



St Helen's Local Plan Examination

Lovell Partnerships Ltd's Response to Matter 4 – Allocations, Safeguarded Land and Green Belt Boundaries

Land at Chapel Lane

On behalf of Lovell Partnerships Ltd.

May 2021

CONTENTS

1. INTRODUCTION	1
2. LOVELL'S RESPONSE TO MATTER 4	3

APPENDICES

APPENDIX I – LOVELL'S DEVELOPMENT STATEMENT (MAY 2021)

APPENDIX II - EXTRACT OF LOVELL'S RESPONSE TO MATTER 3, ISSUE 2

APPENDIX III - EXTRACT OF CASE LAW RELATING TO EXCEPTIONAL CIRCUMSTANCES

APPENDIX IV - EXTRACT OF LOVELL'S RESPONSE TO MATTER 3, ISSUE 3

APPENDIX V - COUNCIL'S STAGE 2B ASSESSMENT OF THE SITE

APPENDIX VI - LOVELL'S ASSESSMENT OF THE SITE USING COUNCIL'S STAGE 2B PROFORMA

APPENDIX VII – TOGETHER HOUSING LETTER OF SUPPORT (MAY 2021)

APPENDIX VIII – BIODIVERSITY ENHANCEMENT MEASURES REPORT (MAY 2021)

APPENDIX IX - TRANSPORT ASSESSMENT (MAY 2021)

APPENDIX X – SITE 6HS SITE PROFILE

APPENDIX XI – SITE 6HS SITE PROFILE (COUNCIL'S PROPOSED MODIFICATIONS)

APPENDIX XII – LOVELL'S ASSESSMENT OF THE CHAPEL LANE SITE AGAINST THE SITE PROFILE REQUIREMENTS

Prepared By: AH/PN/JS

Asteer Planning LLP, Suite 510, 275 Deansgate, Manchester, M3 4EL

Version Final

Date: 21.05.21

1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Asteer Planning on behalf of Lovell Partnerships Limited ('Lovell') in relation to **Matter 4 – Allocations, Safeguarded Land and Green Belt Boundaries**. Lovell are working closely with the landowners (previously promoting the site) and have an agreement in place to promote the land at Chapel Lane, Sutton Manor ('the site') which is proposed to be removed from the Green Belt and allocated as a safeguarded site for housing (Site 6HS) through the Local Plan (Policy LPA06: Safeguarded Land).
- 1.2 Lovell is seeking to bring forward a high quality, sustainable residential development for 100% affordable housing on the site, delivering approximately 150 affordable homes early in the plan period through its joint venture partnership (Lovell Together) with Together Housing Group, a Registered Social Landlord. Lovell – Together Corporate Joint Venture LLP is an existing special purpose vehicle under which this site would be delivered. Together Housing Group are a Homes England Strategic partner and have an existing £53m of Homes England grant allocation secured to give greater certainty on delivery.
- 1.3 It is proposed that the site will deliver 50% affordable rent and 50% shared ownership using existing grant funding. As a consequence of the funding, the site is highly deliverable and would make a significant positive contribution towards meeting both affordable housing and overall housing needs early in the Plan period. Lovell therefore seek a modification of Policy LPA05 (Meeting St.Helens Borough's Housing Needs) and Policy LPA06 (Safeguarded Land) to convert the safeguarded site allocation to a residential allocation.¹ This would return the site to the status it held in the draft development plan documents as recently as 2017 as set out in previous representations made at Preferred Options stage.
- 1.4 Matter 4 of the Inspectors' Matters, Issues and Questions ('MIQs') considers the proposed allocations and safeguarded land in Bold (1EA, 1ES, 3HA, 4HA, 5HA), Eccleston (3HS), Sutton Manor (6HS), Thatto Heath (10EA, 9HA, 7HS) and St Helens Core Area (11EA, 6HA, 10HA, 8HS).
- 1.5 Several previous representations have been made by various parties throughout the Local Plan preparation process. This Statement responds directly to the Inspectors' MIQs, however, it should be read in conjunction with those previous representations. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework ('NPPF'), as supplemented by the National Planning Practice Guidance ('PPG').

¹ i.e. remove the site from Policy LPA06 as a safeguarded site and insert the site into Policy LPA05 as a housing allocation.

1.6 Separate representations are being submitted in respect of the following matters and should be read in conjunction with this Statement:

- Matter 1 – Introduction to the Hearings, Legal Compliance, Procedural, Requirements, and the Duty to Cooperate;
- Matter 2 – Housing and Employment Needs and Requirements;
- Matter 3 – Spatial Strategy and Strategic Policies;
- Matter 5 – Housing Land Supply; and,
- Matter 7 – Specific Housing Needs and Standards.

2. LOVELL'S RESPONSE TO MATTER 4

- 2.1 This section of this statement sets out the relevant Matter 4 issues and questions within the Inspectors' MIQs to which Lovell wishes to provide a response, including identifying elements/issues that render the plan unsound in the context of paragraph 35 of the NPPF, and how these should be resolved to make the plan sound.

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

15. Is the allocation of Site 4HA broadly consistent with the Bold Forest Park Area Action Plan?

- 2.2 NPPF paragraph 138 requires that Plans set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (see also PPG 64-002 and 64-003).
- 2.3 The Council's response to the Inspectors' Preliminary Questions (PQ47) states that the Council's proposed strategic compensatory improvement to offset the impact of removing land from the Green Belt is the implementation of the Bold Forest Park AAP (2017). Sites 4HA and 5HA are linked to this proposal.
- 2.4 Lovell does not object in principle to the allocation of Sites 4HA and 5HA. However, there is a clear issue with timescale of delivery. According to the Council's own trajectory (SHBC007), Site 4HA will not deliver until 2030/31 onwards and Site 5HA will not deliver until 2025/26 onwards. These two strategic sites will therefore not be delivered early in the plan period. There is therefore a need to allocate additional sites not only to deliver housing but also to contribute to the Bold Forest Park AAP objectives early in the plan period.
- 2.5 Site 4HA is clearly a very large and complex strategic site which will require comprehensive masterplanning and infrastructure improvements to enable it to come forward. As such, there is a strong probability that its delivery would be delayed even further beyond the Council's own anticipated trajectory (SHBC007), thus meaning that much of the compensatory improvements in relation to the Bold Forest Park will also not be delivered quickly.
- 2.6 In contrast, the site at Chapel Lane would deliver early in the plan period and contribute to the Bold Forest Park AAP objectives.
- 2.7 In its response to the Inspectors' PMIQs (SHBC001 – PQ47), the Council confirms that the policies within the BFP AAP seek to ensure that new development in the BFP contributes to the further enhancement of the BFP, including improving connectivity between the Borough's urban area and the Forest Park and contributing financially to the infrastructure of the park.

However, the Council's own Economic Viability Assessment (VIA001) found that whilst Site 4HA is considered to be viable, if education contributions or further S106 contributions are required for 4HA there may need to be some flexibility in relation to the hierarchy of planning contributions. The results for Site 5HA also show a very limited surplus. This analysis suggests that both sites 4HA and 5HA will struggle to deliver a policy compliant level of affordable housing and/or other contributions on the basis of viability. As a result, their ability to provide or contribute to compensatory improvements to BFP AAP may be restricted or prevented.

- 2.8 As set out in the detailed Development Statement provided at **Appendix I**, the Chapel Lane site (Site 6HS) provides opportunities to provide ecological enhancements and to link woodland and green spaces on the site and within the ownership blue line, to surrounding green infrastructure, including the Bold Forest Park.
- 2.9 The Chapel Lane site provides the opportunity to contribute to the objectives of the Bold Forest AAP and thus to the Council's strategy for Green Belt compensation. It is well located to provide strong connections to and to deliver extensions to the proposed strategic link routes, improving connectivity to the wider park, enhancing the landscape through additional tree planting and contributing to ecological enhancements. The blue line (land under control of Lovell) includes approximately 2.29 hectares of woodland which was previously included within the site assessed by the Council as part of its 2016 and 2018 Green Belt Reviews. This woodland is proposed to remain in the Green Belt. It also includes approximately 1.60 hectares of land to the south of Pendlebury Brook which will also remain in the Green Belt but will provide compensatory improvements including managed public access and to provide landscape, visual amenity and biodiversity enhancements capable of delivery early in the plan period.

Comments on Soundness in respect of Issue 2

- 2.10 When considering the tests of soundness set out in NPPF paragraph 35 in the context of Issue 2 of Matter 4, the Plan as submitted is not sound as it is **not consistent with national policy** and **not effective** because there is not currently any policy mechanism contained within the plan which sets out how the proposed compensatory Green Belt improvements will be achieved to offset against the loss of Green Belt land.
- 2.11 Furthermore, it is clear from the Council's own trajectory that sites 4HA and 5HA will not deliver housing early in the plan period, and thus will not deliver the compensatory improvements to offset the impact of removing this land from the Green Belt through the Bold Forest Park until later in the plan Period subject to viability testing, as identified by the Council's own Viability Assessment (VIA001). In contrast, the Chapel Lane site (Site 6HS) will deliver 100% affordable housing early in the plan period and contribute to the Bold Forest Park AAP objectives through on site Green Belt compensatory works and off-site provision.

- 2.12 To make the plan sound in this regard, SHMBC should insert a specific policy into the plan which sets out clearly how Green Belt compensation will be secured and how the Bold Forest Park is proposed to be delivered, with reference to the adopted AAP, either through developer contributions to deliver the strategic objectives, or through on-site measures to complement and assist on delivering the wider action plan and its objectives.
- 2.13 The Chapel Lane site should be allocated for housing under Policy LPA05 and the policy wording can specifically include reference to the site and its early contributions towards the Bold Forest Park AAP (see 2.9 above).
- 2.14 Lovell would also support an amendment to the wording of Policy LPA05 to secure the development as an affordable housing development in accordance with the definition of affordable housing set out in the NPPF.

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

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

- 2.15 Please see Lovell's response to Matter 3, Issue 2: Green Belt and Exceptional Circumstances², an extract of which is attached at **Appendix II**.
- 2.16 In summary, Lovell fully agrees with the Council's conclusion that exceptional circumstances exist to justify the release of land from the Green Belt.
- 2.17 The question of "exceptional circumstances" has been considered in a number of cases in recent years.³ In *Keep Bourne End Green*, Holgate J summarised the approach in the earlier case of *Compton* as follows [146]:

"I begin by summarising principles set out by Sir Duncan Ouseley in Compton Parish Council v Guildford Borough Council [2020] JPL 661 at [68]-[72]:-

(i) There is no definition of the policy concept of "exceptional circumstances". The expression is deliberately broad and not susceptible to dictionary definition. The matter is left to the judgment of the decision-maker in all the circumstances of the case;

² Lovell's Response to Matter 3 paragraphs 2.18-2.49.

³ *Compton PC v Guildford BC* [2019] EWHC 3242 (Admin); [2020] JPL 661 [68]-[72] (Sir Duncan Ouseley sitting as a High Court Judge) []; *Keep Bourne End Green v Buckinghamshire Council* [2020] EWHC 1984 (Admin); [2021] JPL 181, [146]-[148], both considering the earlier judgment in *Calverton Parish Council v Nottingham City Council* [2015] EWHC 1078 (Admin), [50]-[51]

(ii) Whether a factor is capable of being an exceptional circumstance may be a matter of law, as an issue of legal relevance. But whether it amounts to such a circumstance in any given case is a matter of planning judgment;

(iii) But the suggestion that a factor is legally incapable of amounting to an exceptional circumstance will generally require caution and judicial restraint. The breadth of the phrase and the array of circumstances which may qualify as “exceptional” indicate that judicial emphasis is very much more on the rationality of the judgment made by the decision-maker than on seeking to define what can or cannot amount to “exceptional circumstances”;

(iv) “Exceptional circumstances” is a less demanding test than the “very special circumstances” test (as explained in paragraphs 87-88 of NPPF 2012 and now paragraphs 143-144 of NPPF 2019) used in development control in the green belt;

(v) There is no requirement that green belt land may only be released as a last resort,

(vi) There is no requirement to show that the assumptions upon which a green belt boundary was originally drawn up have been falsified by subsequent events;

(vii) Exceptional circumstances may comprise one factor or a combination of factors of varying natures;

(viii) General planning needs, for example general housing, are not excluded from amounting to exceptional circumstances. The need does not have to relate to a special form of housing or to a particular level of intensity.”

2.18 It is therefore now well-established that the ‘test involves plan-wide strategic considerations. A copy of the relevant extract⁴ referred to above is contained at **Appendix III**.

2.19 However, it is possible to consider the site-specific features of any area that is proposed for removal from the Green Belt. It is not, however, *necessary* to establish specific factors relating only to the site itself as justification for its removal from the Green Belt.

2.20 In principle, general strategic factors such as (unmet) housing need, whether or not coupled with other factors, are capable of amounting to an exceptional circumstance justifying removal of land from the Green Belt.

2.21 In this case, the most important question is not whether there are exceptional circumstances. That is plainly the case. The central question is whether the Council have allocated enough land to meet the needs, which form a core part of the exceptional circumstances case.

⁴ Keep Bourne End Green v Buckinghamshire Council [2020] EWHC 1984 (Admin) [2021]

- 2.22 The Council's approach to identifying both allocated and safeguarded sites to attempt to ensure that the changes to the Green Belt can endure well beyond the Plan period will only be consistent with national policy, if it ensures that the needs are actually met (NPPF paragraphs 35a and 35c).
- 2.23 As explained in its response to Matter 5, Lovell does not consider that the currently proposed allocations are sufficient or will be effective at meeting the Borough's overall housing needs and particularly affordable housing needs and therefore suitable sites proposed for safeguarding, such as the Chapel Lane site (Site 6HS), should be upgraded to allocations to ensure that this need is met.

25. If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?

- 2.24 Whilst exceptional circumstances for Green Belt release have been clearly demonstrated through SHMBC's evidence base⁵, this is not clearly articulated within the Plan itself as submitted.
- 2.25 Policy LPA02: Spatial Strategy (4) states:
- "This Plan releases land from the Green Belt to enable the needs for housing and employment development to be met in full over the Plan period from 1 April 2020 until 31 March 2035, in the most sustainable locations. Other land is removed from the Green Belt and safeguarded to allow for longer term housing and / or employment needs to be met after 31 March 2035."*
- 2.26 Supporting paragraph 4.6.9 then states (with Asteer's emphasis in **bold**):
- "The Council will also give continued priority to the development of suitable and available sites within urban areas. However, **due to the lack of sufficient capacity on these sites to meet needs, and the lack of any scope to help meet the Borough's needs in any neighbouring district**, some sites on the edges of existing settlements have been removed from the Green Belt by this Plan and allocated for development in the period up to 2035."*
- 2.27 Therefore, Policy LPA02 and its supporting text contain a broad description of the exceptional circumstances.
- 2.28 The importance of fully explaining the basis for exceptional circumstances is illustrated by another recent case: Aireborough Neighbourhood Forum v Leeds CC [2020] EWHC 1461 (Admin), [98]-[107], see notably [99]-[100] in which the court noted the absence of an

⁵ Green Belt Review (December 2018)

explanation referring to a spatial strategy rationale of geographical distribution of Green Belt release.

2.29 The supporting text to Policy LPA02 should however set out the detailed rationale for the changes to the Green Belt boundaries and why this has been deemed necessary with explicit reference to national policy and the findings of SHMBC Green Belt Review, which are:

- I) The St.Helens Unitary Development Plan (1998) and the St Helens Core Strategy (2012) both aimed to focus most new development onto previously developed land in urban areas. The Core Strategy states that 80% of new housing developed between 2003 and 2027 should be built on such land. However, the Core Strategy identified a potential need for Green Belt release to meet needs for new housing from 2022 onwards.
- II) 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.
- III) Due to the lack of sufficient capacity on these sites to meet needs, and the lack of any scope to help meet the Borough's needs in any neighbouring district, some sites on the edges of existing settlements are proposed to be removed from the Green Belt and allocated for development in the period up to 2035. Some other sites are proposed to be removed from the Green Belt but, rather than being allocated for development, have been safeguarded to meet potential longer term development needs after 2035.

26. Is the configuration and scale of the safeguarded land justified taking into account long-term development needs and the Green Belt assessments?

2.30 Please see Lovell's Response to Matter 3, Issue 3: The principle of safeguarded land being identified to meet longer-term development needs, an extract of which is contained at **Appendix IV**.

2.31 The Council have attempted to adopt a practical and balanced approach to the designation of safeguarded land. However, the primary question is whether such land should be allocated now, rather than merely safeguarded. In the Chapel Lane site (6HS), safeguarding is the wrong approach. Allocation is the appropriate way forward.

2.32 As referenced in the Council's response to PQ45, it has not used a specific methodology for calculating post-plan period needs and has instead undertaken a rudimentary calculation which takes the estimated combined capacity of the sites safeguarded for housing, which gives a rough figure of between 5.4 and 6.5 years supply.

- 2.33 Whilst the Council has sought to identify a reasonable amount of land to be safeguarded in order to meet future development needs and avoid further changes to the Green Belt boundary, there is a real risk that the quantum of safeguarded land has been underprovided when considered in the context of housing need and supply within the plan period.
- 2.34 This is why allocation is the correct approach for Land at Chapel Lane. The 10 proposed Local Plan allocations and the other claimed sources of supply in the Council's trajectory will deliver significantly fewer dwellings than the Council claims (Document ref: SHBC007 – updated employment and housing land supply information document, May 2021)) (see our Main Matter 5 Hearing Statement). In particular, they will deliver far fewer affordable dwellings than needed to meet the overriding need in the Borough.
- 2.35 The Council will not be able to demonstrate a 5 year supply upon adoption of the plan. This has recently been acknowledged by the Council in its latest published housing land supply position (SHBC007 Appendix 2) in which it identifies a 4.6 year supply of deliverable housing land. The Council will therefore need to allocate additional deliverable sites such as the Chapel Lane site (6HS) to meet immediate rather than longer term development needs, including affordable housing need.

27. Should any of the safeguarded sites be allocated rather than safeguarded so that they can contribute to meeting needs in the Plan period?

- 2.36 Yes, in our submission, this is the appropriate action with regard to Chapel Lane (6HS).
- 2.37 As detailed above, the Council must allocate additional sites now in order to meet both its overall housing need and affordable housing need.
- 2.38 This Hearing Statement is supported by a detailed Development Statement contained at **Appendix I** which presents an analysis of the Chapel Lane site and its surroundings and sets out in detail, the case for the removal of the site from the Green Belt to meet the Borough's housing needs during the Plan period and the suitability, availability and deliverability of the site for early housing development.
- 2.39 The Chapel Lane site was previously identified as a proposed housing allocation (Site HA4) in the previous Preferred Options Local Plan Document which was consulted on between December 2016 and 30 January 2017. As such, it has already been acknowledged by the Council through its own evidence base that the site is suitable for release from the Green Belt and that its development for housing would not prevent the wider Green Belt from meeting the five purposes set out at NPPF Paragraph 134.
- 2.40 Our own assessment of the site against the five purposes is set out at page 14 of the Development Statement contained at **Appendix I**.

- 2.41 We refer to our response to Matter 3, Issue 2 (Green Belt and Exceptional Circumstances), which sets out that the Council's assessment of the site in the 2018 Green Belt Review is flawed for the following reasons:
- I) There is a distinct lack of justification as to why the Chapel Lane site scored only 'Medium' on deliverability (Stage 2b) and has been downgraded from an allocation to a safeguarded site;
 - II) The 2016 Green Belt Review assessed the entire site and concluded that there would be low Green Belt impact provided woodland is preserved which screens the site from the west and that the site should be promoted for allocation;
 - III) Within the 2018 Green Belt Review, the Council appears to have changed its conclusions in respect of the site without any (or any robust) evidence to justify this. The Stage 2B assessment assesses a wider parcel. It also includes inaccuracies and fails to provide any correlation between the commentary and the developability score attributed to the site.
- 2.42 The Council published its Stage 2B Proformas in October 2020 (Document Ref: SD021) which assessed the Green Belt parcels and sub-parcels not discounted at Stages 1B and 2A. A copy of the Stage 2B proforma for the site is contained at **Appendix V**. Within the Stage 2B assessment, the Council has not fully assessed the Chapel Lane site in isolation but as part of a wider parcel (GBP_082 which includes GBP_082_A, GBP_082_B and GBP_082_C). For some of the criteria, the assessment is clearly split by sub-parcel and for some criteria, the commentary refers to the wider parcel.
- 2.43 It is Lovell's view that this is an inappropriate and inconsistent approach and that the Chapel Lane site (Ref: GBP_082_A) should be assessed on its own merits. Furthermore, there are inaccuracies in how the Chapel site has been assessed in the context of the development proposed e.g. in relation to net developable area, density and site constraints.
- 2.44 Lovell has therefore undertaken its own assessment of the site against the Council's Stage 2b pro-forma, contained at **Appendix VI** which demonstrates that the site is fully deliverable and should be scored as having 'High Development Potential' resulting in a quantitative overall score of '6' (the highest possible score) and as a result, allocated for housing development rather than safeguarded.
- 2.45 As detailed at Section 4 of the Development Statement, the masterplan for the site has been carefully designed to respect and complement the context and setting of the site. It is tailored to suit local housing requirements by delivering approximately 150 affordable dwellings. These will be located within an extensive mature landscaped setting. In addition to delivering much needed local housing, the development will deliver a multi-functional greenspace network

which will enhance connectivity between the urban area and the rural fringes for the benefit of local communities, while also complementing the objectives of Bold Forest Park.

- 2.46 The site will be brought forward through a Joint Venture between Lovell and Together Housing Group who have secured a legal agreement with the landowner of the site. The site is therefore in control of a major reputable housing developer and Registered Provider and can be developed to provide up to 150 affordable dwellings to meet the critical affordable needs of the Borough. A letter of support from Together Housing Group which confirms its commitment to the delivery of the site is contained at **Appendix VII**.
- 2.47 If the site is allocated and removed from the Green Belt, Lovell will then proceed to submit a planning application to develop the site immediately. In doing so, they would contribute to the Borough's 5-year housing land supply (which cannot currently be demonstrated upon adoption). The site is therefore **available** in the context of the NPPF⁶.
- 2.48 The Council's own assessment of its trajectory (SHBC007) demonstrates that there will only be a 4.6 year supply. Lovell's view is that this figure will actually be much lower, as set out in its response to Matter 5. However, should the Inspector agree with the Council's position, the allocation of the Chapel Lane site for 150 dwellings would present an opportunity to boost the supply to just below 5 years.
- 2.49 The site is suitable for residential development for the following reasons:
- It will form a natural extension to the established area of Sutton;
 - It will retain the area of woodland adjacent to the site, as well as providing approximately 1.60 hectares of land to the south of Pendlebury Brook both of which will remain in the Green Belt and provide compensatory improvements including managed public access and to provide landscape, visual amenity and biodiversity enhancements, as set out in further detail in the Biodiversity Enhancement Measures Report contained at **Appendix VIII**;
 - It will contribute to meeting the objectives of the Bold Forest AAP including enhanced access to leisure opportunities;
 - It will offer a rare and unique opportunity to contribute to meeting the Borough's critical affordable housing needs through an already established joint venture between a reputable housebuilder and RP;
 - There are no identified environmental constraints which would prevent the development of the site for 150 dwellings;

⁶ NPPF Annex 2: Glossary

- Development could utilise the existing infrastructure of the surrounding area and there are no drainage or utilities constraints which could prevent the site coming forward;
- A safe and satisfactory access from Chapel Lane can be accommodated and the site is situated within a local highway network which has the capacity to accommodate these additional dwellings as demonstrated in the Transport Assessment contained at **Appendix IX**;
- The development will deliver new open space for use by new and existing residents; and provide compensatory Green Belt improvements on additional land within Lovell's control;
- The site is sustainably located and close to existing bus stops and local services and facilities.
- It can be developed immediately following its allocation and removal from the Green Belt;
- It will provide significant economic benefits including council tax receipts of circa £298,089 per annum and total resident expenditure of over £4.6m per annum, as well as approximately 349 direct FTEs during the construction phase and 10 permanent FTEs during the operational phase;
- It does not make a contribution to the five purposes of the Green Belt in this location or overall, which has been acknowledged by the Council through its own Green Belt Review and its decision to remove the site from the Green Belt.

2.50 The site is therefore suitable in the context of the NPPF ⁷.

2.51 The site has been fully assessed in terms of its potential constraints. This illustrates that the delivery of the site is achievable and deliverable and a team of technical consultants has been appointed to support the delivery of this site moving forward. Where technical constraints are identified, appropriate mitigation and investment in the site will be provided to ensure delivery. A viability assessment of the site has been undertaken including land values, market demand and potential sales within the Borough.

2.52 On this basis, the site is economically viable and is therefore **achievable** in the context of the NPPF⁸.

2.53 Appendix 7 of the submitted Plan sets out site profiles for each of the safeguarded employment and housing sites. The site profile for the Chapel Lane Site (Site 6HS) is contained at

⁷ NPPF Annex 2: Glossary

⁸ NPPF Annex 2: Glossary

Appendix X and a version with the Council's proposed modifications at **Appendix XI**. The proposed development will meet all of the Council's proposed site-specific requirements as demonstrated in Lovell's assessment of the site / proposals against these requirements, contained at **Appendix XII**.

- 2.54 Furthermore, Lovell has carried out several technical assessments which have not identified any constraints that would preclude development of the site. These are summarised at Section 4.0 of the Development Statement contained at **Appendix I**.
- 2.55 In summary, the site is entirely **suitable**, **achievable** and **deliverable** for residential development following removal from the Green Belt and allocation for housing. Lovell is committed to working collaboratively with the Council and key stakeholders to bring forward a high-quality 100% affordable scheme that will enhance the natural environment, maintain the core functions of the Green Belt and contribute to meeting the Borough's future housing needs, including its critical need for new affordable housing, in a sensitive and sustainable manner.
- 2.56 The site forms a natural extension to the urban area, has sustainable access to facilities, can be safely accessed via the existing highways network and will have an acceptable impact on the environment. Lovell therefore seeks a modification making an alteration to the Green Belt boundary and the allocation of the site for housing through the new Local Plan.
- 2.57 It is critical that deliverable sites such as the Chapel Lane site are allocated now rather than safeguarded so that they can contribute to meeting housing needs in the Plan period. The site also offers a unique opportunity to bring forward a 100% affordable scheme through a joint venture partnership which will contribute approximately 150 mixed tenure affordable homes not only during the Plan period but within the first five years.
- 2.58 The Chapel Lane site is the safeguarded site which is most likely to be delivered for a number of reasons, not least its size, lack of technical constraints and the fact that it also has a committed developer and RP on board.
- 2.59 Questions have been asked of the Council on other site allocations, safeguarded sites and the supporting evidence base (INSP055). In particular, these concern safeguarded site 3HS (Former Eccleston Park Golf Club) and 8HS (Land south of A580, Windle). No specific concerns have been raised regarding the Chapel Lane site (6HS).

28. Are the requirements for the sites within Appendix 7 (Site Profiles) necessary, positively prepared and effective?

- 2.60 Appendix 7 of the submitted Plan sets out a site profile for Chapel Lane site (contained at **Appendix X** of this Statement). Lovell, however notes that the site profile for the Chapel Lane site is proposed to be modified, as set out in the Council's Draft Schedule of Modifications

(Ref: SHBC010). The proposed modifications include the deletion of two of the site specific requirements relating to open space and design and layout and the inclusion of an additional site-specific requirement requiring measures to secure suitable access to and through the site by walking, cycling, public transport and other sustainable modes. A copy of the proposed modifications to the Site Profile for Site 6HS is contained at Appendix XI.

- 2.61 Lovell has undertaken its own assessment (**Appendix XII**) to demonstrate how the proposed development of the site will meet the site-specific requirements including the additional requirement proposed within SHBC010.

If Site 6HS is allocated, all of the site-specific requirements (as modified) could be met. The site is therefore necessary, positively prepared and effective. If the site is allocated, the site profile for the Chapel Lane site would be very simply moved from Appendix 7 of the submitted plan (Safeguarded Site Profiles) to Appendix 6 of the submitted plan (Allocations Site Profiles).²⁹ Are the net developable areas, minimum densities and indicative site capacities within Table 4.8 justified and effective?

- 2.62 Table 4.8 (Safeguarded Land for Housing) of the submitted Plan sets out details of each of the proposed safeguarded sites. For the Chapel Lane site (site 6HS), it states that the area of the site is 5.0ha, the Net Developable Area (NDA) is 75% and density in dwelling per hectare (DPH) is 30dph which gives an indicative capacity of 113 dwellings.
- 2.63 The capacity of 113 units on the site is indicative only. It has been calculated based upon an assumed 75% NDA and a density of 30 dwellings per hectare. As further acknowledged at footnote 37 of Table 4.8 of the submitted Plan (page 51): *“the capacity of each safeguarded site would be assessed further prior to any decision to allocate it for development in a future Local Plan.”*
- 2.64 As demonstrated in the Development Statement at **Appendix I**, Lovell is proposing a development of approximately 150 dwellings on the site which is based on a NDA of 80% and a maximum density of 37dph. This is an appropriate dwelling density for a 100% affordable housing development, which potentially has capacity to include small apartment buildings and a higher proportion of 2-3 bed dwellings, and which is significantly enclosed by vegetation, ensuring that the development will have extremely limited visibility within its context. As there is significant additional land available within the other blue land controlled by Lovell for uses associated with the proposed development, including sensitively designed POS provision, there is an opportunity for the development potential of the, less sensitive, red line area to be maximised.

Comments on Soundness in respect of Issue 3

- 2.65 When considering the tests of soundness set out in Paragraph 35 of the NPPF in the context of Issue 3 of Matter 4, the Plan as submitted is not sound as it: i.e **not positively prepared, not justified, not effective and not consistent with national policy** for the following reasons:
- i) SHMBC has identified a number of housing allocations to meet housing needs during the plan period however Lovell does not consider that the currently proposed allocations are sufficient or will be effective at meeting the Borough's overall housing needs and particularly affordable housing needs.
 - ii) In order to meet its housing need during the plan period, and specifically the overriding affordable housing need, SHMBC needs to allocate additional sites for housing to come forward during the plan period, prioritising proposed safeguarded sites, such as the Chapel Lane site, which have already been identified by SHMBC as suitable for Green Belt release.
 - iii) The Chapel Lane site should be allocated now because it has been demonstrated through the detailed Development Statement at **Appendix I** that it is suitable, available and achievable.
- 2.66 In order to make the plan sound in this regard, SHMBC should allocate additional deliverable sites now, including the Chapel Lane site, to ensure that the Borough's needs for housing, including affordable housing, can be met both during the plan period and within the first five years.
- 2.67 Lovell would support an amendment to the wording of Policy LPA05 to include details of the Chapel Lane site, its contribution to the Bold Forest Park and additional wording to secure the development as an affordable housing development in accordance with the definition of affordable housing set out in the NPPF.
- 2.68 The Chapel Lane site offers a truly unique opportunity to bring forward a 100% affordable scheme through an established joint venture partnership which will contribute approximately 150 mixed tenure affordable homes not only during the Plan period but within the first five years.

APPENDIX I LOVELL'S DEVELOPMENT STATEMENT (MAY 2021)



Land at Chapel Lane, St Helens

Development Statement

May 2021

LOVELL
PARTNERSHIPS

A MORGAN SINDALL GROUP COMPANY

LOVELL PARTNERSHIPS

A MORGAN SINDALL GROUP COMPANY

For more information please contact:

Lovell Partnerships Limited (Part of the Morgan Sindall Group)

St Johns House

Barrington Road

Altrincham

Cheshire

WA14 1JY

Land at Chapel Lane, St Helens Development Statement

LOVELL
PARTNERSHIPS

A MORGAN SINDALL GROUP COMPANY

Contents

1. Introduction..... Page 1
2. Land at Chapel Lane and its context..... Page 3
3. Case for Green Belt release..... Page 7
4. Masterplan..... Page 13
5. Suitability and deliverability of the site..... Page 21
6. Conclusions..... Page 27



Section 1.0 Introduction

The Land at Chapel Lane, Sutton (“the site”) represents a logical and appropriate extension to the existing urban area. The site is sustainable with good access to a range of existing services and facilities and offers an opportunity to deliver around 150 high quality affordable homes which will make a positive contribution to both St Helens’ overall housing need and its affordable housing need.

Purpose of the Development Statement

This Development Statement has been prepared by Lovell Partnerships Limited (“Lovell”) to promote the site for Green Belt release and housing allocation of the site to deliver 100% affordable housing within the St Helens Local Plan (“SHLP”). St Helens has a critical need for new homes which cannot be met within the existing urban areas, as well as an acute affordable housing need. As a result, it has been firmly established by the Council that sensitive Green Belt release will be required to meet this demand. The site’s release from the Green Belt and its allocation for housing would represent a wholly logical and appropriate alteration to the Green Belt in St Helens.

This Development Statement presents an analysis of the site and its surroundings and sets out in detail, the case for the removal of the site from the Green Belt and allocation for housing. This includes a review of the current and emerging planning policy position and an assessment of the site against the five purposes of the Green Belt. The Development Statement then sets out the Vision for the site, informed by a consideration of the constraints and opportunities and an Illustrative Masterplan demonstrating how the Vision can be achieved through a sensitively designed residential scheme. The document then assesses the sustainability of the site against the overarching pillars of sustainable development and provides a review of key technical considerations before demonstrating that the site is available, suitable and achievable. The document concludes with a concise summary of the site, the proposed development and its key benefits.

Summary of case for Green Belt release

The St. Helens Green Belt has not been substantially altered since it was established by the Merseyside Green Belt Local Plan in 1983. It is now necessary to review and amend the Green Belt boundaries if sufficient land is to be allocated to meet the Borough’s development needs for the next 30 years.

The allocation of the site in the SHLP would present a unique opportunity to deliver sensitive Green Belt release and provide much-needed affordable housing for the Borough of St. Helens. The site is sustainable due to its proximity to the existing urban area and the associated services, facilities and transport links within it.

Lovell is keen to ensure that the proposed development is informed by collaborative dialogue between key stakeholders, including the Council and the local community. Doing so will enable the development of a high-quality housing scheme that respects the character of the area and the environment and offers a multitude of environmental, social and economic benefits. In addition, the site can provide unique green infrastructure enhancements such as providing public access to existing woodland, enhancing access to the wider Bold Forest Park, ecological enhancements, Green Belt compensation and leisure opportunities.

Given the site’s favourable position directly adjacent to the existing urban area, the development of the site for housing would not prevent the Green Belt from achieving its purpose and functions in this location.

Figure 01
Site location plan



Lovell – Together Partnership

Lovell would bring forward this development through a Joint Venture with the Together Housing Group. Lovell - Together Corporate Joint Venture LLP is an existing special purpose vehicle under which this site would be delivered.

Lovell - Together have a number of existing projects across the north west including a strategic masterplan for 1,000 homes in Pendleton, Salford.

Together Housing Group have an ambition to deliver over 3,000 new mixed tenure and affordable homes between 2020-2025, with a focussed growth plan for the M62 and M56 corridor.

Together Housing Group are a Homes England Strategic partner and have an existing £53m of Homes England grant allocation secured to give greater certainty on delivery. Homes would be delivered to a high standard of design and specification using Lovell’s national range of tenure blind homes.

Section 2.0 Land at Chapel Lane and its Context

The site is wholly sustainable and represents a logical and natural extension to the existing built up urban area. It comprises agricultural land that lies to the east of Chapel Lane and to the south of Walkers Lane. The site is located immediately to the south-west of Sutton and to the south of Lea Green Business Park.

Site description

The Land at Chapel Lane extends to approximately 5.13 hectares and comprises arable farmland contained by an extensive area of mature woodland at the south-west of the site which links to a further area of vegetation enclosing the east of the site. The site boundaries comprise post and barbed wire fencing with some dispersed trees and hedgerows. The site is naturally contained to the east by the sloped land and vegetation between an existing drain and the Pendlebury Brook. The site otherwise has a relatively flat topography. There are no buildings or public rights of way (PRoW) located within the site, although the remains of the former mushroom buildings associated with former industrial uses are present in the east of the site. These have now been demolished to prevent anti-social behaviour.

Additional parcel for Green Belt compensation

The blue line (land under the control of Lovell) also includes:

- Approximately 2.29 hectares of woodland which was previously included within the site assessed by the Council as part of its 2016 and 2018 Green Belt Reviews. This woodland is proposed to remain in the Green Belt; and,
- Approximately 1.60 hectares of land to the south of Pendlebury Brook which will also remain in the Green Belt but will provide compensatory improvements including managed public access and to provide landscape, visual amenity and biodiversity enhancements in the context of Paragraph 141 of the National Planning Policy Framework.

Site surroundings

The site abuts the south western edge of Sutton Manor in the Metropolitan Borough of St. Helens, Merseyside. It is bounded to the north and east by residential properties which vary in style and character and include bungalows, modern semi-detached houses and more traditional brick built detached properties. To the north of the site, Lea Green Business Park is accessed from Walkers Lane and comprises several industrial and business units. The site is bounded to the west by Chapel Lane, beyond which is agricultural land. There is further agricultural land, with some dispersed farm dwellings, to the south of the site.

Pendlebury Brook flows close to the south and east of the site, passing through the adjacent 'blue' land. The Brook does not fall within the area of land proposed for release from Green Belt.

The site sits within the Bold Forest Park which extends to the south and includes leisure opportunities such as the Sutton Manor woodland and "The Dream" sculpture.

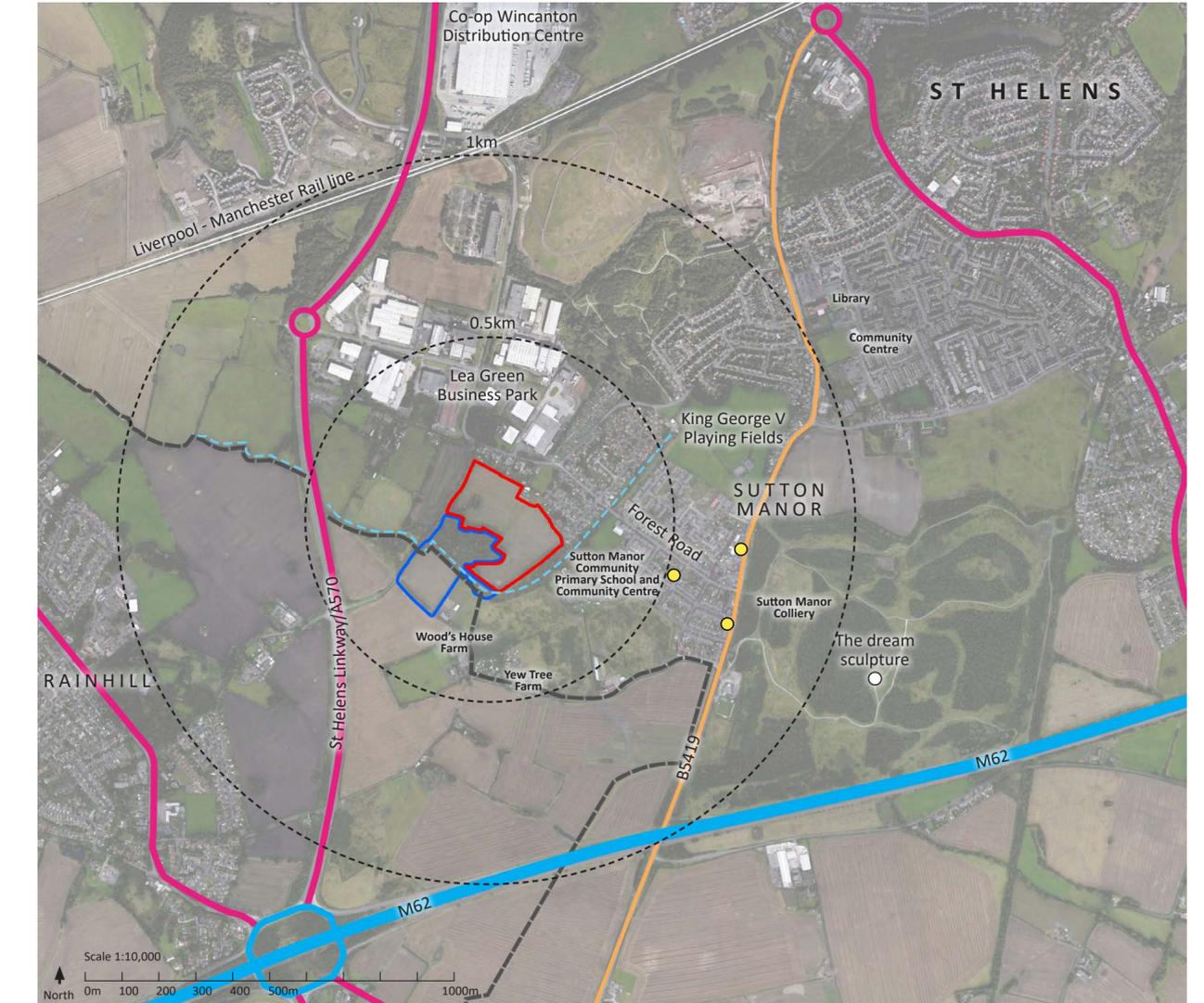
The site and its surroundings provide a unique opportunity to deliver much needed affordable housing in a green and picturesque setting whilst also making a contribution to the Bold Forest Park, Green Belt compensation and ecological enhancements.

Figure 02

Wider site context plan

KEY:

-  Site Boundary
-  Land to remain in Green Belt (proposed for Green Belt compensation and ecological enhancement)
-  Ward Boundary
-  Motorway
-  A roads
-  B roads
-  Watercourse
-  Key shops/ services



Land at Chapel Lane, St Helens Development Statement

Section 2.0 Land at Chapel Lane and its context

Landscape character

The Landscape Character Assessment (LCA) for St Helens Borough was published in 2006. The LCA undertakes a comprehensive landscape character assessment of the urban, urban-fringe and rural landscapes of the Borough of St Helens to inform future planning and development.

The LCA classifies the Borough landscape into distinctive areas. The site is located within the 'Floodplain Farmland' landscape character type and 'Sutton Manor Fringe' landscape character area.

The 'Sutton Manor Fringe' is described as a fragmented agricultural landscape that forms an edge with the residential and industrial edges of Sutton Manor to the north. The flat agricultural landscape is characterised by small to medium irregular fields with degraded field boundaries. The landscape also includes large industrial components, buildings, and former spoil heaps. A network of small narrow rural roads link through the area in contrast with the main roads located to the west and south.

The site is broadly typical of the landscape character area and is strongly associated with the adjacent urban area at Sutton Manor which abuts the site. It is also largely detached from the rural road network and the wider green corridor which extends northwards towards St Helens due to the established woodland which frames the southern and western site boundaries.

Appropriately designed development of the site provides an opportunity to respond to the LCA recommendations by improving the existing abrupt urban edge of Sutton Manor. This can be achieved by integrating existing and new landscape features into the development to create a 'transitional' character between urban and rural, while also retaining and enhancing strong landscape features such as the established woodland which visually contains the site to the south and west.

Views

In general, visibility across the 'Sutton Manor Fringe' is limited by flat topography, vegetated edges to field boundaries and road infrastructure, and the presence of small wooded areas, particularly on the fringes of Sutton Manor.

The majority of the site is visually contained by existing development to the north and by existing woodland vegetation to the south and east which is associated with the corridor of Pendlebury Brook. There are established trees along the western site boundary with Chapel Lane which filter long views to the site. The limited visibility of the site is consistent with the character of the 'Sutton Manor Fringe'.

At a local level there is some visibility into the site from Chapel Lane, where it immediately passes the site. There are also views from Wordsworth Drive cul-de-sac which fronts onto the north-eastern site boundary. Views from the recently constructed 'Forest Green' development off Walkers Lane are currently obscured by fencing.



Looking west across the site towards Chapel Lane

LOVELL
PARTNERSHIPS

A MORGAN SINDALL GROUP COMPANY

Views of the site from School Lane and Bell Lane, rural lanes to the south of the site, are restricted due to the existing vegetation on the site. There are no views of the site from any PRoW, including the PRoW which passes through undeveloped land to the south-east of the site linking School Lane to Preston Street.

Development on the site provides an opportunity to capitalise on a long glimpsed view to 'The Dream' in Bold Forest Park which will enhance the sense of character and place within the development.

Figure 03

Detailed site context plan

KEY:

-  Site Boundary
-  Land to remain in Green Belt
-  Ward Boundary
-  Motorway
-  A roads
-  B roads
-  Public Rights of Way
-  Watercourse
-  Key shops/ services

St Helens Unitary Development Plan

-  Green Belt GB 1-12



Section 3.0 Case for Green Belt release

National planning guidance

In February 2019, The Government published a revised National Planning Policy Framework (“NPPF”) which replaces the previous guidance published in 2012 and provides the overarching planning framework for England. Central to the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking (Paragraph 11). The NPPF also seeks to boost the supply of housing and requires local authorities to plan positively for objectively assessed needs and maintain a sufficient supply of housing land.

Paragraph 136 of the NPPF sets out that once established, Green Belt boundaries should only be altered in ‘exceptional circumstances’ through the preparation or updating of plans, and states that “strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”.

Paragraph 138 of the NPPF states that strategic policy-making authorities should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Paragraph 141 states that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

In the case of St. Helens, there are exceptional circumstances which justify alteration to the Green Belt boundary and the site at Chapel Lane offers an opportunity to release Green Belt in a sensitive manner, without harming its purposes and functions.

Adopted and emerging Development Plan

The current Development Plan for St Helens comprises:

- The Core Strategy Local Plan (adopted October 2012);
- Saved Policies of the 1998 Unitary Development Plan;
- The Joint Merseyside and Halton Waste Local Plan (adopted July 2013); and,
- The Bold Forest Park Area Action Plan (adopted July 2017).

The SHLP, which will replace the current adopted Development Plan, was submitted to the Secretary of State for Independent Examination on Thursday 29th October 2020.

Within the Submission Draft SHLP, the site at Chapel Lane is proposed as a safeguarded site for housing (Site 6HS) despite being previously identified as a housing allocation (Site HA4) in the previous Preferred Options Local Plan Document which was consulted on between December 2016 and 30th January 2017. A number of Green Belt sites proposed for allocation in the Preferred Options Local Plan were also downgraded to proposed safeguarded sites and several more proposed allocated / safeguarded sites were removed completely from the Plan.



Housing and garages backing onto the site from Walkers Lane

Housing need and exceptional circumstances

The Council’s Green Belt Review (December 2018) sets out clearly the Council’s position that exceptional circumstances exist to justify changes to the Green Belt boundaries which are as follows:

- i. The St. Helens Unitary Development Plan (1998) and the St Helens Core Strategy (2012) both aimed to focus most new development onto previously developed land in urban areas. The Core Strategy states that 80% of new housing developed between 2003 and 2027 should be built on such land. However, the Core Strategy identified a potential need for Green Belt release to meet needs for new housing from 2022 onwards.
- ii. 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.

Within the Preferred Options Local Plan (December 2016) a housing requirement of 570 dwellings per annum was proposed which reflected the adopted Core Strategy figure based on ambitious, economic-led growth aspirations for the Borough. The Council is now pursuing a significantly lower figure which represents a minor uplift on the local housing need calculated using the Government’s standard method (468 dwellings per annum). The Submission Draft Local Plan 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 units per annum.

However, regardless of the reduction in the overall housing need being pursued and brownfield capacity being maximised, there is still insufficient land within the existing urban areas to meet this need and therefore exceptional circumstances remain for targeted release of Green Belt land in order to meet identified needs.

To enable the housing and employment land targets to be met in full over the plan period, 10 site allocations are identified in the emerging SHLP to accommodate housing development within the Plan Period of which 4 are large brownfield sites in the urban area and 6 are to be removed from the Green Belt. 8 sites are also proposed to be removed from the Green Belt and safeguarded to meet potential housing development needs after 2035, including the site at Chapel Lane (Site 6HS).

Affordable housing need

There is an acute need for affordable homes in St. Helens with the most recent Strategic Housing Market Assessment (SHMA) Update (2019) identifying a net need for 117 affordable homes per annum between 2016 and 2033. The Council have overseen an addition of only 175 affordable dwellings in the last four years since 2016 which has resulted in a shortfall of -293 affordable homes compared to objectively assessed needs. To be met over the next five years, the shortfall amounts to a requirement of 176 dwellings per annum.

In addition, there are acute affordability issues in the Borough. St. Helens Council’s Indices of deprivation 2019 Summary Report shows that St. Helens is now ranked as the 26th most deprived local authority in England out of 317. Its relative position has deteriorated since the 2015 Index of Deprivation where St Helens was ranked as the 36th most deprived area (out of then 326 authorities). There are now a total of 29 neighbourhoods (Lower Super-Output Areas) within the Borough that fall within the 10% most deprived LSOAs nationally, compared to 28 in 2015. A total of 50 LSOAs within the Borough fall within the 20% most deprived nationally, compared to 47 in 2015. Bold Ward includes some of the most deprived areas, being within the most 1% deprived nationally.

If insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen and people will not have access to suitable accommodation to meet their needs. The delivery of an 100% affordable scheme on the site would make a very significant and positive contribution to meeting the affordable housing needs of the Borough.

Land at Chapel Lane, St Helens Development Statement

Section 3.0 Case for Green Belt release

St Helen's Green Belt Review and updated site boundary

SHMBC's Preferred Options consultation which was undertaken in 2016 was supported by a Draft Green Belt Review 2016 ('the 2016 Green Belt Review'), the findings of which were used to inform the Council's then preferred options for Green Belt release.

The Chapel Lane site was assessed at Stage 1 of the 2016 Green Belt Review as part of a wider parcel (Ref: GBP_082) also incorporating further land to the south and west (Site Refs: GBS_049 and GBS_111). The Stage 1B Parcel Assessment score for parcel ref: GBP_082 gave a score of 'Medium' against all 3 purposes assessed (Purposes 1, 2 and 3) and an overall significance score of 'Medium'.

The site was then assessed in isolation (Site Ref: GBS_140) through the subsequent Stages 2 and 3 which looked at site specific constraints. The red line boundary for site GBS_140 included wider site than is now proposed for release from the Green Belt in the Submission Draft Local Plan. The wider site included the woodland area to the south west.

The Stage 4 site summary concluded that the Chapel Lane site ranks 1 of 3 in the hierarchy of the other sites within the parcel (sites GBS_049 and GBS_111) and that the impact on Green Belt if the site is allocated would be low. It concluded that there will be low Green Belt impact provided the woodland is preserved which screens the site from the west and that the site should be promoted for allocation.

A further Green Belt Review (December 2018) was undertaken as part of the SHLP evidence base as the Council had identified a shortfall of suitable land within its existing urban areas. Within the 2018 Green Belt Review, the site (Parcel Ref: GBP_082a - Land East of Chapel Lane and South of Walkers Lane, Sutton Manor) was assessed again. At Stage 1b (Purposes of the Green Belt) it scored 'Low' and at Stage 2b (Developability Assessment) it scored 'Medium'.

The Council then attributed an overall numerical score, by adding the score for Stage 2B to that for Stage 1B. The Chapel Lane site was given an overall score of 5 (just one point below all of the sites that were allocated). The commentary in Table 5.4 at page 111 provides comments on the Council's decision to safeguard the site and states that *"the sub-parcel was proposed by the Council as an allocated housing site at LPPO stage. However, its characteristics, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to it."*

The commentary then goes on to state that the site is *"further from the nearest local centre than is the case for example for the nearby parcel GBP_080. It is now seen as being more suitable to form a longer term extension of the urban area, which could contribute to meeting housing needs after the end of the Plan period."*

Whilst Lovell fully supports the Council's overall decision to remove the site from the Green Belt, it is noted that the red line boundary for Parcel ref: GBP_082a in the 2018 Green Belt Review covers the entire site including the woodland area. This differs from the area which is proposed for development by Lovell and the area that is proposed to be safeguarded in the Submission Draft Local Plan. Lovell is supportive of the proposed safeguarded land boundary which excludes the woodland as this will provide SHMBC with the comfort and clarity that the woodland area will not only be preserved but will remain within the Green Belt and thus be subject to the strict policy restrictions that a Green Belt designation affords.

It should also be noted that the 2018 Green Belt Review included the following text:

"The sub-parcel contains protected woodland and a LWS (Pendlebury Brook). A significant buffer would be required for both these areas to ensure their continued protection; an appropriate reduction in the NDA of the site would be applied to accommodate these assets."

As opposed to the red line boundary used in the Green Belt Review, the site boundary does not include the Pendlebury Brook LWS and the Illustrative Masterplan shows existing and proposed woodland buffers to protect the Brook and LWS, as well as new woodland creation to the south of the Brook.

The remainder of this section of the Development Statement assesses the site against the five purposes of Green Belt set out at Paragraph 134 of the NPPF. It also considers the compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land to the south (within the blue line ownership/control) of Lovell in the context of Paragraph 138 of the NPPF.

LOVELL
PARTNERSHIPS

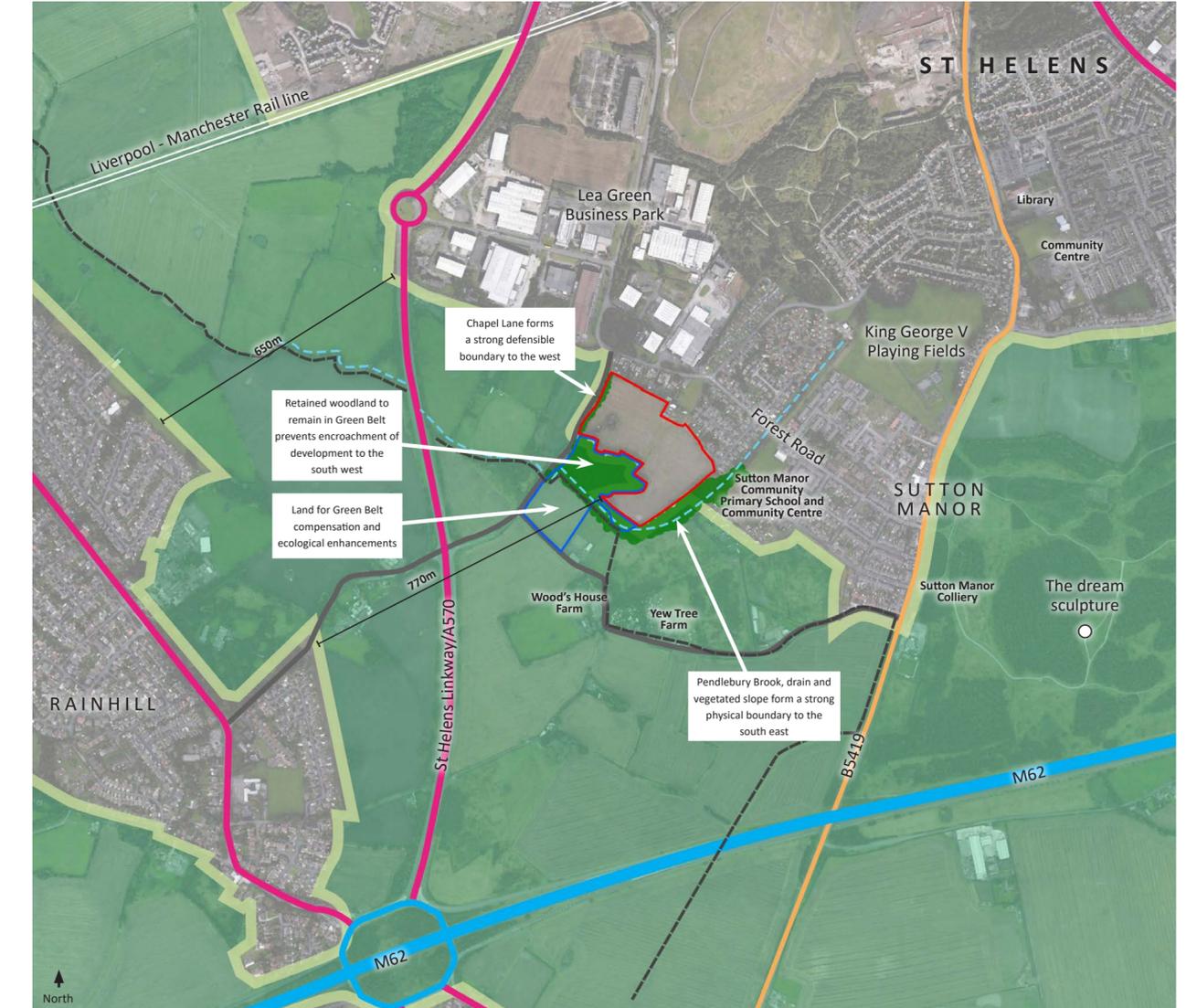
A MORGAN SINDALL GROUP COMPANY

Figure 04

Green Belt plan

KEY:

-  Site Boundary
-  Land to remain in Green Belt and provide compensatory improvements
-  Ward Boundary
-  Motorway
-  A roads
-  B roads
-  Watercourse
-  Existing vegetation retained
-  Proposed revised Greenbelt



Land at Chapel Lane, St Helens Development Statement

Section 3.0 Case for Green Belt release

Five purposes of the Green Belt

Paragraph 134 of the NPPF sets out five purposes of the Green Belt. The development of the site for residential development would not prevent the Green Belt from functioning effectively against these five purposes. This has already been acknowledged by the Council through its own evidence base, reflected in its decision to allocate the site at Preferred Options stage and then to remove the site from the Green Belt and safeguard it for future housing needs through the Submission Draft Local Plan. An assessment of the site against the five purposes is set out below:

To check the unrestricted sprawl of large built-up areas

The site forms a logical extension to the existing urban area and would provide for the natural expansion of the settlement. The site is bound to the north by residential properties. Chapel Lane forms a strong, permanent defensible boundary to the west of the site and the area of woodland to the south of the site would be retained as part of the development, providing a strong, permanent and long term defensible boundary to prevent encroachment into the Green Belt to the south. The Pendlebury Brook, drain and sloping vegetated ground inbetween provide a strong physical boundary to the east of the site. The site has defensible boundaries on all sides and would form a natural extension to the existing urban area. As such, the site is not required to check the unrestricted sprawl of the existing built-up area.

To prevent neighbouring towns from merging into one another

The removal of the site from the Green Belt would not reduce the separation distances between the built up urban area and the nearest neighbouring settlement of Rainhill. The resultant gap between the site and Rainhill would be around 770m, which is further than the current narrowest separation distance of 685m between the two areas.

Development of the site would not result in the merging of neighbouring towns and would maintain the functions and separation of the Green Belt in this location. Furthermore, the two areas are physically separated by the St. Helens Linkway Road which is a strong, permanent defensible boundary.

To assist in safeguarding the countryside from encroachment

The site is well related to the existing urban area and benefits from strong existing boundaries in all directions. Whilst a limited amount of encroachment into the countryside is inevitable if St. Helens is to meet its long-term housing needs through Green Belt release, developing this site will be such that any further encroachment into the countryside would be prevented.

The sensitive development of the site will not affect the purpose of safeguarding the countryside from encroachment in this location.

To preserve the setting and special character of historic towns

The sensitive development of the site would not impact on the character or setting of any Listed Buildings or Conservation Areas. St Helens is not a nationally recognised historic town and there are none within the vicinity of the site. Removal of the site from the Green Belt does not affect the purpose of preserving the setting and special character of a historic town.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The Council has acknowledged that the supply of deliverable brownfield sites is not sufficient and, consequently, Green Belt release is required to meet the Borough's housing needs over the plan period. As such, all sites in the Green Belt should be considered equally and neutrally when assessed against this purpose.

The release of the site from the Green Belt and allocation for housing development would not prevent the recycling of derelict land and other urban land because insufficient brownfield sites are available to meet the future housing needs of the Borough.

Furthermore, the fact that the former Pilkington Glass site is being developed relatively close by, indicates that derelict land, where available and suitable will be delivered in the borough. The site is well placed to deliver urban regeneration by making a positive contribution towards the Council's affordable housing needs, whilst contributing environmental and ecological benefits.

Summary

The site is not required to maintain the purposes of the Green Belt in this location and should therefore be released for housing through the new SHLP. Overall, the site does not make a contribution to the five purposes of the Green Belt, which has not only been demonstrated here, but has also been acknowledged by St.Helens Council through its own Green Belt Review and its decision to remove the site from the Green Belt in the emerging SHLP.

LOVELL
PARTNERSHIPS

A MORGAN SINDALL GROUP COMPANY



Green Belt compensation

Paragraph 138 of the NPPF states that Strategic policy-making authorities should “set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

Paragraph 141 of the NPPF states that “once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

Furthermore, the PPG (Paragraph: 002 Reference ID: 64-002-20190722) sets out examples of how the impact of removing land from the Green Belt may be offset including:

- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.

The Council's strategic compensatory improvement to offset the impact of removing land from the Green Belt is the implementation of the Bold Forest Park (BFP) Area Action Plan (AAP) (2017). The BFP AAP forms part of the St. Helens Development Plan and provides a framework for the development of the BFP area. BFP occupies an area of 1,800 hectares of Green Belt land in the southern-most part of St Helens Borough.

There are opportunities to provide ecological enhancements and to link woodland and green spaces on the site and within the land edged blue controlled by Lovell, to surrounding green infrastructure, including the Bold Forest Park which align with the examples detailed in the PPG. The site provides the opportunity to contribute to the objectives of the Bold Forest AAP and thus to the Council's strategy for Green Belt compensation. It is well located to provide strong connections to and to deliver extensions to the proposed strategic link routes, improving connectivity to the wider park, enhancing the landscape through additional tree planting and contributing to ecological enhancements.

Furthermore, the site and additional land edged blue provide a unique opportunity for managed public access and to provide landscape, visual amenity and biodiversity enhancements in accordance with Paragraph 141 of the NPPF.

Section 4.0 Masterplan

The masterplan for the site has been carefully designed to respect and complement the context and setting of the site, while being tailored to suit local housing requirements by delivering up to 150 affordable dwellings which will sit comfortably within an extensive mature landscaped setting.

In addition to much needed local housing, the development will deliver a multi-functional greenspace network which will enhance connectivity between the urban area and the rural fringes for the benefit of local communities, while also complementing the objectives of Bold Forest Park.



The 'Vision'

"To create a high-quality residential extension that complements existing settlement form, softening an abrupt urban edge and integrating green links to enhance physical and visual connectivity between the urban area and the rural fringe, while retaining a strong sense of place by capitalising on views to The Dream sculpture"

Site constraints and opportunities

The site has been assessed with regards to the constraints and opportunities that arise when considering a site for residential development. The constraints and opportunities plan has been produced to create a visual representation of this assessment work.

The site has been subject of a number of technical assessments. As a result, Lovell are entirely confident that the site can deliver the proposed development of up to 150 affordable dwellings along with associated infrastructure, open space and Green Belt compensation/ecological enhancements.

Figure 05
Opportunities and constraints plan

KEY:

- Site boundary
- Land to remain in Green Belt
- Existing trees/woodland
- Existing pedestrian route/PROWs
- Potential highway access
- Potential pedestrian/cycle links
- Residential development areas
- Active frontages
- View line
- Housing fronting towards site
- Housing backing/siding onto site
- Embankments
- Watercourse
- Green Belt enhancement land



Land at Chapel Lane, St Helens Development Statement

Section 4.0 Masterplan

Highways and access

Professional transport consultant, Eddisons, has been appointed to assess the site in relation to highways and access.

Existing vehicular access to the site is via Chapel Lane in the form of a gated access to the existing agricultural land. A pedestrian footway is provided along the eastern edge of Chapel Lane, adjacent to the proposed development site.

A primary vehicular access to the site would be taken from a new priority junction off Chapel Lane and a potential secondary access extending from the recent 'Forest Green' development off Walkers Lane.

The Chapel Lane access to the site can be achieved without the loss of mature and valued trees along Chapel Lane, aside from those which have been surveyed as requiring removal. The highway access location will seek to avoid root protection zones to protect retained trees.

The local highway network has capacity to accommodate the additional traffic generation that will arise from the proposed development, however, any planning application will ensure that off-site highway improvements will be delivered if deemed necessary to mitigate any severe impacts on the transport network.

Pedestrian footways will be provided throughout the proposed development, offering comprehensive links around the site. There is potential to provide pedestrian and cycle access to the site from Chapel Lane, 'Forest Green' and Shakespeare Road ensuring that the development improves connectivity and permeability between the urban area and the rural fringes. The enhanced pedestrian movement network will also increase accessibility to the Bold Forest Park network.



Chapel Lane site frontage



Existing field gate from Shakespeare Road



Potential highway access from 'Forest Green' development

LOVELL
PARTNERSHIPS

A MORGAN SINDALL GROUP COMPANY

Ecology and trees

The site does not contain any protected habitats and any impacts from the development on protected species can be fully mitigated through compensation and enhancement measures which can be delivered both on the site and on the adjacent land edged blue. The proposed development would not have any significant negative impacts on the Pendlebury Brook Local Wildlife Site which runs close to the eastern and southern boundaries of the site.

A Biodiversity Enhancement Measures Report has been prepared by Amenity Tree Care Ltd which provides a scheme for biodiversity enhancement measures across the site (including the land edged blue). There are opportunities to provide ecological enhancements including those associated with the existing woodland, Pendlebury Brook and the existing pond and surrounding trees close to the proposed site entrance. These include the creation of a lowland meadow with high biodiversity value, pond enhancements and management of the woodland area to eradicate non-native vascular species and creating conditions favourable for the development of native plants such as Bluebell. Additional tree planting can also be provided on the adjacent land edged blue which would accord with the objectives of the Bold Forest Park Area Action Plan.

An Arboricultural Impact Assessment (AIA) has been undertaken which identifies the trees of value on the site. These will be retained as part of the landscape-led masterplan approach. The retention of these trees, including the woodland to the south will contribute to public visual amenity and will assist in screening views of the build development within the site. A Woodland Management Plan would be implemented to address any threats to plant health and prescribe an appropriate planting and management regime.



Land to the south of the site available for Green Belt compensation and to deliver Biodiversity Net Gain



Existing trees along site frontage to Chapel Lane

Land at Chapel Lane, St Helens Development Statement

Section 4.0 Masterplan



Flood risk and drainage

The majority of the site is located in Flood Zone 1, with only a small proportion of the adjacent land edged blue, immediately adjacent to Pendlebury Brook, being located within Flood Zones 2 and 3. This area is not proposed to be developed for housing.

Surface water drainage from the development will be adequately managed via Sustainable Urban Drainage Systems (SUDS) and the potential to provide compensation storage within the site, to alleviate up-stream flooding and drainage issues will be fully investigated. An area of lower land at the eastern corner of the site appears suitable for use as a surface water attenuation area.

Archaeology and heritage

The Land at Chapel Lane has an industrial past and the former sites of Brook Cottage and Brook Works (non-designated heritage assets) are situated within the wooded area to the south of the site. There is an opportunity to provide public access to these assets with informative signage for residents and visitors.

An archaeological appraisal has confirmed that there are no Scheduled Monuments, Listed Buildings, Registered Battlefields or Registered Parks and Gardens within the site and the potential for significant prehistoric, Roman or medieval remains to be found within the site boundary is low.

Within a 1km radius of the site there is one Scheduled Monument, Micklehead Green moated site which is located approximately 75 metres to the north of the site between Walkers Lane and St Michaels Road. The closest Listed Building to the site is Grade II Listed Woods House Farmhouse located on Bell Lane, approximately 350 metres to the south of the site. The proposed development will not impact the Scheduled Monument or the Listed Building as no upstanding remains are extant for the monument and there is no inter-visibility between the site and either of these Heritage Assets.

The site falls within an Ancient Schedule Monument (ASM) buffer zone however due to the distance, the built development and lack of intervisibility between the site and the ASM, it is not considered to

be an issue. This was confirmed in the Council's own assessment of the site in Stage 2B of the Green Belt Review.

There are no identified archaeological constraints that would preclude the development of the site.

Topography and ground conditions

The site is relatively flat in terms of site levels and there are no topographical constraints to development.

A Phase I and Phase II Geo-Environmental Site Assessment has confirmed that the site can be developed without requirements for any contamination mitigation measures.

The site is located within a Coal Authority Development High Risk Area, but a coal mining risk assessment has confirmed that there are no known coal mine entries within or within 20 metres of the site boundary and the site is not within a surface area that could be affected by past underground mining.

Utilities and infrastructure

The site is located at the edge of Sutton Manor and adjacent to existing properties and therefore it is anticipated that appropriate services including electricity and broadband will be available. There are no identified utilities constraints to prevent the development of this site.

Air quality and noise

The site is not located within any of the four Air Quality Management Areas (AQMA) within the St. Helens Borough. The site will be assessed for potential air quality impacts during the development of the residential proposals however there are no obvious air quality constraints that would preclude the development of the site.

The current noise environment would not preclude residential development coming forward in this location.

Ground conditions and coal mining

A Phase I and Phase II Geo-Environmental Site Assessment has been undertaken by E3P to determine potential contaminated land liabilities and other geotechnical considerations that will be relevant to the proposed development.

There are no active or historic landfills located on or within the immediate vicinity of the site and the site does not present a risk to human health. It may be developed without requirements for any contamination mitigation measures.

As the site is located within a Coal Authority Development High Risk Area, a detailed coal mining risk assessment has been completed. Sixteen coal seams have been identified underneath the site at substantial depths, however there are no known coal mine entries within 20 metres of the site boundary and the site is not within a surface area that could be affected by past underground mining.

On this basis, there are no identified ground conditions constraints that would prevent the development of the site. If deemed necessary, detailed investigations into the coal seams present underneath the site will be undertaken as part of any future planning application and appropriate engineering practices adopted during construction to avoid adverse impacts on safety or human health.



Existing pond within the site

Landscape and visual

The landscape-led design approach will ensure that the proposed development would not harm landscape character, rather it would provide an opportunity to restore and enhance the character of the urban edge by softening the interface with the surrounding woodland and integrating green links into the site. Subject to appropriate design, layout and massing at the planning application stage, there are no significant landscape or visual constraints that would preclude the development of the site.

The retention of existing valued landscape features will ensure that impacts upon landscape character are minimised. These features will also be positively integrated into the development to create a characterful development with strong sense of place, where people will want to live.

Considered building orientation and areas of active frontages will ensure that the development has an attractive appearance in key views and will also provide security through natural surveillance over open spaces throughout the site.

The masterplan will be designed to create view lines through the site to green spaces to draw people towards the open space network, thereby encouraging its use. A long view line to The Dream sculpture in former Sutton Manor colliery site will also be framed by development to reinforce a strong sense of place and local identity.

Surrounding development

The Illustrative Masterplan takes into account the site's relationship with surrounding development. Most relevant considerations are:

- The relationship of the proposed development with existing residential properties on Wordsworth Avenue which front onto the north-eastern site boundary.
- The relationship of the proposed development with existing dwellings at the north-western site boundary, which include bungalows.

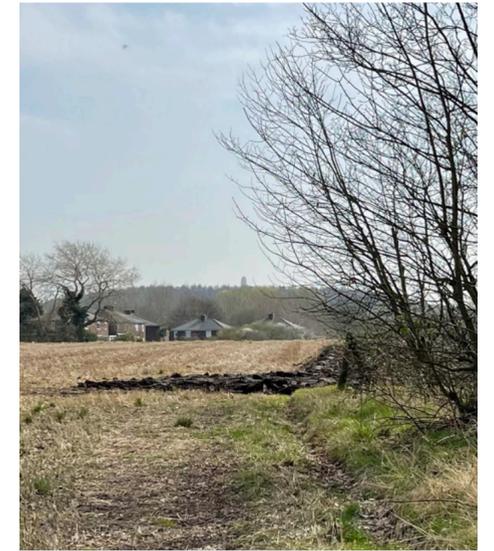
- The relationship of the proposed development with the recently constructed 'Forest Green' development of Walkers Lane at the centre of the northern boundary. There is potential to complement this development in order to create a unified character to this part of Sutton Manor.

Greenspace and connections

The site sits within a mature landscape setting and has potential to form part of a wider extensive network of greenspaces, including the Bold Forest Park. There is currently no public access into the site. Development presents an opportunity to create a high quality residential extension set within an attractive on-site greenspace network which can facilitate access to, and generally support, the wider functional greenspace network.

Development of the site has potential to:

- Open up the northern part of the existing woodland to the south of the site to make it accessible to the public, with attractive woodland routes, areas for play and recreation, and informative signage and wayfinding which can promote access to the wider Bold Forest Park. The southern parts of the woodland would be designed primarily to provide new wildlife and ecological habitats along the interface with Pendlebury Brook;
- Provide green links through the site which will be visible from the existing urban edge to encourage access and use of the greenspace network around the site and beyond it;
- As part of a considered Green Belt compensation strategy, provide new woodland planting and ecologically-rich grassland areas on an adjacent parcel of land between Chapel Lane and School Lane which will complement the objectives of Bold Forest Park. Informal public access through this field would also reduce the amount of roadside walking required when travelling south from the site.



Long view through the site to 'The Dream'



Housing on Wordsworth Avenue facing the site

Land at Chapel Lane, St Helens Development Statement

Section 4.0 Masterplan

Design principles

The constraints and opportunities analysis has resulted in the following key design principles which the Illustrative Masterplan seeks to embrace:

- Retention of valued landscape features and integration of these features into the layout to create an attractive and characterful development which is permeated by a multi-functional green space network;
- Create new welcoming, accessible, and greened public routes from Sutton Manor through the site to connect to the wider urban fringe landscape and Bold Forest Park. These routes will also facilitate convenient access to local facilities for new residents of the development;
- Retain a view line to 'The Dream' within Bold Forest Park to the east to reinforce sense of local identity and place;
- Create secure development blocks which actively overlook open spaces and provide attractive street scenes when viewed from the immediate local surroundings;
- Utilise the existing woodland to provide connections, spaces for recreation and play, and areas of biodiversity enhancement;
- Provide enhancements to the Pendlebury Brook corridor for the benefit of ecology/biodiversity;
- Use additional field to the south west of the site for Green Belt compensation and ecological enhancements which would compliment the wider Bold Forest Park context.



LOVELL
PARTNERSHIPS

A MORGAN SINDALL GROUP COMPANY

Illustrative Masterplan

The Illustrative Masterplan has been produced to show how the site could deliver a high-quality scheme that fulfils the Vision and embraces the design principles, providing much needed affordable dwellings to positively contribute to the Borough's housing needs.

Figure 06

Illustrative Masterplan

KEY:

-  Land proposed to be removed from the Green Belt and Housing Allocation
-  Land to be retained in the Green Belt (including retained and proposed woodland, Green Belt Compensation and Biodiversity Enhancement Land)
-  Existing vegetation
-  Existing watercourse
-  Proposed pedestrian route
-  Proposed open space
-  Proposed indicative tree planting
-  Indicative buildings
-  Proposed primary road
-  Proposed secondary / tertiary road
-  Proposed SuDS
-  Proposed play area



Section 5.0 Suitability and deliverability of the site

The site represents a sustainable solution which will make a positive contribution towards St Helen’s housing needs in accordance with the NPPF. The site will perform a positive economic, social and environmental role and meet the definition of sustainable development.

Paragraph 8 of the NPPF sets out that sustainable development has three overarching objectives: economic, social and environmental.

The proposed development would accord with each of these objectives, contributing to building a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities and continuing to protect and enhance the natural, built and historic environment.

Sustainable transport is another important theme within the NPPF (Paragraphs 102-111); and has a critical role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives.

Chapter 5 of the NPPF sets out how local authorities should boost significantly the supply of housing in order to deliver sufficient supply of homes.

Location and accessibility

The site is sustainably located in proximity to a range of local facilities and services. A distance of 1km is widely regarded as an acceptable walking distance to local services with 2km being considered acceptable for commuting. Within 1km of the centre of the site there are a number of local level services and facilities, which are very conveniently located for access from the site including employment and leisure units at Lea Green Business Park to the north of Walkers Lane, four convenience stores (including one at a petrol filling station); two hot food takeaways; allotments (located to the west of Walkers Lane); and access to a range of ‘green spaces’ including the Sutton Manor Woodland (the former Sutton Colliery site) to the east of the site.

There is a further range of services and facilities which are located just outside the 1km catchment of the site. These include the Four Acre Shopping Centre (incorporating a large convenience store, pharmacy and other retail units), Chester Lane Library, the Beefeater Mickle Head Green public house and restaurant and the Premier Inn St Helens South hotel.

The site is well served by the existing public transport network with bus stops located in direct proximity to the site on Walkers Lane to the north and on Forest Road to the north-east, which are approximately 150 metres and 190 metres from the site respectively. There are a number of services which utilise these stops including:

- Route 30 Sutton Manor – St Helens – Chain Lane. This route operates three services per hour (two per hour in the evenings and Sundays);

- Route 32 Sutton Manor – St Helens – Clinkham Wood: This route operates an hourly service (evenings and Sundays only); and,
- Route 920 Haydock Industrial Estate – St Helens Bus Station: This route operates two services per day.

The nearest railway station is Lea Green which is located approximately 2km from the site. The station features a large car park with space for 190 vehicles along with cycle parking. The station also enables interchange with both buses and taxis. Services from Lea Green provide access to Liverpool and Manchester with journey times of approximately 30 minutes and 40 minutes respectively.

Based on a standard 5km cycle catchment, a range of employment, retail and leisure opportunities are available. Walkers Lane, Chapel Lane and Forest Lane in the vicinity of the site are highlighted in St Helens Council’s cycle maps as suggested cycle routes. These provide connections to other cycle routes in the area including Lea Green Station via on-road, signed routes and other off-road routes including access to Lea Green Business Park to the north and Sutton Manor Woodland to the east.

The A570 St Helens Linkway offers good vehicular access to the site and links to the strategic road network (M62) to the south via Chapel Lane. Wide pavements with dipped kerbs on Walkers Lane and Chapel Lane provide safe pedestrian access to the site.

Overall, the site is sustainably located and offers residents the opportunities to use sustainable modes of transport to access local services, facilities and employment opportunities.

Figure 07
Sustainability plan

KEY:

- Site Boundary
- Land to remain in Green Belt (proposed for Green Belt compensation and ecological enhancement)
- 0 - 1km Walking Catchment
- 1 - 2km Walking Catchment

Local Facilities

- School
- Bus Stop
- Train Station
- Public House
- Petrol Station
- Pharmacy
- Convenience Store
- Health Centre
- Library



Land at Chapel Lane, St Helens Development Statement

Section 5.0 Suitability and deliverability of the site

LOVELL
PARTNERSHIPS

A MORGAN SINDALL GROUP COMPANY

Community facilities

A number of schools are located within 2 km of the site, including: Sutton Community Manor Primary School (0.3km), St Theresa's Primary School (1km), and Rainhill High School (1.1km). There are a number of other primary and secondary schools within the local areas of Rainhill to the west and Sutton to the north. Fourways Childrens Centre and Day Care Nursery is located approximately 1km to the north east of the site. Little Angels Pre-School is located approximately 1.7km from the site.

The nearest pharmacy is located approximately 1km to the north east of the site. The nearest doctors' surgery is the Four Acre Health Centre in Clock Face (1.1km). The nearest hospitals are Whiston Hospital to the east and St Helens Hospital to the north which are located 3.3km and 3.1km from the site respectively. Bold Veterinary Clinic is located approximately 1.7km from the site in Sutton Leach.

A number of community and recreational facilities are available in proximity to the site that could be utilised by future residents including the King George V playing fields, located approximately 0.6km to the east, which include a children's playground and a number of sports pitches. The Shining Lights Community Centre, located approximately 0.2km to the east of the site offers indoor sports, arts and crafts and holiday club for children. Sutton Manor Woodland, located approximately 1km to the east of the site offers an extensive network of trails suitable for walking and cycling and includes a piece of public art known as the 'Dream' sculpture.



Shining Lights Community Centre



Sutton Community Manor Primary School



King George V Playing Fields



£21m Construction Cost over 3 years
Gross Value Added (GVA) of **£26.1m**



349 gross direct FTEs during the construction phase, equating to circa **120** FTEs per year and **10** gross permanent FTEs during the operational phase
A further **256** gross indirect and induced FTEs created during the construction phase and a further **8** gross indirect and induced permanent FTEs during the operational phase



Council tax receipts of circa **£298,089** per annum
Total expenditure by residents of over **£4.6m** per annum

Economic objective

The development of the site will contribute to building a strong and competitive economy and SHMBC has committed to pursuing economic growth through the SHLP. A development of 150 affordable homes will lead to significant job creation through the construction period, both directly at the site, and indirectly through spinoff jobs created in the local construction industry and additional spending on local services and facilities.

Housing delivery will also provide fiscal benefits for the Council in terms of additional monies for the Council through Council Tax and New Homes Bonus payments, and will lead to increased expenditure in the local economy, directly through the investment during the construction period, and later through first occupancy expenditure and other ongoing expenditure benefits to the Borough's economy, from the new residents of 150 new dwellings.

Housing supply is important in the local labour market as it promotes local economic competitiveness. A shortage of homes or lack of affordability can create a barrier to people accessing employment opportunities or result in the requirement to commute which results in adverse transport and environmental impacts.



Social objective

The social objective of sustainable development is to support a strong and healthy community. The site is proposed to be removed from the Green Belt and safeguarded for housing and it is considered that the site can provide a development of 150 homes which will provide:

- A unique opportunity to deliver a 100% affordable development within one of the country's most deprived Boroughs and wards in which there is worsening affordability and historic undelivery of affordable homes;
- A range of house types and sizes will be provided to meet the needs of St Helens and the surrounding area;
- A network of multifunctional and attractive green space. The existing woodland to the south of the site will be opened up to the public to create a valuable and attractive natural asset for the local community; and,
- Public access to the non designated heritage sites (Brooks Cottage and Brooks Works) will be provided together with information for residents and visitors. The form and context of this information can be agreed with the local community.

Land at Chapel Lane, St Helens Development Statement

Section 5.0 Suitability and deliverability of the site

Lovell and its role in the community

Lovell is committed to providing employment and skills opportunities across a range of trades and support services, promoting careers in construction, recruiting apprentices and working with the supply chain to help develop their businesses. Lovell seeks to address identified social needs and empower communities to drive regeneration by engaging with local schools, supporting local charities or groups and providing training opportunities for local people. To ensure a positive experience, Lovell carries out early engagement with neighbours and maintain constant communication throughout each project.

Lovell has a dedicated Social Value team to deliver on social value commitments and ensure that each development contributes to the creation of thriving and diverse neighbourhoods that are tailored to local needs. The Social Value team, who already have established relationships with education, employment and training providers, are committed to strategically plan, identify and engage with stakeholders to implement initiatives. This will have a major impact on the drive and ability to deliver beyond basic contract terms and secure wider benefits for communities.

Environmental objective

A key aspect of the environmental objective of sustainable development is protecting and enhancing the natural, built and historic environment, including making effective use of land and helping to improve biodiversity. In this context the proposed development will:

- Nestle sensitively within the surrounding landscape and green space network;
- Retain valued trees within the site and open up and enhance the existing adjacent woodland within the site edged blue into a publicly accessible, natural, local asset;
- Include a Woodland Management Plan to manage biodiversity enhancements by eradicating non native vascular plants and creating conditions favourable for the development of native plants;
- Facilitate ecological enhancements within the green space network within and surrounding the site, including pond enhancements and lowland meadow creation;
- Provide compensatory Green Belt improvements relating to public access and ecological, visual and landscape improvements on additional land within the site edged blue adjacent to the site; and,
- Contribute to meeting the objectives of the Bold Forest Park Area Action Plan, including enhanced access to leisure opportunities.

Deliverability

The site is a suitable area for housing as there are no physical, technical or environmental constraints preventing its development early in the plan period. The NPPF requires Local Planning Authorities to maintain delivery of housing land to meet their housing targets. To be considered deliverable the site should:

Be Available:

A site is considered available when there is confidence that there are no legal or ownership problems;

Be Suitable:

A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and,

Be Achievable:

A site is considered achievable for development where there is a reasonable prospect achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

LOVELL
PARTNERSHIPS

A MORGAN SINDALL GROUP COMPANY



Available

The site will be brought forward through a Joint Venture between Lovell and Together Housing Group who have secured an agreement with the landowner of the site. The site is therefore in control of a major reputable housing developer and Registered Provider and can be developed to provide up to 150 affordable dwellings to meet the critical affordable needs of the Borough.

If the site is to be successfully allocated and removed from the Green Belt, Lovell will seek to develop the site immediately, subject to planning, and in doing so would make a positive contribution towards the Borough's 5-year housing land supply which the Council's own evidence demonstrates cannot be provided upon adoption.

Lovell have a strong track record for housing delivery and quick build out rate (2 per week based on their standard site set up and staff).

The site is therefore considered available in the context of the NPPF.



Suitable

The site is suitable for residential development for the following reasons:

- It can be developed immediately following its allocation and removal from the Green Belt;
- It will form a natural extension to the established area of Sutton;
- There are no identified environmental constraints which would prevent the development of the site for 150 dwellings;
- Development could utilise the existing infrastructure of the surrounding area and there are no drainage or utilities constraints which could prevent the site coming forward;
- A satisfactory access from Chapel Lane can be accommodated;
- The site is situated within a local highway network which has the capacity to accommodate these additional dwellings;
- The development will deliver new open space for use by new and existing residents; and,
- The site is sustainably located and close to existing bus stops and local services and facilities.

The site is therefore considered suitable in the context of the NPPF.



Achievable

The site has been fully assessed in terms of its potential constraints which illustrates that the delivery of the site is achievable and deliverable and a team of technical consultants has been appointed to support the delivery of this site moving forward. Where technical constraints are identified, appropriate mitigation and investment in the site will be provided to ensure delivery. A viability assessment of the site has been undertaken including land values, market demand and potential sales within the Borough.

On this basis, the site is economically viable and is therefore achievable in the context of the NPPF.

Summary

The site offers a sustainable location on the edge of the existing built up urban area and has access to good public transport facilities. Other vital community facilities including shops, schools and parks are also within walking distance. It is a deliverable site that is available, achievable and viable, and its development with up to 150 homes would boost the supply of housing in the Borough.

Chapter 15 of the NPPF highlights how the planning system should contribute to and enhance the natural and local environment. Land at Chapel Lane does not have high environmental or amenity value and its development for housing would not adversely impact upon valued and important landscapes or biodiversity and geodiversity. Furthermore, there are opportunities to provide ecological enhancements and to link woodland and green spaces on the site to surrounding green infrastructure, including the Bold Forest Park.

Section 6.0 Conclusions

This Development Statement sets out the case for the removal of Land at Chapel Lane from the Green Belt and its allocation for residential development through the new St Helens Local Plan. The site presents a unique opportunity to deliver a 100% affordable development of approximately 150 new dwellings of the appropriate type, size and tenure to make a positive contribution towards the future housing and affordable housing needs of St Helens without undermining the purposes of the Green Belt or adversely impacting upon the environment.

Development of the site also presents a unique opportunity to provide a network of multifunctional green spaces, Green Belt compensation, ecological enhancements and linkages through to the Bold Forest Park (helping to meet the objectives of the Bold Forest Park Area Action Plan).

This Development Statement demonstrates that Land at Chapel Lane:

- Can support the objectives of the Bold Forest Park Area Action Plan by improving connectivity to the wider park, enhancing the landscape through additional tree planting, contributing to ecological enhancements, biodiversity and protecting heritage assets;
- Represents a logical and natural extension to the existing urban area that has strong physical boundaries, is well-contained and does not contribute significantly to the five purposes of the Green Belt;
- Is sustainably located on the edge of the Sutton Manor urban area and is within proximity to a range of local-level services and facilities including high-quality public transport links;
- Is entirely suitable, achievable and deliverable for a residential development in accordance with the NPPF; and will deliver 100% affordable housing to meet acute local needs within one of the country's most deprived wards;
- Can accommodate high quality residential development that nestles within the landscape and wider green space network;
- Will provide high levels of connectivity and permeability within the site and the surrounding area. The development will also retain existing woodland and open it up for public access, as well as providing additional land within the site edged blue to deliver ecological enhancements and Green Belt compensation;
- Will generate significant material social and economic benefits, by stimulating economic investment and job creation and providing housing choice; and,
- Has no identified technical or environmental constraints that will prevent its delivery early in the plan period.



Summary

In summary, the site is entirely suitable, achievable and deliverable for residential development subject to its removal from the Green Belt and allocation for housing. This has already been demonstrated through the site's inclusion as a proposed housing allocation in the Preferred Options version of the Local Plan and as a proposed safeguarded site for housing in the Submission Draft Local Plan.

Lovell is committed to working collaboratively with the Council and key stakeholders to bring forward a high-quality 100% affordable scheme that will enhance the natural environment, maintain the core functions of the Green Belt and contribute to meeting the Borough's future housing needs, including its critical need for new affordable housing, in a sensitive and sustainable manner.

The site forms a natural extension to the urban area, has sustainable access to facilities, can be safely accessed via the existing highways network and will have an acceptable impact on the environment. It offers a unique opportunity to provide substantial ecological enhancements including new woodland planting and ecologically-rich grassland areas within adjacent land under the control of Lovell which will complement the objectives of Bold Forest Park Area Action Plan and contribute towards Green Belt compensation.

Lovell therefore seeks support for an alteration to the Green Belt boundary and the allocation of the site for housing through the new St Helens Local Plan.

LOVELL

PARTNERSHIPS

A **MORGAN SINDALL GROUP** COMPANY

For more information please contact:

Lovell Partnerships Limited (Part of the Morgan Sindall Group)

St Johns House

Barrington Road

Altrincham

Cheshire

WA14 1JY