



ST HELENS
BOROUGH COUNCIL

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

**DEVELOPING THE SPATIAL STRATEGY
BACKGROUND PAPER**

OCTOBER 2020

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1 Introduction

- 1.1 This Background Paper is one of several that have been prepared by the Council. It will provide evidence for the forthcoming Examination in Public of the St Helens Borough Local Plan 2020-2035 (the SHBLP).
- 1.2 This Paper briefly summarises:
- contextual information about the Borough of St Helens (see Section 2);
 - the legal and policy context within which the SHBLP has been prepared (see Section 3);
 - the evidence base that has informed the preparation of the SHBLP (see Section 4);
 - the key stages over which the SHBLP has developed, including how the Plan has evolved in response to relevant evidence, public consultation, cooperation with other public bodies, changing national policy and the sustainability and other appraisal processes (see Section 5);
 - alternative housing and employment growth options that have been considered by the Council (see Sections 6 and 7); and,
 - a summary of the reasons for reviewing Green Belt boundaries to accommodate development (see Section 8).
- 1.3 This Paper should be read in conjunction with other documents prepared by the Council. These include:
- the Council's background papers covering climate change¹, housing²; employment land³; the strategic site at Parkside⁴; and heritage⁵ (documents ref SD028; SD025; SD022; SD024 and SD023);
 - the position statement on the proposed Bold Garden Suburb⁶ (document ref SD027);
 - the Duty to Cooperate statement⁷ (document ref SD009);
 - the Council's legal⁸ and soundness⁹ compliance checklists (documents ref SD017 and SD016); and
 - other evidence base documents (see section 4 of this Paper).

¹ SD028, Climate Change Background Paper, October 2020

² SD025, Housing Need and Supply Background Paper, October 2020

³ SD022, Employment Land Need and Supply Background Paper, October 2020

⁴ SD024, Parkside SRFI Background Paper, October 2020

⁵ SD023, Heritage Background paper, October 2020

⁶ SD027, Bold Garden Suburb Position Statement, October 2020

⁷ SD009, St Helens Local Plan 2020-2035, Duty to Cooperate Statement, October 2020

⁸ SD017, Legal Compliance Checklist

⁹ SD016, Soundness Self-Assessment Checklist

2 The Borough of St Helens

- 2.1 The following points represent a summary of the spatial profile of St Helens Borough, set out in Chapter 2 of the SHBLP.

Sub-regional Context

- 2.2 St Helens Borough enjoys a strategic position at the heart of the North West; an example of which, in terms of the economy and transport, is its close links with the rest of the Liverpool City Region, West Lancashire and Wigan. It shares a housing market with Halton and Warrington.

Place

- 2.3 The urban form of St Helens Borough can be traced back to its history of coal mining, railways and glass making. St Helens, Haydock, Newton-le-Willows and Rainhill all form substantial urban areas. Within the southern part of the Borough several communities that originally served the coal mining industry have merged to form part of the core urban area. The Borough also contains a number of free standing villages and hamlets.
- 2.4 The decline of traditional industries in recent decades has created a legacy of derelict and (in some cases) contaminated land.

Population Trends

- 2.5 The resident population of St Helens Borough (180,585 in 2019) is growing steadily, albeit at a slower rate than for the North West and for England. The Borough has an aging population with a smaller proportion of people of working age than exists in England as a whole.

Economy and Skills

- 2.6 St Helens Borough is ranked as the 26th most deprived out of 326 local authorities in England. The Borough has relatively low economic activity rates, levels of pay and educational attainment. Levels of dependency on benefits within the Borough are above regional and national averages. These issues are concentrated most significantly within the urban core of St Helens.
- 2.7 Notwithstanding these issues the Borough has many economic strengths and opportunities and has accommodated several major new employment developments in recent years. Due to its location and excellent transport connectivity the Borough has great potential to increase its economic competitiveness, including in the growing logistics sector.

Housing

- 2.8 The housing stock of the Borough has a higher percentage of semi-detached houses and a lower percentage of detached houses than exists in the North West as a whole. Whilst a number of substantial new build housing projects have taken place in recent years there has also been some continued

clearance of older stock. Affordability of market housing for sale is an issue in the Borough with lower quartile house prices over four times greater than the lower quartile household income.

Health and Wellbeing

- 2.9 Life expectancy in St Helens Borough, recently measured at 77.76 years for males and 81 years for females, is considerably below the national averages. Furthermore, over 72% of the 18+ adult population in the Borough – considerably higher than the national average (62%) - is estimated to be classed as overweight or obese. This has been identified as a growing problem, in particular for children and young adults. In Year 6, 23.0% of children are classified as obese, worse than the average for England (20%).¹⁰ Crime rates in the Borough, however, have reduced in recent years and are performing relatively well compared to other local authority areas with similar characteristics.

Transport

- 2.10 St Helens Borough enjoys good levels of accessibility to the M58, M62 and M6 motorways and has 10 rail stations which provide regular connections to neighbouring towns and cities. Nevertheless, a need has been identified to improve aspects of the transport network. Highways in the Borough are under increasing pressure as traffic flows continue to rise. The Council is working closely with infrastructure and service providers to address these issues, and to consider opportunities for improving and expanding the sustainable transport network (including walking, cycling and public transport).

Town Centres

- 2.11 St Helens town centre plays an important sub-regional role providing a range of retail and other services. This is complemented by Earlestown town centre (within the town of Newton le Willows) and a range of smaller district and local centres. A key challenge is for the town and other centres to diversify their role in response to changing economic circumstances, including competition from retail parks and internet shopping.

Heritage Assets

- 2.12 The Borough boasts a varied and unique built environment, based upon its history connected with the railways, mining, glass and other industries. Its heritage assets include: 148 Listed Buildings, 12 Scheduled Monuments, one Registered Battlefield, eight Conservation Areas and three Registered Parks and Gardens. There are also other areas of archaeological interest and above-ground assets of local interest.

¹⁰ Public Health England, St Helens Local Authority Health Profile 2019, (03,03,2020), <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E08000013.html?area-name=St.%20Helens>

Green Infrastructure

- 2.13 Despite the perceived urban character of the Borough, over half of its area is rural or semi-rural in nature. The Borough benefits from an extensive network of open countryside and green spaces, much of which provides opportunities for formal or informal recreation. The Borough also contains valuable wildlife habitats. The Sankey river catchment covers much of the Borough.
- 2.14 Substantial improvement programmes have been undertaken, for example at Bold Forest Park in the south of the Borough, to improve the landscape and enhance public accessibility and recreational opportunities. The Mersey Forest and related initiatives have helped to secure the environmental regeneration of parts of the Borough.

Key Issues

- 2.15 Based upon relevant evidence and the feedback from consultation as the SHBLP has developed, Chapter 2 of the SHBLP Submission Draft (document ref SD001) identifies that the Plan should seek to:
- i. deliver sustainable communities;
 - ii. strengthen and diversify the local economy;
 - iii. deliver sustainable development;
 - iv. meet local housing needs;
 - v. meet employment needs;
 - vi. protect and where possible enhance the town, district and local centres;
 - vii. manage the rural economy;
 - viii. improve health;
 - ix. maximise accessibility and social inclusion;
 - x. sustain population recovery;
 - xi. reduce crime;
 - xii. encourage the use of sustainable transport;
 - xiii. manage and enhance the environment;
 - xiv. recognise and support community and cultural facilities; and,
 - xv. manage river catchments and enhance biodiversity.

3 Legal and Policy Context

3.1 This section briefly summarises the legal and policy context within which the SHBLP has been prepared.

National Legislation

- 3.2 The SHBLP has been prepared within the legislative framework provided by the Planning and Compulsory Purchase Act (PCPA) 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). These documents set out requirements relating to the content of local plans, sustainability appraisal, community engagement and the duty to cooperate with neighbouring local authorities and other public bodies. Other legislation is also relevant, for example the Planning Acts 1990 and 2008 and the Conservation of Habitats and Species Regulations 2017.
- 3.3 The Council's Soundness and Legal Compliance Checklists (documents ref SD016 and SD017) and Duty to Cooperate Statement (document ref SD009) set out how the Council has complied with relevant legal requirements in preparing the SHBLP.

National Policy and Guidance

- 3.4 Relevant national policy is mainly set out in the National Planning Policy Framework (NPPF).
- 3.5 Paragraph 7 of the NPPF confirms in summary that the purpose of the planning system is to contribute to the achievement of sustainable development, whilst paragraph 8 defines a set of overarching economic, social and environmental sustainability objectives to be pursued. Paragraph 11 of the NPPF requires local plans to apply a presumption in favour of sustainable development and defines what is meant by this. The pursuit of sustainable development in accordance with the NPPF has formed the guiding principle for the development of the SHBLP.
- 3.6 Section 3 of the NPPF sets out specific policy concerning plan-making, including tests of soundness, which require that plans must (in summary) be:
- positively prepared;
 - justified;
 - effective; and,
 - consistent with national policy.
- 3.7 The second of the tests of soundness referred to above requires that the SHBLP must constitute "... *an appropriate strategy, taking into account the reasonable alternatives ...*". Sections 6 and 7 of this Paper set out the reasonable alternative options that were considered in relation to housing and employment development and why the proposed strategy is 'appropriate' in relation to those matters as required by the NPPF.

- 3.8 The other sections of the NPPF include (for example) the Government’s emphasis on delivering a sufficient supply of homes (section 5 of the NPPF) and on building a strong, competitive economy (section 6 of the NPPF).
- 3.9 An important aspect of the NPPF in the context of St Helens is section 13 “protecting Green Belt land”. This explains that the government attaches great importance to Green Belts and confirms (in paragraph 136) that “*once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans ...*”. Footnote 6 of the NPPF (which is linked to the definition of sustainable development referred to above) explains that the policies of the NPPF that protect areas of particular importance include policies relating to Green Belt.
- 3.10 Whilst the SHBLP aims to continue the Council’s long standing commitment to promoting urban regeneration and the re-development of brownfield sites in the Borough’s urban areas, it also proposes to remove some land from the Green Belt. Section 8 of this Paper summarises why the approach to Green Belt issues in the SHBLP complies with the NPPF.
- 3.11 In preparing the SHBLP, the Council has also taken into account all other relevant national policy and guidance documents prepared by the Government. These include, for example:
- Planning Policy for Traveller Sites (DCLG, 2015);
 - “National Planning Policy for Waste” (DCLG, 2014);
 - National Policy Statements covering various forms of nationally significant infrastructure; and,
 - The national on-line [Planning Practice Guidance \(PPG\)](#), which sets out supporting guidance on a wide range of planning topics.

Sub-regional Context

Liverpool City Region Spatial Development Strategy

- 3.12 St Helens forms one of 6 local authorities within the Liverpool City Region. The Liverpool City Region Combined Authority (LCRCA) is a joint entity that has played a key role in joint working on planning issues (see the Council’s Duty to Cooperate Statement for further details).
- 3.13 The LCRCA is currently (as at October 2020) in the early stages of preparing the Liverpool City Region Spatial Development Strategy (the LCRSDS). Whilst the LCR SDS will be a statutory document it is not sufficiently advanced to have had any substantive influence on the SHBLP. The second stage of consultation relating to vision and objectives, along with approaches to several key policy areas is expected to take place in late 2020.
- 3.14 The LCR Combined Authority is also responsible (in its role as Integrated Transport Authority) for preparing statutory transport plans for the Liverpool

City Region, and has prepared a wide range of other strategies, for example covering housing, the economy and skills and sustainable energy. These documents have all been taken into account by the Council as it prepared the SHBLP.

Greater Manchester Spatial Framework (GMSF)

- 3.15 Wigan, immediately to the north east of St Helens, is within the area that will be covered by the Greater Manchester Spatial Framework (GMSF). Public consultation has taken place on the emerging GMSF, most recently in early 2019. The GMSF has been prepared (to date) as a joint development plan document. It is envisaged that the GMSF will be subject to a further round of statutory consultation before it is submitted to the Inspectorate for examination. This is currently scheduled to take place in November 2020.

Local Plans of Neighbouring Authorities

- 3.16 The local planning authorities that adjoin St Helens all have existing recently adopted local plans in place or are preparing new plans. Halton has prepared a Local Plan that is currently at Examination in Public (as at October 2020) and Warrington published a Proposed Submission Draft Plan in 2019 (both of which are strongly linked to St Helens in terms of issues such as housing, economic development and transport). However, in October 2020 Warrington Borough Council decided to pause work on its Local Plan. Warrington Borough Council have indicated that they hope to be able to progress with their Local Plan in the summer of 2021.
- 3.17 West Lancashire Borough Council have also recently announced that they are pausing work on preparing their new Local Plan whilst Wigan will be covered by the emerging Greater Manchester Spatial Framework (see paragraph 3.15 above). Liverpool City Council has prepared a local plan that is currently (as at October 2020) at its Examination in Public stage.

Cooperation With other authorities in preparing the SHBLP

- 3.18 The Council has cooperated extensively with other local authorities in preparing the SHBLP. Further details are set out in the Council's Duty to Cooperate Statement (document ref SD009); and in Statements of Common Ground covering the Liverpool City Region and Warrington (documents ref SD010 and SD012). Key outcomes of this process are as follows:
- None of the neighbouring districts have identified a need for St Helens Borough to accommodate any of their housing development needs;
 - No spare site capacity has been identified in any neighbouring local authority areas to accommodate any of the housing needs arising in St Helens;
 - A need has been identified within the Liverpool City Region as a whole (including St Helens Borough) to accommodate the growth of the logistics and warehousing sector (associated with underlying economic

trends and the growth of the port of Liverpool), with a particular focus on the need for large scale units of over 9,000m²;

- Warrington Council has identified scope for a site at Omega South West within St Helens Borough to be developed to help meet its employment needs; and
- All of the immediately neighbouring districts to St Helens Borough have (due to restrictions on the supply of land in their existing urban areas) recently undertaken or are in the process of undertaking Green Belt reviews to meet their development needs (see Section 8 and Appendix 1 of this Paper for details).

The Development Plan for St Helens

3.19 As at October 2020 the adopted Development Plan for St Helens comprises:

- the St Helens Local Plan: Core Strategy (adopted in 2012);
- the remaining ‘saved policies’ of the St Helens Unitary Development Plan (the UDP - adopted in 1998);
- the Merseyside and Halton Joint Waste Local Plan (adopted in 2013);
- the Bold Forest Park Area Action Plan (adopted in 2017); and
- an adopted Policies Map.

3.20 The SHBLP will, once adopted, replace the Core Strategy and the remaining ‘saved policies’ of the St Helens UDP. However, it will not replace the Bold Forest AAP or the Joint Waste Local Plan. The SHBLP has therefore been developed to dovetail with the latter 2 documents.

3.21 Under recent changes to planning legislation, adopted development plans must be reviewed at least once every 5 years. As at October 2020, the Liverpool City Region authorities are assessing the approach to be taken to reviewing the Joint Waste Local Plan. That process is outside the scope of the SHBLP and will be undertaken separately.

3.22 Whilst the Core Strategy will be replaced by the SHBLP, the underlying strategy of the SHBLP has remained consistent with the Core Strategy (which is focussed on urban regeneration and the re-use of brownfield land). The Core Strategy was prepared in accordance with the former North West Plan: Regional Spatial Strategy for the North West (RSS)¹¹, before the RSS was revoked in 2013. This meant, for example, that the housing requirement of 570 dwellings per annum (dpa) in the Core Strategy was in accordance with that set by the RSS.

¹¹ North West of England Plan Regional Spatial Strategy to 2021, Government Office for the North West 2008.

Neighbourhood Plans

- 3.23 Planning legislation contains powers for parish councils or other designated community bodies to prepare neighbourhood plans. Whilst the Council has publicised information about the relevant procedures, no neighbourhood plans have been completed or are currently being prepared in St Helens.

Other Local Policy Documents

- 3.24 The SHBLP has been prepared in the context of a wide range of other local strategies. These include (for example): the St Helens Council Plan 2018/2020¹²; various housing strategy documents; the Sankey Valley Action Plan 2018¹³; and the Mersey Forest Plan¹⁴. Local policy documents are referred to where relevant in the SHBLP.

¹² <https://www.sthelens.gov.uk/media/7841/sthelens-council-plan-2018-20fv.pdf>

¹³ <http://moderngov.sthelens.gov.uk/documents/s75485/Sankey%20Catchment%20Action%20Plan%20Final%20Version.pdf>

¹⁴ <https://www.merseyforest.org.uk/about/plan/>

4 Evidence Base

4.1 The Council has prepared or has participated in evidence studies to underpin the SHBLP. These cover a wide range of topics including the following:

- housing need and land supply;
- employment land needs and land supply;
- retail and leisure;
- transport;
- infrastructure;
- gypsy and traveller accommodation needs;
- economic viability;
- Green Belts;
- open space, sports and recreation;
- wildlife sites;
- landscape and woodland;
- flood risk;
- built environment;
- minerals;
- sustainability; and
- consultation outcomes.

4.2 The relevant evidence base documents are referred to as necessary in the SHBLP policies and in the following sections of this Paper. A list of relevant evidence base studies is attached to the Council's submission letter to the Planning Inspectorate (document ref SD029).

Sustainability Appraisal and Habitats Regulation Assessment

4.3 A key role of local plans is to promote sustainable development. This means promoting social progress that meets the needs of everyone; effective protection of the environment; prudent use of natural resources; and high levels of economic growth and employment.

4.4 To ensure that the SHBLP is truly sustainable it has been subject to a robust process of Sustainability Appraisal (SA) as it has been prepared, which has covered the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004¹⁵. As required by relevant legislation, the SHBLP has also been subject to a process of Habitats Regulation Assessment as it has been prepared. This has assessed the effects of the SHBLP on

¹⁵<https://www.legislation.gov.uk/ukksi/2004/1633/contents/made>

certain areas in the Liverpool City Region that have been recognised at the European level for their nature conservation significance.

- 4.5 Sustainability Appraisal and Habitats Regulation Assessment documents have been produced at key stages of Plan preparation and have addressed the overall Plan strategy, individual policies and potential site allocations.

5 Key Stages in the Development of the Plan

The Decision to Prepare a New Local Plan (November 2015)

- 5.1 The decision to prepare a new local plan for St Helens Borough was made by the Council's Cabinet on 18 November 2015. The following paragraphs summarise how the strategy of the SHBLP subsequently developed, taking account of changing national policy, relevant evidence, the sustainability and other appraisal processes and the feedback from public consultation.
- 5.2 When the St Helens Local Plan Core Strategy was adopted in 2012, the Council intended to supplement it with a new Site Allocations Development Plan Document (DPD) and a Sustainable Development DPD. However, when the decision to prepare a new local plan was made in 2015, it was also determined that the new Plan should completely replace the Core Strategy, and that matters previously to be addressed in the Site Allocations and Sustainable Development DPDs should instead be covered by the new Local Plan.
- 5.3 The decision to replace the Core Strategy was taken largely due to the existence of updated evidence concerning development needs and to changes in national policy. Further details are set out in the report to Cabinet in November 2015 (document ref LPI011).
- 5.4 The Council has undertaken 3 key consultation stages in preparing the SHBLP, as follows:
- Local Plan Scoping consultation (January 2016);
 - Preferred Options consultation (December 2016/January 2017); and
 - Publication of Submission Draft Plan (January/May 2019).

Local Plan Scoping Consultation (January 2016)

- 5.5 The St Helens Local Plan Scoping Consultation Document (document ref LPI001) set out 21 questions for stakeholders to consider. These covered, for example, the key issues and policy areas to be addressed and evidence relating to development need. The questions also sought to establish whether the vision and approach of the Core Strategy were still appropriate, and if not, what changes should be made. A Sustainability Appraisal scoping report (document ref SD005.2) was prepared at the same stage.
- 5.6 The Local Plan Scoping Document and its supporting documents were made available for public comment for 6 weeks using a wide range of consultation methods and 212 representations were received. The St Helens Local Plan 2018 – 2033 - Summary of Representations on St Helens Local Plan Scoping Consultation 20 January – 2 March 2016 (document ref LPI002) sets out the issues raised by stakeholders and how the Council responded to those issues.

Preferred Options Consultation (December 2016 / January 2017)

- 5.7 The St Helens Local Plan Preferred Options (LPPO) document 2016 set out a growth based strategy, including Vision, 7 Strategic Aims (supported by 14 Strategic Objectives) and 40 draft policies. The core elements of the strategy proposed at the LPPO stage are set out below.
- 5.8 The overall Vision, Aims and Objectives retained an emphasis on urban regeneration and re-use of brownfield land. However, to meet development needs fully, the removal of some sites from the Green Belt was also proposed.
- 5.9 For housing development, the LPPO proposed that from 1 April 2014 until 31 March 2033 a minimum of 10,830 dwellings be delivered, at an average of 570 dwelling completions per year. This represented an uplift of slightly above 20% over the Objectively Assessed Need (that had, at that stage, been identified as being 451 dwellings per annum). The justification for the uplift was summarised as being to take account of the Borough's ambitions to stabilise and grow the population, allow for more housing choice and competition, and to reflect levels of housebuilding achieved in some previous years¹⁶.
- 5.10 Housing development was to be distributed across the Borough to sustainable locations that addressed the needs of all Key Settlements (i.e., St Helens Core Area, Blackbrook and Haydock, Newton le Willows and Earlestown, Rainford, Billinge, Garswood, and Rainhill), with the scale of development in or around each settlement to be broadly related to its existing scale.
- 5.11 The LPPO proposed that most housing development within the Plan period (i.e., up to 31 March 2033) would be on sites within the existing urban area. However, it also proposed the removal of 16 sites from the Green Belt to help meet housing needs before 2033, with a further 24 sites to be removed from the Green Belt and safeguarded to meet potential longer term housing needs beyond 2033.
- 5.12 For employment development, the LPPO document identified a requirement of 223.4ha¹⁷ (hectares) of land to be developed between 2016 and 2033 (including a 5-year 'buffer'). Employment development was to be focussed mainly on large sites close to the M6 and M62 (mostly within the eastern and southern parts of the Borough). Better transport links were to be sought between housing areas and the new employment growth areas.
- 5.13 Due to a lack of appropriate employment development sites in the current urban areas, most employment development was proposed for 9 sites to be removed from the Green Belt. A further 2 sites were identified for removal from the Green Belt but safeguarded to meet potential longer term employment needs beyond 2033.

¹⁶ See paragraph 4.101 of the LPPO document.

¹⁷ This is the 'total residual employment land requirement' identified in table 4.3, page 35 of the LPPO document.

- 5.14 The largest of the employment development sites proposed in the LPPO were at Parkside East and Parkside West. The land at Parkside East was proposed for allocation as a rail freight interchange, whilst land at Parkside West (including land within and next to the site of the former Parkside colliery) was to be allocated for class B2 and B8 uses. The sites at Parkside present a unique opportunity for the Borough of St Helens, linked to their accessibility to north –south and east-west rail and road links. Further details are set out in the Council’s Parkside background paper (document ref SD024).
- 5.15 The sites proposed for removal from the Green Belt (for housing and employment development) were selected having regard to the methodology in the draft St Helens Green Belt Review 2016. This assessed the importance of the sites to the purposes of the Green Belt, together with a range of sustainability and development deliverability factors. Most of the Borough’s land area (about 56%) was proposed to remain as Green Belt¹⁸.
- 5.16 Other key elements of the strategy proposed at PO stage included (in summary):
- support for the regeneration of St Helens and Earlestown town centres and other smaller centres in the Borough; and
 - a wide range of other policies covering (for example): the spatial strategy; transport; infrastructure funding; green infrastructure; housing mix (including affordable housing); biodiversity; and various other matters.
- 5.17 The Preferred Options document assessed alternative options for each of its 40 draft policies, as well as the spatial scale and distribution of growth. The Sustainability Appraisal also addresses detailed policy and site options. Further details of the alternatives considered for housing and employment growth and distribution are set out in chapters 6 and 7 of this Paper.
- 5.18 An extensive consultation exercise took place on the Preferred Options document (and its supporting Sustainability Appraisal, Habitats Regulation Assessment and other evidence base documents) over 8 weeks between 5 December 2016 and 30 January 2017. 5,695 responses were received. The St Helens Local Plan Preferred Options: Report of Consultation (document ref LPI004) summarises the main issues raised by the representations and how they were addressed in the subsequent Submission Draft – see below.

Publication of the SHBLP Submission Draft (January - May 2019)

- 5.19 The Council published the SHBLP Submission Draft (LPSD) in January 2019. In progressing to this stage, the Council took into account a range of key factors including: the new NPPF introduced in July 2018; updates to national Planning Practice Guidance; updated evidence; and the outcomes of consultation and appraisal processes.

¹⁸ About 65% of the Borough currently is currently designated as Green Belt (the highest proportion of any local authority area in Merseyside).

- 5.20 The LPSD, in common with the LPPO, proposed a growth-based strategy, albeit with reductions in the amount or quantum of development proposed. Its key elements and the reasons for the revised approach are summarised below¹⁹.
- 5.21 The Vision of the Plan has been revised to stress the need for a balanced and inclusive approach to regeneration and growth. It also places further emphasis on protecting and enhancing the built heritage and environment of the Borough. The end-date of the Plan was also changed from 2033 to 2035, to accord with the requirement of the revised NPPF that Local Plans should set out a strategy covering at least 15 years from their adoption (which was anticipated would take place during 2020).
- 5.22 For housing development, the SHBLP proposes that a minimum of 9,234 dwellings be delivered from 1 April 2016 until 31 March 2035, at an average of at least 486 dwelling completions per year. This represents a reduction from the 570dpa set out in the LPPO document. The reduced requirement slightly exceeds the figure (468)²⁰ that was derived from using the new national standard method (for calculating the Objectively Assessed Need - the OAN) introduced by the Government, and is justified by evidence in the St Helens Strategic Housing Market Assessment Update (2016, and 2019 update) (document ref HOU001) and summarised in the Council's Housing Need and Supply Background Paper (document ref SD025).
- 5.23 As far as practicable, housing development will remain focussed on the Key Settlements (St Helens Core Area; Blackbrook and Haydock; Newton le Willows and Earlestown; Rainford; Billinge; Garswood; and, Rainhill). However, due to the reduced amount of housing required (in comparison to that for the LPPO stage) and to promote sustainable development, a greater proportion of housing is to be delivered on brownfield sites in the main urban areas. 10 site allocations are identified to accommodate development within the Plan period (up to 2035) of which 4 are large brownfield sites in the urban area and 6 are to be removed from the Green Belt. 8 sites are to be removed from the Green Belt and safeguarded to meet potential development needs after 2035 (in accordance with NPPF, paragraph 139).
- 5.24 A further change compared to the approach at LPPO stage relates to the status of the proposed Bold Garden Suburb. It is now proposed that (instead of most of the site being safeguarded for post Plan period development) the whole of the site is allocated for development. The development of the site will start before 2035 although most of the resultant housing will still be delivered after 2035. This approach is justified by the highly sustainable location of this site, which is capable of accommodating an estimated 2,988 dwellings, and the need to ensure an effective master planning process. It also accords with

¹⁹ Further details are set out in the report to Council on 19 December 2018 that approved the Submission Draft (LPI007).

²⁰ This is the figure which would have been derived by using the standard method housing need figure of 468 dwellings per annum at the date the SHBLP Submission Draft was published in January 2019. As at October 2020 (based on March 2020 data) the standard method housing need figure is now 434 dwellings per annum. Please see the Housing Need and Supply Background Paper (SD025) for more information.

paragraph 72 of the NPPF, which confirms that “*the supply of large numbers of new homes can often be best achieved through planning for large scale ... significant extensions to existing ... towns ...* “. Progress with the masterplanning of Bold Forest Garden Suburb is summarised in the Council’s position statement (document ref SD027).

- 5.25 For employment development the SHBLP Submission Draft identifies a total residual requirement of at least 215.4ha of land to be developed for employment uses in St Helens between 2018 and 2035. Whilst this is a slight reduction from the nearest equivalent figure (of 223.4ha of land required between 2016 and 2033) quoted in the LPPO it is justified by updated evidence including the St Helens Employment Land Needs Assessment Update 2018 and development completions data. The proposed approach to employment land provision also helps to meet employment land needs across both the City Region and West Lancashire as a whole, as identified in the Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA) 2018.
- 5.26 The range of site allocations for employment development is similar to that proposed at LPPO stage, although one site (site 2ES - Land north east of junction 23 M6, south of Haydock Racecourse, Haydock²¹) is safeguarded for potential development beyond 2035 rather than allocated for development within the Plan period. This is due to site specific highway infrastructure constraints²² and to help ensure that the new Green Belt boundaries will endure well beyond the end of the Plan period. It was considered that this change of approach will have the benefit of avoiding narrowing down the options for the development of a scheme to improve Junction 23 of the M6. The significant improvement of this junction is identified as a key infrastructure priority within the Plan, which would bring substantial benefits to the Borough and the wider transport network. The need for this new approach is also evidenced by the St Helens Council Transport Impact Assessment 2018. This confirms that Junction 23 currently experiences queues and delays during peak periods and that this situation is likely to substantially worsen as the Plan period progresses without effective mitigation being undertaken. It is also not considered essential for the land north east of Junction 23 to be developed before 2035 to meet evidenced needs for employment development within that period.
- 5.27 A further change relates to the land at Parkside East (site reference EA8 in the LPPO). Whereas the LPPO proposed the allocation of the whole of this site for development of a Strategic Rail Freight Interchange (SRFI), the SHBLP Submission Draft reserves a minimum proportion (comprising 60ha) of the site for that use or for other rail served uses. This allows the remainder of the site

²¹ This site was referenced as site EA4 at LPPO stage and as site 2ES in the SHBLP Submission Draft.

²² M6 Junction 23 Haydock Island Capacity Feasibility Study (TRA007) and A580 / M6 J23 Improvement Options Supplementary Report Junction Assessment Results - Vista Road Link Option (TRA008) provide the latest position in relation to the feasibility of different options improving capacity at M6 Junction 23.

to be released for other class B2 or B8 employment uses provided that these avoid prejudicing the ability to develop an effectively laid out SRFI or rail-served development on at least 60ha of the site in the future. The reason for this change (set out in Policy LPA10 of the Plan) is to allow greater flexibility and to ensure the site can make a contribution to meeting employment needs within the Plan period.

- 5.28 Further evidence on employment is set out in the Council's employment land background paper² (document ref SD022).
- 5.29 In support of the approach set out above the SHBLP Submission Draft, in common with the proposals put forward at LPPO stage, is based on a comprehensive review of the Green Belt in St Helens. The methodology for the review has been updated from that used for the Draft Green Belt Review (2016), as set out in the updated Green Belt Review of 2018 (document ref SD020). The Green Belt Review 2018 (in common with the earlier draft) considers the contribution that sites make to the Green Belt as well as sustainability and deliverability factors. See Table 3.1 of the Green Belt Review (2018) for an explanation of the changes to the methodology between the 2016 and 2018 versions.
- 5.30 The SHBLP Submission Draft also contains a wide range of detailed adjustments (e.g. to policy wording) when compared to the approach in the LPPO. These are made for various reasons, such as the need to respond to updated national policy or other changes in circumstances or to improve the clarity of the policies.
- 5.31 The NPPF (following changes originally made in July 2018) now requires that local plans should identify which policies are 'strategic' (as opposed to 'local')²³. The SHBLP Submission Draft includes this in a small table following each policy (and forming part of the Reasoned Justification).
- 5.32 The revised NPPF also requires that 'strategic' policies should not extend onto 'local' matters. In preparing the Submission Draft, the Council considered whether some of the Plan policies should be split and re-numbered to address this matter. However, as the scope of most of the policies had already been established in the LPPO (in 2016) this would have been likely to cause confusion for stakeholders and complications for the Sustainability Appraisal and Habitats Regulation Assessment processes. For these reasons, the structure of the Submission Draft document is based substantially on that of the LPPO, albeit with some minor changes.
- 5.33 The Council's report of consultation²⁴ summarises how feedback from the previous LPPO consultation was taken into account in developing the Submission Draft.

²³ See paragraph 21 of the latest version of the NPPF, dated February 2019.

²⁴ The St Helens Local Plan 2020-2035 Regulation 22 Consultation Statement (SD004)

6 The Reasonable Alternative Options – Housing Growth and Distribution

6.1 The Council has, in preparing the SHBLP, considered a wide range of options relating to the amount of new housing that should be built and its distribution in the Borough. This section identifies the options that the Council has regarded as ‘reasonable alternatives’ (in the context of the NPPF) and indicates why the preferred strategy is considered to be ‘appropriate’ in the light of those options.

6.2 The process included four broad stages:

Step 1: Identify reasonable options for the Borough-wide level of housing growth required;

Step 2: Identify reasonable options for the distribution of housing growth across the Borough;

Step 3: Identify reasonable combinations of overall housing growth and distribution which could be followed; and

Step 4: Identify the preferred level and distribution of housing development.

The ‘reasonable alternative’ options were identified and then refined in the interim and final Sustainability Appraisal documents published in 2016 and 2019 respectively.

Step H1: Identifying Reasonable Options for the Borough-Wide Level of Housing Growth Required

6.3 The Sustainability Appraisal process assessed the following reasonable scenarios for the overall level of housing development:

Scenario A - 451 dwellings per annum;

Scenario B - 570 dwellings per annum;

Scenario C - 712 dwellings per annum; and

Scenario D - 486 dwellings per annum.

6.4 The rationale for selecting these scenarios is set out in paragraphs 4.3.1 to 4.3.15 of the Sustainability Appraisal report 2019 (document ref SD005). In summary:

- Scenario A (451dpa) is the Objectively Assessed Need figure identified in the Mid Mersey Strategic Housing Market Assessment (SHMA) 2016;
- Scenario B (570dpa) equated to Scenario A plus an uplift of just over 20% to take account of factors such as the scope to allow for greater housing choice and competition;
- Scenario C (712dpa) equated to a further uplift of about 25% above scenario B; and

- Scenario D (486dpa) represents the housing requirement figure proposed in the SHBLP, justified by updated evidence when the Plan was published in 2019.
- 6.5 A further option could have been to pursue a housing growth requirement that would exactly meet the housing OAN (now referred to as local housing need) as calculated via the national standard method. This would have given a figure of 468dpa when the Plan was published (January 2019). Whilst this approach would have been reasonable, it is very similar to Scenarios A and D and it was, therefore, not necessary or proportionate to assess it separately within the Sustainability Appraisal process.
- 6.6 The Sustainability Appraisal report 2019 identifies that any alternative option which is below 451dpa would not be a 'reasonable alternative'. The Council supports this conclusion as (in summary) any housing requirement figure which is below 451dpa would fall substantially below the level required to meet housing need (see the Council's Housing Need and Supply Background Paper). The resultant harm would be exacerbated by the fact that no neighbouring district has agreed to accommodate any unmet housing needs of St Helens. There would have been no realistic prospect of such a strategy being found to be sound.
- 6.7 The Sustainability Appraisal report 2019 also identifies that any option which is above 712dpa would not be a 'reasonable alternative'. The Council supports this conclusion as the rate of 712dpa is substantially above the level of evidenced need for housing in St Helens. Whilst the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) 2018 identified a 'growth scenario' at above 712dpa for St Helens this has been superseded by more recent evidence. There is no realistic prospect that a housing requirement figure of above 712dpa would be justifiable given the level of environmental harm and loss of Green Belt that would be caused.
- 6.8 The 'reasonable alternatives' which have been considered for the overall housing requirement figure for St Helens Borough therefore all fall within the range of 451 to 712dpa.
- 6.9 The Preferred Options document 2016 (document ref LPI003) also considered and rejected the following options²⁵:
- set the housing target at 912dpa; and
 - a stepped housing target starting at 451dpa and rising to 630dpa.
- 6.10 These options are still (as at 2020) considered un-suitable. A target of 912dpa would clearly exceed 712dpa and for the reasons stated in paragraph 6.7 above would therefore be unreasonable. A stepped housing target is not necessary as the level of housing growth which can now be justified (486dpa)

²⁵ These options are referred to as alternatives 3 and 4 on pages 53 and 54 of the 'St. Helens Local Plan 2018-2033 Preferred Options' document, 2016, document ref: LPI003.

is similar to the current long term average rate of housing delivery (506dpa²⁶) that is already being delivered in the Borough.

Step H2: Identifying Reasonable Options for the Distribution of Housing Growth Across the Borough

- 6.11 The Sustainability Appraisal process identified 5 options for the distribution of housing growth. These are summarised in table 1 below. The detailed assumptions that lie behind each option are set out in Table 4.2 of the Sustainability Appraisal report 2019.

Table 1: List of Reasonable Housing Distribution Options

| Reasonable Housing Distribution Options | Key Features |
|--|---|
| 1. Proportionate growth/greater dispersal | Each settlement takes a share of new housing development in proportion to current population size. All settlements make provision to meet the Borough's needs for development. Intensification of development in all settlements irrespective of infrastructure provision and capacity. |
| 2. Balanced growth | Regeneration of the main urban area but with increased distribution of development to settlements with deliverable sites, new employment allocations and adequate services and facilities. |
| 3. Focus housing growth close to employment opportunities along key transport routes | Cluster new housing growth around existing settlements along the M6 and M62 corridor to compliment employment allocations. |
| 4. Limited Green Belt dispersal and focus on large scale Sustainable Urban Extension | Limited dispersal to existing Green Belt sites on the edge of main settlements and focus majority of Green Belt release in large scale Sustainable Urban Extension. |

²⁶ This is the average rate of net housing completions in St Helens between 1 April 2003 and 31 March 2020 (source: St Helens Local Plan: Monitoring Report 2020, document ref: SD018).

| | |
|---|---|
| <p>5. Balanced growth, close to employment opportunities with a longer term aspiration to deliver a garden suburb</p> | <p>This approach is a modified version of option 2 and has been followed in the SHBLP Submission Draft. It seeks to provide for a range of housing sites across the Borough, but with housing growth skewed more towards the south. There is also a substantial amount of housing in the urban area. Although the approach involves the allocation of a large urban extension at Bold, the expected delivery in the Plan period on this site is relatively low.</p> |
|---|---|

6.12 Whilst Option 5 represents the Council's proposed approach to housing distribution (set out in the SHBLP Submission Draft) the Council agreed that Options 1 to 4 are also 'reasonable'. These options, therefore, were all considered in Step H3 below.

6.13 The Sustainability Appraisal report 2019 identifies (in paragraphs 4.3.20 to 4.3.27) two other housing distribution options as being "rejected". These are identified in Table 2:, along with reasons why they are not reasonable alternatives.

Table 2: Rejected Options for Housing Distribution Identified in the Sustainability Appraisal Report²⁷

| Rejected Housing Distribution Option | Council Comments |
|--|--|
| <p>Do not release any land from the Green Belt to meet the housing needs of the Borough for the Plan period or for Safeguarded land for the period following it.</p> | <p>This option was originally rejected at the Preferred Options stage (when the housing requirement was set at a figure of 570dpa). Subsequently the housing requirement figure has been reduced (to 486 per annum). Nevertheless, this option remains unrealistic as it is still incapable of meeting the Borough's housing needs in a suitable way. Further details are set out in the Sustainability Appraisal report and in Section 8 of this Paper (Justification for Reviewing the Green Belt).</p> |

²⁷ The full text of these rejected options (as set out in the Sustainability Appraisal report) also covers employment development. The employment related aspects of these options are covered in section 7 of this Paper.

| Rejected Housing Distribution Option | Council Comments |
|---|---|
| <p>Use brownfield and greenfield land in the urban areas, plus limited release of sites that have the least impact on the Green Belt, rather than attempting to ensure a spread of housing sites around the settlements ...</p> | <p>This option was originally rejected at the Preferred Options stage. This was due, for example, to difficulties in ensuring a distribution of housing sites within all settlements across the Borough.</p> <p>Whilst the reasons for rejecting this option at that stage are still considered valid it should be noted that due to the reduced amount of housing development now required (486dpa compared to the figure of 570 per annum proposed at Preferred Options stage) the amount of Green Belt release for housing is now more limited in any event and will not (due to limitations on the availability of suitable sites) include a site allocation in all settlements. This is justified as the housing market operates at a larger scale than individual settlements.</p> <p>Due to the similarities between this option and the strategy now proposed it has not been necessary to re-introduce it as a free standing 'reasonable alternative' housing distribution option.</p> |

- 6.14 Taking account of the points set out above, the options that have moved on to Step H3 below are the 5 options referred to earlier in table 1.

Step H3: Identifying Reasonable Combinations of Overall Housing Growth Figure and Distribution

- 6.15 Drawing upon the 4 housing growth scenarios and 5 distribution options referred to above, the Council has identified 15 reasonable combinations of housing growth and distribution. These are based on Table 4.3 of the Sustainability Appraisal report 2019 and are marked in **bold** in Table 3: below (as options: A1 to A4; B1 to B4; C1; C2; and, D1 to D5).
- 6.16 The Council considers 'proportionate growth' distribution as part of Growth Scenario C (712dpa) to be unreasonable because (in summary) some settlements do not have sufficient suitable site capacity to accommodate the level of growth that would be required. It also considers the 'focus on a new settlement' approach in Scenario C (712dpa) to be unreasonable as it would not be likely to deliver development at a sufficient rate to deliver this amount of growth. Further details of the reasons for these conclusions are set out in paragraphs 4.3.29 to 4.3.32 of the Sustainability Appraisal report 2019.

**Table 3: Reasonable Alternatives for Housing Growth and Distribution
(marked in bold)**

| A: Provide only for the originally identified OAHN (451dpa*) | B: 20% buffer for flexibility (570dpa*) | C: 712dpa for flexibility and additional contingency | D. Updated OAHN - 2018 (486dpa) |
|---|--|---|--|
| A1. Proportionate growth | B1. Proportionate growth | [Proportionate growth] | D1. Proportionate growth |
| A2. Balanced growth | B2. Balanced growth | C1. Balanced growth plus new settlement | D2. Balanced growth |
| A3. Focus on transport routes | B3. Focus on transport routes | C2. Focus on south and a new settlement | D3. Focus on transport routes |
| A4. Focus on new settlement | B4. Focus on new settlement | [Focus on new settlement] | D4. Focus on new settlement |
| N/A | N/A | N/A | D5. The proposed strategy (Balanced growth, close to employment opportunities with a longer term aspiration to deliver a garden suburb) |

Step H4: Identifying the preferred level and distribution of housing development

6.17 To identify the preferred level and distribution of housing development from the reasonable alternatives set out in Step H3, the Council took into account a wide range of factors. These included:

- The need to promote sustainable development in accordance with the NPPF;
- The level of housing need that up to date evidence indicated equated to 486 per annum (see the Housing Need and Supply background paper);
- the need to ensure that the level of housing growth proposed will meet housing needs unless sufficient justification exists for any shortfall; and
- the lack of any capacity in urban areas of any neighbouring district to help meet St Helens housing needs.

- 6.18 Of the ‘reasonable alternative’ growth/distribution options identified above in Step H3 (in Table 3:), all of those in columns A to C have been rejected in Step H4 for reasons set out below and in the Sustainability Appraisal report²⁸.
- 6.19 In summary, the ‘A’ options (451dpa) were rejected as they:
- fail to provide for sufficient housing to meet needs;
 - do not reflect the Borough’s ambitions to continue stabilising the population;
 - do not allow for adequate housing choice and competition to allow a sufficient number of new households to form;
 - do not include sufficient allowance for economic growth; and
 - fall short of the historic levels of new housing growth in St Helens²⁹.
- 6.20 The ‘B’ and ‘C’ options (570 and 712dpa) were rejected because (in summary) they would both lead to an excessive loss of Green Belt, which is not justified by the evidenced level of need for new housing. This would have conflicted with national policy that seeks to protect the openness and purposes of the Green Belt. Additional specific reasons for rejecting alternatives B1 to B4, C1 and C2 are set out in paragraphs 4.5.5 to 4.5.14 of the Sustainability Appraisal report 2019.
- 6.21 The preferred approach to the growth and distribution of housing is alternative D5. This is a variant of D2 and has a growth rate of 486dpa with a balanced growth pattern, with most new housing being close to employment opportunities and with a longer term aspiration to deliver a garden suburb at Bold.
- 6.21.1 Outline reasons as to why alternative D5 is the preferred strategy are provided in paragraphs 4.5.21 to 4.5.34 in the Sustainability Appraisal report. In summary the preferred strategy:
- will direct new development to sustainable locations that are appropriate to its scale and nature, and which will enable good accessibility between homes, jobs and key services;
 - will prioritise the regeneration of deprived areas and focus most new housing where it will re-use previously developed land in existing Key Settlements;
 - will support economic growth by strengthening St Helens and Earlestown town centres and protecting existing employment areas; and
 - is appropriately informed by the Council’s Green Belt review 2018, which identifies the most suitable and sustainable sites for removal from the Green Belt.

²⁸ Sustainability appraisal report 2019 – paragraphs 4.5.4 to 4.5.14 (document ref SD005)

²⁹ 506 dwellings per annum between 1 April 2003 and 31 March 2020 – source St Helens Local Plan: Authority Monitoring Report 2020 (document ref: SD018)

6.22 The Council has also considered alternatives D1 to D4 at the preferred level of growth (i.e., 486dpa). However, these would all involve the delivery of sites which are less suitable in terms of the criteria set out in the Green Belt Review without sufficient justification in terms of the distribution of needs across the Borough.

6.23 Other reasons for discarding individual 'D' options include (in summary):

- Alternative D1 (proportionate distribution) is unsuitable as it would lead to greater growth at settlements that are less well placed to take advantage of economic expansion;
- Alternative D3 (focus on transport routes) is unsuitable as it would lead to an unjustified additional proliferation of development along the M6 and M62 corridors, which would put additional pressure on the settlements of Haydock, Earlestown and Newton le Willows (beyond that which would result from the employment growth in these areas). There would be a requirement to release further Green Belt land of high value/functionality, and greater pressure on road networks that would be difficult to mitigate in the Plan period; and
- Alternative D4 (focus on a new settlement) is unsuitable as it would, by having a significant reliance on providing a new settlement to deliver new housing, make the achievement of housing needs within a timely fashion more uncertain and more reliant upon large scale infrastructure. Whilst the preferred strategy (alternative D5) includes a new suburb at Bold this will form a large extension to the existing built up area rather than being a free standing settlement. It is also expected that delivery of housing at Bold Forest Garden Suburb (under the preferred strategy i.e., Alternative D5) will start towards the latter part of the Plan period up to 2035, with most of the development at this location being delivered beyond then. Alternative D5 is, therefore, a more realistic strategy than alternative D4.

The site selection process for housing

6.24 To support the preferred strategy (Option D5 as identified above) the SHBLP Submission Draft proposes a spread of housing land supply across the Borough, with the main sources of supply being drawn from the following sources:

- the developable capacity within existing urban areas; and
- proposals for expansion of the urban area on sites identified via the St Helens Green Belt Review (GBR) 2018.

6.25 The first of these sources (the urban land supply) largely comprises sites that are already identified as being, in principle, suitable for housing in the Council's Strategic Housing Land Availability Assessment and/or Brownfield Register. The second source (the Green Belt Review) has operated as a 'top up' to bring forward further sites to enable the overall strategy (including a sufficient number of homes to meet identified needs) to be delivered.

- 6.26 The GBR assessed sites against a robust methodology that takes account of the contribution that the sites currently make to the Green Belt, transport accessibility, infrastructure provision, other deliverability and planning considerations, and the overall Plan strategy.
- 6.27 Whilst a site allocation is not identified in all settlements (as the housing market operates over a larger footprint) the SHBLP Submission Draft contains at least one site allocation within or close to each Key Settlement. The proposed spread of housing development also takes account of proposals within neighbouring districts such as at Halsnead, which is just to the west of Rainhill and is allocated for about 1,500 new dwellings in Knowsley's adopted local plan.
- 6.28 The Green Belt Review identifies that land at Bold forms a major strategic opportunity to provide a wide range of new housing in an area that is close to some of the more deprived parts of the Borough, it would thereby contribute to its balanced growth. It also has good accessibility to jobs and services and high levels of compliance with other aspects of the Green Belt Review methodology. This site (now identified as site allocation 4HA, with an indicative capacity of nearly 3,000 dwellings) therefore forms a substantial element within the overall strategy, albeit with a limited assumed delivery within the Plan period to reflect the currently early stage of the masterplanning of this large site.

7 The Reasonable Alternative Options – Employment Growth and Distribution

- 7.1 A key requirement for the new Local Plan is to meet the evidenced needs of St Helens for new employment development. As set out in the reasoned justification to SHBLP LPA04 and the Employment Land Need and Supply Background Paper (document ref SD022), it has been calculated that at least 227.4 hectares of employment development needs to be delivered in the Borough between 2012 and 2035. The Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) 2018 (document ref SUB001) identifies a substantial need for large scale B8 warehousing and logistics buildings (defined as over 9,000m²) for the City Region.
- 7.2 To define reasonable alternatives for employment development, the Council has taken into account the specific types of site required to meet needs. The large scale logistics sector in particular has a need for large sites that have good access to motorway and other key transport corridors. Compared to housing sites, the potential pool of sites that meet these requirements and could be made readily available for employment development is limited.
- 7.3 Taking account of these factors, the Council has followed a 2 stage approach as follows:
- Step E1: Identify reasonable employment growth options (comprising different combinations of deliverable sites); and
 - Step E2: Identify the preferred employment growth option.

Step E1: Identifying Reasonable Employment Growth Options

- 7.4 At the Preferred Options (LPPO) stage of plan preparation, the Council's Sustainability Appraisal report focussed on just one 'reasonable' option for the overall amount of employment growth, equating to the proposed strategy at that stage.
- 7.5 The Council did however discount two options at LPPO stage as being 'unreasonable'. These were to:
- *“provide significantly less employment land than identified objectively assessed needs”*; and
 - *“provide significantly more employment land than the identified employment land requirement”*.

Neither of these options is precisely defined and they were rejected for reasons stated in paragraphs 4.2.21 and 4.2.22 of the Sustainability Appraisal report.

- 7.6 The LPPO also rejected the option of using an alternative method (based on economic forecasts) to measure employment land needs. This option would be as an alternative to the historic trends based approach used in the

Council's evidence base. The reasons for rejecting it are set out in paragraph 4.87 of the LPPO.

- 7.7 As the Plan progressed, the Council took the view that the range of options for employment growth should be re-assessed. Accordingly, the Sustainability Appraisal report published alongside the SHBLP Submission Draft identified 3 reasonable alternatives for employment growth. These were:
- Alternative 1 – 'Proposed approach';
 - Alternative 2 - 'Low growth' option; and
 - Alternative 3 - 'Higher growth' option.
- 7.8 The rationale for identifying these options is set out in paragraphs 4.2.6 to 4.2.19 of the Sustainability Appraisal report 2019. Each of the alternatives proposed a different mix of site allocations. In summary:
- Alternative 1: 'proposed approach' included the allocation of 265ha of employment land, as set out in the SHBLP Submission Draft.
 - Alternative 2: 'low growth' option aimed to deliver sufficient development to meet a notional one-seventh share of the sub-regional need for large scale B8 uses and the specific needs of St Helens for non-large scale B8 uses as set out in the SHELMA. It would result in approximately 130ha of land being allocated for employment development; and
 - Alternative 3: 'higher growth' option proposed the allocation of a higher total provision of 306.09ha of employment land.
- 7.9 The Council considers that any option which would allocate less than 130ha of employment land would not be reasonable as it would fall substantially below the level required to meet need. The resultant harm would be exacerbated by the limited availability of land in the Liverpool City Region for large scale B8 uses.
- 7.10 The Council also considers that any option which would allocate significantly more employment land than suggested by Alternative 3 ('higher growth') would not be reasonable as this would substantially exceed the level of evidenced need for employment development in St Helens. There is no realistic prospect that this approach would be justifiable given the level of environmental harm and loss of Green Belt that would be caused.
- 7.11 Therefore, the 3 options that progress to Step E2 are those set out in paragraph 7.7 above.

Step E2: Identifying the preferred employment growth option

- 7.12 The relative merits of the 3 'reasonable' employment alternatives are set out in paragraphs 4.4.1 to 4.4.7 of the Sustainability Appraisal report.
- 7.13 Alternative 2 would result in a lower impact on infrastructure and/or the environment, and lead to a lesser loss of Green Belt land when compared to Alternatives 1 and 3. However, it has been rejected because (in summary) it

would fail to meet the employment needs of St Helens and would fail to take adequate account of the locational advantages of St Helens for the growing logistics sector within the Liverpool City Region.

- 7.10 Alternative 3 would bring greater economic benefits than the other options. However, it was been rejected because (in summary) it would lead to a higher level of impact on critical highway infrastructure and the environment than Alternative 1.

8 Justification for Reviewing the Green Belt

- 8.1 This section summarises the exceptional circumstances that provided justification for the Green Belt Review in St Helens, in accordance with national policy. Further details are in Section 1 of the St Helens Green Belt Review 2018 (document ref SD020).

History of the Green Belt in St Helens

- 8.2 The Green Belt boundary in St Helens was first set in the Merseyside Green Belt Local Plan 1983. The boundaries were tightly defined around existing urban areas to support the regeneration of urban areas. Since 1983, the boundaries have remained substantially unaltered. About 65% of the Borough's land area is currently Green Belt (the highest proportion of any Merseyside district).
- 8.3 The St Helens Unitary Development Plan (1998) and the St Helens Core Strategy (2012) both focussed most new development into existing urban areas. Neither document contained any substantive change to Green Belt boundaries. However, the Core Strategy identified a potential need for Green Belt release to meet needs for new housing from 2022 onwards³⁰.
- 8.4 The Core Strategy did not identify a need to release Green Belt land for employment uses, and only allowed for any Green Belt Review to be undertaken following a strategic review at the sub-regional level. However, for reasons set out below, circumstances have changed markedly since the Core Strategy was formulated.
- 8.5 Firstly, the North West Regional Spatial Strategy, which formed an important part of the strategic context within which the Core Strategy was prepared, has now been revoked.
- 8.6 Secondly, as early as 2011 it became apparent that there were pressures on land supply for housing and employment development across the Liverpool City Region (including St Helens). This evidence is set out in the Liverpool City Region Housing and Economic Development Evidence Base Overview Study³¹ (2011). As a result, Knowsley, Sefton and West Lancashire Councils have all undertaken Green Belt reviews that have been found sound at Examinations in Public and, as a result, underpin adopted local plans. Halton Council has undertaken a similar review to underpin its emerging local plan document. The issues faced by St Helens and these other authorities are all similar i.e., a shortage of land for development, which can only be suitably met by reviewing the Green Belt.
- 8.7 Thirdly, similar issues are also being addressed in other neighbouring authorities outside the Liverpool City Region, including in the emerging Greater Manchester Spatial Framework (which will cover all the Greater

³⁰ See part 2iv) of Policy CH1 within the St Helens Local Plan Core Strategy (October 2012).

³¹ Ref SUB005.

Manchester authorities, including Wigan) and the emerging Warrington Local Plan. The strategic shortfall of urban land supply (which also affects St Helens) forms the backdrop for reviews currently being undertaken in these areas.

- 8.8 Fourthly, the SHBLP will need to allow for development needs (both for housing and employment) much further into the future than the period covered by the Core Strategy. The SHBLP can only meet these needs (as summarised below) if it is supported by a review of the Green Belt.

Housing Needs

- 8.9 To meet housing need at least 9,234 dwellings will need to be completed in the Borough between 2016 and 2035. Whilst sites within the current urban area can meet most of this requirement, it has been established that sites with an overall capacity of at least 2,034 dwellings must be released from the Green Belt³².
- 8.10 The Council's annual housing requirement figure (486 per annum) slightly exceeds the figure of 468 per annum that would apply if the national standard method had been used³³. However, using the standard method would only reduce the overall need figure by 342 dwellings over the 2016-2035 period. There would still be a need for an estimated 1,692 dwellings to be built on sites removed from the Green Belt.
- 8.11 The Council has carefully considered whether the required level of housing development could be achieved without the need for Green Belt release. However, to pursue this option the Council would have needed to do one or both of the following:
- a) substantially reduce its housing requirement figure below the level of need (with neighbouring authorities being asked to make up any shortfall); and/or
 - b) substantially increase the amount of housing delivered on sites within the urban area.
- 8.12 Option 'a)' would have only constituted a 'positively prepared' strategy if the shortfall would be sustainably made up by provision in another local authority area. However, this is demonstrably not the case as both Halton and Warrington (the other authorities in the same housing market area as St Helens) also have shortages of urban land supply to meet their needs. A similar situation exists in other neighbouring authorities. No neighbouring authority proposes to accommodate any un-met needs from St Helens.

³² See table 4.6 of the SHBLP Submission Draft 2019. Please note an updated version of this table has been provided in Appendix 5 of the Housing Need and Supply Background Paper (SD025).

³³ This is the figure which would have been derived by using the standard method housing need figure of 468 dwellings per annum at the date the SHBLP Submission Draft was published in January 2019. As at October 2020 (based on March 2020 data) the standard method housing need figure is now 434 dwellings per annum. Please see the Housing Need and Supply Background Paper (SD025) for more information.

- 8.13 With regard to option 'b)', the Council's proposed strategy in the SHBLP already seeks to ensure the efficient use of the urban land supply, including the release of surplus sites and use of high densities where appropriate. This option could only provide a positively prepared strategy if an unreasonable degree of 'town cramming' was proposed, involving very high densities and/or unsuitable loss of greenfield land in the urban areas, with resultant harm to infrastructure provision, loss of recreational land, and changes to the character of the built environment. In addition, the deliverability of high density schemes in the Borough's urban areas could be difficult as some previous high density schemes have faced challenging viability.
- 8.14 It has also been established that a Green Belt review is required in any event to meet employment land needs (see below for further details). Carrying out the Green Belt Review for employment but not housing at this stage would conflict with the NPPF requirements that such reviews should be comprehensive and provide boundaries which have regard " ... *to their intended permanence in the long term and which extend well beyond the plan period*".

Employment Land Needs

- 8.15 It has been established that St Helens has a need for at least 227.4ha of land to be developed for employment use between 2018 and 2035. The current deliverable supply of land on urban sites in the Borough (i.e. sites which do not have a Green Belt designation and including urban SHBLP allocations) amounts to just 15.79ha. Therefore, the current urban land supply is only sufficient to provide 6.9% of the Borough's need for employment land over the Plan period.
- 8.16 Furthermore, it has been established that there is a particular need for large scale Class B8 storage and distribution uses in St Helens. None of the developable sites in the urban areas of the Borough satisfy the criteria required by the market for such uses.
- 8.17 To help meet the shortfall of land, planning permission has already been granted for employment development on 2 sites that are proposed for removal from the Green Belt and allocated for this use in the SHBLP, namely site 2EA (Florida Farm North, Slag Lane, Haydock) and site 3EA (land north of Penny Lane, Haydock). Whilst the relevant applications were referred to the Government under departure procedures, the Secretary of State decided not to call them in for decision. The development planned for these sites has been completed as at October 2020. These points indicate the urgency of addressing the need for employment development.
- 8.18 As with housing, the Council has carefully considered whether employment land needs can be met without the need for further Green Belt release. However, although the Borough shares a functional economic market area with Halton, Knowsley, Liverpool, Sefton, West Lancashire and Wirral, none of those authorities have identified spare capacity for employment development

that could help meet the needs of St Helens. There is no scope to substantially increase the supply of deliverable land within the urban area of St Helens, particularly for large scale logistics.

- 8.19 Further considerations also apply to the strategic sites at Parkside East and Parkside West, both of which are proposed for removal from the Green Belt. The scope to develop a strategic rail freight interchange at Parkside has long been established, including in the adopted Core Strategy (2012). A substantial portion of the Parkside West site also comprises previously developed land associated with the former Parkside Colliery. The development of the Parkside sites offers a unique opportunity for the Borough. Further details are set out in Policy LPA10 of the SHBLP and in the Council's background paper on Parkside (document ref SD024).

Other Points

- 8.20 If a neighbouring authority had indicated a willingness to accommodate some of the development needs of St Helens, it is unclear that this could be achieved without Green Belt loss in their area; i.e. preventing the prospective loss of Green Belt in St Helens could likely result in the potential loss of Green Belt elsewhere.
- 8.21 If demand for new employment development was required to be met outside the Borough, this would be likely to exacerbate existing high levels of net out-commuting, thereby prejudicing the ability to achieve sustainable patterns of travel and making it more difficult for residents of St Helens, some of whom are likely to be reliant on public transport, to access employment.
- 8.22 Within the Green Belt Review, the Council has also identified substantial areas of Safeguarded land for housing and employment. Safeguarded land is land between the urban area and the new Green Belt boundary. It is not allocated for development within the SHBLP period up to 2035. The purpose of identifying Safeguarded land is to ensure that longer-term development needs can be met stretching well beyond the plan period, as required by the NPPF.
- 8.23 As set out above, a failure to remove land from the Green Belt in St Helens would result in a substantial shortfall in the supply of land to meet housing and economic development needs. For this reason, the review of Green Belt boundaries which is proposed to meet these needs is fully in line with the presumption in favour of sustainable development as defined in the NPPF.
- 8.24 The Green Belt Review also identifies:
- 'minor' changes to Green Belt boundaries required to correct small scale anomalies in the existing Green Belt boundaries; and
 - 'consequential' changes that arise from the removal of sites from the Green Belt to meet development needs and are needed to ensure that the new boundaries are logical and use firmly defined features on the ground where possible, in accordance with national policy.

- 8.25 Further details are set out in the Council's Green Belt Review and in its background papers on housing and employment land needs and supply.

Meeting Needs Beyond the Plan Period

- 8.26 NPPF Paragraph 139 requires that when local planning authorities define Green Belt boundaries, they, where necessary, identify areas of safeguarded land to meet longer term needs stretching well beyond the Plan period. However, national planning policy and guidance does not set out how local planning authorities should determine what amount of land beyond the Plan period would be deemed adequate.
- 8.27 In the absence of national guidance, the Council have sought to use a practical and balanced approach to the designation of safeguarded land. Being mindful of the uncertainties that are inherent with calculating longer term needs and the need to demonstrate exceptional circumstances to justify the release of Green Belt land, the Council have not sought to identify specific housing or employment land need requirements for post 2035. The Council have instead identified a reasonable amount of land to be safeguarded in order to meet future development needs.
- 8.28 SHBLP Policy LPA06 identifies 2 sites to be removed from the Green Belt and safeguarded in order to meet longer term employment needs beyond the Plan period. The approach to safeguarding land for employment use is set out in more detail in section 3 of the Council's Employment Land Needs and Supply Background Paper (document ref SD022).
- 8.29 SHBLP Policy LPA06 also identifies 8 sites to be removed from the Green Belt and safeguarded in order to meet longer term housing needs beyond the Plan period. The approach to safeguarding land for housing use is set out in more detail in section 3 of the Council's Housing Land Needs and Supply Background Paper (document ref SD025).
- 8.30 SHBLP Policy LPA06 makes it clear that safeguarded land is to meet longer term development needs well beyond the Plan period, and that planning permission for the development of the safeguarded sites will only be granted following a future Local Plan Review that proposes such development.

Appendix 1 Green Belt Reviews in Nearby Authorities

| <u>Authority</u> | <u>Comments and Current Position</u> |
|---|---|
| Halton | Core Strategy adopted in 2013 established the need for a localised Green Belt review. The Halton Delivery and Allocation Local Plan proposes to remove a number of sites from the Green Belt is currently (as at October 2020) at its examination in public. |
| Knowsley | The Knowsley Local Plan: Core Strategy (adopted in 2016) removed a number of sites from the Green Belt to meet housing and employment needs. |
| Liverpool | City Council area has limited areas of Green Belt. Liverpool Local Plan is currently (as at October 2020) at its examination in public. |
| Sefton | Sefton Local Plan (adopted 2017) removed a number of sites from the Green Belt to meet housing and employment needs. |
| Warrington | The emerging Warrington Borough Local Plan proposes to remove a number of sites from the Green Belt to meet housing and employment needs (Reg.20 publication stage - April 2019). |
| West Lancashire | West Lancashire Local Plan (adopted 2013) removed a number of sites from the Green Belt to meet housing and employment needs. West Lancashire Council has subsequently consulted on further potential release of Green Belt and is currently considering the approach to take in a new local plan document. |
| Wirral | Consulted on the findings of an initial review of the Green Belt in autumn 2018, in order to inform its emerging Local Plan. |
| Greater Manchester local planning authorities (including Wigan) | Consultation on pre-publication draft of Greater Manchester Spatial Framework took place in January 2019. Proposes to remove a number of sites across the Greater Manchester area from the Green Belt to meet housing and employment needs. The nearest of the affected sites to St Helens would be in Wigan. |