



NEXUS  
PLANNING

# St Helens Local Plan Examination

## Matter 3 Spatial Strategy and Strategic Policies

On behalf of Eccleston Homes

May 2021

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# 1 Introduction

- 1.1 This Hearing Statement is submitted on behalf of Eccleston Homes in relation to Matter 3, Spatial Strategy and Strategic Policies of the St Helens Local Plan Examination.
- 1.2 This statement follows on from Nexus's Planning representations to the Submission Draft consultation in March 2019 (document ref. RO1957). Additionally this Hearing Statement also builds on the Site specific representations in relation to Station Road, Haydock, prepared by McAteer Associates on behalf of Eccleston Homes (document ref. RO0565),
- 1.3 This statement responds to the following questions posed by the Inspectors in relation to Matter 3 (Spatial Strategy and Strategic Policies) of the examination and hearing sessions :

*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)?*

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

*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?*

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

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

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

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

*13. Is the spatial distribution of development within the Plan justified?*

- 1.4 Our principal concern is that the St Helens Local Plan as currently drafted does not meet the National Planning Policy Framework ('NPPF') test of 'soundness'. Most particularly, in respect of the four criteria identified at paragraph 35 of the NPPF, we do not believe that the proposed St Helens Local Plan is either 'positively prepared' (as it does not seek to meet the area's objectively assessed needs) or 'justified' (as it does not represent the most appropriate strategy when considered against reasonable alternatives) or 'consistent with national policy' (as it fails to accord with the requirements of the NPPF) or 'effective' (as the strategy proposed is not considered to be deliverable over the plan period).

## 2 Response to Matter 3 Questions

*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)?*

- 2.1 The Council has identified in their evidence base (see document ref SD021 Green Belt Review Stage 2b) that there is a shortfall of suitable land within its existing urban areas, and in urban areas of nearby authorities, to meet its housing needs. Therefore, it is necessary to review the Green Belt in the Borough. The Council through their various green belt assessments have identified land (including Station Road, Haydock) which provide a low contribution to the green belt and are considered suitable for release in accordance with Section 13 of the NPPF.
- 2.2 Furthermore, it should be noted that the Council has confirmed in the Housing Need and Supply Background Paper (October 2020) (document ref SD025) that there are no fundamental constraints to the delivery of housing to meets its objectively assessed needs in terms of land availability (once Green Belt sites have been released), viability, environmental capacity and infrastructure capacity.
- 2.3 As such it can be concluded that Green Belt is not a reason to restrict the overall scale of development in St Helens.

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

- 2.4 As set out above, the Council has set out the exceptional circumstances required by national planning policy to alter Green Belt boundaries in response to development needs and a general shortage of land beyond the Green Belt (both within the authority area and nearby authorities).
- 2.5 Nexus support the Council's conclusion on this matter, however consider that additional Green Belt land must be identified in addition to that which is currently being proposed. The reasons for this are outlined later in this statement and set out within Nexus Planning's Submission Draft representations (document ref. RO1957),

*Questions 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?*

- 2.6 Nexus consider the St Helens Local Plan is over-reliant on sites in the built up area, identified through the Strategic Housing Land Availability Assessment (SHLAA), which are predominantly brownfield land and further Green Belt land is required to meet housing needs. As set out in Nexus Submission Draft representations (document ref. RO1957), a significant proportion of the identified SHLAA sites do not have planning permission, have currently active uses, have been identified for housing since the 2012 SHLAA without coming forward and are in areas facing viability constraints as evidenced by the Council's own viability assessment. Nexus consider there is a strong possibility that a high proportion of the SHLAA sites will not deliver as anticipated, meaning the LP will be ineffective in meeting housing needs over the period.
- 2.7 Whilst national policy requires brownfield land to be optimised (Paragraph 137), it also requires Local Plans to be both effective and deliverable over the plan period (Paragraph 16 and 35). In this regard it is Nexus's opinion that the current strategy set out in the Local Plan will not be effective or deliverable in meeting objectively assessed housing 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?*

- 2.8 The identification of safeguarded land is supported by paragraph 139 of the NPPF, where this is required to meet longer-term development needs stretching "well beyond the plan period". The identification of safeguarded land is therefore supported by the fact there is a shortfall of suitable land within its existing urban areas, and in urban areas of nearby authorities, to meet St Helen's housing needs. This is the case for both the proposed Local Plan period (2020-2035) and the period beyond the Local Plan.

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

- 2.9 Nexus consider the scale of safeguarded land proposed is not justified, as more land is required to be both safeguarded and allocated through the St Helens Local Plan to meet housing needs for the proposed plan period and indeed beyond.
- 2.10 As outlined in Nexus Planning's Submission Draft representations (document ref. RO1957), Nexus have reviewed the SHLAA sites that make up the identified supply and do not consider it to be justified nor effective plan-making to rely on these sites to meet this proportion of the housing need. This reinforces the point that in order to deliver the proposed annual requirement from sites identified in the SHLAA, the emerging LP must identify specific deliverable sites to achieve the required level of completions rather than rely on the market to deliver existing smaller scale urban brownfield sites.
- 2.11 In addition, Nexus have demonstrated in the submissions to Matter 2, that in order to stabilise and increase the boroughs population, allow for more housing choice and competition; support planned economic growth; and reflect the higher levels of housebuilding achieved in years before and after the 2008-2009 recession, the housing requirement in the Local Plan should be increased to 547 dpa.
- 2.12 In light of the housing land supply and housing requirement issues identified by Nexus, in addition to increasing the amount of housing allocations overall, it is considered the Council should seek to positively increase the amount of Safeguarded Land designated in the Local Plan to a similar level to that previously proposed in the 2016 Preferred Options Draft Local Plan - which sought to designate a total of 7,895 dwellings as safeguarded land, including land at Station Road, Haydock.
- 2.13 There is a clear risk that at present the proposed Green Belt boundaries will not endure beyond the plan period in accordance with Paragraph 136 and Paragraph 139c of the Framework.

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

- 2.14 As outlined in Table 1.1 below, a number of key settlements areas, including Haydock, are not proposed to receive any safeguarded sites as part of the St Helens Local Plan. This is despite the St Helens Local Plan acknowledging that Haydock forms part of a "Key Settlement Area" in the settlement hierarchy () the borough and acknowledging the settlement contains significant employment opportunities.

Ward	No of dwellings safeguarded	Distribution (%)
Billinge and Seneley Green	291 (1HS)	9.4%
Earlestown	178 (2HS)	5.7%
Eccleston	956 (3HS)	30.9%
Newton	447 (4HS and 5HS)	14.4%
Sutton	113 (6HS)	3.6%
Thatto Heath	84 (7HS)	2.7%
Windle	1,027 (8HS)	33.2%
<b>Total</b>	<b>3,096</b>	

Table 1.1: Distribution of safeguarded land in St Helens

- 2.15 Nexus would question the Council's proposed strategy for safeguarded land in this regard, particularly in light of the fact there are significant employment allocations proposed for Haydock in the St Helens Local Plan(2EA, 3EA, 4EA, 5EA and 6EA), totalling 78.21ha, which will provide further substantial employment opportunities for residents of St Helens.
- 2.16 The NPPF makes clear at paragraph 103 significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Haydock, being located within close proximity of both significant existing and proposed employment areas and with good public transport links, should be receiving a proportionate amount of housing growth during both the plan period and beyond. As outlined earlier, the only realistic way to achieve sufficient levels of growth to meet housing needs will be to remove further land from the green belt.

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

- 2.17 As set out in Nexus Planning's previous representations (document ref. RO1957) the reliance on the identified SHLAA sites will result in a LP Strategy which is not effective and will not achieve sustainable development in the Borough. It will result in a skewed distribution of housing sites, overly focussed on the town centre and inner urban areas.

- 2.18 What is more, a significant proportion of the SHLAA sites (77 of the 97 sites) will not be required to deliver any affordable housing, in line with Policy LPC02 of the emerging LP, meaning overall the LP will fail to deliver the identified need for affordable homes across the Plan Period.
- 2.19 Indeed, 68% of the 'outstanding capacity' of SHLAA sites is concentrated in 4 wards, 3 of which are within the central part of St. Helen's Core Area: Town Centre (26%), Moss Bank (15%), Thatto Heath (16%) and Bold (11%). It is evident that relying on the sites identified through the SHLAA will result in skewed distribution of new housing across the Borough – with growth focussed within these inner urban areas at the expense of the edge of the Core Area and the outlying settlements.
- 2.20 As outlined in the response to Question 12, Nexus consider there has been a significant missed opportunity to align proposed employment and housing growth in St Helens. Haydock, which is considered a key settlement in the settlement hierarchy, contains just one allocation for residential development (2HA) and no safeguarded sites, despite a significant amount of employment growth being proposed. There seems to be no justification for this imbalance between housing and employment growth in Haydock. Such an approach runs contrary to the spatial strategy of the plan which states:
- 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. New development will be directed to sustainable locations that are appropriate to its scale and nature and that will enable movements between homes, jobs and key services and facilities to be made by sustainable non-car modes of transport.*
- 2.21 Indeed the Council's Green Belt assessments have identified various parcels of land in Haydock, including Station Road which provide an overall low contribution to the five purposes of the green belt and have previously been considered suitable for removal from the green belt.
- 2.22 The proposed distribution of homes will lead to a clear imbalance in housing distribution across the Borough which will not be rectified through the proposed Green Belt allocations. It is submitted that by over-relying on SHLAA sites which are concentrated within only a few parts of the Borough, the Submission LP is prevented from delivering a more balanced spatial distribution of growth.

2.23 Nexus consider this approach is not justified or necessary. The proposed distribution of housing will not effectively meet the range of housing needs required in the Borough, explicitly for both market and affordable needs in different parts of the Borough, including in Haydock.

### 3 Summary and Conclusions

3.1 In order for development plan policy to be found 'sound' it should conform to the criteria specified at paragraph 35 of the NPPF. As this Hearing Statement has identified, we do not believe that the Spatial Strategy currently outlined by the Council meets the tests of soundness in the NPPF. Principally the strategy is not:

- **Positively Prepared:** In order to stabilise and increase the boroughs population, allow for more housing choice and competition; support planned economic growth; and reflect the higher levels of housebuilding achieved in years before and after the 2008-2009 recession, the housing requirement in the Local Plan should be increased
- **Justified:** The proposed distribution of homes will lead to a clear imbalance in housing distribution across the Borough. It is submitted that by over-relying on SHLAA sites which are concentrated within only a few parts of the Borough, the Submission LP is prevented from delivering a more balanced spatial distribution of growth and meeting market and affordable housing needs, and this approach is not justified or necessary.
- **Effective:** The current strategy set out in the St Helens Local Plan will not be effective in meeting objectively assessed housing needs over the plan period and beyond.
- **Consistent with national policy:** The plan as currently proposed fails to accord with the requirements of the NPPF.

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