

St Helens Local Plan 2020-2035 Examination in Public

Hearing Statement on behalf of Story Homes

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

May 2021

Relevant Site:

Land south of A580 between Houghtons Lane and Crantock Grove, Windle (Ref: 8HS)

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Appendix A

Infrastructure Delivery Statement - Land South of the A580, Windle (Story Homes, May 2021)

1 Introduction

- 1.1 This statement has been prepared by Hive Land & Planning on behalf of Story Homes and responds to the Matters, Issues and Questions released by the Inspectors on 30th March 2021. In this submission Story Homes are responding to **Matter 4, Issue 4, Questions 32, 33, 34, 35 and 36**
- 1.2 The involvement of Story Homes in the St Helens Local Plan Examination relates to the continued promotion of the Land south of A580 between Houghtons Lane and Crantock Grove, Windle, Ref 8HS (hereafter referred to as 'Site 8HS'). Story Homes has promoted Site 8HS for the residential development of around 1,100 dwellings and has been undertaken following an agreement with the landowners.
- 1.3 Site 8HS is currently located within the Green Belt and has been identified as a Safeguarded Site within the Submission Draft St Helens Local Plan 2020 -2035, to be reserved for future residential development until after the plan period, unless a subsequent Local Plan Review proposes to allocate the land for development. In safeguarding Site 8HS, the Council has recognised that Site 8HS represents a suitable and sustainable location for housing and Story Homes welcome and support this recognition.
- 1.4 In the 2016 Preferred Options Draft of the Local Plan however, Site 8HS was identified as a Housing Allocation to come forward within the current Plan Period. This further confirms the Council's acceptance that Site 8HS, as a matter of principle, is a suitable location in which to locate this scale of new housing.
- 1.5 The Council has therefore acknowledged the acceptability of Site 8HS for residential development at every stage of the plan-making process.
- 1.6 This Hearing Statement should be read in conjunction with all the statements being submitted by Story Homes in response to **Matters 1, 2, 3, 5, 7, 10 and 11.**
- 1.7 We trust that this Statement assists the Inspectors in respect of the Examination.

2 Matter 4. Allocations, Safeguarded Land and Green Belt Boundaries Bold, Eccleston, Sutton Manor, Thatto Heath and St Helens Core Area

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)

Question 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?

Does the Green Belt Assessment support the safeguarding of Site 8HS?

- 2.1 The Green Belt Assessment (GBA) of 2018 found that Site 8HS made a 'low contribution' to the Green Belt. The GBA finds that the release of the Site for development would not harm the overall function or integrity of the Green Belt in St. Helens. As such it is clear that the GBA supports the safeguarding of Site 8HS for development as a minimum.
- 2.2 It is submitted here and elsewhere within the Story Homes responses to Matters 1,2, 3 and 5 that there is an over-whelming case to allocate Site 8HS for development in this Plan Period under Policy LPA05. Should the Inspectors however, be minded not to identify the Site for allocation Story Homes submit that the identification of the Site as safeguarded land would be wholly appropriate and indeed essential to ensure the LP Strategy is to be found justified and sound.

Have exceptional circumstances been demonstrated?

- 2.3 Paragraph 136 of the National Planning Policy Framework sets out that that Green Belt boundaries should only be altered through the preparation or updating of plans and only if exceptional circumstances exist. St Helens are proposing to release Green Belt through the preparation and adoption of a new Local Plan. This is line with the requirements of paragraph 136 of the NPPF.
- 2.4 Story Homes support the approach and timing of the review of Green Belt boundaries in St Helens and support how that piece of work has informed the preparation of the Local Plan.

- 2.5 Paragraph 137 of the Framework sets out that “*before concluding that exceptional circumstances exist to justify changes to green belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined all other options for meeting its need for development*”.
- 2.6 ‘Exceptional circumstances’ as a concept are undefined in the NPPF, a deliberate decision by the Ministry of Housing, Communities and Local Government. Helpfully though it has been established in case law (Ref: Neutral Citation Number: [2015] EWHC 1078 (Admin)) that exceptional circumstances should prove that the **identified housing need** cannot be met by the available **housing land supply** within the Plan boundary over the Plan period. The LPA must also demonstrate that the **duty to cooperate** with neighbouring local authorities has been undertaken and that any cross-boundary matters are addressed where appropriate to meet development needs in full, in line with the guidance contained within PPG.
- 2.7 Considering first the matter of **housing need** in St Helens. The LPA propose in the LP that there is a housing need of 486 dpa for St Helens over the plan period. This is a 12% uplift on the Standard Method Figure of 434 dpa and Story Homes have set out in their response to Matter 2 that the LPA should be pursuing a higher housing need figure. Story Homes consider that the Core Strategy figure, considered in the context of recent delivery rates, represents an appropriate and attainable housing need figure, i.e. 570 dpa. This is a 31% uplift on the Standard Method, which is justified by the rightly ambitious economic strategies being endorsed by St Helens, such as the successful £25m Town Deal and the strategic partnership with English Cities Fund. National PPG (Paragraph 010, Housing and economic needs assessment) allows for increases to the minimum Standard Method to facilitate deliverable economic growth strategies, the type of which are in place in St Helens and at the Merseyside level.
- 2.8 In respect of housing land supply, the LP evidence base (Doc SHBC SHBC007 - Updated Employment and Housing Land Supply Information Document) concludes that there is not enough deliverable and developable housing land on non-Green Belt sites in the Borough to meet housing needs during the plan period. Whilst Story Homes agree with the LPA that there is a shortfall in housing land supply, meaning that an amendment to Green Belt boundaries is necessary to accommodate housing needs, Story Homes have presented clear evidence following a detailed analysis of all the housing supply sites (Please refer to our Matter 5 Hearing Statement) that a discount of 866 dwellings should be applied to the available supply as there is no prospect that these dwellings will come forward within the plan period. This discount combined with the appropriate 31% uplift to the housing requirement equating to 570 dpa results in a

need to identify additional sites within the Green Belt to accommodate at least 2,846 dwellings. Additional land would then need to be identified to ensure that Green Belt boundaries can endure beyond the plan period (as required by paragraph 136 of the NPPF), including the identification of safeguarded land.

- 2.9 Considering next the **duty to cooperate**, St Helens have worked with neighbouring Local Authorities to clarify whether they are able to accommodate any of St Helens housing needs. The conclusion reached was that none of the neighbouring authorities are capable of taking on any of the St Helens requirement and so a review of Green Belt boundaries is justified if the LP is to be considered sound
- 2.10 To conclude, on the basis of the housing need and supply position in St Helens and the duty to cooperate, Story Homes agree that exceptional circumstances have been demonstrated that necessitate the alteration of Green Belt boundaries. However, the extent of land that has then been identified for release is considered insufficient to meet St Helens' housing needs in full during the plan period. Additional land to accommodate a minimum of 2,846 dwellings therefore needs to be released from the Green Belt to meet housing needs in full.
- 2.11 With reference to the appended Infrastructure Delivery Statement, it has been demonstrated that Site 8HShas capacity to deliver 1,100 homes and should be allocated to meet this additional need or as a minimum continue to be identified as safeguarded land. The Site is capable of delivering 390 dwellings during the period 2022/23 to 2026/27, 420 dwellings during 2027/28 to 2030/31 and 290 dwellings during 2031/32 to 2034/35.

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

- 2.12 Story Homes agree that the exceptional circumstances affecting St Helens are clearly articulated in the LP.
- 2.13 In terms of housing need (and linked to the duty to cooperate), the LP confirms at para 4.6.2 that "*No spare site capacity has been identified in any neighbouring local authority areas to accommodate any of the housing needs arising in the Borough*". Para 4.6.7 then explains that St Helens "*has a substantial need for new housing development that is linked to demographic needs and the need to provide sufficient housing to support employment growth*".

- 2.14 In terms of housing land supply the LP explains at Para 4.6.7 *‘that every update of the St. Helens Strategic Housing Land Availability Assessment (SHLAA) since 2010 has found that there is inadequate land in the urban areas to meet housing needs in the longer term’*.
- 2.15 In terms of the duty to cooperate, the LP explains at Para 1.7.2 that *‘in accordance with the ‘duty to cooperate’ the Council has worked closely these other Councils (Liverpool City Region) and other public bodies in addressing key strategic planning issues such as housing, the economy, infrastructure and strategic environmental assets....The results of this cooperation have underpinned the approach to key issues in this Plan’*.
- 2.16 There is no doubt that exceptional circumstances exist and these are clearly demonstrated within the LP and the associated evidence base.

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

- 2.17 Paragraph 139 of the NPPF states that identifying areas of safeguarded land would assist with ensuring that the Green Belt boundaries proposed endure beyond the existing plan period. With this in mind, given the significant concerns Story Homes has in respect of the existing claimed sources of housing land supply, the identification of additional areas of safeguarded land is essential.
- 2.18 The principle of the configuration and scale of safeguarded land that has been identified is therefore supported by Story Homes as a matter of principle, however a dispute arises in that some of the land currently identified as safeguarded land (specifically Site 8HS) should be identified as a Housing Allocation during the plan period in order to meet market and affordable housing needs in full, as set out in the remainder of this and our other Hearing Statements. This would then result in the need to identify more safeguarded land.
- 2.19 The Council’s Green Belt Review identifies that Site 8HS makes only a ‘low contribution’ to the purposes of including land in the Green Belt. This is because development of the Site will not result in the merging of any neighbouring towns or adjacent communities, and because it has an urban fringe character as a result of being surrounded by physical urban features making it ‘well contained’ and heavily influenced by

the existing urban area. The Site would represent a logical rounding off of the urban area, with the A580 forming a defensible Green Belt boundary.

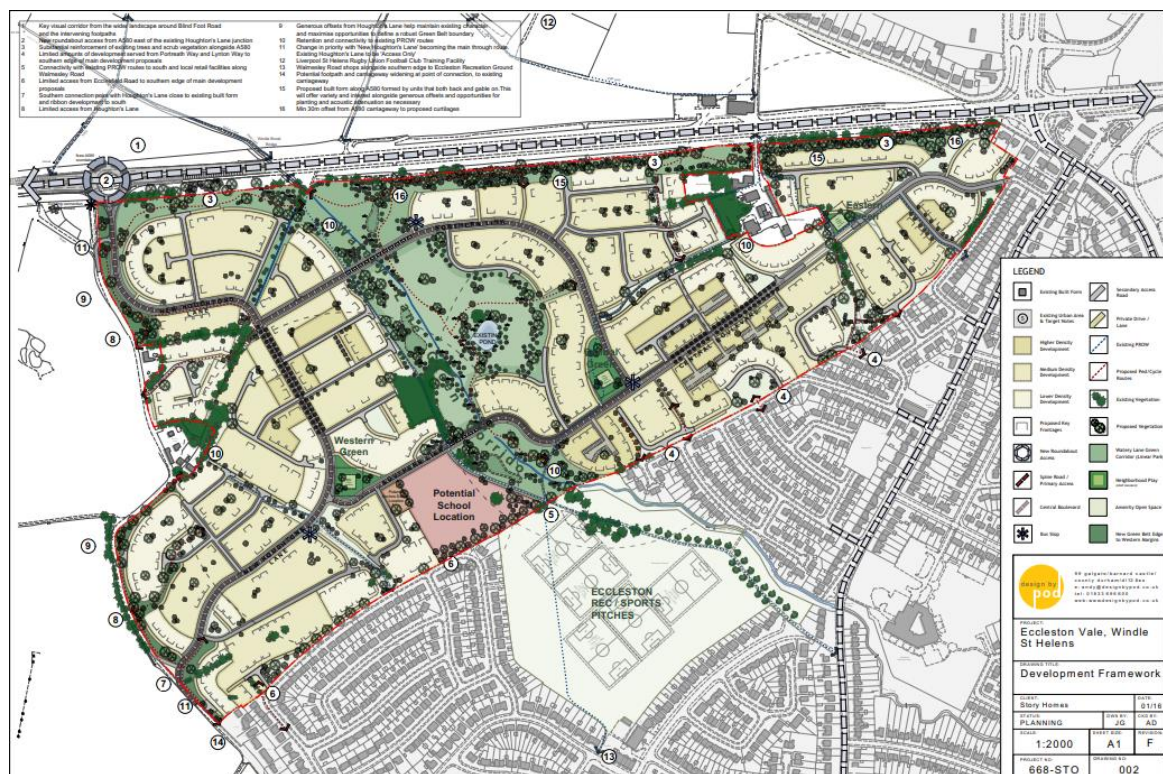
- 2.20 As set out in our Matter 3 hearing Statement, it is also recommended that given the wider concerns over the deliverability and viability of sites identified by the Council in the urban area, that Policy LPA06 includes a policy containing a formal 'trigger' mechanism for considering the release of Safeguarded Sites in the event the allocated sites and SHLAA sites do not come forward as anticipated. Suitable sites should be identified now as 'Plan B' sites should these circumstances arise. This approach was endorsed by the Inspector conducting the Examination into the West Lancashire Local Plan and Policy RS6 sets out the triggers that apply for 'Plan B' sites to be considered, which are related to housing delivery performance considered against the housing target.

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

- 2.21 Story Homes consider that the LP has not identified sufficient land for release from the Green Belt to meet housing needs in full during the plan period. There is uncertainty that sites within the existing urban area will deliver as anticipated and Story Homes conclude that additional Green Belt land (including Site 8HS) should be identified as Housing Allocations to ensure a sound strategy is adopted, alongside additional land that should be safeguarded to meet needs well beyond the plan period. Sites capable of accommodating a minimum of 2,846 dwellings need to be identified.
- 2.22 Site 8HS should be allocated as it can contribute to meeting housing needs early on in the Plan period, as confirmed within the phasing trajectory included within the appended Infrastructure Delivery Statement. The site is under the control of one developer, Story Homes, and is not subject to any major barriers to development or delivery. The site represents a desirable location for future residential development without any significant constraints. The following technical evidence showing the suitability of the site for early allocation has been provided to the Council from Story Homes through previous representations. This technical documentation has also been made available to the Council outside of formal consultations:
- Preliminary Ecological Appraisal (Urban Green, July 2016), provided at Appendix 4 to the Story Homes Submission Draft representation;

- Infrastructure and Delivery Statement (Turley, January 2018), provided at Appendix 3 to the Story Homes Submission Draft representation;
- Highways and Access Appraisal (Vectos, July 2016), appended to the Infrastructure and Delivery Statement;
- Noise Assessment (RS Acoustic Engineering Ltd, July 2016), appended to the Infrastructure and Delivery Statement;
- Landscape Appraisal (Pegasus), incorporated into the Vision Brochure provided at Appendix 2 to the Story Homes Submission Draft representation;
- Agricultural Land Classification (Soil Environmental Services Ltd, April 2019)
- Ecological Advisory Notes (Urban Green, March 2019), includes HRA Screening, Wintering Bird Survey and identification of recommended surveys
- Illustrative Masterplan (Design by Pod), provided at Appendix 1 to the Story Homes Submission Draft representation, which pulls together the findings of the various technical assessments that have been undertaken, along with site opportunities and constraints. The masterplan is provided at Figure 1 for ease of reference:

Figure 1: Illustrative Masterplan for Site 8HS (Design by Pod)



- 2.23 The LPA have not considered this detailed technical evidence submitted by Story Homes, which clearly demonstrates that Site 8HS is a more suitable option than other sites that have been identified as Housing Allocations and that it can be sustainably delivered to meet housing needs early in the lifetime of the LP. The Addendum to the Sustainability Appraisal (Doc: SD005.4) confirms that technical evidence submitted by site promoters has not been taken into consideration when carrying out the SA. This in turn has influenced the site selection process when allocating sites, which is a serious flaw in the methodology used to allocate or safeguard sites (please refer to the Story Homes Matter 1 Hearing Statement for further detail in this respect).
- 2.24 The Draft Sustainability Appraisal, and subsequent Addendum to the Sustainability Appraisal, recognise that Site 8HS is appropriate for removal from the Green Belt and as such is identified as Safeguarded Land. However, the Council have failed to take into account the sustainability mitigation measures that would be delivered as an integral part of the development of Site 8HS. These mitigation measures demonstrate that Site 8HS is in fact a more sustainable development option than 10 of the other 13 Green Belt sites assessed.
- 2.25 The view of Story Homes is that the Sustainability Appraisal methodology and extent of the evidence considered is flawed. This calls into question the decision-making process that has been undertaken when deciding which sites should be allocated, safeguarded or remain as Green Belt.
- 2.26 In light of the above, it is submitted that if undertaken correctly the Sustainability Appraisal process would assist in identifying Site 8HS as a Housing Allocation to meet housing needs over this Plan Period, and the Council's justification for not identifying it as an Allocation is not considered to be a robust outcome.
- 2.27 It is submitted that there is an over-whelming case to allocate Site 8HS for development in this Plan Period under LPA05. Should the Inspectors however be minded not to identify the Site for allocation, Story Homes submit that the identification of the Site as safeguarded land would be wholly appropriate and indeed essential to ensure the LP Strategy is to be found justified and sound. The need to identify sufficient safeguarded land is vital given the significant gap that exists between housing need and supply (2,846 dwellings) as identified within our Matter 5 Hearing Statement.

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

- 2.28 Story Homes agree that the requirements within Appendix 7 (site profile) are necessary, positively prepared and effective. The requirements would be delivered through the development of the Site. We also note that the St Helens Local Plan Draft Schedule of Modifications (Doc Ref: SHBC010) has updated the site specific requirements and so the changes have been accounted for in Table 1 below.
- 2.29 To assist in the consideration of Site 8HS as a Housing Allocation, Story Homes have prepared an Infrastructure Delivery Statement, updated in May 2021 (please refer to Appendix A of this Hearing Statement), which addresses the requirements set out at Appendix 7 in more detail. The Infrastructure Delivery Statement dated January 2018 submitted by Story Homes at the Submission Draft stage also contains the technical assessment work as appendices. This should provide the inspectors and Council with further comfort and confidence that the housing and infrastructure delivery proposed at the Site is achievable. Story Homes are committed to working closely with the Council and local community and will take all necessary steps to ensure that a robust and comprehensive planning application is submitted for the future development of the Site in the manner intended. An 18 month lead-in time is then allowed for initial ground works and infrastructure delivery, with first completions anticipated during 2022/23.
- 2.30 The requirements of Appendix 7 are set out in Table 1 overleaf, with a summary of the Story Homes response that has been informed by the Infrastructure Delivery Statement, May 2021. The illustrative masterplan for the future development of the Site, which has been informed by the series of technical assessments is provided as an Appendix to the Infrastructure Delivery Statement.

Table 1: Confirmation that the requirements of Local Plan Appendix 7 in respect of Site 8HS will be met

Local Plan, Appendix 7 Requirements for Site 8HS	Story Homes Response, summarised from the Infrastructure Delivery Statement, May 2021
Appropriate access should be provided to the A580 at Houghtons Lane Junction (or suitable alternative) to link into a new primary access road. Pedestrian and cycle links should be provided through to adjacent roads with a suitable internal road network.	The Houghtons Lane / A580 junction will be upgraded to provide a new primary access to the Site. This could be in the form of a roundabout or T-Junction and Story Homes will welcome the opportunity to discuss which the Local Highway Authority would prefer. Development of Site 8HS will significantly enhance opportunities for walking and cycling. Footpath and

	<p>cycleway routes will be provided throughout the Site's extensive green infrastructure network</p> <p>Detailed walking and cycling routes are incorporated into the illustrative masterplan for Site 8HS, which is appended to the Infrastructure and Delivery Statement.</p>
<p>The design and layout should mitigate and minimise impacts on the existing road network, including cul-de-sacs adjoining the site and the junction of Rainford Road / Bleak Hill Road.</p>	<p>The site will deliver substantial improvements to the capacity of the local highway network, providing a new gateway entrance to the town from the Borough's key strategic transport route. A bus gate to minimise the impact on Bleak Hill Road is an option under consideration with Merseytravel as part of the conversations which are looking to enhance the bus service in the area, which will help with the modal shift towards sustainable methods of transport.</p>
<p>Haughtons Lane should be diverted and upgraded.</p>	<p>Houghton's Lane will be re-aligned and upgraded, in line with the requirements of Draft Policy HA16. The resulting road referred to as "New Houghton's Lane" will create a wider and smoother highway route to the A580, thereby assisting with traffic flows and minimising congestion.</p>
<p>The developer will ensure that the design and layout makes suitable provision for a bus access to the primary access road.</p>	<p>Story Homes has held discussions with Merseytravel to enhance the bus service offer in the local area and at the Site. The proposed bus strategy is outlined in a briefing note provided by Vectos, which has been previously submitted to the Council. Discussions are on-going but it is currently proposed that the Arriva 37 St Helens-Eccleston Circular service, which currently passes within 300m of the Site, will be extended to serve Eccleston Vale. Merseytravel has confirmed that this is a viable option for enabling the diversion of public transport through the Site.</p>
<p>Financial contributions or the provision of on site infrastructure for education and off site highways works may be required this will be subject to further assessment at the masterplanning stage.</p> <p><i>*It is noted that this requirement has been removed by the Council in the latest schedule of modifications (as included within Document SHBC 010), however we have provided a response on this requirement to demonstrate the key infrastructure that is to be delivered as an integral part of the scheme.</i></p>	<p>The illustrative masterplan includes an area of land of approximately 1.6ha, which would be sufficient to facilitate the delivery of a 1.5-form entry primary school, accessible to the new and existing community</p> <p>A financial contribution to facilitate the construction of the primary school would be provided to SHMBC.</p> <p>In terms of secondary school place provision, Story Homes would contribute towards the provision of the necessary places and the local education authority would then determine the most appropriate means and location of provision.</p> <p>Site 8HS is of a size to bring the 'critical mass' of housing development required to enable new infrastructure to be embedded within the development itself and to facilitate contributions to off-site infrastructure, such as the local highway</p>

	network improvements and local recreational and educational facilities
<p>The developer should liaise with the Lead Local Flood Authority in the design of a suitable and ecologically friendly flood management for Windle Brook. The development should incorporate measure so 'slow the flow' to reduce the risk of flooding downstream and enhance biodiversity</p>	<p>With reference to the illustrative masterplan, the proposed development excludes development from around Windle Brook, with the land being used to create 'Watery Lane Green Corridor', a substantial landscaped park of 7.12 ha which forms part of the green and blue infrastructure network which will run throughout the Site.</p> <p>The area will be managed to protect and enhance biodiversity, whilst providing a natural recreational and educational resource for the local community</p> <p>The illustrative masterplan for the Site includes the introduction of a Sustainable Urban Drainage System. This will serve both to manage the surface water at the Site, with the potential to alleviate the pressure on the wider drainage network in the local area. Story Homes commits to reducing the rate of surface water run-off from the Site.</p>
<p>Measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes, which should also link to areas of employment, education, health and other services in the surrounding area.</p>	<p>As demonstrated in the illustrative masterplan, a series of walking and cycling routes are to be incorporated throughout the development, including within the areas of green infrastructure, which will provide permeability and connections to local facilities and services in all directions. As confirmed above, there are also to be expanded public transport services, including the provision of a bus route through the Site.</p>

2.31 Our response therefore demonstrates that the requirements for Site 8HS as set out within Appendix 7 have been fully considered by Story Homes in relation to the future development of the Site and this is reflected in the illustrative masterplan and Infrastructure Delivery Statement. These requirements can therefore be considered achievable, and Story Homes consider that they are necessary, positively prepared and effective.

Appendix A

Infrastructure Delivery Statement, Land South of the A580, Windle
Prepared by Story Homes Strategic Land (May 2021)



**Infrastructure Delivery Statement
Land South of the A580, Windle**

Story Homes Strategic Land

May 2021

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APPENDICES

Appendix 1	Indicative Proposed Masterplan
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1. Introduction

This Statement has been prepared by Story Homes to provide information on infrastructure delivery in support of the emerging Safeguarded site in the St Helens Metropolitan Borough Council (SHMBC) Local Plan referred to as Land South of the A580, Windle (Site reference 8HS). Land South of the A580, Windle (“the site”) is located to the north-west of St Helens centre.

Background and Purpose

Land South of the A580 is identified as Safeguarded land within the Submission version of the St Helens Local Plan 2020-35 (“the Local Plan”). The site is referred to as Land to the South of the A580 between Houghtons Lane and Crantock Grove, Windle site reference 8HS within Local Plan policy LPA06: Safeguarded Land. Story Homes have consistently provided representations at each stage of the Plan-making process, most recently to the Submission Version Consultation held in March 2019. These representations included comments on the overarching content of the Submission version Local Plan, a site-specific representation for Land South of the A580 and a Consortium representation prepared by Nexus Planning regarding housing needs and supply.

As the willing developer of the Site, Story believes that it represents a unique opportunity to create a high quality and well-connected neighbourhood at a key gateway entrance into St Helens. It will provide attractive and well-built family homes as part of a sustainable natural environment, integrated with new green and blue infrastructure and well connected to key destinations throughout Merseyside and beyond. It will help St Helens to meet its growing housing needs and play a crucial role in achieving a step change in economic performance which SHMBC aspires to deliver, whilst raising the quality of the Borough’s built environment.

Story is keen to work collaboratively with SHMBC and other stakeholders to facilitate its delivery. In this context, this Statement provides information regarding:

- The infrastructure that may be required alongside the new homes, including in respect of highways, public transport and social infrastructure; and
- The deliverability of Eccleston Vale, including the proposed and indicative approach to its delivery.

This Statement is prepared to demonstrate that the proposed development is sound and deliverable. Story Homes intends to submit this updated document as part of the Matter Statements in the upcoming St Helens Local Plan Examination in order to provide clear evidence of the site’s capabilities and delivery. Story Homes will continue to work collaboratively with St Helens Metropolitan Borough Council and trusts the information found within this IDS is of use.

2. Strategic Context

St Helens is one of the best placed Borough's in the North West. It is strategically placed at the midway point between Liverpool and Manchester – the two biggest economies in the region – and is well-connected to both by the A580 East Lancashire Road. St Helens is therefore ideally placed to achieve a step-change in economic growth which can continue its programme of urban regeneration, reduce deprivation and unemployment, and ensure that the Borough is an attractive place to live, work and invest in.

The emerging Local Plan is the strategic development plan which can enable St Helens to facilitate growth and deliver its full economic potential. It is critical to implementing and grasping the opportunities presented by Liverpool City Region Growth Strategy and Strategic Economic Plan, as well as planned investments elsewhere within the North West. In this context, the LPPO seeks to establish an aspirational but realistic and achievable plan for growth which can transform the fortunes of the Borough's communities, including by:

- Reducing socio-economic inequality and deprivation, and developing stronger, healthier and safer communities;
- Enhancing the quality of the built environment; and
- Delivering new sustainable communities which provide for all types and tenures of quality homes.

Whilst a proportion of St Helens' development needs can be met on brownfield land, there is simply not enough of it to meet the Borough's full housing and employment needs. In addition to this, a large percentage (over 60%) of the Council's housing needs are to be met in town centre or inner-urban sites where minimum density standards will apply. Whilst this approach does align with the standards set within the NPPF, crucially it will not meet the full housing needs of the Borough.

For example, sites within the inner-urban core will be subject to minimum density standards making it difficult to achieve a range and mix of dwellings which responds to the Borough's housing needs including in terms of adaptable and accessible homes. A large portion of residential allocations are located within Brownfield land, there are notable risks to viability on schemes of this nature which may mean social and environmental infrastructure is lost.

A more even distribution of housing is therefore needed across the Borough, to account for a variety of house sizes and tenures and make sure that all market and affordable housing needs are met in full. Story Homes welcome and strongly support the Council's acknowledgement that not all of the Borough's future housing needs can be met within the existing urban areas and that exceptional circumstances exist, in line with paragraph 136 of the NPPF, to justify the release of Green Belt land within the plan period. Paragraph 136 is clear that Green Belt boundaries should only be altered through the preparation or updating of Local Plans.

Story Homes consider that the LP has not identified sufficient land for release from the Green Belt to meet housing needs. There is uncertainty that sites within the existing urban area will deliver as anticipated and as such the Council will need to identify additional sources of land through a Local Plan Review if the current status is maintained. Story Homes conclude that additional Green Belt land (including Site 8HS) should be identified as Housing Allocations to ensure a sound strategy is adopted, alongside additional land that should be safeguarded to meet needs well beyond the plan period.

3. The Opportunity at Land South of the A580

Land south of the A580 is ideally suited to the development of a high quality sustainable urban extension. The Site will be familiar to SHMBC and has been discussed in earlier representations provided by Story Homes. In particular:

- **It has direct access to the Borough's key strategic transport corridor.** The A580 East Lancashire Road is St Helens major transport route, providing connections into key economic centres including Liverpool, Warrington and Manchester. Facilitating the delivery of new developments which can quickly and easily access this transport route must be a priority for SHMBC. The A580 forms the northern boundary of the Site. The site will be accessed via a new junction on this road, which will provide it with direct access to this critical transport corridor. It will also provide a new Gateway entrance to St Helens and ease the pressure on Windle Island, whilst the A580 is located in close proximity to the east which provides direct access to St Helens town centre. The site is therefore ideally situated to capitalise upon the excellent road links of St Helens, without exacerbating congestion on local roads.
- **It is in a sustainable location.** The Site is located in close proximity to a range of services and facilities which can be used by local residents on a day-to-day basis. For example, a library, post office, nursery, pharmacy and other shops and services (including food stores) are all located within 1,000m of the Site, with the designated Eccleston local centre within 400m. It is therefore ideally placed to promote sustainable modes of travel and to integrate successfully with the existing community.
- **It is one of the best sites in the Borough for Green Belt release.** SHMBC's own Green Belt Review¹ identifies that Land south of the A580 makes only a 'limited contribution' to the purposes of the Green Belt. This is because its development will not result in the merging of any neighbouring towns or adjacent communities, and because it has an urban fringe character as a result of being surrounded by physical urban features making it 'well contained'. The Site would represent a logical rounding off of the urban area, with the A580 forming a defensible Green Belt boundary.

Story Homes acknowledges that new and/or enhancements to existing infrastructure, such as schools and health services, will be needed to ensure that the new neighbourhood is sustainable and self-sufficient, has access to day-to-day services and facilities, and is capable of successfully integrating with the existing community. The site has the 'critical mass' to enable such infrastructure to be embedded within the development itself, as discussed in chapter 4 of this report.

Site Suitability

Story Homes has undertaken an extensive range of technical surveys and assessments to explore the attributes of the Site. These have been discussed in previous representations, including the submitted Vision Document and previous iteration of the Infrastructure Delivery Statement, and demonstrate that the Site is physically suitable for residential development. Technical surveys and assessments which have been undertaken to date include:

- Preliminary Ecological Appraisal (Urban Green, July 2016),
- Highways and Access Appraisal (Vectos, July 2016),
- Noise Assessment (RS Acoustic Engineering Ltd, July 2016),

¹ St. Helens Local Plan Draft Green Belt Review December 2018, St Helens Metropolitan Borough Council (2018)

- Landscape Appraisal (Pegasus),
- Agricultural Land Classification (Soil Environmental Services Ltd, April 2019)
- Ecological Advisory Notes (Urban Green, March 2019), includes HRA Screening, Wintering Bird Survey and identification of recommended surveys
- Illustrative Masterplan (Design by Pod), provided at Appendix 1, which pulls together the findings of the various technical assessments that have been undertaken, along with site opportunities and constraints.

The surveys which have been complete and updated over the course of the Local Plan production indicate that the site is not subject to any major barriers to development or delivery. The site represents a desirable location for future residential development without any significant constraints.

The Proposed Development

Story Homes' proposals for Land South of the A580 will be familiar to SHMBC and are illustrated in a Vision Document produced for the various Local Plan consultations. The masterplan provides a framework for the delivery of approximately 1,100 attractive, well-built and high-specification family and affordable homes with gardens, structured around a tranquil landscaped environment.

In recent months, Story Homes has continued to refine the masterplan proposals for the site to respond to the findings of ongoing technical assessment work and the comments received from key stakeholders, such as SHMBC. A revised illustrative masterplan is submitted alongside this report and is provided at Appendix 1. Key changes are as follows:

- Land is identified within Land South of the A580 for a potential school and health surgery, should the delivery of such infrastructure be necessary. Education and health provision is discussed further in chapter 4.
- A small triangle of land located east of Houghton's Lane which was previously excluded from the proposal is now included within the masterplan.
- The access proposals have been amended and the area of development proposed to be served from Crantock Grove has been significantly reduced. Transport and access matters are discussed further in chapter 4.

The above changes have reduced the anticipated dwelling yield from the site to approximately 1,100 units, compared to 1,135 which were proposed previously in the Vision Document.

The masterplan for the Site is illustrative. Story Homes therefore expects that it will continue to evolve and be improved over the coming months as detailed discussions are held over the Local Plan and this site in particular at the St Helens Local Plan Examination. The illustrative masterplan provided at Appendix 1 highlights the quality of the opportunity presented at Land south of the A580 and the contribution it can make to the place-making and health/well-being agenda, particularly in terms of:

- **The quality of new development which can be achieved.** Story Homes prides itself on its unique approach to design, referred to as the 'Story Difference': a commitment to and passion for design quality, place-making and customer experience. SHMBC can have confidence that the new homes delivered, and the quality of the neighbourhood as a whole, will enhance St Helens' built environment, creating a legacy that all involved can be proud of.

- **The contribution that it can provide to new infrastructure delivery.** Land south of the A580 has the ‘critical mass’ to enable required new infrastructure to be embedded within the development itself and to facilitate contributions to off-site infrastructure, such as the highway network and local recreational facilities. SHMBC can therefore have confidence that the new neighbourhood will be sustainable and self-sufficient.
- **The ability to deliver tangible and meaningful benefits for local communities,** including:
 - The enhancement of the Watery Lane Green Corridor as the central spine of a green infrastructure network. This will be a significant landscaped area, providing a wide linear park through the centre of the Site which acts as a focal point within the neighbourhood. It will comprise existing enhanced features such as Public Rights of Way, the pond and a woodland copse, alongside new tree planting, grasslands, public footpaths and cycle routes. The area will be managed to protect and enhance biodiversity, whilst providing a natural recreational and educational resource for the local community.
 - The enhancement and expansion of the footpath and cycleway network, with links throughout the Site, to the open countryside to the north of the Site via the existing A580 underpass, and to the existing cycleway network on the A580 East Lancashire Road and surrounding local highway network. This will ensure that the site is accessible, whilst providing new recreational opportunities for the local community.

As is seen through the commentary above, the proposals for Land to the south of the A580 echo St Helens Council’s intentions to create sustainable and well-balanced communities. The proposals set out above (and shown at Appendix 1) aim to demonstrate the significance of green and blue infrastructure within a scheme. The scheme seeks to respond to the housing needs of the Borough and provide a suitable mixture of homes, including those which are accessible and adaptable. Story Homes considers that the site is suitable and deliverable for residential development. As noted previously, additional Green Belt land (including Site 8HS) should be identified as Housing Allocations to ensure a sound strategy is adopted.

Land Ownership

The Site is currently under the control of eight separate landowners. Story Homes has a single option agreement with all eight landowners. The effect of this agreement is that the entire Site is under the control of a single housebuilder. Story Homes has a strong track record of delivering residential developments across the North West. Their involvement is therefore a key attribute which will help to ensure swift delivery of high-quality housing, particularly when compared to other proposals in the nearby area which are not currently under the control of a housebuilder or developer. Story Homes considers their entry into the Borough will also help to increase competition and differentiate the design and standard of new homes being provided. Phasing and delivery of the Site is discussed in greater detail in chapter 5.

4. Infrastructure Requirements

A major benefit of Land south of the A580 is its scale. The delivery of 1,100 new homes will provide 'critical mass' which can viably support essential infrastructure provision in a comprehensive, costed and planned way. The Site will create a sustainable and self-sufficient new neighbourhood which includes the services and facilities needed on a day-to-day basis by the new local residents and which is successfully integrated with the existing community.

Infrastructure covers not only physical provision, but also a range of facilities that support the social and economic life of an area. As such, the term "infrastructure" as used in this report refers to highways and transport facilities, education provision, health provision, and landscape and green infrastructure, including sporting/recreational facilities.

It is proposed that the delivery of new infrastructure will be phased throughout the build period and will be delivered in tandem with the new homes at the Site. As set out by the NPPF, it is clearly important that new infrastructure requirements do not compromise the viability of new development. As such, the range of new infrastructure to be provided and the timing of its delivery should only be fixed following a detailed review of both site-specific and Borough-wide infrastructure requirements and consideration of the various funding options. Careful planning may be required to identify key priorities for delivery where there are competing infrastructure requirements. As such, Story Homes intends to work with SHMBC and other stakeholders over the coming months to identify the new infrastructure requirements and an agreed approach to delivery.

As such, until the proposal has progressed to a point where a full viability appraisal can be undertaken, the infrastructure discussed in this report – including associated costs and delivery estimates outlined below and in the following chapter – is indicative only and must be treated as such. Nevertheless, it provides assurances, and a degree of comfort that extensive and detailed work has been undertaken to demonstrate that land south of the A580 is a well-developed, deliverable and sustainable proposal which can provide benefits of Borough-wide significance.

Access Arrangements and Highways

The Site is directly accessible from the A580 East Lancashire Road, the Borough's key transport corridor and a strategic link between the economic centres in Liverpool, Warrington and Greater Manchester. It therefore provides a unique opportunity to deliver a large-scale development in a highly accessible location whilst avoiding the addition of significant traffic volumes to the local highway network. Moreover, the scale of the development enables the delivery of new and enhanced highway infrastructure which will both facilitate access to the Site and expand the highway capacity of the local area, thereby providing benefits to existing road and pedestrian users.

In particular, the Site will enable the delivery of a new gateway access to St Helens via Houghton's Lane, which forms the western boundary of the Site and connects directly to the A580 at its north-west corner. The existing Houghton's Lane/A580 junction is of insufficient scale to accommodate the proposed development. It is therefore proposed that:

- The **junction itself will be upgraded** to provide a new primary access into the Site. This could either take the form of:
 - o a roundabout of similar scale and design as the Blindfoot Road roundabout on the A580 1.1km to the west; or

- A T-junction controlled with traffic lights and potentially linked to the Windle Island signalised junction 1.3km to the east.

The illustrative masterplan (see Appendix 1) is prepared on the basis of the roundabout option, but Story Homes would be comfortable with either approach and would welcome further discussions with the local highways authority to understand which might be preferred.

- **Houghton's Lane will be re-aligned and upgraded**, in line with the requirements of the LPPO (Draft Policy HA16). The resulting road referred to as "New Houghton's Lane" will create a wider and smoother highway route to the A580, thereby assisting with traffic flows and minimising congestion; the existing Houghton's Lane will be downgraded for access only to existing properties along its current route. The route of New Houghton's Lane is included within the masterplan for the Site (See Appendix 1) but is illustrative only; further work including detailed traffic modelling will be required at the planning application stage to define and fix the proposed route of the New Houghton's Lane to ensure that its operational capacity and efficiency is maximised.

The above access arrangements are considered in detail within a highway and access appraisal prepared by Vectos, which has previously been submitted to the Council throughout the Local Plan preparation.

Public Transport

The Site is in an optimal location at a gateway entrance into St Helens on the Borough's key transport route and in close proximity to existing services and facilities in the local area. Story Homes is keen to maximise the opportunity presented by the Site's location by ensuring that sustainable travel options are fully integrated into the development. This will ensure that it is both well-connected to its surroundings and is capable of facilitating a modal-shift in travel which enables a high proportion of local residents to use environmentally-friendly modes of transport.

Bus Strategy

There are numerous existing bus services in the local area, including the half hourly 37 St Helens/Eccleston service which travels to Walmesley Road and Eccleston District Centre, and the hourly 137/138 St Helens/Billinge service along Bleak Hill Road. Large areas of the Site are already within a 400m walking distance of existing bus stops.

Story Homes has held discussions with MerseyTravel to **enhance the bus service** offer in the local area and at the Site. The proposed bus strategy is outlined in a briefing note provided by Vectos, which has been previously submitted to the Council. Discussions are on-going but it is currently proposed that the Arriva 37 St Helens-Eccleston Circular service, which currently passes within 300m of the Site, will be extended to serve Eccleston Vale. MerseyTravel has confirmed that this is a viable option for enabling public transport access.

There are various options for the routing of the bus service. At present, the illustrative masterplan (see Appendix1) is based on the proposal that the Arriva 37 service will travel the length of Houghton's Lane and enter the site at the south-west corner, then using an internal circular road network to complete a loop within the Site. The bus strategy identifies that three bus stops will be provided alongside this circular loop, thereby ensuring that all dwellings fall within a 400m catchment of the bus service.

MerseyTravel has, however, identified that an east-west route across the site might be preferable to the circular loop. An east-west route could be achieved by providing an access at the eastern edge of the Site, either from Crantock Grove or from the A580 East Lancashire Road to the west of Windle Island. Both of these options could be provided as a bus-only access controlled via a bus gate in order to limit the potential for them to be used by private cars, mindful that SHMBC is keen to minimise the number of additional vehicles using Bleak Hill Road. At this stage it is clear that both the circular loop and east-west route options for the bus service are achievable. Further discussions with both MerseyTravel and SHMBC will be necessary in due course to determine the favoured option and, at the appropriate time, the feasibility of the preferred route can be further explored.

The extended bus services will be implemented at the Site early within the build period to encourage new residents to take-up and form a habit of using public transport. However, in the early years of the build period the number of occupied dwellings is unlikely to be sufficient to viably sustain the extension of the bus service. As such, Story Homes will provide funding to MerseyTravel to 'pump prime' the service. The scale of funding required will be determined at the application stage via further discussions with MerseyTravel.

Footpaths and Cycle Routes

Land South of the A580 will also significantly enhance the opportunities for walking and cycling. In particular:

- Footpath and cycleway routes will be provided throughout the Site's extensive green infrastructure network, including as part of the Watery Lane Green Corridor and the landscape framework to the north of the Site.
- Cycle crossing facilities will be provided as part of the new A580/Houghton's Lane junction, such that cyclists can safely navigate the A580.
- Footpath/cycleway connections could be provided to the open countryside to the north via the existing A580 underpass, which would itself be made secure and attractive (for example through a lighting scheme). This would improve the accessibility of the open countryside to the north of the Site.

These walking and cycling routes are incorporated into the illustrative masterplan for Land south of the A580 (see Appendix 1).

Education

The Site is located in close proximity to existing schools, with Bleak Hill Primary School located approximately less than 500m to the south. It is, however, noted that there is limited capacity within the nearby schools. Indeed, the majority of the eleven primary schools located within a 2-mile radius of the Site are operating either near or slightly over-capacity².

The delivery of approximately 1,100 new homes at the Site will increase the demand for school places in the local area. Using the pupil yield multipliers which have been supplied by SHMBC³, it is estimated that the site will generate approximately:

- **41 primary school pupils**, equivalent to slightly in excess of a 1-form entry primary school; and
- **18 secondary school pupils**, equivalent to approximately 0.5-form entry secondary school.

² Get Information about Schools, <https://www.get-information-schools.service.gov.uk>

³ SHMBC confirmed that the pupil yields used reflect its current approach but that they are subject to review.

Story Homes will work with SHMBC at the appropriate time to determine how this demand can be most appropriately accommodated, taking into account the existing supply, projected natural growth, and the timing/phasing of the delivery of the new homes. In respect of primary school places, it is acknowledged at this early stage that the shortage of capacity within nearby primary schools may necessitate the delivery of new facilities. The scale of the site enables such facilities to be appropriately planned and phased for delivery alongside the provision of the new homes. In the event that the on-site delivery of a new primary school is SHMBC's preferred approach:

- The illustrative masterplan includes an area of land of approximately 1.6ha, which would be sufficient to facilitate the delivery of a **1.5-form entry primary school** at Eccleston Vale. This land is located to the south of the Site and immediately adjacent to the internal loop road, such that it would be accessible both to the existing community to the south and from the proposed bus services. In this regard, the primary school would accommodate demand arising from the proposed development at the Site, as well as providing additional capacity for the local community. The location of the land proposed for the primary school ensures safe and secure pedestrian access can be gained to the playing pitches immediately adjacent to the south of the Site.
- A financial contribution to facilitate the construction of the primary school would be provided to SHMBC.

In respect of secondary provision, it is noted that the two secondary schools closest to the Site are currently operating near to or slightly over-capacity, again indicating that additional capacity may be required. If this is the case, it is highly unlikely that a new secondary school would be required given that such establishments typically range in size from 6- to 10-form entry schools. Story Homes would, however, contribute towards the provision of the necessary places and the local education authority would then determine the most appropriate means and location of provision.

The precise timing of delivery of the necessary school places will be the subject of discussions with the local education authority at the planning application stage. However, as with any major development, it would be necessary to accumulate sufficient "critical mass" to underpin the viable operation of a new primary school, such that its delivery would be unlikely to occur very early within the build period.

Health

The Site is located in close proximity to existing health services, with the Eccleston Medical Centre being located approximately 1,000m to the south. However, SHMBC has advised that there is a shortage of capacity within this facility, such that it is not of sufficient scale to accommodate the demands of the existing local community or those arising from new development in the area. It is also noted that the Medical Centre is due to be re-located to a new facility at Millfield's, approximately 500m further to the south. The local area is therefore somewhat under-served by the existing health services.

The provision of 1,100 dwellings at Land South of the A580 could accommodate an estimated 2,415 additional residents, based on the average household size in St Helens at the 2011 Census. Using the national benchmark of 1,800 patients per GP, the scale of the population increase associated with proposed development is likely to generate demand equivalent to between **one and two additional GPs**. Similarly, demand is likely to be generated for between **one and two additional dental practitioners**, based on the national benchmark of 1,400 patients per dentist.

Given the above, additional built facilities may be required to accommodate additional health practitioners which may be needed to meet the demand arising from the proposed development. Story Homes will work with SHMBC to establish the actual need for additional health practitioners at the point at which the new homes are delivered, taking into account existing supply and surplus capacity within existing practices at the appropriate time. In the event that additional built facilities are required, discussions will be held with the Clinical Commissioning Group (CCG) to determine whether those facilities are provided in the form of:

- An expansion to an existing medical centre in the local area; or
- The provision of a new medical centre at or in close proximity to the Site.

In the event that the latter is the CCG's preferred approach, the precise scale of the facility to be provided would be determined in discussions with both SHMBC and the CCG. However, it is considered that a building of **up to 600sqm** would be sufficient to provide the required consulting and treatment rooms, administrative/office space, and public waiting area, with the potential to incorporate a pharmacy if required⁸. To facilitate the delivery of this facility:

- The masterplan for Land South of the A580 includes an area of land approximately **0.12ha** in size, such that it could be accommodated on Site. This land is located to the south of the Site and immediately adjacent to the internal loop road, such that it would be accessible both to the existing community to the south and from the proposed bus services (see Appendix 1).
- A financial contribution would be made to CCG in respect of its construction.

Green Infrastructure

SHMBC has identified local standards for open space provision in the LPPO. An initial assessment of these standards indicates that the site would trigger a requirement for **up to 3.1ha of on-site open space** will be required to meet SHMBC's open space standards, with **up to 7.1ha of off-site open space** in the form of parks, gardens, natural and semi-natural also being necessary. See figure 1 below for the full break-down.

Open Space Typology	St Helens Accessibility Standard (time/distance)	St Helens Standard per 1,000 population (ha)	Requirement (ha)
Parks and gardens	15 min walk (1.2km)	0.8	2.0
Natural and semi-natural open space	15 min walk (1.2km)	2	5.1
Total off-site open space		2.8	Up to 7.1
Amenity green space	5 min walk (400m)	1	2.6
Provision for children and young people	10 min walk (800m)	0.1	0.26
Allotments	15 min walk (1.2km)	0.1	0.26
Total on-site open space		1.2	Up to 3.1

Figure 1 Source: Table 7.1 St. Helens Local Plan 2020-2035 Submission Version

Story Homes will work with SHMBC to establish the most appropriate means and location for on-site and off-site open space provision to meet this demand, taking account of existing resources within the vicinity of the Site. Land South of the A580 will facilitate strategic enhancements to the green infrastructure offer of the local area. In particular:

- The **Watery Lane Green Corridor** will comprise a substantial landscaped park which forms part of the green and blue infrastructure network which will run throughout the Site. This area is included within the masterplan for the Site and is approximately 7.12ha in size. This would comprise a mix of amenity greenspace and semi-natural/natural greenspace. The proposals for this area are discussed in the Vision Document for Eccleston Vale, previously submitted to the Council.
- Areas of **children's play space and amenity open space** can be located throughout the site in close proximity to the new homes; and
- Upgrades to the **sports facilities at Eccleston Field** north of Broadway, such as through the provision of all-weather pitches. This would significantly enhance the "playability" of the field and the scale of sports use which it can accommodate and could be made available for use by both the community and nearby schools.

There is therefore scope within the site to meet, and indeed significantly exceed, SHMBC's open space requirements. The green infrastructure proposals for the development would provide strategic enhancements to the recreational offer of the local area which would offer substantial benefits to the existing local community, contributing to the place-making and health/well-being agenda in the Borough.

Noise

The A580 East Lancashire Road is located immediately adjacent to the northern boundary of the Site. An assessment has been undertaken by noise specialists RS Acoustic Engineering Ltd to assess the potential impacts at the Site from traffic on the A580 (previously submitted to the Council). It has established the prevailing acoustic environment at the Site during the daytime and night-time periods and offered guidance on how the new development can interact with the A580. The masterplan proposals take account of this guidance and include:

- A "**buffer zone**" of 30-40m between the A580 and the new homes. This area would be landscaped, including new tree planting and public footpaths, providing an attractive "green" edge which can also be used for recreation.
- An **acoustic fence** within the "buffer zone"; and
- **Sound insulation solutions** for the properties closest to the A580, such as trickle ventilator units or the installation of mechanical ventilation systems (such as PIV⁴ or MVHR⁵).

Alternative design approaches – such as fronting new homes onto the A580 (north of Newlands Road and at Wycliffe Road) – can also be explored. However, the current masterplan for Land south of the A580 is prepared on the basis of the above approach. It will ensure that all new homes at the Site have an appropriate level of amenity and a high quality of life.

Drainage

⁴ Positive Input Ventilation

⁵ Continuous mechanical supply and extract with heat recovery

Windle Brook runs north-south through the central section of the Site. An area of land adjacent to the brook is defined as being Flood Zones 2 and 3⁶, with a higher probability of flooding. This area represents only a small part of the Site and does not present a constraint to the development of the wider Site, the vast majority of which is defined as Flood Zone 1 such that it is at the lowest probability of flooding. The proposed development addresses the presence of higher flood risk zones by excluding development within those areas; the land will instead be used to create the **Watery Lane Green Corridor** (see above), a substantial landscaped park which forms part of the green and blue infrastructure network which will run throughout the Site.

The illustrative masterplan for the Site includes the introduction of a Sustainable Urban Drainage System (SUDS). This will serve both to manage the surface water at the Site, with the potential to alleviate the pressure on the wider drainage network in the local area. Indeed, Story Homes commits to **reducing the rate of surface water run-off** from the Site. This will have a notable benefit for existing local residents in the area by reducing the risk of flooding within the drainage network.

Utilities

Given the urban-fringe location of the Site, there is a range of existing infrastructure located at or in close proximity to the Site. However, none of these present an insurmountable constraint to the delivery of the site. In particular:

- Within the western boundary high voltage (33,000V) electricity cables cross the Site and are proposed to be diverted. High voltage cables at the A580 would need to be diverted to enable the highway access. Scottish Power has estimated the cost of both diversions at £93,800. The Site is crossed broadly east-west by two water mains. One of the water mains is proposed to be retained in its current position with the required 10m easement, whilst the other water main is proposed to be diverted. United Utilities has confirmed that this approach is acceptable and has identified an estimated cost of £2.7m.
- Local High Pressure and Intermediate Pressure gas mains are located to the north of the Site along the A580 East Lancashire Road. These mains will not be directly affected by the proposed development, which includes a buffer zone to them which has been agreed with National Grid, the asset owner. National Grid has also confirmed that both gas mains can be diverted to facilitate the proposed improvement works to the A580 (see above).
- Telecommunications infrastructure runs along the A580 East Lancashire Road and also north-south across the Site, operated by British Telecoms (BT) and Virgin Media respectively. Both parties have confirmed that the infrastructure can be relocated and/or temporarily diverted to facilitate the delivery of Land to the South of the A580 and associated improvement works to the A580. The cost of the diversions is estimated by Virgin Media and BT to be approximately £200,000.

It is clear from the above that existing utilities infrastructure does not pose a significant obstacle to the proposed development. More information can be provided to SHMBC regarding each of the above matters should it be required.

⁶ <https://flood-map-for-planning.service.gov.uk>

5. Site Deliverability

This chapter discusses the deliverability and potential phasing of Land to the south of the A580 across the Plan Period. Story Homes highlights that this information is illustrative and will need to be refined over the coming months.

Deliverability

Story Homes is a privately owned housebuilder founded in 1987. It has a long and successful reputation of building quality and high specification homes across the North West. For over 30 years Story Homes has been the name most often associated with aspirational houses for sale throughout Cumbria, the North East and Lancashire, with a passion for quality and excellence. It has a track record in delivering new developments in a timely fashion.

Story can confirm that:

- The land at the Site is entirely under its control as a willing developer, with an existing agreement in place with the landowners (see chapter 3). The Site is not subject to any significant legal or ownership constraints, such as ransom strips or tenancies, which might present an obstacle to early delivery. The Site is therefore available for development now.
- Land to the South of the A580 is achievable and viable in the short-term. It is located within a strong market area which experiences high demand for new homes and is in very close proximity to the strategic road network, such that it can be easily accessed from key employment destinations. The Site is also largely free from any environmental or technical constraints.

Land to the South of the A580 is therefore a deliverable development opportunity which is capable of delivering new homes quickly, subject to its release and the grant of planning permission. This is particularly the case given that it is already under the control of a housebuilder with a strong track record which should provide confidence to SHMBC regarding its early delivery. As noted in Chapter 3, Story Homes involvement can help to provide confidence about delivery, diversify the housebuilder market in the Borough, and provide assurances about the quality of new homes which will be provided at the Site. Story Homes considers that the site is suitable and deliverable for residential development. As noted previously, additional Green Belt land (including Site 8HS) should be identified as Housing Allocations to ensure a sound strategy is adopted.

Delivery Trajectory

Land to the South of the A580 is located in a strong market area which is highly accessible. Story Homes therefore considers that there will be strong demand for the new homes at the Site. Story Homes will work with SHMBC and other stakeholders to deliver the site as quickly as practicable after the adoption of the emerging Local Plan. Assuming that the Local Plan is adopted towards the end of 2021, and that Land south of the A580(Site 8HS) is upgraded to a full allocation, it is anticipated that:

Subject to a successful Allocation of land South of the A580, development could commence by early 2022, with the first homes available towards the end of 2022/early 2023. This would allow an 18-month lead-in time in which to:

- Collaborate successfully with SHMBC and all statutory consultees to reach agreement on a suitable and deliverable scheme.
- Secure a hybrid planning permission comprising outline planning permission for the entire Site and detailed planning permission for the first phase of development.
- Discharge relevant pre-commencement conditions prior to the implementation of the planning permission and prepare the Site for development.

Story Homes considers that an 18-month lead-in time is realistic given the scale of due diligence which has already been undertaken in respect of the Site.

The development will be delivered within approximately 12 years. Given its size, the Site will include several build outlets which will deliver new homes at the same time. It is anticipated that three outlets can each deliver approximately 35 new homes simultaneously, such that at its peak the Site can provide at least 105 every year. This is consistent with the rates of delivery which have been achieved by other large-scale development proposals elsewhere within the North West.

A projected housing trajectory for the Site is illustrated in Figure 2 below. It assumes that each phase will deliver 35 dwellings per annum.

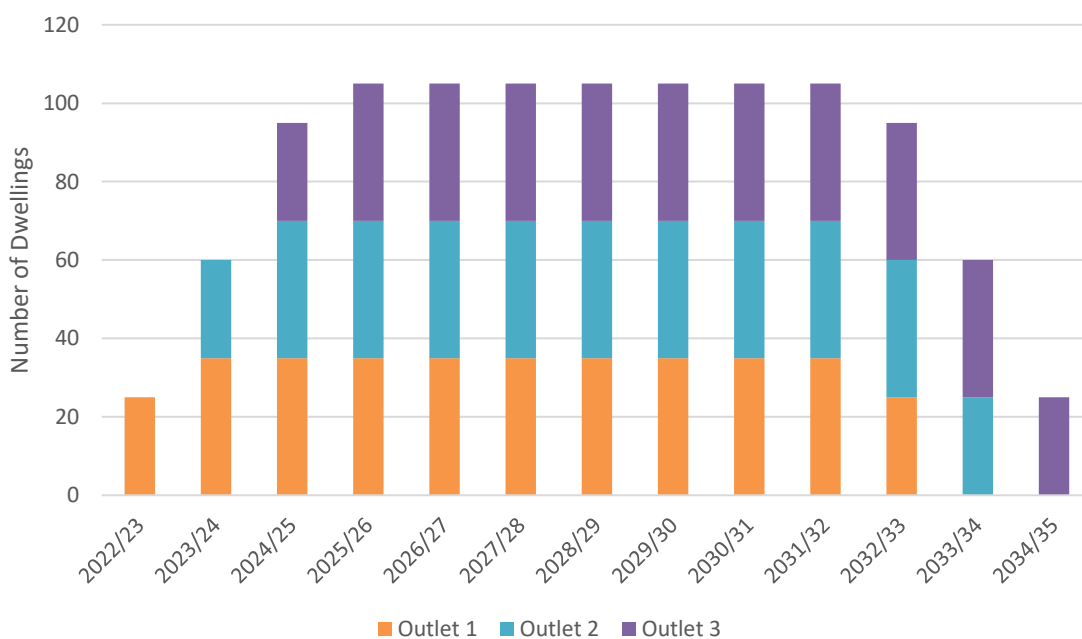


Figure 2: Estimated Delivery Trajectory for Land South of the A580

The trajectory reflects that there are no legal or ownership constraints to the delivery of the site and that Story Homes' intention is to commence the delivery of the Site as soon as possible. In respect of the latter, Story Homes remains committed to work with SHMBC to establish an agreed and deliverable masterplan.

Infrastructure Phasing

As discussed in the preceding chapter, the site will provide a range of new and expanded infrastructure to ensure that the new neighbourhood is as sustainable and self-sufficient as possible, has access to day-to-day services and facilities, and integrates successfully with the existing community. The delivery of new infrastructure will be phased throughout the build period. The precise scale, timing

and delivery of new infrastructure will be discussed and agreed with SHMBC prior to the commencement of development as part of the planning application process, mindful of matters such as development viability, infrastructure need, development phasing, SHMBC funding priorities and external funding opportunities.

However, based on the information presented in the preceding chapter, the table below identifies a high level and indicative approach to infrastructure phasing based on four to five-year build periods defined by the above development trajectory. This phasing will need to be refined with SHMBC and other stakeholders in due course and is subject to significant change. It does, however, provide a broad indication of when new infrastructure may be capable of being delivered.

Phasing period	Estimated Number of new homes delivered	Indicative infrastructure delivery
2022/23 – 2026/27	390 dwellings	A580 junction Houghton’s Lane diversion and upgrade Diverted and extended bus services SUDS, including 40% betterment
2027/28 – 2030/31	420 dwellings	A580 junction Houghton’s Lane diversion and upgrade Diverted and extended bus services SUDS, including 40% betterment
2031/32 – 2034/35	290 dwellings	Sports facilities Secondary school contribution

Story looks forward to working with SHMBC to refine the illustrative development and infrastructure phasing.

6. Conclusion

Land to the South of the A580 provides a substantial opportunity to facilitate the delivery of new and expanded infrastructure, providing meaningful and tangible benefits for the town and its residents. In particular, it could deliver:

- Substantial improvements to the capacity of the local highway network, providing a new gateway entrance to the town from the Borough's key strategic transport route.
- Significant recreational and green infrastructure resources, including the Watery Lane Green Corridor.
- Expanded public transport services, including bus services, cycle routes and footpath links to the open countryside to the north.
- New educational and health facilities, helping to alleviate issues associated with existing facilities in the local area being over-subscribed.
- New sports facilities for use by new and existing local residents.
- New affordable and market houses across all sectors of housing need from starter homes through to retirement living.

Substantial additional work is required to determine the precise scale and nature of infrastructure which the site will deliver. However, the information provided in this report about infrastructure requirements, costs and phasing provides assurances that extensive and detailed work has been undertaken to demonstrate that Land South of the A580 is a well-developed, deliverable, viable and sustainable proposal which can provide benefits of Borough-wide significance. It will facilitate the delivery of a sustainable development which has the services to meet the day-to-day needs of local residents, in a highly accessible location via both car and public transport, and on a Site which has a limited Green Belt function.

Land South of the A580 is identified as Safeguarded land within the Submission version of the St Helens Local Plan 2020-35 ("the Local Plan"). Story Homes consider that the LP has not identified sufficient land for release from the Green Belt to meet housing needs. There is uncertainty that sites within the existing urban area will deliver as anticipated and as such the Council will need to identify additional sources of land through a Local Plan Review if the current status is maintained. Story Homes conclude that additional Green Belt land (including Site 8HS) should be identified as Housing Allocations to ensure a sound strategy is adopted, alongside additional land that should be safeguarded to meet needs well beyond the plan period.

Appendix - Illustrative Masterplan



1 Key visual corridor from the wider landscape around Blind Foot Road and the intervening footpaths
 2 New roundabout access from A580 east of the existing Houghton's Lane junction
 3 Substantial reinforcement of existing trees and scrub vegetation alongside A580
 4 Limited amounts of development served from Portreath Way and Lynton Way to southern edge of main development proposals
 5 Connectivity with existing PROW routes to south and local retail facilities along Walmesley Road
 6 Limited access from Ecclesfield Road to southern edge of main development proposals
 7 Southern connection point with Houghton's Lane close to existing built form and ribbon development to south
 8 Limited access from Houghton's Lane

9 Generous offsets from Houghton's Lane help maintain existing character and maximise opportunities to define a robust Green Belt boundary
 10 Retention and connectivity to existing PROW routes
 11 Change in priority with 'New Houghton's Lane' becoming the main through route. Existing Houghton's Lane to be 'Access Only'
 12 Liverpool St Helens Rugby Union Football Club Training Facility
 13 Walmesley Road shops alongside southern edge to Eccleston Recreation Ground
 14 Potential footpath and carriageway widening at point of connection, to existing carriageway
 15 Proposed built form along A580 formed by units that both back and gable on. This will offer variety and interest alongside generous offsets and opportunities for planting and acoustic attenuation as necessary
 16 Min 30m offset from A580 carriageway to proposed curtilages

LEGEND

	Existing Built Form		Secondary Access Road
	Existing Urban Area & Target Notes		Private Drive / Lane
	Higher Density Development		Existing PROW
	Medium Density Development		Proposed Ped / Cycle Routes
	Lower Density Development		Existing Vegetation
	Proposed Key Frontages		Proposed Vegetation
	New Roundabout Access		Watery Lane Green Corridor (Linear Park)
	Spine Road / Primary Access		Neighborhood Play (LEAP standard)
	Central Boulevard		Amenity Open Space
	Bus Stop		New Green Belt Edge to Western Margins

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PROJECT:
Eccleston Vale, Windle St Helens

DRAWING TITLE:
Development Framework

CLIENT: Story Homes	DATE: 01/16
STATUS: PLANNING	DWN BY: JG
SCALE: 1:2000	CKD BY: AD
SHEET SIZE: A1	REVISION: F
PROJECT NO: 668-STO	DRAWING NO: 002

Hearing Statement on behalf of Story Homes

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