



**ST HELENS**  
BOROUGH COUNCIL

**ST HELENS BOROUGH  
LOCAL PLAN 2020-2035**

**ST HELENS BOROUGH COUNCIL'S RESPONSE  
TO INSPECTORS MATTERS ISSUES AND  
QUESTIONS**

**Matter 4 – Allocations, Safeguarded Land and  
Green belt Boundaries  
Bold, Eccleston, Sutton manor, Thatto Heath and  
St. Helens Core Area**

**SESSION 4 – 9:30 TUESDAY 8 JUNE 2021**

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## **Matter 4: Allocations, Safeguarded Land and Green Belt Boundaries - Bold, Ecclestone, Sutton Manor, Thatto Heath and St. Helens Core Area**

(Policies Covered: LPA04, LPA04.1, LPA05, LPA05.1, LPA06)

### **Issue 1: Omega South Western Extension (1EA) and Omega North Western extension (1ES)**

A planning application for the development of land including Omega South (1EA) has been the subject of a “call-in” inquiry and the decision of the Secretary of State is awaited<sup>1</sup>. The evidence to the inquiry addressed the question of whether there were very special circumstances to justify development in the Green Belt, including all the land use planning impacts which are relevant to that planning balance, such as landscape and visual impact; impact on biodiversity; highways and other matters including benefits.

The draft Statement of Common Ground (SoCG) with Warrington Council (“WBC”) (SD012 and SD012.1) states that WBC has agreed, in principle, that Omega South (1EA) will contribute to meeting Warrington’s employment needs subject to resolving access issues. Whilst the SoCG has not been signed, it has been used as a working document by St Helens Borough Council (“SHBC”), and WBC. WBC produced a position statement for the “call-in” inquiry which confirms that the proposed allocation would count towards meeting WBC’s employment land needs<sup>2</sup>.

WBC raised no objection to the “call-in” application (subject to the imposition of conditions and a Section 106 agreement). WBC support the allocation of this site as it forms the logical expansion space to Omega, which is now effectively at capacity. Omega is central to WBC’s extant development plan. It has been highly successful and its expansion should be supported.

#### *1. Do the Green Belt assessments support the allocation and safeguarded land and demonstrate exceptional circumstances for the removal of the land from the Green Belt?*

The current Green Belt boundaries were set in 1983. The Green Belt Review (“GBR”) provides a methodical selection process to identify and assess land on the basis that some land presently in the Green Belt will have to be released if the development needs of the Borough are to be met. The consequence is that the GBR is based on the premise that land must be identified for development and the assessment aims to

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<sup>1</sup> Application reference P/2020/0061/HYBR. The application site area is 75 ha and includes land to the west of the proposed allocation. The application is in part, to meet the specific requirements of TJ Morris (Home Bargains).

<sup>2</sup> The Position Statement is Omega Call-in Inquiry Core Document CD 43.73: [https://omegawestdocuments.com/media/documents/43/WBC%20POSITION%20STATEMENT%20St%20Helens.docx%20\(002\).pdf](https://omegawestdocuments.com/media/documents/43/WBC%20POSITION%20STATEMENT%20St%20Helens.docx%20(002).pdf)

identify the sites that are the least sensitive having regard to the role and purposes of the Green Belt, recognising that land proposed to be removed from the Green Belt has to be developable and deliverable. The exceptional circumstances are therefore at a strategic and site specific level. There is a need to meet employment land requirements in the Plan period and (potentially) beyond, there being no alternatives to land within the Green Belt. The analysis shows that the selected sites are those which are the least important to the aims and purposes of the Green Belt, whilst still being capable of meeting the identified need of the market in accordance with the spatial strategy.

### **Site 1EA:**

Site 1EA comprises sub-parcel GBP\_076C within the GBR. The Stage 1B assessment considers that the site has a “medium” contribution to the Green Belt purpose of checking the unrestricted sprawl of a large built-up area; a “medium” contribution to preventing the merging of neighbouring towns; and a “medium” contribution to the purpose of safeguarding the countryside from encroachment. The assessment of the overall significance of the sub-parcel is a “medium” score. The score is influenced by the adjacent large-scale built development at Omega South and the M62.

The Stage 2B assessment was that the site had “medium” development potential and an overall ranking score of 4. Five of the sites assessed had an overall score of 5. In each of these cases, the higher score was because the sites were considered to offer “good” development potential. One other sub-parcel had a score of 4. This is GBP\_40: Land west of M6 and south of A572 Southworth Road, Newton le Willows, where the impact on Green Belt purposes is rated as “low” but development potential is rated “limited”. Consequently, GBP\_40 is not proposed to be removed from the Green Belt in the LPSD. Following the five sites with a score of 5, site 1EA is the next best option to release from the Green Belt.

The site commentary in Table 5.2 of the GBR notes that this land would be a natural extension of the Omega employment area, which is located in Warrington. It states that WBC has confirmed that the site should be developed to help meet its needs for employment uses and reference is made to WBC’s Local Plan Development Option consultation document 2017 (paragraph 2.38) that the development of this land should ‘...contribute to meeting WBC’s employment land needs’. Circumstances have moved forward regarding the WBC Local Plan as a Proposed Submission Version Local Plan (“WBC PSVLP”) was subject to consultation in 2019. This relies on Site 1EA to meet employment needs arising in WBC.<sup>3</sup>

The GBR commentary notes that there are environmental constraints comprising protected woodland and the presence of some high quality agricultural land within the site. However, the protection of the woodland can be addressed at the application

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<sup>3</sup> See WBC PSVLP paras.3.3.21; 3.4.6; Table 6 – Employment Land Needs; paras 4.2.16; and 5.1.7. Policy DEV4 – Economic Growth and Development identifies Omega as a primary location for industrial, warehousing, distribution development and other B Class Uses and that major warehousing and distribution developments will be primarily directed towards Omega as a preferred location.

stage, and the loss of high quality agricultural land must be balanced against the benefits of providing needed employment land in this location.

The commentary also notes that the cumulative effects of development in this location would need to be addressed particularly with regard to Junction 8 of the M62, WBC (in its capacity as highway authority) have not raised any objections in principle to the allocation of this land. The highway issue, and the impact on junction 8, was resolved by the “call-in” application which was for a larger development than that which could be accommodated on Site 1EA alone.

The commentary refers to the SA which concluded that the development of the sub-parcel would have a mixed impact on the achievement of SA objectives. However, it notes that as the land is located within 1km of an area within the 20% most deprived population in the UK, its development for employment uses would help to reduce poverty and social exclusion. The evidence to the “call-in” application recognised that the Omega development has not had a positive impact on regeneration in St Helens<sup>4</sup>. However, an enhanced public transport provision, as required by Policy LPA04.1 (2)(d) and LPA04.1 (4), has the potential to make both the proposed jobs at Site 1EA, together with the existing ~10,000 jobs at Omega, accessible to the areas of multiple deprivation in St Helens for the first time. Further, the requirements of LPA04.1 (3) will maximise the training and employment opportunities for those living in the areas of multiple deprivation in St Helens.

The conclusion of the commentary within the GBR is that there are no other over-riding constraints that apply to the sub-parcel and it is suitable to be allocated and thereby help meet the employment land needs of WBC.

It should be noted that the “call-in” application was considered by the Council to demonstrate very special circumstances to justify development within the Green Belt. The application site is larger than Site 1EA and extends to the west (into sub-parcel GBP\_076B) which the GBR identifies as being more sensitive in terms of the role and purposes of the Green Belt than GBP\_075C/Site 1EA.

#### **Site 1ES:**

Site 1ES comprises sub-parcel GBP\_75D of the GBR. The Stage 1B assessment indicates that this parcel has a “medium” score for the contribution to checking the unrestricted sprawl of a large built-up area; a “medium” score in terms of the contribution of the parcel to preventing neighbouring towns from merging; and a “medium” score in assisting to safeguard the countryside from encroachment. The overall score of the significance on the parcel to Green Belt purposes is “medium”. This score is also influenced by the presence of the M62 and neighbouring large-scale development at Omega North. There is a contrast with other sub-parcels within area GBP\_075 which have overall scores of “high” and “high+”

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<sup>4</sup> See para.23, 24 and 64 of the closing submissions of Giles Cannock QC for SHBC (Omega Inquiry Doc. CD 44.13); and paras 182 and 276 of the closing submissions of Peter Goatley QC for the Applicant (Omega Inquiry Doc. CD 44.14) <https://www.omegawestdocuments.com/>

The Stage 2B assessment was that the site had “limited” development potential during the plan period because of highway and accessibility constraints. The sub-parcel has an overall ranking score of 3. The commentary set out in Table 5.2 of the GBR notes that the land has the potential to form a logical extension to the Omega employment area situated to the east of the site within Warrington. However, it refers to highway and accessibility constraints that would require mitigation including provision of access across land in a separate ownership outside the sub-parcel to the east. As Junction 8 of the M62 experiences congestion and capacity issues, the cumulative impacts of any development within this sub-parcel and elsewhere would need to be addressed in conjunction with WBC and Highways England.

The SA concluded that development of the parcel for employment use would have a mixed impact on the achievement of SA objectives. Such development would be likely to have a negative effect on biodiversity within the site, and conflict with efforts to make the best use of existing transport infrastructure, due to its lack of public transport links. However, development of the parcel would have positive effects on the local economy due to its location within 1km of an area of the 20% most deprived population in the UK. Development here would help to reduce poverty and social exclusion.

The commentary concludes by stating that the harm that would be caused by the loss of this land needs to be balanced against the potential benefits from providing further employment uses at this location. There are no other over-riding constraints that apply to the sub-parcel, and it is considered appropriate to safeguard it for potential future employment use after 2035 to help meet future needs of SHBC.

On the basis of the above, the Green Belt assessments have demonstrated the existence of exceptional circumstances to justify the release of these sites from the Green Belt.

*2. In relation to these exceptional circumstances, is Site 1EA justified to meet Warrington’s needs, having particular regard to the stage that Warrington’s LP has reached?*

Site 1EA is to meet the needs of WBC. The precise area of 31.2ha is not based on an employment land supply calculation and/or a specific request from WBC through the Duty to Cooperate. Rather, the 31.2ha reflects the land ownership of Homes England who responded to the Call for Sites exercise in March 2016. SHBC considered that this site was required to allow the expansion of Omega South and to meet the needs of WBC.

Omega is a strategic location for economic development in the Warrington Core Strategy (“WCS”). WCS Strategic Objective W1 and Policy CS 2 has sought to deliver 277 ha of employment land (2006-2027). This employment land supply is “primarily reliant on the Omega Strategic Location” (6.13). However, Omega is at capacity and it is therefore vital that further land is made available now in order to maintain continuity of supply up to 2027 and beyond.

WCS Policy CS 8 specifically concerns the Strategic Proposal – Omega and Lingley Mere, which are identified as the “primary locations for ongoing economic development” (6.28), which will contribute to the Borough’s future requirement for B1, B2 and B8 both within and beyond the Plan period (6.35). Fig 6.3 shows the Strategic Proposal, with a haul road leading to Site 1EA, suggesting that it would form the next logical phase of development in the next Plan period.

The evidence to the “call-in” inquiry referred to the WBC Proposed Submission Version Local Plan (“PSVLP”), and the work undertaken by the BE Group which has been commissioned by WBC<sup>5</sup>. The EDNA identified an employment OAN of 361.71ha (2017-2027) based on average land take-up of 13.88ha/pa. The realistic supply (2019) was just 83.91 ha. WBC PSVLP Policy DEV 4 seeks provision for a minimum of 362ha of employment land (2017-2037). Whilst the Plan has been paused, it is evident that in this context, WBC will need to release very significant amounts of Green Belt land to meet the minimum requirement for employment land in their next Plan period - at least circa 215 ha. Consistent with the extant WCS and the PSVLP, there are clear benefits in making provision to expand Omega, given its success as a strategic location and existing infrastructure (such as highway and energy infrastructure). It follows that there is a logic for land to be allocated in St Helens to support the expansion at Omega specifically.

The draft SoCG with WBC (SD012 and SD012.1) and the WBC PSVLP are unambiguous that Site 1EA is necessary to contribute towards meeting employment needs in Warrington. The allocation of the site is consistent with strategic policy pursued by WBC; it allows for a logical extension to a very successful location for economic development (there being no other options to extend); and the requirements of Policy LPA04.1 will generate benefits for St Helens residents by providing access to jobs and skills training. Whilst the proposed allocation is to meet the employment needs of WBC, benefits would be consistent with the regeneration objectives of the Local Plan.

*3. If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?*

Para. 1.18 of the GBR (SD020) explains that the need for employment uses over the Plan period cannot be met on non-Green Belt sites. No neighbouring district has been identified that can demonstrably help meet the need. The consequence is that land has to be found from sites in the St Helens Green Belt, outside the urban areas of the Borough.

Policy LPA02: Spatial Strategy, paragraph 4 indicates that land is removed from the Green Belt in order 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 removed from the Green Belt and safeguarded to allow for longer term employment

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<sup>5</sup> Evidence of Anthony Meulman of the BE Group to the “call-in” Inquiry (Omega Inquiry Core Doc. CD 39.2 and CD 39.2A: <https://www.omegawestdocuments.com/>)

needs to be met after the Plan period to ensure a continuity of supply. Paragraphs 4.6.4 to 4.6.6 of the Plan explain that there is an insufficient stock of employment land; that the Borough has an opportunity because of its strategic location; and that inward investment will create jobs, increase the rate of employment, and reduce out-commuting. Paragraphs 4.6.8 to 4.6.11 refer to the GBR, the requirement to release land from the Green Belt and that land to be removed from the Green Belt has been selected on the basis of its scope to be developed, whilst minimising harm to the overall function of the Green Belt, and its suitability for development in other respects. The criteria used have included physical suitability for development, accessibility by sustainable transport modes to services and facilities, levels of existing or potential future infrastructure provision, economic viability for development, and the impact that development would have on the environment.

The exceptional circumstances to release Sites 1EA and 1ES are set out generally by Policy LPA02, paragraphs 4.6.4 to 4.6.11, and paragraphs 4.12.13 of the Plan. The GBR concludes that Site 1EA should be removed from the Green Belt and allocated. It also provides the assessment to show why these sites are selected having regard to their role and function in relation to the purposes of the Green Belt on a comparative basis with other potential sites. The exceptional circumstances have therefore been adequately set out.

*4. Are the configuration and scale of the allocation and safeguarded land justified taking into account development needs and the Green Belt assessments?*

The scale and configurations of the allocations is justified by the evidence of the need for employment land<sup>6</sup>, the need to respond to the opportunities for inward investment, most particularly by the logistics sector having regard to NPPF paragraphs 80-82 and PPG guidance on meeting economic need<sup>7</sup>. To be fit for purpose, the allocations and safeguarded land must be of a scale to accommodate development for the logistics sector. This is also relevant to the configuration of the allocations. The Green Belt Assessment has taken account of development potential<sup>8</sup>. The configuration and scale of the allocations and safeguarded land is justified taking into account development needs and the Green Belt assessments.

*5. Would the adverse impacts of developing Site 1EA (Green Belt impacts, traffic, air quality) outweigh the benefits?*

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<sup>6</sup> See the Employment Background Paper (SD022) and the Council's response to Matter 2: Employment Needs and Requirements

<sup>7</sup> Specifically, para. 031 Reference ID: 2a-031-20190722

<sup>8</sup> Stage 2B of the Assessment.



The benefits of developing Site 1EA are substantial, particularly in meeting a need in Warrington and by unlocking job and training opportunities at the wider Omega employment area through the improvement of accessibility (consistent with the requirements of Policy LPA04.1 and the site requirements in Appendix 4). The site provides the only opportunity to expand Omega South, which is a highly successful location for economic development. The “call-in” application has provided evidence to satisfy SHBC and WBC that the impact of development on traffic, air quality and biodiversity do not outweigh the benefits.

*6. Is Site 1EA deliverable, taking into account any offsite transport infrastructure required?*

The “call-in” application demonstrates that there are no barriers to Site 1EA coming forward, bearing in mind that the application was for a larger development and necessary transport infrastructure is in place to support that scheme. The evidence to the “call-in” inquiry demonstrated that no additional off site transport infrastructure was required beyond the works being undertaken<sup>9</sup>.

*7. Should Site 1ES be allocated rather than safeguarded so that it can contribute to meeting needs in the Plan period?*

The reasons for this site to be considered as safeguarded are set out within the Green Belt Review 2018 (SD020).

The Plan requires a minimum of 219.2ha of land for employment development between 2018 and 2035 (see policy LPA04 as amended by proposed modifications AM015 and AM020 in SD003). The Council has identified sufficient land to deliver 234.08ha of employment land to 2035 (when discounting site 1EA which is to meet the needs of Warrington Borough Council). Site 1ES is not required to meet the residual employment land requirement of 219.2ha to 2035, nor has it been identified to meet needs arising in Warrington. The need for employment land in St Helens can be met over the plan period to 2035 through the existing proposed allocations.

Even if the Plan period is extended to 2037, there are still sufficient allocations provided for in the Plan to meet identified needs, without needing to allocate site 1ES also (as set out in SHBC001 and updated in the response to question 4 in the Council’s Matter 2 hearing statement (M2.01)).

The site is therefore proposed to be safeguarded land to meet longer term development needs “well beyond” 2035, and there is no justification to change it to a site allocation.

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<sup>9</sup> The evidence on deliverability is set out in the proof of David Milloy of Miller Developments to the “call-in” inquiry (Omega Inquiry Doc ref. CD 38.8: <https://www.omegawestdocuments.com/> )

*8. Are the indicative site areas and appropriate uses for Sites 1EA and 1ES within Tables 4.1 and 4.7 justified and effective?*

The indicative areas and appropriate uses for Site 1EA flow from the information provided by Homes England in response to the “call for sites”. The “call-in” application has overtaken matters because the proposal is for a significantly larger development, on a larger site, and to meet the specific requirements of TJ Morris (Home Bargains). However, in the event that the “call-in” application is refused permission, and in the absence of agreement with Warrington that the additional land over and above Site 1EA is required to meet needs arising in Warrington, it is appropriate for the Plan to allocate Site 1EA as proposed. The indicative site areas and appropriate uses are justified and effective because they reflect the submission by Homes England, the agreed contribution to meeting the employment requirement arising in Warrington and for delivery and extension to Omega South with a compatible land use. Similar considerations apply to Site 1ES (with the exception that this site is proposed to meet the longer term needs of St Helens Borough, not Warrington).

*9. Are the requirements for Site 1EA within Policy LPA04.1 (Sections 2, 3, 4 and 5) and Appendix 5 (Site Profile) and for Site 1ES within Appendix 7 (Site Profile) positively prepared and effective?*

The requirements for Sites 1EA and 1ES are positively prepared because they highlight matters that will necessarily be considerations in the determination of a planning application in order to generally: secure a satisfactory form of development (LPA04.1, section 2); ensure that development has a positive impact on the regeneration of the Borough through the targeting of job creation and training for local people; and to ensure the development is accessible in the interests of providing a choice of transport options, helping people living in areas of multiple deprivation access job opportunities. The evidence to the “call-in” inquiry emphasised the benefits to St Helens Borough of the creation of public transport links and skills and training opportunities to residents of the Borough in areas of multiple deprivation. The development of Site 1EA, with the provision of public transport in particular, offers a benefit of making Omega as a whole accessible to St Helens residents.

The requirements are effective as they set conditions to guide development in order to meet identified needs; ensure a comprehensive and coordinated development; and a quality scheme that addresses site specific matters in a development proposal. They also ensure that development will optimise the contribution of these sites to regeneration.

*10. Are there any barriers to Site 1EA coming forward in the Plan period?*

The “call-in” application demonstrates that there are no barriers to Site 1EA coming forward. In the event that the “call-in” application is not approved, the works already undertaken to ensure an “oven ready”<sup>10</sup> scheme would facilitate the development of Site 1EA.

**Issue 2: Bold Forest Garden Suburb (4HA), Land South of Gartons Lane (5HA) and Former Penlake Industrial Estate (3HA)**

*11. Does the Plan reflect the current status of Penlake Industrial Estate (3HA) as a commitment?*

In response to the Inspectors’ initial questions and comments on allocations and safeguarded land, Matter 4 specifically, the Council indicated that the allocation of site 3HA can be removed (as a main modification), thereby removing reference of it from policy LPA05 table 4.5 and the Appendix 5 site profiles to reflect the site’s committed status (SHBC005).

As provided in SHBC007, Appendix 1, the updated housing supply trajectory 2021-2037 indicates that site 3HA has 131 units currently outstanding. It is anticipated that the outstanding units will be completed and delivered within 5 years of adoption of the plan.

*12. Do the Green Belt assessments support the allocations 4HA and 5HA and demonstrate exceptional circumstances for the removal of the land from the Green Belt?*

Yes, the assessments of sites 4HA and 5HA within the GBR 2018 (SD020) support their allocation within the Plan.

Regarding site 4HA, the assessment of the parcel (GBP\_074) (and sub-parcels within it) against the Green Belt purposes at stage 1B found that the sub-parcels made only a weak to moderate contributions to the purposes of the Green Belt.

The Green Belt Review found that this parcel of Green Belt forms a notable indent in the southern edge of the built up area of St Helens, and whilst there are open views across the parcel, it is bounded by strong, robust physical boundaries, including development to the north, east and west, and a road to the south. The assessment also found there to be good

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<sup>10</sup> A term adopted at the “call-in” inquiry and arising from David Milloy’s evidence, meaning that all necessary infrastructure is already in place, such as enery and highway infrastructure.

accessibility to jobs in nearby industrial areas and to public transport links (including St Helens Junction train station).

Further, the parcel is considered able to form a 'garden suburb' extension to the south of Bold of a sufficiently large scale to include new social infrastructure (primary school, local retail centre, health facilities), and provides a strategic opportunity to deliver a wide range of housing close to some of the more deprived parts of the Borough. Perhaps most significantly, the parcel is located within the area addressed by the Bold Forest Park Area Action Plan (LOC004), and so there is the opportunity for the development of this parcel to incorporate the philosophies of the AAP into the design and help to realise and deliver some of the aspirations set out within it.

The Green Belt Review also considered constraints in relation to delivering the site, and found there to be no constraints (including land ownership) that would prevent development of the site.

The assessment concluded that the parcel has many positive attributes, which support its allocation for development, and that due to its size and scale, development of this parcel would contribute strongly to meeting the strategic aims and objectives of the Local Plan. Likewise, for the reasons referenced above, it has the potential to help deliver on the aims of the Bold Forest Area Action Plan.

Regarding site 5HA, the assessment of the parcel (GBP\_080) against the Green Belt purposes at stage 1B found that the parcel makes a weak contribution to the purposes of the Green Belt.

Furthermore, the assessment found the parcel has a high degree of visual enclosure, with strong robust boundaries. It is in a sustainable location with good transport links including accessibility by walking to the nearest local centre, bus stops and a railway station.

Development of the parcel could reasonably be expected to provide funding to facilitate improvements to Sutton Manor Nature Reserve to the south and visitor attraction, including improvements to the utilities for the proposed visitor centre and a car park located on the boundary of the parcel. Furthermore, new residents would have access to high quality open spaces / natural greenspace, public transport, education and health facilities, and employment opportunities.

The assessment concluded that the parcel has many positive attributes, supporting its allocation for development. As with site 5HA, the site has the potential to help deliver on the aims of the Bold Forest Area Action Plan.

For the reasons above, it is considered that the assessment of the sites through the Green Belt Review supports their allocation in the Local Plan, and that exceptional circumstances are demonstrated to justify their removal from the Green Belt.

*13. If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?*

Appendix 5 provides the site requirements for the proposed site allocations. The requirements for both sites 4HA and 5HA specifically reflect their importance to delivering improvements in line with the Bold Forest Park Area Action Plan, which is a key part in the exceptional circumstances to justify their release from the Green Belt. Therefore, it is considered that the exceptional circumstances are articulated and reflected through the site requirements. However, it is acknowledged that this could be done more clearly in the main document, perhaps by providing an explanation of the exceptional circumstances for these sites (as set out above) in the reasoned justification to Policy LPA05 (as a main modification).

*14. Are the configuration and scale of the allocations justified taking into account development needs, the Green Belt assessments and land ownerships?*

The Council considers that the configuration and scale of sites 4HA and 5HA are justified as they will assist in meeting the identified housing needs of the Borough.

The scale of both sites has been informed by a range of documents, most notably the GBR, as well as responses from call for sites (CFS) exercises that have taken place. During the Green Belt Review process, an in-depth understanding of potential site constraints was utilised, and the notional development capacity of sites was reduced where necessary to take account of constraints.

Further to this, at the Local Plan Preferred Options consultation stage, representations were received from site promoters referring to their own site capacity figures, which acted as a sense check as they broadly supported the Council's assumptions (see Appendix G, SD020 for further detail).

When considering the GBR alongside other documents including the Infrastructure Delivery Plan (SD013) and the Bold Forest Garden Suburb Position Statements (SD027) (with specific reference to site 4HA), the Council is confident that the scale of these sites and their potential deliverability outcomes are reasonable and justified.

In terms of site 4HA, the scale of development is also justified as it provides a critical mass to provide new social infrastructure on site. Further, the scale of the site will provide opportunities through the masterplanning process to design different character areas, with varying styles and development densities responding to the opportunities and constraints that exist. It is therefore reasonable that approximately 3,000 dwellings could be delivered on this site overall.

Land ownership details for sites 4HA and 5HA are known, and the associated site areas are actively promoted. As CFS exercises were conducted, the Council has been able to engage with landowners. Through engagement, the Council is confident that the scale of sites is reasonable and deliverable, and therefore the allocation of these sites is justified.

With reference to site 3HA, please see the Council’s response to question 11 above. As site 3HA is currently under construction, it is considered that this development will contribute positively towards the development needs of St Helens Borough during the duration of the plan period (2021-2037).

*15. Is the allocation of Site 4HA broadly consistent with the Bold Forest Park Area Action Plan?*

Yes, the Council considers that the allocation of site 4HA is consistent with the Bold Forest Park Area Action Plan (BFPAAP) (LOC004).

The BFPAAP (LOC004), in Policy BFP1, acknowledges that the Park is to meet the needs of the community, by, amongst other matters, “ensuring the Bold Forest Park area contributes to meeting the Borough’s needs for housing, employment, open space, sport and recreation.” Further, Policy BFP SN2 requires development to contribute to the infrastructure of the Forest Park, ie. provision of / improvements to footpaths, bridleways, cycleways, car parks, landscape conservation and biodiversity etc. Therefore, there is clear acknowledgement within the AAP of the potential need for development within the Park, and an understanding of the benefits this may bring to implement improvements. The allocation of site 4HA directly reflects this.

In addition, the Sustainability Appraisal recognises that the Plan’s spatial strategy and the sites identified within it (including 4HA), would help deliver significant long-term positive effects for the Bold Forest Park area such as the continuation of landscape reclamation and environmental improvements (paragraph 7.8.3, SD005).

Policies within the BFPAAP will work in conjunction with policies within the Local Plan to ensure that the development of site 4HA is suitable and consistent with the BFP vision of supporting a thriving diverse economy, providing a recreational resource, enhancing the natural and cultural environment and improving accessibility of the Bold Forest Park area to and from the wider area.

Policy LPA05.1 requires the strategic housing allocations to develop a comprehensive masterplan. Section 2 of this policy provides an overview of the requirements to be addressed during the master-planning process. Outlined below is a high level indication of how the master-planning requirement (in relation to site 4HA) will ensure consistency with the BFPAAP is achieved.

LPA05.1 Policy Criteria	Consistent with BFPAAP policy:
2a) amount of development and proposed uses	<ul style="list-style-type: none"> <li>• Policy BFP1: A Sustainable Forest Park</li> <li>• Policy BFP SN1: Meeting the Development Needs of the Borough in a Manner Appropriate to the Forest Park</li> </ul>

2c) indicative layout and design details for the whole site that must provide for an attractive built form with high quality landscaping when viewed from within the development and elsewhere	<ul style="list-style-type: none"> <li>• Policy BFP1: A Sustainable Forest Park</li> <li>• Policy BFP SN1: Meeting the Development Needs of the Borough in a Manner Appropriate to the Forest Park</li> <li>• Policy BFP INF6: Creating an Accessible Forest Park</li> <li>• Policy BFP ENV1: Enhancing Landscape Character</li> </ul>
2d) measures to provide good levels of accessibility to the whole site from the surrounding area by public transport, walking and cycling	<ul style="list-style-type: none"> <li>• Policy BFP INF6: Creating an Accessible Forest Park</li> </ul>
2e) indicative layout promoting permeability and accessibility by public transport, cycling and walking	<ul style="list-style-type: none"> <li>• Policy BFP INF6: Creating an Accessible Forest Park</li> </ul>
2f) a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage in a holistic and integrated way	<ul style="list-style-type: none"> <li>• Policy BFP1: A Sustainable Forest Park</li> <li>• Policy BFP SN1: Meeting the Development Needs of the Borough in a Manner Appropriate to the Forest Park</li> <li>• Policy BFP INF6: Creating an Accessible Forest Park</li> <li>• Policy BFP ENV1: Enhancing Landscape Character</li> </ul>

In addition, appendix 5 of the SHBLP also reinforces the need for site 4HA to be consistent with the vision, aim and objectives of the BFPAAP. Site 4HA profile lists requirements such as:

- “development must provide a well landscaped setting including extensive green routes... and promote the objectives of the BFPAAP to increase tree cover by 30% across the Bold Forest as a whole” and,
- “development must also provide a choice of foot, bridleway and cycle routes through the site .... in line with Policy INF6 “Creating an Accessible Forest Park” of the Bold Forest Park Area Action Plan 2017”.

These requirements are an example of Policy BFP1: A Sustainable Forest Park, Policy BFP SN1: Meeting the Development Needs of the Borough in a Manner Appropriate to the Forest Park, Policy BFP INF6: Creating an Accessible Forest Park and Policy BFP ENV1: Enhancing Landscape Character being supported by the Local Plan and demonstrating consistency between the development of site 4HA and the BFPAAP.

Lastly, the allocation of site 4HA will facilitate the delivery and development of recreational activities in the nearby area, specifically at Clock Face Country Park and Colliers Moss Common which lie adjacent to site 4HA. It is anticipated that off-site developer contributions associated with the development of site 4HA would likely facilitate improvements at the above locations. Thus, this would accord with policies BFP INF3: Clock Face Country Park

Recreation Hub/Cycling Centre and Policy BFP INF4: Colliers Moss Common Recreation Hub Development Opportunity Site.

SHBC005, questions 23 to 26 provide further detail on how the development of site 4HA will be compatible with the Bold Forest Park Area Action Plan.

*16. Would the adverse impacts of developing Sites 4HA and 5HA (including Green Belt impacts, traffic, air quality, flood risk, loss of agricultural land, biodiversity) outweigh the benefits?*

No, it is not considered that the adverse impacts would outweigh the benefits of these two sites. As referenced above, the Green Belt Review assessed the parcel of land comprising site 4HA as making a weak to moderate contribution to the purposes of the Green Belt. Similarly, the parcel of land comprising site 5HA was assessed as only making a weak contribution to the purposes of the Green Belt.

In accordance with Appendix H of the Green Belt Review (SD020), the “vast majority of Green Belt land within the Borough is identified as “best and most versatile”, consequently, if the Council took the decision to discount all the land within the “best and most versatile”, it would not be able to meet its housing and employment needs for the proposed plan period and beyond.” Therefore, harm is balanced against the contribution the parcels make in meeting the identified housing needs of the Borough, and is not considered to outweigh the benefits.

In terms of traffic and air quality, the GBR found that both of these sites have good access to public transport, and that any highway impacts could be mitigated. The site profile requirements also require foot and cycle links, encouraging sustainable and active transport modes. In terms of biodiversity, any potential harm can be mitigated.

Therefore, the benefits of allocating and developing these sites, including their ability to deliver improvements in accordance with the Bold Forest Park AAP, would outweigh any adverse impacts.

*17. Are the requirements for Sites 4HA and 5HA within Policy LPA05.1 (Section 2) and Appendix 5 (Site Profiles) positively prepared and effective, particularly in relation to ensuring Green Infrastructure and sustainable modes of travel are delivered alongside the development?*

The Council considers that the requirements listed within Policy LPA05.1, section 2 and Appendix 5 site profiles, with the inclusion of the main modifications (as currently suggested in SHBC010) are positively prepared and effective.

The requirements set out within policy LPA05.1 criterion 2 will enable comprehensive masterplans for all strategic sites to be developed. Detailed planning matters can be considered and addressed during this process, including green infrastructure plans as required under criterion 2d), and accessibility by sustainable transport modes as required in



accordance with criteria e) and f), therefore facilitating the delivery of high-quality residential developments on these sites. Proposed main modification to criterion 2f) in the draft main modifications schedule (MM038, SHBC010) has been suggested for improved effectiveness of this policy, particularly in relation to site 4HA. It will assist in expanding the greenway network, and in doing so, will bring benefits in terms of the green infrastructure network and provide improved opportunities to utilise sustainable travel modes. It is positively prepared and effective.

The Appendix 5 site profile requirements have been informed by the evidence base, including the GBR and Infrastructure Delivery Plan (SD013). In addition, discussions with colleagues in various Council departments such as highways and environmental health as well as external partners have informed the creation of reasonable, site-specific requirements that will assist in site delivery.

In addition, as set out in response to question 15 above, the requirements listed within the Appendix 5 site profiles not only accord with policies contained within the existing BFPAAP (LOC004), but also seek to deliver on the vision and objectives of the AAP. This is applicable to both sites 4HA and 5HA, addressing both green Infrastructure and accessibility, including by sustainable modes of transport.

Criteria in section 2 of Policy LPA05.1 along with the requirements set out in the site profiles for 4HA and 5HA in Appendix 5 will thus assist in the delivery of high quality development, and therefore are positively prepared and effective.

*18. Are the net developable areas, minimum densities and indicative site capacities within Table 4.5 justified and effective?*

The Council considers that the net developable areas, minimum densities and indicative site capacity for sites 4HA and 5HA included within table 4.5 are justified and effective.

The Council has applied a net developable area (NDA) of 75% for both sites. Indeed, the Council has applied a standardised approach by applying a specific NDA dependent on the site size (area in hectares) to all proposed allocation included within the SHBLP.

This is consistent with the NDA applied in both the Strategic Housing Land Availability Assessment (SHLAA), (HOU002) and the St Helens Economic Viability Assessment (VIA001). As a result, the Council consider that the NDA are justified and effective.

Gross Site Size	Net Developable Area
Less than 0.4 ha	100% of gross area
0.4 ha to 2 ha	90% of gross area
Sites over 2 ha	75% of gross area

**Above:** Extract taken from HOU002: St Helens Strategic Housing Land Availability Assessment Update July 2017 of Figure 3.8: Gross / net developable area assumptions (p.16)

The evidence base, including the SHLAA 2017 (HOU002), has informed the minimum densities for the proposed site allocations in Table 4.5. The rationale for these is set out in the SHLAA, paragraph 3.47. However, it states in paragraph 4.18.14 of the LPSD that “the actual capacity will also be determined having regard to the acceptability of specific proposal in relation to relevant national and local policies” and therefore there is an acknowledgement that densities may vary but are not expected to fall below a minimum of 30dph, unless there is a legitimate planning reason to do so.

With regard to site 4HA, the Council acknowledges that densities may vary across the site, reflecting the overall significant site scale, and the ability for different character areas to be delivered within it, ie. there could be higher densities achieved closer to services and facilities on site, with areas of lower density in other parts with greater amount of landscaping. This also reflects the Plan’s intention that the site complies with the vision, aims and objectives of the BFPAAP (LOC004). However, it is anticipated that an average minimum density of 30dph will be achievable.

With regard to site 5HA, this site could facilitate a higher density of 35 units per hectare due to its positioning close to the existing urban area and access to sustainable modes of public transport.

In reference to site capacities, the Council’s response to PQ44 (SHBC001) outlines that site capacities will be determined on a case-by-case basis to ensure that the appropriate densities are secured taking into account the local character.

Notwithstanding this, the indicative site capacities listed have been calculated based upon the stated net developable areas and minimum densities, taking account of factors such as potential sites constraints, landscaping, and infrastructure have been taken into account in the capacity calculation. Therefore, they are considered robust, justified and effective.

*19. Should the Bold Forest Garden Suburb (4HA) have a bespoke policy in view of its scale?*

There is merit in having a bespoke policy in the Plan for the allocation of the Bold Forest Garden Suburb on the basis of its scale. Such a policy would be able to specifically address the needs of a site at this scale, taking account of the Bold Forest Garden Suburb Position Statement (SD027) and the Bold Forest Garden Suburb Transport Review, August 2019 (TRA005). It would ensure the delivery of a comprehensive, well planned development in this location. This would need to be addressed via a main modification to the Plan.

*20. Will infrastructure to support the allocations be delivered at the right time and in the right place?*

An initial review of the infrastructure requirements for sites 4HA and 5HA has been undertaken during the production of the Plan and will be developed further during the

masterplanning stages, particularly with reference to site 4HA. The Infrastructure Delivery Plan (IDP) (SD013) outlines specific physical, social and environmental infrastructure requirements that will be necessary to support the delivery of the Plan. Throughout the production of the IDP, liaison with partners including (but not exhaustive) local education authority departments, health and social care departments such as the CCG, local highways authority and utility providers enabled the Council to gain an understanding of specific infrastructure requirements on a site-specific and Borough-wide level. Discussions with partners will continue throughout the Plan period to keep the IDP up to date to ensure infrastructure requirements are continually assessed and monitored.

In specific reference to site 4HA, a position statement has been produced (SD027) which outlines the latest information regarding infrastructure needs for the site in respect of transport, education, health and retail.

The Economic Viability Assessment (VIA001, Table 6.19) tested the proposed allocations for viability and found that both sites were economically viable. Therefore, evidence supports the ability of these sites to deliver the necessary infrastructure. In accordance with the evidence, the Council considers this can be delivered at the right time and in the right place. This will be supported through the discussions as part of the development management process when the planning applications are submitted.

*21. Are there any barriers to Sites 4HA and 5HA coming forward as anticipated by the housing trajectory, for example land assembly/multiple ownerships?*

As stated in paragraph 4.16 of the Housing Background Paper (SD025), Green Belt site allocations have a lead in time of 2.5 years from adoption of the Plan as the site promoters rely on the certainty of a Local Plan allocation before submitting planning applications. Additionally, this lead-in time will enable the preparation of a comprehensive and detailed masterplan for all allocated sites. This background paper further states in paragraph 4.22 that site 4HA has a greater lead-in time of in 7 years to enable the creation of a site-specific SPD.

As stated previously above (question 14 response), the Council is aware of the landownerships details for both sites, and as they are both being actively promoted for development, the Council does not foresee any barriers to them coming forward as anticipated in the housing trajectory (SHBC007).

In relation to site 4HA, the Council acknowledges that there are multiple landownerships, and whilst the landholdings are being actively promoted, the Green Belt Review did recommend an allowance for slower implementation should be made on account of this. Therefore, the site is anticipated to deliver 60 dwellings per annum, which is reasonable on the basis of a site of this size being able to support more than developer/one sales outlet. There is therefore no basis on which to consider site 4HA could not deliver as anticipated in the trajectory.

With respect to site 5HA, Appendix 6 of the Housing Need and Supply Background Paper (SD025) provides evidence of build out rates on sites of over 200 dwellings averaging 45

dwellings per annum, which aligns with the expectations of delivering this site in the trajectory (SHBC007, Appendix 1).

On the basis of the lead in times and delivery rates as explained above which have taken account of the circumstances of both sites (including land ownership details), there are no barriers to the sites coming forward as anticipated.

### **Issue 3: Eccleston (3HS), Sutton Manor (6HS), and Thatto Heath (10EA, 9HA, 7HS)**

#### *22. Does the Plan reflect the current status of Former Linkway Distribution Park (9HA) (with planning permission) and Lea Green Farm (10EA) (completed)?*

Site 9HA obtained outline planning permission in 2018, with a recent reserved matters application (P/2021/0405/RES) being submitted to the Council. This is currently under consideration and awaiting determination. To reflect the current status of site 9HA, the Council has suggested a main modification to revise the Appendix 5 site profile (SHBC010, Annex 1). This proposes to add new site requirements that reflect key conditions extracted from the decision notice of the planning application P/2018/0060/FUL.

With reference to site 10EA, the Council has indicated in SHBC005 (Matter 4 section), that the allocation of site 10EA can be removed (as a main modification) from policy LPA04 table 4.1 and appendix 5 site profiles to reflect the site's completed status.

The Council considers that with these proposed modifications, the current status of these sites will be accurately reflected in the Plan.

#### *23. What is the up-to-date position on the application for development at Eccleston Golf Course?*

A hybrid application for development of this site was submitted in October 2020, comprising an outline application for up to 646 dwellings (with convenience retail and nursery use floorspace), and full application for 168 dwellings (Parcel 1) and 186 dwellings (Parcel 3).

The applicants are currently preparing further information to submit in support of the application, which will be consulted on and considered in due course.

*24. Do the Green Belt assessments support the safeguarded land (3HS, 6HS, 7HS) and demonstrate exceptional circumstances for the removal of the land from the Green Belt?*

Yes, the Council considers the assessments of sites 3HS, 6HS and 7HS within the Green Belt Review 2018 (SD020) justify their safeguarded land status, and demonstrate exceptional circumstances for their removal from the Green Belt.

Regarding site 3HS, the stage 1B assessment of the parcel found that it makes only a limited contribution to the purposes of the Green Belt. It considered that whilst the parcel is of a substantial size and has open views across it, it is reasonably well contained by existing housing to the south, west and north east and by a railway line to the north. It is not considered to form a strategic gap in Green Belt terms. It has good accessibility to a range of services, jobs and public transport, with scope to improve facilities at the adjacent railway station through provision of car parking within the parcel.

However, there are identified constraints on site that are considered to affect the developability of the parcel within the plan period, including the use of the land as a golf course, and therefore there is conflict with national planning policy protecting sporting facilities from loss. There are also some highway constraints in the surrounding area involving key junctions that already experience capacity issues. Such issues are likely to substantially limit the residential capacity of the site.

Furthermore, there are a number of physical constraints within the parcel itself (electricity pylons and railway line would need appropriate buffer zones, as well as utilities infrastructure). Such physical constraints could fragment the developable area and limit the net developable area (NDA).

Notwithstanding the identified constraints, further evidence and work could address such issues in the longer term. On the basis of the good site accessibility, the limited contribution the site makes to the Green Belt purposes and the scope for it to improve the facilities at the adjacent railway station, the safeguarded land status of the site is justified and exceptional circumstances are demonstrated to remove the this parcel from the Green Belt.

Regarding site 6HS, this comprises sub-parcel GBP\_082\_A, part of parcel GBP\_082. The GBR found the sub-parcel makes a weak contribution to the purposes of the Green Belt and has a reasonable degree of self-containment, due to the presence of woodland on the countryside boundaries.

However, the parcel projects notably outwards into the countryside from the urban edge, and is further from the nearest local centre than some other parcels Whilst there are some other constraints (presence of a Local Wildlife Site and protected woodland, both of which would require buffers), which will need to be looked at in further detail, they do not render the site undevelopable. The assessment concludes the parcel has positive attributes supporting its release from the Green Belt to help meet longer term needs beyond the Plan period, thus supporting its proposed safeguarded land status in the plan and demonstrating exceptional circumstances.

Regarding site 7HS, this forms part of sub-parcel GBP\_085\_C. The GBR assessment concludes that this sub-parcel makes only a weak contribution to the Green Belt purposes. It found that the site is self-contained visually (by existing development to the north, school to the northeast, woodland and residential development at the new Waterside Village to the southeast and higher ground to the west), has strong boundaries and does not significantly contribute to the wider strategic gap. The sub-parcel is sustainably located, because it is within walking distance of a local convenience shop, readily accessible by public transport users and local highway network.

Whilst the GBR references some constraints in relation to this site, none of these are considered sufficient to preclude development. However, as the surrounding area includes substantial opportunities for redevelopment of previously developed sites, including some within a short distance, the GBR concluded it would be appropriate to delay development of this sub-parcel until after the end of the Plan period to ensure appropriate phasing of development.

For the reasons set out, it is therefore considered that the Green Belt assessments for these three sites support their status as safeguarded land in the Plan and demonstrate exceptional circumstances for their release from the Green Belt to meet longer term housing needs.

*25. If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?*

Whilst the GBR provides the exceptional circumstances to release these sites from the Green Belt and justify their safeguarded land status in the Plan, it is acknowledged that the detailed reasoning, as set out above, is not clearly articulated in the Plan on a site by site basis. This could be undertaken in the reasoned justification to Policy LPA05, as a main modification.

*26. Is the configuration and scale of the safeguarded land justified taking into account long-term development needs and the Green Belt assessments?*

The scale and configuration of sites has evolved throughout the plan making process (including for these sites, particularly 7HS and 6HS), with the final conclusions being informed by the evidence, primarily the GBR, which provided an in-depth understanding of any potential site constraints (as well as the Infrastructure Delivery Plan (SD013))

The detailed assessment of sub-parcel GBP\_082a (part of which is site 6HS) in the GBR found there to be protected woodland and a Local Wildlife Site (LWS) (Pendlebury Brook) present, which needs a significant buffer. Accordingly, it recommended an appropriate reduction in the Net Developable Area (NDA). The boundary of the proposed allocation (6HS) in the LPSD was adjusted to take account of this (compared to the original site boundary in the Local Plan Preferred Options (LPPO)). The scale and configuration of safeguarded site 6HS is therefore now considered justified, based on the on-site constraints.

Site 7HS has been reduced in scale for inclusion in the LPSD since the LPPO proposed it as a safeguarded site. This reflects concerns around the harm to the character and appearance of the area caused by the site at the scale identified in the LPPO, as identified in the Green Belt Review. Therefore, the scale and configuration of the site is justified and based on the latest evidence. It should also be noted that the decision to reduce the scale of this safeguarded land is further justified by the reduction in identified housing need in the LPSD (compared to the LPPO stage).

The proposed safeguarding of site 3HS was also informed by the GBR, which identified constraints relating to the parcel, which in turn, informed the proposed scale and configuration of the site. It is also worth noting that the planning application for this site referred to in response to question 23 is for up to 1,000 dwellings, which aligns with the scale of the site proposed for safeguarding in the Plan (956 dwellings, Table 4.8, LPSD).

The scale of these sites contributes to the approximate 5-6 years of housing land the Plan proposes to safeguard for needs beyond the Plan period. In conclusion, their scale and configuration as proposed in the Plan is based on the evidence available and assists in meeting longer term needs, and are therefore considered robust and justified.

*27. Should any of the safeguarded sites be allocated rather than safeguarded so that they can contribute to meeting needs in the Plan period?*

The Council does not consider there is any justification to allocate any of the sites currently proposed to be safeguarded. There is a robust housing supply over the plan period to meet identified needs, even if the Plan period is extended to 2037.

Furthermore, the Council is seeking to maximise housing delivery on previously developed land within existing urban areas, in accordance with section 3 of Policy LPA02. To change the status of these sites from safeguarded land to site allocations, when there is a robust supply of sites to meet identified needs over the Plan period, would risk undermining this approach, as it would lessen the Council's ability to phase development of previously developed land ahead of Green Belt. This in turn would not align with the Plan's strategic aim of "supporting regeneration and balanced growth".

*28. Are the requirements for the sites within Appendix 7 (Site Profiles) necessary, positively prepared and effective?*

The inclusion of site profiles illustrates that the safeguarded sites are developable in the long-term thus, justifying their removal from Green Belt. In addition, the site profiles provide both developers and local residents with some reassurance and certainty on what the future development requirements may be (paragraph 62, Matter 4 section, SHBC001). On this basis, they are considered necessary and effective in terms of the Council's ability to meet longer term needs beyond the Plan period, and in turn, means they are positively prepared.

Requirements in the Appendix 7 profiles have been informed by the evidence base (including the GBR 2018 and the Infrastructure Delivery Plan). Indeed, outcomes from Green

Belt Review stage 3 assessments for these sites are reflected in the requirements within their Appendix 7 site profiles. As a number of the requirements are site-specific and based on the evidence, they are necessary and effective. In demonstrating what may be required to successfully develop these sites in the longer term, should they be allocated in a future Plan review, they are positively prepared.

*29. Are the net developable areas, minimum densities and indicative site capacities within Table 4.8 justified and effective?*

The Council considers that the net developable areas, minimum densities and indicative site capacities for these sites within table 4.8 are justified and effective.

The Council has applied an indicative Net Developable Area (NDA) of 75% for site 6HS and 7HS, consistent with the approach taken with the proposed allocated sites within the Plan (Table 4.5), as well as other housing supply sites (i.e. SHLAA sites). The Council considers that the application of this standardised indicative NDA is therefore justified and effective, as there is no evidence to justify a need to do otherwise in relation to these two sites. However, a lower indicative NDA of 65% has been applied for site 3HS due to known physical constraints on-site, as set out within the GBR.

The evidence base, including the SHLAA 2017 (HOU002) has informed the minimum densities included within table 4.8. The rationale for these densities is outlined in the SHLAA, paragraph 3.47, and has provided the basis for the densities also applied to the proposed LPSD housing site allocations. However, it is acknowledged that the actual capacities will be determined having regard to the acceptability of specific proposals, including the need to respect local character. Therefore, whilst densities may vary, they are not expected to fall below a minimum of 30dph in relation to these sites due to the locational properties, access to amenities such as public transport services and known site constraints.

The indicative site capacities have been calculated based upon the stated Net Developable Areas and minimum densities and so constraints have been taken account of. Whilst there is an acceptance that the capacity of each safeguarded site is to be assessed further prior to any future decision to allocate it in a future Local Plan (footnote 37, page 51, LPSD, SD001), they are considered to be effective and justified given their proposed 'safeguarded' status in the Plan.



**Issue 4: Gerards Park, College Street (11EA), Land East of City Road, Cowley Hill (6HA), Moss Nook urban Village (10HA) and land south of A580, Windle (8HS)**

*30. What is the up-to-date position on the allocations 11EA, 6HA and 10HA?*

Site 11EA is currently under construction. The latest employment monitoring information indicated the steel frames of the buildings are in place, as per a site visit undertaken at the end of March 2021.

Site 6HA (application reference P/2020/0846/FUL) was considered by the Council's Planning Committee on Tuesday 16 March, where it was resolved to grant outline permission for up to 1,100 dwellings and up to 3,925sqm of mixed use floor space (within use classes A1, A2, A3, A4, B1, C1, D1 and D2). The decision notice will be issued following completion of a s106 agreement.

Site 10HA is currently subject to a reserved matters application for 258 dwellings as part of an initial phase of development. A £2 million grant has been secured to accelerate development of the site, and it will help unlock this initial phase through a financial contribution to the construction of a spine road (works have commenced on site) and associated infrastructure.

*31. Should the status of any of 11EA, 6HA and 10HA be changed from allocations to commitments?*

Whilst sites 6HA and 10HA are at advanced stages in the planning application process, the decision notice is awaited for 6HA and 10HA is not yet subject to final reserved matters approval. It is therefore considered appropriate to retain these sites as allocations in the Plan.

However, given the status of site 11EA as currently under construction, the Council considers that the site status could change from allocation to commitment.

*32. Does the Green Belt assessment support the safeguarded land (8HS) and demonstrate exceptional circumstances for the removal of the land from the Green Belt?*

Yes, the assessment of site 8HS in the Green Belt Review supports its designation of safeguarded land in the Plan to assist in meeting future needs beyond the end of the Plan period. The GBR identified this land as parcel GBP\_098, and in the stage 1B assessment found that this parcel makes only a limited contribution to the purposes of Green Belt.

However, the GBR also identified a number of constraints affecting the site which, whilst considered able to be mitigated over the longer term, are likely to have an impact on the phasing of development. It also considered its development would constitute a sizeable outward extension of the urban area into the countryside, beyond a currently well defined edge. Whilst this is not considered to detract from the exceptional circumstances justifying the removal of this land from the Green Belt through safeguarding, it does require careful consideration of its timing for development in light of the Council's objective of making efficient use of Previously Developed Land to meet needs.

It is therefore considered that the safeguarding of this site is supported by the Green Belt assessment, and that exceptional circumstances are demonstrated, particularly in view of meeting identified longer term needs, and that the longer term development of this site would deliver infrastructure improvements in terms of highways and social infrastructure.

*33. If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?*

Whilst the GBR provides the exceptional circumstances to release this site from the Green Belt and justify its safeguarded land status in the Plan, it is acknowledged that the detailed reasoning, as set out above, is not clearly articulated in the Plan on a site specific basis. This could be undertaken in the reasoned justification to Policy LPA05, as a main modification.

*34. Is the configuration and scale of the safeguarded land justified taking into account long-term development needs and the Green Belt assessments?*

The configuration and scale of safeguarded site 8HS is justified as this site will assist with meeting the long-term developments needs of St Helens Borough, and its safeguarded status is informed by the Green Belt Review 2018.

The Green Belt Review process provided an in-depth understanding of potential site constraints, as well as the Infrastructure Delivery Plan (IDP) (SD013) providing an understanding of the infrastructure needs. Whilst the scale of development is considered to be significant, the assessment found that it had well defined boundaries, which helped inform the extent of the site to be safeguarded, in accordance with NPPF paragraph 139 f) which requires Green Belt boundaries to be defined clearly using recognisable features that are likely to be permanent. The boundaries of the proposed safeguarded land fulfil this requirement through the use of existing housing and adjacent highways.

The scale of the site also enables mitigation for some of the identified constraints to be overcome, ie. it is of a scale where the necessary upgrading of the adjacent Houghtons Lane, and a link to the A580 could likely be justified, as well as public transport facility improvements. Further, the Green Belt Review considered there would likely be a need for a new primary school given the scale of the site. The delivery of transport / highways upgrades as well as the provision of new and enhanced social infrastructure, due in large

part to the identified scale of the site, are significant benefits that justify the scale of the site proposed. A site of a reduced scale in this location may not be able to deliver the required infrastructure, or be justified by clearly defined boundaries.

*35. Should 8HS be allocated rather than safeguarded so that it can contribute to meeting needs in the Plan period?*

The Council does not consider there is any justification to allocate this site. There is a robust housing supply over the plan period to meet the identified need, even in the event the plan period is extended to 2037.

Furthermore, the Council is seeking to maximise housing delivery on previously developed land within existing urban areas, in accordance with section 3 of Policy LPA02. To change the status of this site from safeguarded to allocated, when there is considered to be a robust supply of sites to meet identified needs over the plan period, would risk undermining this approach. It would lessen the Council's ability to phase the development of previously developed land ahead of that in the Green Belt. This in turn would not align with the Plan's strategic aim of "supporting regeneration and balanced growth".

Furthermore, notwithstanding the exceptional circumstances for safeguarding this site set out in the GBR, it is affected by a number of potential constraints. Whilst these can be mitigated, some measures may take a considerable amount of time, ie. the likelihood of this land providing functionally linked land habitat for bird species, as highlighted in the Habitats Regulation Assessment. If this is confirmed, a suitable and deliverable mitigation strategy will need to be agreed and implemented. Such mitigation requirements, and the potential timescales involved, make this site more acceptable for safeguarding rather than allocating in this Plan.

*36. Are the requirements for the Site 8HS within Appendix 7 (Site Profiles) necessary, positively prepared and effective?*

The inclusion of site profiles illustrates that sites are developable in the long-term and justifies their removal from Green Belt. The profile for 8HS profile provides both developers and local residents with guidance setting out the requirements necessary for any future development proposal on this safeguarded site. They are considered necessary, positively prepared and effective.

Outcomes from the GBR stage 3 assessments for sites 8HS are reflected in the requirements in the site profile, for example, the requirement for Houghton's Lane to be upgraded and diverted, and a new access from A580 at Houghton's Lane junction. The site-specific nature of the profile increases its effectiveness and makes all parties aware of what will likely be required to successfully bring forward development in this location in the longer term, subject to the allocation of this site in a future Local Plan. The requirements set out are therefore also considered necessary and contribute to the positive preparation of the Plan.

*37. Is the configuration of Site 10HA justified taking into account the extant planning permission?*

As referred to in response to question 30 (with details provided in the LPSD Appendix 5 site profile), the site as a whole is subject to planning permission, with a reserved matters application for the initial phase now under consideration.

The proposed allocation has taken account of the site's planning history. Given the progress made, including the £2 million secured to accelerate delivery of the site through a financial contribution to the construction of a spine road and associated infrastructure, the configuration of site 10HA is considered justified.

*38. Are the requirements for Sites 6HA and 10HA within Policy LPA05.1 (Section 2) and Appendix 5 (Site Profiles) positively prepared and effective?*

Whilst the Council considers the requirements listed within Policy LPA05.1, section 2 to be effective in ensuring the delivery of high quality developments, it is acknowledged that given the planning status of sites 6HA (with a resolution to grant planning permission from the Council's Planning Committee) and site 10HA (with a planning permission for the whole site already granted and a reserved matter application for the first phase currently under consideration), the necessity of the LPA05.1, section 2 requirement for a comprehensive masterplan for these sites to be submitted with the planning applications, might be queried.

However, until the sites are clearly under construction and building out in accordance with the approved plans, the Council is of the view that the requirement for a masterplan remains relevant and should be retained in the Policy in respect of these sites. Whilst the Council sees no reason for these sites to not come forward and be developed as anticipated, particularly given the recent progress in relation to both, there is still a remote possibility that the sites will not be built out, and permissions could expire. In that eventuality, and should new planning applications come forward, the requirement in Policy LPA05.1, section 2 will be relevant and necessary to ensure the delivery of high quality development. Therefore this requirement is still considered effective and positively prepared.

Appendix 5 site profiles include site specific requirements informed by the evidence base, including the Infrastructure Delivery Plan (SD013) and the outcomes of the site assessments in the Strategic Housing Land Availability Assessment 2017 (SHLAA) (HOU002). These are to ensure the delivery of high quality and well designed schemes. For the same reasons provided above, it is considered that these ought to remain in the Plan to ensure the Plan is positively prepared and effective.

*39. In particular in relation to Site 10HA, will the Plan ensure that any playing fields lost will be replaced by the equivalent or better provision?*

Within the LPSD, Policy LPC05 requires that development proposals resulting in the loss of open space (including outdoor sports provision) will only be permitted where 1) it is clearly demonstrated that the open space is surplus to requirements; 2) the open space lost would be replaced by equivalent or better provision in a suitable location; or 3) the proposed development is for alternative sports and / or recreational provision, outweighing the loss of the existing open space.

In addition, and with particular reference to site 10HA, the replacement of any playing pitches is outlined as a requirement in its Appendix 5 as follows:

- “Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03. Any loss of existing playing fields must include replacement provision of an equal (or improved) quantity and quality.
- Playing pitches within the site must be suitably replaced off-site before they are lost as part of the development.”

Therefore, the Plan has provisions in place to ensure that the loss of any playing fields will be replaced by the equivalent or better provision, where justified.

*40. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities within Tables 4.1, 4.5 and 4.8 justified and effective?*

The site area and appropriate uses for site allocation 11EA in Table 4.1 are based on the planning consent on the site that is currently under construction, so these are considered to be fully justified and effective.

The Council has applied a net developable area of 75% for sites 6HA and 10HA, following a standardised approach to all proposed housing site allocations in the LPSD, except where the evidence suggests that the NDA should be amended to reflect the presence of constraints on site. However, this has not been considered to be the case for 6HA and 10HA.

This is consistent with the NDA applied in both the Strategic Housing Land Availability Assessment (SHLAA) (HOU002) and the St Helens Economic Viability Assessment (VIA001). Details of this approach are set out in the SHLAA (HOU002, Figure 3.8, page 16). As a result, the Council consider that the NDAs set out are justified and effective.

With reference to site 8HS, a slightly lower NDA of 65% has been applied due to known constraints on-site, as set out in the Green Belt Review which will be further explored in due course should the Council seek to allocate this site in a future Local Plan.

Similarly, to the NDA, evidence-based documents including the Strategic Housing Land Availability Assessment (SHLAA) 2017 (HOU002) have informed the minimum densities included within table 4.8. The rationale for the applied densities included in the SHLAA

(outlined in paragraph 3.47 and Figure 3.9 of the SHLAA 2017 (HOU002)) has been a basis for the densities applied to the proposed SHBLP safeguarding housing sites.

The Council acknowledges that densities may vary depending on site characteristics and the need to respect local character. However, it is not expected that they will fall below those set out in Tables 4.5 and 4.8 in relation to sites 6HA, 10HA and 8HS due to the locational properties of each site, access to amenities such as public transport services and known site constraints. Indeed, given the location of sites 6HA and 10HA in the urban area particularly, it is reasonable to expect that these sites will have a higher density, as set out in Table 4.5.

It is acknowledged that site 6HA has recently benefitted from a resolution to grant outline planning permission for up to 1,100 dwellings. This is reflected in the Appendix 1 site trajectory for 6HA in SHBC007. Table 4.5 indicates the site capacity as being 816 dwellings, so this would benefit from being updated to align with the updated housing supply information provided in SHBC007.

The site capacities in relation to sites 10HA and 8HS are considered to be justified and effective. The capacity provided for site 10HA takes account of the planning status of the site. In relation to site 8HS, the capacity takes account of the identified constraints on site, and is considered robust. However, it is acknowledged in the footnotes to Table 4.8 (page 51) that the capacity of safeguarded sites would be assessed further prior to any decision to allocate the site in a future plan.

*41. Does the Plan contain sufficient safeguards so that the development of Site 6HA would not prejudice adjoining employment uses?*

In the Council's response to question 33 in SHBC005, it is stated that the employment uses adjoining the proposed allocation of 6HA would not be adversely affected by future development of the site. Access to the employment uses would be by a separate access and mitigation has been considered as part of the recent planning application process. The resolution to grant permission reflects the adequacy of the mitigation proposed to ensure that the adjoining uses are not prejudiced.

In terms of the Plan, the Appendix 5 site profile for site 6HA includes a requirement for any development proposal to "include appropriate measures to attenuate noise from the adjacent employment use(s)". Furthermore, Policy LPA03, section 5a) requires "high quality design in all development and a high standard of amenity for all existing and future occupants of land and buildings".

When read as a whole, the Plan provides sufficient safeguards against prejudicing the employment uses adjoining site 6HA.

*42. Will infrastructure to support the allocations be delivered at the right time and in the right place?*

The necessary infrastructure for sites 6HA and 10HA has been considered through their respective planning application processes, and on the basis that 10HA has planning permission, and site 6HA has a resolution to grant planning permission, the Council has confidence that that the infrastructure will be delivered at the right time and in the right place. This is particularly highlighted at site 10HA where £2 million has been secured to accelerate delivery of the site through a financial contribution to a spine road and associated infrastructure, and groundworks for this have begun.

Notwithstanding this, the Economic Viability Assessment (VIA001, Table 6.19 shows these sites to be viable, and the Council is confident that the necessary infrastructure can be delivered. It should also be noted that the Council is pro-active in terms of securing funding for brownfield sites where this is considered necessary to drive forward their delivery, as shown in the £2 million funding already secured for site 10HA.

It is therefore the case that the necessary infrastructure to support these allocations will be delivered.

*43. Are there any barriers to Sites 6HA and 10HA coming forward as anticipated by the housing trajectory?*

The Council does not anticipate any barriers regarding sites 6HA and 10HA coming forward for development as set out within the updated housing trajectory (Appendix 1, SHBC007).

With reference to site 6HA, Planning Committee recently resolved to grant planning permission which provides a greater degree of certainty regarding site delivery. In addition, extensive site remediation has occurred in recent years to prepare the site for development.

With reference to site 10HA, a planning application was submitted in January 2021 relating to phase 1 of the Moss Nook site, where a decision is awaited. Groundworks for the construction of a spine road to support the delivery of phase 1 of the site as well as future phases are underway, utilising the £2 million funding secured by the Council. This provides confidence in the ability of this site to deliver, and is anticipated in the trajectory.

As both sites have obtained planning permission (6HA subject to the final agreement of the associated s106) and have strong developer interest, the Council considers that the trajectory for their delivery is reasonable, and there are no known barriers to their delivery.

## **Issue 5: Other Green Belt boundaries**

*44. Are the Green Belt boundaries elsewhere in Bold, Eccleston, Sutton Manor, Thatto Heath and St Helens Core Area justified?*

Yes, the Council considers the Green Belt boundaries in these areas to be justified subject to the changes proposed in the Green Belt Review in terms of the proposed site allocations, and land designated for safeguarding, as well as the associated consequential changes (Appendix J) and identified anomaly changes (Appendix I) (SD020).

There is only one minor further change the Council would wish to flag up in this area of the Borough and that is in relation to an area of existing Green Belt at the junction of the A580 East Lancashire Road and Carr Mill Road. In this location, the Green Belt extends a little too far south onto the site known as land adjacent Laffak Road and Carr Mill Road (see site reference 82 on page 29, SHBC004). The Green Belt boundary in this location should align with the A580, and not overlap with the aforementioned site.