



# Hearing Statement

St Helens Borough Council Local Plan

Matter 4, Issue 3

*on behalf of:*

Mulbury (Warrington) Ltd

Land at Eccleston Park Golf Club

(3HS)

May 2021

*Prepared by*

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## 1. INTRODUCTION & CONTEXT

### Purpose

- 1.1 This Written Statement has been prepared by SATPLAN LTD in connection with the Examination in Public of the St Helens Borough Council Local Plan.
- 1.2 It specifically addresses the Inspectors Matter 4, Issue 3 in relation to land safeguarded at Eccleston Park Golf Club (3HS). A Site location Plan is included at Appendix 1.
- 1.3 A planning application (reference P/2020/0791/HYEIA) is currently under consideration by St Helens Borough Council for the following development:

*Hybrid Planning Application comprising of Outline Consent for up to 646 dwellings (Parcels 1(a), 2, 4, 5, 6 & 7) up to 4,000 Sq ft of Convenience Retail (E(a) Use) and up to 7,100 Sq ft E(f) Nursery. Detailed planning permission for 168 dwellings (Parcel 1) and 186 dwellings (Parcel 3), including access road in detail from Rainhill Road and Portico Lane, landscaping, scale, design and associated infrastructure (EIA Development).*

- 1.4 The Site is within a single ownership and is owned by Mulbury (Warrington) Ltd. The Site had previously been owned and promoted by Crown Golf during the earlier stages of St Helens Local Plan. The Site was previously allocated for residential development within the St Helens Preferred Options draft plan. This Hearing Statement will provide additional evidence to demonstrate why the site should continue to be allocated for Housing in the Submitted Local Plan.
- 1.5 The Site extends to an area of c48.3Ha site (excluding 0.5ha of existing residential development - 18no. residential units located adjacent to the former club house). The former Golf Club ceased operation in June 2018 further to a period of dwindling Memberships.

### References

- 1.6 This Written Statement relies upon and should be read in conjunction with the documents constituting the Examination Library.

## 2. RESPONSE TO MATTER 4- ECCLESTON (3HS)

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

2.1 The applicants are currently reviewing and responding to consultee comments that have been made. An extension of time has been agreed with the Council to 30<sup>th</sup> July 2021 to allow time for the preparation and submission of additional material in response to the matters that have been raised. The key matters the applicants are responding to are:

- Highways
- Layout & Design
- Open Space
- Landscape
- Sport England/Leisure

*Question 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?*

2.2 The NPPF sets out a presumption in favour of sustainable development under which local planning authorities should *'...positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change...'* and *'provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas'*. The NPPF also confirms that *'...once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...'*

2.3 Both the Council's Green Belt Review 2016 [GRE001] and updated Green Belt Review 2018 [SD020] provide the evidence to demonstrate that exceptional circumstances exist to justify the proposed changes to the Green Belt boundary in St Helens and that there are no suitable

reasonable alternatives to avoid the release of Green Belt land. This is specifically outlined in paragraphs 1.12 – 1.21 of the 2018 Green Belt Review.

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

- 2.4 It is clear the Council have demonstrated that exceptional circumstances exist to justify the proposed changes to the Green Belt boundary in St Helens and there are no suitable reasonable alternatives to avoid the release of Green Belt land. This however is not specifically set out within the Local Plan but is explained in the Green Belt Review 2018 [SD020].
- 2.5 Despite this, we consider that the Plan is consistent with Paragraph 139 of the National Planning Policy Framework but suggest it would be beneficial to provide additional supporting text to both Policies LPA05.1: Strategic Housing Sites and LPA06: Safeguarded Land.

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

- 2.6 Yes. The Sites identified as safeguarded land sites are in accordance with delivering policy LPA06: Safeguarded Land. To not release Sites from the Green Belt would lead to a significant undersupply of homes in the long term compared to the identified needs (both market and affordable housing). This would lead to further issues of housing affordability, access to housing for younger households and competition for existing employment sites. Failure to identify sufficient land for employment uses would also have an adverse impact on the economy of the Borough and its contribution to the wider City Region, potentially increasing unsustainable commuting patterns.

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

- 2.7 Eccleston Park Golf Club was previously proposed by the Council as an allocated Site for residential development (reference HA8) at the Local Plan Preferred Options stage in December 2016 [LPI003].
- 2.8 Table 5.4 within the Green Belt Review 2018 [SD020], provided the comments and justification as to why Sites have been allocated, safeguarded or discounted. The table highlighted a number of perceived (*with emphasis*) constraints; however, these were unsubstantiated and not correctly balanced against the planning merit of bringing forward the Site for development, when compared against other Sites which have been taken forward as allocations in the current Local Plan period, or those PDL Sites presumed to be deliverable. Site 3HS - Eccleston Park Golf Course is 'deliverable' and 'developable' within the meaning of the NPPF, as it is available now for development having been closed as a golf club since mid-2018.
- 2.9 Whilst the Council cites several perceived constraints, additional evidence was provided to the Council through our representations at the Submission Version Consultation Stage to address these constraints and concerns.
- 2.10 Pages 117-119 of table 5.4 provided the conclusions in relation to our client's site. The table below sets our response to the published conclusions.

St Helens Council Conclusion	Response
There are a number of constraints which would have a significant impact on overall NDA and deliverability of development.	The Council fails to provide any detail or evidence regarding the constraints that are said to have a significant impact on NDA and the deliverability of this Site. This matter is considered in greater detail at Section 5 of these representations, but importantly the

St Helens Council Conclusion	Response
	current planning application clearly demonstrates the Site can deliver up to 1000 dwellings.
Parcel constitutes a major area of mainly greenfield land, its release for development and timing would need to be clearly justified in the light of the Council's objective of making efficient use of PDL to meet development needs.	The Council's objective of making efficient use of PDL to meet development needs is acknowledged but a number of delivery assumptions and capacity for previously developed sites are highly questionable (as set out in our previous representations). Furthermore, other Greenfield Greenbelt Sites have been allocated for residential development, as such the arguments advanced by this conclusion are fundamentally flawed.
Parcel has good levels of accessibility to service and public transport etc Scope to improve facilities at the adjacent railway station by provision of car parking	We agree the Site is highly sustainable and accessible. The Site offers the opportunity to provide parking for the adjacent Railway Station (Eccleston Park), such provision is included in the current planning application.
Substantial constraint is the golf course. This is a valued recreational facility. National policy seeks to protect it. At LPPO stage, Sport England objected to the allocation of the site for housing. Further evidence has not been obtained, meaning that the allocation would conflict with national policy	The golf club closed in Summer 2018 and the site is not accessible to the public. A Golf Needs Assessment has been undertaken by Tetra Tech. This clearly illustrates that the loss of this facility is not detrimental to the recreational amenity of the borough. It should be noted that remaining Members from EPGC have now found new facilities. This substantial

St Helens Council Conclusion	Response
	<p>constraint (as identified by the Council) is no longer relevant.</p> <p>Sport England have been consulted on the current planning application, the updated Sports Needs Assessment responds to the matters they raise and along with amendments that are currently being incorporated to the Masterplan, it is our firm view that this matter has been fully addressed and no longer can form a constraint to development.</p>
<p>Constraint of the highway network- Number of junctions in the area experience capacity issues that are likely to be difficult to improve practicably or economically</p>	<p>A detailed Transport Assessment has been completed and has been the subject of discussions with the Highways Authority and their retained advisors. The applicant is nearing the completion of the additional justification sought by the Highways Authority and this will be submitted to the Council within the next few weeks.</p>
<p>Knowsley Council (Highways Authority) objected to the allocation at LPPO stage. Constraints are considered likely, in absence of evidence to the contrary, to at least substantially limit the residential capacity of this large parcel.</p>	<p>Knowsley Council has not submitted any evidence in support of this assertion that we are aware of to substantiate these assertions. To the contrary, the TA that we have prepared confirms the Site could accommodate up to 1,000 dwellings. It is however noted that Knowsley Council has submitted comments to the current planning application, however, the applicants</p>



St Helens Council Conclusion	Response
	Highways Consultants have responded to these matters and we believe all highways matters will be addressed to the satisfaction of the Highways Authority.
<p>Number of physical constraints eg Pylons/ railway line adjacent to the site. Appropriate buffer zones would be required to protect residential amenity.</p> <p>This would reduce NDA</p>	<p>Substantial investigations have been completed by the Site Owner. A constraints plan is included at Appendix 2. This clearly demonstrates the impact of the constraints referred to by the Council. Appropriate buffer zones and wayleaves can be accommodated within this Site whilst still supporting up to 1,000 dwellings and other uses as proposed, all constraints have been taken into account within the Masterplan that forms part of the current Planning Application (Appendix 3) and no objections have been advanced by bodies such as the Environment Agency or United Utilities.</p>
<p>Buffer required to protect woodland</p> <p>This would reduce NDA</p>	<p>The revisions that are being undertaken to the Masterplan increase buffers to the Woodland where needed, however, this does not affect the overall NDA for the Site.</p>
<p>UU has advised that a number of major infrastructure assets run through the parcel.</p> <p>This would reduce NDA.</p>	<p>The Site owner is fully aware of the assets that pass under this Site. Detailed work has been undertaken (in conjunction with UU) to establish the detailed routing and depths of these assets. Whilst the NDA is reduced by these assets, the constraints plan demonstrates that up to 1,000 dwellings can be achieved from this Site. It should</p>

St Helens Council Conclusion	Response
	also be noted that UU have not objected to the current planning application.
The 2018 SA assessed the parcel and concluded that development within it would have a positive impact on the achievement of a number of SA objectives	We welcome this and further argue that the site is highly sustainable, accessible, provides no contribution/purpose to the Green Belt. The site is wholly appropriate to be allocated for development within the plan period.
The parcel is considered suitable for removal from the Green Belt but more evidence is needed to justify the loss of the former golf club and to ascertain the contribution the parcel can make to meeting housing needs. Therefore, this parcel is not required to meet the needs within the plan period and is now safeguarded rather than allocated.	We agree that the parcel is suitable for removal from the Green Belt. Evidence has been prepared to justify the loss of the golf club in the Golf Needs Assessment. The site is capable of meeting housing needs and should be allocated for development in the plan period, rather than Safeguarded.

2.11 As outlined above, the Site is evidently deliverable and capable of contributing to the meeting the development needs of the Borough in the Plan Period to provide much needed housing in St Helens (both market and affordable). This is further evidenced by the current planning application for the Site, the current position of the planning application is provided in Question 23 above.

2.12 Our clients Site continues to be a sound choice to be allocated for development within the plan period as it was in the previous version of the Local Plan Preferred Options Consultation [LPI003]. This Site offers the opportunity to deliver a significant quantum of housing, both Market and Affordable along with significant areas of open space which will be available for nearby residents to enjoy.

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

2.13 The requirements contained within Appendix 7 for Site 3HS are positively prepared and effective. Furthermore, the requirements are fully addressed as part of the current planning application for the Site.

Appendix 7 Requirements	Planning Application Submission
Appropriate highway access should be provided via a primary access from the B5413 Rainhill Road and secondary access at Portico Lane together with a suitable internal road network.	The Masterplan submitted as part of the current hybrid planning application (included at Appendix 3) makes provision for two Site Access points, one from Rainhill Road and the other from Portico Lane. A central spine road configuration connects to either access point to ensure full permeability of the Site and to make provision for public transport provision within the Site.
The layout and design of the development should make suitable provision for a bus service to access the primary access road and consider feasibility of a bus throughroute from Portico Lane to Rainhill Road.	Included within the Masterplan at Appendix 3 as outlined above.
Safe pedestrian and cycle access should be provided to Eccleston Park Station.	The Masterplan makes provision for a dedicated cycle route through the Site from Rainhill Road in the East to Portico Lane in the West. Throughout its route the cycle path interconnects with shared pedestrian / cycle routes within the Site.
Consideration should be given to the potential for park and ride facilities.	Whilst Park and Ride facilities of a strategic nature would not be appropriate, the

	Masterplan does make provision for 30 spaces adjacent to Portico Lane which is a 2 minute walk from Eccleston Park Train Station.
Any access to the site from Two Butt Lane must, at most, serve only a limited number of properties and be agreed by Knowsley Council as the Highways Authority.  Ensure that the design and layout mitigates and minimises impacts on the existing road network, including the Rainhill Road/Warrington Road junction and other junctions in the area.	The Masterplan shows an independent access to serve only a very small number of properties. The Access from Two Butts Lane does not provide vehicular access to the wider Site, albeit pedestrian routes are provided to facilitate permeability and accessibility to open space within the wider Site and to public transport infrastructure. The Transport Assessment which supports the Planning Application demonstrates there is no adverse impact to the Rainhill Road/Warrington Road junction and other junctions in the area.
Financial contributions for education and off-site highway works may be required; this will be subject to further assessment at the master planning stage.	The Education Authority has identified a payment of £326,477 for Primary School provision and £183,536 for Secondary School provision which is agreed by the applicant. At this stage, no sums have been identified for off-site highways works, but such costs will be met by the applicant where these are justified.
The sandstone wall on the Rainhill Road frontage should be reclaimed and rebuilt once the access road is constructed.	Agreed – this can be secured by Planning Condition as part of any subsequent planning approval.
The developer should liaise with the Lead Local Flood Authority in the design of a suitable and ecologically friendly flood management solution for the on-site open watercourse. The development should incorporate measures to “slow the flow” to	At the time of writing this Statement, an updated response is awaited from the LLFA, however, the Flood Risk Assessment and Drainage Assessment submitted with the planning application demonstrates there no reasons to

reduce the risk of flooding downstream and enhance biodiversity.	prevent the development of this Site for the quantum of housing proposed.
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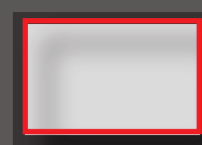
*Question 29) Are the net developable areas, minimum densities and indicative site capacities within Table 4.8 justified and effective?*

- 2.14 Table 4.8 outlines a NDA of 65% and a indicative capacity of 956 dwellings. The Masterplan that informs the current planning application shows a capacity of up to 1,000 dwellings and a net developable area of 29 hectares or 58% of the Site. It should be noted that areas of open space within the proposals total 20.91 hectares.
- 2.15 As evidenced by the current planning application, the assumptions within the table are accurate justified and effective. We concur with the assumptions set out in this table.
- 2.16 In conclusion, it is our firm view there was no reason to downgrade this Site from its previously draft allocation status to safeguarded. The planning application that has been referred to within this Statement very clearly demonstrates the deliverability of this Site and addresses the reasons reported by the Council for its downgrading.

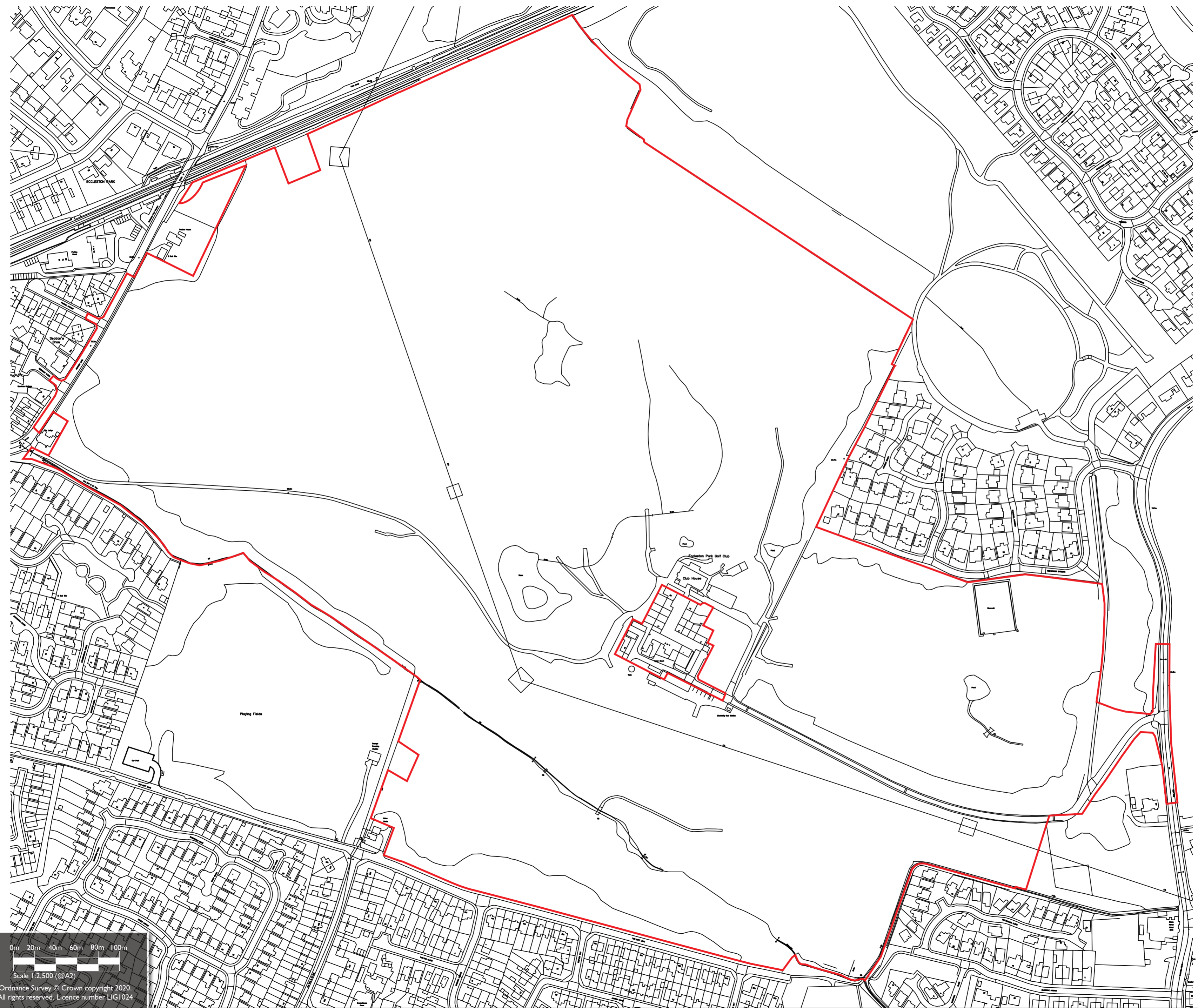

## APPENDIX 1 – SITE LOCATION PLAN



**Key**



Application Boundary

0m 20m 40m 60m 80m 100m

Scale 1:2,500 (@A2)

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**e\*SCAPE**  
urbanists

Project Title  
Land at Eccleston Park, St Helens

e\*SCAPE Job No.  
017-031

Client  
Mulbury (Warrington) Ltd

Drawing Number      Revision  
017-031-P007      REV -

Drawing Title  
Application Boundary Plan

Scale      Date  
1:2,500 @ A2      November '20

## APPENDIX 2 – CONSTRAINTS PLAN

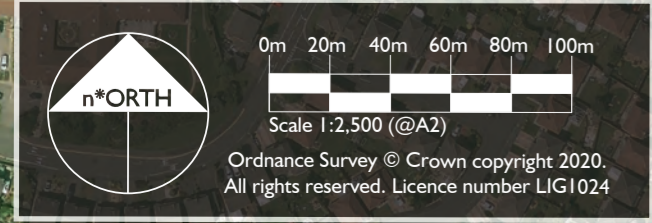






### Key

	Ownership Boundary		Sensitive Residential Interface
	Overhead Power Lines (275kw) (50m Easement)		United Utilities Combined Sewer (Easements unknown)
	Native Hedgerow		Treated Water Main (14m Easement) (30.5m Easement)
	Waterbodies/watercourse		United Utilities Surface Water Sewer (Easement unknown)
	Existing Trees/Hatch = Cat B & RPA)		United Utilities Foul Water Sewer (Easement unknown)
	Railway Line		United Utilities Potable Water
	Proposed Site Access		Surface Water Outfall from reservoir
	Potential Pedestrian Access		Existing Footpaths (Permissive & Definitive)
	Eccleston Park Train Station		Existing Buildings
	Existing Green Infrastructure		Potential Green Link
	Bus Stops		Noise Source (Offset Required)
	Potential Pedestrian Connections		




## APPENDIX 3 – MASTERPLAN





### Key

-  Application Boundary
-  Proposed Houses
-  Streets
-  Shared Surface Drives and Lanes
-  Shared Pedestrian/Cycle Routes
-  Cycle Route
-  Green Infrastructure
-  Existing Ponds & Proposed Detention Basins
-  Existing/Proposed Trees (Indicative)
-  Community Orchard
-  Proposed Sports Pitches
-  Electricity Pylon
-  ① Green Keepers Shed Retained
-  ② Ryder Court
-  ③ Existing Pond Enlarged
-  ④ Existing Access Road

 n\*ORTH  
 0m 20m 40m 60m 80m 100m  
 Scale 1:2,500 (@A2)  
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**e\*SCAPE**  
 urbanists  
 Project Title  
 Land at Eccleston Park, St Helens  
 e\*SCAPE Job No.  
 017-031  
 Client  
 Mulbury (Warrington) Ltd  
 Drawing Number  
 017-031-P009  
 Revision  
 REV -  
 Drawing Title  
 Coloured Masterplan  
 Scale  
 1:2,500 @ A2  
 Date  
 October '20