

Warrington Local Plan Examination

Matter 7e – Site Allocation – Winwick

ON BEHALF OF BELLWAY HOMES (2297)

August 2022

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1. Introduction

- 1.1 This Hearing Statement is submitted on behalf of the Manchester division of Bellway Homes Limited (“Bellway”) (Respondent ID: 2297) in relation to the Examination of the Warrington Local Plan (“the Plan”) [SP1].
- 1.2 It has been prepared by Nexus Planning in relation to Matter 7e (Site Allocation – Winwick), which explores whether the site allocation at Winwick (Policy OS6) is justified, effective and consistent with national policy.
- 1.3 Bellway controls the land to the north of Winwick (“the site”), which is proposed to be allocated by Policy OS6 for a minimum of 130 homes.
- 1.4 In summary, our responses to the Inspectors’ Matters, Issues and Questions (“MIQs”) conclude that:
 - Question 1 – the background to the site allocation is **justified**;
 - Question 2 – the altering of Green Belt boundaries in this location is **justified**;
 - Question 3 – the development of the site will not harm the overall function and integrity of the Green Belt;
 - Question 4 – there are exceptional circumstances to alter Green Belt boundaries to accommodate the site;
 - Question 5 – whilst the scale of development is **justified**, the site can comfortably accommodate 160 homes;
 - Question 6 – parts 2 and 4 of Policy OS6 are **not justified or effective**;
 - Question 7 – an amendment to the supporting text is required to ensure the policy is **effective**;
 - Question 8 – the approach to Green Belt compensatory improvements requires further refinement;
 - Question 9 – there are no potential adverse effects which cannot be mitigated;
 - Question 10 – safe access to the site can be secured;
 - Question 11 – the development proposed is viable and deliverable within the period envisaged;
 - Question 12 – Bellway has secured the site under an option agreement with the landowner;
 - Question 13 – Bellway will complete the development by Summer 2028;
 - Question 14 – Main Modifications are proposed to parts 2, 4 and 13 of the policy and supporting text.
- 1.5 To aid the Inspectors, we have cross-referenced our answers to the ‘tests of soundness’ in paragraph 35 of the National Planning Policy Framework, July 2021 (“NPPF”). Where necessary, we have suggested modifications to make the Plan ‘sound’.
- 1.6 We look forward to discussing our Statement and representations with the Inspectors at the hearing session on Tuesday 27 September 2022.

2. Response to Questions

Question 1

What is the background to the site allocation and how was it identified?

- 2.1 We understand the site was originally considered as part of a much wider parcel of land (ref. WI7) in the Green Belt Assessment Final Report (October 2016) [GB5].
- 2.2 The site itself was then submitted as part of the original ‘Call for Sites’ exercise undertaken between October to December 2016 (ref. R18/040). The Site Assessment Proformas (2019) [SAP2] and the Sustainability Appraisal (March 2019) [SA1] underpin the site’s draft allocation (ref. Policy OS9) in the Proposed Submission Version Local Plan (March 2019) [PLVP1].
- 2.3 The site was subsequently reconsidered by the Green Belt Site Selection Implications of Green Belt Release Report (August 2021) [GB3], the Green Belt Site Assessment Collated Report (September 2021) [GB4] and the updated Sustainability Appraisal (August 2021) [SP3]. As such, it was carried forward into Policy OS6 of the Plan [SP1].
- 2.4 This evidence base was also supplemented by Bellway’s previous representations, including a Delivery Statement (June 2019) (Appendix 1 to our Regulation 19 representations, dated 15 November 2021).

Question 2

What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?

- 2.5 The original Green Belt Assessment Final Report (October 2016) [GB5] concluded the wider parcel of land (ref. WI7) only makes a ‘moderate contribution’ to the Green Belt.
- 2.6 More specifically, in examining the site itself (ref. R18/040), the Green Belt Site Assessment Collated Report (September 2021) [GB4] concluded it only makes a ‘moderate contribution’ to the Green Belt. Likewise, the Green Belt Site Selection Implications of Green Belt Release Report (August 2021) [GB3] concluded “*The site currently makes a moderate contribution to Green Belt purposes*”.
- 2.7 Furthermore, the Site Assessment Proformas (2019) [SAP2] makes a number of additional conclusions based on suitability, availability and achievability of the site (ref. R18/040).
- 2.8 To assist the Inspectors therefore, we have undertaken our own assessment of the existing contribution that the site makes to the five purposes of the Green Belt (paragraph 138 of the NPPF) in Table 2.1. On this basis, the site offers excellent potential to alter Green Belt boundaries in this location to accommodate the incremental housing growth to be directed to Winwick by the Plan’s [SP1] spatial strategy.

Purpose	Assessment
Purpose 1: to check the unrestricted sprawl of large built-up areas	No contribution: The site is not adjacent to the large built-up area of Warrington and therefore does not contribute to this purpose.
Purpose 2: to prevent neighbouring towns merging into one another	Weak contribution: The site falls within an extensive gap between the settlements of Winwick and Newton-le-Willows (in St Helens) to the north west, and therefore makes a weak contribution to preventing towns from merging.

Purpose	Assessment
Purpose 3: to assist in safeguarding the countryside from encroachment	Moderate contribution: The site is a flat greenfield site, in agricultural use within the open countryside. However, its openness is limited by a large electricity pylon on-site with overhead cables (running east to west). Generally, the site has strong robust existing boundaries. To the east (Waterworks Lane), south (Spires Gardens and the waterworks) and west (Golborne Road) are existing permanent physical features. The northern boundary is less durable (comprising a field boundary demarcated by a post and rail fence and low vegetation), but it has potential to be strengthened. Overall, the site makes a moderate contribution to this purpose.
Purpose 4: to preserve the setting and special character of historic towns	No contribution: The site is not adjacent to a historic town and does not cross an important viewpoint of the Grade I listed Parish Church.
Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Weak contribution: Although the site is greenfield, there is a small section of potentially contaminated land in the north eastern corner of the site (owing to a historic sand pit which was infilled in the mid-20 th Century).
Overall Assessment	Moderate contribution

Table 2.1: Nexus assessment of the existing site’s contribution in relation to the five Green Belt purposes

Question 3

What would be the effect of developing the site on the purposes of the Green Belt?

2.9 The Green Belt Site Selection Implications of Green Belt Release Report (August 2021) [GB3] concluded:

“...Whilst development of the site would entail a small incursion into undeveloped countryside, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Winwick. A new recognisable and permanent Green Belt boundary would be created by strengthening existing boundaries.”

2.10 Again, to assist the Inspectors, we have undertaken our own assessment of the effect that developing the site would have against the five Green Belt purposes in Table 2.2:

Purpose	Assessment
Purpose 1: to check the unrestricted sprawl of large built-up areas	No contribution: Development of the site would not represent unrestricted sprawl as the site is not connected to the large built-up area of Warrington.
Purpose 2: to prevent neighbouring towns merging into one another	Weak contribution: Development of the site would slightly reduce the actual gap (but not the perceived gap) between Winwick and Newton-le-Willows. However, due to the size of the site and the gap, this would represent a small decrease in the separation of the towns and it would not result in neighbouring towns merging. It would reduce the actual gap, but not the perceived gap.
Purpose 3: to assist in safeguarding the countryside from encroachment	Weak contribution: Development of the site would only entail a small incursion into undeveloped countryside, due to its relatively small-scale nature. However, development would not encroach further into the countryside beyond the existing durable (eastern, southern and western) boundaries. In addition, the existing northern boundary will be supplemented with new landscaping and tree planting to offer strong screening and a transition from the settlement to the open countryside ¹ , and prevent further encroachment.
Purpose 4: to preserve the setting and special character of historic towns	No contribution: The site is not adjacent to a historic town and development would not cross an important viewpoint of the Grade I listed Parish Church.

¹ As illustrated by the green and yellow buffer along the northern site boundary on Bellway’s Coloured Sketch Layout (November 2019) (Appendix 2 to our Regulation 19 representations, dated 15 November 2021)

Purpose	Assessment
Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Weak contribution: Development of the site would recycle a small section of potentially contaminated land in the north eastern corner of the site. In addition, the relatively small-scale nature of the site would not undermine the regeneration of brownfield sites the capacity of which has been fully maximised.
Overall Assessment	Weak contribution

Table 2.2: Nexus assessment of the effect of developing the site against the five Green Belt purposes

2.11 On the same basis, the site offers excellent potential to alter Green Belt boundaries in this location to accommodate the incremental housing growth to be directed to Winwick by the Plan’s [SP1] spatial strategy.

Question 4

Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?

- 2.12 Yes, in our view, exceptional circumstances have been demonstrated to alter Green Belt boundaries at Bellway’s site to the north of Winwick.
- 2.13 As explained at paragraph 3.4.10 of the Plan [SP1], the exceptional circumstances for Green Belt release in the outlying settlements are to increase housing choice and to support the vitality and viability of local services. Furthermore, paragraph 3.3.14 recognises that incremental development at these settlements will not place unacceptable pressure on local infrastructure, and will ensure that the character of the settlement is maintained
- 2.14 With relevance to housing choice, we note that historically, housing growth has been extremely constrained in Winwick (owing to the extent of existing Green Belt). For example, Table 18 of the Local Housing Needs Assessment (August 2021) [H2] reveals that over the period 2010-2020, just 31 homes were built in the whole of ‘North West Warrington’ (which comprises Winwick, Burtonwood and Collins Green). Despite this, Table 38 reveals that over a similar period (2011-2019), the population in North West Warrington actually declined by 0.2%, which suggests that household sizes have reduced and housing choice has worsened.
- 2.15 Table 56 of H2 estimates that the net need for social/affordable rented housing in North West Warrington is 15 homes per annum, while Table 62 estimates the gross need for affordable home ownership is 6 homes. By comparison, and as we explore in response to Question 5, the land to the north of Winwick could comfortably accommodate 160 homes; 30% (48 dwellings) of which could be delivered as affordable, which in principle is the equivalent of 2.3 years’ of combined needs.
- 2.16 In addition, paragraph 9.64 of H2 identifies there is a need in North West Warrington for high-quality affordable family-sized homes. There is also an argument for increasing the number of smaller dwellings, which may be attractive to newly forming households and facilitate ‘right-sizing’ for older residents given the high relative proportion of homes that ‘under-occupied’.
- 2.17 However, without the release of the site from the Green Belt, which could deliver a range of house types (as illustrated by Bellway’s Coloured Sketch Layout (November 2019), housing choice will be even more limited in Winwick over the plan period to 2038.
- 2.18 In terms of local services, we understand that 12 of the 31 homes completed in the last 10 years included the redevelopment of the former Hermit Inn public house (ref. 2012/20808) on a previously developed site in the Green Belt on Golborne Road (approximately 500m north of the site). Despite the objections made by local residents (requesting the pub to be restored as a community asset), unfortunately this valued local facility and

Locally Listed Building was ultimately lost under the pressure of housing development, in part due to the lack of alternative and available, allocated sites at Winwick.

- 2.19 Without the release of Green Belt land to the north of Winwick, which is a well located sustainable greenfield site on the edge of the existing settlement, the existing settlement will remain heavily constrained over the plan period to 2038, because the site characteristics mean that these needs cannot be met elsewhere.
- 2.20 Conversely, the site actually has the ability to sustain the remaining local valued services within the village, including those identified by the Settlement Profiles - Outlying Settlements (July 2017) [O6], such as The Swan public house, Winwick Leisure Centre and the local convenience store on Myddleton Lane.
- 2.21 In summary, Bellway's representations demonstrate that the land to the north of Winwick is a sustainable site which is available, suitable and achievable to accommodate new homes and there are no technical constraints to its delivery. The allocation and subsequent development of the site will provide much needed new homes of a mix of tenures, types and sizes to meet local needs, as well as Warrington's overall needs, and it will deliver a range of social, economic and environmental benefits. As such, its development fully supports the spatial strategy.

Question 5

What is the basis for the scale of development proposed and is this justified? Could this be readily accommodated, given the sensitive location adjacent to both a registered battlefield, and a service reservoir?

- 2.22 In our view, the proposed allocation of the site for a minimum of 130 homes is **justified**, particularly in the context of the Plan's spatial strategy directing incremental growth to the outlying settlements.
- 2.23 Whilst Bellway's Coloured Sketch Layout (November 2019) illustrates the site could comfortably accommodate 160 new homes, Bellway is pleased that the policy is expressed as a 'minimum' and would not preclude a higher scale of development coming forward on the site, subject to complying with the relevant criteria of the policy and the Plan as a whole. The higher quantum of development proposed by Bellway on the site has been arrived at by the plotting of Bellway's specific house types (as informed by evidence of need and market research regarding the type of units which are likely to sell well within this particular part of Warrington), whilst allowing for relevant constraints, including the Registered Battlefield and the service reservoir.

Registered Battlefield

- 2.24 Appendix 2 of Bellway's Delivery Statement (June 2019) (Appendix 1 to our Regulation 19 representations, dated 15 November 2021), set out the heritage considerations of the site (as informed by a Preliminary Feasibility Study undertaken by Bellway's heritage consultant, Heritage Archaeology).
- 2.25 This found that the site makes only a slight positive contribution to the setting of the Registered Battlefield, being only a small element providing context to the larger designation. The contribution made by the site is further limited in that it is crossed by electricity pylons (noted as detracting from the designation) and adjoins the late 19th century reservoir on the northern edge of the modern settlement of Winwick. The contribution made by the A573 as a boundary to the battlefield would remain unaltered and the asset would still be experienced as a large area of agricultural land, bounded largely by agricultural land, interspersed with hedgerows and the A49. There would therefore only be a negligible degree of harm to the heritage value of the battlefield.
- 2.26 In addition, the Heritage Impact Assessment for the Outlying Settlement Allocations (August 2021) [HIA7] concludes that the 'moderate' harm to the Registered Battlefield can be mitigated by ensuring development: is

designed sympathetically to its rural setting; buffers and adequate separation distances are implemented; and existing planting remains in situ/is enhanced where possible.

- 2.27 As such, Bellway's layout will ensure the scale, layout, landscaping, density and massing etc. of development will be sympathetic to the site's relationship with the battlefield. Furthermore, the planning application will be accompanied by a heritage impact assessment and archaeological desk-based assessment.

Service Reservoir

- 2.28 Winwick Water Treatment Works and Service Reservoir (to the south of the site) has several items of United Utilities ("UU") infrastructure that have been historically laid and fall within the allocation red line boundary. The existing pipework comprises live clean water 'out' and raw water 'in' to the waterworks.
- 2.29 There has been ongoing discussions with UU regarding Bellway's proposals since 2019, and there has been no objection raised to the allocation or development of the site.
- 2.30 As such, Bellway's Coloured Sketch Layout (November 2019) incorporates the required 10m easements, while the planning application will provide the additional information set out at paragraph 10.11.7 of the Plan [SP1].

Question 6

What is the background to the specific requirements of Policy OS6? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?

- 2.31 Overall, we find Policy OS6 to be **justified, effective** and **consistent with national policy**. However, as set out within our representations, we believe it would improve the soundness of the Plan [SP1] if some specific requirements were amended in line with the suggested modifications in our response to Question 14.

New Homes

- 2.32 **Part 2** – as we explain within our Matter 9 Statement, there is no evidence to support the blanket provision for older people. Whilst Bellway does deliver housing to meet the needs of everyone, the provision and extent of which should be assessed and agreed at the application stage, having regard to local needs and the latest evidence, as per the approach within Policy DEV2 part 11. Therefore, an amendment would improve the policy from a **justified** and **effective** perspective.
- 2.33 **Part 4** – as we explain within our Matter 9 Statement, there is no substantive evidence to justify the provision for self-build/custom build plots on the site. Instead, the Council should merely indicate its general support for such schemes (as per the St Helens approach), as opposed to specifically requiring provision from sites that are under control of major national housebuilders. Without this change, the plan is **not justified**.

Open Space and Recreation

- 2.34 **Parts 8 & 9** – Bellway does not object to the principle of these requirements, but does reserve the right to comment on any methodology established in relation to calculating financial contributions for built leisure facilities and playing pitches.

Natural Environment

- 2.35 **Part 11** – in light of the Environment Bill, Bellway withdraws its objection to this requirement.

Question 7

Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?

- 2.36 Paragraph 2.22 of the Development Options and Site Assessment Technical Report (September 2021) [O1] explains that incremental growth in the outlying settlements (such as Winwick) can be accommodated by existing infrastructure, with the expansion of existing infrastructure if necessary.
- 2.37 Therefore, from the wording of Policy OS6, Bellway anticipates that it will need to make financial contributions towards primary and secondary school places, primary care capacity, and built leisure facilities and playing pitches. This is in addition to the provision or mitigation of more site-specific matters, including 30% affordable housing, open space, biodiversity net gain, compensatory improvements to the Green Belt, transport improvements, Sustainable Drainage Systems and flood alleviation measures, improvements to the water supply and sewerage network, and air quality.
- 2.38 Bellway can confirm it has already factored some assumptions into the development costs and layout of the scheme. However, ultimately contributions will only be provided where they meet all three tests set out at paragraph 57 of the NPPF and by Regulation 122 of the Community Infrastructure Levy Regulations 2020 (as amended), for example if there is capacity in schools at the time of the planning application, or similarly there is no shortfall in playing provision:
- a. Necessary to make the development acceptable in planning terms;
 - b. Directly related to the development; and
 - c. Fairly and reasonably related in scale and kind to the development.
- 2.39 Therefore, we request an amendment to the supporting text to ensure the policy is **effective**.

Question 8

Is the requirement for Green Belt compensatory improvements justified and appropriate?

- 2.40 Whilst Bellway does not object to Green Belt compensatory improvements in principle, overall we consider that the Council's approach requires further refinement to ensure it is **justified** and appropriate.
- 2.41 Paragraph 142 of the NPPF requires plans to 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.
- 2.42 Paragraph 002 of the 'Green Belt' section of Planning Practice Guidance ("PPG") (Reference ID: 64-002-20190722) states policies for compensatory improvements may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities, and could include 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.
- 2.43 Paragraph 003 (Reference ID: 64-003-20190722) states that identifying the scope of these improvements is likely to require early engagement with landowners and other interest groups, giving consideration to:

- Land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought;
- The scope of works that would be needed to implement the identified improvements and their implications for deliverability;
- The appropriate use of conditions and Section 106 obligations (to secure long-term maintenance of sites).

2.44 However, the approach to compensatory improvements to the Green Belt as currently sought by part 13 of Policy OS6 (and elsewhere within the Plan, including Policy GB1 and the other allocations) is unclear about how an applicant and the decision maker may interpret and respond to this policy requirement. In particular, we are concerned that this could potentially become burdensome for developers in situations where it might be more appropriate for off-site compensation. For example, there is a risk that this could lead to ransom situations with other landowners who have unallocated sites within the Green Belt, unless the intention is that the improvements would be delivered on Council land, but this is not defined by the Plan [SP1].

2.45 By way of comparison, the approach of the recently adopted St Helens Local Plan is to require the details of compensatory improvements to be considered during the Development Management process and assessed on an individual application basis (Policy LPA01). The supporting text (paragraphs 4.3.21-4.3.34) then makes a number of suggestions as to where compensation might be provided, with reference to specific examples of where projects have already been provided. An extract of the relevant sections is provided at **Appendix 1**. This approach is also explained within an information paper (prepared by St Helens Council in response to an Inspector’s action arising at one of the hearing sessions) which is provided at **Appendix 2**.

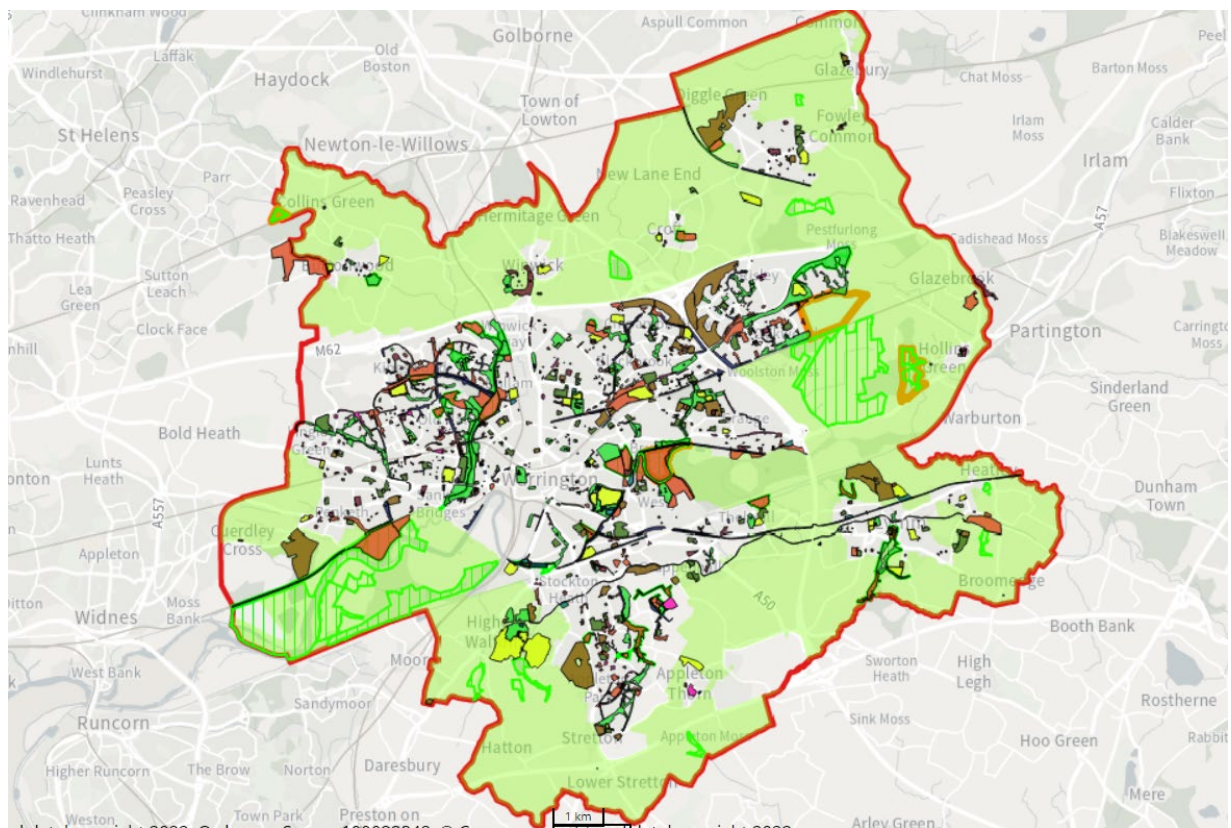


Figure 2.45.1 Extract from Warrington Interactive Map of the Submission Local Plan 2022 and Open Space Audit 2015 (Source: Warrington Borough Council)

2.46 Within Warrington, we note that there are numerous public open space and green infrastructure sites within the Green Belt which could potentially benefit from compensatory improvement (Figure 2.45.1), and generate more tangible benefits than relatively small pockets of open space within allocations.

2.47 Therefore, we would suggest that the Warrington Local Plan should instead follow a more appropriate approach, more akin to the St Helens Local Plan. Specifically, this would involve amending relevant policies (including Policy OS6) and identifying potential projects and schemes where Green Belt compensatory improvements could take place within the supporting text. Furthermore, the Council should consider setting out a mechanism for calculating contributions, which would be proportionate to the scale of development proposed within the Green Belt.

Question 9

Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated?

2.48 Bellway is content that the policy, and the Plan as a whole, already identify and seek to mitigate the most likely potential adverse effects of residential development. Should any additional material planning considerations arise (e.g. those raised by statutory consultees), these would be addressed through the planning application.

Question 10

Is the Council satisfied that safe access to the site can be secured?

2.49 Appendix 1 of Bellway's Delivery Statement (June 2019) (Appendix 1 to our Regulation 19 representations, dated 15 November 2021) contains a detailed vehicular access design (prepared by Bellway's transport consultant, Eddisons). This proposes to take a primary access from Golborne Road (A573) which is an adopted highway. This will be provided via a new 6m wide junction with 2m footways to each side.

2.50 The vehicular access is designed to accord with 'Manual for Streets' guidance and Bellway confirms that the design embodies the Local Highway Authority's design principles, with visibility splays of 2.4m x 43m being achievable without the need for third party land.

Question 11

Is the development proposed viable and deliverable within the period envisaged, noting that it is anticipated that first homes would be completed in 2024/5?

2.51 Bellway can confirm that the development of the site is viable and deliverable within the period envisaged.

2.52 Please see our response to Question 13 for Bellway's more detailed delivery timescales.

Question 12

What is the situation in relation to land ownership and developer interest?

2.53 Bellway has the site secured under an option agreement with the landowner. Bellway is contractually required to promote the site through the Plan and submit a planning application as soon as reasonably practicable and commercially sensible.

Question 13

How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?

2.54 Bellway’s envisaged delivery timescales are as follows:

- Appoint full consultant team to progress planning application – **August 2022**;
- Develop scheme, undertake further technical work and surveys, pre-app engagement, pre-app meeting etc. – **August-September 2022**;
- EIA screening – **August-September 2022**;
- Submit full application – **October 2022**;
- Determination/committee resolution – **June 2023** (based on the Local Plan adoption timescales);
- S106 signed – **July 2023**;
- Discharge conditions – **September 2023**;
- Material start on site, site preparation works/infrastructure etc. – **September 2023**;
- First unit completions – **Spring 2024**;
- Annual rate of delivery thereafter – **40 dwellings per annum**;
- Final unit completed and occupied – **Summer 2028**.

2.55 We anticipate the timing (i.e. triggers) of the payment of financial contributions towards off-site infrastructure requirements would be negotiated with the Council during the drafting of the S106. It would then be for the Council to determine how, when and where the monies would be spent.

Question 14

Are any main modifications necessary for soundness?

2.56 As stated above, Bellway suggests the following Main Modifications would improve the soundness of Policy OS6:

Part 2 – to improve the policy from a justified and effective perspective

2.57 Amend part 2:

*“2. A range of housing tenures, types and sizes will be required in order to ensure development contributes to meeting the Borough’s ~~general and specialist~~ housing needs **(to be determined at the application stage)**, including family homes with gardens, ~~specific provision for older people and for younger people looking to purchase their first home.~~”*

Part 4 – to improve the policy from a justified perspective

2.58 Delete part 4:

“~~4. Specific provision should be made for self-build/custom build plots, subject to demand as demonstrated by the Council’s self-build register.~~”

Part 13 – to improve the policy from a justified perspective

2.59 Replace part 13 (and relevant other policies of the Plan) with a new approach to Green Belt compensatory improvements, mirroring that of the St Helens Local Plan (**Appendix 1**).

Supporting text – to improve the policy from an effective perspective

2.60 Insert new paragraph:

“10.11.10 The requirement for the developer to make contributions towards infrastructure in line with the policy will be subject to Regulation 122 of the Community Infrastructure Levy Regulations 2020 (as amended) to ensure that any planning obligations are:

a) necessary to make the development acceptable in planning terms;
b) directly related to the development; and
c) fairly and reasonably related in scale and kind to the development.”

Supporting text – to improve the policy from an effective perspective

2.61 Insert new paragraphs at the appropriate part(s) of the Plan to explain the revised approach to Green Belt compensatory improvements, including identifying potential projects and schemes where these could take place.

2.62 Furthermore, set out a mechanism for calculating such contributions.

Appendix 1

Extract from St Helens Local Plan (Policy LPA01)

4. Core Policies

4.1 Policy LPA01: Spatial Strategy

Policy LPA01: Spatial Strategy

1. The sustainable regeneration and growth of St Helens Borough through to 2037 and beyond will be focussed (as far as practicable, having regard to the availability of suitable sites) on the Key Settlements, namely St Helens Core Area, Blackbrook and Haydock, Newton-le-Willows and Earlestown, Rainford, Billinge, Garswood and Rainhill.
2. New development will be directed to sustainable locations that are appropriate to its scale and nature and that will enable movements between homes, jobs and key services and facilities to be made by sustainable non-car modes of transport.
3. The re-use of suitable previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites. This will be encouraged through the use of Policies LPA07 and LPC02 to support the delivery of sites, particularly those on Previously Developed Land, by, for example, setting lower thresholds for developer contributions on previously developed sites to reflect the higher costs and lower sales values typically associated with redeveloping such sites where appropriate.
4. Comprehensive regeneration of the wider Borough will be delivered by the English Cities Fund Regeneration Partnership, through the provision of quality housing, new commercial activity, upgraded infrastructure and the overall improvement of the social and economic viability of the Borough on a phased basis.
5. 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 up to 31 March 2037, 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 2037. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following an update of this Plan. Within the remaining areas of Green Belt (shown on the Policies Map) new development shall be regarded as inappropriate unless it falls within one of the exceptions set out in the National Planning Policy Framework (or any successor document). Inappropriate development in the Green Belt shall not be approved except in very special circumstances. **Delivery of compensatory improvement measures within areas remaining in the Green Belt will be required following any release of Green Belt land for development purposes.**

Details of such improvements will be considered during the Development Management process and assessed on an individual application basis.

6. Substantial new employment development (set out in Policy LPA03 and excluding town centre uses) will take place on large sites that are capable of accommodating large employment buildings (over 9,000m²) and are close to the M6 and M62. High quality road, public transport and active travel links will be required between existing and proposed residential areas, particularly those with high deprivation levels, and areas of employment growth. Existing employment areas will be retained where they are suitable and viable for this use in order to maintain a diverse portfolio of accessible employment opportunities across the Borough. Suitable development that would diversify the rural economy will also be supported.
7. Parkside West and Parkside East form transformational employment opportunity sites that will make a major contribution to the economic development of St Helens Borough, the Liverpool City Region and beyond. Development that prejudices their development in accordance with Policies LPA03, LPA09 and LPA10 will not be allowed.
8. The preferred locations for new town centre development shall be within St Helens Town Centre (as the Borough's principal town centre), Earlestown Town Centre, and the Borough's network of district and local centres, in line with Policies LPB01, LPB02 and LPC04.
9. The quality of life, health and wellbeing of St Helens Borough's residents, workers and visitors and the quality of the natural environment will be supported by:
 - a) taking steps to maintain, enhance, connect and / or expand the Borough's network of ecological, open space and recreational sites and greenways in accordance with Policy LPA08;
 - b) seeking improvements to the quality of open space within and around new development;
 - c) requiring new development proposals to mitigate their contribution to climate change and to adapt to its impacts;
 - d) supporting the delivery of landscape reclamation and improvement projects in locations such as the Bold Forest Park and Sankey Valley Park; and
 - e) requiring development to support healthy lifestyles in accordance with Policy LPA12.
10. The provision of a convenient, safe, and sustainable transport network, and the delivery of improvements to the network, will be required in line with Policy LPA06.
11. New development that would deliver regeneration within the key settlements and accord with other Plan policies will be supported. Regeneration in these settlements will also be promoted by (in addition to the measures set out

Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

- 4.3.20 In addition, the Council aims to protect and enhance remaining areas of Green Belt by seeking the delivery of compensatory improvement measures. In accordance with paragraph 142 of the NPPF, delivery of compensatory improvement measures will be sought when sites are released from the Green Belt for development as part of this Plan. Such measures should enhance the environmental quality and accessibility of the remaining Green Belt land, amongst other improvements. Further guidance is provided within the National Planning Practice Guidance (Green Belt Land).
- 4.3.21 The delivery of compensatory improvements will be supported by a number of policies within this Plan. For example, policies LPA08, LPC05-10 and LPC12 all have an environmental focus, which will support the delivery of Green Belt compensatory measures. Additionally, Development Management focussed policies, including LPD01-03 and LPD09 will support this.
- 4.3.22 Beyond the policy framework in this Plan to support the delivery of Green Belt compensatory measures, as well as other development plan documents, such as the Bold Forest Park AAP, the Council will continue to build on project improvements delivered to date. Improvements include those at the strategic level, such as at Bold Forest Park, for example the expansion of tree cover and the delivery of improved recreational facilities. A further strategic level project is the Sankey Valley Corridor Nature Improvement Area (NIA), which is focussed on enhancing the aquatic environment as well as the surrounding natural environment within the catchment, and improvements in environmental management practices. Improvements in this location have included accessibility enhancements, including walking, and cycling infrastructure and new signage, enabling increased access to the Green Belt for residents and visitors. It is expected that further improvements can be delivered at these two strategic projects as part of Green Belt compensatory measures.
- 4.3.23 There are further sites around the Borough that could be improved as part of Green Belt compensatory measures including those which form part of the Knowsley and St Helens Mosslands Nature Improvement Area (NIA), comprising three sites in the north of the Borough, near Rainford, one by Parr and one by Newton-le-Willows (see appendix 9). In addition, there are many Local Wildlife Sites (LWS) in the Borough, which are identified on the Policies Map, and appendix 8 of this Plan shows that there are several LWS in each ward of the Borough, with many of these wards having LWS in the Green Belt. There are also three Local Nature Reserves located within the Green Belt. Compensatory measures can also occur at non-designated sites within the Green Belt, for example, initiatives related to alleviating the effects of flooding events, such as those implemented previously in the settlement of King's Moss. Therefore, there are clear opportunities for localised Green Belt compensatory measures to be delivered on such designated and non-designated sites across the entire Borough through the delivery of environmental improvements, in addition to the two identified strategic sites referred to above.

Appendix 2

St Helens Green Belt Compensatory Measures Information Paper

1. Introduction

1.1 This paper has been prepared in response to action 7 recorded in the Matter 3 session:

“Produce a note to explain how the Council intends to approach the delivery of compensatory improvements (and consideration of associated main modifications to the Plan).”

1.2 This paper summarises the Council’s approach to providing compensatory improvements to the Green Belt, including where such improvements could be delivered over the Plan period throughout the Borough of St Helens.

1.3 This paper briefly summarises:

- the policy context relevant to Green Belt Compensatory Improvements (Section 2);
- the locational opportunities to deliver Green Belt compensatory improvements within St Helens Borough (Section 3); and
- the proposed modifications to St Helens Borough Local Plan (Section 4).

1.4 This paper should be read in conjunction with other evidence base documents, including:

- St Helens Council Draft Nature Conservation SPD (October 2020), (SD019)
- Developing the Spatial Strategy Background Paper (October 2020), (SD026)
- Bold Forest Area Action Plan (July 2017), (LOC004)
- The Mersey Forest Plan (2014), (NAT007)
- Liverpool City Region Ecological Network (2015), (NAT006)
- Sankey Catchment Action Plan (2018), (FLO002)

2. Policy Context

2.1 This section outlines the policy framework at the national and local level of relevance to compensatory improvements in the Green Belt.

National

National Planning Policy Framework (February 2019)

- 2.2 The National Planning Policy Framework (NPPF) 2019 sets out the Government's planning policies for England and how these are expected to be applied.
- 2.3 Chapter 13 highlights the importance of Green Belts, setting out their five purposes, whilst also outlining how Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified (paragraphs 133-137).
- 2.4 Where it has been concluded that Green Belt land release is necessary for development, paragraph 138 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”*.
- 2.5 In addition, NPPF paragraph 141 states *“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”*.

Planning Practice Guidance (PPG): Green Belt (2019)

- 2.6 The Green Belt section (paragraph 002) supports paragraph 138 of the NPPF, stating that policies for compensatory improvements *“may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies”*.
- 2.7 The same PPG paragraph sets out several examples of potential compensatory improvements measures, 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”.*

Local

St Helens Borough Local Plan Submission Draft 2020-2035 (LPSD)

- 2.8 Whilst the Plan does not make specific reference to the provision of compensatory measures to offset the impact of removing land from the Green Belt, there are a number of policies (and associated reasoned justification) which support the principals of improving the Green Infrastructure network, biodiversity and habitat connectivity, and more generally supporting environmental quality improvements, including through policies LPA02, LPA03, environmentally focussed policies LPA09, LPC05-10 and LPC12, and development management focussed policies LPD01-03 and LPD09.
- 2.9 Notwithstanding the above broader policy framework, the Plan would benefit from a modification to specifically reference the need to provide compensatory measures, and some associated explanation. See section 4 for proposed modification wording.

St Helens Council Nature Conservation Supplementary Planning Document (SPD) 2020 (Draft)

- 2.10 As above, the NPPG provides one example of compensatory improvements as being the improvement of biodiversity. In this context, it is important to note the draft Nature Conservation SPD the Council has prepared. It will provide guidance on how the range of policies in the Local Plan Submission Draft (LPSD) will be implemented, including, but not limited to LPA09, LPC06, LPC07, LPC08 and LPC10.
- 2.11 The SPD will therefore provide part of the policy framework to enable the delivery of compensatory improvements to offset the removal of land from the Green Belt for development.

Bold Forest Park Area Action Plan (2017)

- 2.12 The Bold Forest Park Area Action Plan (BFP AAP) forms part of the development plan for St Helens Borough. It sets out the detailed policies and actions needed to develop and sustain the Bold Forest Park and is to be read alongside the other documents in the Development Plan for the Borough.

- 2.13 The BFP AAP overarching policy BFP1: A Sustainable Forest Park, indicates that environmental sustainability is an important element of the Forest Park vision alongside supporting a number of economic and social objectives. Increasing tree coverage and enhancing biodiversity through integrating wildlife habitats into an ecological habitat in the Forest Park are key issues that the AAP aims to address.
- 2.14 Policy BFP ENV1: Enhancing Landscape Character and BFP ENV2: Ecological Network, both set out a positive approach towards protecting and enhancing the existing natural environment.
- 2.15 Whilst the Local Plan does seek to bring forward some land within the Bold Forest Park to meet identified development needs, a significant amount of the Bold Forest Park area will remain within the Green Belt. Therefore, the AAP provides a vision and a framework through which compensatory measures can be delivered at a strategic scale to offset the release of other Green Belt land proposed for development.

3. St Helens Borough Green Belt Compensatory Improvements - Location Opportunities

- 3.1 From a strategic perspective, St Helens Borough has two strategic areas that are of great importance regarding the delivery of compensatory improvements in the Green Belt, providing a wealth of opportunities to do so. They are:
- Bold Forest Park
 - Sankey Valley Corridor
- 3.2 In addition, it is important to recognise the role of the wider LCR Ecological Network. Nature Improvements Areas (NIA's) are a key part of this network and also provide opportunities to deliver compensatory improvements in the Green Belt. St Helens Borough has two identified NIA's: 1) Knowsley and St Helens Mosslands and 2) the Sankey Valley Corridor.
- 3.3 Apart from the strategic areas, there are many other locations across the Borough where improvements have been delivered and present further opportunities to deliver compensatory improvement measures to offset the release of Green Belt land for development. For example, Local Nature Reserves (LNR) and Local Wildlife Sites (LWS) provide opportunities to deliver compensatory improvements through, for example, improving and supporting habitat management and connectivity of environmental assets.
- 3.4 In recent years, progress has been made through a range of initiatives to improve the environmental quality of the areas listed above and such is

discussed further below. However, it is important to recognise there are opportunities for further improvements to be made, which could be delivered through Green Belt compensatory measures.

- 3.5 A location plan illustrating all of the strategic and localised sites mentioned above can be found in appendix 1. Moreover, detailed plans of these sites are included within either the LPSD or the evidence-based documents supporting the proposed plan. Please refer to Figure 5 included within the Bold Forest Garden Suburb position statement (SD027) for a detailed location plan of the Bold Forest Park. Detailed location plans for all NIA sites are included within appendix 9 of the LPSD. Lastly, all LNR and LWS within St Helens Borough are illustrated on the Local Plan Policies Map.

Bold Forest Park

- 3.6 The area known as Bold Forest Park is situated in the South of St Helens Borough near to the settlements of Bold, Clock Face, Sutton and Rainhill.
- 3.7 As part of the wider development plan for the Borough, an Area Action Plan was adopted in 2017, known as the Bold Forest Park Area Action Plan (BFP AAP). The BFP AAP sets out the detailed policies and actions needed to develop and sustain the Forest Park through the restoration of the former industrial working landscape. It sets out a framework for guiding sustainable development alongside encouraging the enhancement of the natural environment.
- 3.8 One of the main aims of the BFP AAP is to significantly increase tree coverage across the entire Bold Forest Park area, the majority of which is proposed to remain in the Green Belt in the LPSD. St Helens Borough Council have and will continue to work with partnership organisations such as the Mersey Forest to ensure that tree planting remains a constant activity occurring within the Forest Park.
- 3.9 Examples of previous as well as current initiatives within the Bold Forest Park, focussed upon tree planting include:
- the Trees and Climate Initiative,
 - the Urban Tree Challenge and,
 - the Northern Forest.
- 3.10 The above initiatives not only support local policies. Regional strategies are also being successfully implemented, such as those set out within the Mersey Forest Plan (NAT007).

- 3.11 The BFP AAP also has a focus on increasing the visitor economy of the Forest Park, with specific reference to the creation and enhancement of visitor hubs and the associated infrastructure.
- 3.12 It is expected that Green Belt compensatory measures can be secured as part of any future planning permissions on sites removed from the Green Belt to deliver improvements in line with the AAP throughout the Bold Forest Park. It should also be noted that this is a strategic location with a wide catchment and recognition across the Liverpool City Region as such.

Sankey Valley Corridor Nature Improvement Area (NIA)

- 3.13 The Sankey Valley Corridor Nature Improvement Area (NIA) begins in Billinge in the North of St Helens and travels through many settlements including Blackbrook and Newton-Le-Willows through to the Borough's South-East boundary with Warrington. Due to the extensive length of this corridor, access to the natural environment is enabled for many residents and visitors to St Helens Borough.
- 3.14 Within this corridor, a prominent natural asset is the Sankey Valley canal. The Sankey Catchment Action Plan (FLO002), adopted in 2018, provides a framework which will enable enhancements of the aquatic environment as well as the surrounding natural environments located within the catchment area to occur. Furthermore, this plan also supports improvements relating to environmental management practices, and therefore this will contribute positively to improving the overall environmental quality of this NIA.
- 3.15 A primary aim of the catchment plan is to improve the water quality throughout the entire Sankey catchment area. It is acknowledged that the implementation of projects which aim to address issues of flooding will support improvements in water quality whilst also supporting improvements to biodiversity. Resultantly, the Sankey Catchment Action Plan (FLO002) supports the ecological enhancements and management priorities listed in the Sankey Valley Corridor NIA profile (see NAT006, appendix 6 NIA Focus Area 06).
- 3.16 Improvements have occurred along the Sankey Valley corridor in recent years. Funding for active travel schemes through the Sustainable Transport Enhancement Package (STEP) has enabled walking and cycling infrastructure to be improved and extended along the Sankey Valley Canal. Therefore, increasing access to Green Belt land for the residents and visitors of St Helens Borough.
- 3.17 Another example of where improvements within the Sankey Valley Corridor NIA have taken place is at Carr Mill Dam. However, it should be noted that whilst improvements have occurred within this location, they have not been

delivered recently. For example, more than 10-years ago, as part of a Heritage Lottery Funded project, access improvements including footpath surfacing and new signage were delivered.

- 3.18 Resultantly, it is expected that Green Belt compensatory measures can be secured as part of any future planning permissions on sites removed from the Green Belt to deliver environmental quality improvements along the Sankey Valley Corridor NIA.

Knowsley and St Helens Mosslands Nature Improvement Area (NIA)

- 3.19 Located in the North of St Helens close to the settlements of Rainford and Kings Moss are three sites that are contained within the Knowsley and St Helens Mosslands Nature Improvement Area (NIA). There are also two other sites within this NIA in the Borough, one located in Parr and the other in Newton-Le-Willows.
- 3.20 The primary objective of these sites is to protect, restore and enhance the lowland bog and fens habitat that are present at such locations. It is considered that future enhancement of these specific habitats will occur as a result of national biodiversity net gain strategies currently being reviewed as part of the Environmental Bill legislation. They also present opportunities for improvements to be delivered as part of providing Green Belt compensatory measures.

Other Locations

- 3.21 As mentioned previously above, other locations where environmental improvements projects have and will continue to take place include at the many local wildlife sites (LWS) and local nature reserves (LNR) located across St Helens Borough.
- 3.22 Appendix 1 illustrates the extensive distribution of LWS and LNR across the Borough of St Helens. From the plan included within appendix 1, it is evident that many LWS as well as three LNR are situated within the Green Belt. Furthermore, as indicated in appendix 8 of the LPSD, each ward within St Helens contains several LWS, with many ward areas having access to LWS situated within the Green Belt. Resultantly, this provides opportunities for localised projects to occur and environmental improvements to be delivered across the entire Borough of St Helens, including through the mechanism of delivering Green Belt compensatory improvements.

- 3.23 In addition, compensatory improvements could also occur at non-designated sites situated within the Green Belt. For example, initiatives to help alleviate the potential effects associated with flooding events have been implemented within the settlement of King's Moss. Natural flood management solutions such as the creation of debris dams and the introduction of sustainable urban drainage (SUD's) have been implemented to support the 'Slow the Flow' approach adopted as part of the Sankey Catchment Action Plan (FLO002). As a result, environmental quality improvements are not solely seen within the King's Moss settlement, but improvements are evident across a wider area of St Helens Borough.

4. Proposed Modifications to the Local Plan

- 4.1 The Council recognises that the proposed Local Plan does not reference the need for Green Belt compensatory improvements following the release of any Green Belt land. As a result, it would be beneficial for a modification, in the form of additional wording, to be included within policy LPA02.
- 4.2 Outlined below is the proposed modification to policy LPA02, section 4:
- "4. 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. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan. Within the remaining areas of Green Belt (shown on the Policies Map) new development shall be regarded as inappropriate unless it falls within one of the exceptions set out in the National Planning Policy Framework (or any successor document). Inappropriate development in the Green Belt shall not be approved except in very special circumstances. **Delivery of compensatory improvement measures within areas remaining in the Green Belt will be required following any release of Green Belt land for development purposes. Details of such improvements will be considered during the development management process and assessed on an individual application basis**".
- 4.3 Additionally, a further modification to the reasoned justification of policy LPA02 is considered necessary. The inclusion of an additional paragraph clarifying the requirement for Green Belt Compensatory Improvement

measures is proposed to follow on from paragraph 4.6.15 of the submitted LPSD along the lines of:

“In addition, the Council aims to protect and enhance remaining areas of Green Belt by seeking the delivery of compensatory improvement measures. In accordance with paragraph 138 of the NPPF, delivery of compensatory improvement measures will be sought when sites are released from the Green Belt for development as part of this plan. Such measures should enhance the environmental quality and accessibility of the remaining Green Belt land, amongst other improvements. Further guidance is provided within the National Planning Practice Guidance (Green Belt Land).”

- 4.4 Resultantly, the proposed modifications will provide clarity on the expectations to deliver compensatory improvements to offset the release of Green Belt land for development, and a flexible framework for doing so across the Borough of St Helens.

5. Conclusion

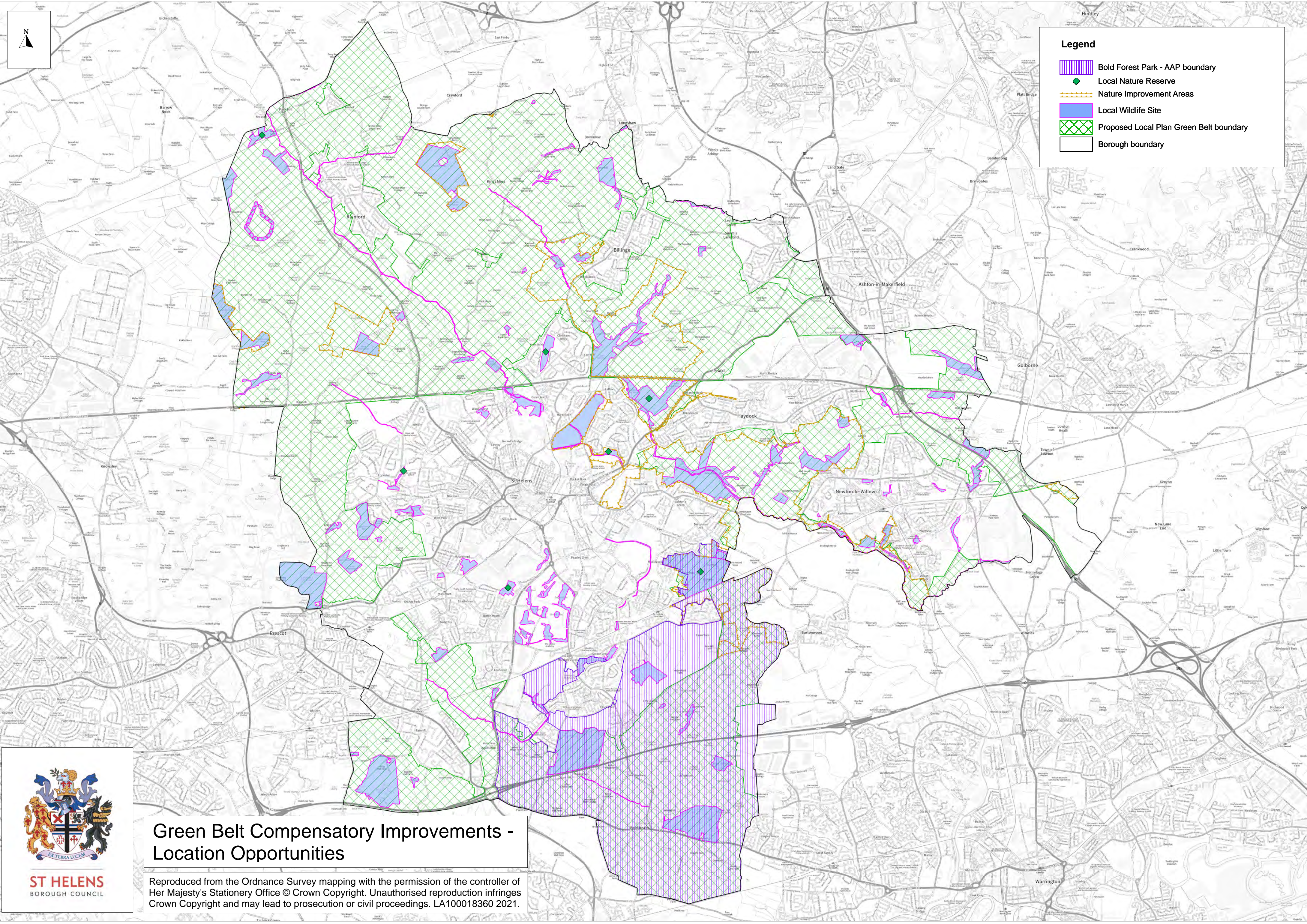
- 5.1 To conclude, St Helens Borough Council will take a proactive approach towards securing compensatory improvements in the Green Belt to offset the release of other Green Belt land for development, building on environmental and recreational improvements already delivered within the Green Belt.
- 5.2 Green Belt compensatory improvements will be delivered in a variety of locations including those outlined above (such as strategic locations, NIA's, LWS and LNR as well as other non-designated areas within the Borough). This will ensure that improvements within the Green Belt occur throughout the Borough.
- 5.3 The strategic locations identified (Bold Forest Park and Sankey Valley) will be seen as a focal point for compensatory improvements. This is primarily due to these locations being strategic in nature and having a multi-functional, significant and vitally important role for achieving many of the wider aims and objectives of the Local Plan such as delivering sustainable and healthy communities.
- 5.4 Nevertheless, the Council also recognise that improvements within the Green Belt should occur across the Borough of St Helens, reflecting the broad geographical distribution of development proposed in the Plan, and the associated release of Green Belt land to enable this. Facilitating improvements across a wider geographical range will provide the entire population of St Helens with areas to enjoy and benefit from higher quality

Green Belt locations. Thus, resulting in greater environmental and social benefits to be achieved.







- 5.5 Collaboration with landowners, developers and partnership organisations has been, and will continue to be, critically important to ensure the successful delivery of improvements to the Green Belt. Working in partnership supports the development of a coherent approach towards delivering successful initiatives that enable multiple positive outcomes to be achieved, for example; improving access to Green Belt, expanding the ecological network and expanding the green infrastructure network of St Helens Borough.
- 5.6 To conclude, the Council's approach towards the delivery of compensatory improvements will be effective during the plan period and beyond.

Appendix 1:

Location plan illustrating areas of opportunities for the delivery of Green Belt Compensatory Improvements within the Borough of St Helens.



Legend

-  Bold Forest Park - AAP boundary
-  Local Nature Reserve
-  Nature Improvement Areas
-  Local Wildlife Site
-  Proposed Local Plan Green Belt boundary
-  Borough boundary




ST HELENS
BOROUGH COUNCIL

Green Belt Compensatory Improvements - Location Opportunities

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