

**St Helens Borough Local Plan Examination**  
Matter 4 Session 4 Hearing Statement on  
behalf of Peel L&P (Participant ID RO1959)

May 2021

# 1. Session 4: Allocations, Safeguarded Land and Green Belt boundaries Bold, Eccleston, Sutton Manor, Thatto Heath and St Helens Core Area

## Issue 1: Omega South Western Extension (1EA) and Omega North Western Extension (1 ES)

**Q2: In relation to these exceptional circumstances, is Site 1EA justified to meet Warrington's needs, having particular regard to the stage that Warrington's LP has reached?**

1.1 1ES is a western extension of the Omega employment development adjoining the main urban area of Warrington. It is accessed via the existing development. The M62 forms a physical northern boundary to the urban area of Warrington, separated from St Helens with no passing point (over or under) the motorway in this location. The site is disconnected from the main areas of population within St Helens. Access to settlements in St Helens would be convoluted and the site has no relationship with the urban area of the Borough.

1.2 In the context of the DSLP's Spatial Strategy, the allocation would not be justified to meet St Helens needs. The Spatial Strategy seeks to meet these needs within named Key Settlements. Site 1EA does not fall within or on the edge of any of these. It would be an unsustainable site to meet needs arising in St Helens.

### **Q7. Should Site 1ES be allocated rather than safeguarded so that it contributes to meeting needs in the plan period?**

1.3 See response to Q2. Whilst located to the north of the M62, Site 1ES is still disconnected from the main areas of population of St Helens and is not located within the Key Settlements where development is to be focused. It is poorly located to meet St Helens needs. To the extent that its designation may be justified, this is solely on account of it being able to meet development requirements arising in Warrington.

## Issue 2: Bold Forest Garden Suburb (4HA), Land South of Gartons Lane (5HA) and Former Penlake Industrial Estate (3HA)

### **Q12. Do the Green Belt assessments support allocations 4HA and 5HA and demonstrate exceptional circumstances for the removal of land from the Green Belt?**

1.4 No.

1.5 Peel's Matter 3 Statement draws attention to a number of deficiencies in the Green Belt Review's (GBR)<sup>1</sup> methodology. This results in a misrepresentation of sites in relation to their Green Belt contribution and allocations which are not the most sustainable when considered on a comparative basis.

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<sup>1</sup> Examination Document SD020.

- 1.6 Further, and noted in Peel's Matter 3 statement, additional Green Belt releases on the edge of the St Helens Core Area (both as allocations and safeguarded designations) for housing are not justified on account of the conflict with the Plan's Spatial Strategy. Methodologically, and as a means of selecting the most sustainable sites for to deliver the plan's housing requirement (and its Spatial Strategy), the GBR is flawed.
- 1.7 The GBR also underplays the Green Belt contribution made by some sites relative to others and sites have not be appraised on a consistent basis in this regard. In respect of Site 5HA, corresponding with Parcel 080 in the GBR, the appraisal concludes that the site makes a 'low' contribution to Purpose 3 (to safeguard the countryside from encroachment) due to development being visible from the south, east and west and only having a semi-rural character due to encroachment from existing development (outside of the site).<sup>2</sup>
- 1.8 This is contrasted with the assessment of Parcel 053\_A (See Matter 3 Statement). Here no account is taken of the influence of external urban development (including the M6 motorway, Junction 23 of the M6, the A580 and Haydock Industrial Estate) and its visibility and audibility in the context of that parcel in concluding that the site makes a high contribution to Purpose 3.
- 1.9 The GBR's conclusions regarding Site 5HA, relative to Parcel 053\_A are flawed. They are not based on a fair assessment of its Green Belt context, relative to that of other sites, undertaken on a consistent basis. The GBR does not support the allocation of Site 5HA particularly.

**Q14. Are the configuration and scale of the allocations justified taking into account development needs, the Green Belt assessments and land ownership?**

- 1.10 See response to Q12 and Matter 3.

**Q16. Would the adverse impacts of developing Sites 4HA and 5HA outweigh the benefits?**

- 1.11 Limited information has been prepared by the Council or land owners/developers to underpin the allocation of Site 4HA. There is no evidence of land owners (14 identified<sup>3</sup>) working collaboratively to masterplan the site and present a delivery/phasing strategy, rather each is acting independently with the intention that each parcel can come forward on its own<sup>4</sup>. This is not an appropriate approach to delivering a site of this scale and brings into question the ability to bring it forward in a sustainable manner and secure the mitigation and infrastructure needed to accommodate the proposal and manage its impacts.

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<sup>2</sup> Examination Document SD020 page 364

<sup>3</sup> Examination Document SD027 paragraph 6.2

<sup>4</sup> Examination Document SD027 paragraph 6.5

**Q18. Are the net developable areas, minimum densities and indicative site capacities within Table 4.5 justified and effective?**

1.12 See Matter 5.

**Q20. Will infrastructure to support the allocations be delivered at the right time and in the right places?**

1.13 See response to Q16 and Matter 5.

**Q21. Are there any barriers to Sites 4HA and 5HA coming forward as anticipated by the housing trajectory for example land assembly/multiple ownerships?**

1.14 See response to Q16 and Matter 5.

**Issue 3: Eccleston (3HS), Sutton Manor (6HS) and Thatto Heath (10EA, 9HA, 7HS)**

**Q24. Do the Green Belt Assessments support the safeguarded land (3HS, 6HS, 7HS) and demonstrate exceptional circumstances for the removal of land from the Green Belt?**

1.15 No.

1.16 See response to Q12 paragraphs 1.4 to 1.6 which apply equally to Sites 3HS, 6HS and 7HS.

**Q27. Should any of the safeguarded sites be allocated rather than safeguarded so they can contribute to meeting housing needs in the future?**

1.17 See Matter 3. This could only be justified once deficiencies in the spatial distribution of allocations are first addressed.

**Q29. Are the net developable areas, minimum densities and indicative site capacities within Table 4.8 justified and effective?**

1.18 See Matter 5.

**Issue 4: Gerards Park, College Street (11 EA), Land east of City Road, Cowley Hill (6HA), Moss Nook Urban Village (10 HA) and Land south of Windle (8HS)**

**Q32. Does the Green Belt Assessment support the safeguarded land (8HS) and demonstrate exceptional circumstances for the removal of land from the Green Belt?**

1.19 No.

1.20 See response to Q12 paragraphs 1.4 to 1.6 which apply equally to Site.

**Q35. Should Site 8HS be allocated rather than safeguarded so that it can contribute to meeting needs during the plan period?**

1.21 See response to Q27 above.

**Q40. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities within Tables 4.1, 4.5 and 4.8 justified and effective?**

See Matter 5.

**Q42. Will infrastructure to support the allocations be delivered at the right time and in the right place?**

1.22 See Matter 5.

**Q43. Are there any barriers to Sites 6HA and 10HA coming forward as anticipated by the housing trajectory?**

1.23 See Matter 5.

**Turley**  
1 New York Street  
Manchester  
M1 4HD

T 0161 233 7676