

Hearing Statement

St Helens Local Plan Examination

Matter 4 – Hearing Session 5

Allocations, Safeguarded Land and Green Belt Boundaries Rainford, Billinge,
Garswood and Haydock

Prepared on behalf of Canmoor Developments Ltd

May 2021

1 Introduction

- 1.1 This Statement has been prepared on behalf of Canmoor Developments Limited in respect of the St Helens Local Plan 2020-2035, which has been submitted to the Secretary of State for Examination.
- 1.2 This document seeks to make a series of representations on the Local Plan and the evidence base that underpins it; specifically, in response to the Inspectors Matters, Issues and Questions.
- 1.3 Canmoor Developments Ltd are promoting two sites within St Helens for release from the Green Belt to meet the employment needs of the Borough over the next plan period. These sites are located adjacent to the Haydock Lane Industrial Estate and are identified as employment site allocations 5EA and 6EA in the Submission Local Plan. The proposed allocations of these sites and their release from the Green Belt are supported, due to the lack of available land within St Helens to accommodate new employment premises.
- 1.4 Responses to the relevant questions that will form the basis of the Hearing Session 5 regarding Matter 4 and the proposed allocations of land at Haydock are set out below where these relate to sites 5EA and 6EA.

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- 2 Issue 3: Florida Farm North (2EA), land north of Penny Lane (3EA), land south of Penny Lane (4EA), land to west of Haydock Industrial Estate (5EA), land west of Millfield Lane, Haydock (6EA), land at Florida Farm, Haydock (2HA), and land north-east of Junction 23 (M6), Haydock (2ES)

Questions

20. *Do the Green Belt assessments support the allocation of Sites 4EA, 5EA and 6EA and Site 2HA and the safeguarding of Site 2ES and demonstrate exceptional circumstances for the removal of the land from the Green Belt?*
- 2.1 The Green Belt assessments are considered to support the allocation of sites 5EA and 6EA and identify that removal of these sites from the Green Belt would not compromise the function of the Green Belt in this area.
- 2.2 Site 5EA is a logical extension of the Haydock Industrial Estate and is relatively self-contained, especially now that development of site 2EA has completed, which establishes a defined urban boundary to the west of the site. Planning application ref P/2017/0920/FUL that sought to secure permission for development of this site in advance of the allocation being confirmed, incorporated a landscape strategy that would minimise the visual influence of the development on the surrounding area and provide screening of the development. The principles of the landscape strategy were agreed by the Council as being appropriate to mitigate the visual effects of the development and minimise any impact on the openness of areas of adjoining Green Belt.
- 2.3 Site 6EA is immediately adjacent to site 5EA and site 2EA and is also relatively self-contained, with development to the west and east. Liverpool Road provides a strong, defined boundary to the site to prevent any further incursion of development to the north such that a gap can be retained to separate the built-up areas of Haydock and Garswood. A strategic landscape buffer is proposed to the northern site boundary along Liverpool Road to provide screening of any development within the site and to mitigate the visual impacts of the development when viewed from the adjoining areas of Green Belt.
- 2.4 There is a limited amount of land available to accommodate new employment premises within St Helens. The most recent Updated Employment and Housing Land Supply Position prepared by St Helens (document ref: SHBC007) identifies that there is only 4.04 Ha of employment land available, of which 3.46Ha is made up by the site on Kilbruck Lane that is known by its marketing name of ARC 130. This is now under construction and pre-let to Law Distribution, understood to be on a 15 year lease. It is therefore considered that this land is no longer available, which reduces the available employment land in St Helens to only 0.58 Ha.
- 2.5 There has been a shortage of land available within St Helens for a number of years and there is now less than 1 Hectare of land available to accommodate occupier's requirements. St Helens Council's Objectively Assessed Need identifies the need for up to 239 Ha of land to be made available (EMP001: Employment Land Needs Study, Addendum January 2019), and it is considered that exceptional circumstances exist as there are no other areas of land available within the urban envelope that are not designated as Green Belt that can come forward to accommodate these development needs over the next plan period. Of those sites initially identified for release from the Green Belt as potential allocations, sites 2EA, 3EA and 10EA have already been developed and accommodate new premises that are occupied, demonstrating the high levels of take up for new employment premises in St Helens and the Haydock area in particular.

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- 2.6 The National Planning Policy Framework requires planning policies to be responsive and flexible to the needs of business with significant weight placed on supporting economic growth so that businesses '*...can invest, expand and adapt.*' (paragraph 80).
- 2.7 In respect of the location of employment land, paragraph 82 clarifies that policies should '*...recognise and address the specific locational requirements of different sectors.*' Including for '*...storage and distribution operations at a variety of scales and in suitably accessible locations*'.
- 2.8 The existing employment area at the Haydock Industrial Estate is a successful location based in large part on its excellent proximity to the strategic highway network. The provision of additional employment land at this location will therefore provide the right type of land in the right location to meet the needs of business and provide the right conditions to secure investment into St Helens and contribute to Economic Growth. The allocation of land at Haydock in the form of allocations 5EA and 6EA therefore meets the requirements of the NPPF and would not compromise the function of the Green Belt as a strategic gap would still exist and an appropriate strategy can be adopted to minimise any visual effects resulting from the development.
- 21. *If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?***
- 2.9 As noted above, the amount of available employment land within St Helens is considered to be overestimated as the land at Kilbruck Lane is no longer considered to be available. A number of proposed employment site allocations have also now been developed and are no longer available. The availability of employment land, take up rates for new employment premises and the objectively assessed need identified in the Council's evidence base all demonstrate that exceptional circumstances exist to justify the release of land from the Green Belt to meet future needs over the plan period.
- 22. *Should 2ES be allocated rather than safeguarded so that it can contribute to meeting needs in the Plan period?***
- 2.10 No comment
- 23. *Is the configuration and scale of the allocations and safeguarded land justified taking into account development needs and the Green Belt assessments?***
- 2.11 Sufficient land needs to be provided to meet the requirements of the NPPF. The allocation of sites 5EA and 6EA form a logical extension of the built-up area boundary making use of the locational characteristics of the area to support high quality employment uses and support economic growth. Sites are needed to accommodate large and small units. Take up rates of available employment land has been high due to the limited supply of land in St Helens and the wider area. Sites 5EA and 6EA offer flexibility to be developed for a range of different sized units, including the potential to accommodate larger units of 25,000 sq m + as well as smaller units to meet future demands of the market. The exact unit type will be confirmed in any application to meet market requirements at that time.
- 2.12 The allocation of additional land in the vicinity of the Haydock Lane Industrial Estate will play to the area's strengths, which include existing infrastructure to serve new development, proximity to the strategic road network and access to population centres to contribute to the workforce of new employment premises.

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24. *Would the adverse impacts of developing Sites 4EA, 5EA and 6EA and Site 2HA (Green Belt impacts, landscape impacts, highway safety, flood risk, agricultural land, air quality) outweigh the benefits?*

- 2.13 The potential impacts of development of sites 5EA and 6EA can be mitigated through appropriate measures relating to highways, landscape flood risk air quality etc. The development of the sites would secure substantial economic benefits to contribute to economic growth in the area, allowing St Helens to be more competitive with surrounding areas that benefit from greater availability of employment land.

Site 5EA

- 2.14 Site 5EA was the subject of a planning application (ref P/2017/0920/FUL) that was considered by the St Helens Planning Committee in 2019. The application was recommended for approval but the committee refused it on the grounds that very special circumstances had not been proven to justify development within the Green Belt. All other matters were considered acceptable. The planning officers determined that the development would secure economic benefits to the area and the sustainable drainage strategy would contribute to the reduced risk of flooding downstream of the Clipsley Brook through improving on Green Field run off rates.

- 2.15 Access to the site from Haydock Lane was considered to be acceptable and no mitigation was necessary to the existing highway network. Whilst the development would have an impact upon the openness of the Green Belt, the proposed landscape screening would screen views towards the development such that any harm to the Green Belt could be reduced to an acceptable level. This application was considered prior to the construction of the employment units at site 2EA, which have altered the existing visual context and have a greater urbanising influence on this area of St Helens, therefore the impact of any development at this site when read in conjunction with these new employment units, would be lower than when assessed in the documents that supported this application.

Site 6EA

- 2.16 Site 6EA can be brought forward to accommodate employment units of varying sizes to meet occupier requirements and contribute to the economic growth of St Helens. Work is ongoing to prepare a masterplan for the site, in accordance with the draft site allocation, to minimise any impacts of the development on the local area. The drainage strategy for the site intends to improve upon Green Field Run off to limit discharge of water into the Clipsley Brook and adopt a sustainable drainage measures to reduce flood risk downstream, which will be a benefit of any development. The masterplan will identify an appropriate means of access to the site that will take highway safety issues into account and landscape buffers around the site will be provided to screen the development, provide areas for biodiversity enhancements and reduce impacts of the development when viewed from the surrounding areas of Green Belt.
- 2.17 Measures to minimise any potential impacts including those relating to Air Quality from development at these sites can be incorporated into the proposals, particularly as technology for low/zero emission vehicles advances and occupiers now require greater energy efficiency and lower running costs from new premises.
- 2.18 The Evidence Base that supports the Local Plan identifies that there is a lack of available land coming forward for development and there is a clear need for additional land to be allocated for employment use over the plan period.

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25. Are the requirements for Sites 4EA, 5EA, 6EA, 2HA and 2ES within Policies LPA04.1 and LPA05.1 and Appendices 5 and 7 (Site Profiles) positively prepared and effective?

- 2.19 The requirements for sites 5EA and 6EA are generally considered to be positively prepared and effective in allowing the sites to come forward to meet the objectives of the Local Plan and support economic growth and meet businesses needs in St Helens. Any requirements should allow sufficient flexibility for alternative approaches to come forward as part of the preparation of planning applications for the sites to avoid a restrictive approach that could preclude other acceptable forms of development coming forward.
- 2.20 For example, it is proposed that the requirements regarding access for both sites is amended to become more flexible as set out in the response to question 26 below.

26. How should the requirements for Sites 5EA and 6EA be modified to provide clarity on access arrangements?

- 2.21 The Transport Assessment that supported planning application P/2017/0920/FUL, that related to site 5EA demonstrated that a satisfactory form of access can be provided from Haydock Lane into the site to serve the proposed quantum of development on this site. The principles of which were agreed by the Highway Authority. It is considered that this form of access continues to be suitable to allow development of this site to proceed. The form of access will be considered in detail in any future planning application.
- 2.22 In respect of detailed arrangements for access to Site 6EA, these should remain flexible to allow for the detailed assessment of potential access routes into the site as part of the preparation of the layout/masterplan. Setting detailed requirements at this stage will not allow for issues to be fully reviewed to identify the best approach taking relevant stakeholders views and site constraints into account. The provision of a link to connect sites 5EA and 6EA across the Clipsley Brook is not considered necessary and there are other opportunities to provide a suitable form of access to the site without needing to cross this watercourse.
- 2.23 Detailed assessment work has been undertaken to demonstrate that a priority access with ghost island arrangement can be safely accommodated into the site from Millfield Lane and there are potential efficiencies that can be accommodated at the Tithebarn Junction to the north of Millfield Lane where this connects to Liverpool Road to increase capacity at this junction. Other options, if required, can also take the form of potential connections from Liverpool Road.

Proposed amendment to access requirements for Sites 5EA and 6EA

- 2.24 To secure the required level of flexibility that will allow development of the sites to come forward in an appropriate manner, the following amendments are proposed:

Site 5EA

The provision of safe highway access following detailed assessment of the surrounding highway network, including an appropriate connection off Haydock Lane, that could potentially also serve employment site allocation 6EA unless it is demonstrated to the satisfaction of the Council that this is not needed to enable a suitable form of development within site 6EA.

Site 6EA

The provision of safe highway access following detailed assessment of the surrounding highway network, potentially including: improvements to the highway layout and signalling equipment at the

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junction of Millfield Lane and Liverpool Road, access from Liverpool Road and/or an appropriately designed connection from Haydock Lane, to also serve employment site allocation 5EA (or such other appropriate arrangements for access that are agreed with the Council);

27. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities within Tables 4.1, 4.5 and 4.8 justified and effective?

2.25 The site areas provided for allocations 5EA and 6EA are considered to reflect the amount of land available for development and the proposed uses for these sites is supported, although future flexibility for Class E uses (former B1c, light industrial) may also be required by future occupiers. Light Industrial uses are considered appropriate for these sites. Operations under this use class should also be included as a prospective use for sites 5EA and 6EA.

28 Will infrastructure to support the allocations, including improvements to Junction 23 (M6) be delivered at the right time and in the right place.

2.26 The Transport Assessment that supported planning application ref P/2017/3920/FUL identified that no additional infrastructure was needed to support development of Site 5EA. The conclusions of this Transport Assessment, the principles of which were agreed with both the Highway Authority and Highways England, are still considered to be valid.

2.27 Future development of site 6EA will assess any impacts on the strategic highway network to establish whether any improvements are needed and either provide these as site specific development works or review with the Council and other stakeholders whether any financial contributions may be needed to support strategic infrastructure improvements.

29 Are there any barriers to Site 2HA coming forward as anticipated by the housing trajectory?

2.28 No comment.