

On Behalf of Homes England
**St Helens Council Local Plan
Examination in Public
Hearing Statement**

Spatial Strategy and Strategic
Policies

Week 1, Matter 3

This report takes into account the particular
instructions and requirements of our client.

Introduction

This Hearing Statement has been prepared by Ove Arup & Partners Ltd ('Arup') on behalf of Homes England.

Homes England owns the land referred to as the Omega South Western Extension. The land comprises 31.2ha and is subject to a proposed Employment Allocation (Site 1EA) in the St Helens Council Local Plan Submission Draft. Homes England is therefore providing this Hearing Statement in their capacity as landowner, not as a prescribed Governmental body.

This Hearing Statement supplements Homes England's previous formal representations. The following responds to specific questions set out in the Inspector's Matters, Issues and Questions (April 2021) in relation to Week 1, Matter 3, particularly Issue 2, Questions 4 and 6.

Matter 3, Issue 2: Green Belt and Exceptional Circumstances

4. Have, in principle, exceptional circumstances been demonstrated for the alteration of Green Belt boundaries?

The Local Plan Submission Draft seeks to meet the Borough's objectively assessed employment land needs, which have been assessed using a methodology which accords with the NPPF and PPG. Through the relevant evidence base it has been established by the Council that Green Belt land will be required to meet the employment (and housing) needs of the Borough in the future, which is considered an exceptional circumstance.

The Developing the Strategy Background Paper (SD026, Section 8) provides detailed justification for the Green Belt Review in St Helens and shows clear accordance with national policy. This paper sets out the history of Green Belt in the Borough, stating that the boundaries have remained substantially unaltered since 1983 and around 65% of the Borough's land area is currently Green Belt. Since then, there has been a change in market trends and the undersupply of land to deliver employment needs.

Section 8.15 of the Developing the Strategy Background Paper (SD026) also identifies that 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) amounts to just 15.79ha of land. The Allocations Local Plan Economic Evidence Paper (EMP003, section 7.4.1) concludes that large scale logistics is the most active market in the region and represents a clear opportunity for St Helens. Therefore, there has been a requirement to revisit the Green Belt to consider partial release.

St Helens' Employment Land Need and Supply Background Paper (SD022, section 4.8) states that there has been an increasing demonstration of the need for employment sites in St Helens that could provide for large scale logistics operators. This is supported further by the recent planning applications in St Helens for large scale B8 logistics development. These include Haydock (2EA, planning application reference P/2016/0608/HYBR and 3EA, planning application reference P/2015/0571/HYBR) and the Call-In applications at Parkside (PINS Reference APP/H4315/V/20/3253194) and Omega West (PINS Reference APP/H4315/V/20/3265899). Additionally, the LCR SHELMA 2018 (SUB001, section 12) identifies a substantial need for large scale B8 warehousing and logistics buildings for the LCR. Over the period to 2037, a need for 308ha of land for strategic B8 development is identified in the report's Baseline/Do Minimum Scenario. The report's market analysis points to a shortage of large sites capable of accommodating large scale B8 development and there is an evident need to identify additional land.

The Council has carefully considered whether employment land needs can be met without the need for further Green Belt release. Through Duty to Cooperate, it has

been established that none of the neighbouring authorities have identified spare capacity for employment development that could help meet the needs of St Helens, specifically the particular need for large scale Class B8 storage and distribution uses.

Due to this large-scale requirement of land, there is also no scope to substantially increase the supply of deliverable land within the urban area of St Helens. The Council's Green Belt Review (SD020, section 1.14) sets out that substantial shortfalls have been identified in the overall quantity, quality and range of sites within existing urban areas that can be made available for housing and employment development over the Local Plan period, both within the Borough and in other nearby locations.

Summary Matter 3: Green Belt Exceptional Circumstances Case

Evidence shows that there is insufficient land within the Borough, including current urban areas to meet the Borough's objectively assessed employment land needs. Careful consideration has been given to non-Green Belt sites. Engagement with neighbouring authorities has demonstrated there are no suitable alternative sites to meet the needs of St Helens.

Therefore, exceptional circumstances have been demonstrated to ensure land is released from the Green Belt to meet these employment needs. This falls in line with the presumption in favour of sustainable development as set out in the NPPF.

6. On a Boroughwide level is the methodology for Green Belt assessment robust and reasonably consistent with that used by adjoining authorities?

The Green Belt Review considers the contribution that sites make to the Green Belt as well as sustainability and deliverability facts. The review assesses sites against a robust methodology that took account of the contribution that the sites currently make to the Green Belt.

The Council's Green Belt Review (SD020, section 1.4) states the Review assesses the potential for development in those areas that contribute least to the purposes of the Green Belt, taking into account site-specific constraints such as flood risk, ecology and access. In preparing the final Green Belt Review, the Council carefully considered all the consultation responses that it received, the methods that have been used successfully by other nearby authorities in recent Green Belt Reviews and national best practice (i.e. Planning on the Doorstep, Planning Advisory Service).

The Government has not set any prescribed approach for Councils to follow when undertaking a Green Belt Review. However, section 2.1 of the Council's Green Belt Review (SD021) states that the Review's methodology has followed a step by step approach, in common with reviews that have successfully been undertaken in nearby authorities. This approach is set out clearly within the Green Belt Review (SD021, Section 2) and further confirms the similarities in methodology to that of reviews by nearby local authorities in the North West in addition to relevant Government Planning Inspector's advice, specifically on the examination into Leeds City Council's Core Strategy (September 2014).

St Helens' Duty to Cooperate Statement (SD009, Page 28) highlights that the Council engaged closely with the neighbouring districts and other Duty to Cooperate bodies when undertaking the Green Belt review. This included consultation on the initial draft of the proposed methodology and further consultation on the draft Green Belt review. Where bodies commented, the Council carefully considered the comments and made changes to the Plan at subsequent stages where justified. This matter is also addressed in the LCR Spatial Planning Statement of Common Ground (2019) and the Warrington Borough Statement of Common Ground (2019).

Section 3 of the Green Belt Review (SD021) shows clearly how its methodology has evolved the Local Plan process, taking into account consultation exercises and the assessment of the importance of identified parcels of land. Reference to relevant NPPF policy is stated throughout and clear reasons on taking a specific approach to the methodology are set out.

Developing the Strategy Background Paper (SD026, section 8.24) also highlights that the review identified consequential changes that arise from the removal of sites from the Green Belt to meet development needs. The review ensured that the new boundaries are logical and used firmly defined features on the ground where possible, in accordance with national policy. Appendix 1 of SD026 also considered the Green Belt Reviews in nearby Authorities.

Summary Matter 3: Green Belt Methodology

It is considered that the methodology for the Green Belt review has been carried out in a robust and reasonable manner in accordance with National Policy and Best Practice.

Consideration of adjoining and nearby authorities is evidenced within the Green Belt review, the Developing the Strategy Background Paper, and the Borough's Duty to Cooperate. This has ensured consistencies in methodologies where relevant.

The methodology should therefore be judged to be a sound means for assessing the contribution of land to the Green Belt in addition to assessing impact on the remainder of the Green Belt.