

# **EiP Statement**

## **St Helens Delivery and Allocations Local Plan**

### **Taylor Wimpey UK Limited**

#### **Representor ID RO1154**

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**Our ref** 41874/04/CM/MKR  
**Date** 21 May 2021

**Subject** **Matter 4 – Allocation, Safeguarded Land and Green Belt Boundaries – Bold, Eccleston, Sutton Manor, Thatto Heath and St Helens Core Area**

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#### **1.0 Introduction**

- 1.1 Lichfields is instructed by Taylor Wimpey UK Limited [TW] to make representations on its behalf to the St Helens Borough Local Plan 2020-2035 [SHLP].
- 1.2 This Statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 4 Examination in Public [EiP] hearing session.
- 1.3 Separate representations have been submitted in respect of the following Matters:
- 1 Matter 1 – Legal Compliance, Procedural Requirements and the Duty to Cooperate
  - 2 Matter 2 – Housing and Employment Needs and Requirements
  - 3 Matter 3 – Spatial Strategy and Strategic Policies
  - 4 Matter 5 – Housing Land Supply
  - 5 Matter 7 – Specific Housing Needs and Standards
  - 6 Matter 9 – Generic Policies
  - 7 Matter 10 – Infrastructure and Delivery
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the SHLP [Representator ID RO1154] as well as those made on other Matters listed above.
- 1.5 TW is seeking to bring forward a high quality, well designed and sustainable strategic residential site at Gartons Lane, St Helens [Local Plan Site Reference: 5HA] and a site at Gorse Lane, St Helens which forms part of the wider Bold Forest Garden Suburb [Local Plan Site Reference: 4HA]. TW is supportive of the allocation of the sites in the SHLP and considers that the identification of both sites as residential allocations will assist in boosting the supply of housing in St Helens. It will also assist in delivering sustainable development by contributing towards meeting the needs of market and affordable housing, creating employment during the construction period and mitigating any impact on the environment.
- 1.6 This statement expands upon TW's previous representations made throughout the Local Plan preparation process in light of the Inspector's specific issues and questions. Where relevant, the comments made are assessed against the tests of soundness established by the National

Planning Policy Framework [NPPF] and the National Planning Policy Practice Guidance [Practice Guidance].

## **2.0 Planning Issues**

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

*Q12: 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?*

2.1 TW considers that exceptional circumstances have been robustly demonstrated by the Council to justify the alteration of the Green Belt in St Helens. The Council has undertaken a comprehensive review of non-Green Belt sites to justify the exceptional circumstances case. Further detail is set out in TW's response to Q4 of Matter 3 which details the exceptional circumstances that are present in St Helens to justify the release of land from the Green Belt and in particular sites 4HA and 5HA. To summarise the exceptional circumstances are:

- 1 Based on the identified housing requirement, the Council has an identified shortfall of at least 2,034 dwellings over the Plan period to 2035 (the shortfall increases further over the extended plan period) which can only be accommodated through the release of sites from the Green Belt.
- 2 The Council has considered the potential for optimising densities on their urban sites but this could result in unacceptable loss of recreational areas, undeliverable schemes and harm existing infrastructure capacity.
- 3 Surrounding authorities are all constrained by Green Belt and cannot accommodate any of St Helens housing needs without Green Belt release. A number of the surrounding authorities have either reviewed their Green Belt boundaries or are about to review their boundary through emerging plans.
- 4 The St Helens Core Strategy (2012) acknowledged that some Green Belt release would be required for new housing development from 2022 onwards.

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2.3 TW therefore considers that exceptional circumstances are present to release 4HA and 5HA in this Plan. The development of these sites align with the spatial strategy and will act as catalysts for transformational change in the area. The identification of these sites for release also accord with the findings of the detailed Green Belt Review undertaken by the Council to inform their plan.

2.4 The release of strategic Green Belt sites is required to facilitate identified housing needs and wider economic and social aspirations. These Green Belt sites will be delivered alongside the brownfield land development proposals in the SHLP to help SHBC meet its housing needs. The proposed strategic release of the identified sites also aligns with the wider aspiration and spatial strategy for the Plan including acting as a catalyst for transformational change in St Helens.

*Q13: If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?*

2.5 As set out in detail in our response to Matter 3, Taylor Wimpey is of the opinion that exceptional circumstances exist in St Helens to justify the release of land from the Green Belt and the release of land from the Green Belt to accommodate future development needs aligns with the spatial

strategy of the plan. The evidence has been prepared and presented by St Helens Council in the evidence base underpinning the plan particularly in Section 8 of Developing the Spatial Strategy Background Paper (October 2020) and is considered sufficient.

*Q14: Are the configuration and scale of the allocations justified taking into account development needs, the Green Belt assessments and land ownerships?*

### *Development Needs*

- 2.6 The spatial strategy identifies that a minimum of 9,234 additional dwellings need to be delivered before the end of the SHLP period. Allocations 4HA and 5HA have been identified to meet the needs of St Helens in accordance with the spatial strategy. The scale of 4HA and 5HA are therefore appropriate to meet these needs.
- 2.7 The release of Allocations 4HA and 5HA forms an integral component to meeting the vision set out in the AAP. Both sites will assist with the delivery of a sustainable form of development and provide economic, social and environmental gains in accordance with the objectives of the NPPF [§8].

### *Green Belt Assessments*

- 2.8 At Stage 1A of the Green Belt Review (2018), the Council dived the whole of the St Helens Green Belt into parcels of land for assessment. The parcels take account of the existence of recognisable visible boundaries; adjacent areas of similar land use or characteristics, and the relative degree to which areas are enclosed or confined by features such as urban areas, woodlands, roads or railways. TW considers that the definition of land parcels at Gartons Lane and Gorsey Lane for the purpose of the Green Belt Review were justified and effective.
- 2.9 The Gartons Lane site (Allocation 5HA) is identified as Parcel GBP\_o8o in the Green Belt Review. The site is assessed as making a 'low' contribution to the overall function of the Green Belt. With regards to Purpose 1 (to check the unrestricted sprawl of large built-up areas) where containment is considered, Gartons Lane scored 'low' because the site is substantially contained by residential properties. To the north the site is bounded by residential properties fronting Garton Lane, to the east by residential properties in Clock Face and to the west by residential properties on Jubits Lane. Sutton Manor Woodland provides a firm natural boundary to south of the site.
- 2.10 The parcel of land owned by TW at Gorsey Lane was assessed in the Green Belt Review as sub-parcel GBP\_o74D. The wider parcel GBP\_o74 parcel mostly comprises the land allocated as the Bold Forest Garden Suburb (Allocation 4HA). As set out in the Green Belt Review, the strategic allocation is bound by strong, robust physical boundaries, including Gorsey Lane to the south.

### *Land Ownership*

- 2.11 TW controls over 95% of the land that falls within the Gartons Lane site (5HA). TW is committed to delivering the allocation as soon as possible following the adoption of the SHLP.
- 2.12 TW has previously requested that the proposed Gartons Lane allocation boundary is amended to include the land currently occupied by the farm buildings and Church fronting Gartons Lane. The parcel of land occupied by the farm building is under the same ownership as the wider Gartons Lane site and there is a willing landowner. Similarly, Taylor Wimpey is in discussions with the Diocese of Liverpool in relation to the land occupied by the church and incorporating the land for redevelopment within the wider comprehensive masterplan is possible. There are

no reasons why these small brownfield sites on the northern side of the site cannot be delivered in conjunction with the wider allocation.

- 2.13 The Bold Forest Garden Suburb (Allocation 4HA) Position Statement states that a lead in time of seven years has been applied to allow for a thorough masterplanning exercise. TW is committed to delivering their element of the allocation as soon as possible and is willing to engage with the Council on securing a deal to developer their land holding in a comprehensive manner too. One of the main access points to the Bold Forest Garden Suburb is located at the parcel of land which TW control. TW considers that this land could be brought forward for development whilst the masterplanning exercise is being undertaken for the wider allocation albeit Taylor Wimpey recognise that an appropriately designed scheme will need to be delivered which does not hinder the delivery of the wider allocation. This will ensure there are no delays to the delivery of the Bold Forest Garden Suburb and a build out rate of more than 60dpa assumed in the plan can be delivered before the Council's claimed first completion year.

*Q15: Is the allocation of Site 4HA broadly consistent with the Bold Forest Park Area Action Plan?*

- 2.14 The Bold Forest Park Area Action Plan [AAP] was adopted in July 2017 and sets out detailed policies and actions for the development of the area. The AAP is a statutory document and forms part of the Development Plan for SHBC and Taylor Wimpey participated in the consultation exercises on the plan. The APP [§1.2.3] states that the Bold Forest Park area will contribute to meeting the Borough's housing and employment need, the level of which is to be determined through the Local Plan process and detailed in the SHLP. The Bold Forest Garden Suburb (4HA) totals 132.86ha and accounts for 7.3% of the Bold Forest Park area (1,808ha).
- 2.15 Policies in the AAP seek to ensure that new development in the Bold Forest Park area contributes to the further enhancements of the area, including contributing towards the infrastructure and improving connections with the urban area. As required by the NPPF [§138], these compensatory improvements will offset the impact of the Bold Forest Garden Suburb's removal from the Green Belt.
- 2.16 The SHLP sets out the requirements for the Bold Forest Garden Suburb (4HA) and states that development must be consistent with the vision, aims, objectives and policies of the AAP. In order to accord with AAP Policy INF6, the requirements for Allocation 4HA state that development must provide a choice of segregated foot, bridleway, and cycle routes through the site to facilitate access between homes, workplaces, recreational facilities, and other key services in the area. Development of the allocation is also required to promote extensive green links and tree planting to support the AAP objective to increase tree cover by 30% across the Bold Forest Park area.
- 2.17 In SHBC's Response to the Inspector's Initial Questions and Comments on Site Allocations and Safeguarded Land (Questions 23 -26), the Council explains how Allocation 4HA will accord with the policies in the AAP. SHBC has stated that a masterplan will be developed for the Bold Forest Garden Suburb. The masterplanning exercise will facilitate the delivery of the allocation in line with the objectives of the AAP, including critical infrastructure and design.
- 2.18 For the reasons set out above, TW consider that the allocation of the Bold Forest Garden Suburb (4HA) is consistent with the strategy and objectives of the AAP. The AAP policies have been incorporated within the requirements for Allocation 4HA at Appendix 5 of the SHLP and will ensure the development provides compensatory improvements in line with the NPPF [§138].

*Q16: 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?*

*Gartons Lane (Site 5HA)*

- 2.19 TW has undertaken an evaluation of the technical and environmental constraints that could prevent or restrict the development of the site at Gartons Lane (Allocation 5HA). No overriding constraints have been identified which would outweigh the benefits of delivering much needed family housing:
- **Green Belt Impacts** – The Green Belt Review concluded that the site makes a low overall contribution to the purposes of the Green Belt.
  - **Traffic** – The site is in a sustainable location with good accessibility by foot to the nearest local centre, bus stops and railway station. Suitable access to the site can be secured and there are no notable traffic impacts anticipated in relation to the development of the site.
  - **Air Quality** – The site is not within an AQMA and would not have any significant impact on the overall air quality.
  - **Agricultural land** – Part of the site includes Grade 3 agricultural land, but this does not preclude the release of the site from the Green Belt.
  - **Flood Risk** – The site is located within Flood Zone 1 and is designated as having less than a 0.1% annual probability of flooding from rivers or the sea in any given year.
  - **Ecology** – The site supports habitat of low ecological value and no significant ecological constraints have been identified.
- 2.20 In accordance with the NPPF [§11b (ii)], the presumption in favour of sustainable development has been fully considered in allocating the site for residential development. The technical work undertaken on the site demonstrates that no adverse impacts have been identified that would significantly and demonstrably outweigh the benefits of bringing Site 5HA forward for development.

*Gorse Lane (Site 4HA)*

- 2.21 TW has undertaken an evaluation of the technical and environmental constraints that could prevent or restrict the development of the southwest element of the Bold Garden Forest Suburb (4HA) which it controls. No overriding constraints have been identified:
- **Green Belt Impacts** – The Green Belt Review concluded that the site makes a low overall contribution to the purposes of the Green Belt.
  - **Traffic** – The site is well connected in terms of existing pedestrian infrastructure. It is in a sustainable location, including safe convenient accessibility by foot to the nearest local centre, bus stops and railway station. The site will provide a suitable access to the wider Bold Forest Garden Suburb (4HA).
  - **Air Quality** – The site is not within an AQMA and would not have any significant impact on the overall air quality. The 30% increased tree coverage across the Bold Forest Garden Suburb will support measures to improve air quality.
  - **Agricultural land** – Part of the site includes Grade 3 agricultural land, but this does not preclude the release of the site from the Green Belt.

- **Flood Risk** – The site is located within Flood Zone 1 and is designated as having less than a 0.1% annual probability of flooding from rivers or the sea in any given year.
- **Ecology** – The site supports habitat of low ecological value and no significant ecological constraints have been identified.

2.22 In accordance with the NPPF [§11b (ii)], the presumption in favour of sustainable development has been fully considered in allocating the site for residential development. The technical work undertaken on the site demonstrates that no adverse impacts have been identified that would significantly and demonstrably outweigh the benefits of bringing Gorse Lane forward for development.

*Q17: 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?*

2.23 TW considers that the requirements for Allocations 4HA and 5HA have been positively prepared and will support the promotion of sustainable transport modes and Green Infrastructure.

*Gorse Lane (Site 4HA)*

2.24 Overall, TW consider that the requirements for Allocation 4HA are effective in delivering a comprehensive scheme on the site and addresses all the relevant constraints. The requirements for the Bold Forest Garden Suburb (4HA) clearly set out that development must provide a choice of segregated foot, bridleway and cycle routes throughout the site. It is also stated that the layout must be compatible with the provision of a bus service through the site between Clock Face and St Helens Junction.

2.25 The site profile for Allocation 4HA also requires the provision of a well landscaped setting with extensive green links and tree planting so that it accords with the objectives of the Bold Forest AAP. It is anticipated that the masterplanning exercise for both sites will incorporate Green Infrastructure provision as a key element as well as promoting sustainable modes of transport.

*Gartons Lane (Site 5HA)*

2.26 As specified by the requirements for site 5HA, Gartons Lane will provide improved pedestrian, bridleway and cycleway links, improving the accessibility into Bold Forest Park and encouraging sustainable modes of travel. Gartons Lane will comprise a well planned development with improved Green Infrastructure to protect and enhance the landscape setting.

*Q18: Are the net developable areas minimum densities and indicative site capacities within Table 4.5 justified and effective?*

2.27 TW considers that the net developable area and minimum density figures are effective and justified for Allocations 4HA and 5HA. However, table 4.5 sets out that only 480 of the 2,998 dwellings at the Bold Forest Garden Suburb (4HA) will be delivered up to 2035. Whilst TW understands that SHBC has applied some caution to the delivery trajectory to enable the delivery of key infrastructure and masterplanning, all the land at the site has been actively promoted for development by the relevant landowners including the Council, promoters and developers. As such, 480 dwellings is the minimum and TW considers that Allocation 4HA can deliver significantly more housing over the SHLP period to 2035 as detailed masterplans are prepared and there is an ability to more effectively plan the site..

2.28 Furthermore, TW considers that the southwest element of Allocation 4HA which it controls should be brought forward in the first instance because it is adjacent to the existing settlement boundary and contains a primary access to the Bold Forest Garden Suburb from Gorsey Lane. TW is committed to delivering the site as soon as possible after the adoption of the SHLP in order to facilitate the delivery of the wider Bold Forest Garden Suburb.

*Q19: Should the Bold Forest Garden Suburb (4HA) have a bespoke policy in view of its scale?*

2.29 TW do not consider that the Bold Forest Garden Suburb (4HA) requires a bespoke policy. The requirements for the development of the site are clearly set out at Appendix 5 of the SHLP.

*Q20: Will infrastructure to support the allocations be delivered at the right time and in the right place?*

2.30 The 'requirements' text for the Bold Forest Garden Suburb (4HA) in the SHLP states that *'financial contributions or the provision of on-site infrastructure for education and offsite highway works may be required; this will be subject to further assessment at the master planning stage.'* As such, TW considers that any infrastructure requirements, such as contributions towards education, health etc., can be secured via S.106 agreement for both Gartons Lane and Gorsey Lane.

*Q21: Are there any barriers to Sites 4HA and 5HA coming forward as anticipated by the housing trajectory, for example land assembly/multiple ownerships?*

2.31 TW is not aware of any barriers to the development of either Allocation 4HA or Allocation 5HA. TW control over 95% of the land at Gartons Lane (5HA) and is committed to delivering the site as soon as the SHLP has been adopted with the intention of having an application ready for submission upon adoption.

2.32 Land ownership at the Bold Forest Garden Suburb (4HA) will not be a barrier to the site coming forward. The Green Belt Review (p.107) states that virtually all the land contained within the Bold Garden Village Suburb has been actively promoted for development by the relevant landowners, promoters and developers. TW is committed to developing southwest element of Allocation 4HA which it owns upon adoption of the SHLP. This will deliver a key access and facilitate the development of the remainder of the Bold Forest Garden Suburb in line or ahead of SHBC's current trajectory for the Allocation. Taylor Wimpey is of the opinion that the trajectory for the delivery of the Bold Forest Garden Suburb is cautious and commencement of the delivery of this sites, following the masterplanning process, could be quicker.