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ST HELENS BOROUGH LOCAL PLAN 2020-2035

EXAMINATION

HEARING STATEMENT IN RELATION TO MATTER 3

on behalf of



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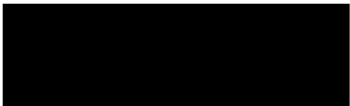

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May 2021

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document Control

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Project No: 1335	Report Ref (file ref): 1335/HS	Issue Date: May 2021
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1 Introduction to the Statement

1.1 Redrow Homes Ltd made representations at the St Helens Local Plan Preferred Options Consultation and the Submission Draft Consultation . These related in particular to land at Junction Road / Stanley Road in Rainford (the site) and argued that the release of this land from the Green Belt to meet housing needs is justified and sustainable. To support the release of this land from the Green Belt two advocacy documents were prepared and submitted.:

- 1) Site selection and Development Statement
- 2) Transportation Assessment

1.2 The Submission Draft of the Local Plan proposes a lower housing requirement and fewer sites for release from the Green Belt than shown at the Preferred Options Consultation Stage. At Rainford there is only a single proposed allocation for housing (on land to be removed from the Green Belt) and no provision for safeguarded land.

1.3 Redrow Homes Ltd believes that, whilst the Local Planning Authority is not supporting the allocation of the site for housing in the plan period, it is an appropriate and sustainable location to meet longer term development needs. There is a strong planning case for the removal of the site from the Green Belt and its identification as safeguarded land.

1.4 This Hearing Statement will address the questions and issues to be considered at the following Hearing Sessions:

1. Session 3, Matter 3 – Spatial Strategy and Strategic Policies

2 Matter 3 – Spatial Strategy and Strategic Policies

2.1 This Hearing Statement will focus on Issue 3 and the associated questions raised in the Matters, Issues and Questions for the Examination and Hearing Sessions.

The principle of safeguarded land being identified to meet longer-term development needs and four associated questions:

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?

2.2 I will take each question in turn.

The Justification for Safeguarded Land to Meet Long-Term Development Needs

2.3 Paragraph 139 of the National Planning Policy Framework (the Framework) sets out that, when defining Green Belt boundaries, plans should:

a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;

b) not include land which it is unnecessary to keep permanently open;

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

d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

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

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent

2.4 Paragraph 139 establishes the principle that, where necessary, the development plan should include areas of safeguarded land between the urban area and the Green Belt to meet development needs which stretch well beyond the plan period. This will ensure the permanence of Green Belt boundaries by identifying land to meet future development needs without triggering a requirement to fundamentally alter the Green Belt boundary in an untimely way.

- 2.5 In addition, paragraph 136 of the Framework requires that: “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”
- 2.6 The outcome of the advice in the Framework is that where there are exceptional circumstances to justify the alteration of Green Belt boundaries then, where necessary, safeguarded land should be identified to meet longer term development needs. This will make the Green Belt boundary more permanent and avoids unnecessarily frequent reviews of its boundary. In other words, safeguarded land is required in order to strike the balance between the preservation of the Green Belt and the need for further growth. Consequently, if land is required to meet longer terms needs it should be excluded from the Green Belt and protected from pressure for development contrary to the longer term needs by including it as safeguarded land.
- 2.7 The “where necessary” test is not explained in the Framework but a reasonable interpretation is where the need to meet long –term development needs has been justified. In St Helens the identification of safeguarded land is deemed by the Council to be necessary to meet development needs well beyond 2035, avoiding the need for changes to the Green Belt boundary for “a substantial period” (Policy LPA02: Spatial Strategy and paragraph 4.6.9). This is justified by the limited capacity of sites in the urban area to meet all long term development needs and the lack of scope in neighbouring authorities to meet long term needs.
- 2.8 The SHLAA is an important part of the evidence base that underpins the drafting of the Local Plan. It represents a comprehensive examination of the potential sources of housing land supply in the Borough. Significantly, it shows that, whilst there is capacity in the existing urban area to deliver some housing, it is not enough to meet requirements through the plan period. This is why the Local Plan seeks to address the shortfall by removing land from the Green Belt and allocating it for housing. This is summarised at paragraph 4.18.11 of the Local Plan where it states:
- “Total delivery from sites in the urban area is expected to fall substantially short of the total housing delivery required under Policy LPA05. As a result, the proposed land supply includes a number of allocated sites that have been released from previous designation as Green Belt.”
- The identification of safeguarded land is justified because, beyond the plan period, it is reasonable to look forward and project that there will remain a need to deliver housing land that falls outside of existing urban areas because the capacity of urban sites to meet all housing needs will be limited. The identification of safeguarded land at this point of plan making is a well-reasoned approach to meeting long term needs that will establish the permanence of the Green Belt boundary for a considerable time.
- 2.9 The principle of the identification of safeguarded land to meet longer term development needs in St Helens is consistent with advice in the Framework and is justified. This is an important part of the emerging development plan which will help to make it sound. It is taking a positive approach to meeting needs beyond the period of the Plan. The potential is created to meet longer term needs without the need to erode the boundaries of the Green Belt. In order to achieve this sufficient and substantial amount of safeguarded land should be identified

otherwise there remains the risk that Green Belt boundaries will need to be reviewed again, sooner than necessary.

Is the amount of safeguarded land enough to meet long term development needs?

- 2.10 The amount of safeguarded land that is needed will be a function of the anticipated amount of development in the long term (beyond the plan period) that will need to be provided for and the opportunity to, at this point in time, define strong and defensible Green Belt boundaries.
- 2.11 In St Helens the Council has rolled forward the housing requirement set out in the emerging plan (486 dwellings per year) and has identified sufficient safeguarded land for housing (estimated yield of 2,641 dwellings) to meet around five years of supply (against the assessed requirement of today).
- 2.12 The Local Plan should be more ambitious and plan for safeguarded land in excess of five year supply. This will give greater flexibility and resilience and will allow for under delivery or no delivery on some of the sites that are already identified for housing. There is a sound planning case that supports the argument that enough safeguarded land should be identified to achieve a degree of flexibility in meeting future development needs and thus postpone the need for further Green Belt reviews. Greater flexibility will account for variations in the minimum housing requirement in the longer term, influenced by trends and projections that signify continuing economic growth and an imperative to meet the needs of all households.
- 2.13 There is an opportunity now to take a robust and forthright approach to safeguarded land in order to establish long term permanence to the Green Belt boundary.

Is the Safeguarded Land in the right place?

- 2.14 When it comes to the definition of Green Belt boundaries, the Framework emphasises that there is a role for development plans to reinforce the need to promote sustainable patterns of development (paragraph 138). The corollary of this is that the release of land from the Green Belt to meet development needs, either in the plan period or beyond, should support the creation of places and settlements that are sustainable.
- 2.15 It follows that, in St Helens, the identification of safeguarded land should be in the form of extensions to Key Settlements. These are recognised as the most sustainable places for living, working and leisure activities.
- 2.16 The emerging Local Plan proposes safeguarded land at the margins of the St Helens Core Area, Garswood and Newton-le-Willows. There are other Key Settlements where there is no provision to meet development needs beyond the plan period including Rainsford, Billinge and Blackbrook / Haydock.
- 2.17 Rainsford is a prime example of a Key Settlement. It has been shown through my representations at the Submission stage of the Local Plan to be a sustainable place which hosts a wide range of facilities and services and which has well established transport links to other parts of St Helens and beyond. Primary and secondary education, shopping and health care are all available in Rainsford and there are realistic opportunities to use sustainable modes of travel to reach other places – bus and cycle routes are available and there is a train station at nearby Rainsford Junction.

2.18 In order to make the plan robust and sound there is a strong planning case to account for the long term growth of all Key Settlements. This will ensure that the most sustainable places can accommodate an appropriate amount of new development in the period after 2035 without the need to look again at the Green Belt boundary around these places. In this way the long term permanence of the Green Belt around Key Settlements can be secured through this emerging development plan. This approach is aligned with the advice at paragraph 138 of the Framework which urges Green Belt boundary reviews to strengthen sustainable patterns of development, both through the plan period and in the longer term.

Is Policy LPA06 consistent with national policy, particularly in relation to the release of Safeguarded Land?

2.19 Two parts of the Framework are particularly relevant. Paragraph 136 deals with the alteration of Green Belt boundaries and paragraph 139 addresses the definition of Green Belt boundaries in development plans.

2.20 The rationale for changing the Green Belt boundary in St Helens through the plan making process is given in the Green Belt Study. This sets out the reasons why it is appropriate now to change the Green Belt boundary to meet evidenced development needs. These reasons represent the exceptional circumstances and, as such, the key test in paragraph 136 is addressed and the release of safeguarded land is justified.

2.21 The detailed provisions in Policy LPA06 are generally aligned with the guidance in paragraph 139 of the Framework. The identified safeguarded land is to meet longer term development needs well beyond the plan period and development for employment or housing will only be confirmed through a future Local Plan review that proposes such development. I have argued that safeguarded land should be considered for all Key Settlements and believe that this is also consistent with paragraph 139 which seeks to secure a sustainable pattern of development through the plan period and beyond (in accord with the spatial strategy of the development plan) and also seeks to establish a position that avoids any need to review Green Belt boundaries in an untimely way.