



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

**HEARING SESSION 6**

**MATTER 4 – HOUSING AND EMPLOYMENT  
ALLOCATIONS AND SAFEGUARDED LAND**

**PARKSIDE AND NEWTON-LE-WILLOWS/EARLESTOWN**

**ON BEHALF OF REDROW HOMES NORTH WEST &  
WALLACE LAND INVESTMENTS**

Date: May 2021

Pegasus Reference: P17-0098/R0012v2

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## **1. INTRODUCTION**

- 1.1 Pegasus Group has been instructed on behalf of their clients, Redrow Homes North West and Wallace Land Investments, to prepare Hearing Statements to the St Helens Local Plan Examination (EiP).
- 1.2 This Statement deals with **Hearing Session 6 Matter 4**, which discusses '**Allocations, safeguarded Land and Green Belt boundaries in Parkside and Newton-le-Willows/Earlestown**'. We have prepared separate Hearing Statements to deal with the remaining allocations and safeguarded land sites which are to be discussed at Hearing Sessions 4 & 5.
- 1.3 At the outset we note that the Council published an updated 'Employment And Housing Land Supply Position as of 31<sup>st</sup> March 2021' (**SHBC007**) on 12<sup>th</sup> May 2021, which extends the plan period to 2037 as the Council suggest they would do as a Main Modification in their responses to PQ24 and PQ25 and which we endorse.
- 1.4 Accordingly, this statement is based on this latest evidence and extended plan period; however we note that this post-dates, and therefore does not align with, the Inspectors questions. It has also given representors just 8 working days to respond, given the 21<sup>st</sup> May deadline for Matter 4 Statements.

**2. ISSUE 1: PARKSIDE EAST (7EA) AND PARKSIDE WEST (8EA), NEWTON-LE-WILLOWS**

**Question 1 - Do the Green Belt assessments support the allocation of Sites 7EA and 8EA and demonstrate exceptional circumstances for the removal of the land from the Green Belt?**

2.1 No comment.

**Question 2 - If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?**

2.2 No comment.

**Question 3 - Is the configuration and scale of allocation 8HA justified taking into account development needs and the Green Belt assessments?**

**a. Is the allocation of a SRFI of the scale proposed in the Plan justified?**

**b. Would a facility of a smaller scale (for example handling up to 8 to 10 trains daily) achieve similar benefits whilst minimising potential impacts (for example a reduced amount of Green Belt land needing to be released as these smaller options would only utilise land to the east of the M6 for road and rail infrastructure)?**

**c. Could the Plan's aim of seeking to maximise the opportunities of delivering an SRFI of regional and national significance still be achieved?**

2.3 No comment.

**Question 4 - Would the adverse impacts of developing Sites 7EA and 8EA (Green Belt impacts, landscape impacts, highway safety, flood risk, agricultural land, air quality) outweigh the benefits?**

2.4 No comment.

**Question 5 - Are the requirements for Sites 7EA and 8EA within Policies LPA04, LPA04.1 and LPA010 (Site 7EA) and Appendix 5 (Site Profiles) positively prepared and effective?**

2.5 No comment.

**Question 6 - Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities within Table 4.1 justified and effective?**

2.6 No comment.

**Question 7 - Will infrastructure to support the allocations be delivered at the right time and in the right place?**

2.7 No comment.

**Question 8 - Would there be delivery implication for sites 7EA and 8EA if a suitable connection to J22 (whether via the proposed Link road or an alternative link) is not delivered during the Plan period?**

2.8 No comment.

**Question 9 - In terms of feasibility and deliverability, will the future capacity of the rail network be capable of facilitating the delivery of an SRFI at Parkside?**

2.9 No comment.

**Question 10 – What level of certainty is there that there will be sufficient capacity and is that sufficient to demonstrate that the proposed facility will be deliverable during the Plan period?**

2.10 No comment.

**Question 11 – Are there any barriers to Sites 7EA and 8EA coming forward as anticipated?**

2.11 No comment.

**3. ISSUE 2: NEWTON-LE-WILLOWS/EARLESTOWN (7HA, 2HS, 4HS, 5HS)**

**Question 12 - Do the Green Belt assessments support the allocation of Site 7HA and the safeguarding of Sites 2HS, 4HS and 5HS and demonstrate exceptional circumstances for the removal of the land from the Green Belt?**

3.1 We address this in question 13 below.

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

3.2 The Council have demonstrated that exceptional circumstances are present to justify alterations to Green Belt boundaries at a boroughwide level (as addressed in question 4 of our Matter 3 Statement); however, Policy LPA05 fails to explain why exceptional circumstances exist to support specific allocations.

3.3 In respect of allocation 7HA, both the Council's and our own Green Belt Assessments (See **Appendix 1**) conclude that the site makes a low contribution to Green Belt purposes.

3.4 In terms of the safeguarded sites, we make the following comments, based on our detailed site proforma assessments contained at **Appendix 1**:

- **Site 2HS:** Scores the joint poorest of all safeguarded sites (along with 1HS) in the Council's own Green Belt Assessment. It is concluded to have a medium contribution to the purposes of the Green Belt; however, it is important to note that the assessment related to a larger land parcel and therefore does not correlate with the red line boundary for the safeguarded site. Our Green Belt Assessment also concludes a medium contribution, albeit it differs in that we consider it scores a medium-high contribution against purpose 3 (to assist in safeguarding the countryside from encroachment). This is because the site is very open in nature, due to a lack of vegetation cover and any built form. This leads to the site bearing many characteristics of the open countryside. Furthermore, the views are long-line in nature from Makerfield Drive, where landscape views looking northwards are particularly sensitive.
- **Site 4HS:** Again, the Council's Green Belt assessment related to a larger land parcel and therefore does not correlate with the red line boundary for the safeguarded site. Partly for this reason, our conclusions do differ to the Council's, who concluded an overall low contribution to the purposes of the Green Belt. We conclude that the site scores a medium contribution to the purposes of the Green Belt, because it scores a medium contribution to purpose 1 (to check unrestricted sprawl of large built-up area) and purpose 3 (to assist in safeguarding the countryside from encroachment).
- **Site 5HS:** Again, the Council's Green Belt assessment related to a larger land parcel and therefore does not correlate with the red line boundary for the safeguarded site. We disagree with the Council's conclusion that the site scores an overall low contribution to the

purposes of the Green Belt. We consider it to provide a medium contribution to Green Belt purposes, on the basis of medium contributions towards purposes 1 and 3. We have also identified an error in the Council's proposals map, which indicates that the land parcel to the south of the 5HS safeguarded site is not located within the Green Belt. It is shown just as white land, which is incorrect as this land is not being proposed for green belt release.

- 3.5 Whilst we list our specific concerns with the Green Belt Assessments for the sites above, one of our overarching concerns is that the Council's Green Belt Assessment did not undertake assessments specific to the safeguarded land red line boundaries. Instead, they relate to wider land parcels, which will inevitably have different conclusions to more detailed site-specific assessments. The Council must undertake site-specific assessments to rectify this matter and for the sites to be accurately assessed in terms of their Green Belt contributions. Until this is done, the Green Belt conclusions cannot be accurately relied upon to support the proposed safeguarded land status.
- 3.6 This is particularly the case given that we disagree with the Council's findings that sites 4HS and 5HS only provide a low contribution to the Green Belt. We consider them to score a medium contribution, the same as site 2HS. All 3 safeguarded sites score medium contributions to the overall purposes of the Green Belt.
- 3.7 Overall, it is our strong view that the Green Belt evidence has not demonstrated that safeguarded sites 2HS, 4HS and 5HS are any more suitable for allocation than other omission sites, including the Redrow site at Burrows Lane Eccleston, and the Wallace site at Mill Lane, Rainhill.

**Question 14 - Should Sites 2HS, 4HS and 5HS be allocated rather than safeguarded so that they can contribute to meeting needs in the Plan period?**

- 3.8 There is no compelling evidence to justify these sites being upgraded to immediate allocation- especially given that all sites provide a medium contribution to the purposes of the Green Belt in our assessments with 2HS scoring high on some matters. Furthermore, these sites cannot be allocated as the Council have not fully assessed the parcels, given that the Green Belt assessment did not undertake assessments specific to the red line boundaries and only assessed wider land areas. We also raise suitability issues with 4HS under question 15.
- 3.9 Should further allocations be required, which we strongly consider to be the case, the Plan should not look to automatically upgrade existing safeguarded sites. Any additional allocations need to be evidence led, align with the spatial distribution and be informed by the findings of the sustainability appraisal. As explained throughout our Hearing Statements, there are numerous compelling reasons as to why the sites at Burrows Lane, Eccleston and Mill Lane, Rainhill should be re-assessed for allocation purposes.

**Question 15 - Is the configuration and scale of allocation 7HA and safeguarded site 4HS justified taking into account development needs, the Green Belt assessments and, in the case of 4HS, the effects on the setting of the Vulcan Village Conservation Area and recreational facilities?**

- 3.10 The suggested scale of allocation 7HA (181 dwellings) is incorrect given the latest planning position on the site, which we explain in question 19; however we have no comment in respect of Green Belt matters.
- 3.11 In terms of site 4HS, as noted earlier we disagree with the Council's findings and consider it to provide a medium contribution to the purposes of the Green Belt (not low). We also consider that this safeguarded site is not fully justified, because of the following suitability issues:
- Access: would have to be accessed via mixed-use development to the west, however unclear whether the highways are adopted. Access would need to be upgraded to support the additional dwellings on this site, and not ideal from a design or highways perspective for vehicles to travel through the existing residential estate being built out to the west.
  - Heritage: until further details are provided about the potential archaeological implications of the Roman Road which runs through the site, we would flag this up as a site sensitive in heritage terms, especially given the adjacent Conservation Area. This should be provided now to justify the suitability of this safeguarded site.
- 3.12 In the absence of the above clarification, we are of the view that the selection of site 4HS is not justified.

**Question 16 - Would the adverse impacts of developing Site 7HA (Green Belt impacts, highway safety, loss of playing field) outweigh the benefits?**

- 3.13 No comment.

**Question 17 - Are the requirements for Sites 7HA and 2HS, 4HS and 5HS within Appendices 5 and 7 (Site Profiles) positively prepared and effective?**

- 3.14 No comment.

**Question 18 - In particular in relation to Site 7HA, will the Plan ensure that any playing fields lost will be replaced by the equivalent or better provision?**

- 3.15 The undetermined planning application on site (see below) proposes to provide replacement playing pitch facilities.

**Question 19 - Are the indicative site areas, net developable areas, minimum densities and indicative site capacities within Tables 4.5 and 4.8 justified and effective?**

- 3.16 The indicative site capacity for site 7HA (181 dwellings) is incorrect. A live planning application (P/2021/0028/FUL) is pending determination for:



*"Proposed redevelopment of the Red Bank Educational Unit to facilitate the relocation of Penkford School includes extension to existing building, new playing field, new car park, fences, amended access from Winwick Road and associated structures."*

- 3.17 The proposed site layout is contained at **Appendix 2**. Whilst yet to be determined, if approved, the planning application area comprises 3.98ha and significantly reduces the previously envisaged developable area (which will be halved). We suggest a reduced capacity figure of 90 no. dwellings to reflect the fact that the live planning application will reduce the site area by half.

**Question 20 - Will infrastructure to support the allocation be delivered at the right time and in the right place?**

- 3.18 No comment to make on this matter.

**Question 21 - Are there any barriers to Site 7HA coming forward as anticipated by the housing trajectory?**

- 3.19 Yes, the housing trajectory figure of 181 no. dwellings is incorrect. As explained for the reasons above, the housing trajectory should be amended to a reduced figure of 90 no. dwellings.

**4. ISSUE 3: OTHER GREEN BELT BOUNDARIES**

**Question 22 - Are the Green Belt boundaries elsewhere in Parkside and Newton-le-Willows/Earlestown justified?**

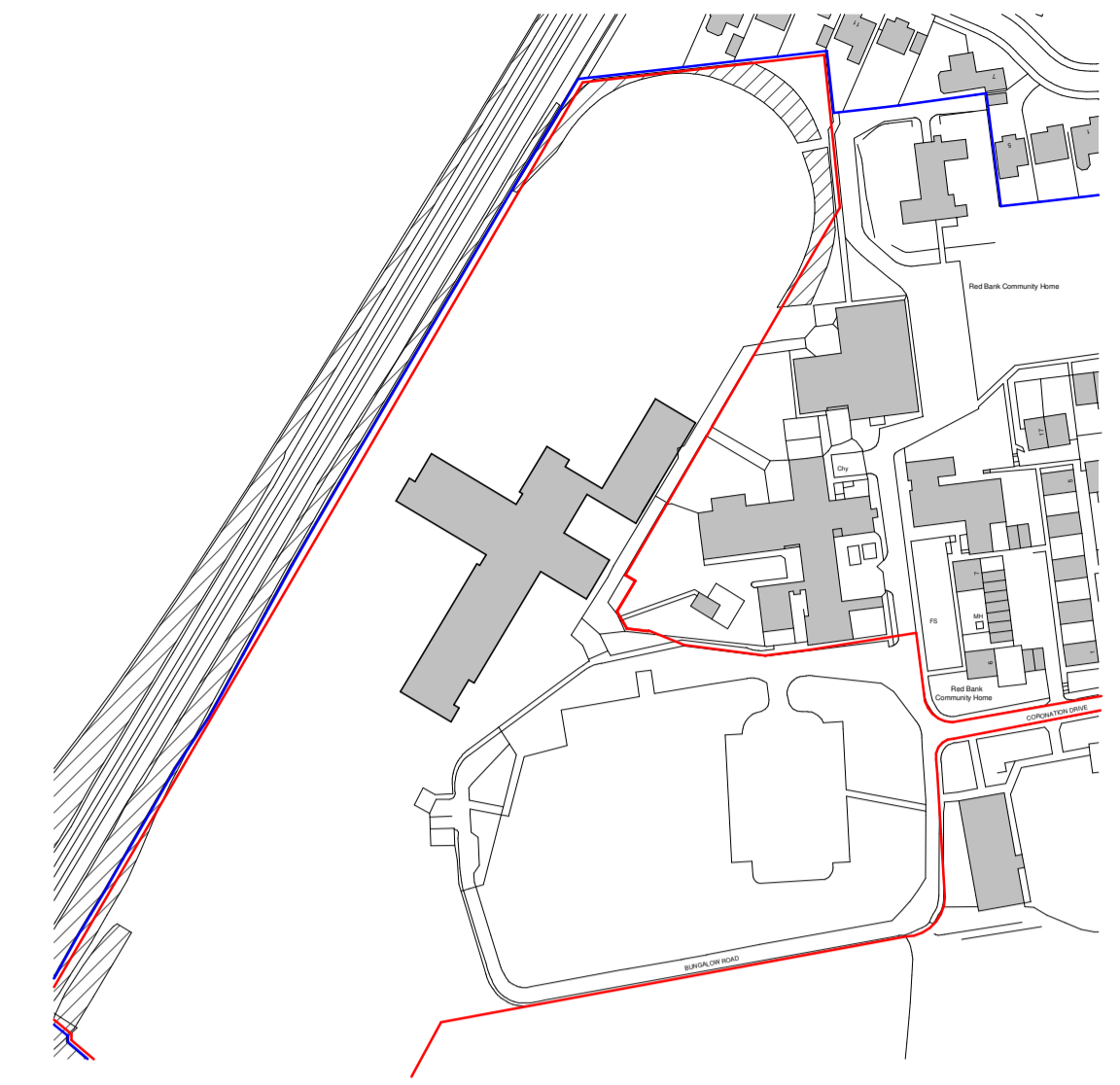
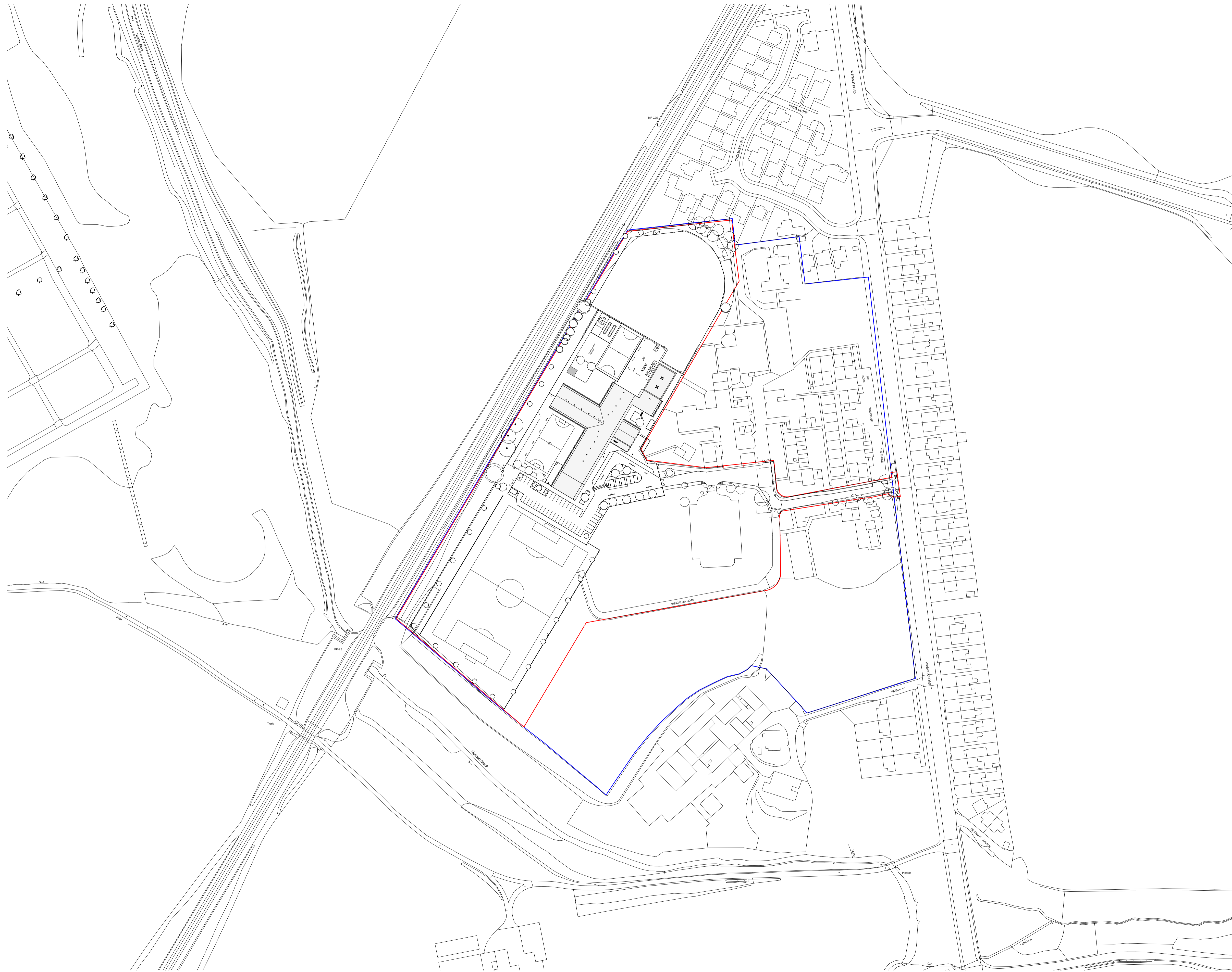
4.1 No comment.

**APPENDIX 1 - SITE PROFORMAS FOR PROPOSED ALLOCATIONS AND SAFEGUARDED SITES**

Please see attached as Appendix 1 of our Matter 4 Session 4 Statement (Ref: R010).

**APPENDIX 2- SITE LOCATION PLAN FOR LIVE PLANNING APPLICATION AT SITE 7HA**

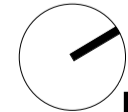




Proposed Site Plan

 **Hazard Identification No.**  
Refer to CDM Hazard and Risk Management Register

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Revision	Description	By	Date
P09	Landscape updated for planning	FD	18.03.21
P08	Updated for Planning	FD	19.02.21
P07	Red line revised to include Winwick Road entrance works	SG	06.01.21
P06	Red Line Updated	FD	15.12.20
P05	Updated Issue with revised site plan	FD	04.11.20
P04	Red line demise updated to include sports pitch	FD	17.09.20



Drawn	SG
Checked	JP
Approved	KH

Notes:  
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Project	Penkford School Winwick Road, Newton-le-Willows	Status	Information
Drg Title	Proposed Site Location Plan	Scale	As indicated
Drg No.	PENK-K2A-S0-XX-DR-A-90-002	Revision	P09