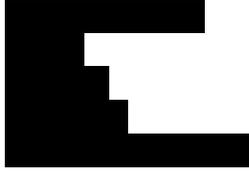


St Helens Borough Local Plan – Hearing Submission

Mr Steve Muskett



Further to my original submission from 11th March 2019, I would like to add the following comments, observations and objections given the various updates and the responses from the Council to numerous PI questions.

Matter 5 – Issue 1 – Q3&Q10

It's good to see the small sites windfall allowance increased from 93 to 103.

This goes further than the 97 I had suggested in my previous submission.

Table 4.4 in SD025 still contains a significant outlier from 2010 when the housing market was extremely depressed.

Removal of this outlier would be good practice when considering this data and take the allowance to 108.

Imagine this plan review were to be one year on, thus meaning the last 10 year data would have 2010/11 removed and 2020/21 included.

Nobody in their right mind would include data from the past year, given the pandemic, in any statistical analysis (it would be a clear outlier) and that same principal should be applied to 2010/11.

This is further supported when considering the number of sites that have come forward in the 2 years since the consultation, with planning consent now approved.

A number of these should be considered as large windfall sites and again demonstrate it was wrong and premature to dismiss a large windfall site allowance. (See **Table: Large Windfall Sites** below)

In document SHBC004, the Council responds to various questions from the PI and uses some tables to show housing numbers and trajectory.

The first of those tables shows the HA sites, as per below.

SHLAA & Local Plan Ref	Site Name	Site Capacity	Units Completed	Outstanding Capacity	Pland period total	Total post 2035	Actual
1HA (Local)	Land South of Billinge Road, East of Garswood Road and West of...	216	0	216	216	0	216
2HA (Local)	Land at Florida Farm (South of A580), Slag Lane, Blackbrook	522	0	522	382	140	382
3HA (Local)	Penlake Industrial Estate Land at Emr Recycling And Former...	337	134	203	203	0	203
4HA (Local)	Land bounded by Reginald Road/Bold Road/Travers Entry/Gc...	2,988	0	2,988	360	2628	360
5HA (Local)	Land South of Gartons Lane and former St.Theresa's Social C...	569	0	569	472	97	472
6HA (Local)	Land east of City Road, Cowley Hill	816	0	816	540	276	1100
7HA (Local)	Land West of the A49 Mill Lane and to the East of the West C...	181	0	181	181	0	181
8HA (Local)	Land South of Higher Lane and East of Rookery Lane, Rainfor...	259	0	259	259	0	259
9HA (Local)	Land north of Elton Head Road	352	0	352	352	0	352
10HA (Local)	Moss Nook Urban Village, Watery Lane	802	0	802	585	217	585
					1680		2240

The sites highlighted in green are the Green Belt sites proposed to be released.

For a long time now, Site 6HA has been ear-marked for in excess of 1000 dwellings but the Council would never update the figures as planning was not obtained.

That is no longer the case and consent has now been given for 1100 dwellings. Further than that, the developers have stated it is expected to take up to 12 years to complete and will therefore be fully delivered within the plan period.

Moss Nook (10HA) has been reported numerous times in press articles as being capable of delivering 900 dwellings; without planning consent though, I have left the figure at 802.

This means that, rather than 1680 dwellings being delivered from the Brownfield HA sites, the figure will be 2240.

The second section of the table details some 76 sites from the SHLAA.

These sites combine to provide a total of 3158 within the plan period based on the numbers provided by the Council.

However, the sites list below either have planning consent for a higher number of dwellings or at least lapsed consent for a higher number.

SHLAA & Local Plan Ref	Site Name	Site Capacity	Units Complete	Outstanding Capacity	Plan period total	Total post 2035	Actual / Potential	Reference
18	Land at Somerset Street and Sussex Grove	66	0	66	66	0	80	P/2007/0680
22	Land at corner of Fairclough Street and Wargrave Road	14	0	14	14	0	61	P/2004/0996
23	Liverpool Arms and former Sacred Heart RC Church and School, Borough Road	29	0	29	29	0	130	P/2005/1033
27	Former Bethell Mission Bowling Green, Marsden Avenue	10	0	10	10	0	16	P/2010/0638
150	Former Red Quarry, Chester Lane	57	0	57	57	0	81	P/2021/0196/FUL

These five sites combine to provide additional capacity of 192 dwellings within the plan period.

Additional to that, the following sites with planning consent and one being discussed at pre-application stage, combine to provide a further 619 dwellings.

Table: Large Windfall Sites

SITES NOT LISTED	
Emmanuel Church Elephant Lane St Helens Merseyside WA9 5EP	18 P/2019/0855/FUL
Fort Knox	20 P/2019/0225/FUL
Travellers Rest	61 P/2020/0473/OUP
Bold Miners	50 P/2020/0487/FUL
243 Leach Lane	17 P/2020/0228/FUL
Thatto Heath British Legion	30 P/2018/0848/FUL
Newton Park Drive	35 P/2019/0192/FUL
Crown Buildings	66 P/2019/0186/O2DPA
Parr Fire Station	48 P/2021/0263/FUL
Earlestown Conservative Club, on Earle Stree	16 P/2020/0792/FUL
Former Railway Hotel Railway Street Newton Le Willows St Helens WA12 9QY	15 P/2020/0772/FUL
Land Between Sutton Road Lancots Lane And Dismantled Railway Line Lancots Lane	63 P/2020/0113/FUL
Lancots Lane, Sutton	180 Pegasus Ref: GS/DM/P20-3551/R001v2

Many of those listed above could be deemed to be large windfall sites and have come to market, so to speak, in just the last couple of years.

This again demonstrates clear evidence that a large windfall site allowance should be included.

The total now from SHLAA and these unlisted sites is 3969.

Add this to the 2240 from the non-Green Belt HA sites to arrive at 6209.

Further addition of the 103 small site allowance over 15 years (1545) brings the total to 7754. When you consider that the Council's own total figure of 486 for 15 years only equates to 7290, it becomes clear that exceptional circumstances have not been demonstrated.

The Council seem to be arguing the case that 15% reduction is required for non-delivery.

When you take into account though that from their list of sites, totalling 3158 dwellings, only 4 sites are historically stalled, totalling only 168 dwellings; just 5%.

With that in mind, 15% for non-delivery appears to be an excessive amount, and is used purely to drive up the figure required to be taken from Green Belt.

The HA sites are already reduced in their capacity to allow for infrastructure, etc., so any further reduction to those would equate to double-dipping.

Given the amount of derelict and contaminated land in the Borough, any release of Green Belt land flies directly in the face of one of its purposes; namely *"to assist in urban regeneration by encouraging the recycling of derelict and other urban land"*.

By releasing so much Green Belt land, the Council are basically admitting to have no plans over the next 15 years to encourage the recycling and remediation of derelict and contaminated land.

Especially when you consider that much of the housing land being released from Green Belt is for housing beyond the plan period.

At this moment in time, there are no exceptional circumstances whatsoever to release land for housing from Green Belt.