPF paragraph 136), and this is addressed in more detail below in our answer to question 4; and
 - undertaken a Green Belt Review which identified that sufficient land could be released to meet identified needs without conflicting with the five Green Belt purposes (paragraph 134). This concludes that the Green Belt in St Helens does not provide a reason to restrict of the overall scale of development.
- 3.3 Halton, Knowsley, Warrington, West Lancashire and Wigan Local Authorities are also covered by Green Belt and have or are in the process of conducting Green Belt reviews to meet their own housing needs. As such, not releasing Green Belt land in St Helens would mostly likely result in the loss of Green Belt elsewhere, which is unlikely to be sustainable, as acknowledged in the Green Belt Review².

Question 4 - Have, in principle, exceptional circumstances been demonstrated for the alteration of Green Belt boundaries?

- 3.4 Yes. We support the Council's position that exceptional circumstances are present to justify alterations to Green Belt boundaries.
- 3.5 However, harm that will occur from failing to meet housing and employment needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice is a critical component of the exceptional circumstances required for Green Belt release in St Helens. Reflecting this in the supporting text

² Document References GRE001 and SD020

and policy would ensure the policy to release Green Belt land is justified and in line with NPPF paragraph 136.

Question 5 - On the assumption that the housing and employment requirements are justified, has the quantum of Green Belt release been supported by proportionate evidence? For example, has effective use of sites in the built-up areas and brownfield land been fully explored, including optimising the use of such land?

- 3.6 We disagree that the overall housing requirement has been justified, and think it should be increased, as addressed in more detail in our Matter 2 Statement.
- 3.7 We accept that the Council have explored all brownfield opportunities in order to justify their conclusions that Green Belt release is required.
- 3.8 Notwithstanding this, we consider the Council have been overly optimistic on the amount of homes that will come forward on the urban area SHLAA sites and on some of the allocations. We address this in more detail in Matters 4 and 5.
- 3.9 We consider that 34 of these sites should not be deemed 'developable' based on the evidence presented by the Council to date. If those sites are omitted from the Council's housing supply, this reduces the urban area capacity by **1,175 homes** during the plan period, meaning additional Green Belt land needs to be released.

Question 6 - On a Borough-wide level is the methodology for Green Belt assessment robust and reasonably consistent with that used by adjoining authorities?

- 3.10 We do not believe the methodology for the St Helens Green Belt Assessment to be robust, nor is it consistent with that used adjoining authorities.
- 3.11 All five authorities adjoining St Helens have conducted or are in the process of conducting Green Belt Reviews to meet housing and employment needs in their adopted/ emerging plans. A summary of the Green Belt Reviews (GBR) in all nearby authorities (including other Merseyside authorities not directly adjoining St Helens) is provided at Appendix 1 of **SD026**. We comment on the most relevant of these below (namely Halton, Warrington and Wigan) which have been prepared in recent years under current national guidance.
- 3.12 There is no firm methodological guidance on how to undertake a GBR, beyond the requirement to consider the five purposes of the Green Belt (as set out at NPPF paragraph 134), and to define parcel boundaries clearly using physical features that are readily recognisable (para 139). There is certainly nothing in the guidance to suggest that suitability/deliverability credentials should be considered within a GBR. Such matters are generally considered separately to avoid any conflation of issues, with the GBR being an objective assessment of sites against the 5 Green Belt purposes.
- 3.13 Certain practitioners (including Arup and LUC) have established standardised approaches in line with the above, to provide independent, standalone GBR. Indeed, Arup have undertaken

Warrington's GBR and LUC have undertaken Wigan's (as part of the wider evidence base for the Greater Manchester Spatial Framework/ GMSF).

3.14 However, both St Helens (December 2018, **SD020**) and Halton (November 2017) have undertaken their assessments 'in house'. This does raise the question of whether they have considered the Green Belt issue in isolation or whether it has been conflated with other elements of the site selection process as noted above. Whilst the individual methodologies and stages of these reviews differ, it is clear that both conflate Green Belt contribution with constraints, sustainability and other suitability/ deliverability criteria, which is not considered to be robust.

3.15 Focussing on the St Helens GBR specifically, we summarise our concerns below, as raised in our Regulation 19 representations:

- The final site ratings are based on 3 criteria (Green Belt Purposes a, b and c) with 4 different ratings (Low/ Medium/ High/ High +), giving only 12 possible scores, which provides limited scope for differentiation in ranking the 99 parcels, and many more sub parcels, assessed. This is an overly broad-brush approach.
- The historic towns issue (Green belt purpose d) is conflated with general heritage impacts in the Stage 2 assessment, and indeed discounts some parcels based on heritage impacts. This is an example of the muddled methodology noted above, with Green Belt contributions of parcels conflated with other suitability/ deliverability considerations (others include flood risk, land ownership and noise).
- The 2018 GBR is an update of the previous 2016 version, also undertaken by the Council, that sought to allocate and safeguard a very different suite of sites, even though overall development needs have not changed significantly and certainly haven't justified a wholesale change in approach.
- NPPF paragraph 138 requires Green Belt Reviews to consider accessibility by public transport and the ability to make compensatory improvements to remaining Green Belt land. However, there is no evidence that these issues have been given any elevated credence in the GBR or wider site selection processes. In the case of the Burrows Lane site being promoted by Redrow, this is well served by public transport with bus stops offering high frequency services directly adjacent to the site. Furthermore, only the northern section of the landholding is being promoted for development within the emerging plan (11.6 of 18.7 Ha so approximately 60%), which allows ample opportunities for compensatory improvements on the remaining 7.1 Ha to the south of the site.
- Some of the proposed allocations and safeguarded sites (7HA, 1HS, 2HS, 4HS, 5HS and 6HS) do not cover the same area as the parcels assessed in the Green Belt Review, which often extended towards more logical physical boundaries and generated more positive scores than the final allocation sites would have.

4. ISSUE 3: THE PRINCIPLE OF SAFEGUARDED LAND BEING IDENTIFIED TO MEET LONGER-TERM DEVELOPMENT NEEDS

Question 7 - Are the proposals to identify safeguarded land between the urban area and the Green Belt justified to meet longer-term development needs?

4.1 The principle of identifying safeguarded land for delivery beyond 2035, has been justified in line with paragraphs 136 and 139 of the NPPF, as it provides permanence for the Green Belt to endure beyond the plan period.

Question 8 - Has enough or too much land been proposed for safeguarding to meet longer-term development needs?

4.2 Insufficient land has been safeguarded in the submitted plan to meet longer terms needs, particularly when compared with the previous draft of the plan, which we addressed in detail in our Regulation 19 reps, summarised below, and updated where appropriate.

4.3 The Local Plan Preferred Options (2016) identified 24 safeguarded sites capable of delivering 7,895 dwellings (equating to 13.8 years' worth of supply), yet the submitted plan identifies just 8 sites for 2,641 dwellings (equating to just 5.4 years supply against the Council's current target, and 4.6 years against the previous 570 dpa target, which we advocate as a minimum). If the 456 additional dwellings from site 3HS are included, should the highway capacity issues there be addressed, this increases the total capacity of safeguarded land to 3,097 dwellings (6.4 years against the proposed requirement and 5.4 years against the previous target).

4.4 This represents a stark reduction in the number and capacity of safeguarded sites, with 19 previously safeguarded sites removed, and others reduced in size.

4.5 This is clearly insufficient, as it fails to follow the NPPF guidance that green belt boundaries should endure beyond full plan periods. It follows that the supply of safeguarded sites should last at least 15 years, which is the standard Local Plan period as advocated in NPPF paragraph 22.

4.6 The Council do acknowledge³ that the Local Plan Preferred Options (2016) sought to include 15 years of safeguarded land; but that there was significant local opposition, effectively admitting that was the reason it was removed, rather than it being justified by the evidence (see Figure 7.9 in our Regulation 19 representations).

4.7 It seeks to justify the reduced provision on the basis that there will be significant capacity from other sources available post 2035, including:

- Ongoing delivery from the larger strategic allocations (sites 2HA, 4HA, 5HA, 6HA and 10HA), with an expected capacity of **3,358 dwellings**.

³ See paragraph 3.57 of the Housing Need and Supply Background Paper (October 2020) (SD025)

- Continued windfall development (the Council assume 46 dpa so **690 dwellings** over a 15 year period);
- The additional headroom on both the SHLAA (15%) and Green Belt sites (20%) to allow for under delivery totalling **623 dwellings**. The Council argue that if this land is left over post 2035 it could contribute to the next plan period, or if delivered before could be used to off-set/ reduce future requirements.
- **TOTAL = 4,671 dwellings.**

- 4.8 We raise a few issues with this. Firstly, these other sources are not safeguarded land, they are a mix of existing Green Belt allocations and urban sites. Theoretically, these sources could be delivered within the current plan period, rather than being protected from delivery beyond the plan period (i.e. post 2035) as required by the NPPF, so should not be allowed to off-set safeguarded land provision. Conversely, some of the above sites could not come forward at all.
- 4.9 Secondly, the aim of the NPPF is to significantly boost the supply of housing, with the requirement seen as a minimum, so surpassing this should be encouraged and welcomed, and not used to reduce future requirements. If anything, elevated delivery demonstrates that underlying need and demand is strong and should potentially be increased in the future, as advocated in the NPPG⁴. Conversely, if some sites did not deliver, that might be down to a site-specific issue, availability issues, etc that are not reflective of market demand and hence why there should be a healthy supply of safeguarded sites identified for development beyond the plan period to allow for future flexibility.
- 4.10 Finally, we have previously raised issues with the proposed flat windfall rate of 93 dpa through the emerging plan period, on the basis that sources of windfall are finite and should fall over time as more sites are picked up through the call for sites and SHLAA processes; whilst an up to date adopted plan will also restrict speculative development. Therefore, proposing a halved windfall rate of 46 dpa from years 16-30, seems extremely optimistic, is simply not evidenced and should be reconsidered.
- 4.11 As such, other sources of future supply should be disregarded from the safeguarded land calculations.
- 4.12 Accordingly, based on a housing requirement of 570 dpa, the Council should be safeguarding land for at least 8,550 dwellings, between 5,453 and 5,909 more than currently planned for (depending whether 3HS is included in full). It is pertinent, that even if the additional sources of supply noted above were included, the Council would still need to allocate between 782 and 1,238 additional dwellings to provide a further 15 year's land post 2035.

⁴ Paragraph 2a-010-20201216 of the NPPG

Question 9 - In general terms is the safeguarded land in the right place to meet longer-term development needs?

- 4.13 No, the safeguarded land is not in the right place to meet longer term needs.
- 4.14 The submitted plan and supporting Spatial Strategy Background Paper (SD026) does not indicate where longer term (post 2035) development needs will be best met, although we acknowledge that this is very difficult to predict at the current time, and that there is limited national guidance on this.
- 4.15 We have to assume that this is intended to align with the current Spatial Strategy (Policy LPA02), which states that (our emphasis):
- "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".*
- 4.16 The supporting text at paragraph 4.18.12 builds on this stating:
- "The location of sites that have been released from the Green Belt has been determined by the St Helens Green Belt review... Whilst this process has constrained the ability to identify suitable sites in some key settlements, all settlements will have opportunities for housing development either within them or nearby."*
- 4.17 This text supports an approach where allocated and safeguarded sites will be distributed amongst the Core Area and other key settlements, where practicable, guided by the Green Belt Review.
- 4.18 We fully support the need for a robust Green Belt Review as this is clearly important to demonstrate the exceptional circumstances required to amend Green Belt boundaries. That said, the 2019 NPPF is clear that when '*reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account*' (para 138) and that '*when defining Green Belt boundaries plans should - ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development*' (para 139).
- 4.19 Therefore, it is our strong view that the Green Belt Review should support rather than constrain the Council's ability to deliver growth to the key settlements, and this is applicable to both allocations in the current plan period and safeguarded sites beyond.
- 4.20 In respect of safeguarded land, the Green Belt Review and site selection process has led to the concentration and uneven distribution of sites, with two large sites at Eccleston (3HS) and Windle (8HS) accounting for 64% of all safeguarded land.

4.21 Indeed, the Windle site alone comprises 33% of all safeguarded land, even though it is not listed as being part of the Core Area or a Key Settlement in the supporting text to policy LPA02, and is clearly a peripheral suburb of the urban area with limited accessibility and rail connectivity.

4.22 Even within the St Helens Core Area, distribution is uneven, with sites 3HS and 8HS accounting for over 90% of growth, only 4 of the 9 ward areas receiving growth, with 3 of the sites located to the south and south west of St Helens, with none to west or east. In addition, some of the selected sites relate to specific suburbs/ sub areas within those wards and will not necessarily serve the needs of the whole ward. For example, the Eccleston site 3HS lies within the ward of Eccleston but is more functionally related to the suburbs of Thatto Heath and Eccleston Lane Ends and a different market location therefore arguably serving a different local need. This uneven distribution is shown on the plans and table below:

Figure 4.1 – Plan (Extract) showing Local Plan Distribution (SHLAA sites, Allocations and Safeguarded Land)

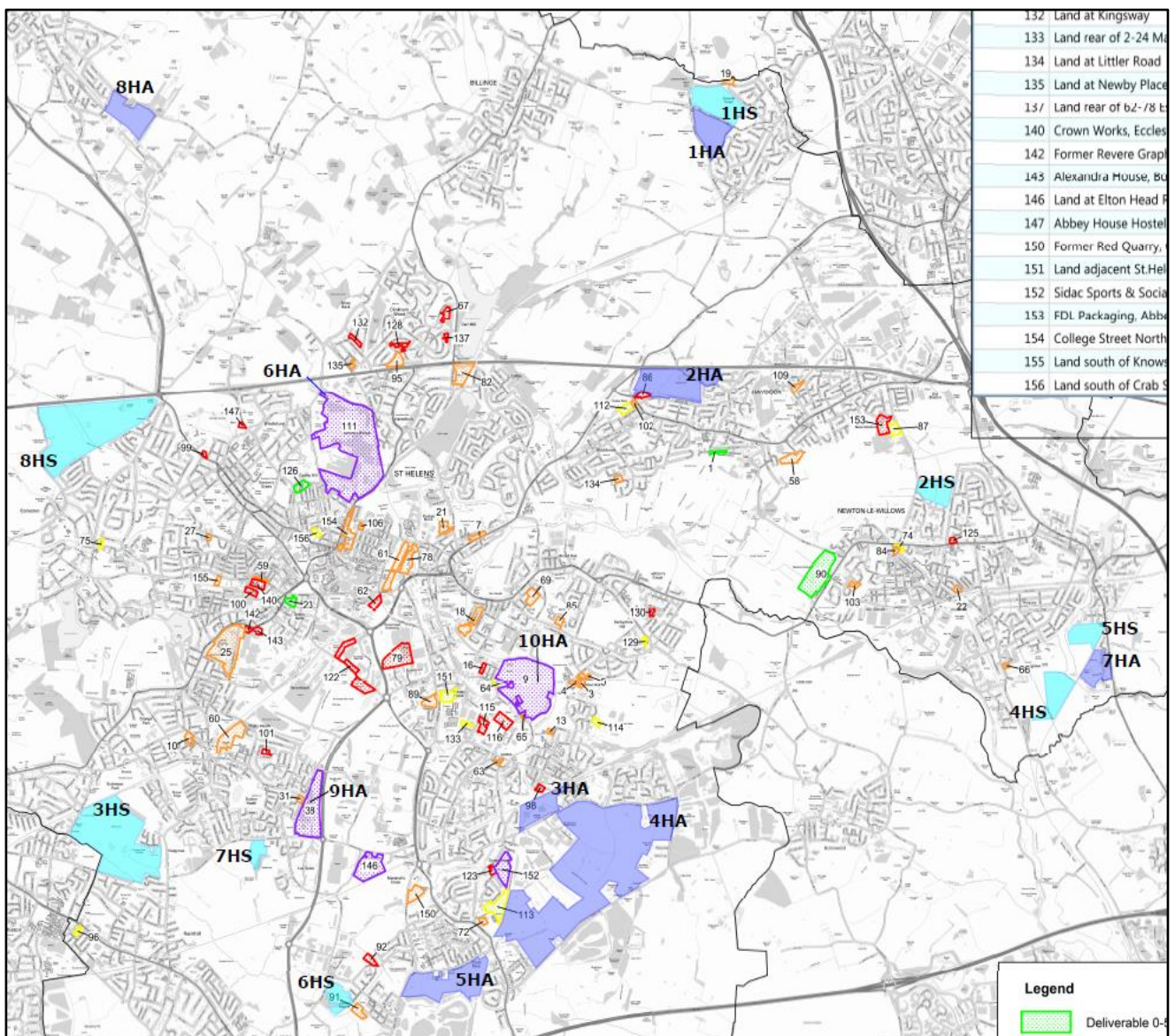


Figure 4.2 – Table showing Safeguarded Land Distribution

AREA	SUB AREA/ WARD* ⁵	Total	%	% of Core Area
St Helens Core Area	Town Centre			
	Moss Bank			
	Clock Face (Bold)*	113	3.65%	5.18%
	Eccleston	956	30.88%	43.86%
	Parr			
	Sutton			
	Thatto Heath*	84	2.71%	3.84%
	West Park*			
	Windle*	1,027	33.18%	47.12%
	CORE AREA SUB TOTAL	2,180	70.42%	
Key Settlements	Blackbrook & Haydock*			
	Newton Le Willows & Earlestown*	625	20.19%	
	Rainford			
	Billinge*			
	Garswood*	291	9.40%	
	Rainhill			
TOTAL		3,096		

- 4.23 The concentration of large safeguarded sites (across sites 8HS and 3HS in particular) is also likely to generate deliverability issues in the next plan period. Lichfield’s research from 2016⁶ suggested that sites of this scale (between 999 – 1,499 dwellings) had an average lead in time of 9.2 years from first identification in a plan (3.9 years to submission of the first planning application then 5.6 years to start on site), with average delivery rates of 105 per year after that.
- 4.24 If it is assumed applications could not be submitted on safeguarded sites till the next plan period (after 2035) that would potentially push commencement of delivery beyond 2040 and completion towards 2050.
- 4.25 Based on the above, we suggest the distribution strategy for safeguarded land should be reconsidered as it will not deliver the balanced sustainable development required by policy LPA02. In particular we recommend that the Windle & Eccleston allocations (8HS & 3HS) are reconsidered, given that they are so large and that Windle in particular is not identified as a focus for growth (either as a key settlement or part of the Core Area), and that safeguarded land is distributed more evenly around the Core Urban Area on smaller sites rather than being so focussed on larger sites

⁵ There is some discrepancies between the names and grouping of Key Settlements and sub areas of the Core Area in the supporting text to Policy LPA02 (para 4.6.3 of SD001) and the ward boundaries on the ground, which we have combined/ labelled as follows:

- Thatto Heath, West Park and Windle are wards but not listed as sub areas of the Core Area;
- The Clock Face Sub Area covers the ward of Bold;
- Blackbrook & Haydock are two wards combined as one Key Settlement;
- Newton Le Willows & Earlestown are two wards combined as one Key Settlement;
- Billinge & Garswood are two Key Settlements covered by one ward (Billinge & Seneley)

⁶ Entitled 'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?'

in the south and south west to boost delivery in the next plan period or during this plan period, should land supply slip.

- 4.26 We also refer to our comments on the deliverability of the proposed safeguarded sites within our Matter 4 Statements.

Question 10 - Are the terms of Policy LPA06, particularly in relation to the release of safeguarded land, consistent with national policy?

- 4.27 The terms of policy LPA06 are not inconsistent with national policy (paragraphs 136 and 139 of the NPPF) in respect of the release of safeguarded land, albeit the NPPF is not particularly detailed or prescriptive on this matter.
- 4.28 That said, we would recommend that Policy LPA06 builds in flexibility to release or phase the release of safeguarded sites without a formal plan review if the monitoring process indicates delivery targets are not being met, as the wording of NPPF para 139 part d) only requires an 'update' to a plan rather than full review. This should provide a quicker way to boost supply than the Local Plan process, which in the case of the current process can take 3-5 years to complete.
- 4.29 This could potentially be tagged to performance against the Housing Delivery Test and added to the Monitoring Framework in Appendix 4, potentially replacing the current trigger (early review of the plan if 10% or more of safeguarded land is granted planning consent).

5. ISSUE 4: COMPENSATORY IMPROVEMENTS TO GREEN BELT LAND

Question 11 - Taking into account the Council's initial response, is the Plan clear on how it would intend to deliver compensatory improvements?

- 5.1 The Council's answer to PQ47 (**SHBC001**, page 35) sets out a number of potential compensatory improvements in accordance with the NPPG⁷, including:
- The strategic compensatory improvement of Bold Forest Park through the BFP AAP (adopted 2017), with sites 4HA and 5HA, which are in or adjacent to the BFP, expected to deliver specific improvements, including tree planting, foot/ cycle/ and bridleway connectivity, and utilities connections to a new visitor's car park and centre.
 - Site by site improvements from remaining allocations, including: *'expanding and improving public rights of ways in and around proposed development sites, providing opportunities for outdoor sport and recreation on previously inaccessible Green Belt sites, providing woodland and ecological network links, improving access to existing sites and retaining and enhancing landscapes, visual amenity and biodiversity.'*
- 5.2 However, there is very little detail on how these would actually be delivered, with neither the Bold Forest AAP or Bold Forest Garden Suburb Position Statement (October 2020) (**SD027**) mentioning compensatory improvements at all, or how this is tied in with any equalisation/collaboration strategy with landowners within this area. Furthermore, this does not appear to have been factored into the Council's Viability Assessment (**VIA001**), which is a significant oversight, and must be clarified by the Council.
- 5.3 PQ47 does list other policies in the plan (Policy LPA09: Green Infrastructure; LPA11: Health and Wellbeing; LPC07: Greenways; LPC08: Ecological Network; and LPC09: Landscape Protection and Enhancement) which will help achieve landscape improvements; however these will largely be limited to land within applicant's control without any mechanisms for off-site improvement.
- 5.4 In short, NPPF Paragraph 138 is clear that the onus is on strategic policy-making authorities to set out ways to secure these compensatory improvements and not on private landowners or developers, and therefore this will need to be addressed before this plan can be considered sound.
- 5.5 Finally, we would reiterate that Redrow's Burrows Lane, Eccleston site offers genuine opportunities for compensatory improvements 'on site', as only the northern section is being promoted for development (11.6 of 18.7 Ha) with the remaining 7.1 Ha to the south undeveloped.

⁷ See paragraph 64-002-20190722

Question 12 - On the assumption that the Plan's policies should set out ways that such compensatory improvements would be achieved, what modifications would be necessary?

5.6 The NPPG⁸ provides guidance on how to secure compensatory improvements. Based on these requirements, significant further evidence is required, before modifications to the policies can be considered, including:

- identifying and securing additional Green Belt land with potential for improvement;
- establishing approximate costings for those improvements;
- applying a mechanism for these to be proportionately funded by Green Belt allocations, through S106 contributions, in line with the CIL tests; and
- factoring these costs into the Council's Viability Assessment, to assess their impact on scheme viability.

⁸ See Paragraph 64-003-20190722

6. ISSUE 5: THE SPATIAL DISTRIBUTION

Question 13 - Is the spatial distribution of development within the Plan justified?

6.1 The spatial distribution is not justified. We summarise our position below and update where appropriate:

- The submitted plan supports an approach where allocated and safeguarded sites will be evenly distributed amongst the Core Area and Key settlements, where practicable and guided by the Green Belt Review. It is Redrow's view that growth should be concentrated towards the most sustainable part of the borough, the Core Area.
- The NPPF confirms that Green Belt Review should support rather than constrain the Council's ability to deliver growth to the key settlements.
- The findings of the Green Belt Review and SHLAA have led to an uneven distribution of sites, with too much proposed in the Key Settlements of Newton-le-Willows, Blackbrook & Haydock and Garswood, as well as Windle (which is not identified as a Key Settlement or part of the Core Area in the submitted plan), rather than locating development within the Core Area.
- The Core Area does not receive an appropriate proportion of growth and once again this is unevenly distributed within the different wards and sub areas within it, with Parr, Sutton and West Park receiving very low growth; whilst Eccleston also receives very low growth (given that all but 32 of its 988 dwelling total are taken up by the Eccleston Golf Course site 3HS which is safeguarded and not closely related to the actual suburb of Eccleston as noted above). Conversely the Town Centre, Bold and Thatto Heath wards receive over 50% of the overall development and 65% of the Core Area's development. This uneven distribution is shown on the plan at Figure 4.1 and the further plan and table below (at Figure 6.1 and 6.2).
- Our analysis also demonstrated that those areas that attracted the highest level of local representation at Preferred Options/ Regulation 18 stage (most notably Rainford, Eccleston, Haydock and Rainhill) also saw the most allocations removed or downgraded. This would suggest that many of these sites have been removed in response to local opposition, and would align with the Council's effective admission at paragraph 3.57 (**SD025**) that local opposition was the reason for the quantum of safeguarded land being reduced in the Submission Plan (see our answer to question 8).
- Based on this, we suggest that the proposed distribution should be reconsidered as it is simply not justified, nor effective, as it will not deliver the balanced sustainable development required by policy LPA02. We believe that additional allocations and safeguarded sites are required to boost supply in the areas that are underserved within the Submission Plan including Eccleston.

Figure 6.1 – Key Settlements Plan

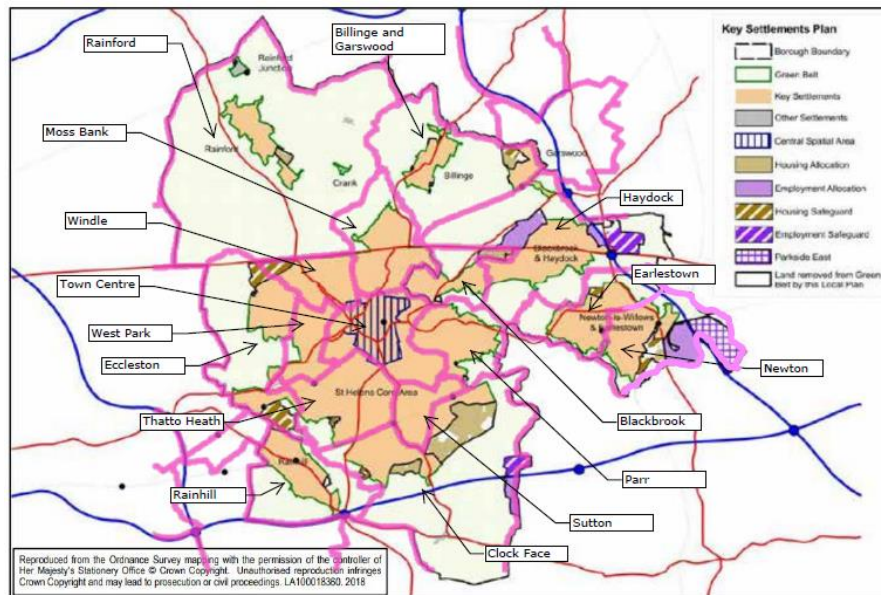


Figure 6.2 – Table showing Local Plan Distribution

AREA	SUB AREA / WARD ⁹	Total Supply	% Total Supply	% of Core Area
St Helens Core Area	Town Centre	2,035	14.08%	17.95%
	Moss Bank	1,032	7.14%	9.10%
	Bold (inc Clock Face)	4,377	30.28%	38.60%
	Eccleston	988	6.84%	8.71%
	Parr	259	1.79%	2.28%
	Sutton	275	1.90%	2.43%
	Thatto Heath	1,122	7.76%	9.90%
	West Park	172	1.19%	1.52%
	Windle	1,078	7.46%	9.51%
CORE AREA SUB TOTAL		11,338	78.44%	
Key Settlements	Blackbrook & Haydock	694	4.80%	
	Newton Le Willows & Earlestown	1,562	10.81%	
	Rainford	317	2.19%	
	Billinge & Seneley Green (inc Garswood)	515	3.56%	
	Rainhill	29	0.20%	
TOTAL		14,455		

⁹ There are some discrepancies between the names and grouping of Key Settlements and sub areas of the Core Area in the supporting text to Policy LPA02 (para 4.6.3 of SD001) and the ward boundaries on the ground, which we have combined/ labelled as follows:

- Thatto Heath, West Park and Windle are wards but not listed as sub areas of the Core Area;
- The Clock Face Sub Area covers the ward of Bold;
- Blackbrook & Haydock are two wards combined as one Key Settlement;
- Newton Le Willows & Earlestown are two wards combined as one Key Settlement;
- Billinge & Garswood are two Key Settlements covered by one ward (Billinge & Seneley)

Question 14 - Has the spatial distribution had regard to the impacts on climate change, including CO2 emissions?

- 6.2 It is not clear from the submitted plans and evidence base that the spatial distribution has had regard to climate change, indeed we have already noted in our answer to question 6, that public transport accessibility has not been given any elevated status in the selection of Green Belt sites.
- 6.3 Indeed, it is illuminating that the Climate Change Background Paper (October 2002) (**SD028**) does not assess Spatial Strategy Policy SPA02 and site distribution in its review of climate change impacts on individual policies.
- 6.4 One obvious area that seems to have been overlooked and would have a significant impact on emissions would be to maximise development around public transport hubs such as bus stops and train stations, as confirmed by NPPF paragraph 102.
- 6.5 In short, the existing public transport network running through any authority area should be one of the principal, early considerations in plan making and represent a key sustainability criteria in determining where new development should be targeted so as to ensure any Local Plan embodies the principles of sustainable development, as reinforced in para 103 of the NPPF.
- 6.6 It would therefore be reasonable to assume that the location of development in sustainable locations adjacent to public transport facilities, goes as far as influencing public health, which we would argue is not only a critical planning policy issue but also a legal and public health and well-being requirement which cannot be ignored.
- 6.7 The Accessibility Statement at Appendix 3 of our Regulation 19 Representations confirmed that the Burrows Lane does have bus stops adjacent to the site (within 400m) offering high frequency services directly to nearby towns and stations, and this compares favourably with the other allocated and safeguarded sites.
- 6.8 In terms of access to a station Eccleston Park is approximately 2.8km walk away, but does have direct pedestrian access, and actually compares favourably with several of the other allocations. Indeed, there are 3 chosen sites (allocations 2HA and 8HA, and safeguarded site 8HS at Windle) that are further from a station (with the at Windle site 3.7km away from St Helens Central), suggesting that the Burrows Lane site should be considered for allocation on climate change grounds.

7. ISSUE 6: SITE SELECTION

Question 15 - Taking into account the range of factors considered in site selection, has the Council's approach been robust, positive and justified?

7.1 The overall site selection process has not been robust, positive or justified, which we addressed in detail in our Regulation 19 representations (and within our answers to questions 6, 11 and 13 above). We summarise our position below and update where appropriate:

- We consider the developable capacity within the urban areas has been maximised through the SHLAA process but is overly optimistic (as addressed in our responses to questions 3 and 5).
- The Green Belt Review methodology is not robust for numerous reasons, most notably the limited scope for differentiation in the ranking of sites; the fact that the objective assessment of Green Belt contribution has been conflated with our other suitability/deliverability considerations; the fact that the 2016 and 2018 versions of the Review supported the allocation a very different suite of sites without much change in the overall needs/ circumstances; and that the Review fails to appropriately consider public transport connectivity.
- The site selection process has not been positive, as has failed to allocate sufficient sites to fully meet development needs with enough of a buffer to provide additional choice and flexibility and to allow for under-delivery; either under the Council's proposed requirement of 486 dpa or our suggested minimum requirement of 570 dpa. This is addressed in more detail in our Matter 5 statement, but in short we estimate that based on our proposed requirement the Council will need to allocate land for approximately **2,925** additional dwellings, rising to **4,635** dwellings to provide 20% headroom on the total supply, for the period 2020-2035.¹⁰
- The individual site selections have not been justified, firstly because they do not align with the spatial strategy in respect of distribution (as addressed in questions 11 and 13). Secondly, and more importantly, a comparative assessment of the Council's own Green Belt Review and Sustainability Appraisal scores does not clearly elevate the chosen sites over omission sites, such as Burrows Lane, with many allocations scoring similarly and some even lower. This strongly suggests the findings of the evidence base have not been carried through to the final site selections, and that there are other factors at play, such as local opposition. Finally, our own assessment actually scores the Burrows Lane amongst the most sustainable, and with relatively low green belt contributions.

¹⁰ These figures may change once our final Matter 5 Statement is submitted later in May, and therefore we may provide updated figures orally at the hearings.

8. ISSUE 7: POLICIES LPA03 AND LPA01

Question 16 - Is Policy LPA03 consistent with national policy and effective?

8.1 Yes.

Question 17 - Is Policy LPA01 necessary for the soundness of the Plan?

8.2 No.

9. CONCLUSION

9.1 It is our view that the Council’s proposed spatial strategy and strategic policies are not justified and will not be delivered by the proposed site allocations. Key points include:

- Exceptional circumstances do exist for Green Belt release, and brownfield capacity has been maximised, albeit the Council have overestimated their total urban capacity, and underestimated the level of Green Belt release required.
- The Green Belt Study is flawed as it conflates issues of suitability and deliverability, fails to appropriately consider public transport connectivity and assesses some sites incorrectly.
- Insufficient safeguarded land has been allocated, and the sites that have will not meet longer term needs as are unevenly distributed and over concentrated in a way that doesn’t align with the spatial strategy.
- The overall site selection spatial distribution in the plan has not been justified, with too much concentrated in certain Key Settlements, parts of the Core Area, and areas not identified for growth; with insufficient allocations within Eccleston and the Core Area.