



St Helens Local Plan 2020-2035

Representations on Inspector's Matters, Issues and Questions

Hearing Statement

May 2021



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CONTENTS

1	Introduction
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2	Matter 4 Allocations, Safeguarded Land and Green Belt Boundaries Rainford, Billinge, Garswood and Haydock
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3	Conclusion
---	------------

Appendices

Appendix A – Response to Preferred Options Consultation
Appendix B – Response to Submission Draft Consultation

/1 Introduction

- 1.1. PWA Planning have been instructed by Seddon Homes Ltd to make formal representations on St Helens Borough Council's Local Plan in relation to the Inspector's Matters, Issues and Questions.
- 1.2. PWA Planning have previously made formal representations on the Local Plan in January 2017 and February 2018 on behalf of both Seddon Homes Ltd and the landowners Mr & Mrs Berry (see appendix A and B).
- 1.3. The representations previously put forward by PWA Planning asserted that the Local Plan had not fully considered that sufficient or suitable sites in Rainford had been identified for Green Belt release, and that additional housing allocations were required. Previous representations included the preference to allocate site HS20 (as referred to in the preferred options submission) for residential development. It is acknowledged that the method for calculating housing land has changed since then and this may well change again the future. Hence it is promoted that site HS20 be allocated as safeguarded land to help meet the potential needs for the future development in a logical location.
- 1.4. These representations respond to the Inspector's Matters, Issues and Questions to the Local Plan in relation to the soundness of the Plan and should be read in conjunction with previous representations.

/2 Matter 4: Allocations, Safeguarded Land and Green Belt Boundaries Rainford, Billinge, Garswood and Haydock

Issue 4: Other Green Belt boundaries

30. Are the Green Belt boundaries elsewhere in Rainford, Garswood, Billinge and Haydock justified?

- 2.1. PWA Planning maintain that the significant reduction in allocations for housing, including safeguarded land, from that detailed in the Local Plan Preferred Options has resulted in an insufficient amount of land being safeguarded for development within or beyond the Plan period. The reduction in allocations was due to a revision in the number of new dwellings per annum (dpa) the LPA aim to deliver, with the annual target reducing from 570 dpa to 486 dpa.
- 2.2. There were a total of 16 Housing Allocations identified within the Preferred Options Draft Plan and only 6 have been carried forward as Housing Allocations within the Submission Draft, whilst 1 has been allocated as Safeguarded Land and the remaining 9 have been removed from the Local Plan and are to remain as Green Belt.
- 2.3. Within the Preferred Options Plan there was a total of 24 sites allocated as 'Safeguarded Land' to meet the longer-term housing needs beyond the plan period. This included the site at Land South of Higher Lane and West of Mill Lane (ref. HS20). Of those 24 sites designated as Safeguarded Land, only 4 were carried forward as safeguarded land within the Submission Draft. HS20 was removed from the Submission Plan.
- 2.4. The housing requirement figure of 486 dwellings per annum identified within the Submission Local Plan is only just above the standard methodology using the 2014-based Household Projections and latest affordability ratio, which is a figure of 482 (SHMA January 2019). The NPPF has a strong focus on increasing the supply of new housing and Section 5 promotes the Government's objective to significantly boost the

supply of new homes. The Submission Draft Local Plan which sets a housing requirement of just above the standard method risks the Local Plan underdelivering on its housing requirements.

2.5. As a consequence of potential under delivery, or indeed future changes to the calculation of housing supply, there remains a real risk that there will be a significant rise in development pressure on the Green Belt during and beyond the plan period. The Council, in producing a new plan, should be well placed to ensure they are able to accommodate for under delivery of housing or increase in development pressure through the allocation of a sufficient quantum of safeguarded land. Presently it is thought the Local Plan in its current form does not make sufficient safeguarded land allocations and therefore PWA maintain the Green Belt Boundaries within Rainford are not justified and should be revised, and therefore are not sound

2.6. When considering the need for the allocation, regard must be had for Paragraph 136 of the NPPF which for clarity reads as follows:

"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans."

2.7. The preparation of the St Helens Local Plan therefore represents a once in a generation opportunity to modify the current Green Belt boundaries and therefore overwhelming weight should be placed on ensuring that modifications are of a scale which protect against the need to revisit said boundaries within and beyond the plan period. This is

further emphasised in NPPF Paragraph 139 which in relation to modifying Green Belt boundaries states that Plans, amongst other things, should:

- c) "where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."*

2.8. The site at Land South of Higher Lane and West of Mill Lane (ref. HS20), was previously allocated as safeguarded land. This site is a logical one for such an allocation given it is largely contained by existing built development to the south east and south west and the large housing allocation (8HA) to the north west. Hence in the context of the above excerpt from the NPPF the site is in part bound by permanent physical features. Moreover, as noted the significant reduction in safeguard allocations has resulted in a situation whereby PWA Planning believe there will be pressure to revisit Green Belt boundaries before the end of the plan period. It is therefore requested that the site be reallocated as safeguarded land as part of the Local Plan. In its current form the Plan fails to accommodate for development needs which stretch beyond the plan period and when dealing with redefining of Green Belt boundaries it is of immense importance that such foresight is adopted given the infrequent nature such modifications can be revisited.

2.9. It is not asserted that the LPA will be under any immediate pressure to allow development on site HS20, however its allocation as safeguarded land allows for

further growth in Rainford should it be needed in the future. Failure to make such an allocation could result in less preferable sites being brought forward when the need arises.

2.10. Aside from site HS20 representing a logical extension to the existing allocation 8HA, weight should be given to fact that when redefining Green Belt boundaries LPAs need to be reassured that the proposed boundary is reasonably defensible should a planning application be submitted in the future. In this regard site HS20 represents a clear and logical termination point for development in Rainford namely, but not solely, because it brings development in line with Rainford Industrial Estate and the relatively recent residential development along Mill Lane. The below image shows the site we proposed be allocated as safeguarded land (red) alongside the development limits of Rainford (blue), housing allocation 8HA (orange) and employment allocation 9EA (purple).



Figure 1: Proposed Safeguarded Land allocation HS20 in the context of Rainford

2.11. As such by not allocating the site the LPA may well be leaving themselves open to speculative planning applications which seek to challenge the contribution the site makes to the Green Belt. By allocating it as safeguarded land the LPA are not only

enabling the appropriate expansion of the settlement and controlling when it ought to be brought forward but are also ensuring the proposed Green Belt boundary is robust should they have to defend it as part of future planning applications/appeals.

/3 Conclusion

- 3.1. St Helen's approach is not consistent with the government's objective of significantly boosting the supply of new homes due to the inadequate provision of safeguarded land, specifically in Rainford. Furthermore, the Plan fails to accord with Paragraph 139 of the NPPF in that it does not safeguard an adequate amount of land to meet longer-term development needs stretching well beyond the plan period.
- 3.2. For the Local Plan to be considered sound the following modifications are required:
 - Additional safeguarded land should be allocated in Rainford, specifically previous safeguard allocation HS20.
- 3.3. It is considered that the above modifications are essential to ensure that the Local Plan is positively prepared.

Appendix A – Response to Preferred Options Consultation

ST. HELENS LOCAL PLAN 2018-2033 PREFERRED OPTIONS

SITE REF. HS20: LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE, RAINFORD

REPRESENTATIONS ON BEHALF OF MR AND MRS J & M BERRY

February 2018

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1. INTRODUCTION

- 1.1. PWA Planning is retained by Mr and Mrs J and M Berry to make representations to St. Helens Council on the St. Helens Local Plan 2018 - 2033 Preferred Options paper published in 2016, with specific reference to sites promoted within that document.
- 1.2. In particular we seek to promote the allocation of land located to the south of Higher Lane and to the west of Mill Lane, Rainford as outlined in the Location Plan provided as Appendix 1. This site was the subject of previous representations made by PWA Planning in 2017 in response to the St. Helens Local Plan 2018 - 2033 Preferred Options paper. The land in question is identified within the Preferred Option paper by reference HS20 (Land South of Higher Lane and west of Mill Lane, Rainford), see extract provided as Appendix 2.
- 1.3. Site HS20 is identified as a potential site for removal from the Green Belt to be allocated as 'Safeguarded Land' in the Preferred Options paper. The purpose of allocating Safeguarded Land sites is to protect such sites from permanent forms of development for the duration of the plan period in order to provide a reserve of potential sites to meet longer term development needs (after 2033) and so protect the permanence of the Green Belt.
- 1.4. HS20 sits adjacent to a site identified with the reference HA15 (Land South of Higher Lane and east of Rookery Lane, Rainford). HA15 (see extract provided as Appendix 3) is identified for removal from the Green Belt to be allocated for housing in the Preferred Options paper.
- 1.5. PWA Planning are of the opinion that site HS20 should be brought forward as a housing allocation within the plan period 2018 2033, either as an extension to site HA15, or as a separate allocation. This document together with a number of technical reports (listed below) will demonstrate that there are no technical or environmental constraints which would prevent HS20 being brought forward as a housing allocation within the plan period.
- 1.6. This document should be read in conjunction with the following:
 - Appendix 1 – Location Plan
 - Appendix 2 – HS20 allocation
 - Appendix 3 – HA15 allocation
 - Appendix 4 – Ecology Assessment
 - Appendix 5 – Arboricultural Assessment
 - Appendix 6 – Phase 1 Geo-technical Assessment
 - Appendix 7 – Flood Risk Assessment
 - Appendix 8 – Surface Water and Foul Water Drainage Assessment
 - Appendix 9 – Utilities Statement
 - Appendix 10 – Transport and Access Technical Note
 - Appendix 11 – Site Masterplan

2. SITE CONTEXT

- 2.1. Site HS20 extends to approximately 16ha and is currently allocated as Green Belt as per the St. Helens UDP Proposals Map. The site is located to the east of the centre of Rainford and directly adjacent to the east of site HA15, separated by a belt of woodland. The site is bounded by the B5205 Higher Lane to the north, beyond which are a small number of properties and open fields. To the east is Mill Lane, off which are located a number of residential properties, including a cluster of 26 modern dwellings off The Manor and Meadow View to the southeast of the site. To the south of the site is the Rainford Industrial Estate which extends the length of the site and beyond to the south of HA15. HS20 is therefore effectively bounded to the south and much of the east by existing development, and would be bound to the west by the development of HA15.
- 2.2. The wider surrounding area to the north, east and south is semi-rural in nature, comprising agricultural fields, farmsteads, individual and groups of dwellings, together with pockets of woodland. The site is located approximately 1km to the northeast of the A570 Rainford by-pass, from which the A580 and M58 are easily reached. The Rainford Linear Park runs to the immediate south of the site providing pedestrian access to the centre of Rainford, located approximately 1.5km away. There are shops, services, schools, health care facilities and employment opportunities within walking distance of the site. Existing bus services route past the site along Higher Lane from where services to St. Helens and Ormskirk are frequently available. Both HS20 and HA15 are considered to be located sustainably in the context of the NPPF.
- 2.3. HS20 is considered to be well contained in landscape and visual terms (alongside HA15), bound by development to the south as far as the site extends to Mill Lane, and to the east. It is considered that the development of the land would be limited to localised impacts which could be mitigated by local landscape enhancements.
- 2.4. Constraints relating to flood risk and drainage, utilities, ecology, trees, land contamination/geo-technical issues and transport/highways will be addressed in section 4 of this statement. In summary, there do not appear to be any insurmountable technical or environmental constraints which would preclude the site being brought forward for housing at this stage. In addition, it appears that there are no constraints preventing the delivery of HS20 in conjunction with HA15.

3. COMPLIANCE WITH NATIONAL PLANNING POLICY

3.1. The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to deliver sustainable development. There are three dimensions to sustainable development; economic, social and environmental, which give rise to the need for the planning system to perform a number of roles. Within the economic role there is a need to contribute to a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. The social role includes the need to support strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations, whilst the environmental role includes contributing to protecting and enhancing the natural, built and historic environment.

3.2. Paragraph 14 of the NPPF sets out the presumption in favour of sustainable development. For plan making, this means that:

- *“Local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *Specific policies in this framework indicate development should be restricted.”*

3.3. Paragraph 17 sets out the NPPF’s core planning principles, amongst which are that planning should:

“Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.”

3.4. Section 6 of the NPPF states that, in order to boost significantly the supply of housing, local planning authorities should:

- *“Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework [NPPF], including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the*

market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

- *Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11 – 15.*
- *For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.”*

3.5. With regards to what is considered ‘deliverable’ and ‘developable’, footnotes states that:

“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years and in particular that the development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

“To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.”

- 3.6. The Preferred Options paper identifies a need for 10,830 new dwellings in St Helens as a minimum to be delivered during the period 1st April 2014 to 31st March 2033, which equates to an indicative annual average of 570 houses per year.
- 3.7. Since the publication of the Preferred Options, the Liverpool City Region SHELMA (Strategic Housing and Employment Land Market Assessment) has been published (January 2017). This identifies the objectively assessed need (OAN) for St Helens as 416 houses per year, reduced from the previous figure of 451. The OAN is based purely on predicted demographic changes. The SHELMA provides further housing needs figures based on an ‘Economic Baseline Scenario’¹ and an ‘Economic Growth Scenario’². The economic baseline figure is 397, whilst the growth scenario predicts that 855 new homes per year will be required in St Helens.
- 3.8. The September 2017 consultation paper on housing in England ‘*Planning for the right homes in the right places*’, which set out a proposed standard method for calculating local authorities’ housing need, stated that St Helens would need to provide 504 new homes per year.
- 3.9. It is noted that three of the four annual housing requirement options (considered and rejected) earlier in the Local Plan preparation included an annual requirement figure in excess of that proposed, and in two cases, considerably so. It seems apparent that the chosen figure of 507 more closely reflects constraints to development which have been apparent in the district, rather

¹ Economic Baseline Scenario – based on Oxford Economics baseline model

² Economic Growth Scenario – based on information provided by local authorities.

than a figure which seeks to positively respond to the economic growth and population rebalancing agenda of the authority, with reference to the growth figure referred to above. It is therefore likely that a higher annual requirement figure would be more appropriate.

- 3.10. It is considered that even the identified need of 570 homes per year may not be adequately met through the proposed allocations and that there is a significant risk that there will be insufficient allocated housing sites which will allow the authority to meet its short-term (rolling five-year supply) housing needs, as well as those over the longer term. In such circumstance it seems apparent that the release of safeguarded land will be necessary at an early stage in the Local Plan period, as being the only realistic way in which the Council can boost short term supply.
- 3.11. Policy LPA05: Meeting St Helens Housing Need in the Preferred Options paper states that in situations where there is an under-delivery due to a lack of land supply the allocated 'safeguarded sites' will be considered for release, as part of a review of the Local Plan. It is the opinion of PWA that this suggestion ignores the fact that such an approach will require significant time, and this will leave the authority prone to planning applications on land that the Council could struggle to defend. We believe it far more preferable to release suitable sites from the Green Belt now, so that obligations under the NPPF to ensure that sufficient deliverable and developable land is available to meet housing needs during the plan period are met.

4. TECHNICAL AND ENVIRONMENTAL ISSUES

- 4.1. In order to demonstrate that the land identified as HS20 is deliverable and developable, our client has commissioned a number of technical specialists to investigate any site constraints which might prevent the site being brought forward for housing in the Plan period. The assessment work undertaken has also looked at the adjacent HA15 allocation, albeit to a lesser extent.
- 4.2. Following this, an indicative layout for the site has been developed, together with a concept plan of how the site could work in conjunction with HA15. This is presented in Section 5 of this report.

Ecology

Site HS20

- 4.3. An Ecological Assessment has been undertaken for the HS20 site (see Appendix 4), comprising a desk based review of relevant ecological information and an Extended Phase I Habitat Survey. The assessment has found that the site, comprising arable land, does not form part of any statutory site designated for nature conservation and has no functional habitat links to designated sites in the wider area. Boundary habitats, such as the woodland and hedgerows, do provide some local wildlife value and are likely to be retained as part of any development.
- 4.4. The assessment has looked at the potential for harm to protected species. No issues are anticipated in respect of birds provided typical mitigation measures are employed such as avoiding construction during the bird breeding season and ensuring that nesting habitats are checked prior to clearance/construction.
- 4.5. The majority of habitats on site are considered to provide limited interest for bats, and the loss of the majority of these features would be anticipated to have a negligible impact on local bat populations. Although the majority of the trees within the woodland between the two sites provided little or no bat roost potential, a small number support some low suitability features, and it is therefore recommended that trees are retained where possible, or checked further for bat roost potential if removal is necessary.
- 4.6. No badger setts have been identified within or immediately adjacent to the site and the lack of evidence of badger activity in the area suggests this species is unlikely to be impacted.
- 4.7. The site is considered to provide unsuitable habitat for water vole and otter. The presence of the stream running through the woodland between the sites should be retained and protected as part of any development.
- 4.8. With regards to amphibians and reptiles, although there are a number of ponds locally, none lie within the site and are separated by major roads and other built development, considered to present a barrier to amphibian dispersal. Although no records of great crested newts have been found within a 2km radius, the site's boundary habitats provide potential habitat and as such presence/absence surveys for great crested newts are recommended as a precaution. Depending on the outcome of any great crested newt surveys, it is considered that construction works could adopt Reasonable Avoidance Measures to ensure that there would be no adverse impacts on such amphibians. No impacts are anticipated on lizards.

Site HA15

- 4.9. The Ecology Assessment has had regard to the potential development of the adjacent HA15, although no walkover survey of this site has been undertaken. The assessment concludes that the development of the adjacent HA15 would not materially alter the findings of the main assessment as the neighbouring fields are also intensively managed agricultural land.

Constraints and Recommendations

- 4.10. The site does not present any serious constraints to development. It is recommended that the woodland between the two sites and boundary habitats are retained and strengthened. Habitat connectivity and diversity on site can also be strengthened and enhanced as part of overall biodiversity benefits through additional landscaping planting, provision of bird and bat boxes and creation of a pond on site.

Arboriculture

- 4.11. An arboricultural constraints report has been provided for site HS20 to identify development constraints and help inform the indicative layout for the site. A Tree Constraints Plan is also provided (see Appendix 5).
- 4.12. The woodland belt between HS20 and HA15 is assessed as being of retention category A, indicating that trees are of high quality with an estimated remaining life expectancy of at least 40 years. This group of trees has also been identified as the subject of a Tree Preservation order (TPO) and it is recommended that the majority of these trees are retained where possible.
- 4.13. All other trees and hedgerows within the site, which are exclusively located in the site boundaries, are either category B (trees of moderate quality, with a remaining life expectancy of at least 20 years), or category C (trees of low quality, with a remaining life expectancy of at least 10 years, or young trees with a stem diameter of below 150mm).

Constraints and Recommendations

- 4.14. Where possible, all trees should be retained.

Geo-Environmental and Land Contamination

- 4.15. A Phase I Geo-Environmental Assessment has been undertaken for the HS20, and regard has been had to the conditions on the adjacent HA15 (see Appendix 6).

Site HS20

- 4.16. The assessment has considered the potential for contaminated land and geotechnical liabilities associated with a proposed future residential development. No major issues have been identified with the site, however further investigative works are recommended as outlined below.
- 4.17. There are no landfill sites located within influencing distance of the site, and there are no issues with regards to radon.
- 4.18. A coal mining assessment has been undertaken as part of the assessment which has identified the Arley coal seam outcropping within the north-eastern corner of the site. Additional mine entries are known to be located within the vicinity of the site associated with the Arley seam. The site is therefore deemed to be at high risk in terms of the potential presence of shallow mine

workings. Detailed intrusive works are therefore be recommended in this area of the site depending on the location of development proposed.

- 4.19. With regards to geotechnical issues, the topography of the site indicates that significant earthworks could be required to create a level development platform. In addition, it is likely that there may be limited made ground fill deposits and obstructions. If further investigations reveal that these deposits are deep, there may be a requirement for an abnormal foundation solution. Neither of these issues are considered to be prohibitive to development.
- 4.20. The assessment has looked at potential contamination sources. The site is considered to present a low risk to human health during construction and as a residential end-use, however further investigation would be required to confirm this and inform any mitigation measures. Investigative works would also reveal and issues in terms of controlled waters and ground gas, and how potential issues could be mitigated. There are no issues regarding potable waters.

Site HA15

- 4.21. A desk-based assessment of the adjacent site shows that the contaminant sources are likely to be the same as at HS20. Again, there are no issues in terms of landfill or radon. Coal mining is less of an issue as the seam outcropping at HS20 dips away, therefore intrusive investigations are unlikely to be required.

Constraints and Recommendations

- 4.22. The assessment has not identified any major barriers to development associated with the site. The presence of coal mining in the area, and particularly in the north-eastern corner of HS20 will need further investigation, as will potential sources of contamination associated with the site. There are considered to be mitigation solutions available to any issues raised.

Flood Risk

- 4.23. A Flood Risk Assessment (FRA) has been undertaken for both sites (see Appendix 7). The assessment identifies that HS20 and HA15 lie within Flood Zone 1, the lowest risk which is identified as land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (<0.1%). Both sites are at very low risk of surface water flooding except for an area of HA15 along its southern boundary, which is at high risk.
- 4.24. The risk of flooding from fluvial sources, canals, reservoirs and other artificial sources, ground water, sewer and pluvial runoff and development drainage, is low.

Constraints and Recommendations

- 4.25. A development specific FRA would be required to accompany any future planning application. Any masterplanning of HA15 would need to take account of possible surface water flow, which should be positively drained to the watercourse between the sites.

Surface Water and Foul Water Drainage Strategy

- 4.26. A surface water and ground water drainage strategy has been produced for HS20 which includes a preliminary surface water drainage design, with the adjacent HA15 also taken into account (see Appendix 8).

Site HS20

- 4.27. The nature of the local geology means that infiltration of surface water runoff back into the ground is not feasible. Surface water runoff from the developed HS20 would discharge, where site levels permit, into the watercourse that flows to the south between the two parcels of land. A restricted discharge will be made equivalent to pre-development runoff.
- 4.28. It is proposed that surface water runoff from the area of HS20 that cannot discharge into the watercourse would be restricted to a minimum flow of 5 l/s and discharge into the public surface water sewer that lies within Sandwash Close. The preliminary surface water drainage design has catered for surface water runoff generated by all rainfall events up to the 100 year critical rain storm plus 30% on stored volumes and demonstrates, at this stage, that it can be accommodated within the indicative masterplan. The additional 30% is to allow for climate change and has been included in the surface water volume.
- 4.29. Foul water discharges from the site would be allowed to drain unrestricted to the public combined / foul sewer network, the preferred point of discharge being to the public combined / foul sewer located within Mill Lane and / or Sandwash Close.

Site HA15

- 4.30. It is expected that surface water runoff from HA15 would also be attenuated to pre-development runoff rates and discharge into the watercourse that flows between HS20 and HA15. The preferred point of discharge from HA15 is the public foul sewer located within Rookery Lane.

Constraints and Recommendations

- 4.31. A surface water and foul water drainage strategy would be required to accompany any future planning application for the development of HS20 and/or HA15. No issues are anticipated in terms of drainage.

Utilities

- 4.32. A Utilities Statement has been produced which primarily addresses site HS20, and also takes account of the adjacent HA15 (see Appendix 9). The purpose of the statement is to give an initial overview of the utility infrastructure available for potential residential development of the two sites.
- 4.33. Services relating to electricity, gas, water, drainage, cable and telecoms has been considered. As presented in the statement, it has demonstrated that should both sites be developed for residential purposes of the indicative size considered, they would be capable of being adequately serviced by the utility companies outlined in the report.

Transport and Access

- 4.34. A technical assessment of HS20 and HA15 for residential development has been undertaken which considers the proposed access points for HS20, junction and highway capacity in the vicinity of this site, and the sustainability of the site in terms of proximity to local services.
- 4.35. The assessment has found that both sites are accessible by a choice of transport modes and that local facilities are accessible by means other than private car, leading to the conclusion that the sites are in a sustainable location for residential development.

- 4.36. High levels of visibility are typically available on Higher Road, and the proposed HS20 access junctions can be provided with visibility splays substantially exceeding the required standards. It is considered that traffic demand is sufficiently low that only simple priority junctions are required to serve HS20.
- 4.37. The existing junction of Higher Lane/Mill Lane, at which a small accident cluster is located, has sub-standard visibility splays and it is considered that the development of HS20 may present an opportunity to improve the visibility at this junction.

Constraints and Recommendations

- 4.38. It is considered that the local highway network has sufficient capacity to accommodate the development of both HS20 and HA15 for residential development. Site access points have been identified for HS20 which are considered to be acceptable in visibility and capacity terms. It is expected that similar analysis of the junctions required to access HA15 would need to be undertaken prior to a proposal coming forward for that site.

Land Ownership

- 4.39. Site HS20 is in the ownership of one landowner; Mr and Mrs Berry, on behalf of whom this representation is made. The owners are keen for the land to be developed and as such there should be no barrier to development in this regard.

Conclusions

- 4.40. The assessment work undertaken as summarised above has demonstrated that there are no major technical or environmental constraints to development. Additional work would be required with regards to ecology, land contamination and coal mining, and to inform mitigation to address any potential issues.

5. SITE LAYOUT

- 5.1. The above assessment work has helped to inform the indicative layout provided for site HS20, and the conceptual layout for site HA15 (see Appendix 10 for layouts). Both layouts have had regard to the indicative dwelling numbers and densities provided in the Preferred Option paper.
- 5.2. The indicative layout for HS20 comprises 429no. dwellings (against a recommendation of c 415no. dwellings in the Preferred Options paper). The following has influenced the layout design and /or been incorporated:
- Housing typically runs along the contours of the site to reduce costly cut and fill exercises and maximise potential for open views across the site and surroundings;
 - Site entrances are as per those recommended as part of the initial highways assessment;
 - Important habitats and landscape features preserved through retention of woodland buffer between sites and retention of trees and hedgerows along the site boundaries;
 - Landscape buffer to existing northern highway boundary to set the scheme into its semi-rural setting;
 - Landscape buffer to industrial / southern boundary;
 - A number of public open spaces are spread across the site, notably in the north-eastern corner of HS20 where the potential for issues in relation to previous coal mining activities exist, reducing potential for costly mitigation works;
 - Attenuation pond in the southeast corner of the site, influenced by the findings of the drainage assessment;
 - Internal road network and turning heads allow sufficient manoeuvring space around the site;
 - Ample opportunity for green corridors / linkages in keeping with the semi-rural setting; and
 - Orientation of units provide good solar aspect to gardens / external spaces.
- 5.3. It is considered that the indicative layout for HS20 sufficiently demonstrates that, when all constraints are taken into account, the site is capable of delivering the number of houses indicated in the preferred options paper.
- 5.4. The applicants have not had access to HA15 to consider any constraints in detail. However, the high-level assessment presented has led to the formulation of a conceptual layout as provided in Appendix 10, which would deliver c 175 no dwellings as suggested in the Preferred Options Paper.
- 5.5. In terms of the two sites working together, the analysis undertaken has indicated that the woodland buffer between the two sites should be retained, effectively separating the sites into two separate parcels. As demonstrated, the sites are subject to a number of similar constraints, with some differences in terms of surface water drainage and coal mining identified.

- 5.6. One of the key issues in terms of both sites being delivered is with regards to the impacts on the local highway network. In this regard, the assessment work has shown that there is sufficient capacity to deliver both sites for the number of houses indicated in the Preferred Options Paper.

6. CONCLUSIONS

- 6.1. PWA Planning is of the opinion that the allocation of site HS20 for housing development as part of the emerging Local Plan is consistent with the NPPF in terms of providing deliverable and developable land to assist St Helens in meeting its housing need during the plan period.
- 6.2. The site is located adjacent to housing allocation HA15 in the Preferred Options paper, and is considered to be well contained by the existing physical boundaries of development to the south of the site in the form of Rainford Industrial Estate, and the development to the east of the site on Mill Lane.
- 6.3. It has been demonstrated, with reference to the technical and environmental reports provided with this representation, that there are no insurmountable barriers to the delivery of the site for housing. In addition, there are no constraints preventing the development of HS20 in conjunction with HA15.
- 6.4. **Given the importance of ensuring that the St Helens Local Plan 2018 - 2033 is able to identify an adequate supply of housing for the plan period, it is considered that site HS20 should be allocated for housing development at this stage, rather than as safeguarded land.**

Appendix B – Response to Submission Draft Consultation



ST. HELENS LOCAL PLAN 2020-2035: SUBMISSION DRAFT

LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE,
RAINFORD

**Representations on Behalf of Mr & Mrs Berry
(landowners) and Seddon Homes (prospective
developer)**

March 2019



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CONTENTS

1	INTRODUCTION
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2	SITE CONTEXT
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3	SUBMISSION DRAFT LOCAL PLAN
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4	RESPONSE TO SUBMISSION DRAFT LOCAL PLAN
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5	CONCLUSIONS
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Appendices

1	Location Plan
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2	St Helens Local Plan Preferred Options Representations
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/1 INTRODUCTION

- 1.1. PWA Planning is retained by Mr & Mrs Berry (landowners) and Seddon Homes (prospective developer) to make representations on the St. Helens Local Plan 2020 – 2035 Submission Draft, published January 2019.
- 1.2. In particular we seek to promote a housing-led allocation of land located to the south of Higher Lane and to the west of Mill Lane, Rainford as outlined in the Location Plan provided as Appendix 1.
- 1.3. This site was the subject of previous representations made by PWA Planning in 2017 and 2018 in response to the St. Helens Local Plan 2018 - 2033 Preferred Options paper, a copy of which is provided in Appendix 2. The land in question was identified within the Preferred Option paper as a potential site for removal from the Green Belt to be allocated as 'Safeguarded Land' (Reference HS20: Land South of Higher Lane and west of Mill Lane, Rainford).
- 1.4. The representations to the Preferred Options paper were accompanied by a number of technical reports which demonstrated that there are no technical or environmental constraints which would prevent HS20 to be brought forward as a housing allocation within the plan period.
- 1.5. Within the St Helens Borough Local Plan 2020 – 2035 Submission Draft, published in January 2019, the site is not brought forward as a Housing Allocation nor as Safeguarded Land and therefore within the emerging plan, the site would remain as Green Belt land.
- 1.6. PWA Planning are of the opinion that the site in question should be brought forwards as a Housing Allocation within the plan period 2020 to 2035. A Housing Allocation on the site would be consistent with the NPPF in terms of providing deliverable and developable land to assist St Helens in meeting its housing need during the plan period.

Developer Statement

- 1.7. Seddon Homes, part of the Seddon Group, is a quality residential developer that has successfully delivered new homes for the past 50 years throughout the North West and Midlands. They are currently active in a number of adjacent Local Authorities and markets, such as West Lancashire, where they are currently on site delivering 128 dwellings in Banks, near Southport. A nearby scheme in Westbrook, Warrington is about to commence on a previously allocated employment site for 81 dwellings, which was permitted consent in December 2018 and Wigan, where a planning application is currently pending for 98 dwellings off Sovereign Fold Road, Leigh.
- 1.8. Seddon Homes currently build up to 200 dwellings per annum, and are looking to mature their business organically to 400-450 homes per annum over the next 3 years with a mixed portfolio of strategic sites and immediate purchases. Their developments are a higher than average internal and external specification and this has been recognised through numerous awards and recognitions with regards to the design quality of their developments.
- 1.9. Seddon Homes and the Seddon Group are working with the landowners of the site at Rainford to see its early release for housing development and then a phased development for housing over the early parts of the plan process. Seddon has the capacity to deliver this site and sees this as an area of strong demand where development will help to build and extend existing communities and where development will help to meet the housing needs of all sections of the local community.
- 1.10. Seddon will continue to support the landowner in its endeavours to see the site removed from the Green Belt and instead allocated for other uses, as was provided for within the preferred options version of the Local Plan.

/2 **SITE CONTEXT**

- 2.1. As described within the Local Plan Preferred Options Representations submission, the site is located to the east of the centre of Rainford and extends to approximately 16ha. The site is bounded by the B5205 Higher Lane to the north, beyond which are a small number of properties and open fields. To the east is Mill Lane, off which are located a number of residential properties. To the south of the site is the Rainford Industrial Estate.
- 2.2. Within the St Helens Submission Draft Local Plan, land adjacent to the west of the site has been identified as removal from the Green Belt to be allocated as a Housing Allocation with a total site capacity of 259 dwellings (8HA: Land South of Higher Lane and east of Rookery Lane, Rainford).
- 2.3. The wider surrounding area to the north, east and south is semi-rural in nature, comprising agricultural fields, farmsteads, individual and groups of dwellings, together with pockets of woodland. The site is located approximately 1km to the northeast of the A570 Rainford by-pass, from which the A580 and M58 are easily reached.
- 2.4. The site is considered to be a sustainable location for development. There are shops, services, schools, health care facilities and employment opportunities within walking distance of the site. Existing bus services route past the site along Higher Lane from where services to St. Helens and Ormskirk are frequently available. The Rainford Linear Park runs to the immediate south of the site providing pedestrian access to the centre of Rainford, located approximately 1.5km away.

Technical and Environmental Issues

- 2.5. Assessment work undertaken and provided as part of the Local Plan Preferred Options representations demonstrated that there are no major technical or environmental constraints to development. The following assessments and supporting information were undertaken on the site and are provided within Appendix 2:

- Ecology Assessment
- Arboricultural Assessment
- Phase 1 Geo-technical Assessment
- Flood Risk Assessment
- Surface Water and Foul Water Drainage Assessment
- Utilities Statement
- Transport and Access Technical Note
- Site Masterplan

2.6. In addition, it appears that there are no constraints preventing the delivery of the site in question in conjunction with the adjacent Housing Allocation within the Submission draft (ref. 8HA). The site is considered to be well contained in landscape and visual terms (alongside 8HA), bound by development to the south as far as the site extends to Mill Lane, and to the east. It is considered that the development of the land would be limited to localised impacts which could be mitigated by local landscape enhancements.

2.7. There do not appear to be any insurmountable technical or environmental constraints which would preclude the site being brought forward for housing at this stage.

/3 SUBMISSION DRAFT LOCAL PLAN

- 3.1. The St Helens Borough Local Plan 2020 - 2035 Submission Draft sets a housing requirement of 486 dwellings per annum and identifies 10 Housing Allocations to provide a total capacity of 4,085 dwellings until the end of the plan period. This requirement figure has been based on the St Helens SHMA (January 2019) which identifies a range of housing needs figures based on different economic scenarios. The requirement of 486dpa is based on 'Sensitivity Option 3, Economic Scenario 2'.
- 3.2. This is a significant reduction from the housing requirement identified within the St Helens Local Plan Preferred Options of 570 dwellings per annum, which was based on the adopted Core Strategy (2012). The Preferred Options Plan also identified a greater number of Housing Allocations. There were a total of 16 Housing Allocations identified within the Preferred Options Draft Plan and only 6 have been carried forward as Housing Allocations within the Submission Draft, whilst 1 has been allocated as Safeguarded Land and the remaining 9 have been removed from the Local Plan and are to remain as Green Belt land.
- 3.3. There has been some notable additions within the Submission Draft of the following large Housing Allocations:
- 4HA – *Land bounded by Reginald Road/Bold Road/Travers Entry/Gorse Lane/Crawford Street, Bold (Bold Forest Garden Suburb)* – 133ha, 480 dwellings within Plan period, 2988 capacity. This site was allocated as Safeguarded Land within the Preferred options (HS03).
 - 6HA – *Land East of City Road, Cowley Hill, Town Centre* – 31.09ha, 540 dwellings within the Plan period, 816 capacity.
 - 10HA - *Moss Nook Urban Village, Watery Lane, Moss Nook* – 26.74ha, 802 dwellings within Plan period, 802 capacity.

- 3.4. Land adjacent to the site subject to this submission, known as HA15 (Land South of Higher Lane and East of Rookery Lane, Rainford) within the Preferred Options Plan has been retained as a Housing Allocation for the Submission Draft:
- 8HA - *Land South of Higher Lane and East of Rookery Lane, Rainford* – 11.49ha, 259 dwellings within the Plan period, 802 capacity.
- 3.5. Within the Preferred Options Plan there was a total of 24 sites allocated as 'Safeguarded Land' to meet the longer-term housing needs beyond the plan period. This included the site in question at Land South of Higher Lane and West of Mill Lane (ref. HS20). Of those 24 sites designated as Safeguarded Land, only 4 were carried forward as safeguarded land within the Submission Draft. HS20 was removed from the Submission Plan.
- 3.6. There are only 8 sites for Safeguarded Land within the St Helens Submission Draft and notable additions include large sites with a high dwelling capacity, which includes:
- 3HS – *Former Eccleston Park Golf Club, Rainhill Road, Eccleston* – 49ha, 956 dwellings capacity.
 - 8HS – *Land South of A580 between Houghtons Lane and Crantock Grove, Windle* – 52.69ha, 1027 dwellings capacity.

Green Belt Review (December 2018)

- 3.7. As part of the preparation for the new Local Plan, St Helens Council identified that there was a shortfall of suitable land within its existing urban areas and in urban areas of near authorities to meet the Borough's housing needs. A Green Belt review was undertaken in 2018 which identified where development could be accommodated whilst causing least harm to the purposes of the Green Belt.

- 3.8. Within this Green Belt review, the site in question was considered for residential development (ref. GBP_019b Land south of Higher Lane, Rainford). The site was considered as part of a sub-parcel of a wider site, which included the land adjacent to the west (ref. GBP_019b). The site was reviewed with a potential capacity of 367 dwellings and was given an overall score of 3 (sites allocated were given a score of 6) and was therefore discounted.
- 3.9. The review indicates within the commentary on page 80 that although the site was proposed by the Council as a safeguarded site at LPPO stages, "*a number of constraints affect the sub-parcel that limit its suitability for new development*". It is noted that there are more sustainable sites which would meet the future housing needs of the Borough.
- 3.10. The constraints of the site noted within the Green Belt Review are as follows:
- *The sub-parcel is bounded by highways to the north and east, Rainford Industrial Estate to the south, and a band of mature trees to the west. However, it is considered to have a lower degree of visual enclosure than the neighbouring sub-parcel GBP_019a. It is also further away from the village core of Rainford, and is a significant distance from the nearest primary school and convenience shop (approx. 1.45km). Due to its location, development of the sub-parcel would not represent a sustainable spatial approach to meeting housing needs.*
 - *The sub-parcel has a Medium to High landscape and visual sensitivity, and is classed as mixed agricultural land including Grade 1.*
 - *UU has advised that a main surface water sewer and a pressurised water main (and associated easements) exist to the north and south of the sub-parcel, which would need to be afforded due regard in any development proposal. A buffer would be required alongside the south-west boundary of the sub-parcel, due to air quality and noise pollution issues related to the adjacent Rainford Industrial Estate.*

- *The 2018 SA (Sustainability Assessment) concluded that development of the parcel would have a mixed impact on the achievement of SA objectives, with a number of negative effects likely with regard to biodiversity, landscape sensitivity and access to education and health facilities.*

/4 RESPONSE TO SUBMISSION DRAFT LOCAL PLAN

4.1. PWA Planning support the removal of land to the south of Higher Lane and West of Mill Lane, Rainford from the Green Belt as the site represents a logical Housing Allocation to help meet the housing needs of the borough over the plan period. The reasoning for not including the site as either a Housing Allocation or Safeguarded Land within the Submission Draft Local Plan appears to be a result of the decision to reduce the overall housing requirement for the borough, and in doing so to focus on larger yet fewer strategic sites.

Housing requirement figure

4.2. It is the view of PWA Planning that the housing requirement as identified within the St Helens Submission Draft Local Plan is too low to support St Helens' growth aspirations. The significant reduction in the housing requirement figure, from the Preferred Options plan, conflicts with the earlier economic growth agenda of the Council.

4.3. Central to the NPPF is a presumption in favour of sustainable development, which is set out at Paragraph 11. It is stated that strategic policies as a **minimum** should provide for objectively assessed needs for housing. The standard method for assessing housing need is to ensure local authorities have a consistent starting point when understanding how many homes are needed in their local area. Planning Practice Guidance makes it clear that the standard method does not produce the housing requirement for the Local Authority.

4.4. The housing requirement figure of 486 dwellings per annum identified within the Submission Local Plan is only just above the standard methodology using the 2014-based Household Projections and latest affordability ratio, which is a figure of 482 (SHMA January 2019).

4.5. The NPPF has a strong focus on increasing the supply of new housing and Section 5 promotes the Government's objective to significantly boost the supply of new homes. The Submission Draft Local Plan which sets a housing requirement of just above the

standard method risks the Local Plan underdelivering on its housing requirements and would also not ensure the economic growth agenda of the Council can be achieved.

- 4.6. It is therefore considered that the plan is not sound as it fails to demonstrate adequate housing provision and delivery in order to meet the housing needs of the borough over the plan period.

Size of allocations

- 4.7. The significant reduction in the range and geographical spread of strategic housing sites in favour of a small number of much larger green belt releases within the Submission Draft Plan is not considered to be good practice.
- 4.8. The reliance on releasing fewer yet larger sites from the Green Belt may result in significant issues if some of these larger sites experience any delays and a slower build out rate than anticipated. The requirement for extensive surveys, remediation, comprehensive master-planning, or infrastructure improvements could lead to delays in their delivery and may have significant implications on the Local Authority meeting their housing requirements.
- 4.9. Paragraph 73 of the Framework states that local planning authorities should include a trajectory illustrating the expected rate of housing delivery over the plan period. Looking at the Housing Trajectory within the Submission Local Plan, there is an assumption that most of the allocated Strategic Housing sites will be developed within the plan period. As there is a requirement for the local planning authorities to monitor the progress of housing delivery to ensure that in the previous three years the delivery has not fallen below 95%, there is therefore a concern that if there are delays and a slower build out rate than expected, this would result in failing of the Housing Delivery Test.
- 4.10. As stated with paragraph 67 of the NPPF "*planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*". This includes both deliverable sites for years one to five of the plan

period as well as *"developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan"*. The NPPF supports the allocation of an appropriate mix of sites and highlights within Paragraph 68 that *"small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly"*.

- 4.11. It is therefore considered that the Local Plan should include a greater mix (scale / location) of sites to meet the meet the Local Plan's housing requirement and the housing needs of the Local Authority and the communities they serve. As NPPF Paragraph 11 states, plans should *"seek opportunities to meet the development needs of the area and sufficiently flexible to adapt to rapid change"*. The reliance on a smaller number of larger Housing Allocations would not ensure that any future changes would be accounted for and would not see the Borough's housing needs met.
- 4.12. As there has also been a reduction in the amount of Safeguarded Land identified within the Submission Draft Local Plan for larger and a fewer number of sites, this may require further green belt reviews sooner than anticipated and this would also make the Local Plan unsound.

Suitability of the site

- 4.13. The Green Belt Review conducted of the site concluded that there are constraints to the delivery of homes on the site. As discussed in depth within the representations submitted in response to the Preferred Options (Appendix 2), there would be no technical constraints preventing the delivery of the site. Although mentioned within the Green Belt Review, it has been demonstrated that there would not be any negative effects on the biodiversity or landscape sensitivity of the site, and it lies within a sustainable location for development with schools and health care facilities within walking distance of the site.
- 4.14. When testing the site against the purposes of including the site within the Green Belt, as stated within Paragraph 134 of the NPPF, the benefits of removing the site from the Green Belt would outweigh its continued inclusion as Green Belt land. The site would

lie adjacent to the Housing Allocation 8HA on the eastern edge of Rainford with the Rainford Industrial estate directly to the south of the site. Therefore, it would not result in unrestricted sprawl of large built up towns nor towns merging into one another. In terms of the visual enclosure of the site, the site is considered to be well contained in landscape and visual terms, with the site bound by the industrial estate to the south which extends along Mill Lane.

- 4.15. Seddon Homes are working with the landowners to support the removal of the site from the Green Belt and the delivery of a residential-led scheme which can begin to deliver homes to meet the needs of all sections of the community within the early years of the plan period. The allocation of land at the site in question offers a very sensible means of achieving a better balance and increasing supply in the short and medium term and would help to address the unsoundness evident in the current plan.

/5 CONCLUSIONS

- 5.1. PWA Planning is retained by Mr & Mrs Berry (landowners) and Seddon Homes (prospective developers) to make representations on the St. Helens Local Plan 2020 – 2035 Submission Draft.
- 5.2. PWA Planning are of the opinion that the allocation of the site at land located to the south of Higher Lane and to the west of Mill Lane, Rainford should be allocated for housing within the emerging Local Plan and is consistent with the NPPF in terms of providing deliverable and developable land to assist St Helens in meeting its housing need during the plan period.
- 5.3. In summary, in response to the St Helens Local Plan Submission Draft, it is considered the following:
- The significant reduction in housing requirement figure conflicts with the Council’s earlier economic growth agenda;
 - The significant reduction in the range and geographical spread of housing sites in favour of a small number of much larger green belt releases is not good practice;
 - The reduced amounts of safeguarded land may require further green belt reviews sooner than anticipated;
 - The allocation of the site offers a sensible means of achieving a better balance and increasing supply in the short and medium term;
 - Seddon Homes are working with the landowners to see the land released from the Green Belt and the delivery of homes to meet all needs of the community within the early years of the plan period;
 - Technical and environmental reports have shown that there are no insurmountable barriers to the delivery of the site for housing and there are no

constraints preventing the development of this site in conjunction with the Housing Allocation 8HA.

- 5.4. Given the importance of ensuring that the St Helens Local Plan 2020 - 2035 is able to identify an adequate supply of housing for the plan period, PWA Planning support the removal of this site from the Green Belt and its allocation for housing development.



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