



St Helens Borough Local Plan 2020-2035 Examination  
Matter 4: Session 5 – Allocations, Safeguarded Land  
and Green Belt Boundaries Rainford, Billinge,  
Garswood and Haydock

May 2021

# Matter 4 – Allocations, Safeguarded Land and Green Belt Boundaries

- 1.1.1 Deloitte LLP is instructed by the Church Commissioners for England (“the Commissioners”) to submit representation to Matter 4: Session 5 of the Inspectors’ Matters, Issues and Questions (document reference: INSP007) (“the MIQs”). The representation provides a response to Issue 4, Question 30.

## **Issue 4: Other Green Belt Boundaries**

### **Question 30: Are the Green Belt boundaries elsewhere is Rainford, Garswood, Billinge and Haydock justified?**

- 1.1.2 This response has been prepared in the context of the proposed Green Belt boundaries at Rainford, informed by the supporting information submitted on behalf of the Commissioners, in response to earlier consultation stages within the plan-making process. This information focused on the Commissioners’ interests at Hydes Brow (Land to the west of News Lane) and the land east of Higher Lane / South of Muncaster Drive/ at White House Lane.

#### **The Green Belt Review 2018**

- 1.1.3 St Helens Borough Council (“the Council”) undertook a Green Belt Review published in 2018 (“the 2018 Review”) (document reference: SD020). The Commissioners’ objected to the approach taken by the Council in the assessment of the above-mentioned sites.
- 1.1.4 The 2018 Review discounted both sites as options for release, during Stage 1B, this being the second step in the five-step process identified below.

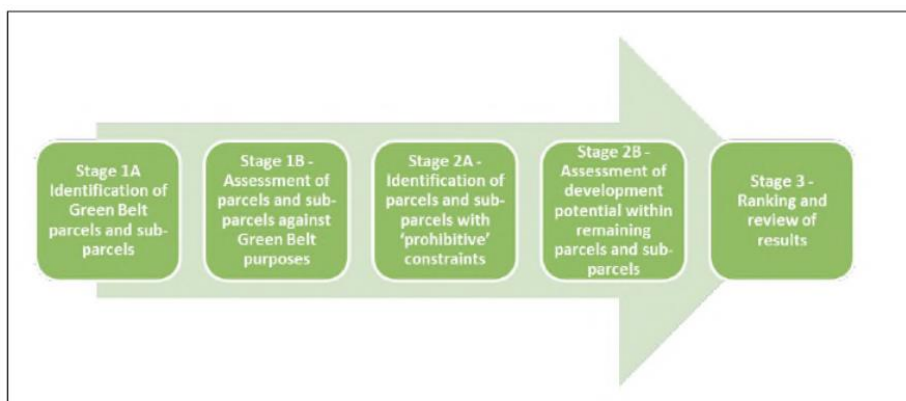


Figure 1: Main stages of the St Helens Green Belt Review (*St Helens MBC, 2018*)

1.1.5 At this stage, the Council only assessed the sites against the first three “purposes” of Green Belt, as set out at Paragraph 134 of the National Planning Policy Framework (“the NPPF”). Both sites scored “High” in relation to their contribution to Green Belt purposes and were therefore not carried forward to the next stages in the Green Belt Review. For the reasons detailed within the Commissioners representation to the Submission Draft Local Plan, it is considered that the score for both sites should have been identified as “Medium” by the Council.

1.1.6 The approach taken within the Council’s assessment of the suitability of these two sites for the release from the Green Belt, was therefore not proportionate and consequently the sites were not robustly assessed.

**The Evidence for Further Green Belt Removal at Rainford**

1.1.7 The Commissioners’ representation and appended Landscape Visual Assessment to the Submission Draft Local Plan, identify why both sites are suitable for allocation, having specific regard for landscape and Green Belt considerations. With regards to the Hydes Brow site, it was concluded that in combination with a new robust landscaping structure, the existing road and vegetation near the site would provide defensible boundaries. These boundaries could be reinforced as part of a robust landscaping framework within the site to further enclose development and assimilate the proposed built form into the landscape, using physical features that are readily recognisable and likely to be permanent, in compliance with the NPPF (Paragraph 139.f). As a result of this enclosure, the development of the site would further comply with national planning policy in that it would be perceived in the context of existing built form adjacent to the site, resulting in a slight foreshortening of the settlement gap between Rainford Junction and Rainford, without impacting on the openness of the wider Green Belt.

1.1.8 In terms of the Land to the east of Higher Lane, the aforementioned Landscape Visual Assessment concluded that the potential landscape effects from proposed development such as that contained within the Vision Framework that supported the Commissioners' Submission Draft Local Plan representation, would be localised to within the site. A number of mitigation measures were also recommended as part of this work, in order to ensure an appropriate setting could provide for the integration of development within the existing landscape context. The masterplan proposals that were submitted as part of the Submission Draft representation reflect these recommendations and help evidence that any potential visual effects from the future development would be largely limited to within the immediate context of the site.

1.1.9 The above and previously submitted information, demonstrates that the sites make a reduced contribution to the NPPF Green Belt purposes, when compared to the Council's assessment and that they are considered to provide a suitable opportunity for residential development.

#### **The Green Belt Review Stage 2B Assessment**

1.1.10 Since issuing the 2018 Review, the Council has undertaken an update. The Green Belt Review Stage 2B Assessments (October 2020) ("the Stage 2B Update"), sought to address the failings of the 2018 Review, notably that it had not fully evidenced the reasoning for not discounting the release of Stage 2b sites from the Green Belt. Whilst seeking to overcome this, the Stage 2b Update has also updated the detailed assessment proformas. It has not however updated the assessments for sites previously screened out at Stage 1b and 2a. Notwithstanding the Commissioners' concerns to the assessment of the Stage 1b sites discussed above, the Commissioners recommend that in order to ensure the Plan is considered sound in respect of this matter, the Council should seek to update the report for all sites, across all stages of the Green Belt review.

#### **Summary**

1.1.11 In respect of the above, it is not considered that the evidence base that has informed the proposed Green Belt boundaries at Rainford is justified, with there being other sites that are suitable for release within Rainford. As such, in accordance with Paragraph 34 of the NPPF, the identified boundaries are unsound.



This report has been prepared by the client and on the understanding that it will be made publically available. All copyright and other proprietary rights in the report remain the property of Deloitte LLP and any rights not expressly granted in these terms or in the Contract are reserved. Deloitte LLP accept no liability to any other party who is shown or gains access to this document. The information contained within this report is provided to assist the client with representation in the plan-making process. The report makes use of a range of third-party data sources. Whilst every reasonable care has been taken in compiling this report, Deloitte LLP cannot guarantee its accuracy.

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 1 New Street Square, London, EC4A 3HQ, United Kingdom. Deloitte LLP is the United Kingdom affiliate of Deloitte NSE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NSE LLP do not provide services to clients. Please see [www.deloitte.com/about](http://www.deloitte.com/about) to learn more about our global network of member firms.

© 2021 Deloitte LLP. All rights reserved