



St Helen's Local Plan Examination

Lovell Partnerships Ltd's Response to Matter 3 - Spatial Strategy and Strategic Policies

Land at Chapel Lane

On behalf of Lovell Partnerships Ltd.

May 2021

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Asteer Planning on behalf of Lovell Partnerships Limited ('Lovell') in relation to **Matter 3 - Spatial Strategy and Strategic Policies**. Lovell are working closely with the landowners (previously promoting the site) and have an agreement in place to promote the land at Chapel Lane, Sutton Manor ('the site') which is proposed to be removed from the Green Belt and allocated as a safeguarded site for housing (Site 6HS) in the Local Plan.¹
- 1.2 Lovell is proposing a high quality, sustainable residential development for 100% affordable housing on the site, delivering 150 affordable homes early in the plan period through its joint venture partnership (Lovell Together) with Together Housing Group, a Registered Social Landlord. Lovell – Together Corporate Joint Venture LLP is an existing special purpose vehicle under which this site would be delivered. Together Housing Group are a Homes England Strategic partner and have an existing £53m of Homes England grant allocation secured to give greater certainty on delivery.
- 1.3 It is proposed that the site will deliver 50% affordable rent and 50% shared ownership using existing grant funding. As a consequence of the funding, the site is highly deliverable and would make a significant positive contribution towards meeting both affordable housing and overall housing needs early in the Plan period. Lovell therefore seek a modification of Policy LPA05 (Meeting St.Helens Borough's Housing Needs) and Policy LPA06 (Safeguarded Land) to convert the safeguarded site allocation to a full allocation.² This would return the site to the status it held in the draft development plan documents as recently as 2017 as set out in previous representations made at Preferred Options stage.
- 1.4 Matter 3 of the Inspectors' Matters, Issues and Questions ('MIQs') considers whether the spatial strategy is justified and whether related strategic policies are positively prepared, justified, effective, and consistent with national policy³.
- 1.5 Several previous representations have been made by various parties throughout the Local Plan preparation process. This Statement responds directly to the Inspectors' MIQs, however, it should be read in conjunction with previous representations. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework ('NPPF') and the National Planning Practice Guidance ('PPG'). Separate

¹ Policy LPA06: Safeguarded Land

² i.e. remove the site from Policy LPA06 as a safeguarded site and insert the site into Policy LPA05 as a housing allocation.

³ NPPF Paragraph 35

representations are being submitted in respect of the following matters and should be read in conjunction with this Statement:

- Matter 1 – Introduction to the Hearings, Legal Compliance, Procedural, Requirements, and the Duty to Cooperate;
- Matter 2 – Housing and Employment Needs and Requirements;
- Matter 4 - Allocations, Safeguarded Land and Green Belt Boundaries: Bold, Eccleston, Sutton Manor, Thatto Heath and St Helens Core Area;
- Matter 5 – Housing Land Supply; and,
- Matter 7 - Specific Housing Needs and Standards.

2. LOVELL'S RESPONSE TO MATTER 3

- 2.1 This section of this statement sets out the relevant Matter 3 issues and questions within the Inspectors' MIQs to which Lovell wishes to provide a response, including identifying elements/issues that render the plan unsound in the context of paragraph 35 of the NPPF, and how these should be resolved to make the plan sound.

Issue 1: Previously developed land and housing densities

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

- 2.2 Policy LPA02 (Spatial Strategy) refers to the re-use of previously developed land in key settlements being a key priority. It states:

“The re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites. This will be encouraged by setting lower thresholds for developer contributions on previously developed sites to reflect the higher costs and lower sales values typically associated with redeveloping such sites.”

- 2.3 Section 11 of the NPPF refers to making effective use of land. Paragraph 118 c) states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

- 2.4 Whilst Lovell acknowledge the importance of prioritising brownfield sites before releasing land from the Green Belt, the Council's current strategy increases the risk of the Plan not delivering for the following reasons:

- I) Larger strategic sites in the Green Belt such as the Bold Forest Garden Suburb (Site 4HA) will not deliver quickly primarily due to their complexity including comprehensive masterplanning and infrastructure requirements. Should one or more of such sites experience delays or issues with delivery, it would have a detrimental impact on housing delivery as these sites are being relied upon to meet a substantial amount of the overall need;
- II) Previously developed, brownfield sites (e.g. 9HA and 10HA) will not deliver quickly as they often have complex constraints and remediation requirements. As a result, they can incur abnormal costs making it unviable to deliver a policy compliant level of affordable housing and other infrastructure requirements. In addition, as explicitly acknowledged in the proposed policy wording for Policy LPA02, lower thresholds will be set for developer

contributions on previously developed sites in recognition of the viability issues that such sites present.

- 2.5 As set out in further detail in Lovell's Hearing Statement for Matter 2, there is a substantial risk that affordable housing at levels far below the policy requirement, or even no affordable housing, will be delivered from some of the allocation sites based on viability arguments. Within the Council's Economic Viability Assessment (VIA011), as set out at para 6.62, the three brownfield allocations (6HA, 9HA and 10HA) were tested with no affordable provision and it was concluded that they would be viable. However, if education and further S106 contributions are required then there may need to be some adjustments of the overall requirements in relation to 6HA and 9HA where the surplus would not quite be sufficient to cover all potential planning obligation requirements. This suggests that not only will these brownfield allocations deliver no affordable housing, they may still face viability issues, thus threatening their overall delivery or the delivery of infrastructure improvements.
- 2.6 VIA001 also states at para 6.6.4 that testing shows that only 50% of the greenfield housing allocations (1HA, 4HA and 7HA) are sufficiently financially viable to support 30% affordable housing provision together with requirements in relation M4 (2) and (3a) and 10% renewables. In these cases, if education contributions or further S106 contributions are required for 4HA and 7HA there may need to be some flexibility in relation to the hierarchy of planning contributions.
- 2.7 The results for 2HA (Florida Farm), 5HA (Gartons Lane) and 8HA (Higher Lane) show more limited surpluses. This analysis suggests potential viability concerns with the greenfield sites which could result in either reduced affordable housing provision or a reduction in other contributions sought.
- 2.8 In addition, Vacant Building Credit (VBC), which was introduced by the Government to bring back into use previously developed sites containing vacant buildings, can be utilised to reduce / remove affordable housing contributions. Several of the Council's proposed housing allocations are brownfield / partially brownfield sites (3HA, 6HA, 7HA, 9HA, 10HA) and therefore may contain existing buildings that would benefit from VBC.

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

- 2.9 In dealing with density, NPPF paragraph 123a requires that minimum density standards should be used for town centres and other locations well served by public transport.
- 2.10 Section 3 of Policy LPA05 (Meeting St. Helens Borough's Housing Needs) sets out the densities that housing development should aim to achieve depending on where the site is located as follows:

- a) at least 40 dwellings per hectare (dph) on sites that are within or adjacent to St.Helens or Earlestown Town Centres;
- b) at least 30 dph on sites that are within or adjacent to a district or local centre or in other locations that are well served by frequent bus or train services; and
- c) at least 30 dph on other sites that are within an existing urban area.

2.11 In response to preliminary questions, the Council has suggested a main modification (MM) to the policy (SHBC001 – PQ44) which deletes criterion 3c and amends criterion 3b to capture *'all other sites that are within or adjacent to a district or local centre or in other locations that are well served by frequent bus or train services'*.

2.12 Policy LPA05 ensures that optimal use is made of sites in terms of density, generally in accordance with the NPPF which seeks to make effective use of land. Due to the urban and rural nature of the Borough, a 30dph minimum is generally acceptable and in keeping with the existing built development in some local centres, whilst other parts of the Borough (in locations of existing denser development) a higher density will be more appropriate. The proposed policy approach (as opposed to a definitive map identifying zones) will enable the Council to review proposals on a case-by-case basis in order to ensure that the appropriate densities are secured with consideration of site character and other constraints / opportunities. As detailed in the Development Statement submitted in respect of Matter 4, the Illustrative Masterplan for the Chapel Lane site indicates approximately 4.1ha of development area within the red line, This could deliver up to 150 dwellings at a maximum density of 37 dph. This is an appropriate dwelling density for a 100% affordable housing development, which potentially has capacity to include small apartment buildings and a higher proportion of 2-3 bed dwellings, and which is significantly enclosed by vegetation, ensuring that the development will have extremely limited visibility within its context. As there is significant 'blue' land available for uses associated with the proposed development, including sensitively designed POS provision, there is an opportunity for the development potential of the, less sensitive, red line area to be maximised.

Comments on Soundness in respect of Issue 1

2.13 When considering the tests of soundness set out in Paragraph 35 of the NPPF in the context of Issue 1 of Matter 3, the Plan as submitted is not sound in so far as it is **not justified** and **not effective** for the following reasons:

2.14 The Council's approach to site allocations is not an appropriate strategy because it focuses too heavily on larger, brownfield sites which risk not delivering quickly and not delivering enough affordable housing in particular.

2.15 An implication of the Council's brownfield first approach and focus on larger, strategic sites is that the anticipated housing supply will not be deliverable over the plan period or within the first five years of the plan period.

- 2.16 In order to make the plan sound in this regard, SHMBC should:
- I) Include a more appropriate mix of sites (brownfield and greenfield sites across a range of sizes and locations) as housing allocations to meet its housing requirement;
 - II) Allocate more viable housing sites to ensure that both affordable housing need and associated infrastructure requirements are met.
- 2.17 Further details on the deliverability of the Chapel Lane site, including a detailed Development Statement are provided in Lovell's Hearing Statement for Matter 4.

Issue 2: Green Belt and Exceptional Circumstances

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)?

- 2.18 Paragraph 11 (b) of the NPPF states that:

“strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

- 2.19 St Helens Borough is tightly constrained by the Green Belt and the Green Belt boundaries in St Helens have remained substantially unchanged since being originally designated in 1983 (almost 40 years ago). The Green Belt in the Borough covers most of the countryside around its main towns and villages, and also ‘washes over’ individual buildings and small settlements. In many locations the Green Belt boundary tightly follows the edge of existing built up areas. The Local Plan proposes to release land from the Green Belt to enable the needs for housing and employment development to be met in full over the Plan period in the most sustainable locations. Other land is proposed to be removed from the Green Belt and safeguarded to allow for longer term housing and / or employment needs to be met beyond the Plan period.
- 2.20 Lovell's strongly held view is that the presence of Green Belt does not provide a reason for restricting the overall scale of development proposed by the Plan and that Green Belt release is necessary in appropriate locations in order to meet the Borough's open market and affordable housing and employment needs.
- 2.21 Any alternative that does not meet housing and employment needs during the Plan period would not deliver the strategic objectives of the Plan which include supporting regeneration and balanced economic growth and meeting housing needs within the Borough.

- 2.22 There are exceptional circumstances to justify further changes to the Green Belt boundaries – see our response to question 4 immediately below.

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

- 2.23 Paragraph 136 of the NPPF states that once the general extent of a Green Belt has been established, it should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans having regard to their intended permanence in the long term, so they can endure beyond the plan period.
- 2.24 The Green Belt Review (December 2018) sets out clearly the Council's position that exceptional circumstances exist to justify changes to the Green Belt boundaries which are as follows:
- I) The St.Helens Unitary Development Plan (1998) and the St Helens Core Strategy (2012) both aimed to focus most new development onto previously developed land in urban areas. The Core Strategy states that 80% of new housing developed between 2003 and 2027 should be built on such land. However, the Core Strategy identified a potential need for Green Belt release to meet needs for new housing from 2022 onwards.
 - II) Substantial shortfalls have been identified in the overall quantity, quality and range of sites within existing urban areas that can be made available for housing and employment development over the Local Plan period, both within the Borough and in other nearby locations.
- 2.25 Due to the lack of sufficient capacity on these sites to meet needs, and the lack of any scope to help meet the Borough's needs in any neighbouring district, some sites on the edges of existing settlements are proposed to be removed from the Green Belt and allocated for development in the period up to 2035. Some other sites are proposed to be removed from the Green Belt but, rather than being allocated for development, have been safeguarded to meet potential longer term development needs after 2035.
- 2.26 Lovell fully agrees with the Council's conclusion that exceptional circumstances exist to justify the release of land from the Green Belt. The Council's approach to identifying both allocated and safeguarded sites to attempt to ensure that the changes to the Green Belt can endure well beyond the Plan period will only be consistent with national policy, if it ensures that the needs are actually met (NPPF paragraphs 35a and 35c).
- 2.27 For reasons set out in further detail in Lovell's response to Matter 4, Lovell does not consider that the proposed allocations are sufficient or will be effective at meeting the Borough's overall housing needs and particularly affordable housing needs and therefore suitable sites proposed for safeguarding, such as the Chapel Lane site, should be upgraded to allocations to ensure that this need is met.

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?

2.28 It is Lovell's view that the quantum of proposed Green Belt release has not been supported by proportionate evidence. Whilst the Council has sought to maximise the use of brownfield sites before looking to the Green Belt, in doing so it has neglected to allocate a sufficient mix of sites to ensure that sites will both deliver early in the plan period and meet affordable housing needs as demonstrated in Lovell's response to Question 1 above.

2.29 Furthermore, Lovell does not agree that the housing requirement is justified for the reasons set out in detail in Lovell's Hearing Statements for Matter 2. In summary, Tetlow King's analysis of affordable housing supply identifies a huge deficiency in the supply of affordable homes to be delivered during the Plan period. Taking into account backlog needs accrued since 2016, there is a clear need for at least 176 net affordable homes per annum for the five-year period between 2020/21 and 2024/25.⁴ Lovell considers that in order to achieve both its economic growth aspirations and to ensure its housing needs are met, it is appropriate for St Helens to plan for a higher level of need by substantially increasing the overall housing requirement and to allocate additional sites that are deliverable and can deliver policy compliant affordable housing, or better such as the Chapel Lane site which would be capable of delivering 100% affordable housing in the first 5 years of the plan period.

6. On a Boroughwide level is the methodology for Green Belt assessment robust and reasonably consistent with that used by adjoining authorities?

2.30 The Government has not set any prescribed approach for LPAs to follow when undertaking a Green Belt Review. The Council's Preferred Options consultation, which was undertaken in 2016, was supported by a Draft Green Belt Review 2016 ('the 2016 Green Belt Review'), the findings of which were used to inform the Council's then preferred options for Green Belt release. The 2016 Green Belt Review methodology comprised the following:

- Stage 1: Green Belt Parcel Assessment of all the Green Belt in St. Helens against the five purposes (99 parcels);
- Stage 2: Site Assessment of Prohibitive Constraints;
- Stage 3A: Constraints Assessment;
- Stage 3B: Accessibility Assessment;
- Stage 3C: Developability Assessment;
- Stage 4: Site Summary.

⁴ Tetlow King Report para. 4.14

- 2.31 As shown on the Map of combined Stage 1 Green Belt parcels assessment and associated site proforma contained at **Appendix I**, the Chapel Lane site was assessed at Stage 1 of the 2016 Green Belt Review as part of a wider parcel (Ref: GBP_082) also incorporating further land to the south and west (Site Refs: GBS_049 and GBS_111). The Stage 1B Parcel Assessment score for parcel ref: GBP_082 gave a score of 'Medium' against all 3 purposes assessed (Purposes 1, 2 and 3) and an overall significance score of 'Medium'.
- 2.32 The site was then assessed in isolation (Site Ref: GBS_140) through the subsequent Stages 2 and 3 which included the following assessment:
- Landscape - Woodland trees provide significant visual amenity value. Provided these are retained the landscape impact would be low.
 - Ecology - Western side of site is affected by a large TPO and borders LWS.
 - Heritage - Northern portion of the site falls within the 200m buffer of an ancient monument.
 - Other Constraints - Small part of the site in FZ2 and 3.
 - Highways Access - Suitable access possible subject impacts on trees being addressed.
 - Sustainable Access - Good accessibility.
 - Viability – Good Viability.
- 2.33 The Stage 4 site summary concluded that the Chapel Lane site ranks 1 of 3 in the hierarchy of the other sites within the parcel (sites GBS_049 and GBS_111) and that the impact on Green Belt if the site is allocated would be **low**. It concluded that there will be **low Green Belt impact** provided woodland is preserved which screens the site from the west and that the site should be promoted for allocation.
- 2.34 The red line boundary for site GBS_140 included the whole site including the woodland area.
- 2.35 Further to the 2016 Green Belt Review, a subsequent Green Belt Review (December 2018) ('the 2018 Green Belt Review') was undertaken which the Council states (within Chapter 2 of the 2018 Green Belt Review), followed a similar step-by-step approach as follows:
- Stage 1a – Identification of Green Belt parcels and sub-parcels;
 - Stage 1b – Assessment of parcels and sub-parcels against Green Belt purposes;
 - Stage 2a – Identification of parcels and sub-parcels with prohibitive constraints;
 - Stage 2b – Assessment of development potential within remaining parcels and sub-parcels;
 - Stage 3 – Ranking and review of results.
- 2.36 Stage 2b assessed various attributes of each parcel/sub-parcel to form an understanding of the likelihood or otherwise of them coming forward for development if released from the Green

Belt including consideration of physical or policy constraints and transport accessibility. A total of 69 parcels and sub-parcels were assessed at Stage 2B. Of these:

- 18 were identified as having 'good' development potential;
- 11 were identified as having 'medium' development potential; and
- 40 were identified as having 'limited' development potential.

2.37 The Council then attributed an overall numerical score, by adding the score for Stage 2B to that for Stage 1B in accordance with the ranking tables below (included at paragraphs 2.54 and 2.55 and Table 2.10 of the 2018 Green Belt Review).

Overall significance of the parcel/sub-parcel to the 3 Green Belt purposes assessed in the Review	Score attributed
Low	3
Medium	2
High	1
High +	0

Overall development potential of the parcel/sub-parcel	Score attributed
Good	3
Medium	2
Limited	1

Table 2.10: Tier ranking of overall scores

Tier number	Overall score from stages 1B and 2A
1	6
2	5
3	4 (excluding parcels/sub-parcels scoring only 1 for either of Stages 1B or 2B)
4	Other parcels/sub-parcels scoring 4
5	3
6	2
7	1

2.38 Within the 2018 Green Belt Review, the site (Parcel Ref: GBP_082a - Land East of Chapel Lane and South of Walkers Lane, Sutton Manor), the site was assessed again. At Stage 1b (Purposes of the Green Belt) it scored 'Low' and at Stage 2b (Developability Assessment) it scored 'Medium'.

2.39 The Chapel Lane site was given an overall score of 5 (just one point below all of the sites that were allocated).

2.40 However, whilst the Council includes detailed pro-formas for individual sites assessed for Stage 1b of the review, all that is included for Stage 2b is a template pro-forma (At Appendix F) that lists several considerations that will be taken into account when carrying out the Stage 2b developability assessment (including suitability, transport accessibility, availability, and

achievability). The template pro-forma is included at **Appendix II** of this statement for reference.

2.41 Therefore, without any evidence or justification presented as to how the Council has arrived at its tier ranking scores in Table 2.10, it is impossible to assess whether these scores are robust and/or justified for each site, or indeed whether the scores have been retrofitted to match the Council's proposed allocations.

2.42 What is absolutely clear to Lovell, is that the developability score of 'medium' or '2' for the Chapel Lane site, is incorrect. The only apparent justification for the Council's decision to safeguard the site, rather than allocate it for housing within the plan period, is provided in the commentary in Table 5.4 (at page 111 of the 2018 Green Belt Review) which states that:

"The sub-parcel was proposed by the Council as an allocated housing site at LPPO stage. However, its characteristics, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to it."

2.43 The commentary then goes on to state that the site is:

"further from the nearest local centre than is the case for example for the nearby parcel GBP_080. It is now seen as being more suitable to form a longer term extension of the urban area, which could contribute to meeting housing needs after the end of the Plan period."

2.44 The main justification for this downgrading therefore appears to be that it is a result of the reduced overall housing requirement for the Borough and due to the site's proximity to the nearest Local Centre when compared to Site 5HA. However, as demonstrated in the Development Statement attached to Lovell's response to Matter 4, the site is in a sustainable location within walking distance of local services. For example, there is a general store approximately 0.6km to the east of the site on Feeny Street and a Texaco Garage with Spar store approximately 0.8km to the east of the site on the B5419. Furthermore, there is no evidence or justification as to how the Council has assessed the site at stage 2b against over 60 other considerations listed in the template pro-forma at **Appendix II**.

2.45 Lovell strongly disputes the Council's overall score of '5' for the site and its decision to discount the site on this basis given the site's highly sustainable and accessible location and overall 'good' development potential, which is further demonstrated in the detailed Development Statement provided in Lovell's Hearing Statement for Matter 4.

2.46 Furthermore, as shown in the site assessment summary enclosed at **Appendix III**, the red line boundary for Parcel ref: GBP 082a covers the same area as the red line previously assessed under the 2016 Green Belt Review. However, as a result of representations made previously by the landowner, the woodland area in the middle of the site has been excluded from the part of the site that is proposed to be safeguarded. Lovell is supportive of the boundary of this part of site to be safeguarded as this will provide SHMBC with the comfort and clarity that the

remainder of the site i.e. the wooded area will not only be preserved but will remain within the Green Belt and thus be subject to the strict policy restrictions that a Green Belt designation affords. As demonstrated in the Development Statement which forms part of Lovell's Hearing Statement for Matter 4, the woodland area within the site is proposed for retention as well as the provision of adequate buffers between this area and the development.

Comments on Soundness in respect of Issue 2

2.47 When considering the tests of soundness set out in Paragraph 35 of the NPPF in the context of Issue 2 of Matter 3, the Plan as drafted is not sound.

2.48 The Council has demonstrated that, overall, there are exceptional circumstances to justify changes to the Green Belt boundary. However, its approach to site selection through the Green Belt Reviews has not been robust, particularly in relation to the Chapel Lane site. Therefore, the plan as submitted is not sound because it is not justified or effective:

- I) There is a distinct lack of justification within the 2018 Green Belt Review as to why the Chapel Lane site scored only 'Medium' on deliverability and has been downgraded from an allocation to a safeguarded site;
- II) The 2016 Green Belt Review assessed the entire site and concluded that there would be low Green Belt impact provided woodland is preserved which screens the site from the west and that the site should be promoted for allocation;
- III) Within the 2018 Green Belt Review, the Council appears to have changed its conclusions in respect of the site without reasonable evidence to justify this. The concerns as to the site's features are not justified. The context of the overall reduction in housing numbers does not provide a basis for reaching a different view on the site's inherent sustainability. There has been no material change in circumstances. The site's suitability for Green Belt release has actually been strengthened between the 2016 and 2018 Green Belt Reviews as the proposed safeguarded site boundary now excludes the brook and woodland area. This means that the potential developable area has been reduced. Masterplanning shows that buffers can also be included, such that the woodland and areas immediately abutting the brook will remain undeveloped. Furthermore, Lovell has an additional parcel of land adjacent to the site which will remain in the Green Belt and will provide further compensatory benefits in the context of Paragraph 138 of the NPPF.

2.49 In order to make the plan sound in this regard, SHMBC should revisit the 2018 Green Belt Review and update their assessment / conclusions based upon the robust evidence of the site's 'good' development potential and what Lovell is proposing at the site i.e. consider the retention of the woodland and suitable buffer which will ensure a strong level of visual containment. In doing so, the Chapel Lane site should be upgraded to an allocation as per the recommendations of the 2016 Green Belt Review to ensure that SHMBC's housing and

affordable housing needs are met. The site should be scored '6' overall and allocated for housing within the plan period.

Issue 3: The principle of safeguarded land being identified to meet longer-term development needs

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

- 2.50 NPPF paragraph 139c states that when defining Green Belt boundaries, plans should 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.
- 2.51 8 sites are proposed to be removed from the Green Belt and safeguarded to meet potential housing development needs after 2035, including the site at Chapel Lane (Site 6HS). Policy LPA06 (Safeguarded Land) makes clear that the sites identified as Safeguarded Land on the Policies Map have been removed from the Green Belt in order to meet longer term development needs well beyond the Plan period and that planning permission for the development of the safeguarded sites will only be granted following a future Local Plan review that proposes such development.
- 2.52 Lovell do not oppose safeguarding in principle. The decision to include safeguarded sites and the overall quantum of safeguarded sites identified is an attempt to ensure that the new Green Belt boundaries should not need to be revised again for a substantial period after 2035.
- 2.53 However, in certain cases, including Chapel Lane, safeguarding is the wrong approach. Allocation is the appropriate way forward. Our analysis concludes that the 10 proposed Local Plan allocations and the other claimed sources of supply in the Council's trajectory will deliver significantly fewer dwellings than the Council claims in the 5 year supply (Document ref: SHBC004 – Appendix 2 - Trajectory), and in particular will deliver far fewer affordable dwellings than are needed to meet the overriding need in the Borough (see Lovell's Hearing Statement for Matter 4).
- 2.54 Therefore, as currently submitted, the Council will not be able to demonstrate a 5 year supply upon adoption of the plan and will therefore need to allocate additional deliverable sites such as the Chapel Lane site to meet immediate rather than longer term development needs, including affordable housing need.

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

- 2.55 We echo our response above at Question 5.
- 2.56 In its response to the Inspectors' preliminary questions (PQ45) (Document reference: SHBC001), the Council stated that in the absence of national guidance, the Council have sought to use a practical and balanced approach to the designation of safeguarded land.

However, as referenced in the Council's response to PQ45, it has not used a specific methodology for calculating post-plan period needs and has instead undertaken what we would respectfully describe as a somewhat rudimentary calculation. This takes the estimated combined capacity of the sites safeguarded for housing and gives a rough figure of between 5.4 and 6.5 years supply.

2.57 Whilst the Council has sought to identify an amount of land to be safeguarded in order to meet future development needs and avoid further changes to the Green Belt boundary, the overall supply of housing land identified is insufficient to meet both the Borough's overall housing need and specifically its affordable housing need.

2.58 As such, as a suitable and deliverable site, the Chapel Lane site should be allocated now to ensure that shorter term development needs are met. Therefore, it may be necessary to identify additional safeguarded sites to ensure an adequate quantum is provided (see Lovell's Hearing Statement for Matter 4).

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

2.59 Lovell is generally supportive of the distribution and location of the sites proposed to be safeguarded and notes that an appropriate distribution of the sites in sustainable locations across the Borough should be sought. The Chapel Lane site is sustainably located in proximity to a range of local facilities and services, public transport links and employment opportunities.

2.60 In addition, as detailed in Tetlow King's Affordable Housing Statement (January 2021) the Bold ward (where the Chapel Lane site is located) includes some of the most deprived areas, being within the most 1% deprived nationally. Furthermore, this must be viewed in the context of the 6,444 households on the Housing Register in St Helens, a 26% increase just since the previous year's figure, plus the increase in house prices in both St Helens and Bold. As such, the Chapel Lane site is also ideally located to meet specific local affordable housing need within the Bold ward. However, for these reasons coupled with the huge deficiency in affordable housing land supply and no effective strategy to address this, the site at Chapel Lane should be allocated now in order to contribute to meeting this need in the short term.

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

2.61 Lovell considers that the policy wording of Policy LPA06 (Safeguarded Land) is generally consistent with the NPPF in that it seeks to identify sites to be removed from the Green Belt in order to meet longer term development needs well beyond the Plan period, subject to its overarching submission that it seeks a modification to convert this to an allocation. Lovell therefore requests that site 6HS be removed from the list of safeguarded sites identified in Policy LPA06 and subsequently added to Policy LPA05 as a proposed allocation.

Comments on Soundness in respect of Issue 3

- 2.62 When considering the tests of soundness set out in Paragraph 35 of the NPPF in the context of Issue 3 of Matter 3, the Plan as submitted risks being found not sound i.e **not positively prepared, not justified, not effective and not consistent with national policy** for the following reasons:
- I) The Council has identified a number of safeguarded sites to meet development needs beyond the plan period however these have been identified based on a somewhat basic calculation of estimated supply and capacity;
 - II) In order to meet its housing during the plan period, and specifically chronic affordable housing need, the Council needs to allocate additional sites for housing to come forward during the plan period, prioritising proposed safeguarded sites, such as the Chapel Lane site, which have already been identified by the Council as suitable for Green Belt release.
- 2.63 In order to make the plan sound in this regard, the Council should allocate additional sites, such as the Chapel Lane site, to ensure that the Borough's needs for housing, including affordable housing, can be met during the plan period.
- 2.64 It should then calculate the remaining supply of safeguarded sites and ensure that this is sufficient to meet the Borough's needs beyond the plan period, thus enabling the Green Belt boundaries to endure.
- 2.65 If following this exercise, there is insufficient capacity within the proposed safeguarded sites to meet the projected need then further safeguarded sites should be identified for removal from the Green Belt through the plan.

Issue 4: Compensatory improvements to Green Belt land

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

- 2.66 NPPF paragraph 138 requires that Plans 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.
- 2.67 As detailed in the Council's response to the Inspectors' Preliminary Questions (PQ47), the Council's proposed strategic compensatory improvement to offset the impact of removing land from the Green Belt is the implementation of the Bold Forest Park AAP (2017). The BFP Area Action Plan (AAP) forms part of the St. Helens Development Plan and provides a framework for the development of the BFP area which occupies an area of 1,800 hectares of Green Belt land in the southern-most part of St Helens Borough. The Council's response to PQ47 also states:

“Compensatory improvements will be also addressed on a site by site basis with the main compensatory improvements likely to take the form of 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...policies within the BFP AAP seek to ensure that new development in the BFP contributes to the further enhancement of the BFP, including improving connectivity between the Borough’s urban area and the Forest Park and contributing financially to the infrastructure of the park. “

- 2.68 The Chapel Lane site is within the Bold Forest Park and provides the opportunity to contribute to the objectives of the Bold Forest AAP and thus the Council’s overall strategy for Green Belt compensation, creating a development with an on-site greenspace network and connections to a wider functional greenspace network as well as contributing financially to the infrastructure of the park, where appropriate (see Lovell’s Hearing Statement for Matter 4).
- 2.69 The Council’s proposed allocations which are intended to contribute to the Bold Forest Park are not anticipated to deliver during the early years of the Plan period. For example, according to the Council’s own trajectory, Site 4HA will not deliver until 2029 onwards and Site 5HA will not deliver until 2024 onwards. In contrast, the site at Chapel Lane would deliver early in the plan period and contribute to the Bold Forest Park AAP objectives (see Lovell’s Hearing Statement for Matter 4).
- 2.70 Furthermore, the Chapel Lane site also includes an additional 1.6 ha field to the south which will provide Green Belt compensation in the form of ecological improvements to provide biodiversity net gain, and publicly accessible green infrastructure and open space. Further details of this are set out in the detailed Development Statement provided in Lovell’s Hearing Statement for Matter 4.

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?

- 2.71 The Chapel Lane site offers a unique opportunity to contribute towards meeting the objectives of the AAP and the Council’s strategy for Green Belt compensation. The Council has set out in its response to PQ47 how compensatory improvements will be achieved. However, as the Inspectors note in PQ47, there is currently no policy wording within the plan (as submitted) which sets out what these improvements will be or how they will be secured.

Comments on Soundness in respect of Issue 4

- 2.72 When considering the tests of soundness set out in Paragraph 35 of the NPPF in the context of Issue 4 of Matter 3, the Plan as drafted is not sound in so far as it is **not effective** and **not**

consistent with national policy because there is not currently any policy mechanism contained within the plan which sets out how the proposed compensatory Green Belt improvements will be achieved to offset against the loss of Green Belt land.

- 2.73 In order to make the plan sound in this regard, the Council should insert a specific policy into the plan which sets out clearly how Green Belt compensation will be secured and how the Bold Forest Park is proposed to be delivered, with reference to the adopted AAP, either through developer contributions to deliver the strategic objectives, or through on-site measures to complement and assist on delivering the wider action plan and its objectives.
- 2.74 The Chapel Lane site should be allocated for housing under Policy LPA05 and the policy wording amended to specifically reference the site.

Issue 5: The spatial distribution

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

- 2.75 Policy LPA02 (Spatial Strategy) identifies a number of key settlements (namely St.Helens Core Area, Blackbrook and Haydock, Newton-le-Willows and Earlestown, Rainford, Billinge, Garswood and Rainhill) for the focusing of regeneration and growth. However, concerns have been expressed that the distribution of development through allocations does not reflect the size and sustainability of settlements or that allocations are on the periphery of these key settlements.
- 2.76 Lovell consider that the identification of a range of key settlements dispersed across the Borough is generally appropriate however Policy LPA02 does not set out a clear settlement hierarchy as may be ordinarily expected from such a policy. It is also not clear from the Local Plan or evidence base documents how these settlements have been identified and assessed. Lovell generally agrees with the overarching principles of Policy LPA02, namely that new development should 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.
- 2.77 According to Figure 4.1 (Key Settlements Plan) contained within the Local Plan, the Chapel Lane site appears to sit within / on the edge of the St Helens Core Area. Lovell agrees with this categorisation which reflects the site's sustainable location on the edge of the existing urban area. It is Lovell's view, that the Chapel Lane site is a suitable location for modest housing growth. It is a medium sized site which has minimal infrastructure or other technical requirements when compared to some of the larger strategic allocations proposed and thus will be deliverable early in the Plan period (see further Lovell's Hearing Statement for Matter 4).

Conclusions on Soundness in respect of Issue 5

- 2.78 When considering the tests of soundness set out in Paragraph 35 of the NPPF, the overall spatial distribution in terms of settlements is considered by Lovell to be justified and therefore contributes to the soundness of the plan.
- 2.79 However, as part of the spatial distribution of sites allocated for residential development, the Chapel Lane site should be allocated to provide a more appropriate mix in terms of size and nature of site in this part of the Borough.

Issue 6: Site Selection

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

- 2.80 Please refer to Lovell's detailed response to Question 6 above. In summary, whilst the Council has demonstrated that exceptional circumstances exist to justify changes to the Green Belt boundary, its approach to site selection through the Green Belt Reviews has not been robust, particularly in relation to the Chapel Lane site.

Conclusions on Soundness in respect of Issue 6

- 2.81 Please refer to Lovell's detailed response to Question 6 above. In summary, there is a distinct lack of justification within the 2018 Green Belt Review as to why the Chapel Lane site was downgraded from an allocation to a safeguarded site. In order to make the plan sound in this regard, the Chapel Lane site should be upgraded to an allocation as per the recommendations of the 2016 Green Belt Review to ensure that SHMBC's housing and affordable housing needs are met.

Issue 7: Policies LPA03 and LPA01

16. Is Policy LPA03 consistent with national policy and effective?

- 2.82 Policy LPA03 (Development Principles) sets out development principles that form the basis for more detailed policies of the Plan.
- 2.83 Lovell generally supports the development principles in Policy LPA03 which represent a sustainable and balanced approach to the provision of new development and are consistent with the aspirations and requirements of the NPPF. These include (with corresponding NPPF Chapter): creating sustainable communities with a strong sense of place (Chapter 12); providing for a mix of types and tenures of quality homes to meet the needs and aspirations of all existing and future residents in sustainable locations (Chapter 5); improving the economic well-being of the Borough's residents (Chapter 6); contributing to a high-quality built and natural environment (Chapter 15); maximising sustainable transport (Chapter 9); promoting healthy communities (Chapter 8) and adapting to climate change (Chapter 14).

17. Is Policy LPA01 necessary for the soundness of the Plan?

- 2.84 Policy LPA01 (Presumption in Favour of Sustainable Development) replicates Paragraph 11 of the NPPF which sets out the presumption in favour of sustainable development. However, the PPG⁵ advises that *'there is no need for a plan to directly replicate the wording in paragraph 11 in a policy'*. The Council has agreed to delete the policy.
- 2.85 Lovell does not have any specific comments to make on this question however is in general agreement with the deletion of the policy given that PPG makes clear that the presumption in favour of sustainable development is adequately covered in the NPPF and does therefore not need to be replicated in Local Plans.

⁵ Reference ID: 61-036-20190723

APPENDIX I

2016 Green Belt Review Extract

SITE REF: GBS_140

Site Name	Land East of Chapel Lane
Post code	WA9 4AQ
Ward	Bold
Size	7.33 hectares
Description	Site contains a large woodland area to the south and west with the remainder is a agricultural field

PARCEL REF: GBP_082

STAGE 1B PARCEL ASSESSMENT SCORES

Purpose 1	Purpose 2	Purpose 3
Medium	Medium	Medium
Overall significance	Medium	

STAGE 2 SITE ASSESSMENT OF PROHIBITIVE CONSTRAINTS

Prohibitive constraints present	
None	
Carry forward to Stage 3 Assessment?	Yes



SITE REF: GBS_140

STAGE 3A CONSTRAINTS ASSESSMENT

Landscape	
Woodland trees provide significant visual amenity value. Provided these are retained the landscape impact would be low.	
Ecology	
Western side of site is affected by a large TPO and borders LWS	
Heritage	
Northern portion of the site falls within the 200m buffer of an ancient monument	
Other constraints	
Small part of the site in FZ2 and 3.	

STAGE 3B ACCESSIBILITY ASSESSMENT

Highways access	
Suitable access possible subject impacts on trees being addressed.	
Sustainable access	
Good accessibility.	

STAGE 3C DEVELOPABILITY ASSESSMENT

Ownership	Single ownership
Gross developable area	4.25 hectares
Net developable area	3.19 hectares
Preferred main use	Residential
Notional development capacity	95
Viability	Good viability.

STAGE 4 SITE SUMMARY

Other sites with parcel	GBS_049, GBS_111, GBS_140
Hierarchy within parcel	1 of 3
Impact on Green Belt if site is allocated	Low
Conclusion	Low Green Belt impact provided woodland is preserved which screens the site from the west.
Promote for allocation	Yes

APPENDIX II

Stage 2b Template Site Proforma

APPENDIX F

TEMPLATE PROFORMA USED AT STAGE 2B

STAGE 2b DEVELOPABILITY ASSESSMENT (*Different proforma required for each parcel – where different sub-parcels within the parcel have different characteristics ensure these are reflected in comments and summary boxes; also ensure a separate gross and net developable area and notional development capacity is given for any sub-parcels*)

Parcel Ref and Location	
Sub-parcels discounted at stages 1B or 2A	<i>Identify here any sub-parcels which were discounted at previous stages</i>
Area covered by stage 2B assessment	<i>List here the remaining sub-parcels, which are subject to stage 2B i.e. which have not been discounted at earlier stages – if no sub-parcels discounted at earlier stages state 'Whole of parcel'</i>

Insert half page plan of parcel including any sub parcels (shade over any of these that have been excluded at Stage 1B or 2A).

SUITABILITY

<u>Constraint type</u>	<u>Characteristics of each parcel/sub-parcel considered in relation to each constraint</u>	<u>Primary data sources</u>
Landscape and visual character	<ul style="list-style-type: none"> • <i>What is the character of the landscape within the parcel and its surroundings?</i> • <i>How sensitive to change is the landscape?</i> • <i>How sensitive to visual intrusion is the area?</i> • <i>Would any development lead to enhancement of a derelict or previously developed site?</i> • <i>See criteria for SA objective 7 for further guidance</i> 	<i>St.Helens Borough Landscape Assessment 2006 – see maps on landscape character, landscape sensitivity and visual sensitivity</i>
Ecology	<ul style="list-style-type: none"> • <i>Is the parcel/sub-parcel within 400 metres of a Site of Special Scientific Interest or within 100 metres of a Local Wildlife Site, Local Geological Site or Local Nature Reserve?</i> • <i>If the parcel/sub-parcel contains one of the above designations, how much of it is affected?</i> • <i>How susceptible is the specific ecological interest in the designated site to damage/loss by development?</i> • <i>Is there any known presence of protected species and/or habitats on or close to the parcel/sub-parcel?</i> • <i>See criteria for SA objective 1 for further guidance</i> 	<i>Maps of Sites of Special Scientific Interest; Local Wildlife Sites; Local Nature Reserves Local Wildlife Site details</i>
Agricultural Land Quality	<ul style="list-style-type: none"> • <i>Is land within the parcel/sub-parcel recorded as being grade 1, 2, 3a, 3b, 4 or 5?</i> • <i>Where different grades of land are present, what is the approximate proportion of each grade?</i> • <i>See criteria for SA objective 2 for further guidance</i> 	<i>Agricultural Land classification maps (published by Natural England)</i>
Heritage Assets	<ul style="list-style-type: none"> • <i>Would development of the site be likely to affect the character, appearance or setting of any designated (or non-designated)</i> 	<i>Maps showing Listed Buildings, Scheduled Monuments, Registered Parks and Gardens,</i>

<u>Constraint type</u>	<u>Characteristics of each parcel/sub-parcel considered in relation to each constraint</u>	<u>Primary data sources</u>
	<p>heritage asset?</p> <ul style="list-style-type: none"> • What is the significance of any identified heritage asset within or adjacent to the parcel/sub-parcel? • How susceptible is the affected asset to effects of new development? • What proportion of the parcel/sub-parcel is affected by the asset or its setting? • Does the site have any known substantial archaeological interest? • See criteria for SA objective 8 for further guidance 	<p>Conservation Areas Archaeological information Conservation Area Appraisals Listing details for Listed Buildings</p>
Flooding	<ul style="list-style-type: none"> • What fluvial flood zone is the parcel/sub-parcel located within? • What proportion of the parcel/sub-parcel (if any) is in zones 2 or 3? • What effect will climate change have on any flood risk affecting the site? • Is there any substantial known flood risk from other sources including surface water? • See criteria for SA objective 6 for further guidance 	<p>Environment Agency Flood Zone maps St.Helens Strategic Flood Risk Assessment 2014 Surface water flooding maps</p>
Trees and Woodland	<ul style="list-style-type: none"> • The extent of any TPOs or other important woodland/planted areas within the parcel/sub-parcel. • Does the parcel/sub-parcel contain any ancient woodland? • What contribution do any trees or woodlands which would be lost currently make to amenity in the area? • See criteria for SA objective 1 for further guidance 	<p>Maps of Tree Protection Orders (TPOs) and ancient woodland areas</p>
Open Space and Recreation	<ul style="list-style-type: none"> • The type of any open space and/or sporting facility within the parcel/sub-parcel. • Whether the parcel/sub-parcel is in an area of surplus or deficit for any specific provision which would be lost. • Any known proposals for replacement provision. • How close is the parcel/sub-parcel to public open space or natural greenspace in the surrounding area? • Whether the parcel/sub-parcel offers opportunities to contribute to enhancement of the Green Infrastructure network • See criteria for SA objectives 5 and 9 for further guidance 	<p>St.Helens Indoor and Built Sports Facilities Needs Assessment (2016) (including its Golf Course Addendum) St.Helens Open Space Assessment (2016) St.Helens Playing Pitch Strategy Assessment (2016) St.Helens Playing Pitch Strategy & Action Plan (2016) St.Helens Greenway Policy Review (2015) Maps of open space and recreation facilities</p>
Minerals	<ul style="list-style-type: none"> • Whether the parcel/sub-parcel is within a minerals safeguarding area and if so the proportion of the parcel/sub-parcel which is affected. 	<p>Minerals safeguarding maps</p>

<u>Constraint type</u>	<u>Characteristics of each parcel/sub-parcel considered in relation to each constraint</u>	<u>Primary data sources</u>
Infrastructure	<ul style="list-style-type: none"> • Whether the parcel/sub-parcel is affected by easements for pipelines etc. restricting development and if so to what extent. • Are there any known constraints concerning provision of utilities to the parcel/sub-parcel (water, sewerage etc.)? • Whether the parcel/sub-parcel is affected by future transport or other infrastructure projects. • Would any development be critically constrained by infrastructure issues (see criteria for SA objective 16)? 	Pipeline maps Future infrastructure proposals (e.g. transport schemes)
Ground conditions	<ul style="list-style-type: none"> • Whether the parcel/sub-parcel contains or is within 250 metres of an active or former landfill site. • Whether the parcel/sub-parcel is affected by any area of known contamination (within it or on adjacent land) • Is the parcel/sub-parcel within an area of known subsidence from mining or other source of ground instability? • See criteria for SA objective 4 for further guidance 	Landfill sites (Council records) Contaminated land (Council records) Coal Authority 'development risk' maps
Air, water and noise pollution	<ul style="list-style-type: none"> • Whether the parcel/sub-parcel is within or close to an Air Quality Management Area • Whether the site is located within 100m of a groundwater source protection zone 1 or 2 • Whether the parcel/sub-parcel would be affected by any existing sources of noise in the surrounding area • See criteria for SA objective 3 for further guidance 	Maps of AQMAs Environment Agency groundwater source protection zone maps
Hazardous installations	<ul style="list-style-type: none"> • Is the parcel/sub-parcel within any Health and Safety Executive (HSE) consultation zone alongside or around a hazardous installation? • If so, what proportion of the parcel/sub-parcel is affected? 	Maps of notifiable hazard locations
Neighbouring uses	<ul style="list-style-type: none"> • Would housing or employment use be compatible with nearby uses (existing or proposed)? • Would access to the site lead to amenity issues in the wider area? 	
Any other constraints		

TRANSPORT ACCESSIBILITY

(see also criteria for SA objectives 12, 13, 14, 19 and 20 for further guidance)

Walking	<ul style="list-style-type: none"> • Is the parcel/sub-parcel within 800 metres safe and convenient walking distance of a district or local centre? • If not what is the walking distance to such facilities? • Is the parcel within 400 metres, 400-1200 metres or 1200 metres+
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	<i>safe and convenient walking distance of a primary school? (1200m+ should be flagged up as an issue that needs considering further in the overall Developability section) See SA Criteria for SA Objective 13</i>
Cycling	<ul style="list-style-type: none"> • <i>Is the parcel/sub-parcel within 1 mile safe and convenient cycling distance of a district or local centre?</i> • <i>If not what is the cycling distance to such facilities?</i>
Public Transport	<ul style="list-style-type: none"> • <i>Is the parcel/sub-parcel within 400 metres safe and convenient walking distance of a bus stop with a reasonable range of services to different destinations?</i> • <i>Is it within 800 metres safe and convenient walking distance of a train station?</i> • <i>Is the parcel/ sub-parcel within a 40 minute journey by public transport to a secondary school?</i>
Vehicular Traffic	<ul style="list-style-type: none"> • <i>Can safe and convenient access be provided for all vehicles that are likely to use the parcel/sub-parcel to and from (a) the public highway and (b) the strategic road network?</i>

AVAILABILITY

Ownership	<i>Is parcel subject to current land owner interest in developing? If so, to what extent? This should take account of current landowner intentions. i.e. if only part of the parcel is being promoted then this should be stated.</i>
Existing use	
Current planning status	<i>i.e. planning permission; any relevant planning history</i>
Use(s) promoted by landowner(s)	<i>Insert housing, employment or both</i>

ACHIEVABILITY

Viability Considerations	<i>What viability zone (as identified in the EVA) does the parcel/sub-parcel fall within? Would any development be likely to be subject to abnormal costs?</i>
Gross Developable Area	<i>This should be provided for the whole parcel and any sub-parcels If only part of the parcel or sub parcel is being promoted for development by the landowner/developer then the GDA should be reduced to reflect this</i>
Net Developable Area	<i>As above</i>
Notional Development Capacity	<i>This should be provided for the whole parcel and any sub-parcels and state any assumptions used (e.g. 93-112 units at 75% net developable area and 25 /30 dph). This should take account of current landowner intentions as above.</i>

CONCLUSIONS ON DEVELOPABILITY

Summary of Developability Assessment	<i>Insert here key points from earlier sections (split by sub-parcel)</i>
Preferred use (to be considered in stage 3)	<i>Insert here whether to be considered for housing, employment or both and briefly why (split by sub-parcel if necessary)</i>
Notional development capacity (to be considered in stage 3)	<i>As above</i>
Developability Score	<i>Good, moderate or limited (Ensure a separate score is given for any sub-parcels)</i>

APPENDIX III

2018 Green Belt Review Extract

GBP_082a – Summary Sheet

Sub-parcel	GBP_082a	LPPO Ref:	HA4	Ward	Bold	
Location	Land East of Chapel Lane and south of Walkers Lane, Sutton Manor					
Plan						
Summary						
Stage 1b (Purposes of Green Belt)	Stage 2b (Developability Assessment)	Agricultural Land Classification	Overall Scores	Preferred Use	Residential Density (dph)	Net Developable Capacity (NDC)
Low	Medium	Grade 3	5	Housing	30	113
Consequential Changes		No				
Reason for Consequential Changes		N/A				
Designation		Safeguard				

Parcel/Sub-parcel ref. and location	Allocate, safeguard or discount	Comments on decision
		<p>transport, education and health facilities, and employment opportunities.</p> <p>In summary, the parcel has many positive attributes that support its allocation for development.</p>
<p>GBP_082a Land East of Chapel Lane and South of Walkers Lane, Sutton Manor</p>	<p>Safeguarded</p>	<p>Located to the south-west of Sutton Manor, this sub-parcel is bounded by existing housing to the east and north, and employment areas slightly further to the north and west.</p> <p>The sub-parcel was proposed by the Council as an allocated housing site at LPPO stage. However, its characteristics, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to it.</p> <p>The sub-parcel has a reasonable degree of visual self-containment, resulting from the presence of woodland around its boundaries facing the countryside. However, the sub-parcel projects notably outwards into the countryside from the current urban edge. It is also further from the nearest local centre than is the case for example for the nearby parcel GBP_080. It is now seen as being more suitable to form a longer term extension of the urban area, which could contribute to meeting housing needs after the end of the Plan period.</p> <p>The sub-parcel contains protected woodland and a LWS (Pendlebury Brook). A significant buffer would be required for both these areas to ensure their continued protection; an appropriate reduction in the NDA of the site would be applied to accommodate these assets.</p> <p>The sub-parcel could be accessed via Shakespeare Road or Chapel Lane. Whilst highway improvements are likely to be required, for example the widening of Chapel Lane and provision of</p>

Parcel/Sub- parcel ref. and location	Allocate, safeguard or discount	Comments on decision
		<p>footways, this would not preclude the development of the parcel in principle.</p> <p>In summary, the parcel has positive attributes that support its release from the Green Belt. However, it is now recommended to form a safeguarded site, to help meet post Plan period needs rather than an allocated site.</p>
GBP_082b Land south of Sutton Manor	Discounted	<p>Numerous constraints affect this sub-parcel that would severely limit its development potential.</p> <p>There are highway and access issues connected with the sub-parcel. Even if it is possible to provide an access in principle the number of dwellings capable of being built is likely to be limited by the need to avoid exceeding maximum cul-de-sac lengths.</p> <p>A protected LWS (Pendlebury Brook) runs through the sub-parcel, which would need to be protected. Some sections of the sub-parcel fall within flood zones 2 and 3. There are existing allotments which would have to be either retained or replaced elsewhere.</p> <p>A large section of the sub-parcel has not been promoted as a development location by any landowner. The location is not considered to be particularly sustainable due to its distance from the nearest local centre.</p> <p>When all the above constraints associated with the sub-parcel are considered cumulatively, it is clear that it would not be suitable as a potential development site to be released from Green Belt.</p>
GBP_082c Land north of Bell Lane, south of Sutton	Discounted	<p>This sub-parcel is on the southern edge of the urban area at Sutton Manor.</p> <p>Although it was proposed by the Council as a safeguarded site at LPP0 stage, a number of</p>