

# Hearing Statement on behalf of Wainhomes (North West) Ltd

In relation to: Matter 4 – Session 5 - Allocations, Safeguarded Land and Green Belt Boundaries

for Wainhomes (North West) Ltd

Emery Planning project number: 17-005





Project : 17-005 Hearing : Matter 4

Client : Wainhomes (North West)

Ltd

Date : May 2021

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#### 1. Introduction

- 1.1 Emery Planning is instructed by Wainhomes (North West) Ltd to attend the St Helens Borough Local Plan Examination. Wainhomes (North West) Ltd has an interest in the following sites:
  - Land off Camp Road and Strong Road, Garswood;
  - Land off Lords Fold, Rainford; and,
  - Land off Winwick Road, Newton-le-Willows.
- 1.2 This hearing statement sets out our response to the Inspector's Matters, Issues and Questions in relation to Matter 4 Session 5 Allocations, Safeguarded Land and Green Belt Boundaries. It should be read in conjunction with our detailed representations to the Submission Version of the Plan and our other Hearing Statements submitted to this Examination.



#### 2. Session 5 - Issue 4: Other Green Belt boundaries

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

- 2.1 Under this Issue we refer to two of our client's sites, these being:
  - Land off Camp Road and Strong Road, Garswood; and,
  - Land off Lords Fold, Rainford.
- 2.2 Paragraph 135 of the NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The release of Green Belt land for housing development is necessary in order to meet unmet and future housing needs of the Borough. This comprises exceptional circumstances for the purposes of the NPPF. Subject to the conclusion of Matters 2, 3 and 5, we consider that further Green Belt alterations are justified.
- 2.3 However our representations set out our position on both the above sites and why both should be released from the Green Belt. It is not the principle of Green Belt release that is our objection, but how the allocations and safeguarded land has been decided on when relying on the evidence base. Rather than repeat our detailed submissions here we will speak to our representations as to why the Green Belt boundaries at Rainford and Garswood are not justified based on the evidence base.
- 2.4 For example, the omission of our client's sites as housing allocations or safeguarded land are not justified through the available evidence base for the Submission Draft Plan. This includes our concern on the changes to the evidence base, for example the 2016 St Helens Green Belt Assessment identified our client's site at Garswood with a score of 'Low' with regard to safeguarding the countryside from encroachment. Yet in the 2018 Green Belt Review this score was changed to 'Medium' and the land to the east which is more open is given a Low score. These issues raise a general point on whether the Green Belt changes are justified. As we assess below Garswood is one example.

## Issue 2: Land to south of Billinge Road, Garswood (1HA) and land to south of Leyland Green, Garswood (1HS)

2.5 With regard to the land at Camp Road and Strong Road, Garswood we consider that our client's performs better than "Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road" and it should be reinstated as safeguarded land accordingly, or otherwise as a housing allocation. The reasons are set out in Section 7 of our representations. Our overall concern is the interpretation of the evidence base to conclude and justify the release of 1HA and 1HS from the Green Belt yet reinstate our client's site back into the Green Belt from its allocation as safeguarded land at the Preferred Options stage.

