



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

**COPIES OF REGULATION 20
REPRESENTATIONS (REGULATION 22 (1) (D))
DOCUMENT**

REPRESENTATION ORDER

RO1959

SEPTEMBER 2020

RO1959



St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:15

Cc:

[REDACTED]

Hide Details

From: Andrew Bickerdike [REDACTED] <[REDACTED]>

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc: [REDACTED]

4 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf



Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [REDACTED] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

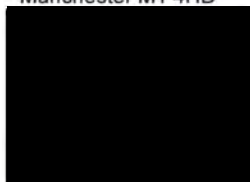
I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike
Director

Turley

1 New York Street
Manchester M1 4HD



Think of the environment, please do not print unnecessarily

This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions



RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:16

Cc:

[REDACTED]

Hide Details

From: Andrew Bickerdike [REDACTED]

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc: [REDACTED]

1 Attachment



Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike
Director

Turley

1 New York Street
Manchester M1 4HD



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This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions

From: Andrew Bickerdike

Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk

Cc: Richard Knight [REDACTED]

Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to [REDACTED] outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards



RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:17

Cc:

"Richard Knight" [REDACTED]

Hide Details

From: Andrew Bickerdike [REDACTED]

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc: "Richard Knight" [REDACTED]

1 Attachment



Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike
Director

Turley

1 New York Street
Manchester M1 4HD

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This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions

From: Andrew Bickerdike

Sent: 13 March 2019 16:16

To: planningpolicy@sthelens.gov.uk

Cc: [REDACTED]

Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike

Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk



Representation to Pre-submission Local Plan on behalf of Peel Holdings

Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/05/2019 15:55

Hide Details

From: Andrew Bickerdike [REDACTED]

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf



Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike
Director

Turley

1 New York Street
Manchester M1 4HD



Think of the environment, please do not print unnecessarily

This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Turley bank account details will not change during the course of an instruction and we will never change our bank account details via email. If you are in any doubt, please do not send funds to us electronically without speaking to a member of our team first to verify our account details. We will not accept liability for any payments into an incorrect bank account. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions



RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/05/2019 15:56

Hide Details

From: Andrew Bickerdike [REDACTED]

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments



Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike
Director

Turley

1 New York Street
Manchester M1 4HD

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From: Andrew Bickerdike

Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards



RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:57

Hide Details

From: Andrew Bickerdike [REDACTED]

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike
Director

Turley

1 New York Street
Manchester M1 4HD



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From: Andrew Bickerdike

Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Turley

EL0228/01.41

Policies:

LPA04,05,06

Sites 1ES, 2ES

GBP-036, GBP-053

SA, Green Belt Review

SHLAA & EVA

13 May 2019

Delivered via email

[REDACTED]
Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Dear [REDACTED]

**ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD
PEEM2091**

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street
Manchester. M1 4HD
T 0161 233 7676 turley.co.uk

1. Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North
2. Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South
3. Land south west of Junction 23 – c.32.4ha – being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site¹ for employment uses and the (majority of) the Haydock Green site² for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

¹ Policy LPA04; Ref EA4

² Policy LPA05; Ref HA10

- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough

including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
 - Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy
-

In order to resolve these deficiencies and ensure the Plan can be processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

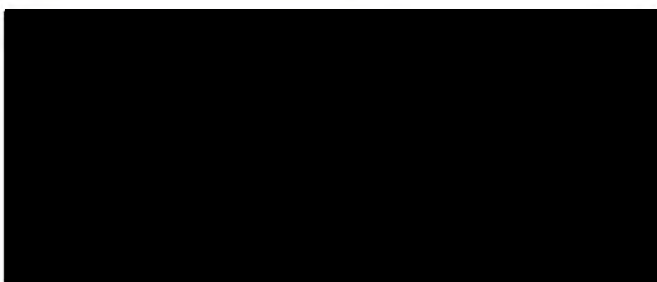
It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely



Andrew Bickerdike
Director



ELO22 8/11
Policy LPA04,
LPA05
GBR 053a

Representor Details

Web Reference Number	WF0005
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04 and LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

This form relates to Peel's additional submission in relation to its landholding at Haydock Green - see revised Paper 1 (Overarching Representation)

7. Please set out modification(s) you consider are necessary

See Paper 1 of Peel's submission

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

This representation raises matter of strategic relevance / importance to the Local Plan and its soundness

Representor Details

Web Reference Number	WF0077
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester , M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05.1
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email, specifically section 9 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:51:24 PM
---------------	-----------------------

Representor Details

Web Reference Number	WF0078
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04.1
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email, specifically section 3 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of the Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:48:13 PM
---------------	-----------------------

Representor Details

Web Reference Number	WF0079
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester M1 4HD, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Economic Viability Assessment

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email, specifically section 10 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:44:36 PM
---------------	-----------------------

Representor Details

Web Reference Number	WF0080
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email and specifically sections 3, 5 and 9 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:41:59 PM
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Representor Details

Web Reference Number	WF0081
Type of Submission	Web submission
Full Name	c/o agent c/o c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	Appraisal of site Peel's land holdings at Haydock through the SA process
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email and specifically sections 3, 5 and 9 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:38:46 PM
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Representor Details

Web Reference Number	WF0085
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04.1
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email, specifically section 3 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:32:41 PM
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E0228/20

E0228/22

Policy SHLAA
LPA05**Representor Details**

Web Reference Number	WF0087
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	SHLAA

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email, specifically Paper 3 and sections 8 and 9 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:29:35 PM
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Representor Details

Web Reference Number	WF0088
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06 (land safeguarded for housing)
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representations reports submitted via email, specifically section 8 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significant to the soundness of the Local Plan

Response Date	3/13/2019 12:26:59 PM
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Representor Details

Web Reference Number	WF0090
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05.1
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email, specifically Paper 1 sections 6, 7, 8, 9 and 11 and Papers 2 and 3

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:23:50 PM
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Representor Details

Web Reference Number	WF0091
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email, specifically Paper 2 and section 6 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:20:07 PM
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Representor Details

Web Reference Number	WF0092
Type of Submission	Web submission
Full Name	c/o agent c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email, including section 5 and 11 of Paper 1

7. Please set out modification(s) you consider are necessary

See section 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise issues of strategic significant to the soundness of the Local Plan

Response Date	3/13/2019 12:16:34 PM
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Representor Details

Web Reference Number	WF0093
Type of Submission	Web submission
Full Name	C/O agent C/O agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representations submitted by email and specifically sections 3, 4 and 11 of Paper 1

7. Please set out modification(s) you consider are necessary

See representations submitted by email and specifically sections 3, 4 and 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic relevance to the soundness of the Local Plan

Response Date	3/13/2019 12:13:41 PM
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EL0228/01-04,
Policy LPA04

Representor Details

Web Reference Number	WF0095
Type of Submission	Web submission
Full Name	c/o Agent c/o Agent c/o Agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o Agent c/o Agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

See representation reports submitted via email and specifically sections 2 and 11 of Paper 1

7. Please set out modification(s) you consider are necessary

See representation reports submitted via email and specifically sections 2 and 11 of Paper 1

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Representations raise matters of strategic relevance to the Local Plan and its soundness

Response Date	3/13/2019 12:08:04 PM
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EL0228/01-12

EL0228/18-20

EL0228/23-41

(EL0228/13-17 & 21-22
in Papers 2 and 3)

EL0228/01-41
Policies LPA 04,
05, 06,
Sites 1ES, 2ES
GRP 036, GRP 053
SA, Green Belt
Review, SHCAA
EVA

St Helens Borough Local Plan 2020 - 2035

Submission Draft

Representation by Peel Holdings (Land and
Property) Limited

Paper 1: Overarching representation

May 2019

Turley

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Contact

Andrew Bickerdike



Executive Summary

1. This report is one of three papers submitted by Peel Holdings (Land and Property) Ltd ("Peel") which, together, comprise Peel's submission to the St Helens Pre-submission Draft Local Plan (PSLP). The full suite of reports is as follows:
 - Paper 1: Overarching representation (this paper)
 - Paper 2: Assessment of housing needs
 - Paper 3 Assessment of housing land supply
2. The representations relate to Peel's land interests within St Helens, located within the Haydock area of the Borough. In summary the land it is promoting for development comprises:
 - Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North
 - Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South
 - Land south west of Junction 23 – c.32.4ha – being promoted for housing development or alternatively logistics development, in the plan period, known as Haydock Green
3. This representation presents a detailed case for the allocation of Peel's land interests for development during the plan period or as safeguarded land for development beyond the plan period. It outlines that these sites represent sustainable development opportunities capable of delivering unique benefits for the Borough without giving rise to strategic level harm to the Green Belt if released from their current designations.
4. The representation sets out a number of strategic deficiencies in the PSLP including in relation to the proposed housing and employment land requirement, the developable land supply upon which the PSLP is reliant, the distribution of housing land across the Borough and the process of selecting housing sites for allocation. This results in a sub-optimal and unsound plan being progressed.
5. Soundness can in part be corrected through the allocation of the above sites as proposed by Peel.
6. The following represents a summary of the principal areas of objection to the PSLP, which are outlined and substantiated in this report (Paper 1) and the associated Papers 2 and 3.

Basis of objection

Specific areas of objection

EMPLOYMENT STRATEGY

A failure to plan for meeting the objectively assessed need for employment development (Policy LPA04)	The PSLP projects future requirements based on past take up which has itself been limited by a constrained land supply. The PSLP does not include a sufficient uplift to the baseline requirement to reflect the changing logistics market and the stimulant provided by significant infrastructure investment in the Borough and wider Liverpool City Region. The total residual employment land requirement should be increased from 215ha to 278 ha as a result.
Insufficient land is allocated for employment development during the plan period (Policy LPA04.1)	There is a need to identify land capable of delivering in the order of 60 ha of additional employment development during the plan period.
Failure to allocate Haydock Point North for employment development during the plan period and instead allocating the site as safeguarded land for development beyond the plan period (Policy LPA06)	There is no justified reason for not permitting the site to come forward for development during the plan period having identified exceptional circumstances to justify its release from the Green Belt and given progress made with respect to the current outline planning application. Not only is the site needed for development during the plan period, due to the identified shortfall in employment land, there are no insurmountable constraints to its delivery from an environmental, technical or highways point of view. The site will not prejudice the delivery of desired improvements to Junction 23 of the M6 and is highly attractive to the market due to its size, strategic accessibility and ability to accommodate units of c 1m sq ft in size.
The Council's appraisal of the Haydock Point North site through the Green Belt Review (GBR) is flawed	There is no technical evidence presented to substantiate the conclusions in the GBR regarding the site and its development potential. On the contrary, technical evidence supplied by Peel as part of the current planning application has demonstrated that the site is not affected by any environmental constraints.

Insufficient land is allocated as safeguarded to meet potential employment land requirements beyond the plan period (Policy LPA06)	The PSLP should make provision for safeguarded land for at least 10 years beyond the plan period, rather than 8.68 years as proposed. This would be equivalent to 126.1 ha of land to be safeguarded for employment development based on an increased OAN as proposed by Peel. This would increase to 189.15 ha if safeguarded land were allocated for 15 years beyond the plan period.
Failure to allocate Peel's land at Haydock Point South safeguarded land for employment development beyond the plan period (Policy LPA06)	In the context of a need to identify 60 ha of additional land for employment development during the plan period, including allocating Peel's land to the North East of Junction 23 for employment development (rather than as safeguarded land), and to increase the overall quantum of safeguarded land for employment development beyond the plan period, there is a need to identify an additional supply of suitable land to be safeguarded for future employment development. In this context, Peel's land to the south east of Junction 23 is a suitable site for a safeguarded allocation.
The Council's appraisal of the Haydock Point South site through the Green Belt Review (GBR) and Sustainability Appraisal is flawed	The Council's evaluation of the site through the Sustainability Appraisal (SA) process and GBR is flawed and inaccurate conclusions are drawn regarding the sustainability of the site as a potential employment location and the Green Belt value of the existing land.
As an alternative to the allocated for housing (see below), the Haydock Green site should be allocated for large scale logistics, or at the very least safeguarded for such.	The site presents a sustainable development opportunity. It is argued that its allocation for residential development would overcome significant issues of soundness with the Plan as presently drafted. If this is not accepted, the site should in any event be allocated for employment use, given the strong market appeal and suitability of the site for large scale logistics. The site would deliver significant highways and transport benefits in delivering part of the desired improvement works to Junction 23 of the M6, as a stated objective of the PSLP. The site is unique in this regard. Peel does not agree with the Council's appraisal of the site through the SA and GBR processes. The site makes a very limited contribution to the St Helens Green Belt. At the very least, the site should be designated as safeguarded land, for future employment development.

HOUSING STRATEGY

A failure to plan for meeting the objectively assessed need for housing development (Policy LPA05)

The level of uplift proposed to the base housing requirement is insufficient to support the PSLP's economic growth strategy and will not provide sufficient housing to accommodate the employment aspirations of the Borough; The PSLP underestimates the level of employment which can be created through the proposed employment allocations, which themselves should be increased in number (see section above on Employment Strategy).

The PSLP relies on increased in-commuting to the Borough and therefore on residential growth outside of St Helens to support its economic growth.

Taking these points together there is a need for the PSLP to plan for the provision of between 600 and 800 residential units per annum, which aligns more closely with the findings of the Draft SHELMA.

The PSLP does not identify a developable housing land supply capable of delivering the identified housing requirement (LPA05.1)

Peel's assessment has identified a number of sites which do not meet the NPPF definition of development or which are unlikely to deliver the number of dwellings assumed.

When taken on a cumulative basis, the developable supply should be reduced by at least 812 dwellings.

This should be mitigated through a 20% flexibility uplift on top of the housing requirement to ensure certainty of delivery and flexibility in the supply as supported by NPPF and the Local Plans Expert Group.

When 20% uplift is added to an increased annual housing requirement, a need to identify land capable of delivering in excess of 3,000 additional dwellings is revealed. This will need to be met exclusively through the release of additional land within the Green Belt.

The spatial distribution of housing sites is at odds with the strategic objectives of the PSLP

The distribution of housing supply does not reflect the stated aspirations of the PSLP nor the distribution proven to be the most sustainable through the Sustainability Appraisal process. There is clear evidence of an overprovision within and on the edge of the St Helens Core Area and an under provision within Haydock/Blackbrook, contrary to the PSLP stated objective to achieve balanced growth. The spatial distribution is wholly unbalanced and does not align with the strategic objectives of the plan in this regard.

Further, contrary to the stated aims of the PSLP, there is

no notable synergy between the distribution of housing and employment sites, as needed to achieve a physical co-location of housing and employment. There is evidence of housing being concentrated in wards which are significantly disconnected from the major concentrations of proposed employment development in the east of the Borough (including Haydock). The distribution of housing (which in this context is more footloose) does not reflect the stated aspirations of the PSLP and the desire for effective integration of housing and employment land to promote sustainable transport patterns.

This arises due to deficiencies in the process of assessing sites for allocation for residential development which has little to no regard to where, within a wider spatial context, each site is located. The spatial distribution of housing sites is a by-product of the site assessment process rather than being informed by it, as should be the case. Distribution should not be approached as an irrelevant consequence of the site selection process rather is a strategic planning end in its own right, which the PSLP should seek to actively influence to ensure the desired spatial strategy is delivered.

A failure to allocate Peel's land at Haydock Green for residential development during the plan period, as an alternative to its allocation for large scale logistics

The site presents a sustainable residential development opportunity, the allocation of which would address a number of deficiencies identified in the PSLP, particular regarding the spatial distribution of residential development, the need for more effective co-location of residential and employment land and the quantitative under allocation of housing land.

The site would deliver significant highways and transport benefits in delivering part of the desired improvement works to Junction 23 of the M6, as a stated objective of the PSLP. The site is unique in this regard.

Peel does not agree with the Council's appraisal of the site through the SA and GBR processes. Peel's adjusted assessment has proven that the site would represent a highly sustainable residential opportunity relative to other sites and that the site makes a very limited contribution to the St Helens Green Belt.

The site should be allocated for residential development during the plan period.

1. Introduction

- 1.1 This Representations Report ("report") has been prepared on behalf of Peel Holdings (Land and Property) Limited ("Peel"). It sets out Peel's representations on the St Helens Local Plan 2020 – 2035 Pre-Submission Draft ("PSLP") with specific regard to the treatment of its land holdings located within the Haydock area of the Borough. It comprises one of three papers which together set out Peel's representations to the PSLP. The remaining papers, which should be read alongside this report are as follow:
- Paper 2: Assessment of housing needs
 - Paper 3: Assessment of housing land supply
- 1.2 Papers 2 and 3 are cross referred to within this paper where relevant.
- 1.3 This representation is made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.
- 1.4 Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:
- Land north east of Junction 23 – c.42ha – being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North (Site Plan at Appendix 1);
 - Land south east of Junction 23 – c.36ha – being promoted for logistics uses in the longer term, known as Haydock Point South (Site Plan at Appendix 1);
 - Land south west of Junction 23 – c.32.4ha – being promoted for housing development in the plan period, or alternatively logistics development in the plan period, known as Haydock Green (Site Plan at Appendix 1).
- 1.5 Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.
- 1.6 Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

- 1.7 The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site¹ for employment uses and the (majority of) the Haydock Green site² for housing.
- 1.8 In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated very little objection.
- 1.9 The PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.
- 1.10 In a complete reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Summary and structure of representations

- 1.11 Peel specifically objects to the PSLP on soundness grounds, in relation to the following:
- The employment land requirement and quantum of employment land proposed for allocation (under Policy LPA04);
 - The housing land requirement and the quantum of housing land proposed for allocation (under Policy LPA05);
 - The designation of land (including the extent of that land) at Haydock Point North as Safeguarded Land (under Policy LPA06) rather than for employment development within the Plan period (under Policy LPA04);
 - The failure to designate Haydock Point South as Safeguarded Land for employment development beyond the Plan period (under Policy LPA06) and its proposed continued designation as Green Belt;
 - The failure to allocate Haydock Green for housing development in the Plan period (under Policy LPA05) or, as a minimum, as Safeguarded Land (under Policy LPA06) for housing development beyond the Plan period.
 - The failure to allocate Haydock Green for employment development in the Plan period (under Policy LPA04) as an alternative to housing development, or, as a

¹ Policy LPA04; Ref EA4

² Policy LPA05; Ref HA10

minimum, as Safeguarded Land (under Policy LPA06) for employment development beyond the Plan period.

- 1.12 The remainder of this report deals with and expands on each of the points made in the Executive Summary, where appropriate referring to topic-specific papers appended to the report. The report concludes with Peel's proposed amendments to the PSLP to make it sound in each respect.

THE PSLP EMPLOYMENT STRATEGY

2. Employment land requirement (Policy LPA04)

Summary:

- The Council has significantly understated the employment land requirement for the Borough.
- In doing so the PSLP fails to accord with the expectations and requirements of national policy, and is internally inconsistent; the stated objectives of the PSLP are not adequately reflected in the policies intended to deliver on those objectives.
- The overall land requirement should be increased to 290 hectares, in order for Policy LPA04 to be sound.

Introduction

- 2.1 Supporting sustainable economic growth is at the heart of national planning policy. The National Planning Policy Framework ('the Framework') recognises the critical role the planning system plays in achieving sustainable development, and identifies economic growth as one of three overarching objectives. Through the preparation of plans and the application of policies in the Framework the planning system is expected 'to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and enhanced productivity'³. A failure to do so risks failing to fulfil this overarching objective and the achievement of sustainable development.
- 2.2 An expansion of this overarching objective makes clear that planning policies should help create favourable economic conditions, and significant weight should be placed on the need to support economic growth and productivity, both in meeting local business needs and wider opportunities for development. Areas should build on their strengths and address the challenges of the future.⁴ In plan-making, authorities should seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change, with strategic policies, as a minimum, providing for objectively assessed needs for all housing and other (and therefore employment) uses.⁵
- 2.3 The expectations and requirements of national policy are clear and the PSLP must conform and respond. As drafted however, the PSLP does not.
- 2.4 The vision and intent of the PSLP is positive and reflects an ambition to drive economic growth and make the most of the Borough's strengths. Amongst its strategic objectives are maximising the contribution of St Helens to the economy of the Liverpool City Region and adjacent areas as well as meeting local employment needs.⁶ However, the

³³ National Planning Policy Framework (MHCLG 2019), paragraph 8

⁴ Ibid, paragraph 80

⁵ Ibid, paragraph 11

⁶ PSLP, Strategic Objective 5.1

policies that follow within the PSLP undermine this objective and fail to respond to the core expectations of national policy.

- 01
- 2.5 At the heart of this is an assessment of employment land needs that significantly understates the needs and potential of the Borough, and a consequential under-provision of land capable of delivering on the PSLP's stated objectives and supporting sustainable economic growth. As this section goes on to demonstrate, Policy LPA04 of the PSLP is unsound as drafted and requires notable alteration, with consequential effects on other policies of the Plan (which following sections of this report address).
- 01

Objectively Assessed Needs

- 2.6 The substance of Peel's objection in respect of Policy LPA04 is expressed and evidenced in the Employment Land OAN Report provided at Appendix 2. This has been prepared by Turley, informed by specialist input from Amion (economics) and CBRE (market).
- 2.7 The Employment Land OAN Report provides a critical review of the Council's method and assumptions in deriving its objectively assessed need figure for employment land, and in turn the Council's employment land requirement specified in Policy LPA04. It does so with particular attention paid to a dimension of the employment land market, namely logistics. The Council's evidence base and the PSLP explicitly recognise the significant component of the employment land market that this represents, and the major role that St Helens can play in accommodating market demand given its locational and infrastructure advantages. Given this, it has a notable influence on the OAN for employment land and the Plan's response to this need.
- 2.8 The principal findings of the Employment Land OAN Report, which address the deficiencies of the Council's approach and identify a more appropriate approach in view of the PSLP's stated objectives and the expectations of national policy, are summarised below.

Past take-up as an indicator of baseline 'need'

- 2.9 Whilst the principle of having regard to past take-up levels in forward forecasting needs is reasonable, the Council's selection of an extended period of 1997-2012 in identifying a baseline annual average serves to understate those needs.
- 01
- 2.10 It fails to recognise the constraining effect of insufficient suitable employment land during this period. The Employment Land OAN Report highlights the Council's own concession that employment land has served as a constraint to development over extended periods during the selected timeframe. By rolling forward an annual average take-up which was deflated by land supply, the Council is simply perpetuating past deficiencies.
- 01
- 2.11 It involves the selection of a period which is not representative of the elevated levels of activity in the logistics sector now being experienced. The evidence in the Employment Land OAN Report shows the logistics sector has been a key driver of employment growth over an extended period in St Helens, but with particularly strong growth over the period from 1998-2008. The Council's evidence recognises that it is the most likely sector to drive growth in St Helens in the years to come. It is far more appropriate to base the employment land need on the 1998-2008 scenario period, when economic

trends better reflected the positive growth strategy which the Plan purports to establish.

- 01
- 2.12 This is particularly the case given the dramatic and ongoing changes in the logistics market. The Employment Land OAN Report, by reference to CBRE evidence, identifies that especially due to the growth of the online retail market, the demand for logistics space has increased markedly over time and the average size of buildings has grown alongside this. The demand for land is greater, and in substantially larger parcels. This trend is being sustained and can be expected to continue. The evidence of past take-up, particularly in St Helens where the supply has rarely catered for such needs, must be treated carefully as an indicator of future needs. 01
- 2.13 Where boroughs and locations have catered for this need the take-up of land has been much greater. Warrington borough being one such example, and a relevant one given its proximity and comparable relationship with both the Greater Manchester and Merseyside conurbations and the motorway network. Indeed when St Helens has catered for this need the take-up has more than kept pace; this has been evidenced as recently as the last 12 months where planning permissions have been granted for large-scale logistics in advance of the adoption of the Plan and development is already taking place. In a location such as St Helens, where all the evidence (includes the Council's) confirms its appeal to this sector of the employment market, the supply of sufficient suitable land will have a direct correlation with take-up as the demand is so strong.
- 2.14 The degree to which the demand is being met within the North West region is also a key influencing factor. CBRE's evidence (appended to the Employment Land OAN Report provided at Appendix 2) demonstrates the limited remaining supply capable of catering for the growing demand for large scale, highly accessible sites, such that St Helens is capable of delivering.
- 2.15 Taking these factors in to account, and reflecting on the both the emphasis in national policy and the PSLP's stated objectives of sustaining economic growth, the Employment Land OAN Report firmly concludes that the average take-up rate over the period 1998 – 2008 of 7.5ha per annum (a scenario recognised by the Council's own evidence base) is a more appropriate basis to forecast minimum 'baseline' employment needs.
- 2.16 In reflecting this over the same OAN period, the Council considers, 2012 – 2037, and building in the 5 year 'buffer' that the Council rightly recognises is appropriate to provide choice and flexibility, this equates to a base need for 225 hectares over the plan period.

Other factors in establishing need

- 02
- 2.17 On top of the 'rolling forward' of past take-up trends, the Council's approach to establishing the OAN takes into account and makes a further allowance, of 65 hectares, for the effect of major project investment, specifically the influences on demand arising from SuperPort and the Parkside Strategic Rail Freight Interchange ('SRFI'). This 'uplift' is increased from 40 hectares as included for within the POLP OAN figure. Policy LPA04 02

02 2.18 The principle of such an uplift is appropriate, but the scale of the uplift is considered to be arbitrary and insufficient. As the Employment Land OAN Report identifies and explains, there is clear justification for a more notable uplift, more reflective of the influence such major infrastructure investment projects are likely to have, the appeal of St Helens to the increasingly active large scale logistics market and the role it can and is expected to play in meeting growing sub-regional needs. 02

2.19 The evidence presented in the Employment Land OAN Report makes the case for an uplift of 80 hectares compared to the 65 hectares proposed in the PSLP.

Overall OAN

2.20 Taken together, the two principal factors contributing to the OAN figure, generate a need figure of 304 hectares for 2012 – 2037, as summarised in the table below:

Table 2.1: Employment Land Needs 2012-2037

	Ha
Baseline employment Land Needs – based on Growth Period 1998-2008 BE	225
Group scenario – plus 5 year buffer	
Additional land demand major projects	80 ⁷
Total Employment Land Needs	304

Source: Turley

2.21 This represents an uplift of 66 hectares when compared to the upper end of the OAN range identified within the Council's evidence of 239 hectares, being the figure that underpins Policy LPA04. 02

Requirement and Residual Requirement

02 2.22 The OAN identified within the Council's evidence for the period 2012-2037 is adjusted within the PSLP to the end date of the Plan (2035). To make a commensurate adjustment to the amended OAN figure advised above generates a total employment land requirement for 2012-35 of 290 hectares. This compares to the PSLP figure of 227.4 hectares, as shown in the table below:

⁷ Existing allowance of 65ha plus an additional 15ha

Table 2.2: PSLP Employment Land Requirement 2012-2035

PSLP	Ha	Revised ONA	Ha
Baseline employment Land Needs – based on 1997-2012 scenario	133.4	Baseline employment Land Needs – based on Growth Period 1998-2008	172.5
5 year buffer	29	5 year buffer	37.5
Allowance for SuperPort and Parkside SFRI	65	Allowance for major projects and increasing logistics market demand	80
Total Employment Land Needs	227.4	Total Employment Land Needs	290

Source: PSLP Table 4.3 and Turley Analysis

- 2.23 Using the above, the PSLP establishes a residual requirement for employment land that must be provided for within the Plan. This is based on the period from 2018 to 2035 and takes in account:

- take up of employment land since 2012 to the end of the last monitoring period (31st March 2018) – equivalent to 2.7ha; and
- the existing supply of developable employment land – equivalent to 9.3ha.

- 2.24 The approach is replicated in the table below, again showing the comparison between the PSLP derived residual employment land requirement with that established by Turley using the same methodology.

Table 2.3: PSLP Residual Employment Land Requirement 2018-2035

PSLP OAN	Ha	Revised OAN	Ha
A. Total Employment Land Needs 2012-2035	227.4	A. Total Employment Land Needs 2012-2035	290
B. Take up between 1 April 2012 and 31 March 2018	2.7	B. Take up between 1 April 2012 and 31 March 2018	2.7
C. Existing supply of Developable Employment Land	9.3	C. Existing supply of Developable Employment Land	9.3
Total Employment Land Needs (A-B-C)	215.4	Total Employment Land Needs (A-B-C)	278

Source: PSLP Table 4.4 and Turley Analysis

- 2.25 Taking into account take up between 2012 and 2018 (2.7ha) and the existing supply of developable land (9.3ha) (Table 4.4 of the PSLP), then the total residual requirement (2018-2035) would be 278ha (an increase of 62.6ha from the 215.4ha established in Table 4.4 of the PSLP). This should be reflected in Policy LPA04.

Conclusion

- 02
- 2.26 The Council's OAN for employment land is notably understated, with insufficient regard given to the balance between supply and demand, the constraining effect of insufficient supply in the past, the significantly altered context associated with the continued growth of the logistics sector (and the size of developments that operators require), the influencing effect of major infrastructure investment, and the contribution that St Helens can and should be making to meeting pressing regional and sub-regional demand within this sector. The Council's evidence base and the PSLP highlights the significant opportunity that the sector represents for the borough, and the PSLP commits to maximising the Borough's contribution to the economy of the Liverpool City Region. Yet a cautious and unduly negative approach is adopted. 02
- 2.27 The critique contained within the appended Employment Land OAN Report presents an evidenced alternative, one which is reflective of both national policy and the stated objectives of the PSLP. Policy LPA04 is presently unsound and requires notable amendment, in line with the position summarised above, in order to make it sound. Such an amended approach, which is then reflected elsewhere in Policy LPA04 and related policies of the Plan, will ensure there is a sufficiently responsive supply of employment land to cater for needs and support sustainable economic growth, as required by national policy.

3. Employment Land Supply and Haydock Point North (Policies LPA04; LPA06)

Summary:

- There is a quantitative need to allocate c60 hectares of additional employment land to meet objectively assessed needs and to provide sufficient choice and flexibility.
- There is a particular and pressing need for, and a very significant opportunity to derive benefit from, large scale logistics development. The allocation of additional land should cater for those needs.
- The Haydock Point North site is the most appropriate candidate site in the Borough.
- The decision of the Council to designate the site as safeguarded land rather than allocating the land for development in the plan period, as was proposed in the POLP, is founded on flawed reasoning and in the absence of any material change in evidence.
- Regardless of whether the employment land requirement is increased, the site should nonetheless be allocated for development given its special attributes and alignment with market requirements, the significant benefits that would arise including the opportunity it presents to deliver infrastructure improvements (at Junction 23 of the M6), and the absence of any constraints to delivery.

Introduction

- 3.1 The preceding section demonstrates that the objectively assessed need (2012-35) and the residual employment land requirement (2018-2035) as defined at Policy LPA04 of the PSLP are both significantly understated. In order for the Plan to be sound, Peel would contend the objectively assessed need should be regarded as at least 290 hectares. Acknowledging the adjustments documented at Table 4.4 of the PSLP⁸ the minimum residual employment land requirement for the Plan period should therefore be increased to at least 278 hectares.
- 3.2 This shortfall means that the Plan is not meeting the minimum needs of the borough, and fails to provide a flexible and responsive supply of land. It is incumbent on the Local Planning Authority to help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity⁹. The PSLP fails to respond to this core expectation of national planning policy, as it does other specific

⁸ 2.7ha deduction for take-up between 1 April 2012 and 31 March 2018, and 9.3ha for the 'existing supply of developable land' (31 March 2018)

⁹ National Planning Policy Framework (MHCLG 2019), paragraph 8(a)

03 requirements of national planning policy: to plan positively¹⁰, to place significant weight on the need to support economic growth and productivity, and to address challenges of the future¹¹. In so doing, it also undermines its own stated objectives of maximising the contribution of St Helens to the economy of the Liverpool City Region and adjacent areas as well as meeting local employment needs.¹² 03

- 3.3 In order to address this notable deficiency and obvious inconsistency, and to provide sufficient choice and flexibility over and above meeting the minimum needs, the Plan must allocate additional employment land.
- 3.4 Haydock Point North (site plan provided at Appendix 1) is the most suitable candidate site to fulfil those requirements and should be allocated as a strategic employment site for development within the plan period (under Policy LPA04), rather than designated as safeguarded land as presently proposed in the PSLP (under Policy LPA06). Full details of the potential of the site, its capacity and its suitability for development can be found in the documents comprising and supporting the current planning application.
- 3.5 The site should be allocated for development in the plan period regardless of whether any adjustment is made to the employment land requirement. The reasons for not doing so, as documented within the Council's evidence base, are flawed, and the consequences for not doing so are significant.
- 3.6 This section proceeds to demonstrate the following:
- Additional land, in the order of 60 hectares, needs to be allocated for employment development;
 - There are no substantive reasons for deferring the development of the Haydock Point North site to beyond the plan period;
 - The site has special attributes which distinguish it from alternative sites. The site is highly attractive to the large scale logistics market, and significant benefits would arise from its allocation and development. There is strong developer interest in bringing the land forward.
 - The site is eminently suitable for development, and deliverable in the short term.
- 03

- 3.7 We deal with each in turn. 03

The need for additional allocations

- 3.8 As summarised above and addressed in Section 2, the OAN for employment land has been understated, and the residual requirement should be 278 hectares (minimum) rather than 215.4 hectares.
- 3.9 The PSLP proposes the allocation of land comprising (indicatively) 265.3 hectares under Policy LPA04 (Table 4.1) to fulfil its stated minimum requirement, being 49.9 hectares

¹⁰ Ibid , paragraph 16(b)

¹¹ Ibid , paragraph 80

¹² PSLP, Strategic Objective 5.1

03 above the minimum requirement (of 215.4 hectares). This reflects that the Plan needs to allocate a materially greater quantum of land than the minimum residual requirement, to ensure that there is sufficient choice and flexibility and that potential non- or under-delivery is catered for. This is an entirely appropriate response by the Council, consistent with national policy. 03

- 3.10 However, as the minimum residual requirement is increased, as is contended is necessary, the identified supply needs to increase commensurately. The same degree of flexibility must be retained. Therefore, with an amended residual minimum requirement of 278 hectares (as justified in Section 2) a need arises, including for necessary flexibility, to allocate in the order of 328 hectares (278 hectares plus a c.50 hectare flexibility allowance, consistent with the allowance in the PSLP). This equates to a need to allocate an additional 62.7 hectares, or c60 hectares on a rounded basis.
- 3.11 As the PSLP and its evidence base already recognises, the OAN for employment land is influenced by the need (and opportunity) to cater for logistics. The amended alternative OAN figure that is set out in Section 2 is also strongly influenced by this market sector. Therefore, the additional supply that has to be identified, or at least a very significant proportion of it, must respond to this specific need. In order to be sound Policy LPA04 should allocate c60 hectares of additional land capable of catering for large scale logistics need.
- 3.12 The Haydock Point North site is the most suitable candidate site for allocation.

Flawed justification for deferral beyond the plan period

- 3.13 Within the POLP the Haydock Point North site¹³ was proposed to be allocated for employment development during the plan period. The Council recognised its strategic location and special attributes, and its ability to accommodate the specific and growing demand for large scale logistics development. It was informed by the ELNS (2015) which stated:

03 *'The largest component of employment land growth is anticipated to be in the B8 Storage and Distribution sector. This is expected to be led by the large scale operators (greater than 200,000 sq ft/19,000 sq m). In planning for the locations of such land, the likely land sizes, it should be understood that about 60-70 percent of this land growth is likely to be taken by the larger operators.'* 03

*The locations of the additional land should build upon the existing employment nodes in St Helens and exploits St Helens' key location advantage – its proximity to the motorway network. In particular logistics operations needs excellent access to the motorway network and **the first preference should be close proximity to a junction accessing the M6.** The second most preferable area for major logistics access would be near the junction of the M62 and Linkway. An expansion of the Haydock industrial areas would also attract further warehousing and distribution uses. Therefore sites such*

¹³ PSLP Policy LPA04, Site Ref. EA4

03 as the Parkside site, **the available land at Junction 23 of the M6 and Junction 7 of the M62 would be the key sites to secure for logistics purposes** (emphasis added).¹⁴ 03

- 3.14 In proposing the site's allocation, the POLP specified high level site requirements, intended to be addressed as part of the site's development. This included the following:

'Any enhancement work required to M6 Junction 23 to mitigate the impacts from the proposed development and/or safeguard sufficient land for future enhancement works which may be required to Junction 23'.¹⁵

- 3.15 In the context of an emerging policy framework which recognised the growing demand for large scale logistics development, the significant role that St Helens should play in accommodating this demand, and explicit support for the development of the Haydock Point North site, the Council encouraged Peel to make a planning application for the development of the site. A planning application was duly made for c.1.8m square feet of logistics development in March 2017. At the time of writing the application remains to be determined, but the majority of issues have been resolved.
- 3.16 At this stage of the Local Plan process, the Council both accepted the specific and special attributes of Haydock Point North site and the valuable contribution it could make, and encouraged Peel to advance proposals for its development.
- 3.17 The Council has now altered its position, instead proposing the site as safeguarded land under Policy LPA06. The PSLP still proposes the release of the site from the Green Belt, and therefore the Council accepts that exceptional circumstances exist to amend the Green Belt boundary in this location for the purposes of meeting future employment needs. The basis for this is addressed within the PSLP and the Green Belt Review (December 2018) ('GBR'), where:
- The exceptional circumstances that justify Green Belt review to accommodate both housing and employment needs (both within the plan period and beyond, in order to ensure boundaries endure) are summarised in Section 1 of the GBR and in the Reasoned Justification to Policies LPA02 and LPA06 of the PSLP;
 - The reasons for amending the Green Belt and designating the land encompassing Haydock Point North as safeguarded land are addressed at Section 4 (paragraph 4.5), Section 5 (page 47) and Appendix C (page 256) of the GBR.
- 03 3.18 For the reasons set out below and in the following section of this report, the exceptional circumstances to justify the release of the site from the Green Belt are considered robust, and Peel is supportive of that decision. 03
- 3.19 The only significant difference between the Council and Peel therefore, is one of timing: whether the site should be developed within the plan period, or beyond the plan period. However, the reasons behind the Council's change of stance, for not

¹⁴ ELNS Para. 9.6 – 9.8

¹⁵ PSLP Policy LPA04.1

03 allocating the site for development within the plan period, are flawed and do not withstand scrutiny. 03

3.20 The Council's reasoning is set out in various documents:

- The officer report to Cabinet which recommended the approval of the PSLP for consultation¹⁶ states:

'A key change compared to the previous Preferred Options consultation proposals relates to land north east of junction 23 of the M6. Whereas the Preferred Options document proposed that this site be allocated for employment development before 2033, it is now proposed that it be removed from the Green Belt but safeguarded to meet potential employment needs after 2035. This change of approach will have the benefit of avoiding narrowing down the options for the development of a scheme to improve junction 23 of the M6. The significant improvement of this junction is identified as a key infrastructure priority within the Plan, which would bring substantial benefits to the Borough and the wider transport network.'

The need for this new approach is also evidenced by the St Helens Council Transport Impact Assessment 2018. This confirms that junction 23 currently experiences queues and delays during peak periods and that this situation is likely to substantially worsen as the Plan period progresses without effective mitigation being undertaken. It is also not considered essential for the land north east of junction 23 to be developed before 2035 to meet evidenced needs for employment development within that period.'

- The GBR concludes:

*'The Council can meet its needs for employment development up to 2035 elsewhere within the Borough with this parcel being allocated. Due to the need to address the severe capacity issues at J23, and the need to avoid constraining the ability to design an appropriate junction layout, the parcel is only suitable for safeguarding to meet potential employment development needs after 2035 (as opposed to allocation for development before 2035).'*¹⁷

- The PSLP states:

03 *'In the case of Site 2ES, the form and extent of any development that may be acceptable in the future is likely to be influenced by its interrelationship with Junction 23 of the M6, where a need for substantial improvements (likely to include enlargement of the junction) to enhance junction capacity within the Plan period has been identified (see Policy LPA07).'*¹⁸ 03

3.21 In summary therefore, the Council's contention and reasons for deferring the development of the Haydock Point North site to beyond the plan period are that:

¹⁶ Cabinet Report 12 December 2018, para. 2.37 -2.38

¹⁷ GBR, Page 48

¹⁸ PSLP, para. 4.24.3

- The highway network is incapable of accommodating the traffic generated by the development;
- The development of the site could prejudice the ability to remodel Junction 23 of the M6;
- The development is not needed in the plan period.

3.22 We address each of these reasons below.

The highway network is incapable of accommodating the traffic generated by the development

- 3.23 The Council's transport evidence in support of the PSLP is principally contained within the Transport Impact Assessment (TIA) prepared by WSP, dated January 2019.
- 3.24 The TIA considers the sites suggested in the POLP (which included the Haydock Point North site) as allocations for the period 2018- 2033, stating that it is not a TIA for the PSLP. However, it informs that the analysis has been used to help inform the selection of sites for the PSLP. The document states that the expected outcome of this work is to provide a **high level assessment** of the potential implications of proposals, with more detailed assessments completed as sites progress through planning.
- 3.25 To assess the highway impact a SATURN model of St Helens authority area has been developed, which also extends along the A580 and the M6 into Wigan. SATURN is a traffic assignment modelling tool which is suited to consider changes in traffic flows over a large area but provides only a **very coarse indication of network operation** at a micro (i.e. junction by junction) level.
- 3.26 The SATURN model considers key junctions, including pertinent to the Haydock Point North site, the A580/ Haydock Lane junction, Penny Lane/ Lodge Lane junction, and M6 Junction 23. The TIA considers a 2033 future year and the following scenarios:
- 2033 Do minimum – "Business as usual" conditions without Local Plan allocations, but including sites with extant consents, SHLAA sites, planned infrastructure schemes on local and strategic network, including M6/ M62 smart motorway proposals and M6 Junction 22 capacity improvements.
 - 2033 Do Something 1 (DS1) – As above plus all POLP sites.
 - 2033 Do Something 2a (DS2a) – As DS1 plus assumed 5% reduction in commuter trips into/ out of St Helens.
 - 2033 Do Something 2b (DS2b) – As DS1 plus 10% capacity improvements on all arms of congested junctions on the Key Route Network, together with large scale changes, which include grade separation of the A580 and M6 Junction 23 (this is described as a commenced feasibility study; however no plans are provided to show the detail of this scheme).
 - 2033 Do Something 2 (DS2)– combines DS2a and 2b

- 03
- 2033 Do Something 2c – As per DS2 plus the introduction of a 40mph speed limit introduced between A580 and A580/ B5202 junction to the west.
- 03

- 3.27 From the scenario test WSP conclude that the overall impact of the POLP sites is likely to be substantially mitigated by a combination of committed infrastructure schemes, changes in travel behaviour and minor improvements at key junctions. The WSP analysis then focusses on 'hotspots' where the predicted volumes of traffic are likely to exceed the capacity of the network. The A580 is identified as such a 'hotspot', and in this context the TIA references a study at Junction 23 which is currently being undertaken by St Helens in conjunction with Wigan Council and Highways England. It is stated that this study will consider a variety of options covering small scale improvements within the current layout to more significant infrastructure enhancements which may involve removing key movements from the junction. The TIA notes that the feasibility study into potential improvements at M6 Junction 23 is on-going at the time of writing. This means that the mitigation modelled is not a fix, and the form is yet to be determined.
- 3.28 The TIA concludes that the upgrade to Junction 23 considered (i.e. introducing a grade separated arrangement) returns its operation to near do minimum levels in the AM peak, and improves operation during the PM peak. The detailed study of the A580 study concludes that all junctions on the corridor are forecast to operate at similar levels, or slightly better, under the DS2 scenario when compared to the 'do minimum'.
- 3.29 In considering the impact of the POLP sites on the strategic road network (including M6 Junction 23) the TIA concludes that the forecast operation under the DS2 scenario is generally similar, or slightly better than the 'do minimum' scenario, demonstrating the committed, or assumed highway improvements largely mitigate for the traffic generation of the POLP sites.
- 3.30 The TIA concludes that the traffic generated by the POLP sites can be substantially mitigated by a combination of committed and emerging highway schemes, in conjunction with modest changes in travel behaviour and low cost improvements at key junctions. The TIA also notes that further consideration be given to the forecast operation of a number of key junctions or corridors, including M6 Junction 23.
- 03
- 3.31 The TIA therefore suggests there are highway improvements available which would mitigate the cumulative traffic impact of the POLP sites, although in some instances details of these schemes are limited, for example no information is provided on the M6 Junction 23 grade separated option that was tested in DS2b.
- 03
- 3.32 The overall outcome of the analysis therefore is that there are capacity issues associated with delivering the POLP sites; that the A580 corridor and Junction 23 specifically would be faced with capacity issues; that significant mitigation is likely to be required to address the issues at Junction 23; but that modelling of such a mitigation solution (albeit one not yet determined) suggests that capacity could be readily created sufficiently to accommodate the POLP sites. Rather than indicate therefore that the POLP sites (including Haydock Point North) cannot be accommodated on the highway network, it actually identifies that subject to mitigation, they can be.

03 3.33 Equally crucially, the TIA does not specifically address the impacts of the Haydock Point North site. It considers the traffic impact of the POLP sites as a whole rather than as single entities; consistent with the coarse modelling approach that has been undertaken. Based upon the TIA it is simply not possible to draw any conclusions as to the specific traffic impact of individual sites within the POLP, and therefore which sites should be taken forward to the PSLP. And yet the Council claims to have relied on this analysis in deciding not to allocate the Haydock Point North site. This is clearly a flawed decision, without sound justification. 03

3.34 It is also important to highlight that in the context of the current planning application for the site, the potential traffic impact of the specific development proposition for Haydock Point North has been comprehensively assessed. There are ongoing discussions with the Council, Wigan Council as adjoining authority and Highways England in order to identify the optimum mitigation solution. However, at no stage has it been determined that the highway network cannot accommodate the traffic associated with the development of the site; it is a matter of agreeing the appropriate approach to mitigation.

The development of the site could prejudice the ability to remodel Junction 23 of the M6;

3.35 It is recognised that the TIA identifies capacity issues associated with Junction 23 of the M6 and the need for mitigation to accommodate development within the POLP (but not limited to the Haydock Point North site). It is further recognised that there is an ongoing study being undertaken by the Council, Wigan Council and Highways England to identify a prospective mitigation solution for Junction 23, and that Policy LPA07 of the PSLP identifies *'improvements to existing motorway capacity and infrastructure with particular priority being given to the M6 Junction 23 and M62 Junction 7'* as one of the measures to achieve its strategic priorities for the transport network. Finally, it is also recognised that the Haydock Point North lies adjacent to Junction 23.

3.36 However, none of this justifies the Council's decision to change its position, in no longer allocating the site for development in the plan period. The Council's decision is wholly undermined by the following considerations:

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- The POLP recognised the relationship between the site and Junction 23 and the likely need for a mitigation solution to enhance capacity of the junction as noted above. The Council nonetheless proposed the allocation of the site in full acknowledgement of that situation.
 - There is no published evidence in support of the PSLP which begins to outline or even consider the form of a prospective mitigation solution for Junction 23. The evidence base simply refers to an ongoing study being commissioned to consider a prospective mitigation solution. There is no scheme defined, no understanding of its potential land-take or integration with the existing network, no assessment of its effects and benefits, no business case assembled, and no funding in place¹⁹. There is no evidential basis to inform the Council's decision not to allocate the
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¹⁹ All acknowledged within the Infrastructure Delivery Plan (para. 3.20).

site on this basis, and therefore no different circumstances than prevailed at the time of the POLP.

- The Council proposes the release of the site from the Green Belt and its designation as safeguarded land, on the basis that it is expected to be needed to meet employment needs beyond the plan period and due to its specific locational and scale advantages (which directly align with the needs of large scale logistics). The Council necessarily therefore acknowledges that the site is capable of being sustainably developed for that envisaged purpose in the future, regardless of what prospective solution is identified for Junction 23. It does not follow that the site's development within the plan period cannot also accommodate such a prospective solution. There is no basis for sterilising the site's development potential until beyond 2035.
- The improvements to Junction 23 are intended to facilitate the economic growth of the borough – the need for improvement is justified by the TIA not on the basis of existing capacity issues but the ability to accommodate the growth identified within the POLP. It is therefore counter-productive to constrain valuable economic development which would be best served by such improvements.
- The decision to delay the development of the Haydock Point North site is claimed to have been made in order to provide flexibility to accommodate a prospective mitigation solution, but the converse consideration is that the development of the site can support the delivery of the prospective solution by the provision of potential land required and/or by financial contribution. Rather than considering the development of the site as a potential constraint the Council should rather consider it as means of actively facilitating the delivery of infrastructure which can have significantly broader benefit, beyond purely mitigating the impact of this specific development. Peel has always been willing to engage with the Council in this regard, and remains so.
- Indeed, following the publication of the PSLP and in the context of the current application on the Haydock Point North site, the Council has shared emerging findings from the Junction 23 study and discussions have been held as to how the development could potentially accommodate and facilitate improvements to the junction. Work is ongoing but there is every indication that a positive solution can be found, which both facilitates the Junction 23 improvements and enables significant logistics development to be realised on the site. Indeed, the information presently available, which comprises information supplied to Peel by the Council in the context of the current planning application, in no way supports the contention that the site's development would prejudice the ability to deliver necessary improvements to Junction 23. Rather, it indicates that the prospective solution could readily be accommodated as part of the development of the site, and indeed requires Peel's land in order to deliver it. The allocation of the site for development is not prejudicial to delivering the desired strategic improvement of Junction 23; to the contrary, it will help the delivery of those improvements in a way that no other site in the borough can achieve. This in

itself contributes to the exceptional circumstances justifying the site's removal from the Green Belt.

The development is not needed in the plan period

3.37 There are a number of reasons why this conclusion is flawed:

- In the preceding section of this report we have demonstrated that the objectively assessed need for employment land and the residual minimum land requirement are significantly understated and that additional land needs to be allocated. This in itself refutes the Council's contention that the development of the site is not needed.
- We address below the particular and special characteristics of the site that distinguish it from alternatives.
- Only once the Council had selected other sites for allocation to meet the residual land requirement did it reach a position where no additional land was considered necessary to meet that requirement. If the selection process up to that point is flawed, whereby the site is discounted for unjustified reasons, as we have shown above, then no weight can be applied to the conclusion that the site is not needed. It simply becomes a self-fulfilling prophecy.
- There are also legitimate questions over the flexibility of the supply that has been identified, specifically in relation to the Parkside East proposed allocation (Policy LPA04.1, Site 7EA; Policy LA10).

3.38 In demonstrating how the allocated sites will meet the minimum employment land requirement, Table 4.1 of the PSLP identifies Parkside East as contributing 64.55 hectares. Footnote 17 explains that Parkside East has a gross area of 124.55 hectares, but the 64.55 hectares is the residual beyond 60 hectares of land which is reserved for development of a Strategic Rail Freight Interchange ('SRFI') or other rail enabled use. The 64.55 hectares may be developed for a wider range of employment uses (i.e. not associated with the SRFI), subject to provisions of Policy LPA10.

3.39 In essence, the PSLP assumes that 60 hectares of Parkside East will be developed for SRFI or other rail enabled use, and due to the special characteristics of that use, does not count it towards meeting general employment land requirements. It is therefore this arbitrary definition of 60 hectares that dictates the 64.55 hectares which is counted towards the general employment land requirement.

3.40 However, the evidential basis of the 60 hectares is unjustified. It is explained at paragraph 4.36.13 of the PSLP that the 60 hectares equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008. Whilst this is not disputed, it nonetheless cannot be a legitimate basis on which to delineate between the SRFI-related and general employment components of the allocation. It pays no regard to need, demand, or anticipated scale.

3.41 It is important to highlight the significance of the Parkside site and the particular role it is intended to play. The Reasoned Justification to Policy LPA10 refers to national and regional policy and extensive evidence which identifies the need for and significant

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benefits arising from rail-based freight facilities and the credentials of Parkside to meet that need. Paragraph 4.36.9 refers to the *Parkside Logistics and Rail Freight Interchange Study* and highlights that Parkside 'is uniquely placed to satisfy this demand' and 'the opportunities for rail access from the site are considered to be second to none in the North West'. Given this apparent uniqueness, one could legitimately expect its market appeal and the demand for space to be significant.

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- 3.42 There is also the matter of the likely scale of development needed to justify the extent of investment required to create an SRFI. Peel has extensive experience in this field, including at Port Salford, the site of a proposed SRFI, and is well aware of the very significant cost of introducing site-specific rail infrastructure (estimated at £50m+ in the case of Port Salford). In order to underpin such investment decisions and be able to secure a return on investment, developers will naturally seek to maximise development which makes use of the infrastructure (i.e. rail-served development). One only needs to consider the size of SRFIs across the UK to identify the scale of development typically associated with this level of investment: for instance DIRFT (Daventry International Rail Freight Terminal) III extends to 345 hectares; the East Midlands Gateway extends to 283 hectares.
- 3.43 In view of its significance as an SRFI opportunity, the arbitrary nature of the 60 hectares identified, and the commercial drivers underpinning infrastructure investment, the likelihood is that in excess of 60 hectares will be developed as SRFI or associated uses. Indeed there is a risk that allowing for other, general employment uses that serve to limit the SRFI to 60 hectares will undermine the significance of the site and its potential contribution to meeting such specific needs. The uniqueness of the site is recognised by the PSLP, but the policy approach doesn't adequately serve to protect this uniqueness.
- 3.44 The inherent risk in respect of the general employment supply is that the 60 hectares is not a cap, but rather an indicative (and indeed likely minimum, on the basis that it is a minimum threshold for NSIPs) size. If the SRFI occupies in excess of 60 hectares (as seems likely) then this will reduce the contribution that the site can make to meeting general employment needs. This will dilute the flexibility of the supply, and increase the risk that the minimum land requirement is not met.
- 3.45 This further highlights the need to build in additional flexibility by increasing the supply through the allocation of the Haydock Point North site, regardless of whether the minimum land requirement is increased as proposed in the preceding section of this report.

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The site has special attributes which distinguish it from alternatives and significant benefits would arise from its allocation and development

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- 3.46 The Council's own evidence and the supplementary evidence that has both informed the current planning application and these representations, summarised in the preceding sections, reveal a significant need and opportunity for new, high quality, large footprint logistics floorspace in St Helens to alleviate the growth of this key sector and maximise its contribution to the local economy. Demand is high and the need is pressing.

03 3.47 Modern logistics demand high quality accessible sites. Key requirements are for large floorplates with flexibility for cross docking capacity, accessible locations on the strategic highway network, including motorway junctions allowing multi-directional movements and connectivity within markets, and proximity to main population centres for speed of delivery. 03

3.48 The Haydock Point North site perfectly aligns with this specific market demand and its particular characteristics are such that it would very likely have greater market appeal of any prospective site in St Helens. Like other sites in St Helens it has the benefit of proximity to the Liverpool and Manchester markets and its accessibility to a local labour market for employment and training opportunities. But it also possesses the following characteristics which set it apart (refer to CBRE report for further confirmation – provided at Appendix 2).

- The site's adjacency to Junction 23 of the M6 allows immediate and full accessibility to the motorway network north and south, and on to the A580 for east and west movement, half way between the Manchester and Merseyside conurbations. Minimising operational costs by locating distribution facilities close to motorway junctions is a key requirement for modern logistical operators. "Prime" sites targeted for Regional Distribution Centres (RDCs), amongst the larger occupational requirements, have a particular need for motorway proximity given their range of coverage. The Haydock Point North site is the most accessible (in road transport terms) site within St Helens, and probably one of the best located in the North West of England.
- The site is very large with few constraining features. This makes it both highly flexible and able to accommodate buildings of significant size. As illustrated within the current planning application, the site is capable of accommodating c1.8 m sq ft of logistics floorspace and importantly this can be formed of building up to 990,000 sq ft. This is highly unusual and offers an opportunity to create a product which is not only unavailable within St Helens but unavailable across the North West region. As the CBRE report (provided at Appendix 2) identifies the size of units which the market demands is increasing, and there is no supply of existing buildings of Grade A specification in excess of 600,000 sq ft in the North West. The site's accessibility, referred to above, further lends itself to attracting the very largest occupiers (RDCs and the like).

03 3.49 The Council has paid insufficient regard to these special features. Nowhere in its site selection process, principally described and justified in the GBR, does the Council specifically address market appeal. The evaluation of "development potential" conducted at Stage 2b of the GBR contains no market evaluation, nor does it consider how the characteristics of sites corresponds with market needs/demand. Despite the assertions that the Plan seeks to maximise its contribution to the Liverpool City Region economy²⁰, and in doing so places a particular focus on accommodating specific demand for large scale logistics²¹, the Council, in the absence of any absolute or comparative evaluation of market appeal, has discounted a site which is uniquely placed to respond to this market demand. 03

²⁰ Strategic objection 5.1

²¹ PSLP Policy LPA02 : Spatial Strategy

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- 3.50 In so doing, the significant benefits associated with developing the site would be deferred until at least 2035, for reasons which are difficult to understand.
- 3.51 The Economic Statement accompanying the current planning application identifies that the development would represent £140.6m of investment in the borough and create the following outcomes:
- Over 250 jobs created during the construction period in a range of occupation and skillsets;
 - Potential to generate £127.5m construction expenditure and with additionality/induced benefits to local supplier and services potential to lead to 344 new jobs with 86 in St Helens and 140 in the local impact area;
 - Between 2,286 and 2,758 FTE equivalent jobs created on site once the development is fully operational – this could include 823 to the Borough and 1114 to the local impact area;
 - A £5.9m uplift annually in productivity – measured in GVA – within the Local Authority economy, with £9.8m generated within the local impact area and £22.8m within the wider impact area;
 - A £58.7m annual contribution to economic productivity within the Local Authority area during the operational phase, with £79.5m generated within the local impact area and £148.7m within the wider impact area; and
 - A £3.5m uplift in business rates revenue and £1.7m to be retained in the borough.
- 3.52 Beyond the social and economic benefits of the development, as noted above the site's development also provides the unique opportunity to improve the operation and capacity of Junction 23. This in itself distinguishes the site from alternatives, including those proposed for allocation, and comprises a very significant benefit of the proposals.
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A suitable and deliverable site

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- 3.53 As noted, the Haydock Point North site was proposed for allocation as a strategic employment site in the POLP, and the Council explicitly encouraged Peel to pursue a planning application for its development. The Council has therefore previously accepted the suitability and deliverability of the site.
- 3.54 The reasons now given by the Council for designating the site as Safeguarded Land rather than allocating for development do not challenge the suitability or deliverability of the site. The only matter that could be deemed to relate to suitability / deliverability would be in respect of highways capacity, but as we have addressed above, this is principally concerned with the need to invest in improvements to Junction 23 of the M6 and the perceived potentially prejudicial effect that the development could have on that solution, rather than suitability *per se*. Indeed, the very fact the Council still proposes the site's removal from the Green Belt to meet longer term employment

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needs, and therefore accepts that there are exceptional circumstances, demonstrates acceptance by the Council of the site's suitability and ultimate deliverability.

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3.55 Nevertheless, there are aspects of the Council's evidence base that question the suitability of the site, and given Peel's contention that the Plan is unsound in the absence of the site's allocation, it is important to reiterate and demonstrate the suitability and deliverability of the site, which we now address.

Location

- 3.56 As addressed in relation to market appeal above, the site is located adjacent to the M6 motorway and A580, with ability to access directly on to the A580 and access to the M6 (both directions) via Junction 23. The site therefore has excellent connections, with the ability to make onward connection to the regional motorway network (M62/M58/M61) and to major urban centres and facilities across the North West, including the Port of Liverpool.
- 3.57 Whilst lying close to the urban areas of Ashton in Makerfield, Newton le Willows, Golborne and in particular Haydock, with the ability to provide accessible employment opportunities for those communities, there is adequate separation from sensitive residential receptors to support large scale industrial uses.

Green Belt

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3.58 The site is evaluated within the GBR as part of a wider land parcel including land to the North West (Parcel ref. GBP_033) which informs many of the conclusions of the assessment against Green Belt purposes. The overall evaluation score attributed to the parcel is 'high'²², i.e. that it makes a high contribution to Green Belt purposes. Against only one of those purposes, purpose 2 – preventing neighbouring towns merging - is the contribution found to be 'high', with recognition of the strong defensible boundaries of the parcel and its strong containment contributing to lower scores against other purposes. Those boundaries are only slightly weakened (in respect of the north western section) when one considers the Haydock Point North itself; there remain strong boundaries around most of the site. The GBR considers that the development of the parcel would likely lead to unrestricted sprawl. However, given the presence of those boundaries, and the definition they can provide over the long term, that assertion is untenable.
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3.59 The principal concern, leading to the 'high' score, is that the development of the parcel would lead to the physical merging of Haydock and Ashton-in-Makerfield and would significantly reduce the scale and integrity of the gap between Haydock and Golborne. Whilst it is accepted there would be a reduction in the gap between Haydock and both Ashton-in-Makerfield and Golborne, the development of the site (as opposed to the assessed parcel) would not lead to the merging of Haydock and Ashton-in-Makerfield and a significant gap would still remain between the expanded area of Haydock and those settlements, contained by defensible boundaries (reinforced as necessary in the north west). We consider therefore that the overall conclusion of 'high' is a product of the methodology applied, and that the contribution of the site (rather than a broader parcel) is overstated, particularly given its level of containment.

Policy LPA06
Green Belt
Reviews

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²² As presented in Appendix C, pages 256-258

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- 3.60 Regardless, in acknowledging the specific need and demand for large scale logistics and the potential of the parcel to meet the size and locational requirements of that market, the parcel was carried through the full GBR assessment and exceptional circumstances were identified to justify its release from the Green Belt. As we set out elsewhere, our only dispute in this regard relates to the timing of when the site may be developed.
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Technical and Environmental Considerations

- 3.61 The GBR summarises the findings of the Sustainability Appraisal ('SA') and a 'development potential' assessment undertaken as part of the GBR in respect of each parcel. Despite reliance being placed upon it, the detail of the 'development potential' assessment is not provided within the evidence base and therefore cannot be scrutinised. Given its absence, no reliance can be placed upon it. Again, the limitations of the assessment in respect of its consideration of parcels as opposed to prospective site allocations should also be noted.

- 3.62 In respect of evaluation against the SA objectives / technical and environmental considerations that are transparently reported in the GBR, we would respond follows:

Would likely have a negative effect on biodiversity

- 3.63 The planning application has been supported by comprehensive ecological surveys and the potential impacts of development of the site assessed. The site is not of high biodiversity value, but a suite of mitigation has been identified to address the impacts expected to arise. That suite of mitigation has been agreed with the Council and Merseyside Environmental Advisory Service (as a statutory consultee) on the basis that it would achieve a net beneficial effect. No objection has been raised to the application by Natural England. This contention is therefore without foundation.

It will likely impact on air quality

- 3.64 In relation to road traffic emissions associated with the proposed development computer modelling of the effect of road traffic during the construction and operation of the development have been completed as part of the planning application. The impacts of both construction traffic associated with the project and traffic associated with the operational phase of the project are considered to be negligible at all assessed receptor locations. No objection has been raised by the Council's Environmental Health department. This contention too is therefore without foundation.

The development would 'potentially have positive effects on the local economy'

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- 3.65 Whilst presented as tentatively positive within the SA, we would note the clear difference in approach when the Council presents sites that are proposed for allocation. For instance, the evaluation summary for Parkside East in the GBR (Parcel ref. GBP_039)23 states more definitively 'development of the parcel would benefit the local economy...' despite the same proximity to an area ranked as being of equivalent deprivation. The planning application has clearly demonstrated the very significant economic benefits that the development at Haydock Point North could have for the local population and has presented a local employment programme to ensure this is realised. This has been inexplicably played down in the SA.
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²³ GBR, page 50

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Substantial landscape buffers would be required to mitigate the visual effects of any employment development

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- 3.66 This would be the case for any large scale employment development bounded by countryside and therefore does not distinguish it from any of the other sites under consideration. The design and layout of the proposed development as comprised within the planning application incorporates planted landscape corridors, which alongside existing woodlands on adjacent land will create a strong landscaped boundary treatment that will help to integrate the site into the local landscape and enhance woodland connectivity. The landscape and visual assessment of the application has shown that there would be no significant residual visual or landscape effects. Therefore, this consideration can be readily accommodated.
- 3.67 In respect of other technical and environmental considerations, the planning application and accompanying Environmental Statement has comprehensively demonstrated that the site and surroundings can readily accommodate the proposed development without significant adverse impacts. Aside from highways matters, where discussions are ongoing as to an appropriate mitigation solution, there are no outstanding objections from statutory consultees.
- 3.68 Given the additional depth of analysis that the application documents comprise relative to evidence that will be inform the consideration of sites through the Local Plan process, there can be the utmost confidence as to the suitability of the site for strategically significant employment development.

Deliverable

- 3.69 The site is within the single ownership of Peel, a willing landowner with a proven track record of delivering high quality, large scale, sustainable logistics development via a variety of means. Peel Logistics Property, a joint venture between Peel Land and Property and Macquarie Capital is presently developing out a number of logistics developments across the UK. The development of the site could be secured through different delivery models, including by Peel Logistics Property, by other development companies or by specific operator tenants. The flexibility of delivery options allied to the location, profile and scale of the site will make it highly attractive to the logistics market. Soft market testing has provided confidence that market demand would be very high for the development of this site. The land exhibits few constraints and with planning certainty, there can be complete confidence that the site will prove deliverable and very likely to be the subject of investment and development in the immediate term.

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Conclusion

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- 3.70 There is a need for at least c60 hectares of additional employment land to be allocated, assuming that all proposed allocations remain within the plan once adopted. The Haydock Point North site is the most suitable candidate site for allocation.
- 3.71 However, regardless of any uplift to the residual land requirement, the Haydock Point North site should be allocated for development during the plan period.

03 3.72 The Council has accepted that there are exceptional circumstances that justify the release of the site from the Green Belt. The only dispute is in relation to timing as to when the site is needed and can be developed.

3.73 The Council's decision to safeguard rather than allocate the site is unsound. It's reasoning is flawed and not supported by robust evidence. The decision is also highly detrimental and inconsistent with the PSLP's stated strategic objectives. 03

3.74 For the PSLP to be sound, the Haydock Point North site should be allocated for development in the plan period under Policy LPA04.

4. Deficiency of Safeguarded Land for employment development (Policy LPA06)

Summary:

- The Council has rightly identified exceptional circumstances justifying the release of Green Belt to provide safeguarded land for employment (and housing) purposes.
- The Council however, has not identified the scale of anticipated future need that such safeguarded land should be capable of accommodating, which risks under-provision and the need to alter Green Belt boundaries at the end of the plan period.
- The Council has underprovided against minimum reasonable timeframes beyond the plan period.
- This is exacerbated when one applies the upward adjustment to the employment land OAN and residual requirement Peel contends is necessary (in Section 2).
- The sites identified as safeguarded land for employment purposes (Policy LPA06) should either be allocated for development within the plan period (Site 2ES) or discounted entirely (Site 1ES). This generates a need for additional safeguarded land regardless of the conclusions reached on overall quantum.

Introduction

- 06
- 4.1 Peel supports the Council's decision to identify safeguarded land to meet potential long term development needs of the borough. The Framework identifies the importance of safeguarded land, to ensure that strategic planning policies have regard to the intended permanence of Green Belt boundaries in the long term.
- 4.2 However, Peel considers that the quantum of land to be safeguarded is currently insufficient to meet the Borough's long term employment development needs and this section will demonstrate why additional safeguarded land for employment purposes should be identified in order to ensure revised Green Belt boundaries endure well beyond the plan period.
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- 4.3 In so doing the section expands on the following key considerations:
- The revised OAN and employment land requirement which we contest in Section 2 is appropriate should dictate that an additional quantum of safeguarded land is identified, to reasonably meet long term development needs beyond the plan period.

Policy LPA06
Site 2ES

- As addressed in Section 3, Peel supports the release of land north east of Junction 23, M6 (Haydock Point North), from the Green Belt; however this land should be allocated to meet employment development needs over the plan period (within emerging Policy LPA04). In such circumstances, there is a need to identify additional safeguarded land to 'replace' that presently assumed to be provided for by Haydock Point North.
- It is reasonable to expect that the proposed safeguarded land adjoining Omega (Junction 8, M62 Site 1ES) will ultimately cater for Warrington's employment needs rather than St Helens'. It should not therefore be counted as contributing to meeting St Helens' long term development needs, and alternative provision should be made.
- Land south east of Junction 23, M6 (Haydock Point South), should be removed from the Green Belt and identified as safeguarded land to meet future employment requirements (within emerging Policy LPA06).

Site 2ES: Land North East of Junction 23, M6 – Designation and Site Boundary

- 4.4 Before addressing the matters listed, we would emphasise that Peel is supportive of the release of land at Haydock Point North from the Green Belt, but object to its designation as safeguarded land rather than development in the plan period, as addressed in Section 3. In addition, Peel objects to the boundary of the proposed designation under Policy LPA06.
- 4.5 Consistent with previous representations, Peel contends that the site boundary for the 'Land North East of Junction 23, M6' (ref. 2ES) should be amended so that it includes additional land at the eastern end of the site. The extended boundary would take the designation up to the line of existing woodland plantations that surround the site in this area, which will form a strong and defensible boundary, and therefore an appropriate revised Green Belt boundary. The Council's Green Belt Review included this land in its parcel GBP_033, and concluded that there were strong boundaries and containment. At present, the allocation boundary line is arbitrary and does not follow a defined or defensible route; the revised boundary sought for the allocation is provided at Appendix 1.
- 4.6 Peel makes no comment on the designation of land within Policy LPA06 beyond the Haydock Point North site (and beyond its land interests).

Planning Policy and Precedents

- 4.7 The Framework sets out the Government's national planning policy relating to Green Belts. Paragraph 136 provides specific guidance on safeguarded land, which states:
*"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**."* [our emphasis added]
- 4.8 Paragraph 139 of The Framework states that when defining Green Belt boundaries, plans should:

06 "...c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching **well-beyond** the plan period; [our emphasis added]

d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

e) **be able to demonstrate** that Green Belt boundaries **will not need to be altered at the end of the plan period...**" [our emphasis added]

- 4.9 The last bullet point in paragraph 139 represents a notable change from the previous version of the Framework (2012) where in this respect it required local planning authorities to '**Satisfy themselves** that Green Belt boundaries will not need to be altered at the end of the development plan period'. The requirement for local authorities to now '**Be able to demonstrate**' that this will occur raises the significance of the issue and places a greater duty on local authorities to address the issue in preparing their plans and when revising Green Belt boundaries.
- 4.10 The Planning Practice Guidance (PPG) does not provide any further guidance in relation to safeguarded land and there is no standardised methodology or guidance to establish what '**well-beyond the plan period**' means for identifying the quantum of safeguarded land that is required in new Local Plans.
- 4.11 Given there is an absence of available guidance on this matter, it is appropriate to review other Local Plans and their examinations. A summary is therefore provided below, of where safeguarded land has been considered and what quantum of safeguarded land has been suggested as 'reasonable'. As the principle of safeguarded land is to ensure that Green Belt boundaries endure beyond the plan period, regardless of the use it is intended to put to, the examples provided below (which relate to housing needs) are equally applicable to employment needs:
- The Cheshire East Council Local Plan Strategy designated safeguarded land in order to ensure it did not need to amend its Green Belt boundaries until 2045 (15 years beyond the plan period end date of 2030). This time period was selected because 15 years is the usual 'minimum time period' for the life of a Local Plan.

06 At the Examination, the Inspector provided the following commentary on this methodology:

06 "There is little guidance available on defining the appropriate amount of safeguarded land, but after considering best practice, **an approach which considers a 10-15-year period beyond the end of the current plan period seems reasonable** in the context of Cheshire East; it strikes a reasonable balance between avoiding the need to review the Green Belt at the end of the current

plan period and avoiding unnecessary releases of Green Belt land at this time"²⁴.
[our emphasis added]

- As part of the preparation of the emerging City of York Local Plan, the Council sought a legal opinion on safeguarded land and reported it at an internal Local Plan Working Group.²⁵ This Opinion (by John Hobson QC) highlights key points for defining a safeguarded land requirement:
 - It clarifies that the duration of longer term development needs, stretching well beyond the Plan period, is a ***"matter of planning judgement, but... a 10 year horizon beyond the life of the Plan... would be appropriate"***. This should be seen in the context that York is currently preparing a Plan for a 16 year period. [our emphasis added]
 - It emphasises the importance of such land being *"genuinely available and capable of development when needed"*, which links the process of identifying safeguarded land specifically to the site selection process.

4.12 It is acknowledged that there are cases where local planning authorities have not released Green Belt land for safeguarding purposes, when amending Green Belt boundaries. However, those were prior to the more stringent requirement imposed by paragraph 139 of the Framework.

4.13 Emerging Local Plans therefore need to provide sufficient evidence to demonstrate that Green Belt boundaries will endure, taking in to account anticipated future development needs, with precedents showing the period of 10 years beyond the plan period has been recognised as a reasonable minimum requirement.

Proposed Quantum of Safeguarded Land

4.14 The Council has rightly accepted that safeguarded land should be identified to accommodate future employment (and housing) needs in order for Green Belt boundaries to endure. It does so given the Borough's identified employment growth and development needs, the limited capacity of urban land to accommodate development needs, and the requirement to amend Green Belt boundaries to deliver development within the plan period. Given the constraints that those Green Belt boundaries would present to accommodating future development needs, including the specific large scale logistics need that the Council has evidenced, the Council has recognised (and demonstrated) that exceptional circumstances exist to make further adjustment to the boundaries to provide permanence.

4.15 Peel supports the Council's commitment to addressing this issue. However, to date the Council has not defined or evidenced what anticipated needs or timescales (in terms of years beyond the plan period) they are seeking to accommodate to ensure there is sufficient safeguarded land. By failing to establish this, the Council risks compromising its intention to maintain the amended Green Belt boundaries well beyond the plan period, and does not satisfy the requirements of the Framework (paragraph 139).

²⁴ Inspector's Further Interim Views on the Additional Evidence, paragraph 50

²⁵ <http://democracy.york.gov.uk/documents/s95549/Annex%20B.pdf>

- 06
- 4.16 The PSLP currently proposes to safeguard 85.88 hectares of land for employment purposes. This compares to the OAN / overall employment land requirement in the PSLP for the period 2012 – 35 of 227.4 hectares, which averages at 9.89 hectares per annum. 85.88 hectares therefore equates to 8.68 years of the average annual OAN figure; the PSLP is effectively planning for 8.68 years beyond the plan period.
- 06
- 4.17 In light of what the Framework requires and the precedents referred to, Peel contends that the PSLP needs to increase the quantum of safeguarded land that is being proposed for employment purposes, to ensure that Green Belt boundaries endure, equivalent to a minimum of 10 years beyond the plan period, but acting positively and to give greater assurance of permanence, preferably 15 years, as identified in the table below.

Table 4.1: Safeguarded Land Scenarios

Scenarios	Safeguarded Land Requirement (ha)	Safeguarded Land Requirement Against PSLP (85.88 ha) (ha)
10 Years Requirement		
	98.9	- 13.02
15 Years Requirement		
	148.35	- 62.47

- 4.18 Table 4.1 is based on the Council's current OAN and employment land requirement figures and as per the preceding sections of this report, Peel considers that in order for the Plan to be sound, the OAN should be regarded as at least 290 hectares and the residual employment land requirement for the plan period should therefore be increased to at least 278 hectares.
- 4.19 Based on this contention and an uplift of the OAN / overall employment land requirement, this would generate an equivalent need to accommodate the following through safeguarded land for future employment development (compared to the 85.88 hectares presently proposed):
- 10 Years beyond the plan period: 126.10 hectares²⁶
 - 15 Years beyond the plan period: 189.15 hectares
- 06
- 4.20 The above quantum of safeguarded land would ensure the Council can demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period, in accordance with Paragraph 139 of the Framework.
- 06

²⁶ Calculated: 290 hectares (Peel's proposed OAN) over 2012-2035, equates to 12.61 hectares per annum. Multiplied by 10 years, and then 15 years.

The Suitability of Identified Safeguarded Land

- 07
- 4.21 The need for the PSLP to allocate additional safeguarded land for employment purposes also arises from the fact that those sites presently identified under Policy LPA06 should be not be designated as such.
- 07

Junction 23, M6 at Haydock – Haydock Point North

- 4.22 Exceptional circumstances have been demonstrated to justify why Haydock Point North should be removed from the Green Belt. Previous sections of this report have further justified why the site should be allocated as a Strategic Employment site (rather than safeguarded), to deliver development within the plan period.
- 4.23 To allocate Haydock Point North as a Strategic Employment Site would reduce the quantum of safeguarded land within the PSLP by c. 42 ha. Accordingly, the Council would need to identify an additional 55.35 ha to meet the requirement for 10 years beyond the plan period, or 104.47ha to address needs 15 years beyond the plan period (Table 5.1 figures, with the addition of 42ha.).
- 4.24 This requirement would further increase in view of the revised OAN and employment requirement figures which Peel contends; set out as follows:
- 10 Years beyond the plan period: an additional 82.22 hectares to meet the 126.10 hectares figure
 - 15 Years beyond the plan period: an additional 145.27 hectares to meet the 189.15 hectares figure.

Junction 8, M62 at Omega

- 4.25 Omega is a highly successful employment development located within the administrative boundaries of Warrington Borough Council's (WBC), adjoining the urban areas of Warrington. The site is accessed via Junction 8 of the M62 motorway.
- 4.26 The PSLP proposes allocation of 31.22 ha of land to the south west of Omega (Site Ref. 1EA) in order to meet WBC employment land needs, within the St Helens Local Plan period; a further 29.98 ha of land to the north west of Omega has also been identified to be safeguarded to meet St Helens' employment needs beyond the plan period (Site Ref. 1ES).
- 07
- 4.27 Peel finds it difficult to accept that there is a meaningful distinction between the two land parcels in respect of the development needs that they would address. Site 1ES will adjoin the existing Omega development, which is functionally and spatially integrated with Warrington. It is entirely separate from St Helens' urban areas and populace. Whilst residents of St Helens may ultimately be employed in such a development, just in the way they may be by the existing Omega development given its sub-regional scale, the development would inevitably principally function as a Warrington development. It is misleading and inappropriate therefore to treat Site 1ES as contributing to meeting St Helens future employment needs.
- 07

- 07
- 4.28 The site should be discounted and de-allocated unless it required to accommodate the future needs of Warrington borough; we understand that WBC have not made representations seeking its designation on this basis.
- 4.29 This would consequently further increase the requirement to identify additional safeguarded land to ensure the proposed Green Belt boundaries endure well beyond the plan period (c. 10 – 15 years beyond).
- 4.30 In addition to the fact that Site 1ES would realistically contribute to Warrington's future needs rather than St Helens', Peel object to the selection of the site ahead of Land to the South East of Junction 23 (Haydock Point South). We address below and in the following section the suitability of the Haydock Point South, and challenge the Council's evidence in this regard, but simply put, Site 1ES would not be as well related to nor convey the same benefits for the populace of St Helens as the Haydock Point South site.
- 07

Junction 23, M6 at Haydock – Haydock Point South

- 4.31 Haydock Point South comprises c. 36 ha of land within Peel's land ownership. The site is located in a highly accessible strategic location, on the M6 corridor at the interchange with the A580 East Lancs Road, with good connections to the wider regional market. It lies very close to Haydock, which is recognised as the *'forefront of the large warehousing market in the region'*²⁷.
- 4.32 Peel objects to the failure of the PSLP (Policy LPA06) to designate Haydock Point South as safeguarded land to meet future employment needs. Additional safeguarded land needs to be identified to ensure that the Local Plan meets longer-term development needs stretching well beyond the plan period and the Haydock Point South is eminently suitable to meet this need. Furthermore, as stated above, regardless of the contention with regard to the need for additional safeguarded land, the site is better related to St Helens than Site 1ES and should be designated in its stead.
- 4.33 The following section will demonstrate why the c. 36 ha of land at Haydock Point South should be removed from the Green Belt to meet the long term large scale logistics/ employment development needs of the borough.

Conclusion

- 07
- 4.34 Peel supports the designation of safeguarded land in the PSLP, but challenges the quantum of safeguarded land that is provided for. It also challenges specific site designations and this in turn increases the deficiency in provision. The Council has not sufficiently demonstrated that Green Belt boundaries will endure well beyond the plan period, as required by national policy.
- 07
- 4.35 Additional suitable, available and strategically accessible land needs to be identified as safeguarded land, in order to meet the longer-term logistics/ employment needs of St Helens. The following section therefore demonstrates the suitability of Haydock Point South to address this deficiency and indeed to contribute as an alternative to land presently proposed within the PSLP.

²⁷ Employment Land Needs Study (Addendum Report, 2019), BE Group, Paragraph 2.7

5. Haydock Point South

Summary

- The Haydock Point South site should be designated as safeguarded land to meet employment needs beyond the plan period.
- The site has been unreasonably evaluated within the Council's evidence and site selection process.
- The site represents a highly credible alternative / additional site given its suitability, availability, and market appeal.

Introduction

- 5.1 The preceding sections have identified the requirement for additional safeguarded land to be designated to meet the longer term needs for employment development, and made the contention that Haydock Point South should be designated to address this deficiency. The contention is also made that regardless of any change to the quantum of safeguarded land, Haydock Point South represents a more suitable site for designation than Site 1ES of Policy LPA06.
- 5.2 Haydock Point South comprises c. 36 ha of land, positioned in a strategic location, adjacent to the south east of Junction 23, M6 (Site plan at Appendix 1). The site is entirely within Peel's land ownership and is available for future development.
- 5.3 Peel has previously promoted the development potential for Haydock Point South, in response to the St Helens Local Plan Scoping Consultation (March 2016) and the Preferred Options Local Plan Consultation (January 2017).
- 5.4 The evidence base in support of the emerging PSLP has appraised Haydock Point South as part of a wider parcel of land that comprises c. 73.57 ha, positioned to the south east of Junction 23, M6. Peel owns approximately half of the parcel of land that has been appraised (49%) and this represents a well-defined development site opportunity. The following sub-sections of this report appraise this available land, solely within Peel's ownership, demonstrating its suitability to be safeguarded within the emerging Local Plan. In doing so, information is drawn from a Site Prospectus for the site (February 2016, Appendix 3), which was submitted to the Council in relation to the POLP. This document has not since been updated but the findings remain relevant.

Sustainability Appraisal

- 5.5 The Sustainability Appraisal (SA) (January 2019) has assessed 73.57 ha of land south of A580 East Lancashire Road and south east of Junction 23, M6 (Aecom Site ID 33(E4)).
- 5.6 The following table presents an adjusted appraisal of the the land at Haydock Point South as an individual parcel of land, against the SA Objectives that are considered applicable to employment sites.

Table 5.1: Adjusted Sustainability Appraisal of Haydock Point North

SA Objective	Council's SA Score	Peel's commentary and justification for any amendment	Peel adjusted score
SA1 Biodiversity		Preliminary ecological surveys indicate that there are no ecological constraints that cannot be mitigated within future development proposals. Peel therefore believes that Haydock Point South will not have a negative impact on local biodiversity and as such should score Amber within the SA.	
SA2 Land Quality		The site comprises Grade 3 ('good to moderate') agricultural land. A Phase 1 Desk Study and Preliminary Ground Conditions Risk Assessment concluded that there are no ground conditions matters that would limit the development potential of the site and as such should score Amber within the SA.	
SA3 Air Quality		Based on the technical studies that were undertaken in support of the planning application for Haydock Point North, Peel consider it highly likely that any air quality impact can be mitigated and as such should score Amber within the SA.	
SA4 Sustainable Water Resources		As the site comprises undeveloped land, no water supply is available to the land; however a supply serves the residential care unit and cottages. The detailed scheme design stages will consider further supply requirements and as such the site should score Green within the SA.	
SA5 Climate Change		A Sustainable Drainage System can be provided for environmental and ecological enhancements, and to ensure the risk of surface water flooding is not increased. The site proposals will also incorporate green infrastructure which would act as a natural source of cooling. The design of buildings could also incorporate climate resilient features such as shading and natural ventilation.	
SA6 Flooding		Haydock Point South is located in Flood Zone 1 on the Environment Agency Flood Map and is not at risk of flooding and as such should score Grey within the SA.	

SA Objective	Council's SA Score	Peel's commentary and justification for any amendment	Peel adjusted score
SA7a Landscape Sensitivity		Based on the supporting technical information, the site has potential to accommodate large buildings which would be compatible with the scale of the landscape. Further planting can soften the views of future development along the A580 and M6 motorway.	
SA7b Distances to Ridgeline		The SA concludes that the site is 3,707m from the nearest prominent ridge.	
SA8 Cultural Heritage		There are no designated heritage assets within the site boundaries. The supporting technical work has appraised designated and non-designated assets within 1km of the site and concludes that due to separation distances and intervening uses, development of Haydock Point South will not affect the setting of nearby designated heritage assets and as such should score Grey within the SA.	
SA15 Support the economy and foster balanced economic growth		Peel concurs with the SA which acknowledges the site is less than 1km from the M6 motorway/ A580 junction, town centre or retail park.	
SA17 Reduce poverty and social exclusion		Peel concurs with the SA which states that the employment site is located within 1km of 20% most deprived areas of the UK.	
SA19 Reduce the need to travel		Peel concurs with the SA which establishes that the site is within 564m of a bus stop with a high frequency service.	

5.7 As demonstrated above, when Haydock Point South is appraised on an individual basis, the site scores well against the SA Objectives, with no negative impacts likely to be generated following development of the site. The development of the site is likely to promote positive effects in relation to sustainable water resources, climate change, local economy, poverty and social exclusion, and reducing the need to travel.

5.8 The SA provides the following rationale for discarding the wider parcel of land to the south east of Junction 23 of the M6 motorway from the emerging Local Plan:

*"Not all of the site is **available**. There are **access issues** with nearby Junction 23 of the M6 which is known to have capacity issues. The site also contains **protected woodland and individual trees**. There is also a **sensitive use** within the site that would require a significant buffer. Allocation would require a large site to be released from the Green Belt when only a **proportion is suitable for development**". [our emphasis]*

- 08
- 5.9 With regard to the boundaries of Haydock Point South, rather than the wider land parcel the Council appraises, each of these points are address in turn.
- 08

Land Availability

- 5.10 Peel owns the entire site at Haydock Point South and confirms that the land is available to meet the Borough's longer term employment development needs. This claimed restriction is therefore simply not understood.

Access and Highways

- 5.11 As previously explained within the previous sections of this report, there is an ongoing Transport Study being undertaken by the Council, Wigan Council and Highways England to identify a prospective mitigation solution for Junction 23 of the M6.
- 5.12 From the work undertaken to date, a positive solution is expected, which will enable Junction 23 improvements alongside the delivery of significant logistics development around Haydock Point. As a solution has not yet been identified, the mitigation solution can be designed to support the delivery of development on the proposed safeguarded land at Haydock Point South.
- 5.13 Ultimately, the delivery of development at Haydock Point can support the prospective mitigation solution by the provision of potential land required and/or by financial contribution. Peel therefore contends that the capacity issues at Junction 23 should not constrain development at Haydock Point, including Haydock Point South.

Protected Woodland and Trees

- 5.14 A Phase 1 Habitat Survey and Tree Survey has been undertaken to record habitat types, likely presence of protected species, tree quality and to identify any ecological/ arboricultural constraints to development.
- 5.15 The findings show that the land comprises largely arable fields that are of low ecological value. Blocks of mature plantation woodland which include some veteran trees, streams, ponds and hedgerows are present on the site and around its boundaries, and are of higher ecological value.
- 08
- 5.16 Two Local Wildlife Sites (LWS) are located within/ adjacent to the land and 15 LWS are within 1km. The on-site LWS are:
- Fox Covert including Cowhey Dam which includes a range of habitats including a pond, bluebells and locally rare bearded couch (*Elymus Caninus*); and
 - Ellams Brook along the southern boundary designated for water voles.
- 08
- 5.17 The woodland at Ellams Brook/ Ellams Rough is also part of the Tree Preservation Order (TPO) Haydock Park (No 5 1993).
- 5.18 Peel acknowledges the environmental considerations for the site and such areas can be positively planned for in future development of the site. None of the aforementioned features represent a notable constraint to delivery of a significant development on the site. Additional planting associated with future development proposals can be designed to promote enhancements of Green Belt boundaries, ecological and green networks.

Sensitive Uses

- 08
- 5.19 The presence of the residential care facility at the centre of the site does not represent an overriding or significant constraint to development. The presence of the facility can be fully taken in to account by creating a sensitive landscape setting, locating lower scale buildings in those areas closest to the facility, and orienting buildings to mitigate any noise disturbance.
- 08
- 5.20 There is one non-designated heritage asset within the site (Drake Lane), and two on the immediate boundary (including Haydock Park Farm and Park Cottages). Suitable masterplanning for the site would be able to ensure that there are no detrimental impacts upon the non-designated assets and this will not present a constraint to future development at Haydock Point South.

Summary

- 5.21 Following a review of the Sustainability Objectives that are applicable to employment sites, it is evident that Haydock Point South comprises an available and suitable site that is capable of meeting the borough's longer-term employment development needs. The Council's own evaluation clearly undervalues the site in terms of its development potential, without sound evidence to underpin those conclusions.

Green Belt Review

- 10
- 5.22 The Green Belt Review (GBR) (December 2018) similarly appraised the land to the south east of Junction 23, M6, as a larger parcel of land comprising 73.4 ha (Ref. GBP_036). Peel has therefore appraised Haydock Point South, as an individual parcel of land (c. 36 ha) that is suitable and available for future development, as demonstrated within the table below.
- 10
- Policy LPA06
Site GBP_036

Table 5.2: Green Belt Review

GB Review Score for Site GBP_036	Peel's Contentions
Stage 1A Identification of GB parcels and sub-parcels	
Land at Haydock Point South was included within the larger parcel of land comprising 73.4 ha.	As the Green Belt Review also performs the purpose of evidencing site selection, the Green Belt Review should have appraised the land at Haydock Point South on an individual basis (c. 36 ha). The site forms a well-defined parcel of land, bound by the A580 to the north, M6 motorway to the west and deep woodland belts to the east and south.
Stage 1B Assessment of parcels and sub-parcels against GB purposes	
1) To check the unrestricted sprawl of large built-up areas:	
'Medium – The parcel is dislocated from the urban area. The north west boundary of the parcel lies approximately 650m from the western boundary of the large built-up area of Haydock, the western boundary of the parcel	As acknowledged within the Council's review of the larger site, Haydock Point South is bound by the A580 to the north, the M6 to the west, and protected woodland to the east and south.

GB Review Score for Site GBP_036**Peel's Contentions**

10 lies approximately from 370m from the large built-up area of Newton le Willows and the north eastern boundary lies approximately 170m from the large built up area of Golborne. The parcel is bounded to the north by the A580, to the east by protected woodland, to the west by the M6 and to the south in part by the M6 and Newton Lane. The parcel is therefore well contained. However despite the parcel's containment, the dislocation of the parcel from the urban area coupled with its large size and lack of strong boundaries within it, means that development of the parcel would likely lead to unrestricted sprawl.'

10 The parcel is therefore well contained, and alongside the delivery of Peel's wider land interests at Haydock Point North and Haydock Green, the development of Haydock Point South would relate well to the urban area, with immediate access to the strategic highway network. Due to the strong boundary features of the site, the development of this land would not lead to unrestricted sprawl and as such should score 'Low' against this purpose.

2) To prevent neighbouring towns merging into one another:

'High – The parcel forms part of a strategic gap between Golborne and Newton le Willows and in part between Haydock and Golborne. Development of the parcel would lead to a significant reduction in the gap between Golborne and Newton le Willows and between the south eastern part of Haydock and the south western part of Golborne.'

Haydock Point South comprises just under half of the area appraised within the GBR (49%) and as such the site does not form such a critical function to preventing neighbouring towns merging into one another. Following development of the site, a substantial strategic gap would remain between Golborne and Newton le Willows, as well as between Haydock and Golborne. Haydock Point South would not harm the overall strategic gap between neighbouring towns and as such should score 'Medium' against this purpose of the GB.

3) To assist in safeguarding the countryside from encroachment:

10 'Medium – The parcel contains limited inappropriate development and consists mostly of agricultural land and protected woodland that create a countryside character. The M6 to the west and the A580 to the north have some impact on the countryside character but as you move away from these roads there are open views looking southwards, and on the edge of the parcel looking eastwards, that add to countryside character.'

10 The proposed release of Haydock Point South from the GB will result in encroachment into the countryside. However there is a substantial degree of enclosure due to the site's strong boundary features and there is a relatively limited sense of openness. The site should therefore score 'Low' against this purpose.

Overall Scored 'High' overall against the first three Green Belt purposes.

However, Peel consider that this should be recorded as 'Medium' as the overall score is

Overall Haydock Point South should score 'Medium', as in accordance with the GBR methodology.

GB Review Score for Site GBP_036		Peel's Contentions
generally equated to the highest of the individual scores against the 3 purposes ²⁸ .		
Stage 2A Identification of parcels and sub-parcels with 'prohibitive' constraints		
The site is not identified as having any prohibitive constraints.	Peel concurs with the GBR Assessment at Stage 2A.	
Stage 2B Assessment of development potential within remaining parcels and sub-parcels		
Identified as having 'Limited' development potential although the evidence base has not been published to demonstrate how this has been assessed.	The site is within single ownership of Peel, a willing landowner with a proven track record of delivering high quality, large scale and sustainable logistics developments. The site comprises of few technical constraints, all of which can be overcome and as such the site should be acknowledged to have 'Good' development potential.	
Stage 3 Ranking and review of results		
Overall Score: 1 (Tier 7)	Overall Score: 6 (Tier 1) (Stage 1B Score = 3 and Stage 2B Score = 3)	

- 5.23 Peel challenges the methodology that has been adopted to appraise the most suitable land to be removed from the Green Belt to meet the Borough's development needs. From the initial stage of the methodology (Stage 1A), the Council has not suitably identified appropriate parcels and sub-parcels which has subsequently led to inaccurate assessments of land, including Haydock Point South.
- 5.24 Peel has previously promoted the land at Haydock Point South for development and as such the GBR should have acknowledged this land as an individual parcel, not just within the wider assessment of Parcel Ref. GB_036, particularly as the GBR performs the role of a site selection methodology.
- 5.25 As has been identified in Table 5.2, Haydock Point South is defined by strong defensible boundaries, it would maintain a physical and visual separation between settlements in all directions, and the revised Green Belt boundary can form a logical permanent boundary. Therefore, if the site had been appraised on its own merits, it is evident that the Green Belt review should have reached a different conclusion in respect of its contribution to Green Belt purposes.
- 5.26 The same applies in respect of Stage 2B of the assessment, where it is concluded that the site has 'limited' development potential. The evidence underpinning this conclusion is not provided by the Council and therefore no weight can be applied to it. The evidence referred to above, and contained within the Site Prospectus provided at Appendix 3, runs entirely counter to this evaluation, and demonstrates the suitability and deliverability of the site. With adjustment made to reflect the boundary of the site rather than a wider parcel, and to reflect a more accurate evaluation of the site's

²⁸ Green Belt Review, St Helens Borough Council (December 2018), Paragraph 2.30

10 development potential, the overall score for the site would have been higher, and in excess of the alternative sites that have been proposed for release from the Green Belt within the PSLP. 10

5.27 Table 6.2 of the GBR provides further justification for discounting Green Belt parcel Ref. GB_036. Peel challenges the justification that has been provided for discounting the land at Haydock Point South, as follows:

- **Highways Capacity:** As explained above and in the previous sections of this report, the existing highways capacity issues at Junction 23 of the M6 motorway should not restrict development of the suitable and available land at Haydock Point. The proposed mitigation strategy for the junction has yet to be established and as such suitable provision can be made for the development of Haydock Point South within that strategy. Indeed, the land could help to realise planned improvements, as necessary.
- **Protected Woodland:** The supporting studies that have been undertaken confirm that areas of woodland can be retained or where loss is required, mitigated for, within the masterplanning for development of the site.
- **Biodiversity:** The findings of studies undertaken for the land confirm that the site has low ecological value. More detailed surveys will be undertaken to inform final development options and any mitigation strategy, just as can be addressed with any allocated site.
- **Air Quality:** The key air quality considerations of the development will be considered as the proposals for the site progress however given modern vehicle standards, it is not envisaged that air quality will pose a constraint to the development of the site. As Section 3 notes, no statutory objection has been raised in respect of the current application for Haydock Point North in relation to air quality; it can be reasonably assumed that Haydock Point South can advance on a similar basis.
- **Existing Uses on Site:** The residential care unit lies central to the Haydock Point South site, but falls outside of its boundaries. As noted above, and as established within the Site Prospectus for the site, a sensitive landscape setting for the existing care unit will be proposed, with native tree and understorey buffer planting enclosing the northern and eastern boundaries. Lower scale buildings will also be located adjacent to the existing buildings at the centre of the site. 10

10 5.28 Haydock Point South has been inaccurately assessed and Peel has been able to provide a true reflection of the development potential for c. 36 ha of land to the south east of Junction 23, M6. 10

Market Potential

5.29 As addressed above, the Council's evidence on 'development potential', which directly informs the scoring of the candidate sites and hence their selection or otherwise, is deficient in that the reasoning for the scoring is entirely absent. However, it is also

considered deficient in its scope, as it fails to recognise the suitability of sites to meet specific market demand.

- 10
- 5.30 The template for the assessment of development potential as provided at Appendix F of the GBR does not address market attractiveness. It does not consider how sites may respond to the particular development needs which are identified by the wider evidence base. 10
- 5.31 This is a serious shortcoming and further undervalues the potential of the Haydock Point South site. The Council recognises within the PSLP and the supporting evidence base the importance of the large scale logistics market for St Helens, and the notable contribution St Helens can make to meeting not only its own employment needs in this sector but those of the wider Liverpool City Region.
- 5.32 The significant advantages and appeal of Haydock Point North in responding to this market, as addressed in Section 3, are also applicable to Haydock Point South. The site's close proximity to Junction 23 and associated direct access to the motorway network, together with the opportunity to introduce buildings of significant scale, set it apart from other locations and potential sites. The site would be highly attractive to prospective occupiers and in the absence of planning policy constraint could be delivered in the short term. The assertion that the site has 'limited' development potential, and the absence of any weight being applied to the site's strong alignment with market requirements, both undermine the legitimacy of the Council's site evaluation and selection process.

Conclusion

- 5.33 Peel is committed to long term investment at Haydock Point and following the delivery of Haydock Point North, the land around Junction 23 of the M6 motorway will comprise a large scale logistics hub, serving St Helens and the wider Liverpool City Region. Haydock Point South is eminently suitable for large scale logistics development and could positively contribute to the Borough's economy by supplementing this offer and creating an employment location of considerable scale and appeal.
- 5.34 The emerging St Helens Local Plan should remove Haydock Point South from the Green Belt, in order to meet the potential long term development needs of the Borough beyond the plan period. 10
- 5.35 The revised Green Belt boundary would form a logical, permanent boundary and enduring well beyond the plan period. The indicative masterplan contained in the Site Prospectus demonstrates how the site can be delivered, identifying how the few technical constraints on the site can be overcome. Ultimately, Haydock Point South provides an opportunity to create a sustainable extension to Haydock Point North, set in a landscaped setting, directly aligned with market demand.
- 5.36 The site should be designated as safeguarded land for future employment development to address the deficiencies highlighted in the previous section and/or as an alternative to Site 1ES.
- 10

6. Employment Potential of Haydock Green (Policies LPA04; LPA06)

Summary

- As an alternative to allocating the site for housing, as later sections of this report contend is appropriate, Haydock Green should be allocated for employment land. It is a suitable site with strong market appeal. It would facilitate a strategic objective, to improve Junction 23 of the M6.
- As a minimum the site should be designated as safeguarded land.

- 6.1 It has been demonstrated that the PSLP is unsound in respect of its employment strategy; in particular there is a significant deficiency in the quantum of employment land proposed for allocation and a need to allocate additional land. There is also a need to identify additional safeguarded land for future employment development beyond the plan period.
- 6.2 The sections of this report that follow identify serious issues with the soundness of the PSLP in respect of the housing strategy, and support the contention that Haydock Green should be allocated for housing development in the Plan period in order to overcome those issues.
- 6.3 Haydock Green also presents an alternative opportunity, should it not be allocated for housing. The site possesses comparable characteristics to the Haydock Point North and Haydock Point South sites, which make it suitable for employment development of the type needed.
- 6.4 In summary:
- The site is highly accessible to the motorway and strategic road network, lying adjacent to the A580 and Junction 23 of the M6. This is a key requirement of the logistics market for which a significant and growing need has been identified;
 - The site is capable of accommodating large scale logistics buildings, ranging up to 38,000 sq m / 410,000 sq ft in size. As the preceding sections have identified, the logistics market is driving demand for these larger units and the supply of such opportunities is limited within the North West region;
 - The site has no insuperable constraints. Landscape features of value can be readily incorporated; residential amenity can be protected by separation / suitable site masterplanning. Any impacts can be mitigated.

- 6.5 In addition, and consistent with Haydock Point North, the site's development would help to realise the strategic objective of improving Junction 23 comprising a significant benefits of the proposals. Draft Policy LPA07 of the PSLP identifies *'improvements to existing motorway capacity and infrastructure with particular priority being given to the M6 Junction 23 and M62 Junction 7'* as a critical intervention needed to deliver its strategic priorities for the transport network; namely to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions.
- 6.6 As noted earlier, St Helens Council, in consultation with Highways England, has commissioned a study to consider the opportunity for capacity improvements at Junction 23. While this study is currently on-going, it is understood that the preferred options all involve the diversion of the southern A49 Lodge Lane arm of the junction located to the east of the site such that this does not interact with the junction thus alleviating pressure on the junction. The diversion of this arm of the junction would therefore provide a primary and significant benefit of allowing traffic travelling between the A49 and the A580 to the west to bypass Junction 23.
- 6.7 In keeping with the aspirations of the Junction 23 Study, and recognising the importance of the A49 Lodge Lane as a link between Newton-le-Willows and the A580 and M6, Peel proposes that the A49 could be diverted to the west of J23 utilising land at Haydock Green and within its control. This diversion would be incorporated as part of the development of the site.
- 6.8 The potential route of the diverted A49 is shown on the Framework Masterplan contained within **Appendix 7**. This show the A49 diverting into the site at the eastern site boundary. However, subject to further development there could be the potential to retain southbound movements on the A49 away from Junction 23. Should this option be progressed then a priority controlled junction could be introduced to allow the A49 to divert into site. Under either option, sufficient land controlled by Peel and the highway authority is available to deliver a junction that would meet recognised highway design standards.
- 6.9 Within the Haydock Green site it is suggested that the A49 routes to the east of the existing woodland area, before finally forming a junction with the A580. While the design of the junction would be subject to detailed capacity assessment, it is anticipated that it be signal controlled and allow vehicles to turn east towards the M6 and Manchester and west towards St Helens and Liverpool. The Framework Masterplan suggests a location in which a junction fully compliant with recognised highway design guidelines can be delivered. However, alternative locations for a junction with the A580 are also available within the frontage of the Haydock Green site, and the site masterplan could be amended to accommodate an alternative alignment should this be a preferred option.
- 6.10 The Framework Masterplan at **Appendix 7** therefore demonstrates how a critical part of the improvement scheme can be delivered and facilitated through the allocation and development of Haydock Green. There is no other means of achieving this aspect of the improvement scheme.

- 6.11 This is an additional and significant benefit of developing the site which weighs in favour of its allocation. The site is unique in this regard. This benefit should be reflected in the Council's consideration of this site and its sustainability credentials relative to others.
- 6.12 **Appendix 7** illustrates the site's capability to accommodate large scale logistics development (totalling c 96,000 sq m /1,036,000 sq ft), taking in to account the site's features and surroundings, and considers the overall suitability of the site (paragraph 10.8). Further detail on the site's constraints and suitability for development is provided in Section 10 of this report. A consideration of the site's Green Belt contribution is also set out in Section 10 of this report (paragraphs 10.25 to 10.41). This demonstrates that the Council's GBR overstates the site's contribution and therefore the harm that would arise from its release and allocation for development.
- 6.13 The suitability and market appeal of the Haydock Point North site has been addressed in Section 3, with it being demonstrated that the Council's reasons for non-allocation are flawed. The Haydock Green site possesses many of the same positive features as the Haydock Point North site. As with the Haydock Point site, the Haydock Green represents a more suitable and deliverable site than sites that are proposed for allocation in the PSLP.
- 6.14 Should the site not be allocated for housing development as the Plan advances, Haydock Green site as a direct alternative it should be allocated for employment development alongside the Haydock Point North site, either as an additional site to address the land deficiency and provide greater flexibility, or as an alternative to less suitable and deliverable sites presently proposed within the PSLP.
- 6.15 As a minimum, the site should be designated as safeguarded land. In doing so, alongside the Haydock Point South site it can help address the notable deficiency in safeguarded land identified in Section 4. However, this would not bring about the same opportunity for Junction 23 improvements in the plan period as would be associated with the site's allocation for development.

PSLP HOUSING STRATEGY

7. The proposed housing requirement (Policy LPA05)

Summary

- Peel supports that the Council has identified a need to increase the baseline housing requirement to deliver its economic growth strategy.
- However, the level of uplift proposed is insufficient to achieve this end and will not provide sufficient housing to accommodate the employment growth aspirations of the Borough.
- The PSLP underestimates the level of employment which can be created through the proposed employment allocations, which themselves should be increased in number as set out in section 2 to 5 of this report.
- The PSLP relies on increased in-commuting to the Borough and therefore on residential growth outside of St Helens to support its economic growth.
- Taking these points together there is a need for the PSLP to plan for the provision of between 600 and 800 residential units per annum, which aligns more closely with the findings of the Draft SHELMA.

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- 7.1 Paper 2 of Peel's representation considers the soundness of the housing requirement set out in Policy LPA05 of the PSLP with regards to its compliance with the NPPF and PPG.
- 7.2 Specifically, this has focused on the evidence published by the Council to justify its concluded need for 486 homes per annum in St Helens over the plan period (2016 – 2035), noting that this level of need is directly translated into the proposed requirement.
- 7.3 By way of context, this annual housing requirement has reduced by circa 15% from the 570 dwellings per annum proposed in the POLP. It equates to a total cumulative requirement for 9,234 dwellings over the plan period, reduced from 10,830 dwellings in the POLP.
- 7.4 It is recognised that the PSLP housing requirement and the underpinning evidence of housing need has been produced within the context of the NPPF and PPG, as revised in 2018. The revisions have introduced a new method for calculating housing need which has formed an important context for the change in the requirement.

The Council's calculation of housing need

- 7.5 In arriving at the new housing requirement, the Council has correctly started by using the output of the standard method. In accordance with the PPG, it has then identified a

number of circumstances where it is likely that the *'actual housing need is higher than the standard method indicates'*²⁹.

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- 7.6 Principally, the Council has identified that the method *'does not take into account the increased employment growth that is likely to result from the development of the sites that are allocated for employment development'*. These sites are integral to delivering the Council's growth strategy, which underpins the strategic policies of the PSLP. It is also noted that the Council recognises further justification for going beyond the standard method, acknowledging an *'upward pressure'* on the standard method figure on the basis of a long-term worsening of affordability.
- 7.7 Where such circumstances are acknowledged, the PPG makes clear that the impact on housing need will *'need to be assessed'* before the identified need is then subsequently translated into a housing requirement.
- 7.8 In undertaking this assessment, the Council has drawn upon two new evidence-based reports, a SHMA Update and ELNS Addendum. Both reports were published in January 2019.
- 7.9 On the basis of this evidence, the Council has derived its proposed housing requirement by selecting *'the scenario that is considered to be the most realistic'* from the evidence base³⁰. The selected scenario suggests that 486 dwellings per annum are needed, with this figure directly translated into the housing requirement in Policy LPA05.
- 7.10 This does represent an elevation from the output of the standard method for St Helens (468dpa), albeit only by a modest 18 dwellings per annum or 4%. The Council implies that this modest increase will support its growth strategy, and alleviate potential affordability pressures.

The Critique of the Evidence and the Housing Requirement

- 12
- 7.11 Peel welcomes the view expressed by the Council in the PSLP that there would be disadvantages in relying only on the standard method. Furthermore, Peel strongly supports the principle of identifying the housing needed to align with the Council's commitment to economic growth, with this ambition key to the PSLP. It is also important to recognise that the growth strategy is based upon the provision of employment land within St Helens to accommodate unmet needs from the Liverpool City Region (and Warrington), specifically relating to demand for logistics and warehousing space capitalising on sectoral opportunities which exist within St Helens due principally to its strategic accessibility.
- 7.12 Peel agrees with the Council that the proposed employment growth strategy is likely to be deliverable, in accordance with the PPG, subject to making sufficient land of the right quality and location available for development. This recognises the commitment of the City Region and the Government to support the basis of the Growth Strategy through the funding and investment agreed in the Devolution Deal. At a local level, it is
- Policy LPA05
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²⁹ PPG Reference ID 2a-010-20190220

³⁰ St Helens Council (January 2019) St Helens Borough Local Plan 2020-2035 Submission Draft, paragraph 4.18.8

acknowledged that the success of the strategy is dependent upon the take-up of employment land opportunities, specifically with regards to warehousing and logistics uses. There is strong evidence of high demand for land in these sectors in the borough and the City Region as a whole, with this evidenced further within other parts of Peel's representations.

12 7.13 Peel also agrees that in arriving at an appropriate calculation of housing need, building on the standard method, the key point of consideration for St Helens is the extent to which its pursuit of a deliverable growth strategy will result in a need for housing which exceeds that associated with a continuation of past trends into the future. 12

7.14 The evidence in Paper 2 has identified that the proposed 4% increase from the standard method is not appropriate, and will not support the growth strategy for St Helens. The housing provision that will actually be needed to enable the growth strategy – and in particular the anticipated scale of employment growth – is considered to be notably higher, thereby requiring a more pronounced elevation from the standard method.

7.15 In arriving at this conclusion, the following represent key points of consideration and findings from the evidence base:

- 12 • In estimating the job growth that is likely to result from delivery of the economic growth strategy, the evidence base has applied a number of assumptions which collectively underestimate the full potential for employment generation. This includes, but is not limited to, the unjustified removable of land north east of Junction 23 of the M6, which is part of Peel's land holdings, as an employment allocation. Further evidence to support the reinstatement of this site is included within sections 2 to 5 of this representation report. 12
- AMION has undertaken a critique of the Council's forecasting of job growth, and concluded that it in the order of 17,000 additional jobs could be reasonably expected in St Helens over the plan period, based on its portfolio of employment land. This aligns closely to the scale of job growth envisaged for the borough under the Growth Scenario in the City Region SHELMA.
- 12 • The SHELMA assessed the housing needed to support this growth using a consistent approach across the City Region, and concluded that some 855 homes would be needed each year in St Helens to support such a level of job growth. This is some 83% higher than the standard method. Further modelling has been presented in this report which draws upon the latest available evidence and applies reasonable assumptions with regards to changing labour-force behaviours. This modelling serves to broadly validate this level of need, albeit identifying that it is reasonable to assume that it could underestimate the full associated need where alternative assumptions are applied in particular with regards to commuting. 12
- Even where a lower level of job growth is assumed – linked to the Council's modelling of various growth scenarios (11,967 jobs; scenario 2) – the modelling indicates that considerably more than 486 dwellings per annum will be needed in St Helens over the plan period, contrasting with the conclusions of the SHMA

Update. It is estimated that closer to 600 – 800 dpa would be needed even to support this more modest level of job growth.

- The evidence in Paper 2 has identified that the principal reason for this variation in the housing needed to support economic growth in St Helens relates to the incorrect and unjustified treatment of future commuting flows in and out of the Borough within the Council's modelling. In linking housing provision with the anticipated creation of around 12,000 jobs on employment sites across St Helens, the Council's evidence base assumes that a substantial proportion of the new homes required to support economic growth are provided for outside of the Borough. This position is not supported by either the current generation of emerging Local Plans in neighbouring areas, or any emerging outputs of a spatial framework for the City Region. Whilst it is considered reasonable to anticipate some change in commuting dynamics where St Helens provides for above trend employment growth – itself linked to providing for unmet employment land needs – the implied scale of change is unsubstantiated in the evidence, and unjustified.

7.16 Taken collectively, the above points of critique clearly confirm that the PSLP must acknowledge that a greater need for homes will be created by its growth strategy. This must be reflected in a substantially elevated housing requirement.

Policy
LPAOS

18 7.17 As a minimum, the evidence indicates that the Council should consider a housing requirement which is closer to 600 homes per annum. In the context of the Growth Plans being pursued and the scale of job growth associated this should be viewed as very much the lower end of a potential range of need. The modelling has identified that in excess of 800 homes per annum could justifiably be identified as being needed where either the full scale of potential job growth is recognised or a more modest change in the commuting ratio across the authority is assumed.

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7.18 In accordance with the PPG, it is also advised that the Council more fully considers the scale of need calculated in the SHELMA where, as noted above, a level of job growth more closely aligned with that identified by AMION was assumed. The significantly higher derived figure in this previous assessment of housing need should form another point of consideration to take into account in setting the housing requirement.

7.19 It is also apparent that recent rates of delivery strongly validate that there is a high demand for housing in St Helens. Recent delivery has exceeded the figure derived from the standard method – and indeed the proposed housing requirement – by some way, lending further support to a more positive and appropriate uplift.

19 7.20 Finally, the Council has failed to take account of the scale of affordable housing need in setting the housing requirement, as required by the PPG. The Council's evidence confirms a substantial need which would not be met by a continuation of past delivery trends. The establishment of a higher housing requirement, aligned more closely to the need indicated as being required to support employment growth, would also offer significant opportunities to increase the provision of affordable housing to meet needs in full.

Policy LPAOS
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- 7.21 In order for the PSLP to be found sound, the Council must revisit and elevate the calculation of housing need to accord with the PPG and ensure consistency and integration across its strategic policies. This should accord with the NPPF, which confirms that a strategy – including a housing requirement – which either fails to promote sustainable patterns of growth or severely restricts economic growth would form neither a positive, nor justified, nor effective, nor national policy consistent approach.
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8. The developable housing land supply (SHLAA and LPA05.1)

Summary

- A critique of the Council's housing land supply has identified that a more realistic developable supply figure of 7,666, rather than 8,478³¹ should be carried forward.
- Whilst the PSLP may continue to support all sites within the identified supply to the level of yield assumed, the inherent uncertainty with respect to this supply and the risks of non-delivery would justify applying a 20% uplift to the overall housing requirement.
- Based on planning for at least 600 dwellings per year as, the minimum suggested through section 6 of this paper and applying the appropriate flexibility buffer, additional land to deliver in excess of 3,000 dwellings over the plan period will need to be identified through the release of further Green Belt land on top of the quantum already proposed for release.

- 8.1 Paper 2 of Peel's representation has identified a need for the PSLP to seek to deliver at least 600 dwelling per annum over the period 2016 to 2035 rather than 486 as proposed by the PSLP, as also summarised in section 7 above. The overall housing requirement would increase from 9,234 to at least 11,400 as a result.
- 8.2 Paper 3 of Peel's submission also considers the sufficiency and adequacy of the identified housing land supply to meet the housing requirements of the PSLP and, applying the test in NPPF, whether on a site-by-site and collective basis, this supply can reasonably be considered to be developable to the level assumed.
- 8.3 Paper 3 has identified that:
- (a) The overall housing land requirement over the plan period should be uplifted by 20% to allow for flexibility and to safeguard against under delivery having regard to makeup of the identified housing land supply and the potential for non-delivery of some sites;
 - (b) Small and medium sized sites should account for no more than 15% of the total requirement.
- 8.4 Paper 3 has demonstrated that the developable housing land supply from specifically identified sites over the period 2017 to 2035 totals 7,666 units³², rather than 8,478 assumed by the Council, following a full appraisal of the supply. This is not to say that those sites which Peel does not consider to have been proven to be developable

³¹ Taking into account SHLAA sites 2016 – 35 plus proposed allocations only

³² Taking into account SHLAA sites 2016 – 35 plus proposed allocations only

should not be supported by the plan but rather that there is a significant level of uncertainty as to whether, when considered on a collective basis, they will come forward over the plan period to the extent that these sites can be considered to present a reliable developable supply having regard to the definition in the Framework.

- 8.5 A cautious approach is therefore needed to ensure, collectively, the portfolio of sites selected for development can deliver the full requirement. There is a quantitative and qualitative dimension to this.
- 8.6 This uncertainty can be mitigated through including a full 20% flexibility allowance within the housing land requirement – i.e. identifying sites which could deliver 20% more housing than the PSLP requirement. The extent to which there are questions over the reliability of the developable supply would support the view that St Helens needs to make provision for this.
- 8.7 It is accepted by Peel that adding a 20% increase to the requirement and then discounting the supply by 812 (8,478 – 7,666) units based on the assessment undertaken would be double counting in this regard. The preferred approach is therefore to simply increase the requirement by 20% to ensure a flexible and deliverable plan is progressed.

Residential housing land requirement

- 8.8 Through combining the conclusions of Papers 2 and 3, it is possible to identify the extent of additional housing land which the Local Plan will need to identify to deliver the full and proper housing requirement. This is presented in Table 8.1 below.

Table 8.1: Adjusted residential housing land requirement 2016 - 2035

		PSLP	Peel adjusted
HOUSING NEED			
a)	Overall housing requirement	9,234	11,400 ³³
b)	Buffer for flexibility/non-delivery	1,128 (12%) ³⁴	2,280 (20%)
c) (a+b)	Total need	10,362	13,680
HOUSING SUPPLY			
d)	Yield from SHLAA sites (including provision from 2032 to 2035)	6,422	6,422 ³⁵

³³ This is at the lower end of the range which Paper 2 identifies as being necessary to meet the Borough's housing requirements

³⁴ This is based on the 'non-delivery' allowances shown in table 4.6 of the PSLP. Note that the PSLP reduces the supply by this level rather than increasing the requirement, though the result is the same.

³⁵ As outlined in this report, Peel considers this figure to be substantially lower but has proposed this be dealt with through inclusion of an appropriate flexibility allowance of 20% added to the requirement to mitigate the risk of under delivery. The characteristics of the supply and risks and uncertainties highlighted regarding the certainty of its delivery justify this approach.

		PSLP	Peel adjusted
e)	Yield from Green Belt releases	2,056	2,056
f)	Yield from delivery 2016 to 2017	489	489
g)	Small sites/windfall	1,395	1,395 ³⁶
h) (d+e+f+g)	Total supply	10,362	10,362
SHORTFALL			
i)	Residential housing land requirement to be identified through further Green Belt releases (c-h)	0	3,318

- 8.9 Table 8.1 demonstrates that the Local Plan will need to identify developable land to deliver at least a further 3,318 dwellings over the plan period. This is itself a conservative estimate as it is based on an annual housing requirement which sits at the lower end of the range identified through Peel's Paper 2 submission. This requirement will need to be met exclusively through the release of additional land in the Green Belt.

³⁶ Paper 3 of Peel's submission outlines that reliance on small/windfall and medium sites is too high against the Council's housing requirement. In the context of an uplift in requirement as proposed by Peel, the proportion of small/windfall and medium sites would be at a more appropriate level. As such no reduction to the supply in Peel's adjusted calculation. A reduction in reliance on small/windfall and medium sites would be justified if the PSLP housing requirement were maintained

9. Does the distribution of housing land accord with the spatial strategy?

Summary

- The PSLP presents an unbalanced distribution of housing land which does not reflect the Spatial Vision, Policy LPA02 or the Proposed Strategy identified as being the most sustainable through the SA process, being characterised by an over provision of housing land within the St Helens Core Area and an under provision within Haydock and Blackrock. The aspirations of the PSLP and the delivery strategy are inconsistent as a result and the former will not be realised.
- Contrary to its stated aims, the PSLP does not achieve an effective integration of housing and employment land and a co-location of the two. There is no relationship between the selection of sites for residential and employment development in this regard, exacerbating unsustainable travel patterns which the PSLP's objectives explicitly seek to avoid.
- The approach to the selection of housing sites for allocation is flawed in not being informed by any consideration of the desired spatial distribution of development, which is explicitly defined through the PSLP and subject to testing through the SA process. The spatial distribution of housing sites is a by-product of a narrow site assessment process which has no means of controlling the overall distribution of sites when considered on a cumulative basis. This is fundamentally at odds with the PSLP objective to achieve a defined spatial distribution of development characterised by 'balanced growth'

Achieving a 'balanced' distribution of housing land

- 9.1 The PSLP Spatial Vision sets out an aspiration to achieve the *'balanced regeneration and sustainable growth of its (St Helens) built up areas...'* This is translated into a Spatial Strategy through Policy LPA02. It notes that growth will be focused on the Borough's key settlements, namely the St Helens Core Area, Blackbrook and Haydock, Newton-le-Willows and Earlestown, Rainford, Billinge, Garswood and Rainhill and that *'new development will be directed to sustainable locations that are appropriate to its scale and nature and that will enable movement between homes, jobs and key services and facilities to be made by sustainable non-car modes of transport.'*
- 9.2 In identifying specific settlements to be the focus of future development, it is acknowledged by the Council that each settlement has a defined character and function, providing a range of services and facilities which meet the needs of their resident population. The stated desire to achieve 'balanced' growth is a clear acceptance that each settlement has a need to accommodate development in order to achieve a sustainable future.
- 9.3 Further detail on the intended spatial distribution of development is presented in the Council's SA which considers five options for the distribution of housing, out of which a

selected option for the PSLP emerges; this being 'the proposed strategy' which is described as 'balanced growth, close to employment opportunities with a longer term aspiration to deliver a garden suburb'³⁷ The proposed strategy is identified as a combination of a number of options but most closely aligned with the 'balanced growth' option described as 'Regeneration of the urban area but with increased distribution of development to settlements with deliverable sites, new employment allocations and adequate services and facilities'³⁸

- 9.4 As the selected spatial strategy proven to be the most sustainable through the SA process, the PSLP, and the allocation of sites for residential development must reflect the SA proposed strategy when considered on a cumulative basis.
- 9.5 Peel has calculated that the overall housing land supply relied upon to deliver the PSLP housing requirement comprises the following:
- SHLAA sites 2017 – 32: 6,287 units
 - SHLAA sites which will continue to deliver after 2032: 135 units
 - Delivery between 2016 and 2017 – 489 units
 - Small sites allowance 2017 – 32 – 1,395 units
 - Green Belt releases – 2,056 units
- 9.6 The identified land supply has a total assumed capacity of 10,362 units. Of this, 2,056 will be delivered on land currently within the Green Belt.
- 9.7 Taking those components of the supply which are identifiable as specific sites (i.e. excluding the small sites/windfall allowance and delivery to 2017), with a cumulative capacity of 8,478, the resultant housing land supply³⁹ is distributed across the Borough is as follows.
- St Helens Core area: 6,536 (77%)
 - Blackbrook and Haydock: 589 (7%)
 - Newton-le-Willows and Earlestown: 794 (9%)
 - Billinge and Seneley Green: 223 (3%)
 - Rainford: 308 (4%)
 - Rainhill: 28 (less than 1%)

³⁷ St Helens Borough Local Plan 2020-2035 – Submission Draft Sustainability Appraisal: SA Report (January 2019) Table 4.2

³⁸ St Helens Borough Local Plan 2020-2035 – Submission Draft Sustainability Appraisal: SA Report (January 2019) Table 4.2

³⁹ This supply excludes units delivered between 2016 and 2017 and small/windfall sites both of which are included in the Council's overall supply for the plan period and assumed to be distributed on a similar basis to that of the identified sites

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- 9.8 It is noted that St Helens Core Area is proposed to deliver 77% of the total identifiable land supply. By contrast, Haydock and Blackrock will deliver 7% of the total supply.
- 9.9 The nine wards which make up the St Helens Core Area account for approximately 58% of the existing population of the Borough. By contrast Haydock and Blackrock account for 12.6% of the Borough's population. Relative to the existing size of the settlement areas as defined in the PSLP, St Helens Core Area will very clearly accommodate a disproportionately high share of the overall housing requirement and Haydock/Blackbrook a disproportionately low share.
- 9.10 By contrast, within the POLP Peel estimates that Haydock / Blackrock would accommodate approximately 11% of the overall housing requirement, having regard to proposed allocations and non-Green Belt supply representing a more balanced approach to distribution in accordance with the stated aims of the Local Plan.
- 9.11 The PSLP is clear that it seeks to achieve a 'balanced' distribution of housing. It is accepted by Peel that the SA identifies a strategy of 'balanced growth' (which encapsulates a degree of focus on the regeneration of the main urban area) alongside dispersal across the wider Borough, rather than 'Proportionate growth/greater dispersal' (SA Option 1) as the chosen strategy. In this context, balance is to some degree subjective. However, it logically includes a reasonably proportionate distribution of housing across the Borough. Anything which substantially deviates from this cannot reasonably be described as being balanced – it would, by definition, be unbalanced.
- 9.12 If the same identifiable housing land supply were distributed on an absolute proportionate basis (based on the size of each defined settlement) the distribution would be as follows:
- St Helens Core area (nine wards): 4,917 units (58%)
 - Blackbrook and Haydock (two wards): 1,068 units (12.6%)
 - Newton-le-Willows and Earlestown (two wards): 1,068 units (12.6%)
 - Billinge and Seneley Green (one ward): 534 units (6.3%)
 - Rainford (one ward): 373 units (4.4%)
 - Rainhill (one ward): 525 units (6.2%)
- 23
- 9.13 Comparison of the above with the schedule at paragraph 9.7 illustrates the extent to which, relative to their existing size, the proposed supply in Blackbrook and Haydock and, separately, Rainhill, is very low. The overprovision in St Helens Core Area relative to its size is readily apparent.
- 9.14 It is accepted that the urban land supply means that the distribution presented at paragraph 9.12 cannot be accurately achieved, noting that at 5,728 units, as calculated by Peel, the Council's claimed supply within the main urban of St Helens may exceed
- 23

this area's overall requirement if development were sought to be distributed on a truly proportionate basis.

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- 9.15 However, in this case the PSLP is exacerbating an already unbalanced distribution of existing housing land by proposing the release of additional Green Belt land for residential development on the edge of the St Helens Core Area (allocations 4HA and 5HA relate) without strategic policy support for this approach. By implication, a number of other areas, including Haydock and Blackrock, are underprovided for this regard. In the context of a selected spatial strategy which seeks the balanced distribution of residential development, rather than explicit focus on development within **and** growth of the main urban area, this is not justified and evidently presents a conflict with the findings of the SA.
- 9.16 The proposed strategy as identified through the SA process is noted as being closely aligned to the balanced growth option (Option 2), focused on the '*regeneration of the main urban area*', with '*increased distribution to other settlements*.' To the extent that this justifies a degree of bias to the main urban area (defined as the St Helens Core Area in the PSLP), this should be focused on genuine regeneration opportunities, true to the proposed strategy identified through the SA process and, by definition, development within the existing St Helens Core Area, rather than extensions to it. The outward growth of the main urban area beyond this is not part of the selected spatial strategy for the Borough and directly prevents the PSLP from delivering a distribution of development which reflects the balanced growth it seeks.
- 9.17 Beyond the significant urban land supply, which, if delivered, will evidently go a long way to achieving the urban regeneration objectives of the PSLP, the allocation of additional land on the edge of the St Helens Core Area cannot be expressly justified in the context of the selected spatial strategy. Such allocations will evidently not contribute to the regeneration of the main urban area, as a core component of the proposed strategy and, in the context of an aspiration to deliver increased distribution of development beyond the St Helens Core Area, would be at odds with the proposed spatial strategy.
- 9.18 The allocation of site 4HA is a potential exception to this since the allocation of the Garden Suburb is itself defined within the spatial distribution tested through the SA process and selected as the most sustainable, rather than this being selected through the site appraisal process. However, in contrast site allocation 5HA particularly cannot be justified.
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Distribution of safeguarded land and land which will deliver development beyond the plan period

- 9.19 The unbalanced distribution of residential development is reinforced by the approach to Safeguarded Land and the distribution of allocations which will continue to deliver beyond the plan period. The distribution of such sites should also be approached in the spirit of the proposed strategy identified through the SA process.
- 9.20 It is noted that, in residential capacity terms, 82% of the proposed safeguarded land (which totals 2,641 units) is located within the St Helens Core Area (or more accurately as extensions to it). In addition, 95% of housing which the PSLP allocates but which will come forward beyond 2035 (total of 2,906 units), will also be delivered within the St
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23 Helens Core Area. Of the total 'beyond the plan period supply' of 5,547 units, 5,238 units (94%) are located within or on the edge of the St Helens Core Area. The unbalanced distribution of residential development will very clearly be exacerbated beyond the plan period as a result. 23

Summary

- 9.21 Due to the selection of sites for release from the Green Belt on the edge of the St Helens Core Area (either for allocation or safeguarding), the resultant distribution of residential development during the plan period and beyond will be fundamentally at odds with the PSLP spatial vision, Policy LPA02 and the spatial distribution identified as being the most sustainable through the SA process.
- 9.22 With the exception of site 4HA, it is Peel's position that in order for the PSLP to comply with its own spatial strategy and that identified as the most sustainable through the SA process, no further land should be released from the Green Belt adjacent to the St Helens Core Area for residential development during plan period. There should also be a substantial reduction in safeguarded land allocations around the Core Area. Any resultant land requirement (allocation or safeguarded) should be redirected to other settlements to achieve a more balanced distribution of allocations.
- 9.23 In this regard, it is noted that the wards of Haydock/Blackrock are particularly under provided for in terms of allocations during the plan period, accounting for just 7% of the identified land supply, against an existing residential population which accounts for 12.6% of the Borough total. This supports a proportionate redistribution of housing allocations towards Haydock/Blackrock in order to address this critical deficiency in the PSLP. This alone, and without having any regard to the need for any uplift to the overall requirement and any consideration of whether the identified supply is genuinely developable, would necessitate at least an additional 450 residential units being delivered in Haydock/Blackrock to meet its needs during the plan period and to achieve a spatial distribution which is consistent within the PSLP's stated spatial strategy.
- 23 9.24 There should also be a redistribution of sites to meet residential development beyond the plan period such that these too are distributed on a balanced basis. Taking the cumulative capacity of sites allocated as safeguarded land and units to be delivered on allocated sites beyond 2035, based on a balanced approach to distribution, sites capable of delivering some 665 residential units beyond the plan period (i.e. allocated as safeguarded land) should be identified in Haydock/Blackrock (12.6% of 5,547). 23

Integration of housing and employment development

- 9.25 The PSLP Spatial Vision states that housing will be well connected to employment areas. Policy LPA02 adds that new development will be directed to sustainable locations that will enable movement between homes and jobs. The proposed strategy for the distribution of residential development as identified through the SA process is also described as '*balanced growth close to employment opportunities.*'
- 9.26 The proposed spatial strategy is therefore underpinned by a desire to achieve an appropriate co-location of housing and employment development. This should be reflected in the resultant spatial distribution of residential development sites. However, it is evident that there is no consistency between the location of housing and

employment allocations or between the location of housing allocations and existing strategic employment areas.

- 23
- 9.27 The PSLP notes the opportunity presented by the Borough's strategic location and connectivity to accommodate large scale logistics development. Its economic strategy is focused on growing this sector and realising the employment potential arising from growing demand for large scale logistics facilities. The PSLP recognises the locational requirements of this sector and allocates land along the M6 and A580 corridors for this purpose. This includes 78.21 ha at Haydock (sites 2EA, 3EA, 4EA, 5EA, 6EA) and 144.12 ha at Parkside (sites 7EA and 8EA). 23
- 9.28 It also allocates a further site of 55.90 ha as safeguarded land to the north east of J23 of the M6 to meet development needs beyond the plan period (site 2ES). This representation has set out a case for the allocation of the site to the north east of J23 to meet development needs over the plan period, plus the allocation of an additional 36 ha of land to the south east of J23 as safeguarded land. Notwithstanding these proposed amendments, it is evident that the PSLP supports a significant amount of new employment development concentrated around Junctions 22 and 23 of the M6 within the northern part of the Borough and within the wards of Haydock, Earlestown and Newton.
- 9.29 As a ward area, Haydock accounts for 16%⁴⁰ of all jobs within St Helens. Only the town centre ward, which includes the main town centre of St Helens, accounts for more jobs (30%), though it is noted that a large proportion of these will be in part time and lower paid roles, including the retail and food and drink sectors. After Haydock, the ward which accommodates the next most jobs is Newton (9%). Taken together, Haydock, Blackbrook, Earlestown and Newton account for 30% of all jobs in the Borough.
- 9.30 It is noted that 95% of the land proposed for allocation for employment development is located within the two defined settlement areas of Haydock/Blackbrook (M6 J23) and Newton/Earlestown (M6 J22).
- 9.31 Development around Junction 23 will further cement Haydock's position as the primary employment area in the Borough. Even without the changes proposed by Peel in respect of land to the north east and south east of J23, the ward of Haydock is expected to accommodate an additional 3,000 – 4,000 jobs based on the allocations proposed (77 ha). This would represent an increase of between 30 and 40% in the number of jobs within Haydock.
- 23 9.32 The Parkside allocation in Newton-le-Willows could create a further 6,000+ jobs based on 144 ha of land. This could increase the overall number of jobs within the Haydock/Blackbrook and Newton/Earlestown areas by some 10,000 (52%). 23
- 9.33 An effective integration of residential and employment development, as a core principle of the PSLP, would logically require a significant proportion of the PSLP's

⁴⁰ Business Register and Employment Survey 2017 (ONS 2019)

residential allocations to be located in or in close proximity to these areas given their existing and growing economic role.

- 23
- 9.34 The Council's GBR, which is the principal tool used to select sites for allocation, considers proximity to services (district or local centre) and public transport routes from which a variety of locations can be accessed as one of the criteria in the appraisal of sites for residential allocation. However, this is a crude assessment and is not well equipped to ensure the beneficial effects of close proximity to strategic employment sites are recognised and given due weight in the process of appraising residential sites in the spirit of the spatial strategy which the PSLP seeks to deliver.
- 9.35 The SA approach to the appraisal of individual residential sites is also flawed in this regard. SA Objective 14 is '*to ensure local residents have access to employment opportunities.*' The performance of a site against this objective is based on the distance of the site to the nearest employment area. The size and role of that employment area is not taken into account however. Thus, notwithstanding the aspiration to achieve an effective integration of housing and employment development, the additional sustainability benefits of a site being located in close proximity to strategic employment locations, particularly within Haydock and Earlestown/Newton, which provide the majority of current and future job opportunities, is not taken into account at all. The assessment process is flawed as a result and is ill equipped to ensure the portfolio of allocated residential sites reflect the proposed strategy as identified through the SA process.
- 9.36 This deficiency has significant unintended implications for the PSLP, as evidenced when the distribution of residential sites results from the site selection process is considered. Of the 2,056 residential units to be delivered through the release of land from the Green Belt, only 581 (c28%) will be delivered within those wards within which the majority of PSLP strategic employment allocations (95% of the Borough total) are located or those wards from which these employment locations can be most easily accessed (those being Haydock, Blackbrook, Moss Bank, Earlestown and Newton). Of the total housing supply (Green Belt releases plus urban land supply) only 19.6% will be delivered in these wards. It is notable that these wards account for 31% of the Borough's existing population.
- 23
- 9.37 By contrast, of the 2,056 residential units to be delivered through the release of land from the Green Belt, 1,000 units (c48%) will be delivered in those wards most distant from the concentration of existing and proposed employment development around junctions 22 and 23 of the M6 (namely Town Centre, Parr, Sutton, Thatto Heath, West Park and Eccleston). Of the total supply (Green Belt releases plus urban supply) approximately 52% is located within these wards.
- 23
- 9.38 This analysis highlights a clear disconnect between the distribution of future housing development and both existing and proposed employment development. The PSLP's aspiration to achieve an effective integration of the two forms of development to promote accessibility to employment and sustainable transport choices will very evidently not be achieved. The distribution of residential allocations does not reflect the SA's proposed strategy of achieving balanced growth '*close to employment areas.*'

- 23
- 9.39 This deficiency can be addressed through seeking to achieve a closer physical relationship between the proposed housing allocations and key strategic employment locations. This particularly reinforces the need to allocate additional land for residential development within Haydock/Blackrock to both deliver a more balanced distribution of housing sites and a more effective co-location of residential and employment development. This is necessary to ensure the delivery strategy for the plan is aligned with its stated spatial strategy and that which has been proven to represent the most sustainable through the SA process. Without this step being taken, the PSLP is very clearly internally inconsistent and its vision, aims and objectives will not be delivered. The PSLP is fundamentally unsound as a result. 23

Council's approach to selection of sites for allocation

- 9.40 It evident that regard must be had to the aspired distribution of residential development sites through the site appraisal process, alongside other considerations, to achieve the desired spatial distribution. Sites cannot be considered isolation and outside of this context.
- 9.41 In this instance, the site selection process has a narrow focus with no consideration of the wider spatial context to individual sites, focusing instead on Green Belt harm and the perceived sustainability of each site considered in isolation and without regard to where, relative to the PSLP's stated spatial strategy, the site is located within the Borough. The process is ill equipped to realise the spatial strategy which the PSLP seeks in this regard.
- 9.42 The selection of sites for allocation for residential (and employment) development is driven principally by the findings of the Council's GBR. This seeks to identify sites which will result in least harm to the Green Belt if released and subsequently developed. The assessment attempts to balance this against the need to select sites which present the most sustainable options when considered against other indicators of sustainability (e.g. accessibility).
- 9.43 An initial sifting of identified Green Belt parcels is undertaken to filter out those which are deemed to make the greatest contribution to the Green Belt (Stage 1B). Any such parcels are immediately discounted and not given any further consideration for assessment. Only parcels which progress beyond Stage 1B, and which are not subsequently discounted due to constraints which would otherwise prevent their development (Stage 2A), are considered against other sustainability criteria such that the full merits of their release can be considered (Stage 2B). 23
- 23
- 9.44 Parcels are then ranked (Stage 3A) following which those which would be most suitable for release for development during the plan period or designated as safeguarded land to meet development requirements beyond the plan period are identified (Stage 3B).
- 9.45 By virtue of Stage 1B, the selection of parcels for release from the Green Belt is primarily driven by perceived harm to the Green Belt, with the merits of individual parcels in other regards only coming into the process at a later stage. The selection of sites is heavily weighted towards Green Belt considerations therefore.

- 23
- 9.46 Whilst important to understand the Green Belt contribution made by individual parcels, this is only one consideration in the selection of sites for allocation. All indicators of sustainability must be considered in the selection process. This approach is required by the Framework which states that *'when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.'*⁴¹ and that when defining Green Belt boundaries Local Plans should *'...ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development'*⁴²
- 9.47 As noted, the PSLP must seek to control and manage the spatial distribution of development to deliver a sustainable future for the Borough. Spatial distribution cannot be an output of a site assessment process rather it must inform the selection of sites.
- 23
- 9.48 It is evident that the Council's approach to the selection of sites for allocation is substandard in this regard. Contrary to the requirement of paragraph 139 of the Framework, the Council has not considered whether and to what extent a site's release from the Green Belt for development would contribute positively to the PSLP's overall vision and objectives, including Spatial Strategy Policy LPA02, rather the spatial distribution is simply a by-product of the process of appraising sites undertaken on a narrow basis.
- 9.49 To address these deficiencies in the site selection process, all sites should be carried forward into Stage 2A of the Green Belt Assessment process, given that it has a broader focus than purely identifying Green Belt contribution, following completion of Stage 1B. Alongside this, the PSLP should seek to identify a broad housing requirement for each defined settlement location which reflects the balanced strategy and effective integration of residential and employment development which it seeks. This should then inform the selection of sites through the GBR process, with the most sustainable sites in each settlement selected as needed to deliver the requirement for that settlement.
- 9.50 Deviations from this distribution may be justified but only where there are insufficient sites in the identified settlement locations which meet basic sustainability criteria to deliver the allotted requirement.

⁴¹ National Planning Policy Framework (MHCLG 2019) paragraph 138

⁴² Ibid paragraph 139

10. Proposed residential development at Haydock Green

Summary

- Peel's proposed site at Haydock Green presents a sustainable residential development opportunity, the allocation of which would address a number of deficiencies identified in the PSLP, particular regarding the spatial distribution of residential development, the need for more effective co-location of residential and employment land and the quantitative under allocation of housing land.
- The site would realise significant highways and transport benefits in delivering part of the desired improvement works to Junction 23 of the M6, as a stated objective of the PSLP. The site is unique in this regard.
- Peel does not agree with the Council's appraisal of the site through the SA and GBR processes. Peel's adjusted assessment has proven that the site would represent a highly sustainable residential opportunity relative to other sites and that the site makes a very limited contribution to the St Helens Green Belt.
- The site should be allocated for residential development during the plan period.

10.1 Peel's land interests in the Borough include approximately 32 ha of existing Green Belt land located to the south west of Junction 23 of the M6. Peel has consistently promoted this site for release from the Green Belt and its allocation for residential development. The site is otherwise referred to as Haydock Green. A site location plan is provided at Appendix 1.

10.2 Haydock Green is capable of providing approximately 520 high quality residential dwellings, as a modest and sustainable extension to the settlement of Haydock. It occupies a highly accessible location, integrated into the existing road infrastructure network, close to local public transport services and in close proximity to existing areas of employment in Haydock and to proposed employment allocations centred on Junction 23.

Haydock Green treatment in the POLP

10.3 The site was proposed for allocation for residential development in the POLP (December 2016). This was underpinned by:

- An annual housing requirement of 570 dwellings per annum (17% higher than the proposed PSLP requirement);
- A plan which proposed the balanced distribution of residential development sites across the Borough and achieved a more effective co-location of residential and employment development;

- 24
- The parcel within which the site was located being deemed to make a 'low' contribution to the Green Belt in respect of two out of the three Green Belt purposes against which the parcel was assessed.
- 24

10.4 The PSLP, and its evidence base, now deviate substantially from the above. Peel strongly objects to the treatment of the Haydock Green site within the PSLP and its evidence base. It renders the PSLP unsound as presented.

A deliverable housing site

10.5 The analysis above has demonstrated a need for the Local Plan to identify an additional supply of residential land capable of delivering over 3,000 further dwellings over the plan period. There is a clear numerical need for the release of Haydock Green from the Green Belt and its development for residential uses over the plan period.

10.6 Section 9 of this report has demonstrated a clear need to reconsider the spatial distribution of housing allocations across the Borough to achieve the objectives of the plan. It has revealed that an unbalanced distribution of residential development is proposed through the PSLP which disproportionately favours the St Helens Core Area, with a resultant under provision of housing in the other named settlements, including Haydock/Blackrock, and a disconnect between the distribution of housing and strategic employment locations, contrary to the PSLP's stated aspirations. To correct this, additional land must be allocated for residential development outside of the St Helens Core Area and particularly in Haydock given its critical economic role.

10.7 As part of Peel's previous representations to the Local Plan, a Site Prospectus for Haydock Green has been provided. This is provided at Appendix 4. This outlines an overall vision for the site and demonstrates how it can be delivered in a sustainable manner in response to the constraints and opportunities presented.

10.8 This demonstrates that the site is not affected by any insurmountable constraints which cannot be addressed through standard mitigation measures and which would otherwise inhibit its deliver. It outlines that:

- The site occupies a sustainable location from which a range of local services and facilities within Haydock, Newton-le-Willows and Ashton in Makerfield can be readily accessed;
 - The site is located close to existing and proposed employment areas around Haydock which can be easily accessed on foot;
 - The site is well served by public transport with four services per hour running along Vista Lane to the west of the site and Newton-le-Willows train station located within 2km of the site;
 - The site is not publically accessible, aside from a single PROW crossing the land, comprising private land in agricultural use;
 - The site comprises largely arable / grassland fields which are generally of low ecological value, though with some blocks of mature woodland and streams,
- 24

ponds and hedges running through the site and around its perimeter which may be of some ecological value. Ecological features can be retained and enhanced as part of the development;

- The site is of limited landscape sensitivity and development offers the opportunity to enhance and protect the site's landscape features, including woodland and hedgerows;
- The site is of low heritage value. There are no designated heritage assets within the site and does not affect the setting of any heritage assets located beyond the site's boundary;
- Effective design measures can be incorporated into the scheme to ensure that the development provides an acceptable noise environment for residents having regard to local sources of noise from the M6/A580;
- The layout of the development can respond to the presence of pipeline installations beneath the site, as informed by advice received from HSE.
- The site is located in Flood Zone 1 and is not at risk of flooding therefore.

10.9 The site's features and characteristics have informed the development of a deliverable masterplan for the site as presented in the Site Prospectus.

Highway improvement opportunities

10.10 As noted above, St Helens Council, in consultation with Highways England, has commissioned a study to consider the opportunity for capacity improvements at Junction 23 of the M6 motorway. While this study is currently on-going, it is understood that the preferred options all involve the diversion of the southern A49 Lodge Lane arm of the junction located to the east of the site such that this does not interact with the junction thus alleviating pressure on the junction. The diversion of this arm of the junction would therefore provide a primary benefit of allowing traffic travelling between the A49 and the A580 to the west to bypass Junction 23.

10.11 In keeping with the aspirations of the Junction 23 Study, and recognising the importance of the A49 Lodge Lane as a link between Newton-le-Willows and the A580 and M6, Peel proposes that the A49 could be diverted to the west of J23 utilising land at Haydock Green and within its control. This diversion would be incorporated into and delivered as part of the residential development at no cost to the Council or Highways England.

10.12 The potential route of the diverted A49 is shown on the modified Framework Masterplan at Appendix 5. This shows the A49 diverting into the site at the southern site boundary. However, subject to further development there could be the potential to retain southbound movements on the A49 away from J23. Should this option be progressed then a priority controlled junction could be introduced to allow the A49 to divert into site. Under either option, sufficient land controlled by Peel and the highway authority is available to deliver a junction that would meet recognised highway design standards.

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- 10.13 Within the Haydock Green site it is suggested that the A49 routes to the east of the existing woodland area, before finally forming a junction with the A580. While the design of the junction would be subject to detailed capacity assessment, it is anticipated that it be signal controlled and allow vehicles to turn east towards the M6 and Manchester and west towards St Helens and Liverpool. The Framework Masterplan suggests a location in which a junction fully compliant with recognised highway design guidelines can be delivered. However, alternative locations for a junction with the A580 are also available within the frontage of the Haydock Green site, and the site masterplan could be amended to accommodate an alternative alignment should this be a preferred option. 24
- 10.14 The diverted A49 route would be designated as a 30mph zone, and would be designed such that it can be adopted by the highway authority. The realigned road would not prejudice the opportunity for residential development on either side, and could also act as a local distributor road for areas to the east.
- 10.15 Draft Policy LPA07 of the PSLP identifies '*improvements to existing motorway capacity and infrastructure with particular priority being given to the M6 Junction 23 and M62 Junction 7*' as a critical intervention needed to deliver its strategic priorities for the transport network; namely to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions.
- 10.16 Initial discussions with St Helens Council Officers have revealed the aspirations for improvements to Junction 23 to deliver Policy LPA07, as informed by the emerging Junction 23 study. The Updated Framework Masterplan as presented in this representation has outlined how a critical part of the improvement scheme can be delivered and facilitated through the allocation and development of Haydock Green for residential development. There is no other obvious means of achieving this aspect of the improvement scheme.
- 10.17 This represents a change in circumstances since the site was last considered for allocation by the Council. It is an additional and significant benefit of the scheme which weighs in favour of its allocation for residential development. The site is unique in this regard. This benefit should be reflected in the Council's consideration of this site and its sustainability credentials relative to others.

Sustainability Appraisal of Haydock Green

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SA

- 10.18 Haydock Green is assessed as a potential development allocation in the Council's Sustainability Appraisal (SA) (January 2019) (Aecom Site ID 49). This considers the sustainability performance of the site against the identified SA objectives. 41
- 10.19 Peel has reviewed the SA and does not agree with its findings in respect of Haydock Green. As an evidence base to support the PSLP, it is deficient as a result and renders the PSLP unsound in its current form.
- 10.20 Most notably, in respect of the appraisal of Haydock Green, in a number of instances little to no regard has been had to the potential mitigation solutions available to address known or potential environmental and other constraints, including those

41 presented through the Site Prospectus and illustrative masterplan as provided by Peel. The update to the Framework Masterplan as summarised above is also relevant to SA process and would affect its findings in this regard. Peel also disagrees with some of the judgements made within the SA in respect of a number of the objectives. 41

10.21 As a result, it is Peel's view that the overall scoring of the site should be amended. To assist, Appendix 6 of this representation report presents the Council's appraisal of the site alongside revised scoring as suggested by Peel. Associated commentary is provided.

10.22 The moderated appraisal at Appendix 6 is informed by evidence presented in the Site Prospectus and the proposals for the site as presented by Peel, including additional highways proposals to improve the operation of Junction 23 of the M6. It records that in respect of the 17 SA objectives against which the site is assessed, Peel does not agree with the Council's conclusion in respect of four of these, namely:

- SA1 (To protect and enhance biodiversity): should be amended from 'Likely to generate negative effects' to 'Potentially negative effects which could be mitigated'
- SA9 (Ensure access to and protection and enhancement of high quality public open space and natural green space): should be amended from combination of 'Likely to promote positive effects' and 'Potentially negative effects which could be mitigated' to exclusively 'Likely to promote positive effects'
- SA15 (To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth): should be amended from 'Potentially negative effects which could be mitigated' to 'Unlikely to have significant effects'
- SA16 (To improve access to a range of good quality and affordable housing that meets the diverse needs of the Borough): should be amended from 'Potentially negative effects which could be mitigated' to 'Likely to promote positive effects'

41 10.23 Whilst in respect of SA15, a case could be made that the site should be amended to 'Likely to have positive effects' the SA is a comparison exercise and it is noted that no site assessed for residential development is given this score. The score against SA15 is adjusted to 'Unlikely to have significant effects' accordingly to be consistent with most other residential sites as assessed for the stated reasons. 41

10.24 With these amendments to the assessment of Haydock Green, the site would perform favourably against a number of the sites proposed for allocation. This is presented in Table 10.1 below.

Table 10.1: Sustainability Appraisal of Haydock Green: comparison against sites selected for release from the Green Belt for residential development during the plan period other Green Belt release proposals

Site allocation / Green Belt release	Comparative performance of Haydock Green in the moderated SA	Is Haydock Green more or less sustainable in overall terms as a result?
8HA	better in respect of seven SA objectives, worse in respect of just two SA objectives and the same in respect of the rest;	More sustainable
1HA	better in respect of eight SA objectives, worse in respect of just four SA objectives and the same in respect of the rest;	More sustainable
7HA	better in respect of five SA objectives and the same in respect of the rest;	More sustainable
4HA	better in respect of six SA objectives, worse in respect of just one SA objective and the same in respect of the rest;	More sustainable
2HA	better in respect of four SA objectives, worse in respect of five SA objectives and the same in respect of the rest;	Less sustainable
5HA	better in respect of seven SA objectives, worse in respect of two SA objectives and the same in respect of the rest;	Less sustainable

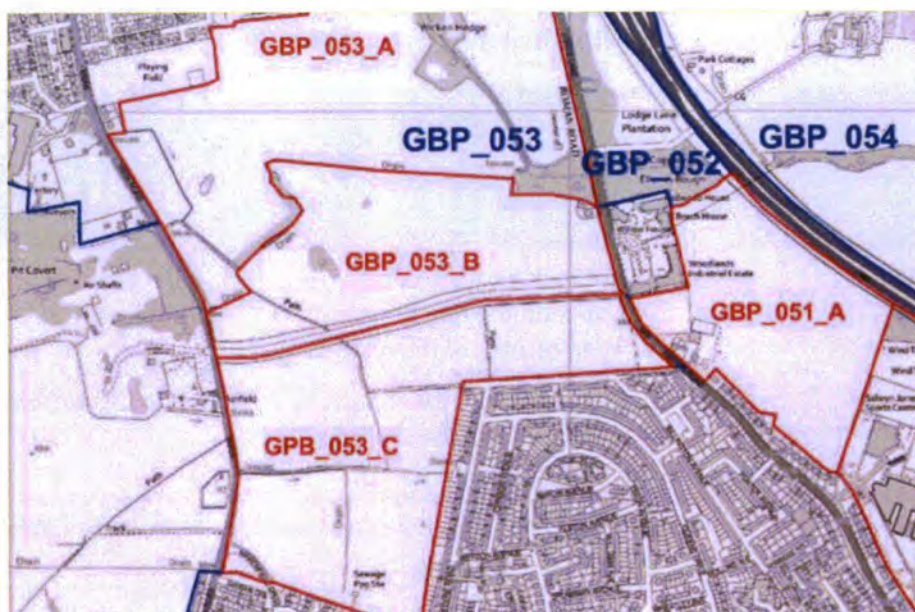
Green Belt appraisal of Haydock Green

- 10.25 Section 9 of this representation report provides comments on the overall approach to the Green Belt Assessment and particularly the failure to include a consideration of the PSLP spatial strategy as an input to this and to the appraisal of sites for allocation.
- 10.26 In addition Peel does not agree with the conclusions drawn regarding the Green Belt contribution made by the parcels within which its landholding at Haydock Green is located.
- 10.27 Haydock Green forms the northern part of parcel GBP_053. This has been subdivided into three separate parcels (053_A, 053_B and 053_C) for the purposes of the assessment. Peel's land holding corresponds with parcel GBP_053A (See Figure 9.1 below).

Policy
LPAOS
Green Belt
Review

24

Figure 10.1: Green Belt Sub-parcel 053A



- 10.28 The subdivision of the parcel contrasts with the Draft Green Belt Appraisal (December 2016) which assessed Parcel 053 as a whole. Subdivision allows the contribution made by individual sub-areas of the parcel to be considered, insofar as these provide a more realistic definition of the potential development allocations being considered by the Council and may make a different contribution to the Green Belt than the parcel as a whole. The decision to appraise parcels on this basis is supported by Peel.
- 10.29 The Green Belt Appraisal records that Parcel 053_A makes a **medium** contribution to Green Belt purpose 1 (To check the unrestricted sprawl of large built up areas); a **high** contribution to Green Belt purpose 2 (To prevent neighbouring towns from merging with one another); and a **high** contribution to Purpose 3 (To assist in safeguarding the countryside from encroachment).
- 10.30 In accordance with the stated methodology, Parcel 053_A is deemed to make an overall '**High+**' contribution to the Green Belt and is therefore discounted at Stage 1B.
- 10.31 The Council's assessment of this sub-parcel differs greatly from that set out in the Draft Green Belt Appraisal (December 2016), when it was considered as part of the larger Parcel 053. This assessment concluded that the parcel was of 'low significance' in respect of Purpose 1, 'high significance' in respect of Purpose 2 and 'low significance' in respect of Purpose 3. The judgements in respect of Purposes 1 and 3 were made based on:
- The parcel being 'well contained' on three sides;
 - The parcel being 'over 2/3s' enclosed with moderate openness to the west (albeit framed by a strong boundary);
 - 81.2% of the parcel being enclosed by strong boundary.

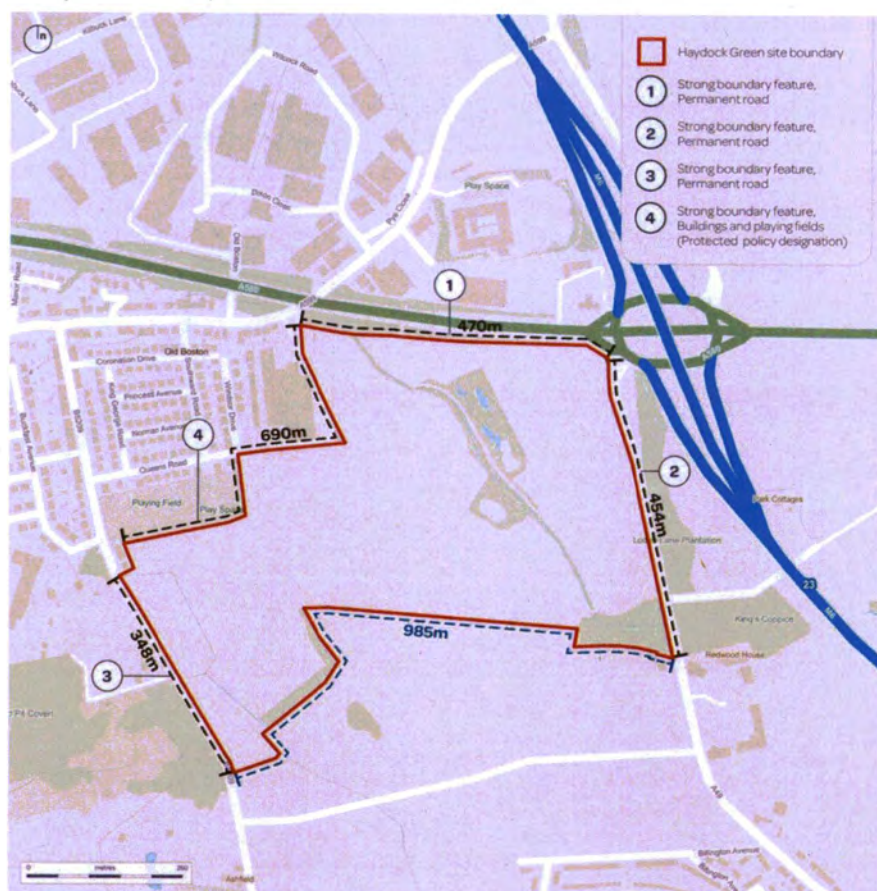
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10.32 Whilst Peel's land holding is now assessed independently of the wider parcel, there is no reason why different conclusions should now be reached. Taking Parcel 053_A on its own, it is noted that:

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- It is enclosed on three sides, being open only to the south;
- 66% of the parcel is enclosed by a strong boundary, comprising the A580 to the north, Lodge Land to the east and Vista Road the west.

10.33 This is illustrated through Figure 10.2 below.



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Figure 10.3: Gap between Parcel 053_A and Newton-le-Willows

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- 10.36 Whilst this relatively narrow gap means the parcel has a score of 'high' against Purpose 2, it also supports the conclusion that the parcel makes a limited contribution in respect of Purpose 1. In this regard, even if the weaker southern boundary were breached, the outward sprawl of the built up area would clearly be restricted by the limited area of land available before the urban edge of Newton-le-Willows is reached. 24
- 10.37 In this instance, given the strong boundaries to the north, west and east, it is Peel's position that the parcel performs a very limited role in checking the 'unrestricted sprawl' of the built up area, noting that the Council has placed reliance on the definition of sprawl as '*Spread out over a large area in an untidy or irregular way.*'⁴³ Put simply, given the limited gap between the southern boundary of the site and the settlement of Newton-le-Willows, the area over which the outward expansion of the settlement could feasibly take place if Parcel 053_A were not designated as Green Belt is very evidently small. The parcel cannot therefore make a strong contribution to Green Belt Purpose 1.
- 10.38 Finally, in respect of Purpose 3, it is noted that the Council's assessment focuses on parcel containment and the presence of development within the parcel to distinguish between parcels which are urban fringe in character and areas more characteristic of open countryside – the latter being judged to perform a greater function in respect of Purpose 3. The appraisal refers to PAS advice in considering this matter.
- 10.39 The PAS guidance defines urban fringe areas as '*land under the influence of the urban area.*'⁴⁴ By contrast, the Council's appraisal refers to urban fringe as '*land that has been affected by existing development*'.⁴⁵ These are subtle but important differences.
- 10.40 The Council's appraisal gives Parcel 053_A a high score against Purpose 3 due to the limited level of development within the parcel, open views and its '*strong sense of countryside character.*' For the reasons, presented above, Peel does not agree with the Council's conclusions regarding the extent to which the site is well contained, and therefore has open views beyond its boundaries. Further, Peel considers that the Council's approach to determining the extent to which a parcel is characteristic of the countryside is deficient. Most notably, this fails to recognise that the urbanising impacts on a parcel may exist beyond the parcel. 24
- 10.41 In this instance, Parcel 053_A is located adjacent to the intersection of the M6 motorway and the A580, marking the gateway to the urban area of St Helens with major commercial and leisure developments focused around the junction. The presence of this strategic road infrastructure and the level of activity associated with its operation are felt within the site (being both visible and audible) and have a strong bearing on its character. Using the PAS definition of the urban fringe, this context has a significant influence on the land and the extent to which it has a countryside characteristic. It Peel's considered view that as a result of the urbanising influences 24

⁴³ St Helens Local Plan Green Belt Review (December 2018) para 2.18

⁴⁴ Planning on the doorstep: the big issues – Green Belt (Planning Advisory Service / Local Government Associated 2015)

⁴⁵ St Helens Local Plan Green Belt Review (December 2018) para 2.27

located close to the site, the site is evidently characteristic of urban fringe as a result and, as such that Parcel 053_A should be given a 'low' score in respect of Purpose 3.

10.42 Taking these points into account, Peel considers that Parcel 053_A should be given the following scoring in respect of the three purposes of the Green Belt assessed:

- Purpose 1(to check the unrestricted sprawl of large built up areas): **LOW**
- Purpose 2 (to prevent neighbouring towns from merging into one another): **HIGH**
- Purpose 3 (to assist in safeguarding the countryside from encroachment): **LOW**

Concluding comments

10.43 In the context of a need to allocate additional Green Belt land to meet the residential development needs of the Borough; to direct additional housing to Haydock to achieve a more balanced and proportionate distribution of housing; and to direct additional residential development to those areas of the Borough which are closest to the existing and proposed major employment sites to achieve an effective integration of the PSLP's housing and employment strategies, Haydock Green represents a sustainable development opportunity, capable of making a strategic contribution to meet the Borough's development needs in a sustainable manner.

10.44 The site also provides the unique opportunity to deliver significant highway infrastructure benefits through facilitating the diversion of the A49 through the site and thus taking this out of Junction 23. This represents a significant benefit of the development which no other site in the Borough can provide. This has not been considered by the Council in assessing the site to date but should be taken into account in reconsidering the merits, benefits and sustainability credentials of this site relative to others.

10.45 In addition, the assessment above has identified a number of deficiencies in the Council's appraisal of the site through the Green Belt Appraisal and Sustainability Appraisal processes. This critique has demonstrated that:

- The site's overall Green Belt contribution should be recorded as 'medium' rather than 'high' as concluded by the Council. The Council's conclusions in respect of Green Belt Purposes 1 and 3 are erroneous. Accordingly the site should have progressed beyond Stage 1b of the Green Belt Appraisal process and should be subject to a full assessment of its potential to be developed alongside other candidate Green Belt releases;
- The Council has incorrectly scored the site against four of the seventeen SA Objectives against which the site is assessed in the Sustainability Appraisal. With these corrections, the site would be shown to be more sustainable than four out of six of the selected allocations in the PSLP and six out of eight sites proposed to be allocated as Safeguarded Land.

10.46 The PSLP's evidence base is deficient as a result and so the PSLP cannot be justified. It is therefore unsound.

11.24 10.47 Peel strongly objects to the Council's decision to no longer allocate the site for residential development, which results from a flawed process of assessing the site in terms of its sustainability, its contribution to the Green Belt and the failure in the process to have proper regard to the PSLP stated aspiration to achieve a balanced distribution of residential development and appropriate extent of co-location between residential and employment uses. 11.24

10.48 These deficiencies in the Council's assessment of the site should be addressed through an update to the Local Plan evidence base, undertaken on a more appropriate basis in response to the issues raised in this representation. This would demonstrate that the site represents a sustainable residential opportunity, providing unique benefits whilst avoiding the release of land which makes a significant contribution to the Green Belt and the purposes of including land within it.

TECHNICAL COMMENTS ON EVIDENCE BASE

11. Viability Assessment

- 11.1 This section of the representation report sets out Peel's detailed comments upon the Council's Economic Viability Assessment (December 2018) (EVA) which underpins the affordable housing policy requirements set out in the PSLP. Requests for clarification and modifications to the EVA are proposed under a series of thematic headings.
- 11.2 It is Peel's view that a number of the input assumptions adopted within the EVA are incorrect or inappropriately evidenced. The impact of this is that the results of the EVA overstate the financial viability of development sites.
- 11.3 As a result, Peel regards the EVA as failing to comply with the requirements of the National Planning Policy Framework (NPPF)⁴⁶, which at paragraph 31 states:
- "...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."*
- 11.4 The matters of representation are set out under the following subheadings with reference made to the headings and paragraph numbering within the EVA for ease of cross-reference.

Planning Policy Context

- 11.5 Section 2 of the EVA includes a breakdown of the PSLP policies that are most relevant to the [EVA] study and potentially impact on development within the Borough. Peel regard it as essential that any policies that affect costs or impact upon viability are appropriately modelled and evidenced prior to adoption.
- 11.6 EVA Paragraph 2.18 sets out the target for Policy LPA05: Meeting St Helens Housing Needs, quoting a minimum of 9,234 net additional dwellings, in the period from 1 April 2016 to 31 March 2035, to be provided in the Borough at an average of at least 486 dwellings per annum. It is noted that PSLP Policy LPA01 references that 2,223 (24%) of units are anticipated to be provided as affordable during the Plan period.

Methodology

Appraisal Methodology

- 11.7 The sites allocated for new housing development range in size from 181-2,988 units, in brownfield and greenfield locations. A residual approach to determine viability has been adopted in the testing of the allocation sites. A range of generic 'development typologies' are introduced at EVA Paragraph 3.29 and EVA Tables 3.4 and 3.5.
- 11.8 There are nine generic development typologies adopted, ranging from 5-200 dwellings. Each generic 'scheme' is tested at a range of densities: 30; 35 and 40 dwellings per hectare (dph) and based upon pre-determined zoning (value areas). It should be noted

⁴⁶ Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

at this point that the generic development typologies are typically much smaller than the PSLP site allocations.

- 11.9 The PSLP identifies (10) sites allocated for new housing development up to 31 March 2035. The EVA adopts development densities ranging from 30-40 dph, in line with PSLP Policy LPAOS.

- 25 11.10 EVA Table 3.5 details the Testing Typologies for the apartments: with 'Scheme 8' stated to be a 10 unit scheme. However, viability results and construction costs within the EVA relate to a 15 unit scheme, and the typology in EVA Table 3.5 requires correction. 25

- 11.11 The adopted apartment unit mixes do not match the earlier stated assumptions and these discrepancies require revision, with current appraisal results inappropriate for further review.

- 26 11.12 EVA Tables 2.2 and 3.6 contain the gross to net site area calculations for strategic and generic sites, with Net Developable Area ranging from 100% of gross area for sites of less than 0.4 hectares (ha) to 75% of gross area for sites over 2 ha, which are regarded as appropriate for generic site testing up to 200 units. 26

- 27 11.13 It is anticipated that sites above this threshold will include larger areas of constraint to development will be required to provide greater areas of public open space – it is noted that three of the council's site allocations are over 20 ha. A Net Developable Area equating to 60% of gross site area is regarded as more appropriate for these sites. Although the gross to net site areas adopted in the EVA are in line with SHLAA, Peel is of the opinion that these calculations require revision to more realistically reflect market reality. 27

- 28 11.14 EVA Table 3.13 sets out a summary of the key PSLP policies that impact upon the viability of development sites and the application of input assumptions within the EVA testing to reflect such policy costs. The EVA testing adopts a S106 contribution of £1,000 per dwelling in consideration of planning policy LPA08: Infrastructure Delivery and Funding. There is no evidence provided to demonstrate that this rate is appropriate. Evidence from previous approved developments should be provided by the Council to corroborate the appropriate and evidenced level of S106 contribution. 28

Overview of St. Helens

- 11.15 EVA Table 4.6 contains a comparison of new build and resale property transactions in St. Helens, over a 12 month period from May 2017. The number of sales for each month should be included to provide context and to ensure that the comparison between new build and resale units is based upon an appropriate evidence base.

Financial Appraisal Assumptions

Benchmark Land Values

- 11.16 In order to establish the base input land costs necessary to provide a competitive minimum return for the land owner, to enable development to be deliverable in line

with Planning Practice Guidance⁴⁷ (hereafter 'PPG') and the NPPF, Keppie Massie has considered a range of land values based on the likely revenues that residential developments would be expected to achieve across the Borough and the availability of land for development. Keppie Massie cite a need to regard evidence of current use values and evidence from sites with [residential] planning permissions, to allow an assessment of Existing Use Value (EUV) plus a landowner's premium; and the influence of supply dynamics.

11.17 EVA Appendix 4 contains details of residential land sales. The residential land sales table displays: affordable housing zone; address; location; developer; site type; no. of units; net area (ha); price paid; price (per net ha); price (per net acre); and date of acquisition. Sources of data are stated as Land Registry, EGi and Co-Star. Peel is not aware that such data sources can provide the net developable area of sites, and the source of such data must be stated to ensure that accuracy and consistency can be checked.

11.18 Peel acknowledges that specific site sales values must be assessed with some caution as differing levels of constraints can impact on achieved values. They do, however, provide very useful context when assessing the value at which a greenfield land owner may be prepared to release their site for development in comparison with a brownfield site owner. The values proposed as being sufficient to provide a competitive return to brownfield/previous developed and greenfield land owners are set out within EVA Table 5.1, which is repeated below:

Affordable Housing Zone	Previously Developed		Greenfield	
	(£ per ha)	(£/acre)	(£/ha)	(£/acre)
1	370,500	150,000	370,500	150,000
2	617,500	250,000	370,500	150,000
3	864,500	350,000	617,500	250,000

Table 5.1: Residential Benchmark Land Value Assumptions

11.19 The EVA applies a consistent benchmark land value between brownfield and greenfield sites within the Zone 1 (lower value) area.. However, for Zones 2 and 3 (increasing value) areas, it is proposed that a brownfield land owner would require an uplift of +66.7% and +40.0%, respectively, of the value required by a greenfield land owner.

11.20 The residential land sales evidence within EVA Appendix 4, containing 17 records, suggests combined £per net acre average prices of £160,696 per acre (Zone 1), £285,848 per acre (Zone 2) and £695,204 per acre (Zone 3). The data is heavily weighted towards brownfield sites. Twelve entries are pure brownfield transactions. There are four entries of a greenfield/brownfield mix, which are all within Zone 2 and present average of £251,768 per acre. There is only one pure greenfield entry: Zone 2 at £213,656 per acre.

11.21 The data presented in the EVA is insufficient to support the benchmark land value assumptions adopted for greenfield sites and the land sales evidence does not provide

⁴⁷ Ministry of Housing, Communities and Local Government: Planning Practice Guidance last updated 22 October 2018

31 a sufficient evidence base to justify the adoption of differential brownfield and greenfield benchmark land values. 31

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- 11.22 It is both our and Peel's experience that greenfield land owners will have very strong expectations in respect of the value of their land within the development market and, if it is deemed appropriate for their land to be released for residential development, they will see no reason why they would achieve a lower price than would be achieved for a similar parcel of previously developed land. 32
- 11.23 Peel regards the provision of an appropriate explanation of base input land cost as a critical issue in ensuring that the viability of sites are assessed on an appropriate and equitable basis. As it stands, this is not the case. Peel is of the strong opinion that base input land values for greenfield development sites must be increased to parity levels with previously developed land values.
- 11.24 The Viability Testing Results, set out in section 6 of the EVA, for the generic typologies presents greenfield sites as generating greater viability than brownfield sites – with greenfield schemes in Zones 2 and 3 required to contribute greater proportions of affordable housing than brownfield schemes.
- 11.25 The assessment of a significantly lower greenfield base input land value within the EVA engineers a result that indicates higher viability for development on greenfield land and lower viability for development on brownfield land. This approach is unreasonable given that the land values are not borne out in reality, with the differential un-evidenced.
- 11.26 The EVA does not state whether the £/acre benchmark land values are assessed with reference to the net or gross area of a site. Clarity in this regard is essential, as site owners will require that their achieved rate is sufficient to encourage their release of their total (gross) site area.
- 11.27 It is assumed that the benchmark land values are provided on a net basis, as this is adopted in the table of site comparables within EVA Appendix 4. When assessed on a gross area basis, the lowest benchmarks will reduce to £112,500 per gross area for larger greenfield sites, which are assumed within the EVA to have a gross:net reduction of 25%. As previously referenced, it is Peel's opinion that larger sites in excess of 20ha will require a 40% gross:net reduction. Should this be applied within the EVA, it would reduce the lowest benchmark land values to £90,000 per gross acre, which is regarded as wholly insufficient to facilitate the release of a site for development. 32
- 11.28 It is Peel's request that Keppie Massie, acting on behalf of the Council, engage with landowners, promoters and developers to rectify the concerns raised by effectively establishing and seeking to agree appropriate benchmark land values, which will be sufficient to incentivise market delivery, prior to the Examination of the PSLP. PPG is clear on the importance of this process in ensuring the evidence base is robust:

32 In order to establish benchmark land value, plan makers, landowners, developers, infrastructure and affordable housing providers should engage and provide evidence to inform this iterative and collaborative process.⁴⁸ 32

- 11.29 Engagement to date has been insufficient to address outstanding issues raised.

Commercial Land Values

- 33 11.30 Commercial land sales evidence is provided within EVA Appendix 4. However, the price paid for two sites: Canada Dock and Stopgate Lane are not provided, yet, the EVA includes the price per hectare and price per net acre – values which couldn't be calculated without a price paid. Full site value information must be provided. 33

- 34 11.31 In addition, the price (per ha) values do not appear to have been correctly calculated. For example, the Beacon 62 site is assessed at £322,174 per ha whereas the price paid divided by site area (ha) equals £319,149. The data and table must be updated and corrected to enable appropriate stakeholder review. 34

Residential Appraisal Assumptions

Development Programme

- 35 11.32 EVA Paragraph 5.30 proposes a sale rate of "between 2 and 3 per month". It remains unclear how the sales rate varies between each scheme assessed and Zone. This should be made clear, with evidence required to support the adopted sales rate. 35

- 11.33 EVA Paragraph 5.31 refers to sales rates that "tend to increase in respect of larger sites as developers seek to 'double up' and develop out in tandem." An adopted rate "from 4 up to 10" per month is stated for the very largest allocation. The EVA does not provide specifics on the number of outlets assumed on the largest sites. Furthermore, the adopted rate for each specific site remains unclear.

- 11.34 The EVA provides no appraisals or cash flow details. There is, therefore, no transparency in respect of the application of the assumptions which are stated within the EVA. This approach is not appropriate when viewed against the requirement for transparency and publication of viability evidence within the NPPF and PPG. . The provision of appraisals and cashflows to support the results and conclusions of the EVA are regarded as essential and are hereby requested to enable an appropriate level of stakeholder review and engagement.

Sales Values

- 11.35 The source of sales value data (achieved price and floor area) included within EVA Appendix 2 is not stated. This information must be provided to ensure that accuracy and consistency can be checked.

- 36 11.36 EVA Paragraph 5.37 states a requirement for provision of bungalows on greenfield sites delivering 25 or more new homes – in line with PSLP policy LPC01. The EVA states that there has been limited development of new bungalows in St Helens Borough, but from their experience a "premium above prevailing values" is normally paid for them. The EVA applies a 10% uplift on selling prices (contained in EVA Table 5.3) for bungalows 36

⁴⁸ MHCLG (2018) Planning Practice Guidance - Viability

36 within their testing. Peel request that evidence of Keppie Massie's experience and more detailed reasoning to support this uplift assumption is provided. The current assumption runs the risk of overstating the financial viability of larger sites. 36

37 11.37 In respect of Affordable Housing, EVA Paragraph 5.38 states that the values adopted are based on the likely bids by a Registered Provider and reflect evidence of sales values for affordable stock. The EVA adopts 45% of market value for Affordable Rent and 70% of market value for Affordable Home Ownership. No evidence is provided to support the proposed affordable housing values. It is the opinion of Turley and Peel that current offers from active Registered Providers for Affordable Home Ownership schemes would equate to 65% of the market value and a reduction in this tenure pricing is requested. 37

11.38 Peel request that opinions of value should be obtained from Local Registered Providers of affordable housing, with such opinions published by Keppie Massie to support the values adopted for viability testing.

11.39 Peel is concerned that the current revenue input assumptions for Affordable Home Ownership tenure units will be overstate the financial viability of development sites within the EVA viability appraisals.

Construction Costs

38 11.40 Despite being referenced within PPG as "*appropriate data*" for use in undertaking viability assessments, Keppie Massie consider that RICS BCIS construction cost data is not an appropriate basis for the assessment of construction costs for the EVA. 38

39 11.41 EVA Paragraph 5.40 states that the adopted construction costs have been prepared by Keppie Massie's own quantity surveyor (QS) and their methodology and cost assessments are contained within EVA Appendix 5. 39

11.42 The QS Report at EVA Appendix 5 states that Keppie Massie has knowledge of data from the St Helens local market through their provision of economic viability advice to the Council since 2011. Despite this, no evidence is provided of the cost data that Keppie Massie states has been compiled in St Helens.

11.43 It is stated within the EVA that due to confidentiality issues, no detailed or summary information is provided to support the costs which are adopted. Such information is regarded as highly pertinent and necessary to support the adopted cost.

39 11.44 With no data source evidence provided, the adopted costs are regarded as inappropriate and non-compliant with PPG requirements. EVA Paragraph 2.9 states that "*our construction cost database is considered to provide a more reliable and transparent source of local build cost data [than BCIS] for St Helens*". Rather than being transparent, the cost assessment adopts a 'black box' approach, which is regarded as highly inappropriate. It does not represent appropriate available evidence. 39

11.45 EVA Appendix 5 offers very little clarity in respect of the generic construction costs, in particular. Whilst costing methodology is provided, no figures are provided to explain the rates adopted for base construction costs, preliminaries, external works or garages.

39 Only total costs for all costs including professional fees and contingency are provided at Appendix B of EVA Appendix 5. It is not possible to determine the level of construction costs, preliminaries, external works or garage costs. 39

- 11.46 The information is effectively provided on a 'black box' basis, offering no transparency. As a result, the EVA does not comply with PPG for Viability, which at paragraphs 8 and 10 states that transparency is required in respect of viability appraisal assumptions. A revised QS report is requested, to provide the necessary transparent detail to enable appropriate stakeholder review and engagement.
- 11.47 In contrast to the generic sites, the specific allocations are assessed in some detail within Appendix D of EVA Appendix 5. It is not clear why detailed assessments have been provided for site allocations but not generic sites.
- 11.48 On reviewing the site allocation costings, it appears that the base construction costs (substructures and superstructures) run at variable rates, with lower costs applied to larger schemes. The adopted costs are regarded by Peel as extremely low and insufficient to reflect the costs incurred by national housebuilders in the construction of standard unit types.
- 11.49 For example, base costs plus preliminaries for the 2,988 unit Bold Forest Garden Suburb equates to £72.27 psf whilst the 569 unit former St Theresa's Social Club costs equate to £76.72 psf.
- 11.50 Peel is of the opinion that the adopted site allocation construction costs are unachievable and unevidenced. It is not surprising that Keppie Massie determine that BCIS data has limitations, as the costs adopted by Keppie Massie fall very significantly below BCIS median and lower quartile levels, which are currently presented at levels for "Estate Housing Generally" at £1,190 psm (£110.55 psf) and £1,052 psm (£97.73 psf) respectively. Based on their ongoing engagement with national housebuilders, Peel regards the absolute minimum base construction costs plus preliminaries to require £90.00 psf. Schemes will be undeliverable at costs below this level in current market conditions. 39
- 11.51 The reduction in costs adopted for larger schemes is not evidenced, and does not reflect market conditions. A scheme of circa 3,000 units is likely to be built by a member of national housebuilders (unlikely to exceed four) whereas smaller schemes of 200+ units will also be built by national housebuilders. Each national housebuilder will achieve ongoing economies of scale through standardisation of produce and bulk buying, yet there is no reason why the largest schemes will generate further cost savings. 39
- 11.52 EVA Table 5.4 defines the Generic Greenfield Testing – Site Opening Up Costs with a range from £3,000 - £8,300 per dwelling dependent upon the scale of the scheme. No evidence is provided to support the adopted costs, which is inadequate. Supporting justification and evidence must be provided.
- 11.53 In respect of abnormal costs, unstated allowances appear to have been made within the EVA in respect of brownfield generic sites. The lack of transparency is

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inappropriate and detailed information in respect of adopted abnormal costs are requested.

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- 11.54 Peel request that further reasoning and methodology should be provided in respect of previously developed and greenfield site abnormal costs to ensure that the viability appraisals are carried out on a reasonable and equitable basis for all sites.
- 11.55 A S106 contribution of £1,000 per dwelling is referred to in EVA Paragraph 5.54. As noted earlier in this representation, there is no evidence provided to demonstrate that this rate is appropriate. Evidence from previous developments should be provided by the Council to corroborate the level of S106 contribution.

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Developer's Profit and Overhead

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- 11.56 Profit level is set out within EVA Paragraph 5.68 as equating to 17.5% of GDV applied to smaller housing schemes of 10 or less dwellings. For scheme assessments which include no on-site affordable housing, Peel regards the proposed level as low, overstating viability in comparison with the widely accepted minimum industry profit level of 20% of GDV.
- 11.57 EVA Paragraph 5.76 states that, in the context of most forms of commercial development, the developer will typically seek a profit requirement of approximately 15% on cost. This figure was applied to all forms of non-residential development for testing and is regarded as insufficient, falling below the widely accepted commercial profit requirement equating to 20% on cost.

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Viability Testing Results

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Residential

- 11.58 EVA Tables 6.1-6.18 summarise the outputs of the viability appraisals for the generic typology schemes. The results of the site specific allocations are displayed in EVA Table 6.19 and at EVA Appendix 6. The commercial results are summarised within EVA Table 6.20.
- 11.59 Development in the lowest value area (Zone 1), which contains a nil affordable housing requirement for both brownfield and greenfield sites, is characterised as generally unviable on brownfield sites at all tested densities, and only demonstrating positive viability on greenfield sites at densities of 35 dph and above. A significant volume of the PS LP's identified development land supply (2,321 units) is proposed to be delivered in Zone 1 locations, and such delivery must be regarded as unviable on the basis of the Council's own EVA evidence base, indicating that the Council's housing requirement is unachievable.
- 11.60 Development on brownfield sites within the generic testing typologies begins to demonstrate positive viability within Zone 2 at a minimum density of 35 dph (and above). Similarly, Greenfield development only generally begins to become viable within Zone 2 at a minimum density of 35 dph. Only the smallest greenfield developments within Zone 2, at 10 dwellings or less, demonstrate positive viability at 30 dph.

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- 11.61 Within Zone 3, all sites (brownfield and greenfield) demonstrate positive viability at 30pdh and above, except for one brownfield scheme of 25 dwellings, with a marginally negative viability. The EVA determines that Brownfield sites can viably accommodate 10% affordable housing, with greenfield site at 30% affordable housing.
- 11.62 From the EVA Tables 6.1-6.18 it is clear that there is a differential between the results of the greenfield and brownfield appraisals, albeit the general assumptions are unchanged between the two categories of assessment.
- 11.63 This is regarded as inappropriate, with no support from Peel's experience in land transactions and market expectations.
- 11.64 Appropriate revisions to the greenfield land values will reduce the reported levels of viability.
- 11.65 Revisions to base construction costs applied in the EVA and clarity in respect of all wider cost inputs are required. Again, the results of site viability within the EVA will be reduced following the adoption of realistic and evidenced costs.
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Non-Residential

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- 11.66 EVA Table 6.20 (Commercial Viability Testing Results – Generic Typologies) presents negative viability results for Offices (Out of Town) (-£580 to -£734); Industrial B1/B2/B8 (-£19 to -£453); Retail (Comparison) (-£4 to -£68); and Hotel (-£348).
- 11.67 The only positive surpluses were established for Retail (Convenience) (£95 to £465) and an Industrial (B8) development of larger scale, demonstrating a £17 surplus.
- 11.68 The viability testing for commercial developments presents mixed results. The EVA states that development is unlikely to come forward on a speculative basis.
- 11.69 However, it is Peel's opinion that the current adopted profit (15% of costs). The EVA proposes that schemes will come forward solely where owner occupier driven, but this is not regarded as an appropriate basis to assess the overall level of achievable commercial delivery within the PSLP.
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Next Steps

- 11.70 Peel requests that the matters raised within this representation, in respect of the EVA, are addressed by Keppie Massie in their role as independent advisors to the Council. Updated evidence, in the form of an EVA addendum or update, should be published for formal stakeholder review and comment in advance of the Examination of the PSLP.
- 11.71 Critical to the success of producing this EVA addendum will be a further, meaningful process of industry engagement. Specifically, in accordance with PPG, it is Peel's request that Keppie Massie, acting on behalf of the Council, engage with landowners, promoters and developers to rectify stated concerns by effectively establishing and seeking to agree appropriate inputs into the EVA. Engagement to date has been insufficient to address the outstanding issues raised.

SUMMARY AND CONCLUSIONS

12. Conclusions and Proposed Changes to the PSLP

12.1 This report forms one of three papers which together provide Peel's representations to the PSLP. The three papers are as follows:

- Paper 1: Overarching representation (this paper)
- Paper 2: Assessment of housing needs
- Paper 3: Assessment of housing land supply

12.2 The three papers consider and provide comments on the following elements of the PSLP:

- The proposed employment and housing land requirement;
- The proposed housing land supply and whether this is sufficient to meet the proper Local Plan requirement;
- The distribution of residential allocations and whether this is in accordance with the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the Sustainability Appraisal;
- The Council's appraisal of Peel's land holdings at Haydock through the evidence base and the PSLP's treatment of these sites;
- The PSLP evidence base including the Sustainability Appraisal, Green Belt Review and Economic Viability Assessment

12.3 Critical points of soundness are raised in respect of the above areas. This representation has therefore identified the need for significant changes to the PSLP to correct its deficiencies and enable the Local Plan to proceed on a sound basis. In terms of the PSLP it is Peel's position that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;
- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;

- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process, reflected in an over provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most notably Haydock / Blackrock;
- The PSLP does not achieve an effective physical connectivity between housing and employment land (both existing and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most sustainable through the SA process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South ;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

12.4 These deficiencies collectively mean an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

12.5 As a result, the PSLP does not satisfy any of the four tests of soundness as presented below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the

Borough including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective co-location between residential and employment development as intended by the PSLP spatial strategy

12.6 In order to overcome these deficiencies and make these elements of the Plan sound, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

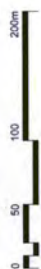
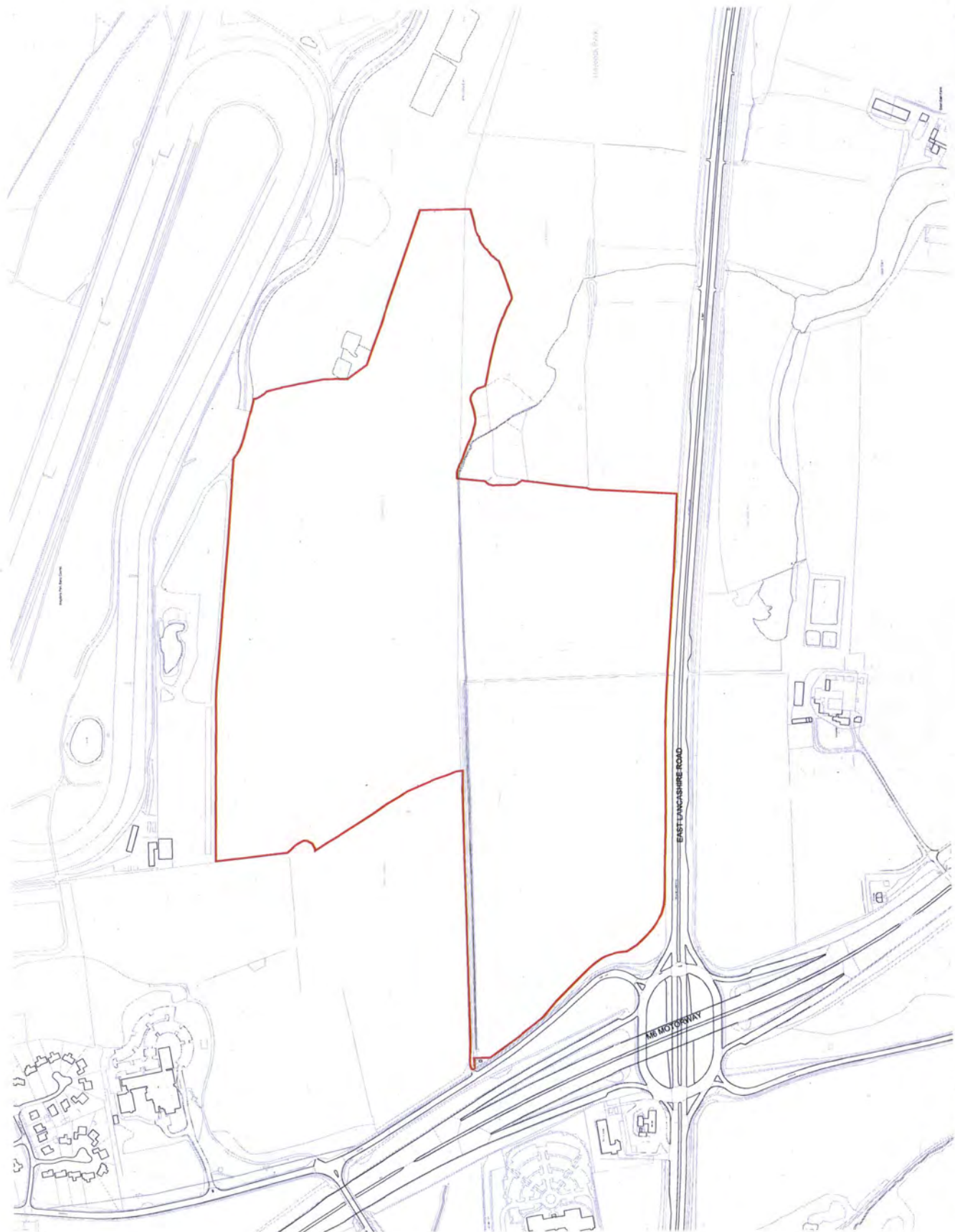
12.7 In the context of the above changes, this representation to the PSLP has demonstrated that Peel's sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport and highway benefits without affecting the strategic function of the Green Belt. In addition to the above changes, the following additional site allocations are also needed to address the soundness issues raised:

- Allocate land at Haydock Green for residential development during the plan period. Alternatively, the site should be allocated for employment development, or as a minimum as safeguarded land to meet employment land requirements beyond 2035;
- Allocate land at Haydock Point North for employment development during the plan period;
- Allocate land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

Appendix 1: Sites proposed for allocation by Peel



NOTES:
SUBJECT TO EXISTING COMPANY'S
PLANS AND SPECIFICATIONS. THE COMPANY
WILL BE RESPONSIBLE FOR OBTAINING ALL
NECESSARY CONSENTS AND APPROVALS
FROM THE LOCAL AUTHORITY.
DO NOT SCALE THIS DRAWING
FOR ANY PURPOSES.
THESE PLANS ARE THE PROPERTY OF
MICHAEL SPARKS ASSOCIATES
AND ARE NOT TO BE REPRODUCED OR
TRANSMITTED IN ANY FORM OR BY
ANY MEANS, ELECTRONIC OR MECHANICAL,
INCLUDING PHOTOCOPYING, RECORDING,
OR BY ANY INFORMATION STORAGE AND
RETRIEVAL SYSTEM, WITHOUT THE
WRITTEN PERMISSION OF MICHAEL SPARKS
ASSOCIATES.



01
001
SITE LOCATION
1:2500

REV	DATE	NOTE	BY	CHK



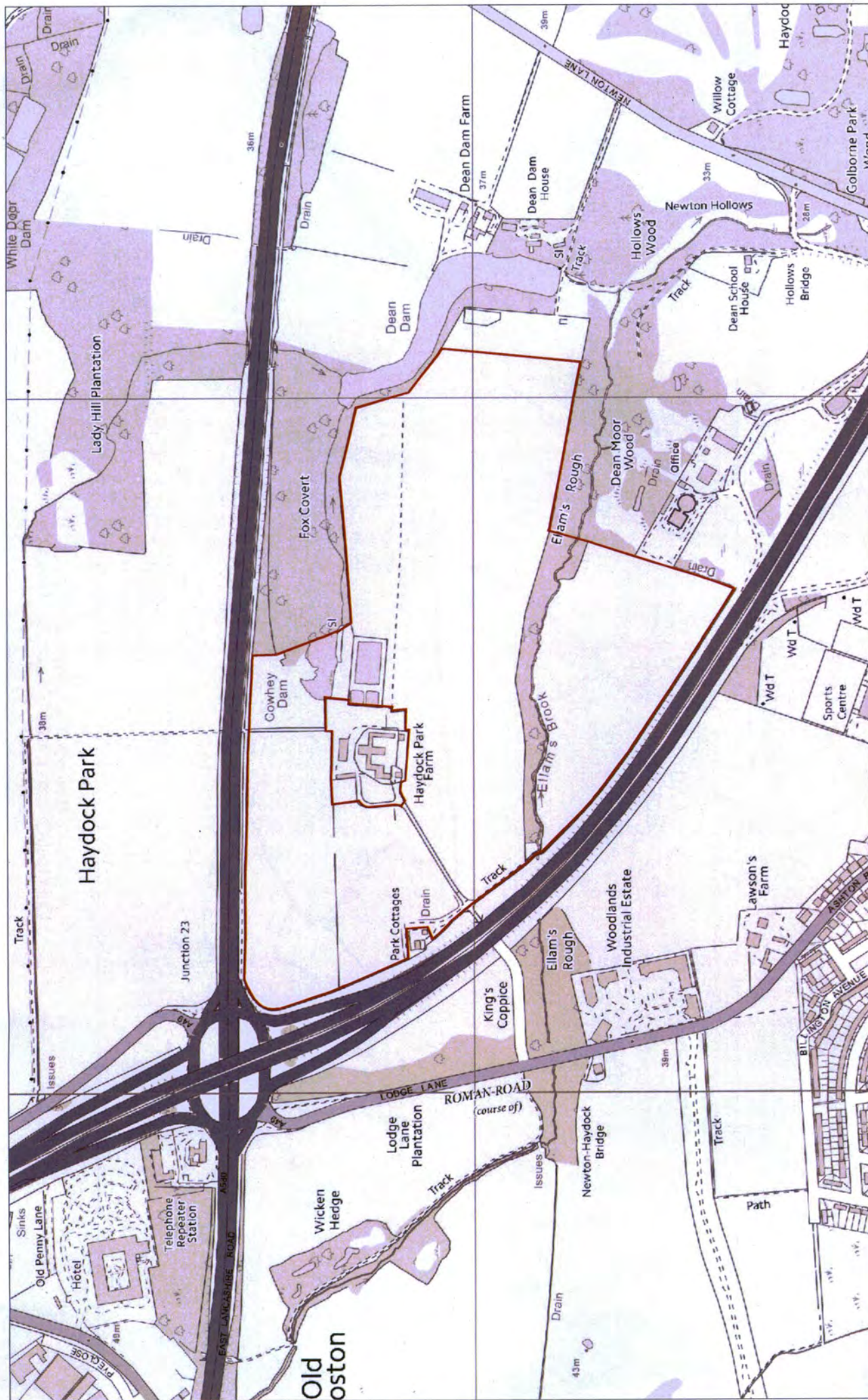
CHARTERED ARCHITECTS
11 PUGH PLACE
LEEDS LS4 4D
TELEPHONE 0113 278 4142
FAX 0113 278 4143
WWW.MSPARKS.CO.UK

THE
HAYDOCK POINT, HAYDOCK
SITING
SITE LOCATION PLAN

CLIENT
PEEL INVESTMENTS (NORTH) LTD

DATE	12/2000	SCALE	1:2500	DATE	12/2000
BY	SPARKS	FOR	FEASIBILITY	DATE	12/2000
BY	SPARKS	FOR	FEASIBILITY	DATE	12/2000

DRAWING NUMBER
30926-FE-001



Haydock South East
 Haydock Park Farm, off Lodge Lane
 South East of Junction 23 of the M6, Haydock
 St Helens



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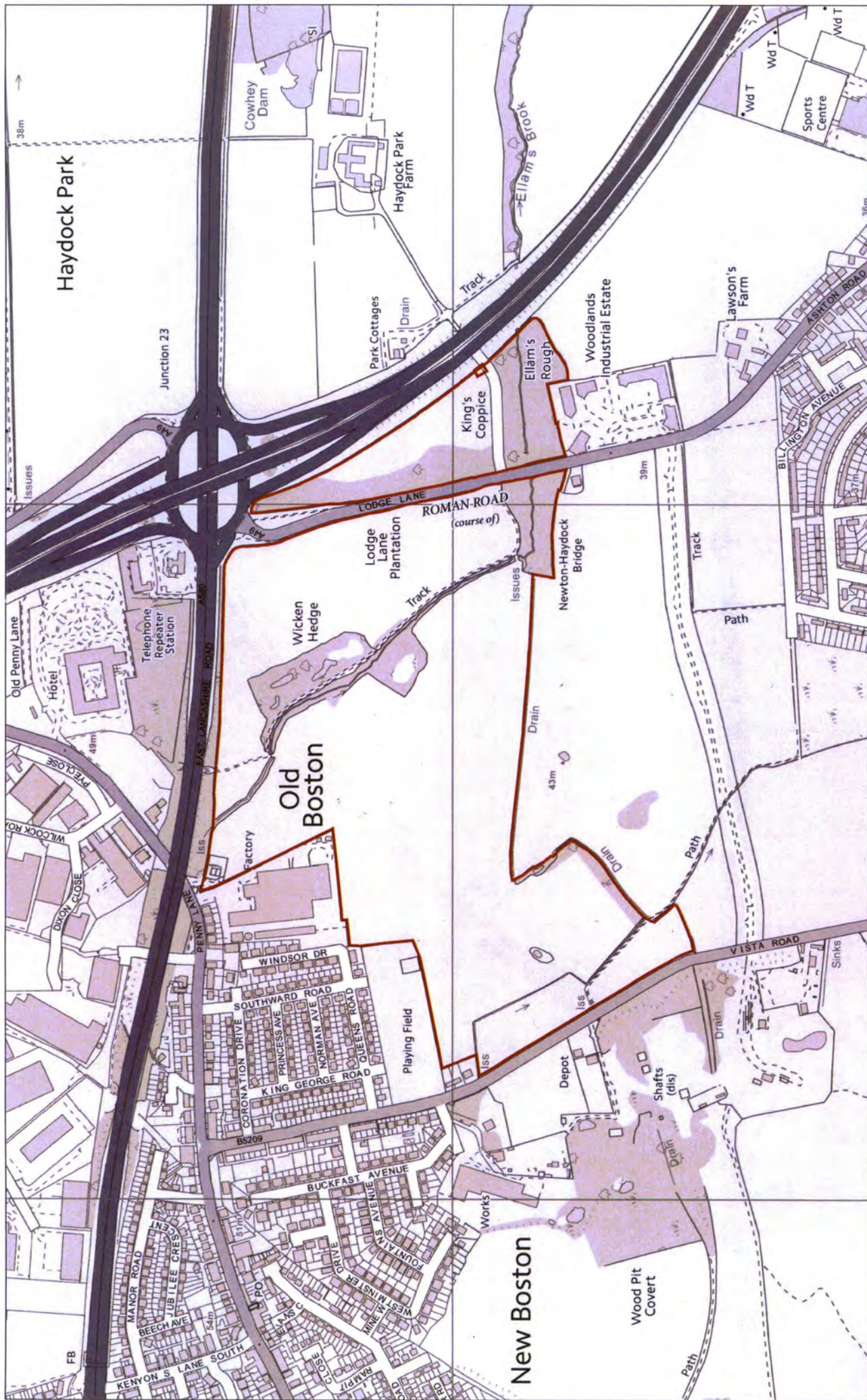
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Haydock South West
Land to the South West of Junction 23 of the M6
Vista Road / Lodge Lane
Haydock, St Helens

OS
Ordnance Survey
Developer Partner

OS 1000
Ref: 1000

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Appendix 2: Employment Land OAN report

Policy CPA04
(Points picked up
in Summary rep-
paper1)

St Helens Borough Local Plan 2020 – 2035

Submission Draft

Representations on behalf of Peel Holdings
(Land and Property) Limited

Review of St Helens' Objectively Assessed
Employment Needs

March 2019

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1. Introduction

- 1.1 This report has been prepared by Turley Economics, in collaboration with AMION Consulting and CBRE, on behalf of Peel Holdings (Land and Property) Limited (hereafter referred to as Peel) in response to the St Helens Borough Local Plan 2020-2035 Pre-Submission Draft (PSLP)¹ which was published for consultation in January 2019.
- 1.2 The report sets out Peel's representation to the Council's approach to employment land within the PSLP, providing specific comments on the requirements set out in Policy LPA04 'A Strong and Sustainable Economy' and updated evidence on the borough's objectively assessed employment land needs ('the OAN') as presented within the Employment Land Needs Study Addendum Report ('the ELNS Addendum')² published in January 2019.

Policy LPA04

- 1.3 Policy LPA04 sets the employment land requirement for the St Helens Borough, confirming the Council's aim of delivering a minimum of 215.4 hectares (ha) of land for employment development between 1 April 2018 and 31 March 2035 to meet identified needs and support the wider ambitions for economic growth established within the Plan. A total of 265.3ha of employment land is subsequently identified at Table 4.1 of the PSLP to meet this requirement. Of this total, 234.08ha of employment land is identified to meet the needs of St Helens Borough, with the remaining 31.22ha being allocated to meet employment land needs arising in Warrington.
- 1.4 Our contention is that the employment land requirement is now lower than that proposed in the Local Plan Preferred Options document³, which at the time it was consulted upon sought plan positively to deliver 306ha employment land to meet identified needs and respond to the growing levels of market demand anticipated at a sub-regional level. This was based on a residual requirement of 223.4ha over the period from 2012-2033, with an additional allowance of 70ha to reflect needs identified in the Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment (SHELMA)⁴.
- 1.5 Whilst Policy LPA04 within the PSLP is well intentioned, our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates, will not be as effective in facilitating the '*strong shift to B8 (storage and distribution) uses*'⁵ anticipated to occur over the Plan period, in turn constraining market demand and the wider achievement of local, sub-regional and national economic growth objectives.

¹ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019

² Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

³ St Helens Borough Local Plan 2018-2033 Preferred Options, St Helens Council, December 2016

⁴ Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, January 2017

⁵ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.5

Scope of the Report

- 1.6 This report has been prepared to review the OAN for employment land which informs the requirements established in the PSLP. It will be demonstrated that in the context of evidence clearly showing that a need and demand exists to exceed the level of employment development that the Plan currently intends to support over the Plan period, the OAN for employment land has been underestimated and the Council's approach is not justified.
- 1.7 Of particular concern is that:
- The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
 - The Council has failed to properly recognise the influences on past delivery rates, and the sectors driving employment growth over the different forecasting periods used to establish baseline needs.
 - Although the Council has accepted that it is appropriate to determine need partly by reference to current market demand it does not put a Plan in place which enables that demand to be satisfied. It therefore fails to satisfy its own assessment of need; and
 - The uplift of 25 ha to the previous major project related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 1.8 It follows that the residual requirements identified within Policy LPA04 will not be adequate or effective in meeting identified business needs over the plan period.

Structure of Report

- 1.9 The remainder of the report is structured as follows:
- **Section 2: The Assessed Need for Employment Land** – provides an overview of the ELNS Addendum and recommended employment land OAN;
 - **Section 3: Strategic Economic Drivers and Growth Aspirations** – provides an overview of the economic policy context and growth aspirations established by Government, the Liverpool City Region (LCR) Combined Authority and St Helens Council;
 - **Section 4: Impact of the Constrained Land Supply** – examines the influences of past policy approaches and land supply on take up and economic growth;
 - **Section 5: Drivers of Current and Future Logistics Demand** - examines the evolution of logistics market and implications for the supply of and demand for employment land in the North West.

- **Section 6: Review of the Employment Land OAN** – recommends an alternative employment land OAN for the borough taking into account the economic and market evidence presented in sections 3-5.
- **Section 7: Conclusions and Policy Implications** – sets out the implications of the recommended OAN for the requirements within Policy LPA04 of the PSLP.

2. The Assessed Need for Employment Land

- 2.1 The revised requirements set out within Policy LPA04 are derived from updated evidence on St Helens' employment land objectively assessed need (OAN) as set out within the BE Group Employment Land Needs Study (ELNS)⁶ and Addendum Report⁷.

Establishing the baseline requirement

- 2.2 The Addendum takes the same approach as the original ELNS, published in 2015, in determining the base requirement on past take up. It looks back over the period 1997 to 2017 and notes an average annual employment land take up of 4.5 ha during this period. This represents a slight reduction in the annual average take up rate presented within the 2015 study, which was based on 4.9ha/yr over the period from 1997-2015.
- 2.3 As with the 2015 ELNS⁸, the take up from 2011/12 to 2015 is judged not to fully reflect the need since land supply was considered to be constrained. This is confirmed at Paragraph 1.3 which confirms *"...from 2011/12 to 2015 there was a significant decline in employment land take up in the Borough, which was considered to be reflective of a lack of adequate market-attractive supply"*⁹.
- 2.4 More recent trends are reflected upon in Paragraph 2.8 which recognised that take up over the period from 2015/16 to 2016/17 *"continues to be low, limited by immediately available land supply"*¹⁰.
- 2.5 These trends are subsequently used in justifying an assessment of need based on take up between 1997 and 2012 (an annual average of 5.8 ha) with this period considered *"...to be a better representation of growth unencumbered by land shortages"*¹¹.
- 2.6 Within this period, the ELNS Addendum also notes that there was a particularly strong period of growth between 1998 and 2008, with an average annual take up of 7.5 ha during this period. However, this is not considered by the authors to be reflective of need over a full plan period as it would not take account of the typical peaks and troughs of economic cycles.
- 2.7 The employment land needs arising from these different take up assumptions are summarised in Table 2.1 below.

⁶ Employment Land Needs Study, Final Report, BE Group, October 2015

⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

⁸ Employment Land Needs Study, Final Report, BE Group, October 2015

⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 1.3

¹⁰ Ibid, paragraph 2.8

¹¹ Ibid, paragraph 2.19

Table 2.1: Summary of Employment Land Need Scenarios 2012-2037 (ha)

Scenario	Land need (incl. 5 year buffer)	Assumptions
Period 1997-2017	135.0	Based on 4.5 ha/yr
Period 1997-2012	174.0	Based on 5.8ha/yr
Growth period 1998-2008	225.0	Based on 7.5ha/yr

Source: ELNS, 2015 and ELNS Addendum, 2019

- 2.8 The ELNS Addendum identifies a lower average annual take-up of 4.5 ha and a consequential minimum adjusted requirement for the Local Plan period 2012 – 2037 (including a 5-year buffer) of 135.0ha of employment land. This falls below the previous lower estimate of 147.0 ha within the 2015 ELNS, and as a result widens the baseline estimate for 2012 – 2037 to 135 ha – 174 ha. The upper estimate of 174.0 ha (derived from the average from 1997 – 2012) remains unchanged.

Uplift to the base requirement

- 2.9 The ELNS Addendum also provides an updated assessment which purports to reflect the substantial growth seen in the large-scale warehouse market in the LCR since the last assessment was prepared.
- 2.10 Within this context the ELNS Addendum seeks to define a further land requirement arising from a number of additional influences, including the growth stimulus of ‘transformational developments’ planned for the LCR and the provisions of SHELMA¹². It is noted that the latter draws upon evidence from a report prepared by GL Hearn on B8 Land Use Forecasts for the LCR which forecasts a land requirement to meet large new-build warehouse space needs under the ‘do something’ scenario of 321 ha by 2033 and 512 ha by 2043 within the City Region. This is identified as equating to a land requirement in St Helens of 51 ha by 2033 and 82 ha by 2043 based on its share of total B8 floorspace in 2014, which was equivalent to 16%¹³.
- 2.11 The ELNS Addendum subsequently increases the assessment of need to meet demand from major projects from 30 – 40 ha to 55 – 65 ha (+25 ha). Although the precise increase is not clearly explained, it is justified on the basis of *‘the sustained strength of the market, the growing momentum around sites in St Helens, particularly around Haydock, the reporting of further land requirements at the LCR level and the potential earlier start of the Parkside SRFI’*¹⁴.
- 2.12 Taken in combination, the Addendum identifies forecast employment land needs of between 190ha and 239ha between 2012 and 2037, with the upper end of this range

¹² Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn on behalf of the LCR Combined Authority, March 2018

¹³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.14

¹⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.21

recognised as being “a better representation of the actual growth level if the market is without significant land supply constraints”¹⁵

Table 2.2: Updated Employment Land Needs 2012 - 2037

	Ha
Baseline (land take-up scenario)	135-174
Additional land demand major projects	55 - 65
Total Employment Land Needs	190 – 239

Source: ELNS Addendum, 2019

Limitation of the current approach

- 2.13 Using a land take-up scenario to estimate the baseline employment land needs figure is considered to be a reasonable approach in principle. It is critical, however, that:
- the most representative past take-up rates are applied,
 - there is recognition of the influences on those past take-up rates,
 - the balance between the application of past-take up and other considerations is appropriate; and
 - ultimately, the preferred basis for forecasting future needs is proportionate and based on a scenario that could realistically be expected to occur.
- 2.14 It is accepted within the ELNS Addendum that the relative lack of adequate market-attractive supply has had a disproportionate effect on take up levels post 2012 and therefore take up rates during the period from 1997-2017 are unlikely to be fully representative of future needs. However, in examining the appropriateness of the preferred scenarios, namely take up driven needs derived from the period 1997-2012, those same (and other relevant) considerations are not applied. There is no consideration given to wider economic and market influences and trends over this period, to evaluate how reasonable it is to utilise this scenario as the baseline for assessing future needs.
- 2.15 It is also of note that the upper end of the 55-65 ha allowance for additional land demand arising from major projects broadly reflects St Helens taking a 16% share of the SHELMA derived need for 397 ha of land for large scale B8 development across the LCR between 2012 and 2037, as referenced within the PSLP¹⁶. This need was derived from a bespoke forecasting model based on freight throughput generated from major infrastructure investment and replacement demand. It is unclear, however, the extent to which this requirement is informed by wider market trends including e-commerce related demand.

¹⁵ Ibid, paragraph 2.22

¹⁶ St Helens Borough Local Plan 2020-2035 Submission Draft, St Helens Council, January 2019, paragraph 4.12.11

- 2.16 It is also unclear, through its' subsequent translation into Policy LPA04, the extent to which the 65 ha allowance it is truly reflective of St Helens meeting *"a substantial proportion of the sub-regional need for large scale B8 uses identified to date within the FEMA as a whole"*¹⁷, as purported in the Plan.
- 2.17 Our contention, therefore, is that:
- The baseline requirement is under-estimated, with the Council placing too much reliance on past delivery over the period from 1997 to 2012 as an indicator of future need;
 - The Council has failed to properly recognise the influences on past delivery rates, particularly land supply constraints and the sectors driving employment growth over the different forecasting periods used to establish baseline needs;
 - Although the Council has accepted that it is appropriate to determine need partly by reference to current market demand it does not put in a Plan in place which enables that demand to be satisfied. It therefore fails to satisfy its own assessment of need; and
 - The uplift of 25 ha to the previous infrastructure investment related uplift (40 ha) is too low and does not reflect the SHELMA derived need and true market demand position over the short and medium term.
- 2.18 These issues and gaps in the evidence base are examined within sections 3 - 5 of this report with reference to:
- The strategic economic drivers and growth aspirations (section 3);
 - The impact of historic land supply constraints (section 4); and
 - Current and future drivers of logistics demand (section 5).
- 2.19 The appropriateness of the employment land OAN is subsequently examined (in section 6) in the context of the evidence presented.

¹⁷ Ibid, Paragraph 4.12.12

3. Strategic Economic Drivers and Growth Aspirations

- 3.1 The Local Plan is also being prepared against the backdrop of a strong level of economic investment and ambition – both nationally and across the north of England. The scale of ambition for the north has previously been articulated in the Northern Powerhouse Strategy, underpinned by a vision premised on creating a *“vibrant and growing economy, a flourishing private sector and a highly skilled population”*¹⁸.
- 3.2 At a national level, the Government’s goals and expectations for economic growth also remain clear and provide an important and positive investment context for the North West region, built around an aspiration to create a nationally resilient economy.
- 3.3 The Government continues to recognise that *‘improving productivity is vital to building an economy fit for the future’*¹⁹. To this end, boosting productivity and earning power throughout the UK represents the central aim of the Government’s Industrial Strategy white paper²⁰.
- 3.4 The Industrial Strategy explicitly seeks to transform the country’s economic geography through investment in infrastructure. This requires a more geographically balanced approach which links up people and markets to attract and target investment.
- 3.5 Of particular relevance in planning for employment land is the recognition that local insights are needed to develop clear, long-term strategies for the successful future growth of local economies.
- 3.6 This evidently forms a critical context for the preparation of the St Helens Local Plan which establishes a strong strategy to support regeneration and deliver balanced growth.
- 3.7 In response the PSLP recognises that in order to strengthen and grow the St Helens economy there is a need to build on those sectors where the borough enjoys a competitive advantage. The borough’s location and excellent transport connectivity are subsequently recognised as key economic attributes that offer the potential to increase its economic competitiveness, including in the growing logistics sector. This in turn is supported by a commitment to deliver new well-located employment land and floorspace²¹ and to capitalise on economic growth opportunities that this presents.

¹⁸ Northern Powerhouse Strategy, HM Government, March 2017, Foreword

¹⁹ Autumn Budget, HM Treasury, 2017, paragraph 4.3

²⁰ Industrial Strategy – building a Britain fit for the future, HM Government, 2017

²¹ Ibid, paragraph 4.12.1

Realising the Growth Ambition for the Liverpool City Region

- 3.8 It is also important to consider St Helens' strategy in the context of the growth plans for the wider Liverpool City Region (LCR), as referenced in the PSLP itself. The PSLP is clear in this context, stating that:

"St Helens Borough's economy is inextricably linked to that of the wider Liverpool City Region. The Council will continue to work alongside its City Region partners to take full advantage of the continued growth of the City Region and to help deliver the economic growth, job creation, and skills development aspirations outlined in the Liverpool City Region Growth Strategy (2016) and Strategic Economic Plan (2016)"²²

- 3.9 The LCR Growth Strategy confirms the intention to ensure *"the creation of over 100,000 additional jobs in the Liverpool City Region by 2040"*. It recognises that this growth will build upon a period of *"economic renaissance with a diversifying economy of internationally-oriented markets and businesses"*.

- 3.10 The Strategy goes on to acknowledge the LCR's Strategic Vision to be the:

'Global Logistics Hub for Northern UK and Ireland' and wider opportunity to support this vision via the "Development of a large portfolio (estimated at 400-500ha over 25 years) of logistics sites, multimodal facilities and buildings to fulfil demand generated from increased port based freight, retail and manufacturing logistics close to ports, airports and near major road and rail infrastructure"²³.

- 3.11 Delivery of SuperPort²⁴ is key to achieving this vision and is an unprecedented investment that will change the UK logistics market and generate net additional demand for logistics floorspace within the Liverpool City Region, and St Helens more specifically. The PSLP clearly identifies large scale logistics development as representing a key opportunity for St Helens, linked to its strategic location on the M6, as well as demand generated by SuperPort.

- 3.12 The economic role and potential of the LCR and the importance of the strategic employment sites, including those in St Helens, has previously been recognised by both Government and the LCR authorities in the Devolution Deal established for the City Region in 2015:

"Liverpool City Region has the opportunity, through devolution, to ensure it is at the heart of the Northern Powerhouse. With the River Mersey and the integrated cluster of logistics and expertise through SuperPort, the Liverpool City Region has unique economic assets that can help transform the Northern economy. In its growth plan, the City Region has a network of key strategic sites to driver forward business growth and commercial investments including 3MG in Halton, Knowsley Industrial Park, Atlantic

²² Ibid, paragraph 4.12.3

²³ Ibid, page 41

²⁴ A £1bn+ investment in an integrated cluster of logistics assets across the Liverpool City Region that will deliver faster, greener global market access for business to and from the northern UK and Ireland via an enlarged post-Panamax container port

*Park in Sefton, Parkside in St Helens, Wirral Waters and Stonebridge Cross in Liverpool*²⁵

- 3.13 The Growth Strategy²⁶ for the LCR sets out the scale of opportunity presented by the Devolution Deal. It asserts:

“Devolution provides us with an unprecedented opportunity to take control of our economic future, to build on recent success and to address the challenges before us”

- 3.14 The opportunities this presents for St Helens are widely acknowledged in the informing evidence base which recognises that the substantial growth forecast in the large-scale warehouse market in the LCR in coming years and the fact that *“St Helens, as an area with excellent access to the motorway network and key North West markets is well positioned to take a significant share of this market”*²⁷.

Implications for the employment land OAN

- 3.15 The growth aspirations of Government, the LCR Combined Authority and the Council, forms a critical context for the development of PSLP, the employment land OAN, and Policy LPA04 more specifically.
- 3.16 Provision of additional logistics infrastructure in St Helens represents a key priority in this regard, and has the potential to enhance economic growth, helping to deliver the stated ambitions of St Helens Council, the LCR and the UK as a whole.
- 3.17 This approach is also strongly supported, and is considered to align with the Government’s own national agenda and National Planning Policy relating to building a strong and competitive economy.
- 3.18 It is incumbent on the Council to ensure its Local Plan responds positively to the scale of ambition that has been established and planned investment. The Council must ensure that sufficient land of the right type is available in the right places and at the right time²⁸ to support the levels of growth envisaged. To do otherwise would be to constrain the economic growth potential of the borough.

²⁵ Liverpool City Region Devolution Agreement, HM Treasury / Liverpool City Region, November 2015

²⁶ Liverpool City Region Growth Strategy, 2016

²⁷ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.15

²⁸ National Planning Policy Framework, MHCLG, 2019

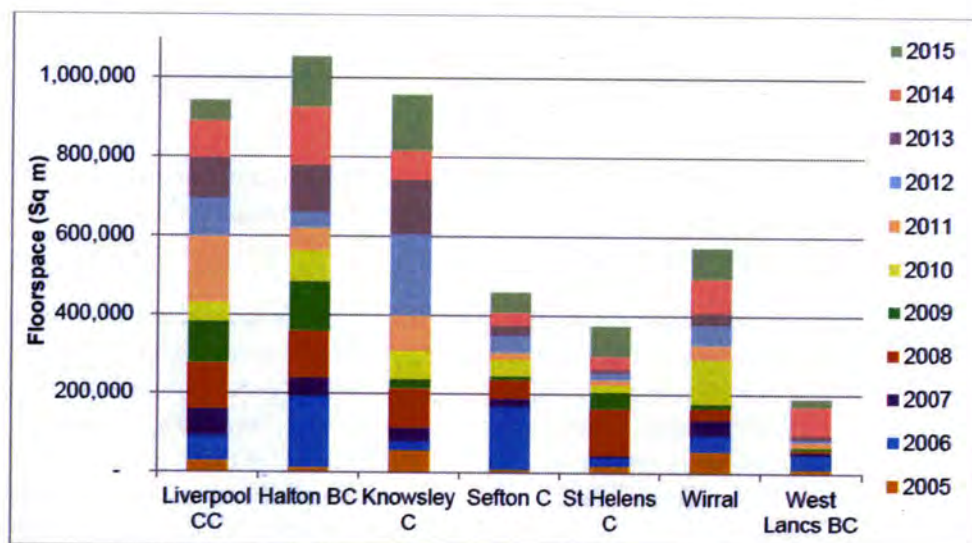
4. The impact of historic land supply constraints

- 4.1 As widely acknowledged in the evidence base, the borough's constrained land supply is considered to have acted as a significant constraint to economic growth and investment:

"...it is considered that employment land take-up in St. Helens has been suppressed for a significant number of years by an inadequate supply of market attractive sites. This is best illustrated by the experience of other authorities in the same functional economic market area...Halton, Liverpool, Knowsley and Wirral have all experienced significantly more take-up of employment floorspace than St Helens between 2005 and 2015"²⁹.

- 4.2 This is evidenced in the analysis of comparative take up presented within the LCR SHELMA³⁰ which shows St Helens recording the second lowest take up of industrial floorspace of the seven LCR authorities over this period. Take up from 2010 to 2014 is particularly low when compared to that experienced in Liverpool, Halton and Knowsley over the same period. This analysis also indicates that St Helens commanded a larger share of take up in the years before 2010, with 2008 being of particular note.

Figure 4.1: Take up of Industrial Floorspace by Year and Local Authority 2005-15



Source: GL Hearn, 2018

²⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.15, paragraph 2.11

³⁰ Draft Liverpool City Region Strategic Housing and Economic Land Market Assessment, GL Hearn, March 2018, Figure 34

4.3 Recognising the above constraints, this section considers the relationship between land supply and the historic performance of the St Helens economy over the different time periods used for forecasting future employment land needs within the ELNS Addendum; namely:

- 1997-2012;
- 1998-2008; and
- 1997-2017.

4.4 The wider implications of this constrained land supply position are then established with reference to take up trends in both St Helens and Warrington, which is considered to represent a relevant comparator area given its adjacency and comparable relationship with the motorway network which acts as a key influence on logistics locational demand.

Local Plan Context

4.5 Policy direction over much of the 1997 to 2017 period was provided by:

- the adopted St Helens Unitary Development Plan (UDP)³¹ that was adopted in July 1998 and amended by the Secretary of State in 2007;
- The North West of England Plan Regional Spatial Strategy to 2021, until this was revoked in 2013.
- the St Helens Core Strategy³² that was adopted in October 2012 and relevant Saved Policies of the 1998 St Helens Unitary Development Plan (the current development plan until such time that the new Local Plan is adopted).

4.6 It is notable that the principal underlying strategy of the UDP was urban regeneration. A key economic aim in support of this was *"to promote new economic activity in order to diversify and expand the existing industrial base and provide future job opportunities"*³³. To support this objective the UDP allocated circa 194ha of land for employment development across 52 sites. The majority of these sites were small sites under 3 ha. Larger scale employment related investment was largely focussed in the Southern Corridor – building on opportunities created by the M62 link – and at the existing Haydock Industrial Estate.

4.7 The status afforded to these locations was carried forward into the Core Strategy³⁴ which prioritises as part of the overall vision established for St Helens that *"Previously developed land in sustainable locations within Haydock Industrial Estate and the M62 Link Road Corridor will remain priority areas for economic development"*³⁵.

³¹ St Helens Unitary Development Plan, St Helens Borough Council, 1998

³² St Helens Core Strategy, St Helens Borough Council, 2012

³³ St Helens Unitary Development Plan, St Helens Borough Council, 1998, page 17

³⁴ St Helens Core Strategy, St Helens Borough Council, 2012

³⁵ Ibid,

- 4.8 The opportunity presented by the creation of a new Strategic Rail Freight Interchange at Parkside also features as a key part of the borough's economic vision, but to date has not been realised with delivery now expected during the Plan period.
- 4.9 The influence of this economic and policy context is considered in more detail below with reference to the planned supply of employment land and historic performance of the St Helens economy over the period from 1997 to 2017.

Historic land supply in St Helens

- 4.10 The St Helens Unitary Development Plan (UDP)³⁶, which was adopted in 1998, allocated circa 194ha of land for employment development, with these allocations making up the majority of the area's supply that was delivered between 1997 and 2012.
- 4.11 Policy S2 of the UDP outlined the Council's justification for the quantum and land characteristics of the allocated employment sites. It is stated that the period 1980-1993 was characterised by a generally low level of industrial land take-up in St Helens, with this averaging out at 2.36ha per annum, which was well below the Merseyside Structure Plan allocation of 10.28ha per annum. This low level of take up was attributed to lack of demand, depressed rental levels, competition from elsewhere (such as Warrington); and a lack of quality sites. The UDP did, however, state that regeneration schemes and new transport links would contribute to an annual demand exceeding 2.36 ha during the plan period.
- 4.12 Whilst the Council recognised the need to improve the range and quality of the area's industrial land base, it was acknowledged that *"the majority"* of the UDP's allocated employment sites were:
- "Contaminated, small, unattractive, lacking basic infrastructure or remote from the strategic highway network"*³⁷.
- 4.13 It is evident that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development; although eleven sites were allocated that were larger than the 5ha required to deliver at least one strategic scale logistics building, very few had the necessary attributes (such as suitable motorway accessibility) to meet the occupier requirements for this use.
- 4.14 The UDP identified three sites in St Helens of 'strategic significance' at Lea Green Farm (5Ec1a) Millfield Point 23 (2Ec1) and Rainhill Hospital (5Ec10) *'to enable St Helens to compete with other regions for inward investment'*³⁸.
- 4.15 The Southern Corridor and Haydock Industrial Estate were identified as the areas of the borough where warehouse and distribution (i.e. logistics) development was to be encouraged.

³⁶ St Helens Unitary Development Plan, St Helens Council, 1998

³⁷ *Ibid*, p45

³⁸ *Ibid*, p46

4.1 The largest allocation made was the Lea Green Farm site, which at 25.64ha, enabled the development of Co-operative Group distribution centre (605,920 sq ft) in 2002/03. The large scale redevelopment of the Shell Terminal Site preceded this in the mid 1990's with the development of major distribution centres by Sainsbury's (250,000 sq ft), Booker (who leased 407,000 sq ft upon the unit's completion in 1996. The building is currently listed by CoStar as covering an increased 439,759 sq ft) and The Book People (82,000 sq ft). An extension to the Sainsbury's distribution centre was subsequently completed in 2010, with the facility now providing approximately 641,000 sq ft of logistics floorspace. These schemes were, however, the exception rather than the norm, with the majority of take up elsewhere in the borough being much smaller in scale.

4.2 The limited amount of large scale logistics development is noted within the ELNS Addendum, which confirms that:

*"the last large scale B8 site taken up in St Helens was the 15.66ha Somerfield/Co-op distribution facility (56,290 sq m/605,920 sq ft) in 2002/03 and since then, whilst there has clearly been market demand, as illustrated in the high take up rates in Warrington, there has not been an adequate supply of market attractive sites in St Helens"*³⁹

4.3 Notwithstanding this, the take-up and success of the developments evidences that demand for larger scale logistics units evidently did exist and was accommodated in the 5 years following the adoption of the UDP, despite the Plan making only minimal provision to accommodate the needs of the sector.

4.4 The relative absence of a market attractive supply of large scale sites post 2002/03 raises questions as to the representativeness of a baseline employment land need estimate which is derived from take up in the years 1997 to 2012.

Historic performance of the local economy

4.5 The influence of land supply is also evident in the historic economic performance over the period from 1997 to 2017. Table 4.1 shows trends in St Helens, the Liverpool City Region (LCR) and UK based on overall rate of employment growth, for the various time periods considered in the ELR Addendum using Experian data.

4.6 This shows that over the period from 1997-2012 the borough witnessed a comparatively low level of employment growth - just 0.2% per annum, compared to 0.5% and 1.0% across the LCR and wider UK. Importantly this largely reflects the scale of growth over the period from 1997 to 2017, which BE group highlight as being less representative of future needs due to the land supply constraints it says were in evidence beyond 2012.

4.7 In contrast, the relatively strong local performance in the 1998-2008 period is evident, with St Helens (0.9% per annum) performing better than the LCR (0.8% per annum).

³⁹ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, para 2.12

Table 4.1: Employment Change – St Helens, LCR and UK (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	0.2%	0.9%	0.2%
LCR	0.3%	0.8%	0.5%
UK	0.7%	1.0%	1.0%

Source: Experian

Sectoral employment change

4.8 As shown in Table 4.2 below, the sectors that grew most significantly, in terms of employment, over the various periods were:

- administrative and support services;
- health;
- land transport, storage and post (which is taken to represent the logistics and distribution sector); and
- professional services.

Table 4.2: St Helens – sectoral employment change (% per annum) – Growth sectors

Sector	ELNS Take up Scenario periods					
	1997-2012		1997-2015		1998-2008	
	No.	%	No.	%	No.	%
Total	1.8	0.2%	2.7	0.2%	6.3	0.9%
Administrative & Supportive Services	3.8	5.6%	4.3	5.1%	2.1	4.8%
Civil Engineering	0.2	2.7%	0.1	1.2%	0.3	5.2%
Computing & Information Services	0.2	2.7%	0.2	2.3%	0.1	1.7%
Education	0.9	1.2%	0.9	1.0%	1.3	2.3%
Health	0.9	2.4%	1	2.2%	0.9	3.3%
Land Transport, Storage & Post	2.5	3.5%	2.6	3.0%	2.9	5.4%
Media Activities	0.2	2.7%	0	0.0%	0.1	2.0%
Professional Services	0.3	0.7%	0.5	0.9%	0.2	0.6%
Public Administration & Defence	0.6	1.5%	0.2	0.4%	0.9	2.9%
Real Estate	0.5	5.6%	0.8	6.3%	0.6	8.7%
Residential Care & Social Work	1.4	2.2%	1.3	1.7%	1.1	2.5%
Specialised Construction Activities	0.4	0.9%	0	0.0%	1.6	4.3%
Utilities	0.5	8.7%	0.7	8.7%	0.2	6.5%
Wood & Paper (manufacture of)	0	0.0%	0.1	1.2%	0	0.0%

Source: Experian

- 4.9 The table below shows the annual employment growth rates for the land transport, storage and post sector over the various scenario periods for St Helens, LCR and the UK. The strong relative performance of St Helens is evident, reflecting its locational strengths compared to the wider LCR. The noticeably higher growth in the period 1998-2008 is also apparent with employment growing by 5.4% compared to just 2.2% growth across the wider LCR over the same period.
- 4.10 It is also of note that employment growth over the period from 1997 to 2012, at 3.5%, is almost 2% lower. A similar growth rate is evident over the period from 1997 to 2017; a period which is discounted from further consideration within the ELNS Addendum, and which evidently does not reflect the positive growth strategy now being taken forward in the Plan.

Table 4.3: Land transport, storage and post sector employment change (% per annum)

	1997-2012	1998-2008	1997-2017
St Helens	3.5%	5.4%	3.9%
LCR	1.4%	2.2%	2.5%
UK	1.2%	1.4%	1.7%

Source: Experian

Impact of positive planning in Warrington

- 4.11 The impact of planning more positively to accommodate a higher rate of take up can be evidenced with reference to employment land take up in Warrington. Warrington benefits from similarly strong connectivity to that of St Helens, with both boroughs being well placed in relation to the Liverpool and Manchester City Regions and benefitting from direct motorway access.
- 4.12 Warrington's 2016 Economic Development Needs Study (EDNS)⁴⁰ assessed that during the period 1996 to 2016, a total of 293ha of employment land was developed, averaging 14.65ha per annum⁴¹. A key contributor to employment floorspace in Warrington is the Omega site, which the EDNS reports as having alone delivered circa 110 ha of employment land up to 2016, with over 100ha of this being developed in the three years 2013/14 – 2015/16.
- 4.13 The EDNS states that *"the success of Omega over the last three years has been a key feature of the local economy"*⁴². Although at the time of the assessment 69.68 of land remained available for development at Omega the study notes that:
- "The market for larger B2 and B8 premises remains strong and most of the remaining undeveloped land is likely to be taken up by such operations, including much of the land currently consented for B1 options"*⁴³.
- 4.14 Warrington's 2017/18 Annual Monitoring Report⁴⁴ identifies that Omega contributed significantly to the monitoring period's quantum of new employment floorspace (which totalled 4.26ha of land), this albeit falling behind the previous monitoring period's total of 8.08ha.

⁴⁰ Warrington Borough Council (2016) Economic Development Needs Study

⁴¹ Ibid. pp. 138-139

⁴² Ibid. p4

⁴³ Ibid. p77

⁴⁴ Warrington Borough Council (2019) Annual Monitoring Report 2018 (Monitoring period: 1st April 2017 – 31st March 2018)

Warrington Unitary Development Plan 2006

- 4.15 This scale of development was evidently facilitated through the allocation of circa 440ha of land for employment use⁴⁵ in the 2006 Warrington UDP, with specific provision being made for strategic scale logistics development. Omega was recognised as a 'Regional Investment Site', and was afforded a separate allocation of 130ha land by Policy EMP2 of the UDP (this being in addition to the 310ha allocated in the rest of the borough by policy EMP1), with the aim of delivering "*high quality strategic business developments*"⁴⁶.
- 4.16 The justifications for UDP policies EMP2 and EMP3 (the latter of which provided supplementary justification as to the provision of land for economic development) further highlight that the development of the Omega site serves to provide opportunities for growth in priority sectors whilst addressing known sub-regional economic weaknesses, such as low business stock growth and high unemployment.

Warrington Core Strategy 2014

- 4.17 Warrington's 2014 Core Strategy continues to identify Omega as a key supply of strategic employment land. Core Strategy Strategic Proposal policy CS 8 highlights that Omega will "*contribute to economic opportunity and growth in the wider sub region*", affirming that "*proposals to develop the strategic location which seek to develop the remaining extensive and open areas of each site in a piecemeal or disjointed manner*" will not be supported⁴⁷. Core Strategy policy 'PV 1: Development in Existing Employment Areas' similarly states that major warehousing and distribution developments will be primarily directed towards existing preferred locations, one of which being Omega⁴⁸.

Emerging Warrington Local Plan

- 4.18 It is notable that the Warrington Local Plan Preferred Development Option Regulation 18 consultation document⁴⁹ continues to plan positively in setting a land requirement of 381ha over the period 2017 – 2037⁵⁰. This averages to just over 19ha per annum, exceeding annual average take up of 14.65ha witnessed in the borough between 1996 and 2016. This need is directly reflective of the strong demand generated by previous local plan allocations and the ensuing market confidence that this has created.

⁴⁵ Ibid. pages. 22-23. The 440 ha of allocated employment land comprises the total land allocated by UDP policies EM 1: Employment Development and EM 2: Omega South: Regional Investment Site.

⁴⁶ Ibid

⁴⁷ Ibid. page 36

⁴⁸ Ibid. page 50

⁴⁹ Warrington Local Plan Preferred Development Option Regulation 18, Warrington Borough Council, 2017

⁵⁰ Ibid, p6

The current planned supply in St Helens

- 4.19 Notwithstanding the scale of demand and take up in Warrington, it is notable that comparable strong take up rates are already in evidence on large scale logistics sites currently under construction in St Helens.
- 4.20 The level of developer interest and activity in St Helens is commensurate with growing levels of market demand, acknowledged above and within the ELNS addendum, which notes that:
- “Discussions with commercial agents in the North West show a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation. Indeed, the market is showing signs of being constrained, not by lack of demand but through lack of space. High quality, large, flat sites with excellent access to the motorway network and with planning support are in very short supply. Specifically, on the door step of St Helens, as the current stage of Omega Warrington is built out, there is a need for further large-scale logistics sites to be provided near the intersection of the M6 and M62”.*
- 4.21 It is of note that *“planning permissions in St Helens represent some of the largest permissions in the market in the North West, very much positioning Haydock at the forefront of the large warehousing market in the region”⁵¹*, and where supply is available, the demand and take up of such sites can escalate significantly.
- 4.22 Of particular note within this context, are the developments coming forward on two of the large scale allocations within the PSLP:
- **Site 2EA, Florida Farm North, Slag Lane, Haydock.** This site is proposed to be allocated to provide 36.67 ha of B2 and B8 use. The site benefits from planning permission for 1,452,600 sq ft (135,000 sq m) and in September 2018, Amazon took a 360,000 sq ft unit on design and build basis. A speculative unit comprising 523,500 sq ft of floorspace is currently under construction and due for completion in June 2019. This leaves just 5 acres (2 ha) available for development.
 - **Site 3EA, Land North of Penny Lane, Haydock.** This site is allocated to provide 11.05 ha for B2 and B8 use. Again, the site benefits from planning permission for 498,639 sq ft, consisting of two buildings of 372,866 sq ft (34,653 sq m) and 125,773 sq ft (11,689 sq m). In 2018, Movianto acquired 371,000 sq ft in what was the largest deal in the North West during 2018.
- 4.23 With occupier and investor activity now well established on both of these sites, it is anticipated that both allocations will be fully developed in the early years of the plan. This will remove around 47.8 ha (gross) from the borough’s employment land supply, whilst at the same significantly reducing the choice of large scale sites available to meet the market requirements over the remainder of the Plan period.

⁵¹ Ibid, paragraph 2.7

- 4.24 Their delivery could also further increase take up rates. As an illustration, assuming a 40ha net developable area, the delivery of both sites within 5 years would see average annual take up of 8 ha per annum. However, in the context of strong market demand it is anticipated that both sites would potentially be fully developed over a short time frame. Average take up of 13 ha per annum could be expected on these sites alone if delivered over 3 years for example.

Implications for the employment land OAN

- 4.25 The logistics sector has previously been a key driver of employment growth in St Helens, contributing to the above trend employment growth witnessed over the period from 1998-2008. This is a trend which forecast to continue through the implementation of the Plan's growth strategy.
- 4.26 The analysis undertaken has clearly demonstrated the consequential impacts of employment land supply on past employment take up rates and economic growth in St Helens. It is also of note that the less constrained land supply and more supportive policy context in Warrington directly contributed to the development of an average of over 300% more employment land per annum (at an average of 14.65 ha per annum from 1996 to 2016) than was witnessed in St Helens over a similar 20 year timeframe (4.5 ha per annum from 1997 to 2017). It therefore follows that without such land supply constraints, and a supply of market attractive sites, take up rates in St Helens could have been much higher, as is now being evidenced by the take up rates being observed on sites which have recently been approved for development.
- 4.27 The PSLP and its informing evidence base recognise the ongoing contribution of the sector as a driver of future economic growth⁵². On this basis, trends over the growth period from 1998 to 2008 are considered to better reflect the levels of activity in the logistics sector now being experienced, and therefore are considered to be more representative of baseline needs for the purposes of establishing the employment land OAN.
- 4.28 The period 1998 to 2008 is also considered to be superior and more representative of the market potential of St Helens than the other scenario periods, which have been shown to be constrained by historic land supply.

⁵² Ibid, paragraph 2.6

5. Drivers of current and future logistics demand

- 5.1 The Council's evidence base is clear in acknowledging that the large scale warehousing market is the most likely sector to drive growth in St Helens and the broader North West region in years to come⁵³.
- 5.2 As set out in section 3, accommodating the needs of this sector through the provision of large scale logistics sites represents a key part of the borough's economic strategy to capitalise on the opportunities presented by this sector and contribute positively to local and wider city region economic growth.
- 5.3 This focus is fully supported by Peel. Our contention is that whilst the Council has accepted that it is appropriate to determine its employment land requirements partly by reference to current market demand it has not put in place a Plan that will satisfy that demand.
- 5.4 This concern is evidenced with reference to up-to-date logistics market research prepared by CBRE and provided at Appendix 1. This market evidence illustrates St Helens within its wider market context, highlighting the evolving and significant scale of demand in excess of that currently being planned for within the PSLP.
- 5.5 Of particular note within this context is the:
- the continued growth in logistics take up and e-commerce driven demand;
 - the increasing demand for larger scale units in response to changing business and consumer demand;
 - the paucity of floorspace availability to meet demand in prime development locations across the North West; and
 - the constrained and diminishing supply of large scale logistics sites.
- 5.6 These trends are explored in more detail below.

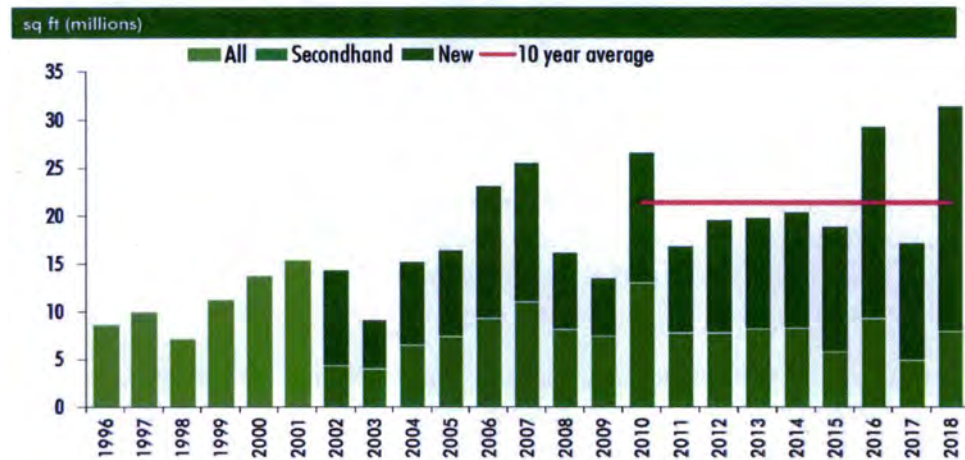
E-commerce drives logistics take-up to unprecedented levels

- 5.7 Take up across the UK hit a record high in 2018. At 31.50m sq ft on 101 deals, take up was 82% higher than 2017 and exceeded the previous annual record from 2016 of 29.35m sq ft. The new long term average take-up for the UK is now 21.47m sq ft per year⁵⁴.
- 5.8 The below chart illustrates trends in the take-up of large scale logistics floorspace in the UK since 1996. The growth of the sector is clearly evident with take up in 2018 more than three times that experienced in 1996, and the highest ever recorded in the UK.

⁵³ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019, paragraph 2.6

⁵⁴ Logistics: The Property Perspective H2 2018, CBRE, January 2019

Figure 5.1: UK logistics take-up, 1996 – 2018*

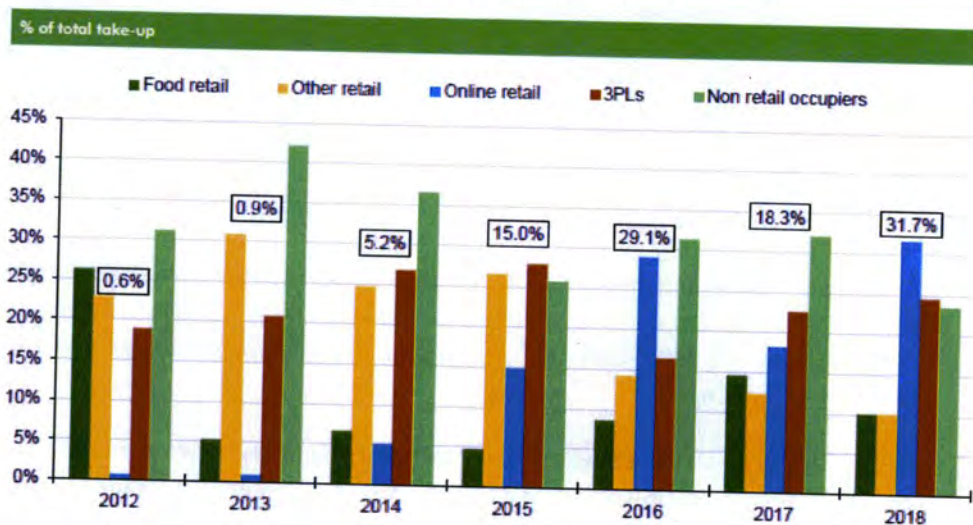


Source: CBRE, 2019

*Note: CBRE logistics data covers units of over 100,000 sq ft only

- 5.9 It can also be seen that new-build take-up made a greater contribution to the peaks in 2016 and 2018. The increased importance of new stock is symptomatic of the changing requirements of logistics operators, who are increasingly requiring large floorplate units built to a high specification. This includes high bay distribution facilities with eaves heights in excess of 15m in order to maximise storage capacity and reduce overall operating costs. It also highlights the general unsuitability of second-hand premises in meeting these modern occupier requirements.
- 5.10 CBRE report that e-commerce take-up witnessed particularly strong leasing activity during 2018. Large requirements from a wide range of online retailers were responsible for taking 9.98m sq ft of logistics space and underpinned the market, representing 32% of the total take-up.
- 5.11 As shown in Figure 5.2 below, growth in online retail and e-commerce has evidently had a corresponding and positive impact on the take up of logistics floorspace over a number of years, with this trend anticipated to continue.

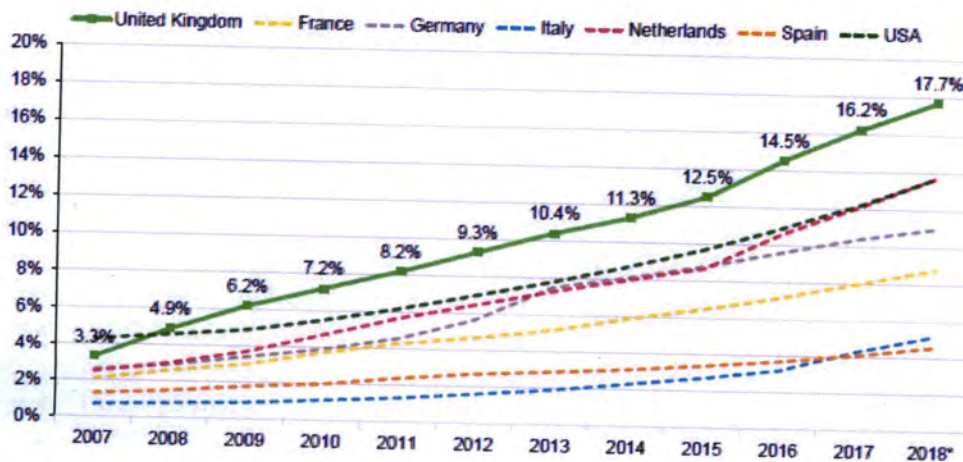
Figure 5.2: Online retail's contribution to the UK logistics take-up



Source: CBRE, 2019

- 5.12 The rapid growth of the sector is illustrated in Figure 5.4 below. Between 2007 and 2018 online sales grew by 14.4%, and now account for 17.7% of total retail sales in the UK. As can be seen, this is by far the largest and fastest rate of growth when compared to other European countries.

Figure 5.3: Online sales as a percentage of total retail sales in the UK and other international markets, 2016 - 2018



Source: ONS, Euromonitor, CBRE, 2019

- 5.13 Recent research published by the BPF confirms that this growth in online spending continues to drive rapid growth in the logistics sector, with the logistics sector innovating and evolving to keep pace with customer expectation⁵⁵. The report confirms the above trend that the UK has the largest proportionate online expenditure in

⁵⁵ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019

Europe, with Amazon now the UK's fifth largest retailer, and alone accounting for £4 in every £100 spent in retail in 2017⁵⁶.

- 5.14 Looking ahead, sales for non-store related retail (i.e. online sales and delivery with no store interaction) is projected to grow by 116% in the next ten years: £34.7 billion in 2018 to £75.1 billion in 2028. Overall, online retail, including that with a store interaction (e.g. Click and Collect services), is projected to grow by 81% (£59.8 billion in 2018 to £107.9 billion in 2028)⁵⁷.
- 5.15 The greatest growth in online retail expenditure is forecast to come in the regions where existing e-commerce expenditure is already highest⁵⁸. It is notable that, outside of London and the South East, the highest gross online expenditure is coming from the North West⁵⁹ of England.
- 5.16 As shown above in Figures 5.1 and 5.2, this growth is being matched in the significant growth in the proportion of logistics take-up that is serving online retail recorded over the past seven years, and it is widely this trend will continue, in turn driving strong take up of distribution units throughout the UK and across the North West region.
- 5.17 The market will evidently need to respond with additional warehouse space, and a planned and integrated network of last-mile, regional and national distribution centres. In location terms, a key focus is on minimising operational costs by locating distribution facilities close to motorway junctions accessible to centres of population and wider distribution networks. In the North West context, sites that are well located and connected to the spine of the M6, with the capacity to accommodate a range of facilities (including large facilities of over 500,000 sq ft) are of strong commercial appeal to occupiers operating in the sector.

The increasing demand for large scale units

- 5.18 Economies of scale, transport infrastructure improvements and technological advances have also enabled warehouses to increase in size to the extent that warehouses of 500,000 sq ft + are becoming more common. As shown in Figure 5.4 this is in evidence at the UK level, with the proportion of total space taken by properties over 500,000 sq ft growing from 33% in 2016 to 44% in 2018 (a 33% increase in two years). The opposite is the case for properties between 100,000 and 300,000 sq ft, the proportion of deals comprised by properties of this size falling from 51% in 2016 to 38% in 2018.

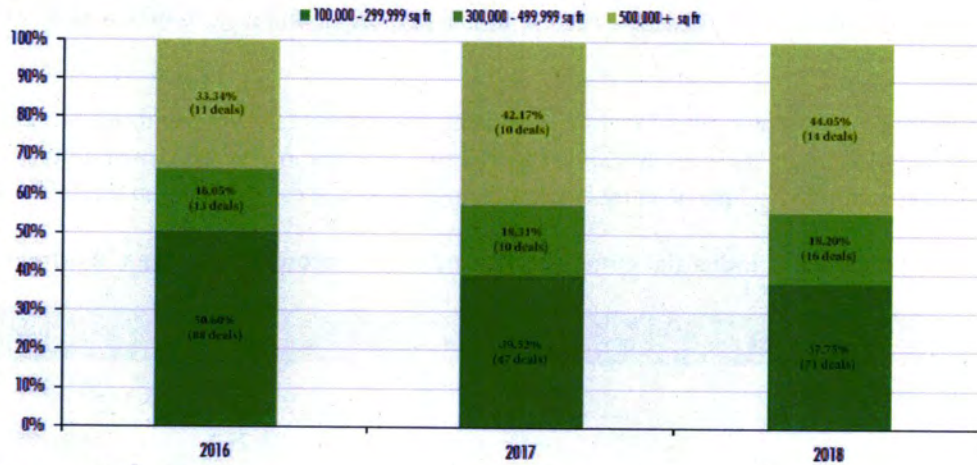
⁵⁶ Retail Gazette (2018) <https://www.retailgazette.co.uk/blog/2018/04/amazon-now-5th-largest-retailer-uk/> (Data from GlobalData)

⁵⁷ What warehousing where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning, A Report for the British Property Federation by Turley, March 2019, page 17

⁵⁸ Ibid.

⁵⁹ Pitney Bowes; Oxford Economics (2018)

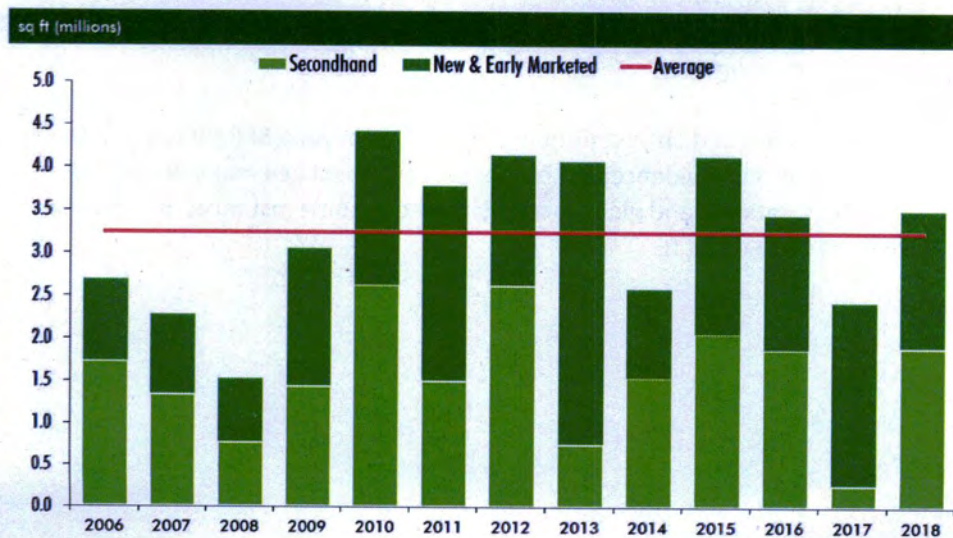
Figure 5.4: Proportion of space taken and number of deals by size band in the UK, 2016 – 2018



Source: CBRE, 2019

- 5.19 The below chart illustrates trends in take-up of logistics floorspace in the North West since 2006. With the exception of 2014 and 2017, the trend since 2010 is one of above trend take up.

Figure 5.5: North West logistics take-up 2010 – 2018*



Source: CBRE, 2019

*Note: CBRE logistics data covers units of over 100,000 sq ft only

North West Take up

- 5.20 CBRE report that take up of Grade A stock in the north west stood at 3.5m sq ft in 2018, an increase of £1.07m (or 44%) compared to 2017. As with the UK wide trend, the region also witnessed a record annual take-up of buildings in excess of 300,000 sq ft.
- 5.21 This trend is also evident when looking at longer term take-up trends on established logistics sites such as OMEGA in Warrington, with the increasing size of units being accommodated particularly evident from 2014 onwards, as shown in the table below.

Table 5.1: Industrial employment land leases recorded at Omega, Warrington

Sign Date	Occupier	Sq m leased	Sq ft leased
Apr 2010	Royal Mail	19,680	211,834
Apr 2013	Hermes Parcelnet Ltd	14,269	153,590
Aug 2013	Brakes Brothers	18,426	198,336
Nov 2014	Travis Perkins Plc	58,570	630,442
Nov 2015	The Hut Group	63,731	685,994
Dec 2016	Amazon	33,166	356,996
Jul 2018	Royal Mail	32,516	350,000
Total	-	240,358	2,587,192

Source: CoStar, 2019

- 5.22 CBRE anticipate unit sizes continuing to increase beyond 500,000 sq ft in the coming years. This can be evidenced with reference to recent key major North West enquiries from local, national and global occupiers, who in some instances are seeking units in excess of 700,000 sq ft.

Table 5.2: Occupiers making North West enquiries and their requirements

Occupier	Search Area	Size (sq ft) ▼
BooHoo	North West	700,000 + expansion
DHL	M6 North West	700,000
L'Oréal	Manchester	600,000 + expansion
Stobart	M6 Corridor	600,000
IKEA	M6/M62 Corridor	500,000 + expansion
Ocado	North West	350,000 +
Makita	North West	350,000
c/o CBRE	M6 North West	200,000 – 400,000
c/o Avison Young	North West	200,000 – 300,000

Source: CBRE, 2019

A paucity of floorspace supply to meet demand

- 5.23 CBRE report that the region's available Grade A space cannot satisfy all the demand from occupiers seeking this type of space. There is just one building under construction within the North West that is larger than 500,000 sq ft. This is despite the increasing demand for units of this scale and a number of specific requirements in the market place, reflective of the specific land (and locational) requirements for buildings of this type: large, flat sites readily accessible to the motorway network.
- 5.24 Figure 5.6 presents logistics space availability trends in the North West since 2008. It can be seen that availability has decreased markedly in that period. Whilst availability has remained fairly stable since 2012, it is noted by CBRE that the current supply of Grade A logistics accommodation has increased slightly over the past 12 months, due primarily to the increase in speculative development. Notwithstanding this, the current total Grade A availability of 3.38 million sq ft (comprised of 17 units) represents just under 12 months' supply.

Figure 5.6: North West logistics availability, 2008 – 2018



Source: CBRE, 2019

*Note: CBRE logistics data covers units of over 100,000 sq ft only

- 5.25 A list of speculative units in the North West ready for occupation⁶⁰ in the short term has been compiled by CBRE. This includes both buildings that are already completed and those that are under construction. As shown in the table below, just one built unit (375 Logistics North, Bolton, at 375,000 sq ft) and one of the speculative unit under construction (525 Haydock, at 523,500 sq ft) are larger than 300,000 sq ft and available to the market.
- 5.26 It is also of note that over the past five years, the supply of Grade A distribution facilities in excess of 500,000 sq ft has been limited to a single building (The Vault) in South Liverpool, comprising 618,000 sq ft and located 17 miles from the M6 motorway. This has since been taken up, and the absence of new supply many occupiers therefore have no choice other than either buying land or agreeing a Design & Build contract with a developer, delaying their investment in the region.

⁶⁰ Correct as of February 2019.

Table 5.3: North West speculative logistics availability

Site	Size (sq ft) ▼
Existing	
375 Logistics North, Bolton	375,000
Crewe 240, Crewe	236,900
Kingsway 216, Rochdale	216,400
Unit F2 Multiply, Bolton	149,150
H2, Heywood Point, Heywood	148,850
Unit 2 Omega, Warrington	137,850
Unit 1, Evolution Point, Salford	130,000
Q110, Crewe	110,000
Academy, Knowsley	110,000
Under Construction	
525 Haydock	523,500
Venus 200, Knowsley	208,000
Unit 1 Frontier Park, Blackburn	185,500
Unit 4 Omega, Warrington	183,670
Liberty Park, Widnes	107,200

Source: CBRE, 2019

A rapidly diminishing supply of large scale logistics sites

- 5.27 Table 5.4 provides a summary of sites which are located within 2.5 miles of a motorway junction and which could be considered suitable for future logistics requirements. It is highlighted that prime sites such as Omega South have seen recent success due to being “oven ready” for development, which is a key driver for occupiers when identifying new sites for expansion or relocation of their business.
- 5.28 These sites are presented in the below table, alongside sites that were identified as also “oven ready”, but without the motorway access required for use as national distribution centres.

Table 5.4: Land availability in the North West

Site	Size ▼	Availability
Sites within 2.5 miles of M6 Corridor		
Omega South, Skyline Drive Warrington	Capacity for 750,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission granted for B2/8.
Icon Manchester Airport	Capacity for 550,000 sq ft. Largest single unit developable is c.300,000 sq ft	Outline planning permission for 1.4 million sq ft
Gorsey Lane Widnes	Capacity for 500,000 sq ft.	Former manufacturing facility with B2/8 use
GPark Skelmersdale	330,000 sq ft	Outline planning permission
Haydock Green (Penny Lane) Haydock	Largest single unit developable is c.125,000 sq ft	Outline planning permission
Haydock Link 23 (Haydock Lane) Haydock	300,000 sq ft	Outline planning permission
M6Major (Florida Farm) Haydock	5 acres remaining. Largest single unit developable is c.100,000 sq ft	Outline planning permission

Source: CBRE, 2019

- 5.29 It is also noteworthy that existing or permitted major North West schemes (including on key logistics sites at Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport) are unable to accommodate a single building in excess of 500,000 sq ft. This evidently acts as a constraint, but equally represents an opportunity for St Helens to capture spill over demand from more established sub-market areas.
- 5.30 Owing to current demand in the marketplace for large-scale units that meet logistics occupier requirements, CBRE expect that current prime sites at Omega and Icon (at Manchester Airport) are likely to be fully occupied within the next 12-18 months. It is further highlighted that secondary sites, including those at Skelmersdale and Widnes, whilst being available to the market are unlikely to compete directly for occupiers due to their location further from the motorway, and associated impact on operating costs.

Implications for the employment land OAN

- 5.31 The updated CBRE evidence indicates a positive market context and strong underlying demand for large scale logistics sites across the North West region. This is evidenced by:
- The continued dominance of e-commerce not only as a driver of demand but in defining the locational and unit specifications of the sector. This is evolving the property market to cater for purpose built, new warehousing;
 - The corresponding growth in take up, particularly of large scale new build units in excess of 500,000 sq ft; and
 - Occupier demand remaining focussed on “prime” development sites, which ideally need to be located within close proximity of major motorway junctions, such as the M6.
- 5.32 Of concern, however is the continued diminution of the available supply; the supply of Grade A supply stands at only 12 months’ when benchmarked against prevailing rates of take up. Critically, reflecting the increasing size of requirement, there is no supply of existing buildings of Grade A specification in excess of 600,000sqft in the North West.
- 5.33 There is also a limited supply of “oven ready” consented sites within 2.5km of motorway junctions. Major North West schemes including Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a single building in excess of 500,000 sq ft. This represents a key gap in the supply, which if not proactively addressed will undermine attainment of the economic ambitions for the LCR and wider region.
- 5.34 These trends form a critical context for the PSLP and reinforce the importance of ensuring the borough’s OAN and any subsequent employment land allocations provide sufficient flexibility to respond positively to market requirements throughout the lifetime of the Plan.
- 5.35 Crucially, a failure to adequately plan for this need over the full duration of the Plan creates a risk of under supply in terms of amount, site size/capacity and location to meet the market requirements. This will in turn lead to missed investment opportunities – the very issue the Plan is seeking to mitigate.
- 5.36 For these reasons it is essential that the PSLP plans positively to meet market needs in full and to break the historically imposed shackles of a constrained supply of allocated sites.

6. Review of the Employment Land OAN

- 6.1 As outlined in section 2, the ELNS Addendum identifies a requirement for provision of 190 – 239 ha of employment land in St Helens over the period 2012-2037. This comprises:
- a baseline (land take-up scenario) need of 135 - 174 ha; and
 - additional land demand associated with major projects of 55 – 65 ha.
- 6.2 Our concern is that planning on the basis of the current employment land OAN, and lower requirement this generates in the LPSD, will not be as effective in facilitating the 'strong shift to B8 (storage and distribution) uses'⁶¹ anticipated to occur over the Plan period and the wider achievement of the economic growth in line with the stated ambitions of the Council, LCR and the Government.
- 6.3 It is therefore necessary to reconsider both aspects of the employment land OAN calculation.

Baseline employment land needs

- 6.4 This report presents evidence that challenges the representativeness of the baseline OAN figure. Whilst the use of past take-up is considered to be a reasonable approach in principle, the reliance on the period 1997-2012 is not considered to be representative of the more positive growth strategy now being advanced in the Plan, which places a strong emphasis on logistics driven growth. Furthermore, it is counter to market evidence and sentiment.
- 6.5 It is considered there is a strong evidential case for basing the employment land need for St Helens on the 1998-2008 growth period scenario, and take up of 7.5ha per annum.
- 6.6 This position can be justified with reference to a number of notable influences on past take up and likely future take up:

Influences on past take up

- **The inadequacy of the borough's historic land supply.** It of note that the 1998 UDP's employment land policies made only limited provision for strategic scale logistics development, the largest of which was taken up in 2002/03 via the development of the Somerfield / Co-op distribution facility. The dearth of market attractive sites has had a disproportionate effect on industrial take up over an extended period as evidenced in Figure 4.1. It is of particular note that St Helens recorded the second lowest take up of all LCR authorities over the period from 2005 to 2015. Take up from 2010 to 2014 in particular being well below that witnessed across Liverpool, Halton and Knowsley over the same period.

⁶¹ Ibid, paragraph 4.12.5

- **The sectors driving employment growth.** Over the period from 1997-2012 employment growth in St Helens stood at just 0.2%, compared to 0.5% and 1.0% across the LCR and wider UK. In contrast, the relatively strong local performance in the 1998-2008 period is evident, with St Helens (0.9%) performing better than the LCR (0.8%). It is notable that employment growth in the logistics sector was higher in St Helens over the period from 1998 to 2008, coinciding with improved availability of larger scale sites.

Influences on future take up

- **The growth of the online retail market.** As reported by CBRE, demand for logistics space has increased markedly over time and the average size of buildings has increased. The demand for land is greater, and in substantially larger parcels. This trend is being sustained and can be expected to continue. The evidence of past take-up, particularly in St Helens where the supply has rarely catered for such needs is not an accurate guide to future needs.
- **The strong longer-term employment land take-up rates in Warrington.** Through positive planning Warrington has witnessed strong rates of take up equivalent, on average, to 14.65ha per annum over the period from 1996 to 2016. This is significantly higher than the 4.5 ha per annum witnessed in St Helens over the period from 1997 to 2017, and the 5.8 ha per annum over the period from 1997 to 2012. St Helens shares similar location attributes to Warrington and has the land resource to achieve comparable rates of take up with supportive policy provisions.
- **The degree to which demand is being met within the North West region.** CBRE's evidence demonstrates a limited land supply in the North West capable of meeting the demand for large scale warehousing in highly accessible locations such that St Helens. . As seen with the recent planning approvals in Haydock, where supply is available take up can quickly occur.

- 6.7 The Council's evidence recognises that logistics is the most likely sector to drive growth in St Helens over the Plan period. It is considered to be essential to base the employment land need on the 1998-2008 scenario period as this reflects a period when trends better reflected the positive growth strategy which the Plan purports to deliver.
- 6.8 Application of this would result in an increased baseline employment land need (including a five-year buffer) of 225 ha over the period from 2012 to 2037.

Additional land demand associated with major projects

- 6.9 On top of the 'rolling forward' of past take-up trends, the Council's approach to establishing the OAN takes into account and makes a further allowance, of 65 hectares, for the effect of major project investment, specifically the influences on demand arising from SuperPort and the Parkside SRFI. This 'uplift' is increased from 40 hectares as included for within the POLP.
- 6.10 Whilst the principle of applying an uplift is considered to be appropriate, the scale of the uplift is considered to be unjustified and insufficient relative to the scale of market demand.

- 6.11 It is considered, therefore, that a larger allowance should be made to reflect:
- the influence that major infrastructure investment projects are likely to have;
 - the appeal of St Helens to the increasingly active large scale logistics market; and
 - the role it can and is expected to play in meeting growing sub-regional needs.
- 6.12 There is a clear justification for a more notable uplift which allows for St Helens to take a larger share of sub-regionally assessed need. This relates specifically to need arising from the development of major logistics infrastructure resulting from the growth of SuperPort. The current 65 ha allowance, which is reflective of St Helens taking just a 16% share of the additional large scale B8 land demand forecast across the LCR, is felt to be a potential underestimate due to the historically constrained land supply – a constraint which has only been accentuated by the methodology applied in the ELNS Addendum. St Helens' relative accessibility to both the Port of Liverpool and motorway networks highlighting its potential to accommodate a larger share of sub-regional demand. Although this is acknowledged within the ELNS Addendum no upward adjustment is made, with it assumed that St Helens will maintain its 2014 market share.
- 6.13 Given a policy focus on growth, it is considered that an adjustment based on at least 20% would better reflect growth aspirations and St Helens' evident locational advantages. It is notable that the 2015 ELNS⁶², noted that St Helens could potentially secure 20% of SuperPort related growth, stating:
- "When considering the above, it is the BE Group's opinion that St Helens could deliver some 50-70 ha of the total requirement, equating to about 15 to 20 percent share of the total. If the Council wanted to pursue a stronger development policy, there would be the potential to increase this share, given that land constraints may hamper development in other areas. St Helens, however, would need to overcome their own land constraints to deliver this requirement"*⁶³.
- 6.14 It is counter intuitive that in the face of a strategy which is arguably more pro-economic growth, and in one of the most attractive locations in the LCR for logistics that the ELNS Addendum should conclude that St Helens will in effect "tread water" and only maintain its existing share of the market.
- 6.15 It is also considered that additional allowances should be made to accommodate near-term demand emanating from the unmet needs in the North West region, as well as the potential longer term market demand generated from the Parkside investment. This can be justified with reference to the pace of development at Omega Warrington and that now being seen on consented logistics sites in Haydock, but also the growing demand for larger scale units in excess of 500,000 sq ft which are can no longer be accommodated on established logistics sites across the region.

⁶² St Helens Employment Land Needs Study, BE Group, October 2015

⁶³ Ibid, para 8.62

- 6.16 Accommodating this need represents a key part of the borough's growth strategy, yet at present its capacity to do so in commercially attractive locations is severely limited. Current capacity at both the M6Major (Florida Farm North) and Haydock Green (Land North of Penny Lane) sites has reduced significantly following strong occupier and investor interest. Once the 523,500 sq ft speculative unit complete the largest single unit that can be accommodated on these sites will be just 125,000 sq ft. This highlights a clear mismatch between demand in the market – driven by e-commerce and the need for large floorplate units - and supply, in advance of the Plan being adopted. This renders the Plan ineffective in its land supply.
- 6.17 This also clearly demonstrates that demand is already outstripping supply and a greater allowance needs to be made to accommodate growing demand from large scale logistics occupiers who have requirements for land and floorspace in the North West, and M6 Corridor more specifically.
- 6.18 On the basis of the above and given the PSLP's focus on economic growth, it is considered reasonable to make provision for a further 15 ha of land over and above the recommended 65 ha allowance.
- 6.19 In combination with the revised baseline need of 225ha, this would increase the borough's employment land OAN to 305 ha.

7. Conclusion and Policy Implications

- 7.1 The evidence presented within this report provides a clear justification for increasing the borough's OAN for employment land, as assessed within the ELNS Addendum, to 305ha over the period from 2012 to 2037.
- 7.2 This overall need is derived from:
- a minimum baseline employment land need of 187.5 ha over the period from 2012-2037 (25x7.5ha) plus a five year buffer of 37.5 ha to ensure adequate choice and flexibility (225ha in total); and
 - up to 80 ha of additional land to accommodate demand generated from major projects across the LCR in addition to the growing market demand for large scale logistics across the North West Region.
- 7.3 These needs are summarised in the table below and represent an uplift of 66ha when compared to the upper end of the BE Group derived employment land OAN figure of 239ha (174ha + 65ha)⁶⁴.

Table 7.1: Employment Land Needs 2012-2037

	Ha
Baseline employment Land Needs – based on Growth Period 1998-2008 BE Group scenario – plus 5 year buffer	225
Additional land demand major projects	80
Total Employment Land Needs	305

Source: Turley

Implications for Policy LPA04

- 7.4 It is noted that the OAN is adjusted within the PSLP to reflect the forecasting base date of 2012 to the end date of the Plan (i.e. the period from 2012 to 2035). The implications of the upward adjustment being recommended are illustrated in Table 7.2.

⁶⁴ Employment Land Needs Study, Addendum Report, BE Group, October 2017 – Amended January 2019

Table 7.2: PSLP Employment Land Requirement 2012-2035

PSLP OAN	Ha	Revised ONA	Ha
Baseline employment Land Needs – based on 1997-2012 scenario	133.4	Baseline employment Land Needs – based on Growth Period 1998-2008	172.5
5 year buffer	29	5 year buffer	37.5
Allowance for SuperPort and Parkside SFRI	65	Allowance for major projects and increasing logistics demand	80
Total Employment Land Needs	227.4	Total Employment Land Needs	290

Source: PSLP Table 4.3 and Turley Analysis

- 7.5 Using the above, the PSLP establishes a residual requirement for employment land that must be provided for within the Plan. This is based on the period from 2018 to 2035 and takes in account:
- take up of employment land since 2012 to the end of the last monitoring period (31st March 2018) – equivalent to 2.7ha; and
 - the existing supply of developable employment land – equivalent to 9.3ha.
- 7.6 The approach is replicated in the Table below, again showing the comparison between the PSLP derived residual employment land requirement with that established by Turley using the same methodology.

Table 7.3: PSLP Residual Employment Land Requirement 2018-2035

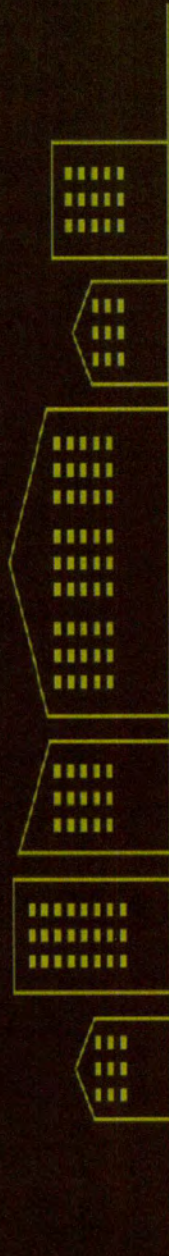
PSLP OAN	Ha	Revised ONA	Ha
A. Total Employment Land Needs 2012-2035	227.4	A. Total Employment Land Needs 2012-2035	290
B. Take up between 1 April 2012 and 31 March 2018	2.7	B. Take up between 1 April 2012 and 31 March 2018	2.7
C. Existing supply of Developable Employment Land	9.3	C. Existing supply of Developable Employment Land	9.3
Total Employment Land Needs (A-B-C)	215.4	Total Employment Land Needs (A-B-C)	278

Source: PSLP Table 4.4 and Turley Analysis

- 7.7 Taking into account take up of between 2012 and 2018 (2.7ha) and the existing supply of developable land (9.3ha) (Table 4.4 of the PSLP), the total residual requirement

(2018-2035) would be 278ha (an increase of 61.6ha from the 215.4ha established in Table 4.4 of the PSLP). This requirement should be reflected in Policy LPA04.

Appendix 1: CBRE Logistics Market Report



LOGISTICS MARKET REPORT

ON BEHALF OF PEEL LOGISTICS

FEBRUARY 2019

01

UK LOGISTICS TAKE-UP



UK LOGISTICS TAKE-UP 1996 – 2018

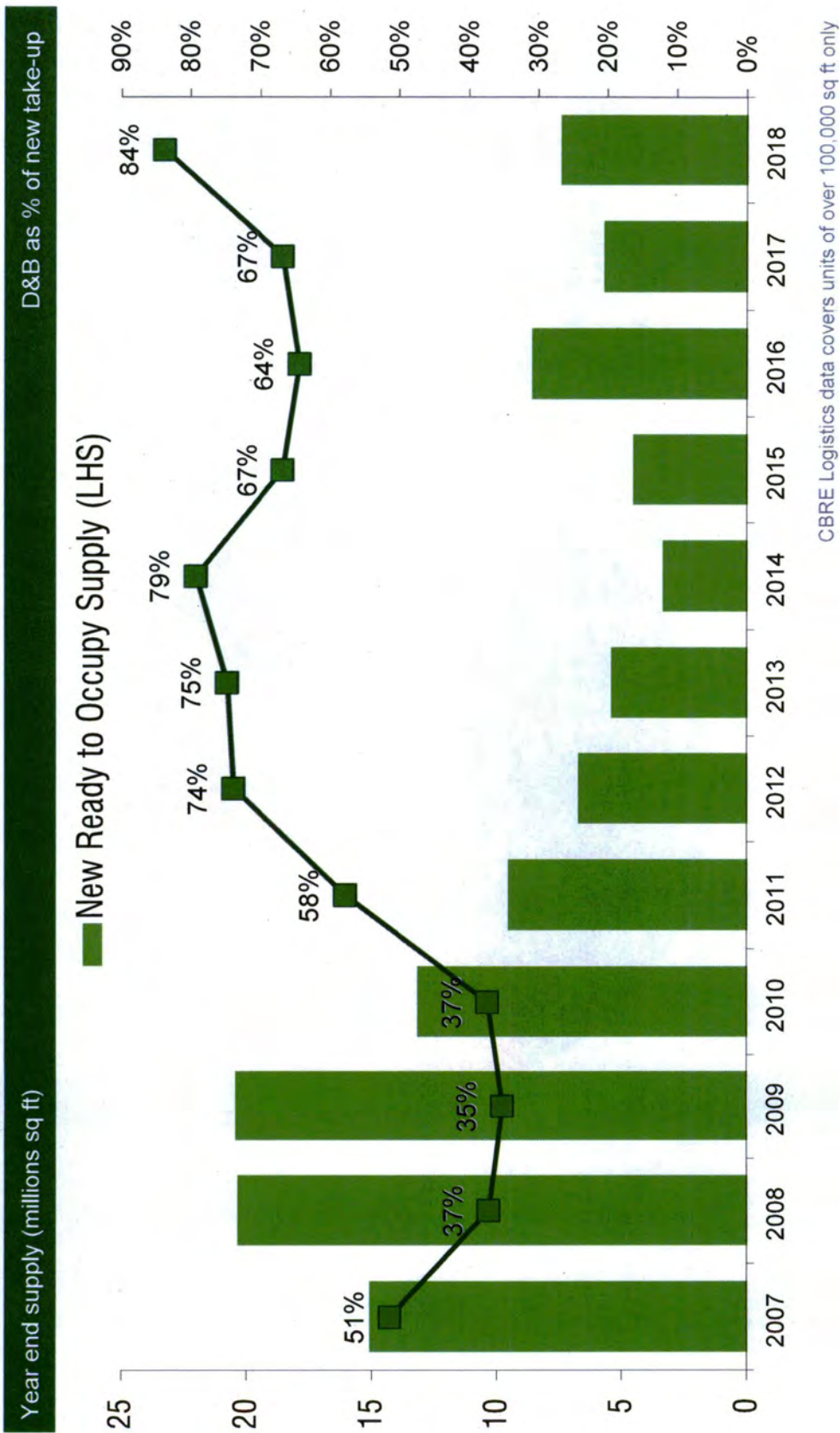
- The e-commerce revolution will continue to drive sustained demand for industrial and logistics space in 2019, with demand for bigger 'big boxes' increasing fastest
- In 2018, over 31% of UK Grade A units (in excess of 100,000 sq ft / 10m eaves) were taken by online retailers
- The average unit size exceeded 300,000 sq ft



CBRE Logistics data covers units of over 100,000 sq ft only

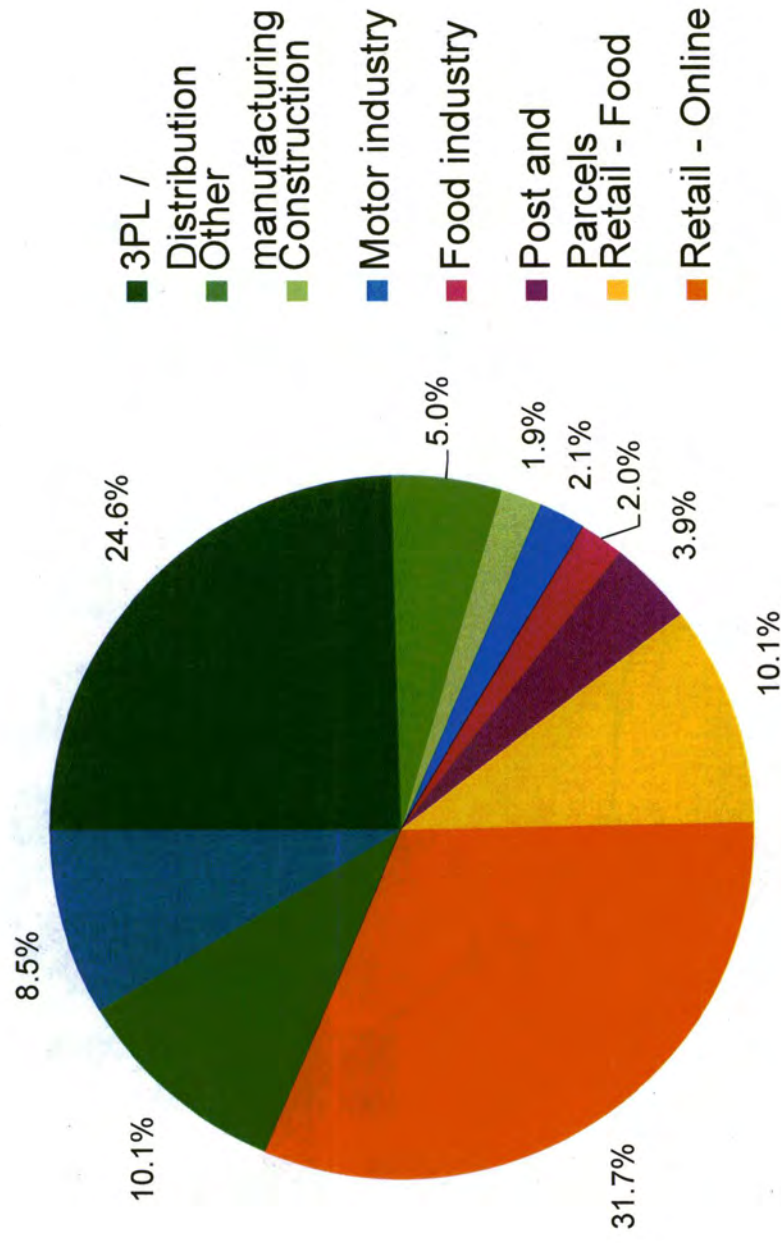
Source: CBRE

DESIGN & BUILD TAKE-UP AND NEW BUILD SUPPLY 2007 – 2018



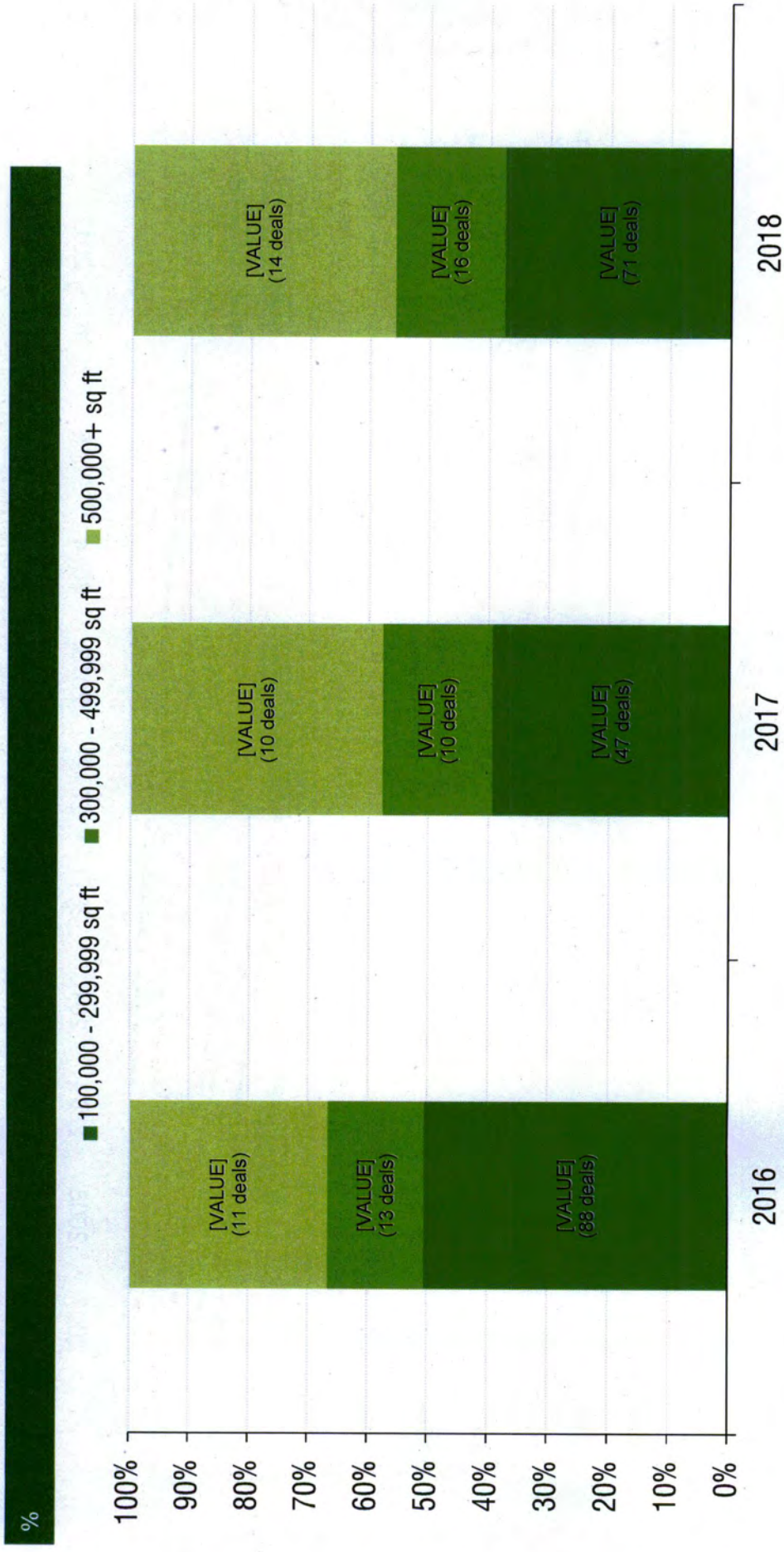
Source: CBRE

UK LOGISTICS TAKE-UP BY SECTOR 2018



Source: CBRE

PERCENTAGE OF SPACE TAKEN AND NUMBER OF DEALS BY SIZEBAND IN THE UK 2016 – 2018



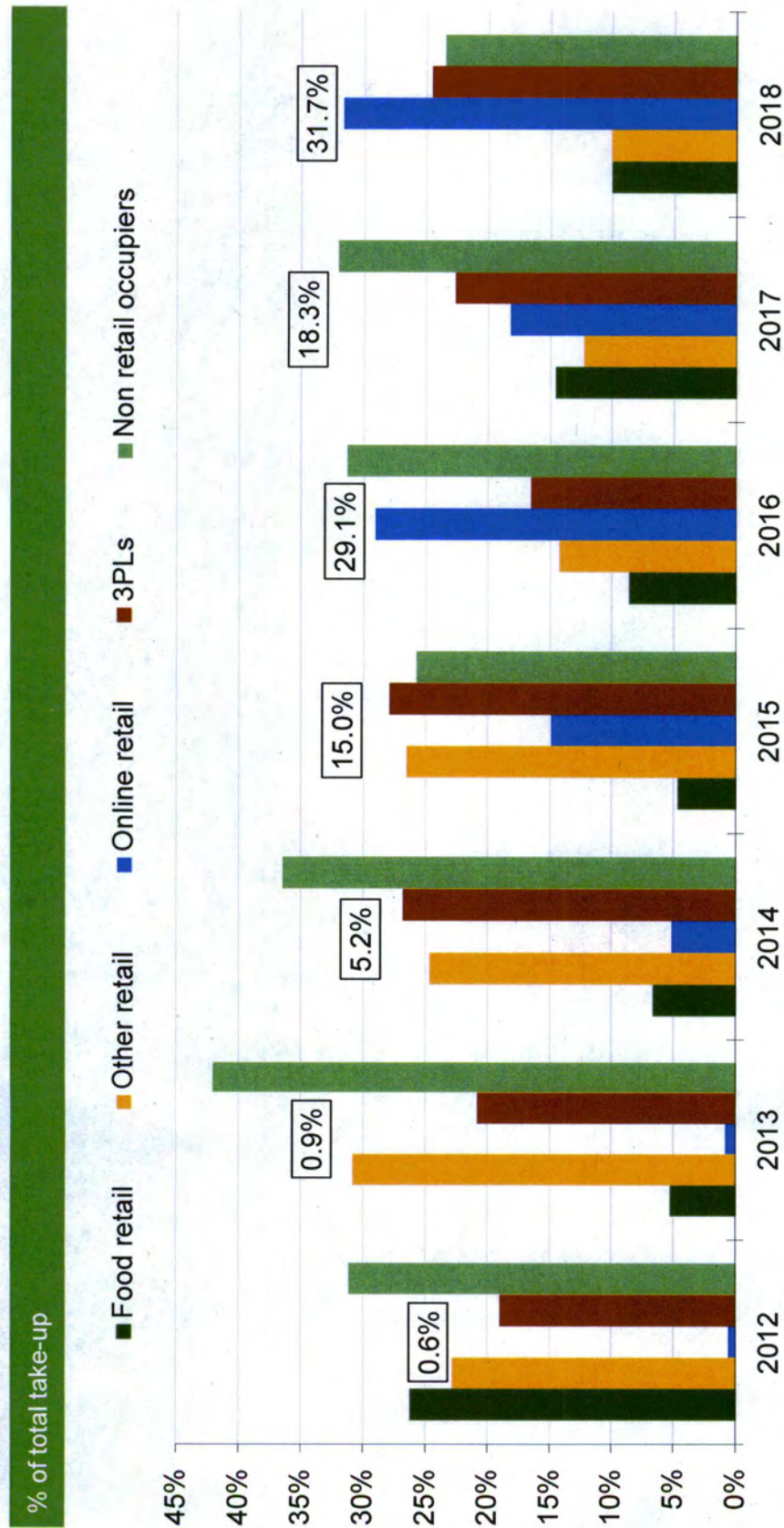
ONLINE SALES PENETRATION AS A % OF TOTAL RETAIL SALES 2016 – 2018



Source: ONS, Euromonitor, CBRE

*Note: Stats for 2018 are still provisional and pending of the final revision

RISE OF ONLINE RETAIL IN UK'S LOGISTICS TOTAL TAKE-UP 2016 – 2018



Source: ONS, Euromonitor, CBRE

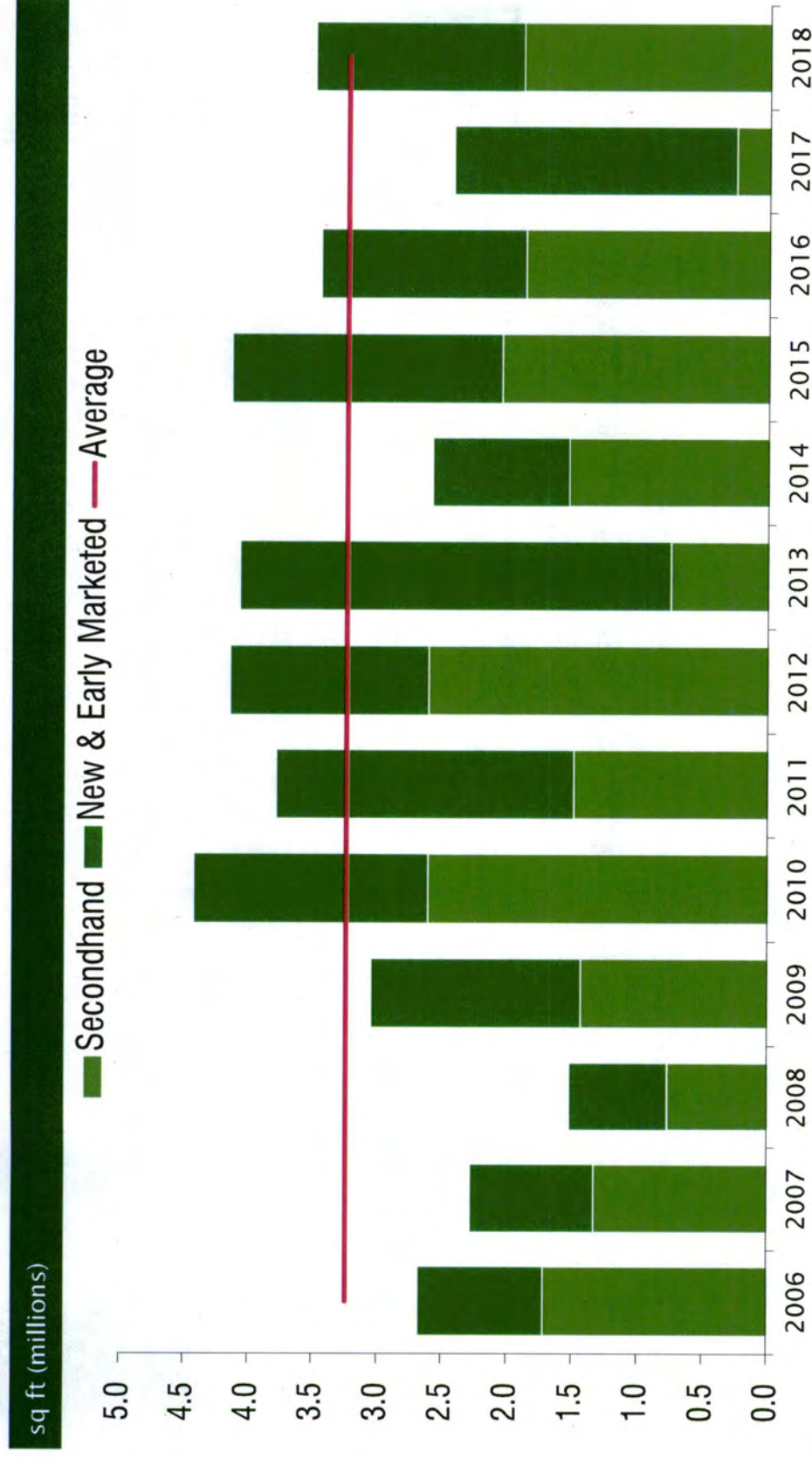
*Note: Stats for 2018 are still provisional and pending of the final revision

02

**NORTH WEST
LOGISTICS TAKE-UP**



NORTH WEST LOGISTICS TAKE-UP 2006 - 2018



Source: CBRE

CBRE Logistics data covers units of 100,000 sq ft only

NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

- Take Up in 2018 (units of 10m+ in excess of 100,000 sq ft) for Grade A stock was 3.50m sq ft, an increase of 1.07m compared to 2017
- Take Up of all stock (units in excess of 100,000 sq ft) was 4.26m sq ft, an increase of 1.15m sq ft compared to 2017
- 2018 witnessed a record annual take-up of buildings in excess of 300,000 sq ft plus (see below)
- CBRE anticipate units sizes continuing to increase beyond 500,000 sq ft from occupiers in coming years

	Address	Town	Occupier	Size (sq ft)	Comments
	Mountpark Omega	Warrington	Royal Mail	347,938	Spec build Dec 2018 15 years £6.25 psf
	Haydock Green	Haydock	Movianto	371,000	D&B Mar 2018 15 years £6.15 psf
	M6Major	Haydock	Amazon	360,000	D&B Sep 2018 15 years P&C rent

Source: CBRE

NORTH WEST LOGISTICS TAKE-UP KEY DEALS 2018

Address	Town	Occupier	Size (sq ft)	Comments
 Unit 3&4 M58	Skelmersdale	Kammac	370,000	Existing unit Oct 2018 Assignment of 10 year lease £3.50 psf
 Middlewich 353	Middlewich	Go Outdoors	353,102	Existing unit Oct 2018 10 years £5.25 psf
 K333	Trafford Park	Kinaxia	333,000	Existing unit Oct 2018 15 years £6.40 psf

Source: CBRE

CBRE Logistics data covers units of 100,000 sq ft only

CBRE

03

NORTH WEST CURRENT DEMAND



KEY REQUIREMENTS 2018

North West

- The list below is not a comprehensive list of all live enquiries, but merely a summary of "key" major North West enquiries from local, national and global occupiers
- Grade A supply in the North West region will not supply the majority of this demand and occupiers will have no alternative other than to consider Design & Build sites
- There is only one Grade A building in excess of 300,000 sq ft but this will not satisfy all demand.
- Furthermore, only one building in excess of 500,000 sq ft is under construction (available June 2019), but this will only meet the needs of some occupier demand, but not all

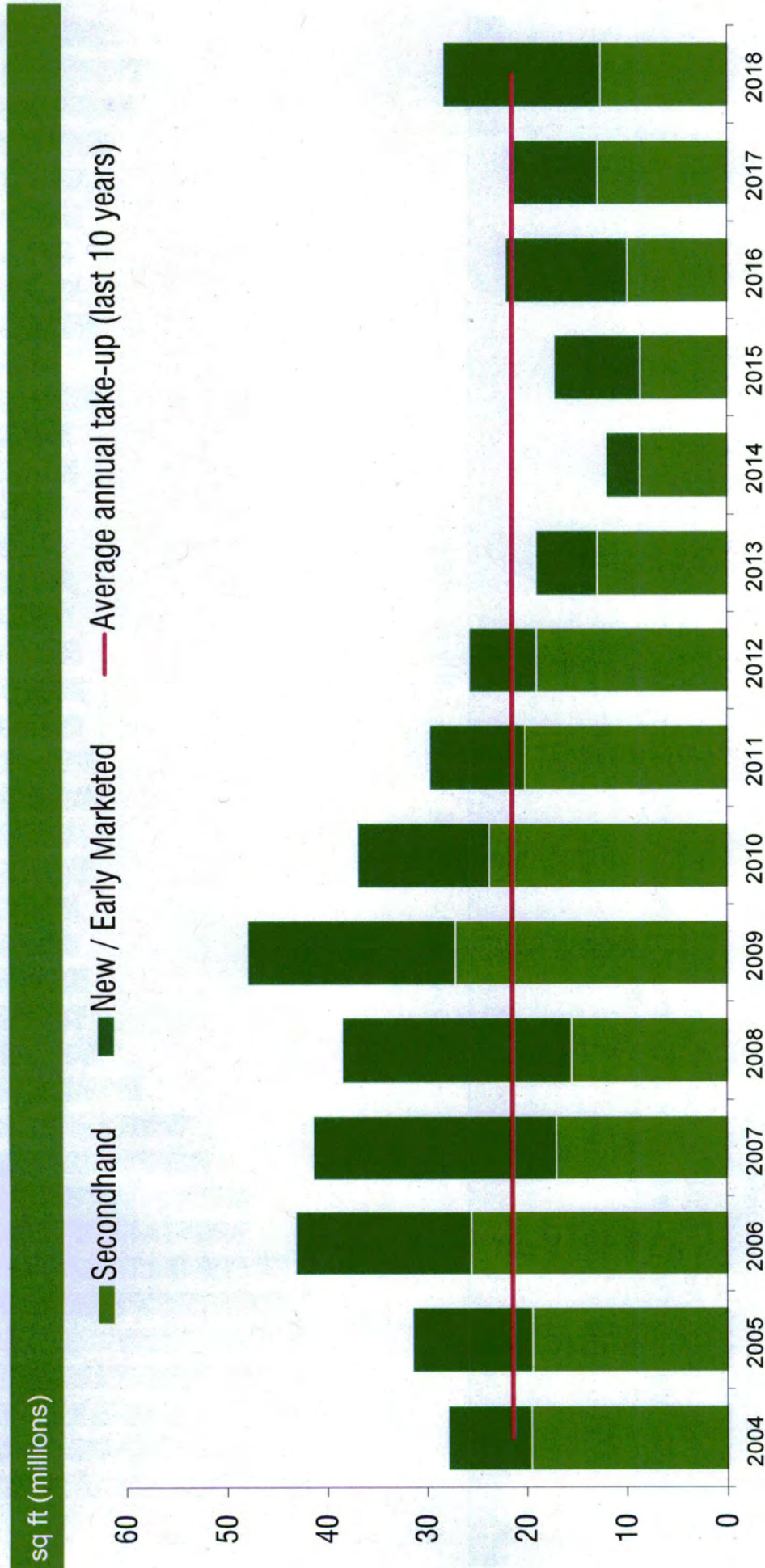
Occupier	Search Area	Size (sq ft)	Comments
IKEA	M6/M62 corridor	500,000 + expansion	FH preferred. Occupation within 2 years. years. Colliers acting
L'Oréal	Manchester	600,000 + expansion	LH. Occupation within 2 years. Colliers acting
Ocado	North West	350,000 +	LH/FH. M6/M62. Gerald Eve acting
DHL	M6 North West	700,000	LH. New contract led requirement for European customer.
BooHoo	North West	700,000 + expansion	FH preferred. Ongoing requirement due to growth of business. P3 Surveyors acting to LH requirement for US client. Timing 2020
c/o CBRE	M6 North West	200-400,000	
Makita	North West	350,000	FH/LH. New build only.
c/o Avison Young	North West	200-300,000	LH. Grade A facility for PLC client
Stobart	M6 corridor	600,000	LH. Expansion of Warrington facility

04

UK LOGISTICS AVAILABILITY



UK LOGISTICS AVAILABILITY 2004 – Q4 2018



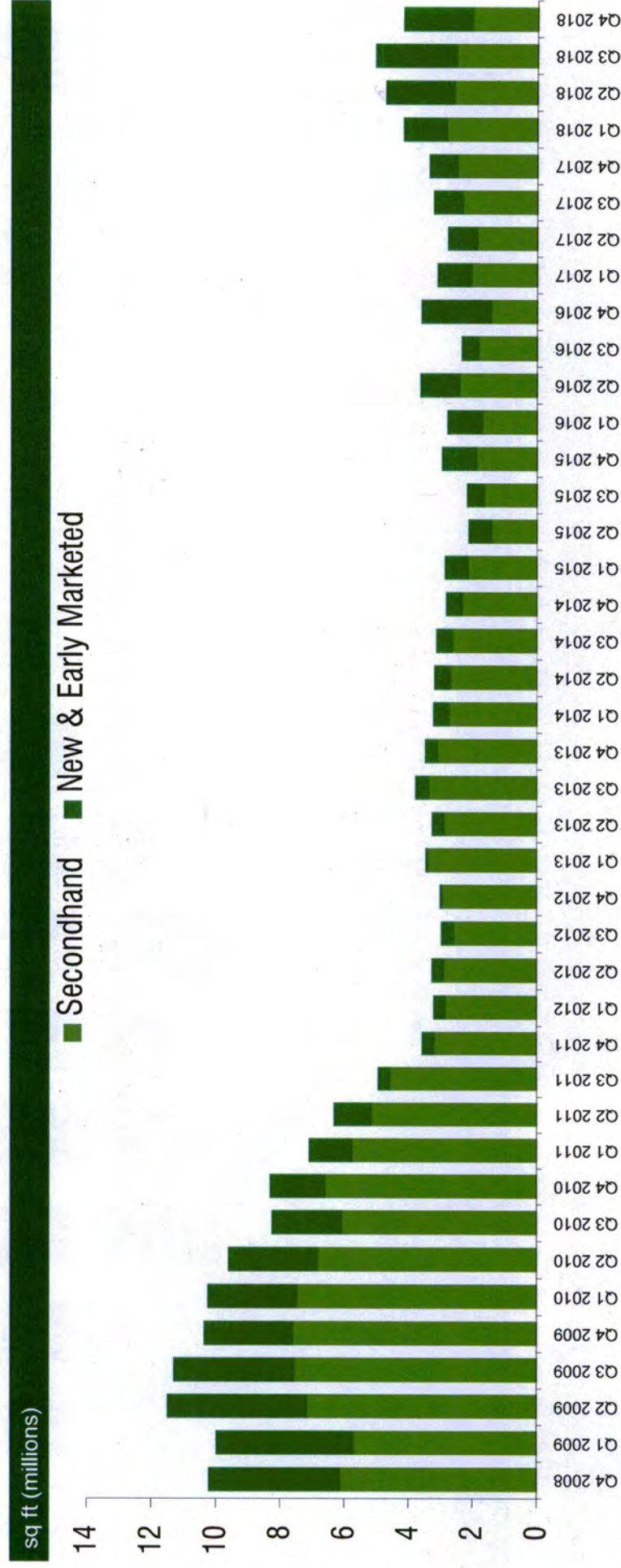
Source: CBRE

CBRE Logistics data covers units of 100,000 sq ft only

CBRE

NORTH WEST LOGISTICS AVAILABILITY 2008 – Q4 2018

- Current supply of Grade A logistics accommodation has increased slightly over the past 12 months due primarily to the increased speculative development
- Total Grade A North West availability stands at 3.38m sq ft (17 units) – representing sub 12 months' supply
- Grade A availability of units in excess of 300,000 sq ft stands at 680,000 m sq ft (2 units)
- Grade A stock under construction is 1.21m sq ft (5 units)



Source: CBRE

CBRE Logistics data covers units of 100,000 sq ft only

05

**NORTH WEST
SPECULATIVE LOGISTICS
AVAILABILITY**



NORTH WEST SPECULATIVE LOGISTICS AVAILABILITY

- As at February 2019, 9 speculative units were ready for occupation totalling 1.61m sq ft (see table below)
- A further 5 units are under construction providing 1.21m sq ft (see table on next page)
- Only 1 unit in excess of 300,000 sq ft is available, plus a single unit of 523,500 sq ft currently under construction

ADDRESS		SIZE (SQ FT)	ADDRESS		SIZE (SQ FT)
Q110, Crewe	110,000		Unit F2, Multiply, Bolton	149,148	
Academy, Knowsley	110,000		Kingsway 216 Rochdale	216,410	
Unit 1, Evolution Park, Salford	130,000		Crewe 240, Crewe	236,915	
Unit 2, Omega, Warrington	137,865		Kingsway 216 Rochdale	216,410	
H2, Heywood Point Heywood	148,856		375, Logistics North Bolton	375,000	

NORTH WEST SPECULATIVE LOGISTICS UNDER CONSTRUCTION

ADDRESS	SIZE (SQ FT)
Liberty Park, Widnes	107,210
Unit 4, Omega, Warrington	183,669
Unit 1, Frontier Park, Blackburn	185,500
Venus 200, Knowsley	208,000
525 Haydock	523,500

06

**NORTH WEST
EXISTING LOGISTICS
AVAILABILITY**



NORTH WEST EXISTING LOGISTICS AVAILABILITY (EXCLUDING SPECULATIVE UNITS)

- Current availability for BIG BOX distribution units is limited
- Supply of units over 100,000 sq ft (eaves height in excess of 10m) is limited to only 8 buildings – totalling 1.77m sq ft
- Of the buildings below, it could be argued the majority could not be classed as being comparable to a new build institutional building and therefore occupiers requiring modern facilities are likely to dismiss the remaining buildings and instead focus on Design & Build opportunities

ADDRESS	SIZE (SQ FT)	ADDRESS	SIZE (SQ FT)
Altham Business Park, Accrington	125,210	Pioneer 210, Ellesmere Port	211,921
Stonecross 135, Golborne	136,000	Warrington 250	255,000
Link Six 56, Warrington	145,122	Tetronic 300, Middleton	305,156
Fraser Place, Trafford Park	208,000	Dallam Point, Warrington	379,000

07

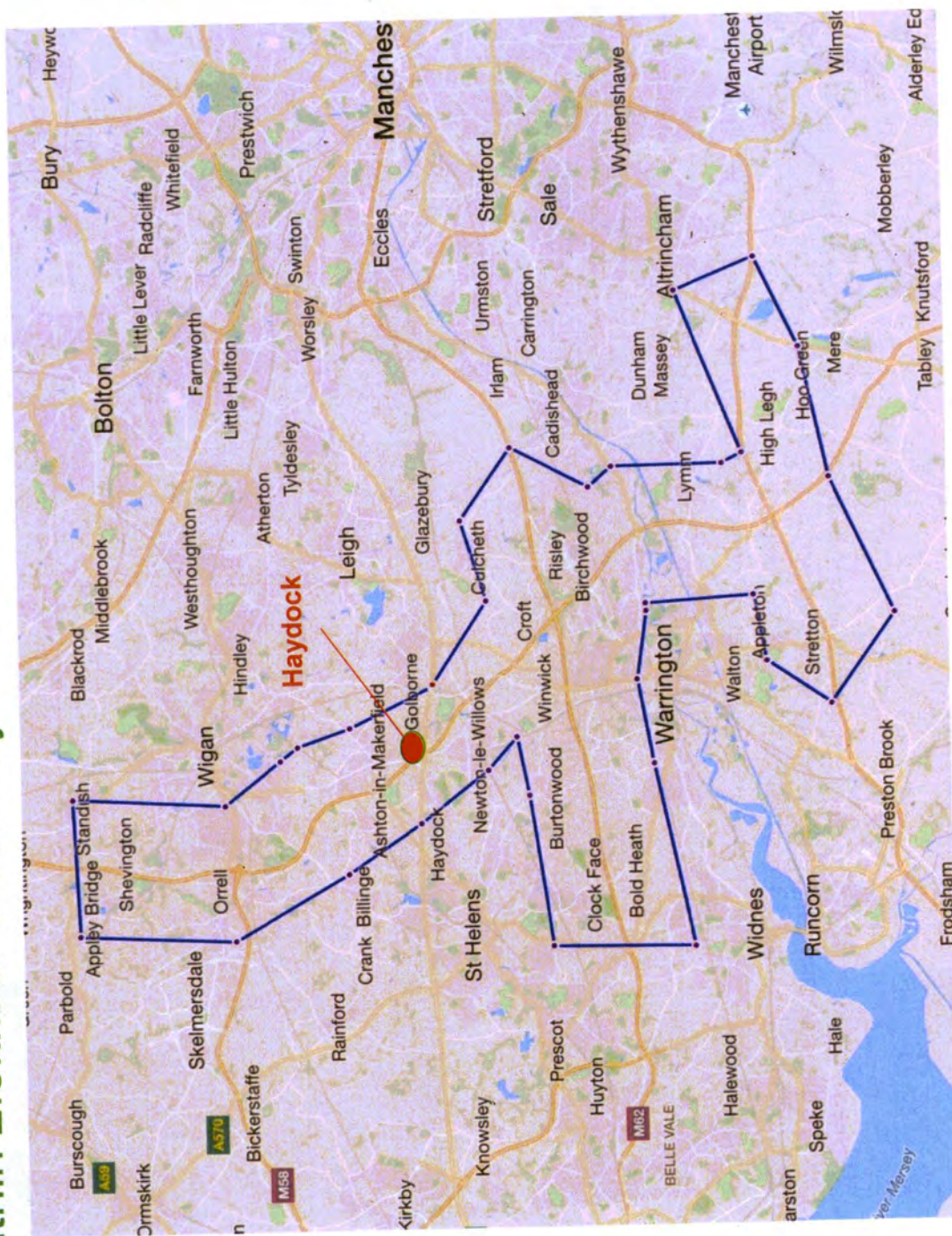
**NORTH WEST LAND
AVAILABILITY**



NORTH WEST LAND AVAILABILITY

Sites within 2.5km of Motorway Junctions

Sites within 2.5km of Motorway Junctions



NORTH WEST LAND AVAILABILITY OTHER SITES

- Detailed below are sites located within 2.5 miles of a motorway junction which could be considered by future logistic requirements
- Prime sites including Omega South have seen recent success due to the land being "oven ready" which is a key driver for occupiers when identifying new sites to expand/relocate their businesses
- Secondary sites including Skelmersdale and Widnes are unlikely to compete directly with sites such as Haydock due to being further from the motorway and thus increasing occupational costs
- Canmoor's site at Haydock Lane can only procure a single unit of 300,000 sq ft and as such cannot satisfy larger RDC requirements as per Page 18 above
- M6Major.com only has 5 acres remaining following D&B letting to Amazon and 523,500 sq ft speculative development
- CBRE believe current "Prime" sites at Omega Warrington and Icn are likely to be fully occupied within the next 12-18 months due to current demand in the marketplace

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMMENTS
Former Parkside Colliery Site Newton-le-Willows	c 4m sq ft	1230	Land	Site being promoted in 2018	Phase 1 – 1m sq ft application submitted Further phases to follow over next several years JV promotion between St Helens MBC and Langtree
Omega South Skyline Drive Warrington	750,000	40	Land	Outline planning permission granted for B2/8	40 acres remain - can accommodate c 750,000 sq ft - largest single institutional unit developable is c 300,000 sq ft
Icon Manchester Airport	550,000	30	Land	Outline planning for 1.4 million sq ft.	Site acquired in 2017 by Icon Industrial. 2 deals in 2019 (170,000 sq ft a& 103,000 sq ft). Site can accommodate a single unit of c 400,000 sq ft
Gorse Lane Widnes	500,000	40	Land	Former manufacturing facility with B2/8 use	Design to Suit only at this stage. Acquired by Marshall CDP. Surrounding uses include recycling. Site likely to target similar uses
Haydock Lane Haydock	300,000	20	Land	Outline planning permission	Canmoor. Site adjacent to Bericote. Initial 20 acres being promoted. Expansion land behind to be promoted at later date
GPark Skelmersdale	330,000	42	Land	Outline planning permission	D&B site. Maximum single unit developable is 223,638 sq ft

NORTH WEST LAND AVAILABILITY

NORTH WEST WIDE SITES

- Detailed below are “oven ready sites” with planning consent located away from the M6 corridor which are likely satisfy demand from occupiers who need to service the North West/Yorkshire from a single distribution centre.
- L57 is a prime Merseyside site with planning permission to develop a single distribution of 1m sq ft, although the site is over 11 miles from the M6 motorway
- K800 Knowsley is likely to attract an occupier seeking rail connectivity or a large power supply (K800 can supply 8 MVA), but is unlikely to be considered by a logistics operator due to the distance from the M6 corridor which provides connectivity to the North and South of the UK
- Access 661 is located adjacent to Logistics North in Bolton (currently has no available sites)

ADDRESS	SIZE (sq ft)	ACRES	QUALITY	AVAILABLE	COMMENTS
L57 Stonebridge Logistics Park Liverpool	1.1 million	55	Land	Planning permission granted for single unit of 1m sq ft	Site being promoted jointly with Liverpool CC
K800 Knowsley	800,000	45	Land	Planning for 800,000 sq ft	Design to suit. 8MVA power supply
Access 661 Wingates Ind Est Bolton	500,000	22	Land	Outline planning permission	Site currently being sold to new developer

08

HOW HAYDOCK POINT CAN
SATISFY FUTURE
OCCUPIER DEMAND



HAYDOCK POINT – SATISFYING FUTURE DEMAND

- Current demand for Grade A / New distribution accommodation in the North West continues to grow, however, supply of Grade A supply stands at only 12 months' supply
 - *Haydock Point can satisfy future demand assuming consented*
- There is no supply of existing buildings of Grade A specification in excess of 600,000 sq ft in the North West
 - *Haydock Point can procure a single building of this size*
- Occupiers demand "prime" development sites to house new RDC buildings which ideally need to be located within close proximity of major motorways such as the M6 motorway.
 - *Haydock Point can satisfy this need*
- Demand from occupiers for 300,000 sq ft plus Design & Build schemes has increased over the past few years with keys deals including Movianto, Haydock (370,000 sq ft), Amazon, Haydock (360,000 sq ft), to name but a few.
 - *Haydock Point can satisfy demand of this size*
- Supply of "Oven Ready" consented sites within 2.5km of motorway junctions is limited. Major North West schemes including Omega Warrington, Logistics North Bolton, Kingsway Rochdale and Global Logistics Manchester Airport, cannot accommodate a single building in excess of 500,000 sq ft
 - *Haydock Point can accommodate a single unit up to 990,000 sq ft*
- Occupiers are demanding high bay distribution facilities with eaves height in excess of 15m in order to maximise storage capacity and reduce overall operational costs
 - *Haydock Point can satisfy these needs*
- Minimising operational costs by locating distribution facilities close to motorway junctions is a key requirement for logistic occupiers
 - *Haydock Point is located immediately adjacent to Junction 23, M6 motorway*
- The rise of e-commerce demand will drive take-up of increased distribution units throughout the UK
 - *Haydock Point is ideally located to satisfy these demands*

Source: CBRE

CBRE Logistics data covers units of 100,000 sq ft only

Turley Office
1 New York Street
Manchester
M1 4HD



**Appendix 3: Haydock Point South site
prospectus**



Haydock Point South

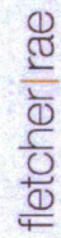
Site Prospectus
FEBRUARY 2016



Prepared for



by



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- Eastern Growth Area - the Proposition
- Haydock Point South

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- Strategic Priorities
- Local Needs

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- Social and Economic Benefits
- Environmental Benefits
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Appendix 1 - Strategic Drivers

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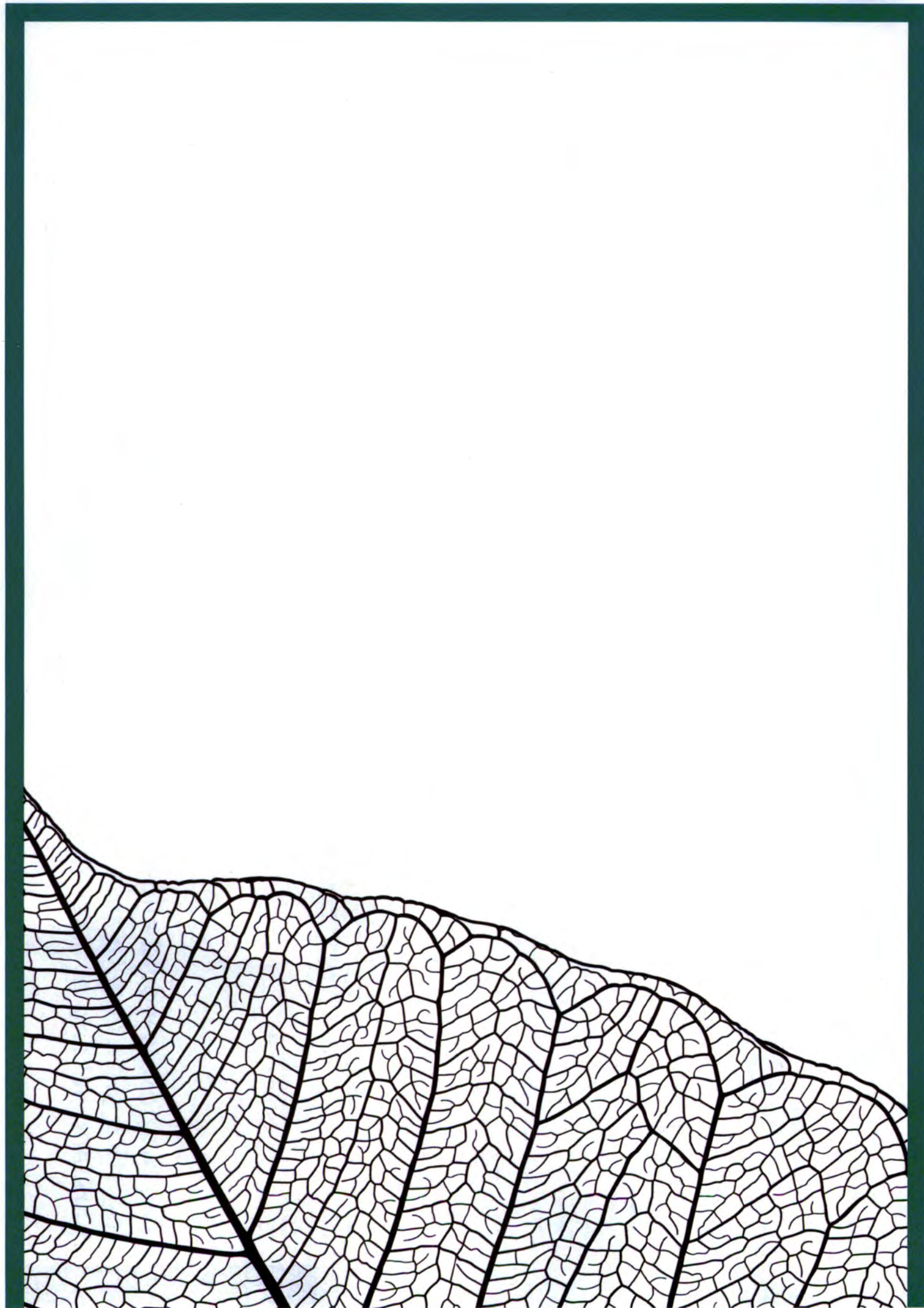
Appendix 4 - Peel Group

References



01. INTRODUCTION

- Growth and Prosperity - St Helens
- Eastern Growth Area - the Proposition
- Haydock Point South



1. INTRODUCTION

Growth and Prosperity - St Helens

St Helens Council is now progressing a new Local Plan. In doing so, the Council is grasping the need to plan positively to realise its growth objectives, including through necessary Green Belt review.

Peel Holdings (Land and Property) LTD (Peel) is committed to playing a structural role in the economic growth and improved prosperity of St Helens by bringing forward employment proposals at Haydock to attract regional growth sectors that are locating in the North West and UK.

The ambition is to work with St Helens Council and its partners to create an Eastern Growth Area for St Helens, centred upon Haydock, Parkside and the M6 corridor, as a gateway to the Borough and a key contributor to the wider City Region.

Haydock's position on the interface of the M6/A580 means it is uniquely placed to enable St Helens to create employment in the key growth sector of logistics and respond to strategic priorities of the Northern Powerhouse, Liverpool City Region, Local Enterprise Partnership (LEP) and Atlantic Gateway.

SuperPort recognises the game changing investment in Liverpool2 port facilities and the opportunity to create a globally significant multi-modal logistics hub with facilities present across the Liverpool City Region. There are multiple drivers of demand for high quality logistics space that is in the right place and of the right format.

It is clear from evidence gathered by the Council to date that the scale of need is significant and cannot be met by existing sites or land in the urban area alone. Urban extension is required and should be directed to sustainable and accessible locations that respond to specific market demands. Green Belt review will be required.

Haydock Point South provides a direct response and the means to deliver a significant logistics-focused development, independently or alongside a wider employment and housing development, in a highly accessible, sustainable and prime location.

Eastern Growth Area - the proposition

The proposition is to position Haydock and Parkside as complementary significant investment opportunities connecting St Helens to the road and rail logistics growth corridors of the North West.

Parkside is a significant development site sitting alongside the M6 and the West Coast mainline, with potential to develop a rail based inter-modal freight centre. It will be delivered through The Parkside Regeneration LLP¹. It is understood that work is ongoing on a development strategy to secure the longer term economic benefit of the site.

Haydock presents the opportunity for St Helens to deliver high quality logistics premises in the short-medium term.

The 27 ha of land at Haydock Point South is ideally placed to provide logical extension to the existing employment area at Haydock Industrial Estate with direct connection to the M6 and A580.

It is one of three areas of land at Haydock that can be delivered by Peel to meet growth and development needs for employment and new homes in a highly sustainable and attractive landscape setting through the delivery of:

Haydock Point South: a logistics hub of 775,000 sq ft of high quality logistics/employment premises - well located to junction 23 of the M6.

Haydock Point South

This Site Prospectus has been prepared on behalf of Peel. It promotes the allocation of the land at Haydock Point South to the immediate south east of Junction 23 of the M6 for employment (logistics) development in the emerging St Helens Local Plan.

It sets out why the land should be released from the Green Belt to help meet the employment needs of the Borough, the potential of the land in terms of development quality and capacity, the sustainability and technical suitability of the land for development, and the significant local and wider benefits that would arise from its development.

Haydock Point North: a logistics hub creating around 1.5 million sq ft of high quality logistics premises - well located on the M6 corridor, north of junction 23.

Haydock Green: a development of up to 750 homes as a sustainable extension to the established residential neighbourhood of Haydock to the west.

These development areas are supported by:

Haydock Parkland: a high quality green infrastructure of connecting native woodlands, tree groups, grasslands and watercourses linking new development with Haydock, Lyme and Wood Pitts Country Park and the immediate landscape setting.

Haydock Gateway and Connections: a high quality gateway into St Helens and the Liverpool City Region for those arriving along the M6 and A580, with landscape improvements around Junction 23 and the M6 and A580 approaches.

Associated prospectus documents for these areas have been prepared by Peel confirming the benefits of the delivery of growth at Haydock. Each site is capable of independent evaluation and delivery, but a comprehensive and integrated development proposition would convey maximum benefit.

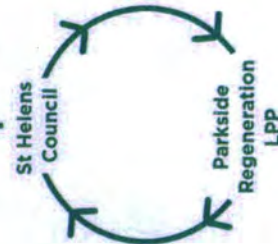
The proposals would allow St Helens Borough to capture large scale logistics growth with associated job creation in a strategically planned parkland setting at a key gateway to the Borough and the City Region.



Eastern Growth Area; Liverpool City Region Context

Eastern Growth Area

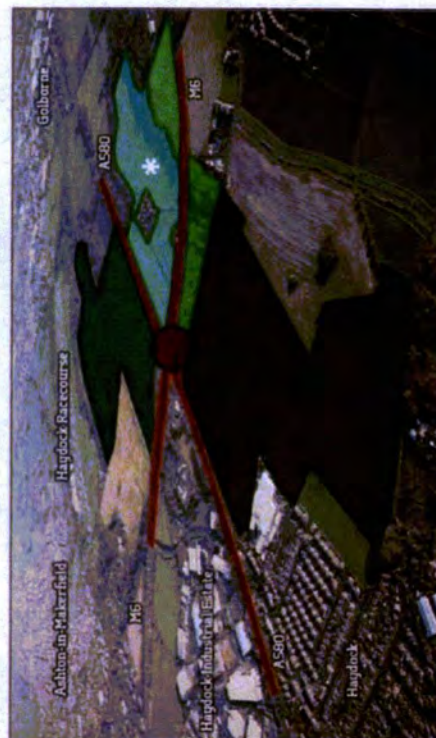
Parkside



Haydock



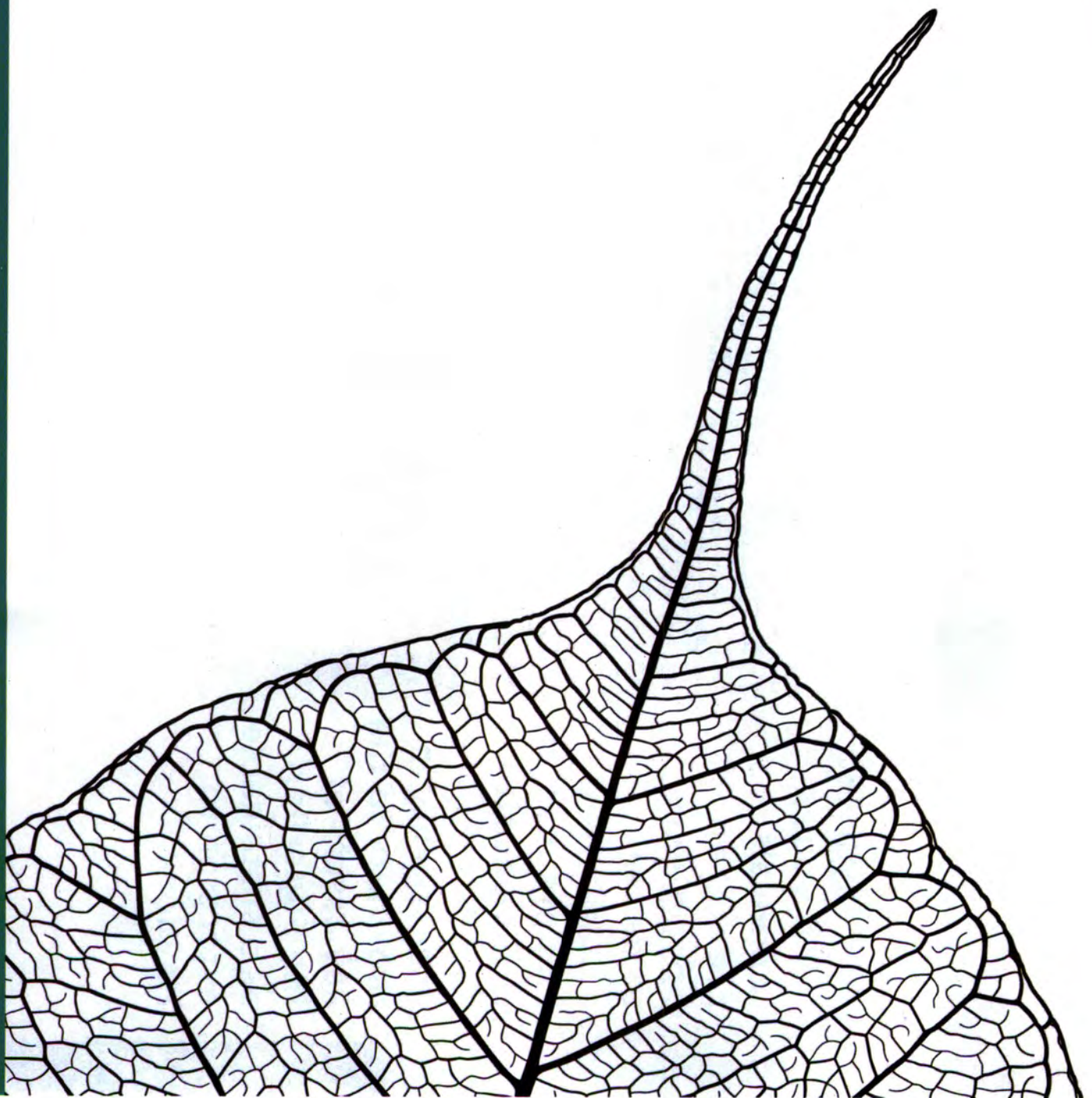
Haydock Point South





02. STRATEGIC PRIORITIES

- St Helens Needs and Priorities
- Strategic Priorities
- Local Needs



2. STRATEGIC PRIORITIES/LOCAL NEEDS

The Haydock Point South proposals present an opportunity to deliver suitable land and premises of sufficient size, quality and accessibility to the proximity to the key assets of the SuperPort as a sustainable extension to Haydock.

St Helens Needs and Priorities

There are clear needs and priorities for employment development in St Helens Borough in the next 15+ years. These reflect the:

- strategic priorities in the region arising from the Northern Powerhouse, Liverpool Local Economic Partnership (LEP), City Region Devolution, SuperPort and Atlantic Gateway;
- local needs for tackling ongoing unemployment, ensuring the supply and delivery of appropriate employment land in the Borough, whilst providing increased opportunities for modern employment growth sectors.

There is a need to plan for growth in the Borough for the period to 2033 and beyond. This will be informed by local economic needs and opportunities and strategic priorities as set out below and in Appendix 1.

The preparation of a new Local Plan will allow this growth requirement to be addressed and spatially expressed via land allocations.

This Prospectus² confirms how land at Haydock Point South can enable St Helens Borough to provide for its employment needs and growth aims, enabling it to compete in the modern industrial market place and conveying significant economic benefit.

Strategic Priorities

Liverpool City Region, including St Helens Borough, is a key element of the Government's Northern Powerhouse, which commits to the growth of northern cities to rebalance the UK economy and help the north to compete on the world stage.

Key priorities of the Northern Powerhouse include economic growth and investment in jobs, skills and transport connections. Focus is being placed on the expansion of the logistics sector and port centric warehousing needs to provide for growth and jobs. The 2015 Northern Transport Strategy 'One Agenda, One Economy, One North' commits to multi-modal freight improvements and investment³ to support the SuperPort and Peel Port's investment in the new container terminal at Liverpool2 which will see significant increases in trade and container arrivals to the north west region.

The Liverpool City Region LEP is a key driver of economic development and a leading partner in the City Growth Deal agreed in 2012/14 and emerging Devolution proposals along with the six Merseyside authorities, including St Helens Borough. Its focus is also on the delivery of strategic economic development, via economic growth, transport improvements and the development of key growth sectors including SuperPort.

The 2014 LEP Report 'Liverpool, City Region SuperPort Market Analysis Land and Property'⁴ sets out the considerable opportunities presented by SuperPort to regional economic growth and job creation across the local authorities:

- over £1 billion investment in the Liverpool City Region in logistics infrastructure to significantly enhance the region's attractiveness for logistics operators;
- potential to create 30,000+ jobs in the next 20 years;
- requirement for 400 – 500 hectares of high quality available logistics sites to meet the anticipated significant increase in trade and associated services.

To meet the growth opportunities, the study outlines key requirements for the logistics sector to service the SuperPort requirements and prevent logistics operators locating outside of the region of:

- large available sites of 5ha+ capable of accommodating large units
- ready access to transport links; and
- proximity to established residential neighbourhoods and markets.

The key requirements of the logistics sector for large, well located and accessible sites are also recognised in recent reports of the British Property Federation⁵ and Colliers⁶.

The BPF report, drawing on the 2015 Ibis World Report⁷, outlines that 'growth will only be possible through the provision of the right space in the right locations – a lack of high quality warehouse space in proximity to urban centres is currently a limiting factor. This will need to be supported via appropriate planning policy, land allocations and planning permissions'

As a major landowner, investor and developer, Peel support the Northern Powerhouse, its growth focus and the benefits that wider economic growth can bring to the region and its population. In its report 'Peel in the Northern Powerhouse', the benefits of logistics in the north are specifically acknowledged, including better connectivity to markets, stimulating growth and jobs and providing opportunities to reduce the financial and environmental costs of movement and congestion⁸.

Local needs
Recent national economic conditions and the traditional economic base have influenced the socio-economic conditions and growth needs of the Borough of St Helens.

Whilst there have been some improvements in the Borough's economic position over recent years, the Borough remains static in respect of issues of multiple deprivation:

- It remains amongst the highest most deprived authorities in the country at no. 36 in England (Index of Multiple Deprivation 2015 (51st in 2010)) and a number of wards remain in the top 5% of the most deprived nationally (IMD 2015)
- Youth and long term unemployment and the numbers claiming job seekers allowance are higher in St Helens than regional and national levels.
- Wage levels are lower than the national average.

It is therefore critical that St Helens Borough is able to attract private sector investment to address these challenges.

The Council's "City Growth Strategy" and "St Helens Growth Plan 2015-18"⁹ aim to expand the employment and skills base of the Borough workforce and recognise the opportunities of sectors to deliver the growth agenda in the short-medium term. Logistics is seen as having "significant potential", exploiting the Borough's strategic location on the transport network and its access to large urban populations in the Liverpool City Region, Greater Manchester and beyond.

Evidence base reports prepared for the Council to inform the Local Plan (AECOM/ BEGroup¹⁰) highlight the issues of existing and underused employment areas within the Borough and the mismatch with the growth and locational requirements of the modern logistics sector.

The loss of employment land to other uses and the lack of realistic and viable alternative sites in the existing settlement boundaries has resulted in the Borough losing out on logistics opportunities with no major new developments or operators locating in the Borough over the last 5 years¹¹.

The need for employment growth in the Borough and the requirement to account for the uplift in logistics growth fuelled by SuperPort is widely acknowledged and considered further in Section 4. The locational advantages of the Borough's position on the M6 corridor is also widely acknowledged by the evidence.

To achieve employment and logistics growth the Council's evidence recognises that the Borough needs to provide a new and larger stock of accessible high-quality large sites and premises fit for modern businesses. Providing accessible sites on key strategic motorway junctions is specifically recognised with first preference to be given to sites in close proximity to a junction on the M6, such as sites at Parkside (as a longer term option) and the **available land at Junction 23**¹². Such sites are recognised as requiring consideration for allocation in the emerging Local Plan, including via review of the Green Belt¹³.

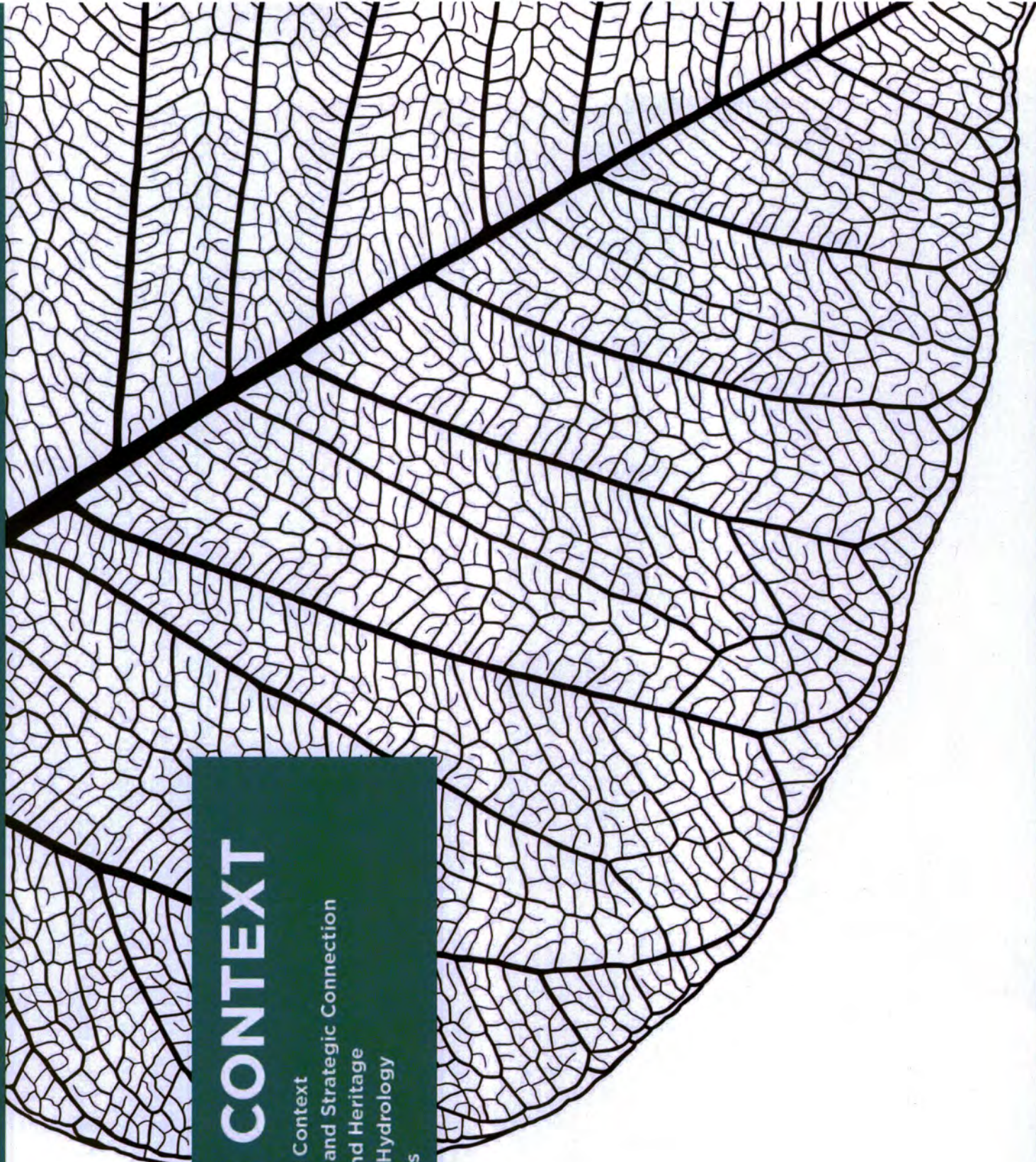
Priorities

In response to these drivers, key priorities for the emerging Local Plan should therefore comprise:

- Supplementing the established employment areas of Haydock Industrial Estate and M62 Corridor with highly accessible, large scale growth points that will meet the needs of the evolving development sectors, including large-format logistics operators.
- Achieving accessible and deliverable development options, with the critical mass to take advantage of the Borough's infrastructure and locational advantages of the strategic road network and proximity to major growth drivers in the Liverpool / Manchester City region, and capturing market demand.
- Achieving sustainable urban extension that addresses the reducing numbers of suitable urban and brownfield sites including via a review of the Green Belt to accommodate this growth.

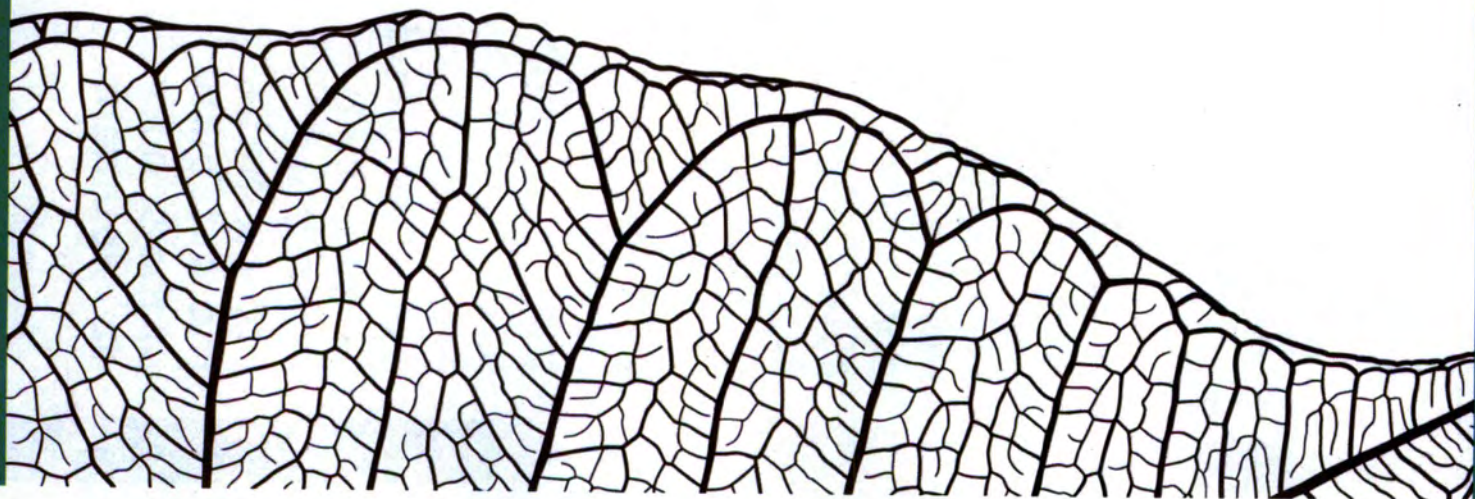
St Helens Borough employment site supply issues	Logistics sector requirements
Sites positioned away from the M6 corridor	M6 corridor is the key 'area of search' for logistic operators looking to invest in St Helens and the North West
Developed out to varying degrees and constrained	Require sites of 5ha+ capable of accommodating clusters of larger format buildings
In need of significant investment in remediation and/or infrastructure resulting in medium to longer term delivery timescales	Short term and flexible delivery
In close proximity to, and in most cases accessed via, established residential neighbourhoods and local community hubs	Unconstrained sites to allow 24 hour and large volume HGV access

Haydock Point is a key project within the Ocean Gateway and Peel Logistics investment strategies. The proposals can be aligned with Peel's own wider regional investments and those of public and private sector partners.



03. SITE CONTEXT

- Location and Context
- Accessibility and Strategic Connection
- Landscape and Heritage
- Ecology and Hydrology
- Other matters



3. SITE CONTEXT

Haydock Point South is suitable for employment, development, and is not subject to technical or environmental constraints that cannot be addressed through design and mitigation. Technical assessment and Sustainability Appraisal demonstrate the suitability of the site for development.

Location and Context

The 27 ha of land is located on the south east quadrant of Junction 23 of the M6/A580 roundabout between Haydock in the west and Ashton in Macclesfield/ Golborne in the east/ north east (in Wigan Borough).

It extends along the strategic road infrastructure to form an easterly extension of the urban area of Haydock.

It comprises open, flat agricultural land with boundary hedgerows and woodland plantations. A small number of ponds/dams and watercourses cross the site.

A residential care unit lies central to the site but falls outside of its boundaries. Two residential properties are also located on the western boundary of the land.

The land lies within the Green Belt that separates the settlements of St Helens and Wigan Boroughs. There is adequate physical separation present between the site and the surrounding settlements.

Accessibility and Strategic Connection

The site has excellent connections to the strategic road network with direct connection to the M6 in both directions via Junction 23. This allows onward connection to the regional motorway network of the M62/M58/M61 and to major centres and facilities in the North West and beyond i.e. Port of Liverpool, airports and the major conurbations (Manchester/ Liverpool/ Preston). Junction 23 has recently been subject to improvement works to assist flows through it.

The land has direct site frontage to the A580 that allows site connection to the highway network.

The site is accessible by bus – via services along the A49 at the north east corner of the site and the A580. There is also footpath/ cycleway connection along the A580 to Haydock to the west and along the A49 towards Ashton in Macclesfield to provide access to surrounding settlements and local services. Newton le Willows station is located c2km from the land.

Landscape

The visual context of the land is largely influenced by the adjacent road infrastructure of the A580 and M6, particularly the elevated section of the M6 which represents a key urban feature in the landscape. Boundary landscaping and plantation woodland provide a strong boundary and visual screen of the land from the east and south and limit long range views. The historic Parkland landscape historically present across the land has now largely been lost and does not provide a constraint to development.

The location of the residential care unit within the site is important to take account of. This can be accommodated in the site masterplanning by means of unit location, orientation, separation and landscaping.

Ecology and Hydrology

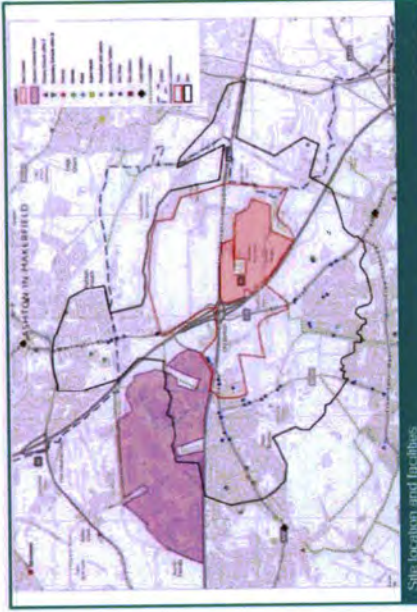
A number of woodlands and ponds are present within the site which provide a range of habitats; Ellam Wood at the south forms part of a wider area of woodland that is subject to a Tree Preservation Order.

Initial site surveys have not identified any species of protection on the land, albeit trees have potential for breeding birds and bats. Further surveys will be undertaken at site development stage as necessary but the scale of site and limited areas of value provide significant development opportunity. The land is not constrained by any flood risk.

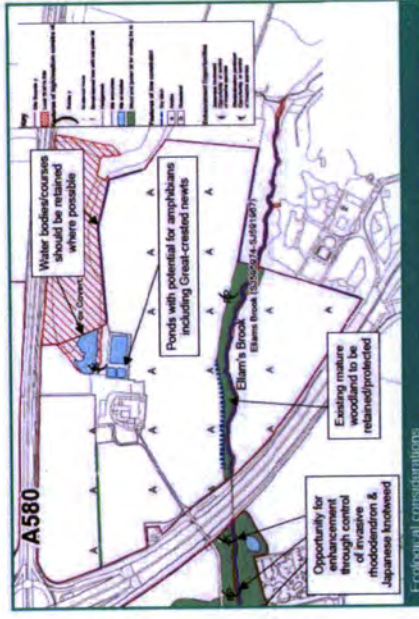
Other Matters

There are no ground conditions, utility or technical matters that constrain the land from development.

Further technical assessment is provided in Appendix 2 and a Sustainability Appraisal is provided in Appendix 3 (which draw upon a series of technical studies of the land). These highlight that there should not be any significant or insurmountable constraints to future development of the land for logistics/employment. It is concluded that there are no technical reasons to prevent allocation of the land for future development.



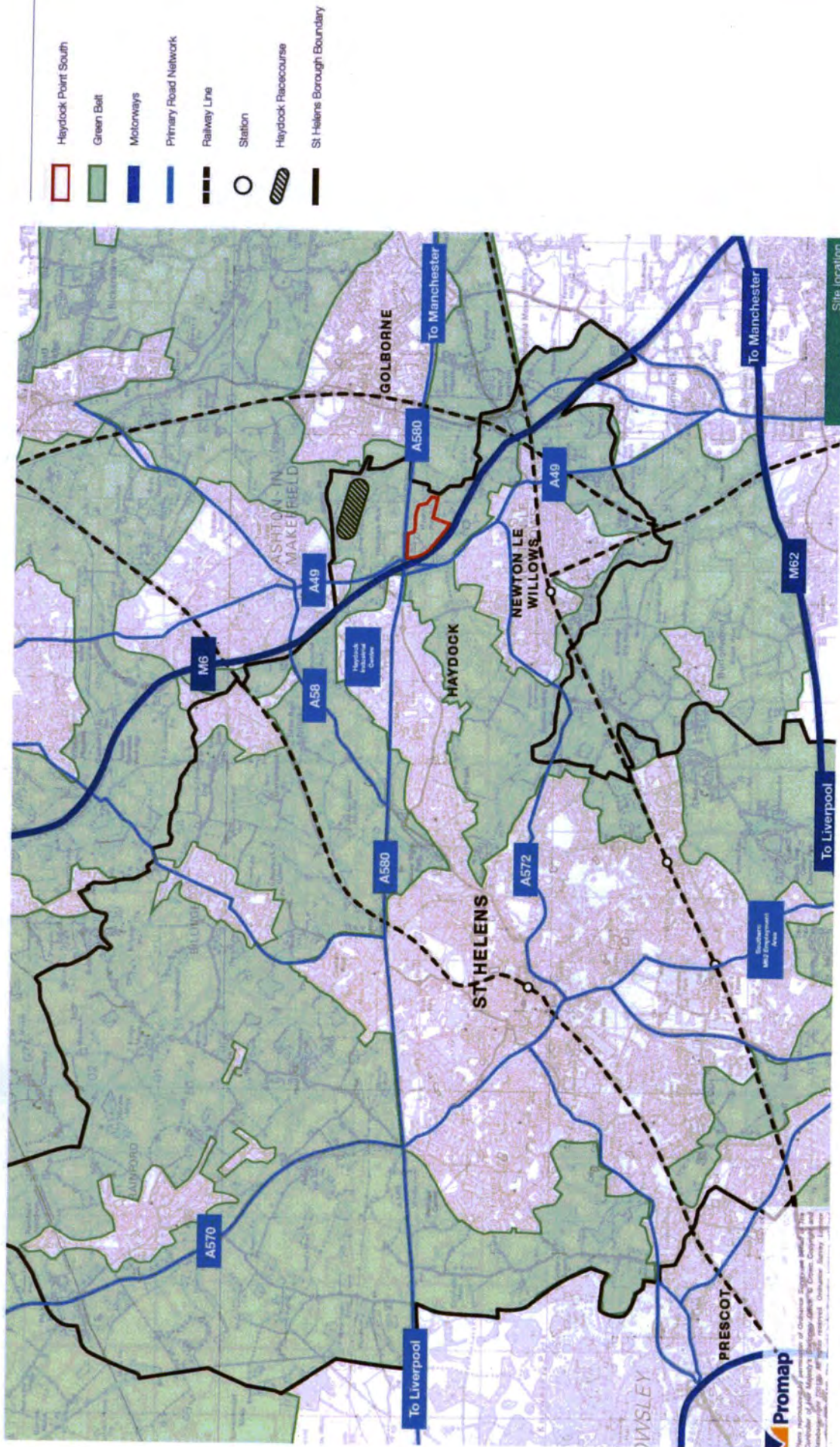
Site location and facilities

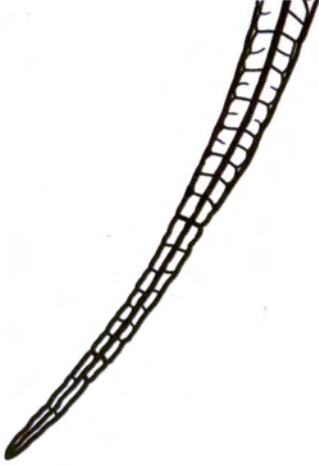


Ecological considerations



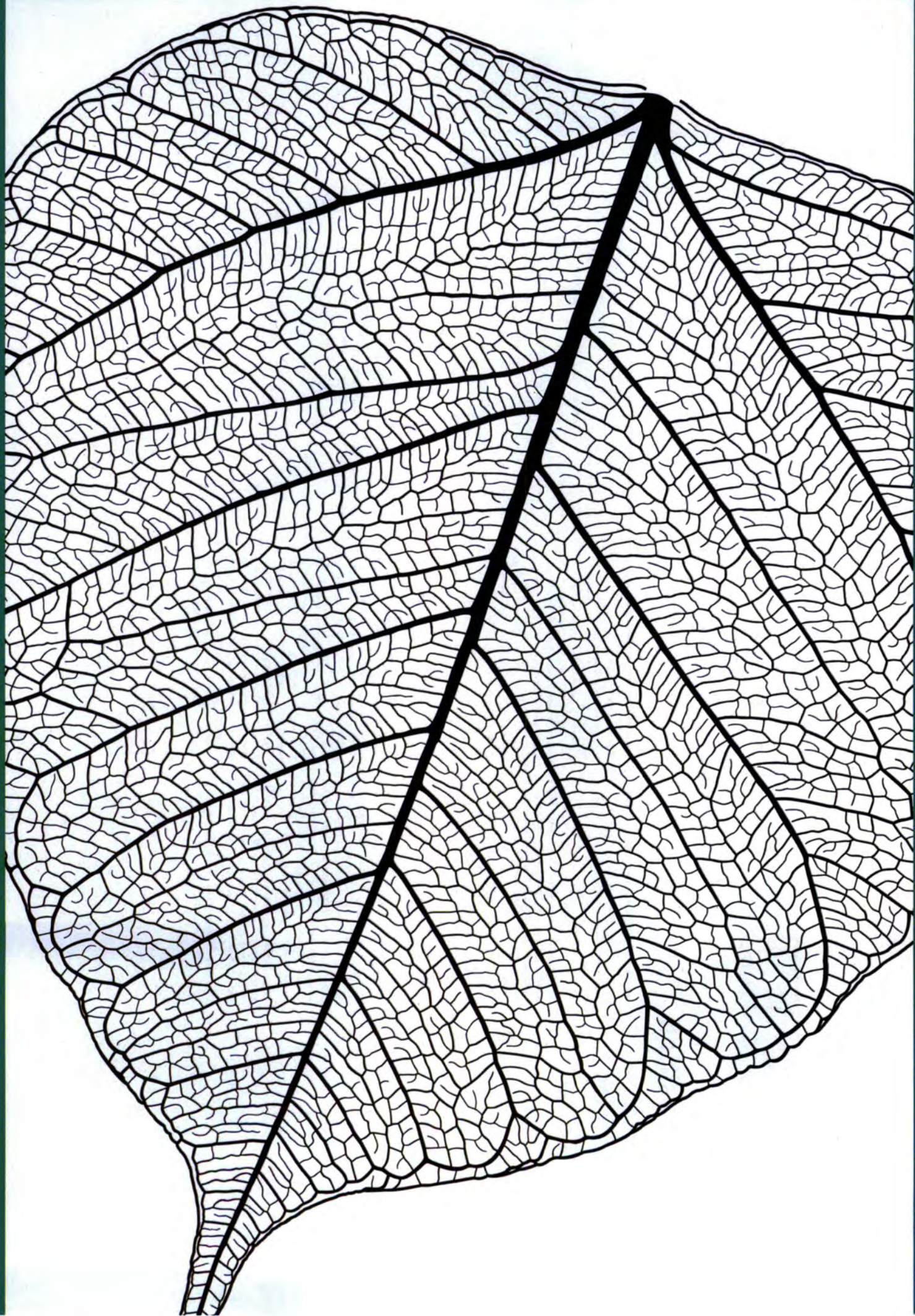
Landscape Considerations





04. PLANNING POSITION

- National Context - Achieving Sustainable Development
- Sub Regional Context - Economic Drivers
- Local Context - Accommodating Needs
- Green Belt Review to Accommodate Growth Needs



4. PLANNING POSITION

The proposition is a direct response to the need to build a strong, responsive and competitive local economy.

Haydock Point South is a solution to meeting identified needs – for employment space of the right type in the right place at the right time.

The need for Green Belt release in the Borough is recognised – Haydock Point South offers an opportunity to accommodate growth needs in a strategically planned manner whilst retaining an effective Green Belt that serves its purposes.

National context – sustainable development and Green Belt review

National policy¹⁴ outlines a presumption in favour of sustainable development via positive growth and social, economic and environmental progress. Local planning authorities should positively seek opportunities to meet the development needs of their area and positively drive wider opportunities for growth. Market signals and the suitability of land to meet needs are critical considerations.

The Green Belt remains of great importance, in preventing urban sprawl and by keeping land permanently open, however exceptional circumstances can necessitate and justify Green Belt release. Meeting development needs and the absence of reasonable and sustainable alternatives represent such exceptional circumstances.

Green Belt release should also avoid the need for further boundary review in the next Plan period via 'safeguarding land' to meet longer term needs and foster clearly defined, permanent boundaries.

Peel believes the proposals for Haydock would achieve these objectives.

Drivers for Change Sub-regional - economic drivers

As referenced in Section 2, there are clear economic growth priorities in the Northern Powerhouse and Liverpool City Region to increase investment and jobs by combining public and private sector activity.

SuperPort and the Atlantic Gateway will develop international and national trading opportunities and improve the transport and infrastructure assets of the North West.

Increases in trade and economic growth arising from this investment as well as current unmet demand from growth sectors will require additional land and logistics hubs to sustain growth and the significant economic benefit.

The Borough location, level of demand and providing the necessary sites and infrastructure to deliver the growth requirements to lift the local economy are critical issues that the Council must address through the development plan process.

Local context – accommodating needs

Recent evidence base reports undertaken for the Council to inform the emerging Local Plan (AECOM/ BEGroup¹⁵) confirm the need for additional employment land and premises in the Borough based on historic land take-up rates; population growth and the requirement to account for the uplift in logistics growth fuelled by SuperPort; it is also recognised that there are no large scale employment sites available in the Borough for logistics use. This has resulted in a

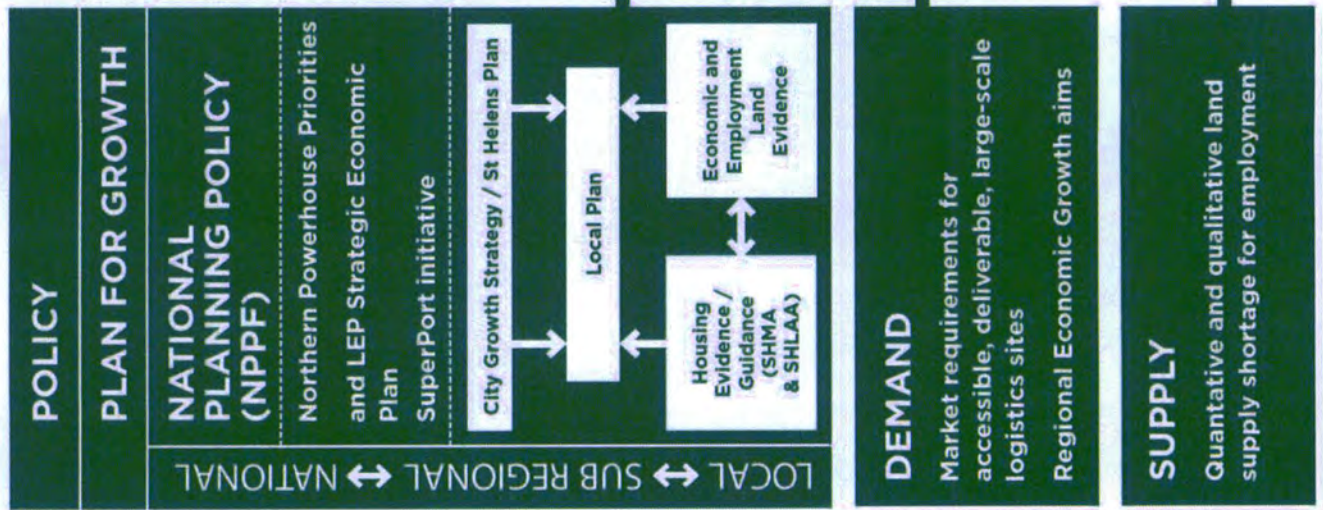
figure of 178ha of employment land required for the period 2012-2033, of which 100-130ha would be for B8 storage and distribution use, with up to 70% of that land growth required for large format operators.

In spatially expressing this need, particularly in respect of logistics, the evidence concludes that key factors informing appropriate land allocations will be:

- the lack of realistic and viable alternative sites in the existing settlement boundaries,
- need for large deliverable sites and
- the locational advantages of the Borough's position on the M6.

Specifically, land in proximity to junctions on the M6 is concluded to be first preference for exploiting operator needs, with available land at junction 23 of the M6 seen as a **key site to secure logistics development** (particularly in advance of Parkside which is considered a longer term option).

Concept Drivers



PLANNING REQUIREMENTS

Shortage of long term land supply

Need and demand for more land for large scale employment sites

Green Belt Review to facilitate economic growth

Allocation of sites to enable delivery

HAYDOCK STRATEGIC ADVANTAGES

Haydock is located on the intersection of the M6 J23 and A580, therefore having a strategically and locally accessible and attractive location

Haydock is capable of achieving large scale logistics development as a sustainable extension to the existing Haydock community

Haydock can be strategically planned and delivered as a high quality investment by Peel in partnership with the Council and local community

Green Belt Review to Accommodate Growth Needs

There are exceptional circumstances requiring a review of the Green Belt in St Helens Borough to enable employment (and other) development needs to be accommodated.

In addition to meeting employment needs in the Plan period, further land to sustain long term Green Belt boundaries is required.

A revised Green Belt around Haydock Point South can be permanent, long term and defensible and maintain clear separation between settlements.

Release of the Haydock Point South proposals from the Green Belt and the alternative Green Belt boundary proposed in this location is an appropriate response as:

- there is need and opportunity to create a strategic investment location at the intersection of the M6 and A580 meeting the requirements of the logistics sector and as a sustainable extension to Haydock;
- separation between settlements will be maintained and no merging of settlements will occur;
- a revised permanent Green Belt boundary can be created by using existing and reinforced features to enhance definition, and longevity;
- existing major urban features reduce the openness of the Green Belt in this area such that its contribution to this purpose of Green Belt is already weakened.

Assessment against national Green Belt purposes and previous local Green Belt review methodology

Green Belt Purpose	Assessment against Green Belt Purpose
Preventing Sprawl	Read in the context of existing infrastructure to the west of M6 corridor. Defined by strong landscape boundaries to east and majority of northern boundary that could be supplemented to provide a permanent boundary
Merging of Settlements	Part of a generally wide gap between settlements to the east and south. Would maintain physical and visual separation between settlements in all directions
Encroachment	Existing development around the land (roads) provide a level of encroachment into the existing area. Wide boundary tree belts and roads provide strong defensible boundaries to prevent physical/ visual encroachment into the wider Green Belt area
Overall Evaluation	Strong boundaries to contain development. Revised Green Belt boundary as proposed can form a logical, permanent boundary. An appropriate Green Belt area can be maintained following release of this land.

Haydock Point South

Haydock Point South would extend the Haydock urban area eastward but would retain substantial settlement separation and provide revised and strengthened boundaries, thereby limiting urban sprawl and preventing coalescence.

The development area will provide a robust, long term defensible Green Belt boundary that will minimise impact on the strategic purposes of Green Belt and cater for development needs over the plan period.

The proposition is strongly aligned with the wider proposals around Junction 23, which represent a cohesive development solution to meeting identified needs. The proposals alongside Haydock Point North, Haydock Green and Haydock Parklands justify and derive maximum benefit from a realigned Green Belt boundary in this location.

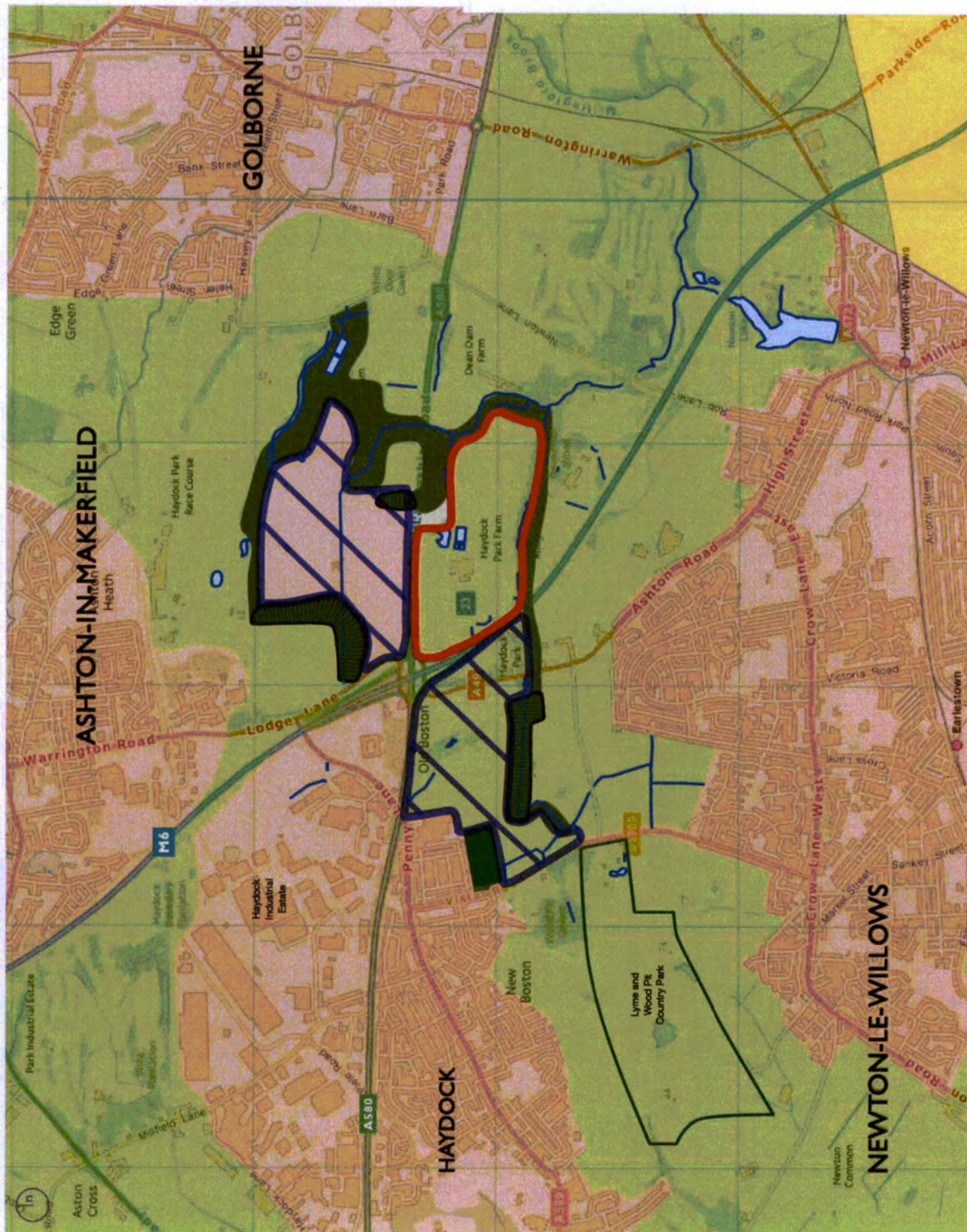
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This drawing is for illustrative purposes only and should not be used for any construction or estimation purpose.

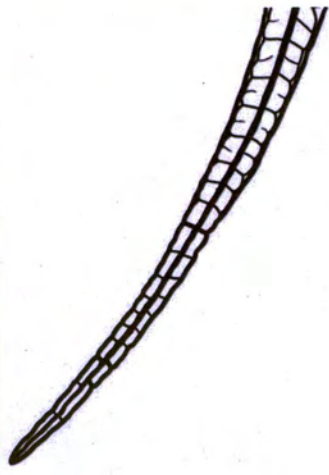
DO NOT SCALE DRAWINGS.

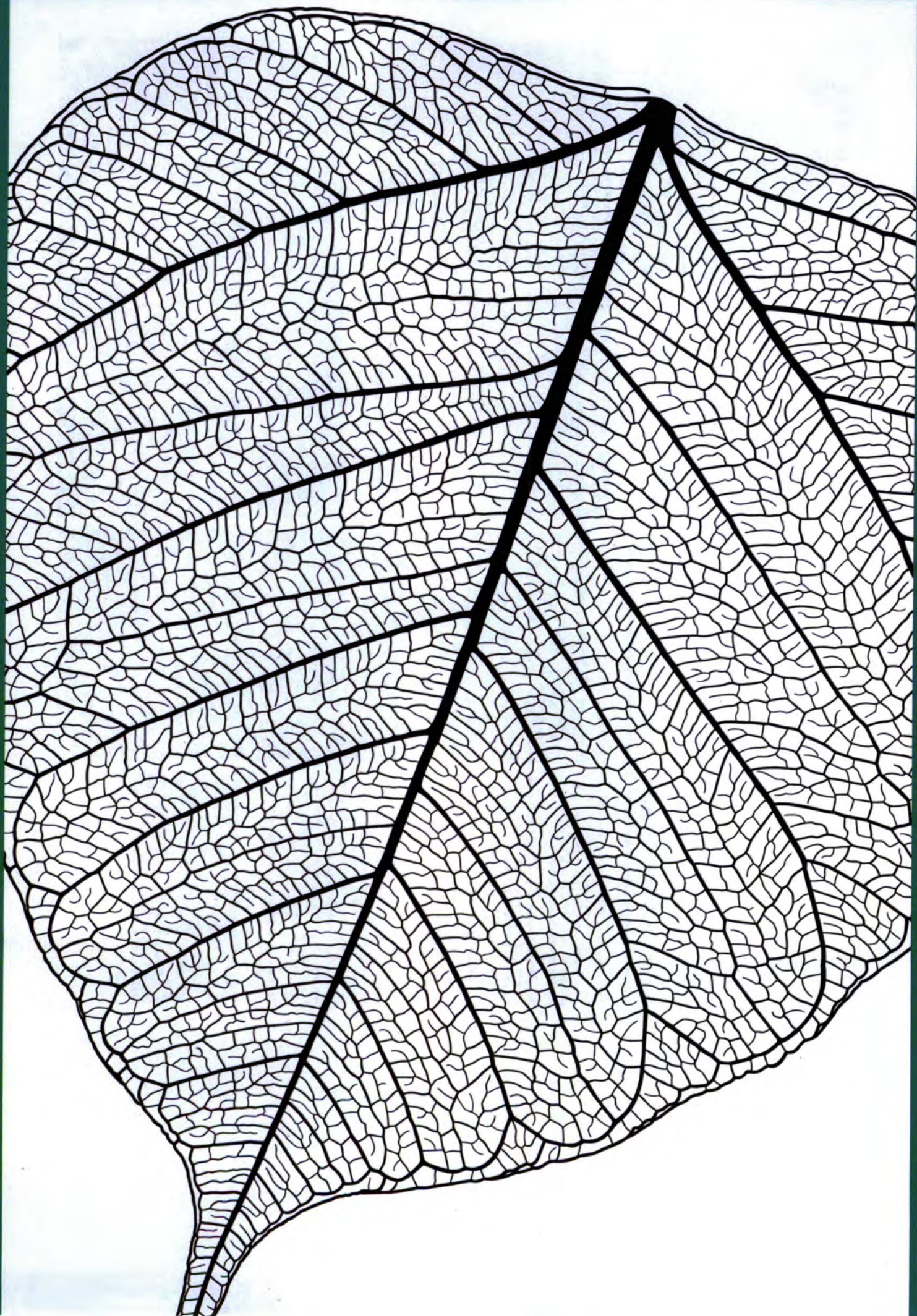
No liability or responsibility is accepted arising from reliance upon the information contained within this drawing.

	Haydock Park South
	Urban Area
	Green Belt
	Parkside Strategic Rail Freight Interchange proposal
	Playing field
	Existing woodland belts - permanent contained boundary
	Boundary to be supplemented with tree belts to form permanent boundary
	Stream / pond
	Wider Green Belt Release proposal See separate site prospectus



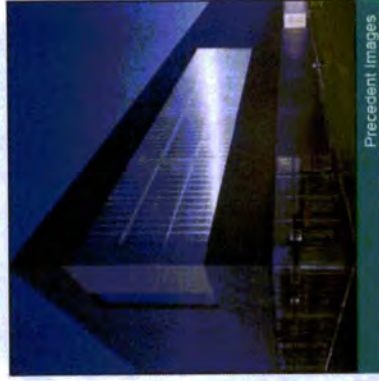
05. PROPOSALS AND FRAMEWORK







Precedent Images



Precedent Images



Precedent Images



Artists Impression - Haydock Point South. View looking along Main Avenue

Haydock Point South

The proposal is to deliver Haydock Point South as a logistics park located to the immediate south east of the M6 – Junction 23. Haydock Point South provides for around 775,000 sq.ft. of high quality logistics led employment development.

Being close to the M6 with good direct links and the ability to create a cluster of large scale premises are key requirements for logistics operators looking for investment locations across the North West.

The A580 frontage is ideal for creating a high profile, prominent gateway to both Haydock Point South and to St. Helens from the east. The visibility of the gateway from the M6 is a key advantage in attracting market interest.

The large scale, regular field pattern and generally level topography are well suited to accommodating large scale building formats. The existing well established, linked woodland groups to the east and south creates a strong landscape edge. They screen views into the site from the south and east and provide a landscape backdrop from the north and west. The existing field pattern also provides the structure for a new Parkland landscape and pedestrian and cycleway connections.

The proposal creates 2 distinct development parcels delivering:

- A** Up to 275,000 sq ft (approx) of logistics and manufacturing premises in smaller scale buildings.
- B** Up to 500,000 sq ft (approx) of logistics premises with the ability to deliver a single unit over 500,000+ sq.ft.

Key principles are to:

- 1** Deliver a cluster of large scale premises with good access and close links to the M6 corridor.
- 2** Create a high quality principal access onto the A580.
- 3** Create a well defined, interconnected landscape structure along the southern and eastern edges of Parcels A and B to form a robust, defensible Green Belt edge.
- 4** Use building massing, roofscape and materials to manage scale and appearance.
- 5** Create a high quality, attractive landscape frontage onto the A580 through native tree and understory planting and boundary treatments.
- 6** Create a sensitive landscape setting for the existing Residential Care Facility with native tree and understory buffer planting enclosing the northern and eastern boundaries, and framing views across an open Parkland landscape of native ponds, wetlands, grasslands and linked tree and understory groups to the south.
- 7** Locate lower scale buildings adjacent to the existing Residential Care Facility.
- 8** Retain and strengthen the existing hedgerow field pattern and ditches to create an interconnected landscape structure to integrate new buildings and infrastructure with the existing tree and woodland groups.
- 9** Relocate and expand the existing Fishing Ponds as part of landscape and drainage strategy.

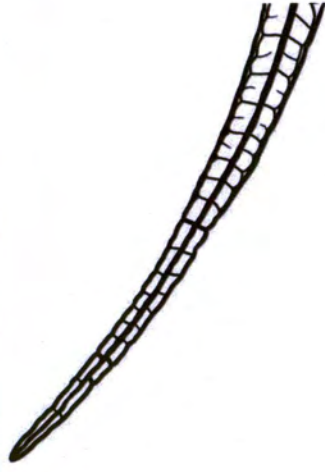


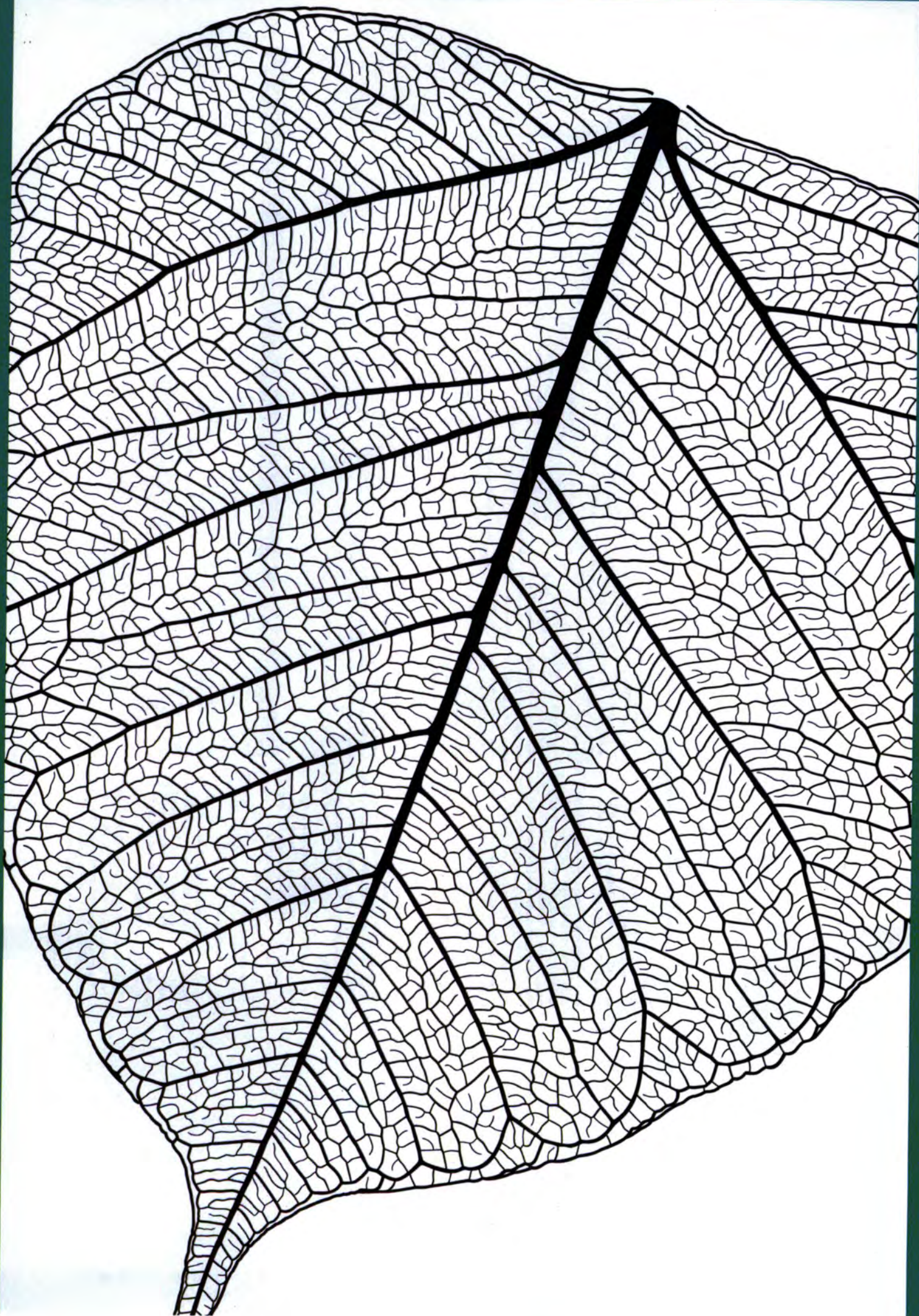
Illustrative Masterplan - Haydock Point



Location Plan

06. BENEFITS AND DELIVERY





6. DELIVERY AND BENEFITS

Delivery

The land is within the single ownership of Peel, a "willing landowner" with a proven track record of delivering high quality, large scale, sustainable logistics developments via a variety of means.

Peel Logistics has recently been established as a joint venture between Peel Land and Property and Macquarie Capital and is currently delivering a portfolio of logistics developments including sites at Port Salford and Liverpool International Business Park to support the growth of the logistics sector and SuperPort. The potential logistics development at Haydock Point could be secured through different delivery models, including by Peel Logistics, by other development companies or by specific operator tenants. The flexibility of delivery options allied to the location, profile and nature of the site will make it highly attractive to the logistics market.

Peel is committed to a long term investment in the project, and a partnership approach to working with St Helens MBC as local authority. Through such commitment and partnership, this strategically significant opportunity can be realised for the benefit of the people of St Helens and the wider sub-region.

The land is being promoted through the Local Plan process. Subsequent to policy change (the extent of Green Belt designation) it could progress swiftly to a planning application to respond to market interest. The concept masterplan shows a comprehensive development strategy for the land to deliver 775,000 sq ft of logistics/ employment development.

An indicative programme for proposals at Haydock Point South would see the delivery of employment development of the scale suggested early within the Plan period to assist in meeting the identified needs of the Borough in the short term i.e. from 2018 onwards.

The land exhibits few technical constraints, all of which can be overcome. Its adjacency to Haydock and major road infrastructure minimises the need for new infrastructure to realise the development. Where additional infrastructure or mitigation is required this can be achieved.

Sustainable Development

A Sustainability Assessment has been undertaken which demonstrates that the proposal would comprise sustainable development assessed against the relevant environmental, economic and social objectives of national policy. Technical Suitability is also confirmed - See Appendix 2 and 3.

Social and Economic Benefits

The development of Haydock Point South will have a significant and lasting positive economic and social impact for St Helens, the sub-region and the North West region as a whole (individually and in combination with the wider Haydock proposals). This will include the creation of jobs, investment in the local area and services, and uplift in business rate revenue to the Borough. A detailed and quantification of those Benefits is provided in the infographic.

Environmental Benefits

New green infrastructure benefits will arise including landscaping and ponds provided on site and around site boundaries; these will link to existing woodland areas for public access opportunities and biodiversity and habitat creation.

Linkage to a wider Haydock Parklands being considered by Peel to the South of Haydock can also be achieved. It will also provide visual and acoustic benefits to the land and care unit and afford long term defensible boundaries for the Green Belt revision.

The provision of a development that is highly accessible to the strategic transport network, SuperPort and associated growth facilities and to large populations in the major conurbations in the North West will provide transport sustainability benefits.

Conclusion

Haydock Point South is a deliverable proposal to meet current strategic and local needs for logistics and employment development in a highly accessible location. The release of the land will not harm the strategic function of the Green Belt in this area and can establish new defensible boundaries that can endure over the long term. It provides opportunity to create a sustainable urban extension set in a landscaped setting directly aligned to market demand.



Economic Benefits Summary

Construction Phase



circa £64m



627 jobs created (person years)



63 FTE (Full Time Equivalent) construction jobs



23 indirect/induced FTE jobs locally

Investment in construction of the proposed scheme

£ 4.1m GVA

Uplift in Economic output

Operational Phase - Commercial



993 gross jobs created on site



555 net additional employment opportunities for residents at St Helens



831 net additional employment opportunities for residents at the Liverpool City Region



£4.5m business rate revenue per annum, of which St Helens Council could retain 50%

£ 39m GVA

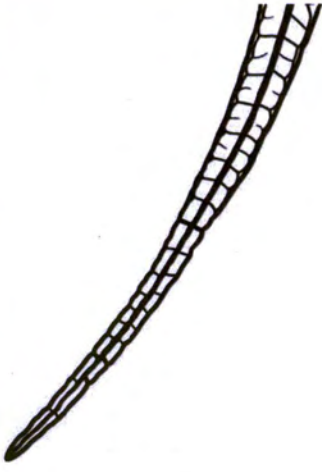
Uplift in Economic output

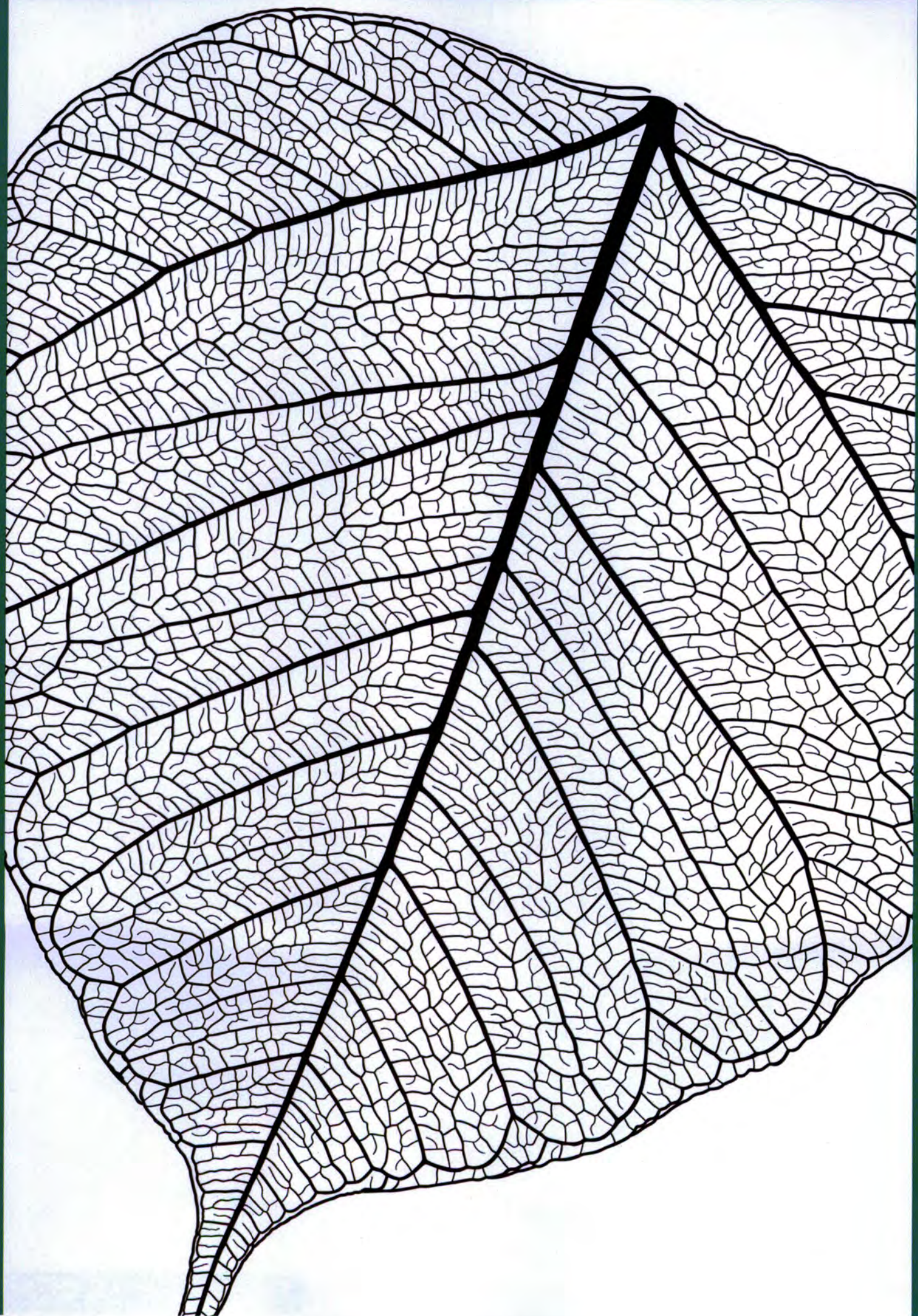
In Conclusion

Haydock Point South can be delivered by Peel in collaboration with stakeholders to create new jobs and a new employment gateway to the Borough, for the benefit of the Borough and wider sub-region.

APPENDIX

1. Strategic Drivers
2. Technical Suitability
3. Sustainability Appraisal
4. Peel Group





Strategic Drivers

Northern Powerhouse

The Government's creation of the Northern Powerhouse is providing a growth-orientated agenda for the north of England, of which the Liverpool City Region is a key component.

Specific focus is being placed on the opportunities for growth and jobs from the logistics and freight sector and increasing capacity in transport and port centric warehousing needs arising from SuperPort. A multi-modal freight strategy¹⁶ is planned to support trade and freight movement and build on national and international markets. Aligned to this, enhancing the performance of the strategic road network via enhanced capacity on the North-South and East-West motorway routes and effective links to the major ports including Liverpool is proposed.

Liverpool City Region Local Enterprise Partnership

The Liverpool City Region LEP is a private sector led Board with political leaders representing the six local authority areas of St Helens, Liverpool, Knowsley, Halton, Sefton and Wirral.

The work of the LEP in the Liverpool City Region includes harnessing central investment, including that secured via the 2012/14 Growth Deal, as well as securing major opportunities to create economic growth and jobs within the private sector through large scale projects.

The LEP's core activities include:

Strategic Economic Development:

contributing to the development of spatial planning, housing, transport, infrastructure, education and training policies.

Business Growth: assisting businesses to grow and increase productivity, promoting entrepreneurship and innovation, and advising businesses regarding funding and investment opportunities.

Key Growth Sectors Comprising:

- Knowledge Economy
- Low Carbon
- Visitor Economy
- SuperPort

Significant progress is being made on SuperPort and harnessing its potential for the region. The 2016 LEP brochure¹⁷ confirms the progress and follows the 2014 report 'Liverpool City Region SuperPort: Market Analysis Land and Property' which set out the opportunities that SuperPort presents for economic growth and job creation.

Combined Authority

The LEP is also part of the Liverpool City Region Combined Authority (CA); with the six local authorities it is taking forward the 2015 Devolution Agreement for the City Region with a likely programme for mayoral elections by 2017. The CA and Devolution Agreement commits to progress the opportunities of the Northern Powerhouse and growth across the region including an ambitious investment programme to unlock the economic potential of the River Mersey and SuperPort as well as maximise the opportunities from HS2. The devolved region would take on further powers and funding for economic development, transport, housing and planning to further the regional growth context including the identification of key economic sites.

SuperPort

SuperPort is the name given to the cluster of assets, capabilities and investment across the Liverpool City Region to develop a multimodal freight hub to rival such international locations as New York, Dubai and Singapore.

The growth of ports in the south and east of the UK has distorted historic patterns of trade, taking freight away from the North. The vision of SuperPort is to redress this loss of activity by bringing together and integrating the strengths of the ports, airports and freight community across the Liverpool City Region to create the most

effective and cost efficient environment for logistics in the UK.

The area of SuperPort includes the City Region's six local authorities - Halton, Knowsley, Liverpool, Sefton, St Helens, Wirral - plus the immediate natural hinterland of West Lancashire, Warrington and Cheshire.

The opportunities for SuperPort are global in scale and can transform the Liverpool City Region economy, creating 21,000 new jobs and £6.1bn in GVA by 2020 and nearly 30,000 and £18.3bn in GVA by 2030.

The key SuperPort projects and priorities include:

- L2 Post Panamax Terminal: developing a £300m in-river berth at the Port of Liverpool, increasing volume from 700,000 containers per annum in 2002 to 2 million by 2020. Implementation of the project has started.
- Port Centric Logistics Distribution: creating an outstanding stock of high quality distribution facilities and warehousing space for Port Centric Logistics operations at sites across the Liverpool City Region.

The 'Liverpool City Region SuperPort: Market Analysis Land and Property' Report¹⁸ identifies:

- over £1 billion investment in the Liverpool City Region in logistics infrastructure to significantly enhance the region's attractiveness for logistics operators;
- potential to create 30,000+ jobs in the next 20 years;
- requirement for 400 – 500 hectares of high quality available logistics sites to meet the anticipated significant increase in trade and associated services.

Haydock Point South is well placed to assist SuperPort in delivering the required sites and premises in the ideal formats and location.

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APPENDIX 2

The land is suitable for employment development, and is not subject to technical or environmental constraints that cannot be addressed through design and mitigation.

Technical Suitability

The land has been subject to assessment via a series of technical studies to confirm its suitability and deliverability for development. The key findings and any recommended mitigation is summarised below.

Location and Context

Relationship with Settlements/Urban Form
The 28 hectares of land is located in the south east quadrant of Junction 23 of the M6/A580 roundabout, between Haydock in the west, Ashton in Makersfield in the north and Golborne in the east (in Wigan borough).

It extends along the strategic road infrastructure to form an easterly extension to the urban area of Haydock.

It forms a connecting element between the wider Peel lands to the south west and north east of junction 23 infilling between the strong transport infrastructure in this area.

Proximity to Facilities
A Transport Appraisal by Vectros details the accessibility of the land on foot, by cycle and by public transport, and the location and accessibility of local facilities including shops, schools, health facilities and leisure facilities.

The 2km pedestrian catchment and 5km cycle catchment encompass large areas of the surrounding settlements of Haydock, Newton le Willows, and Ashton in Makersfield, including their local centres as well as schools and health and leisure facilities. Research has shown that many of these local schools and health facilities have current capacity to accommodate further pupils/patients.

The land is accessible to the existing employment area of Haydock Industrial Estate by foot/bicycle with pedestrian crossings to the A580 allowing ease of movement.



Strategically Connected

The land has excellent connections to the strategic road network in the borough of St Helens, with direct frontage to the A580 and immediate access to the M6 in both directions via Junction 23. This access allows onward connection to the regional motorway network of the M62/M38/M61 and to major centres and facilities in the North West and beyond (ie Port of Liverpool (SuperPort), airports and the major conurbations (Manchester/Liverpool Preston). Such connectivity is a key requirement for modern logistics operations.

Vehicular Access

Junction 23 has been recently improved as part of the national Pinch Point Programme to enhance the capacity and safe operation of the junction which was acknowledged to have a poor accident record and experience a level of congestion at times.

An assessment of traffic distribution associated with the development proposals, and detailed modelling of the operation of the motorway junction and its slip roads under various access options, has been undertaken in consultation with the Borough Highway Authority, the Highways Agency (now Highways England) and the agents JMP.

Initial technical work shows that access and junction solutions are available to deliver the scale of development proposed around M6 Junction 23 whilst also providing a material benefit to the operation of the junction itself.

Detailed design of the access proposals will be progressed by the development team. As such, the highway arrangement in this Prospectus is indicative and will be subject to further design evolution and discussion with the Highway Authority/ Highways England.

To serve the land, a new junction providing direct access, from the A580 to the east of Junction 23 is envisaged (which could also serve the land to the north). This would comprise a staggered traffic light junction which can be accommodated within the line of the existing highways areas and can provide for development levels envisaged on the land without impacting on the capacity and operation of the A580 or Junction 23. Options and analysis of the proposed junction arrangement has been undertaken in a Transport Appraisal and will be further developed in consultation with the Highway Authority/Highways England.

Access into the land would involve the movement of the Cowley dam to enable appropriate separation distance to the Heydock Park Farm residential care unit, this is anticipated to be acceptable in ecological and drainage terms and replacement pond provision can be provided within the masterplan. Landscaping buffers can also provide visual and acoustic screening of an access route to protect amenity of residents.

Connectivity by public transport

A number of frequent bus services operate in the vicinity of the site (via the A49 and A580) and revisions to service routes and timings could be taken forward at a planning application stage to increase accessibility further.

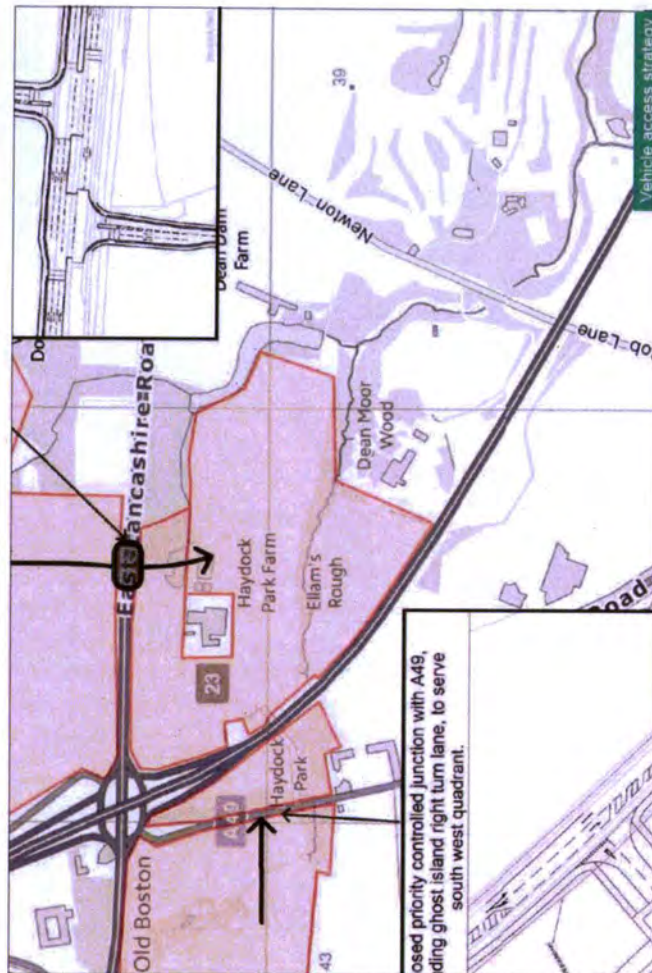
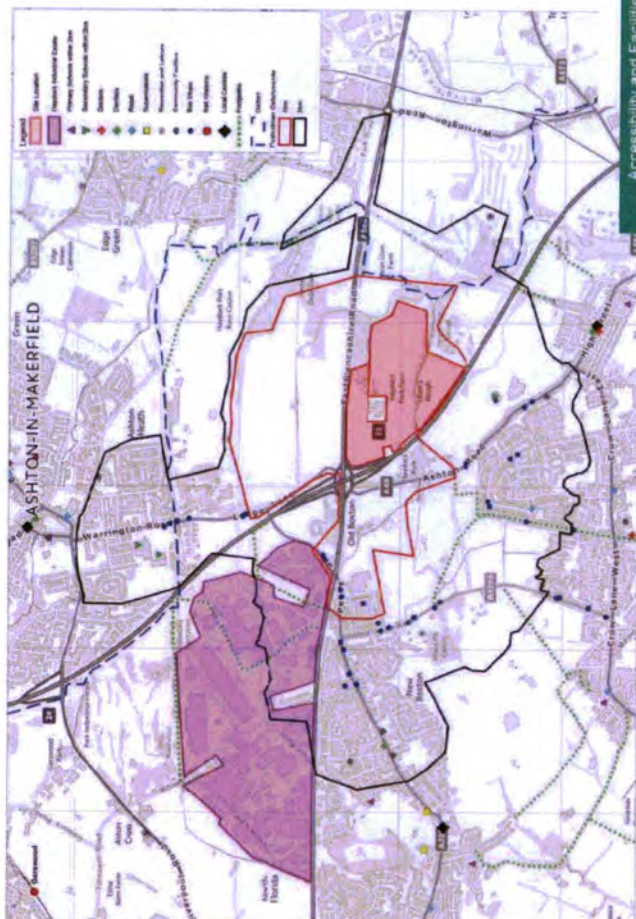
Newton le Willows railway station is located just beyond the 2km pedestrian and within the 5 kilometre cycle catchments and provides car and cycle parking facilities to travellers. The station is situated on the Liverpool-Stalybridge line and rail services provide access to Liverpool, Manchester and Chester.

From an accessibility and public transport perspective, the land is considered to be technically acceptable and suitable for development for logistics/employment. Enhanced public transport facilities, and the routing of bus services can be considered at planning application stage.

Pedestrian and Cycle Connectivity

Good standard and lit footpath and cycle routes are present in the vicinity of the land. An off road cycle route is present along the A580 with crossing points to the M6 junction. Footpaths along the wider road network also provide access to surrounding settlements and local services.

Improvements to pedestrian and cycle access via surrounding roads) can be taken forward in the masterplanning and detailed proposals for the land.



Environmental Considerations

Land Use/Green Network

The land is within single private ownership and in agricultural use; it is not subject to open public access.

A number of tree belts are present within and on the boundaries which provide a green network in ecological and landscape terms, but not in public access terms. These include historic plantation areas and woodlands.

The Lyme and Wood Pit Country Park to the west is a strategic recreation area in the Haydock/Newton-le-Willows area with footpath, cycle, fishing and heritage interpretation functions. To the immediate east of the land, a number of dams are used for fishing and recreation purposes.

Development of the land will enable an enhanced public access and green network to be provided within the land, and in wider development land, linking to existing settlements and surrounding green infrastructure.

Ecology and Trees

A Phase 1 Habitat survey and tree survey has been undertaken at the land by TEP to record habitat types, likely presence of protected species, tree quality and to identify any ecological/arboricultural constraints to development.

The findings show that the land comprises largely arable fields that are of low ecological value. Blocks of mature plantation woodland which include some veteran trees, streams, ponds and hedgerows are present on the land and around its boundaries and are of higher ecological value. Ponds, woodland and hedgerows are habitats of principal importance under the Natural Environment and Rural Communities Act (2006) and hedgerows are a priority habitat under the local Biodiversity Action Plan. There are no nationally/internationally designated wildlife sites within 2km of the land.

Two Local Wildlife Sites are located within/adjacent to the land and 15 LWS are within 1km. On-site LWS are:

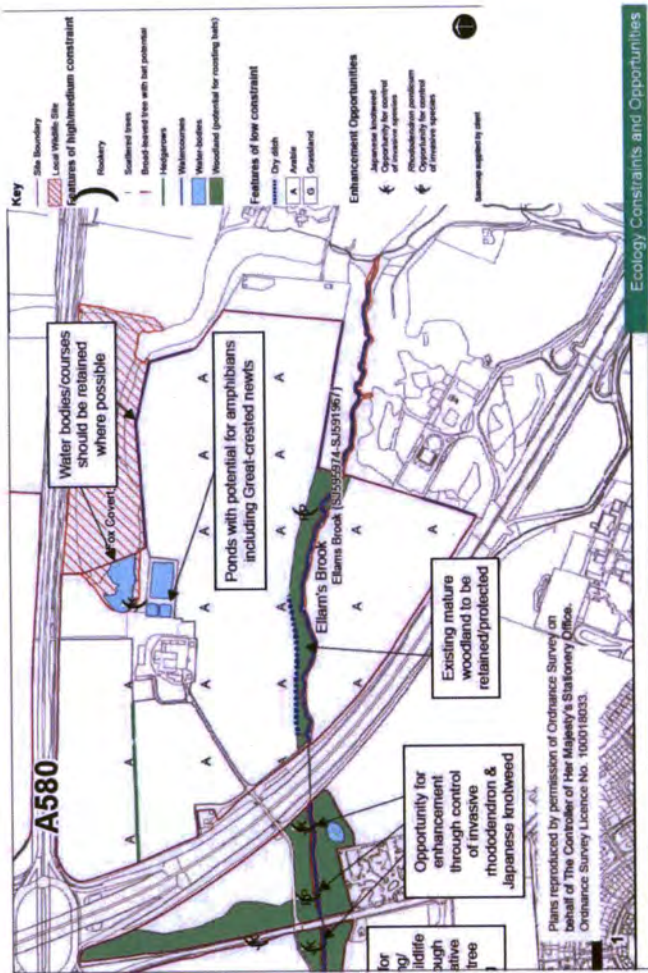
- Fox Covert including Cowhey Dam which includes a range of habitats including a pond, bluebells and locally rare bearded couch (*Elymus Caninus*).
 - Ellam's Brook along the southern boundary designated for water voles.
- The woodland to Ellam's Brook/ Ellam's Rough is also part of the Tree Preservation Order (TPO) Haydock Park (No5 1993).
- Such areas can be positively planned for in future development.

In the terms of fauna, the survey has identified amphibians and water voles in ponds/watercourses on the land and Great Crested Newts (GCN) have been recorded to the north west of the land. No signs of badger, otter or reptiles were found in the survey of the land and bat and bird species have been recorded within 1km of the land along with brown hares using the land for foraging (albeit arable land is not a priority habitat for hares).

Following initial surveys there appear to be no overriding ecological constraints to development at the land. Additional detailed surveys will be undertaken where necessary to inform final development options and any mitigation strategy.

Woodland/hedgerows and watercourses form habitat corridors through the land. There is scope to incorporate these within the masterplan and future development subject to infrastructure and access requirements. Notwithstanding this, the incorporation of additional planting as part of the overall future development will enable mitigation for any tree losses arising.

Additional planting associated with future development can also be fully considered at a future planning application stage to provide strengthened permanent Green Belt boundaries and ecological and green network enhancements.



Landscape and Visual

The land lies within the Green Belt and is being promoted for removal from the Green Belt and allocation; an alternative long term permanent boundary is considered to be possible having regard to Green Belt purposes. In landscape terms, the land is adjacent to the environmental improvement corridors of the M6/A580. The land is also within the Lancashire Coal Measures National Character Area which highlights the historical mining landscape and settlement form in the area, and the St Helens Landscape Character Area for Haydock Park.

The landscape assessment has confirmed the key characteristics of the area as being generally flat, predominantly open agricultural land with mature woodland blocks and plantations, and small dams/ponds. It is also concluded that the boundary context results in there being primarily short range and contained views across the land. The former park landscape is now highly fragmented and divided by the M6/A580 and influenced by the presence of Haydock Park Farm and water bodies/dams.

The road infrastructure of the A580 and M6 also represent key urban features in the landscape, particularly the elevated section of the M6.

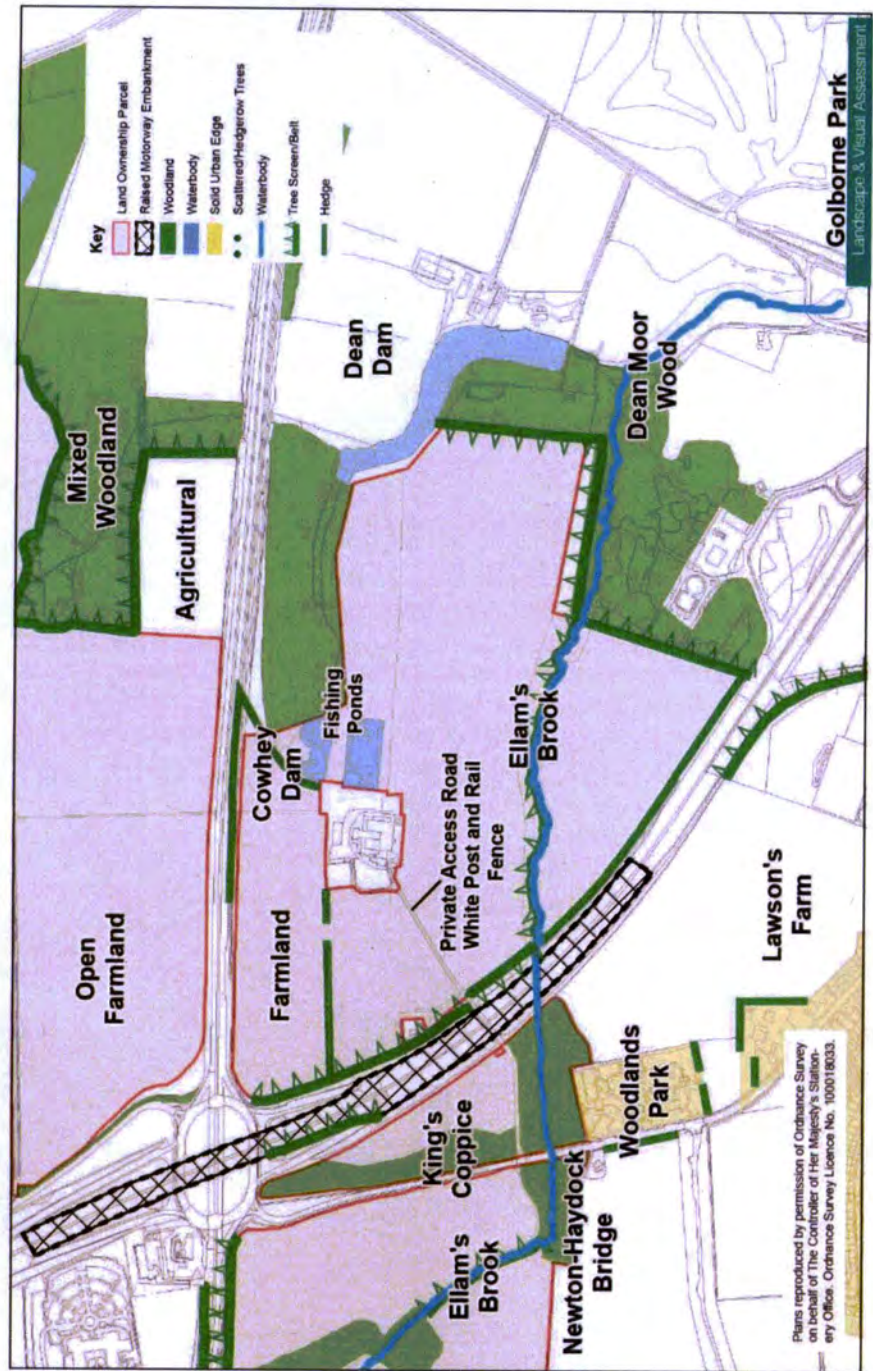
The area has a number of negative aspects including loss of boundary hedgerows and influence of the M6/A580 in physical, visual and acoustic terms.

Key receptors in the area comprise the residential care unit and Park Cottages. Users of the footpaths along the A580 are also receptors to any future development at the land.

The landscape character of the area has been concluded to be of moderate to strong character primarily due to field patterns and woodland planting with a medium sensitivity to change.

The published landscape assessments relevant to the land also highlight a range of opportunities for future development including to retain hedgerows, ponds and woodland and provide enhanced green infrastructure features with potential for public access/recreation and connectivity with the urban areas, new habitats and sustainable drainage systems. Such opportunities can be embraced by the development masterplan and provide a positive accordance with the assessments.

The landscape analysis has also concluded that the land has potential to accommodate large buildings which would be compatible with the scale of the landscape and the screening provided by the substantial tree belts. Further planting can soften views of future development from the A580/M6, and provide necessary screening and separation to the receptors of Haydock Park Farm and Park Cottages. Retaining and enhancing planting in this area can also reflect the historic parkland setting of the area.



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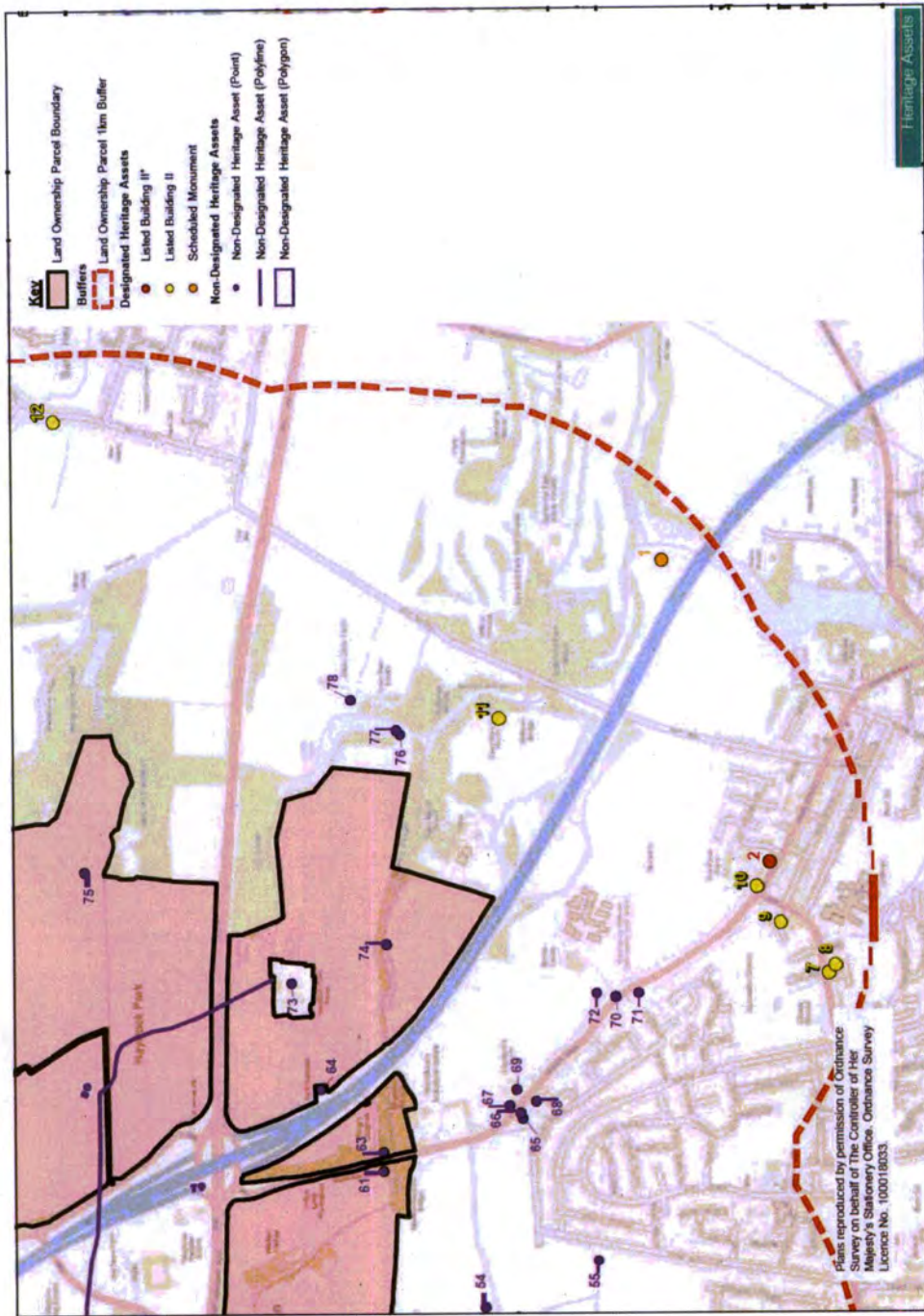
Heritage

Designated and non-designated assets within 1km of the land have been researched as well as potential for archaeological assets.

There are no designated assets within the land; 14 assets are within 1km of the land comprising the Castle Hill Scheduled Monument now within Haydock Park golf course, and 11 listed buildings (Grade 2*/Grade 2). Due to separation distances and intervening uses, the land does not affect the setting of these assets.

There is one non designated assets within the land (Drake Lane) and two on the immediate boundary (including Haydock Park Farm and Park Cottages). Further assets are within 100m of the land. There is also evidence of paths, plantation woodland and water management associated with the former Haydock parklands. Such assets and landscapes have been lost or heavily changed by recent road and built development such that only remnants of historic features remain.

There is considered to be high potential for presence of undiscovered archaeological assets from the post medieval/modern periods at the land and this can be considered via appropriate mitigation/recording at a future development stage. It is recommended that plantation woodland and historic field patterns to the former parkland is maintained; this can be considered in the masterplan, albeit most historic parkland is beyond the land boundary and not considered a constraint.



Noise

Noise monitoring has been undertaken in the area in February 2014 with the main noise source recorded being road traffic from the M6/A580, with effects reducing with distance from the roads and away from elevated sections of roads.

Key noise receptors in the vicinity of the site are the residential care unit and Park Cottages; these can be fully considered in any masterplan in relation to screening and orientation of buildings and road layout.

Logistics/employment uses are not unduly constrained by noise, and the future development layout could also improve the noise environment of the existing care unit by screening it from existing road traffic noise.

Air Quality

An Air Quality Management Area has been designated along the M6 (encompassing a 70m zone along the motorway in the vicinity of Junction 23) following concerns that concentrations of NO₂ in the vicinity of the M6 were exceeding annual mean AQ Objectives.

Further assessments undertaken for in the Council in 2011/13 found that the AQMA was still required and that reductions in NO₂ concentrations were unlikely to be met by 2015 without mitigation measures to reduce background levels or traffic emissions.

The key air quality considerations from development at the land will be from traffic and a full air quality assessment can be undertaken when the final development options are known. However given modern vehicle standards it is not envisaged that air quality will be a constraint to the development of the site.

Ground Conditions, Infrastructure and Services

Ground Conditions

A Phase 1 Desk Study and Preliminary Ground Conditions Risk Assessment has been undertaken. The land has been used for farming and, whilst within the zone of influence of former mining works, it is not considered that there are any ground conditions matters that will limit potential development at the land.

Pipelines

There are no pipelines crossing the land. The North West Ethylene Pipeline runs to the west side of the M6 and is a notifiable installation. Due regard will be had to Health and Safety Executive Guidelines for development in zones from the pipeline.

Energy

A number of electricity lines pass over and underground through the land and along adjacent roadways to serve the surrounding settlements, the residential care unit and Park Cottages immediately adjacent to the land. There is scope as part of future development options to retain or if necessary divert services to ensure necessary connections are maintained and to serve development at the land.

The utilities review has also highlighted that electrical capacity is available in the area, but that future development will need to consider this capacity level and a number of substations/transformers may be required to effectively supply units.

There are gas services in the adjacent roadways and it is not anticipated that there are any gas supply issues in the area.

Water

As undeveloped land, no water supply is available to the land, but a supply serves the residential care unit and cottages. The detailed scheme design stages will consider further supply requirements.

Flood Risk and Drainage

The land is located in Flood Zone 1 on the Environment Agency flood map and is not at risk of flooding.

There are a small number of culverts on the land, flowing into the land from the north. Ellam's Brook runs along the southern boundary of the land. The ponds and dams on and adjacent to the land are not considered to provide an attenuation function.

A SuDS drainage system can be provided to offer environmental and ecological enhancements. This will have regard to ensuring greenfield run-off rates and the drainage strategy will also seek to mimic the current north to south surface water flows arising from the land. Full regard will be had to EA, Building Regulation and SuDS guidance in the final scheme for the site.

A series of technical studies on the land have highlighted that there should not be any significant or insurmountable constraints to future development of the land for logistics/employment development. The studies have outlined that key issues can be addressed in the detailed review of the land and its fuller consideration at planning application stages in the future, particularly in respect of highways and access options. They have also outlined mitigation and further assessment areas to ensure that future development can proceed without technical objections. As a result, it is concluded that there are no technical reasons to prevent allocation of the land for future development.

APPENDIX 3



Sustainability Assessment: Haydock Point North

Sustainable development objective	St Helen's Local Plan SEA Framework Objectives	Assessment	Contribution
1. Economy - building a strong and competitive economy	To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth	The development of the site will deliver up to 775,000 sq ft logistics premises with the ability to deliver a large scale unit of c.500,000 sq ft and smaller units.	✓
		During the construction phase, the site development would generate £4.1m GVA Economic output uplift locally.	✓
		During the operational phase, the development would generate £39m GVA Economic output uplift locally.	✓
	To ensure local residents have access to employment opportunities	The construction phase of the site will create 627 jobs, 63 FTE jobs per annum and 23 indirect / induced FTE jobs locally. During the operational phase of the site, 555 net FTE jobs will be created in St Helens, while 831 net FTE jobs will be created in the LEP Functional Area. The land is accessible by a choice of means (as set out below) enabling residents/workers of St Helens Borough to have access to the site for employment opportunities.	✓ ✓ ✓
	To improve the education and skills levels of the population overall including increasing opportunities for training and employment opportunities	The development will deliver large scale logistics and employment premises in a key growth sector; this sector provides a range of employment opportunities - management/high tech/IT operatives as well as logistics/warehouse/transport staff (as recognised by recent studies (ie. BPF 2015). Jobs and training opportunities during construction.	✓

Sustainable development objective	St Helen's Local Plan SEA Framework Objectives	Assessment	Contribution
2. Transport - promoting sustainable transport	To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make best use of existing transport infrastructure	Nearest train station – Newton-le-Willows: Min 1.8km, Max 2.0km Nearest bus service – Lodge Lane: Min 1.3km, Max 1.5km The site is on the strategic road network with access to the regional motorway network (M62/ M58/ M61) and in proximity to major markets of the north west eg Port of Liverpool/ SuperPort facilities, airports and major conurbations (Manchester/ Liverpool/ Preston) to minimise trips and distances for development end users. The site is also accessible to local settlements and residential areas to allow ease of access for employees by foot, cycle and bus. The land can be accessed via the A580 via new signal priority controlled junction (along with Haydock Point North); this has been assessed in terms of operation of the road network and wider traffic generation from the development in consultation with the local highway Authority and Highway England to confirm capacity, safety and best use of existing road infrastructure.	✓
3. Homes – delivering a wide choice of high quality homes	To improve access to a range of good quality and affordable housing that meets the diverse needs of the borough	Whilst the development is not providing homes, it is located in proximity to Haydock Green that is being promoted as an urban extension to Haydock that will provide a range of housing opportunities. Potential employees will therefore be able to have access to and support the delivery of high quality housing.	N
4. Design - achieving good design	Good design and to reduce crime, disorder and fear of crime	Landscape and visual assessment has confirmed that the site and its boundary screening is capable of accommodating large scale buildings whilst retaining existing landscape features where possible. Unit siting, orientation and landscaping can also have full regard to the existing residential care unit and nearby properties. Regard can be had to design standards in masterplanning to achieve a high quality of design to create a sense of place and establish an attractive, safe area.	✓
	Green infrastructure	The development can create a range of new areas of green infrastructure and ponds within the site and enable public access to existing mature woodland and wetland areas within the site. This would also link to the wider Peel Haydock Parkland proposals for wider public greenspace and access potential in the east Haydock area.	✓
5. Health and community - promoting healthy communities	To improve health and reduce health inequalities. Ability to walk and cycle etc.	Hedgerows, ponds, and woodland will be retained, where possible, to provide enhanced green infrastructure features with potential for public access/recreation and connectivity within the urban areas. New habitats and sustainable drainage systems would also be created. This would enhance opportunities for recreation and enhance air quality to improve health opportunities.	✓

Sustainable development objective	St Helen's Local Plan SEA Framework Objectives	Assessment	Contribution
6. Green Belt - protecting Green Belt land		The need to accommodate employment development in the Borough is clear – which will necessitate Green Belt release as identified in the Local Plan Scoping and Evidence Reports. The land provides a strategic investment location at the key intersection of the M6 and A580, as an accessible and sustainable extension to the settlement of Haydock reflecting evidence base calls for logistics development in this location. Release of the land can retain the essential principles of the Green Belt of: - separation between settlements will be maintained and no merging of settlements will occur. - the land contains or is bisected by a number of major urban features including the significant road infrastructure and residential care unit which reduces the sense of openness of the land such that its contribution to this purpose of Green Belt is already weakened. - the land contains and is bounded by established and robust features, such as tree belts and water courses, which segregate the land and from the Wider Green Belt to the east and provide the means of defining a revised permanent Green Belt boundary. Where boundaries are marginally weaker, these can be readily reinforced through the delivery of a robust and comprehensive landscaping scheme to enhance definition and longevity. Taken to the boundaries proposed, the development proposition would serve to extend the Haydock urban area eastward but would retain substantial Green Belt separation between the extended urban area and the settlements of Newton-le-Willows, Ashton-in-Makerfield and Golborne, thereby limiting urban sprawl and preventing coalescence. The Haydock Point development area would provide a robust, long term defensible Green Belt boundary.	N
7. Climate change - meeting the challenge of climate change	To mitigate and adapt to the impacts of climate change	The land is located in Flood Zone 1 and, is not at risk of flooding. There are a number of culverts flowing into the land from the North, and Ellams Brook crosses the land (east to west). A number of ponds and dams are also in the north east corner of the land but are not considered to provide an attenuation function. A SuDS drainage system can be provided for environmental and ecological enhancements and to ensure the risk of surface flooding is not increased. The site proposals would also incorporate green infrastructure which would act as a natural source of cooling to mitigate against future temperature increases. The design of buildings could also incorporate climate resilient features such as shading and natural ventilation.	✓
	To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties	As above, a SuDS drainage system will have regard to ensuring greenfield run-off rates and the drainage strategy will also seek to mimic the current surface water flows arising from the land.	✓
	To minimise energy use and increase the proportion of energy both purchased and generated from renewable and sustainable sources	The detailed site design can consider energy requirements dependent on end user requirements.	✓
	To reduce the amount of waste, and to increase in order of priority, the proportion of waste reused, recycle and composted and recovered	The detailed site design can ensure appropriate consideration of waste strategies dependent on end user requirements.	✓

Sustainable development objective	St Helen's Local Plan SEA Framework Objectives	Assessment	Contribution
8. Natural environment – conserving and enhancing the natural environment	To protect and enhance biodiversity, ecology and geodiversity (habitats and minerals)	The findings of the Phase 1 Habitat survey and tree survey show that the land comprises largely arable fields that are of low ecological value; mature woodland, streams, ponds and hedgerows on the land are of higher ecological value (Ellams Rough woodland is also part of a wider TPO designation Haydock Park (No. 5 1993)). There are no nationally/internationally designated wildlife sites within 2km of the land. There are two Local Wildlife Sites within the site. Such areas can be positively planned for in future development. Following initial surveys there appear to be no overriding ecological constraints to development at the land and further more detailed surveys will be undertaken to inform final development options and any mitigation strategy.	✓
	To protect and improve land quality in St Helens	The findings of the Phase 1 Habitat survey and tree survey show that the land comprises largely arable fields that are of low ecological value. Areas of woodland/ponds of higher ecological value can be retained/mitigated in masterplanning/site development.	N
	To improve air quality in St Helens	The land comprises fields of limited merit. Further work will be undertaken to confirm land quality.	N
	To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside	The land is adjacent to environmental improvement corridors of the M6/A580 and landscape character areas, key characteristics of which have been largely lost by road infrastructure development and passage of time and do not constrain development. The landscape character of the area has been concluded to be of moderate to strong character primarily due to woodland planting with a medium sensitivity to change. The woodlands also limit views to short range. The landscape analysis has concluded that the land has potential to accommodate large buildings and that woodlands can be supplemented where necessary for landscape purposes and to provide screening to receptors such as Haydock Park Farm. Existing and new green infrastructure has potential for public access/ recreation and for connectivity with urban areas to enhance enjoyment of landscapes.	N
9. Historic environment – conserving and enhancing the historic environment	To protect, enhance and make accessible for enjoyment the cultural heritage and historic environment	The site does not lie within a conservation area and there are no national or locally listed buildings or designated assets within the immediate surrounding area. There is 1 non-designated heritage asset within the land (Drake Lane) and two on the immediate site boundary (Haydock Park Farm and Park Cottages). Features of the historic parkland landscape have been largely lost and the landscape has been heavily changed by recent road and built development such that only remnants of historic features remain. There is considered low potential for prehistoric/medieval assets at the land but high potential for the presence of undiscovered archaeological assets from the post medieval/modern periods at the land; this can be considered via appropriate mitigation / recording at a future development stage.	✓
	10. Mineral resources - facilitating the sustainable use of minerals	The site is not within a minerals safeguarding area.	✓

APPENDIX 4

The Peel Group

The Peel Group is one of the leading infrastructure, transport and real estate companies in the UK. It is more than 40 years since John Whitaker, the Chairman of Peel, established the foundations that form the Company as it is now, through a philosophy of recycling capital and long term investment, predominantly in the North West of England.

Peel's vision is to create sustainable environments where people and businesses can flourish. The Company has its roots firmly in the North West and has a very strong track record of property development and regeneration that includes the decades of sustained investment in Salford Quays culminating in the delivery of MediaCityUK.

Peel is supportive of the Northern Powerhouse and the opportunities that it can bring to the region in terms of growth, investment, jobs and environmental and social benefits. Peel have actively sought to engage with government and the regional stakeholders to take forward the growth agenda and have produced the report "Peel in the Powerhouse" to confirm their commitment to active delivery of development proposals and growth in the region.

As a strategic land holder across the North West, Peel takes a long term and connected view of the region, as set out in key regional investment programmes initiated by Peel including:

- Ocean Gateway
- Port of Liverpool and Manchester Ship Canal Master Plan
- Peel Logistics

Peel launched the Ocean Gateway Prospectus in 2008. The Prospectus sets out Peel's strategic priorities as 50 key projects to be delivered over the next 50 years through £50 billion of investment – including Haydock.

The Peel Ports "Mersey Ports Master Plan: A 20 year Strategy for Growth" (2011) sets out the investment strategy for the Port of Liverpool and Manchester Ship Canal. The Plan forecasts growth in tonnage at the Mersey Ports in excess of 70% by 2030. This growth is enabled by a series of land use plans for the key port assets, including the nationally significant investment of £300 million to create Liverpool2: the new deep water container terminal at the Port of Liverpool that supports the SuperPort proposals.

Alongside this direct investment in SuperPort, Peel supports and is working with local authorities to contribute to the delivery of a ready supply of land and premises of sufficient size quality and proximity to the SuperPort assets. Haydock is a site that can directly support this.

Peel has a long track record in delivering logistics development in different ways. Peel Logistics has recently been established as a joint venture between Peel Land and Property and Macquarie Capital and is currently delivering a portfolio of logistics developments including sites at Port Salford and Liverpool International Business Park to support the growth of the logistics sector and SuperPort. The potential logistics development at Haydock Point could be secured through different delivery models, including by Peel Logistics, by other development companies or by specific operator tenants.

Haydock Point South is one of the sites in the portfolio and can therefore be delivered in the short – medium term.



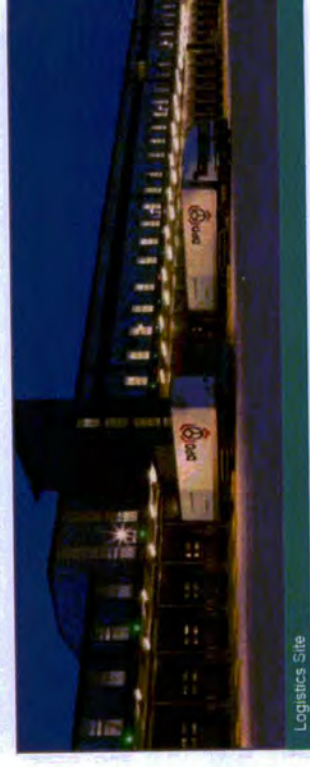
Liverpool2



Manchester Ship Canal



MediaCityUK



Logistics Site

REFERENCES

- ¹ A joint venture between St Helens Council and Network Space
- ² And associated Prospectus document for Haydock Point North
- ³ A multi-modal freight study is planned to report in March 2016
- ⁴ NAI Global on behalf of LEP
- ⁵ BPF – "Delivering the Goods – Industrial – the Economic Impact of the UK Logistics Sector"
- ⁶ Colliers (2015) – "From First Mile to Last Mile; Global Industrial and Logistics Trends"
- ⁷ Ibis World (2015) – "Warehouse and Storage in the UK"
- ⁸ Peel Report (2015) – "Peel in the Northern Powerhouse with Powerful Partnerships working together to deliver 150 projects in the North"
- ⁹ St Helens Borough Council
- ¹⁰ AECOM (2015) – "Employment Evidence Base Report"; BE Group (2015) – "Employment Land Needs Study"
- ¹¹ AECOM (2015) – "Employment Evidence Base Report"
- ¹² BE Group (2015) – "Employment Land Needs Study"
- ¹³ AECOM (2015) – "Employment Evidence Base Report"
- ¹⁴ National Planning Policy Framework (2012)
- ¹⁵ AECOM (2015) – "Employment Evidence Base Report"; BE Group (2015) – "Employment Land Needs Study"
- ¹⁶ HM Government (2015) – "Northern Transport Strategy Autumn Report – One Agenda. One Economy. One North".
- ¹⁷ SuperPort Liverpool - LEP website
- ¹⁸ NAI Global (2014) on behalf of the Liverpool LEP



Appendix 4: Haydock Green Site Prospectus



Haydock Green

Site Prospectus

FEBRUARY 2016

Prepared for



by



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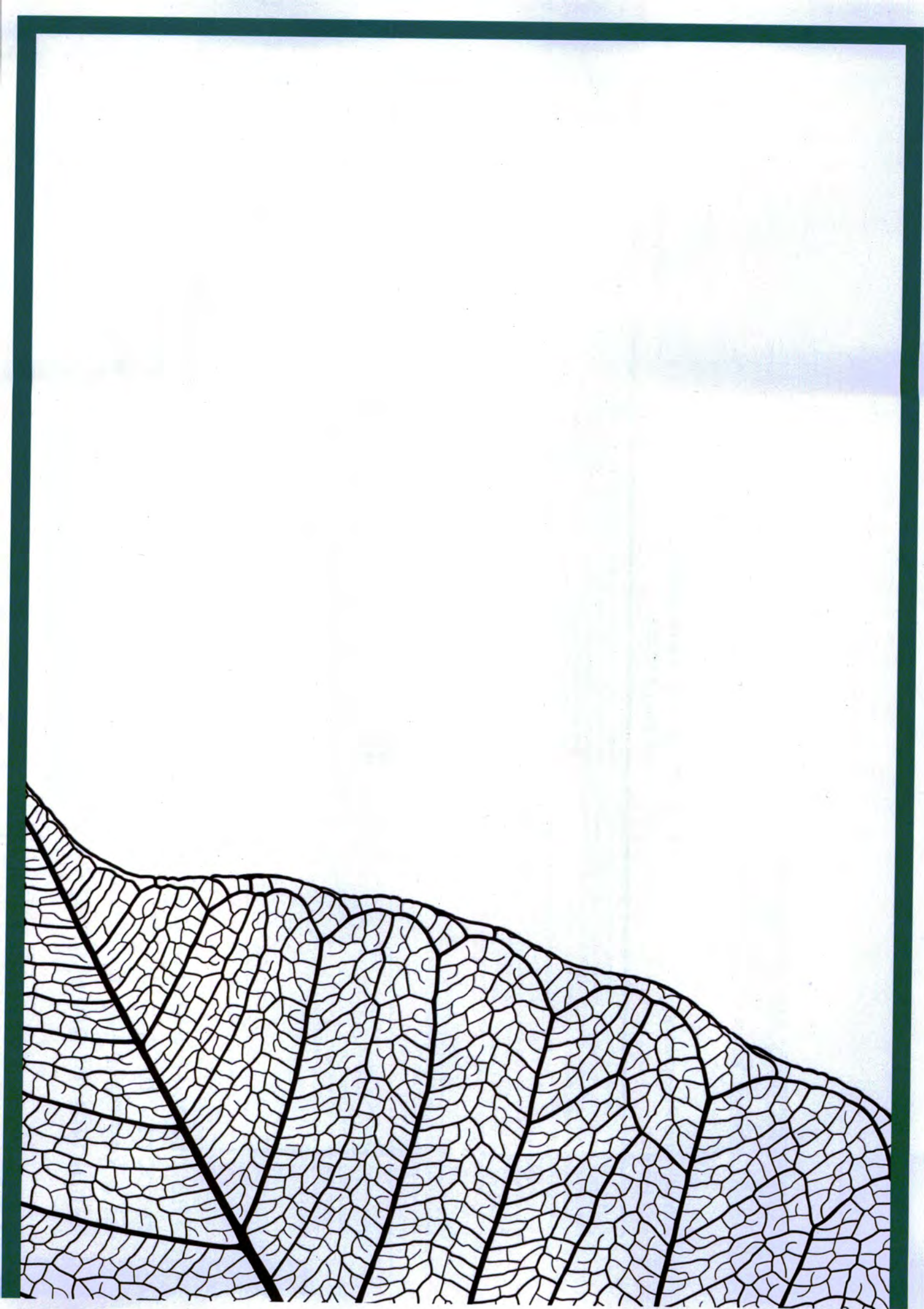
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01. INTRODUCTION

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- Haydock Green



1. INTRODUCTION

Growth and Prosperity - St Helens

St Helens Council is now progressing a new Local Plan. In doing so, the Council is grasping the need to plan positively to realise its growth objectives, including through necessary Green Belt review.

Peel Holdings (Land and Property) LTD (Peel) is committed to playing a structural role in the economic growth and improved prosperity of St Helens by bringing forward proposals to deliver high quality homes necessary to meet identified local housing needs and sustain economic growth. Employment proposals to respond to local needs and regional growth sectors in the North West are also proposed¹. The proposals for Haydock will form a sustainable urban extension at a strategic location in the Borough.

The ambition is to work with St Helens Council and its partners to create an Eastern Growth Area for St Helens, centred upon Haydock along with Parkside and the M6 corridor as a gateway to the Borough and the wider City Region.

Haydock is well placed to deliver homes in close proximity to employment opportunities and where recent housing provision has been relatively constrained.

It is clear from evidence gathered by the Council to date that the scale of growth needed is significant and cannot be met on land within the urban area alone. Planned urban extension is required in sustainable locations. Green Belt review will be required.

Eastern Growth Area - the proposition

In order to meet its growth needs, St Helens will need a range of sites. Haydock presents the opportunity for St Helens to deliver new homes and jobs set in an attractive parkland landscape² at the eastern gateway to the Borough in the short-medium term.

The Eastern Growth Area is ideally placed to accommodate logical extension to the settlement and existing residential and business neighbourhoods. It represents a highly sustainable way to deliver growth and help meet development needs through the delivery of:

Haydock Green: up to 750 homes as a sustainable extension to the established residential neighbourhood of Haydock to the west.

Haydock Point North and South: a logistics hub creating around 2.2 million sq.ft. of high quality logistics premises - well located on the M6 corridor, with good connections to employment drivers.

Haydock Parkland: a high quality green infrastructure of connecting native woodlands, tree groups, grasslands and watercourses linking new development with Haydock and the immediate landscape setting.

Haydock Gateway and Connections: a high quality gateway into St Helens and the Liverpool City Region for those arriving along the M6 and A580, with landscape improvements around Junction 23 and the M6 and A580 approaches.

Haydock Green

This Site Prospectus has been prepared on behalf of Peel. It promotes the allocation of 32.4ha of land at Haydock Green for residential development purposes in the emerging St Helens Local Plan.

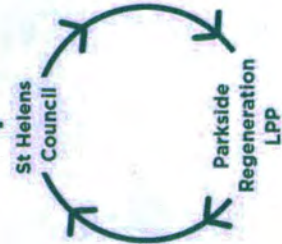
The proposals will allow St Helens to provide sustainable housing in response to local needs, in a strategically planned parkland setting at a key gateway to St Helens. The proposals strongly align with employment growth opportunities in the immediate vicinity.



Eastern Growth Area; Liverpool City Region Context

Eastern Growth Area

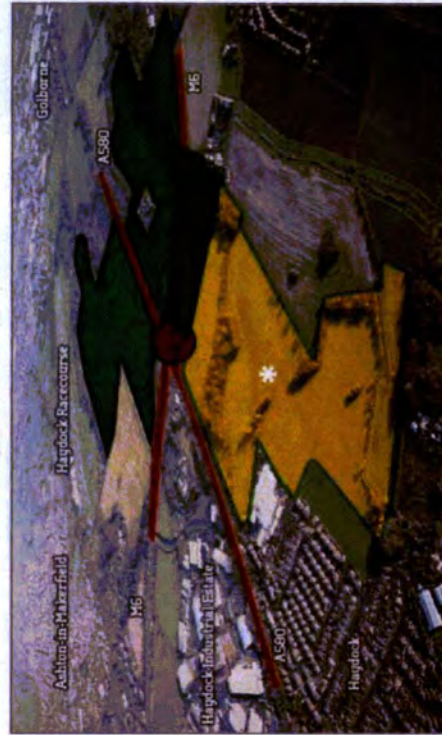
Parkside



Haydock



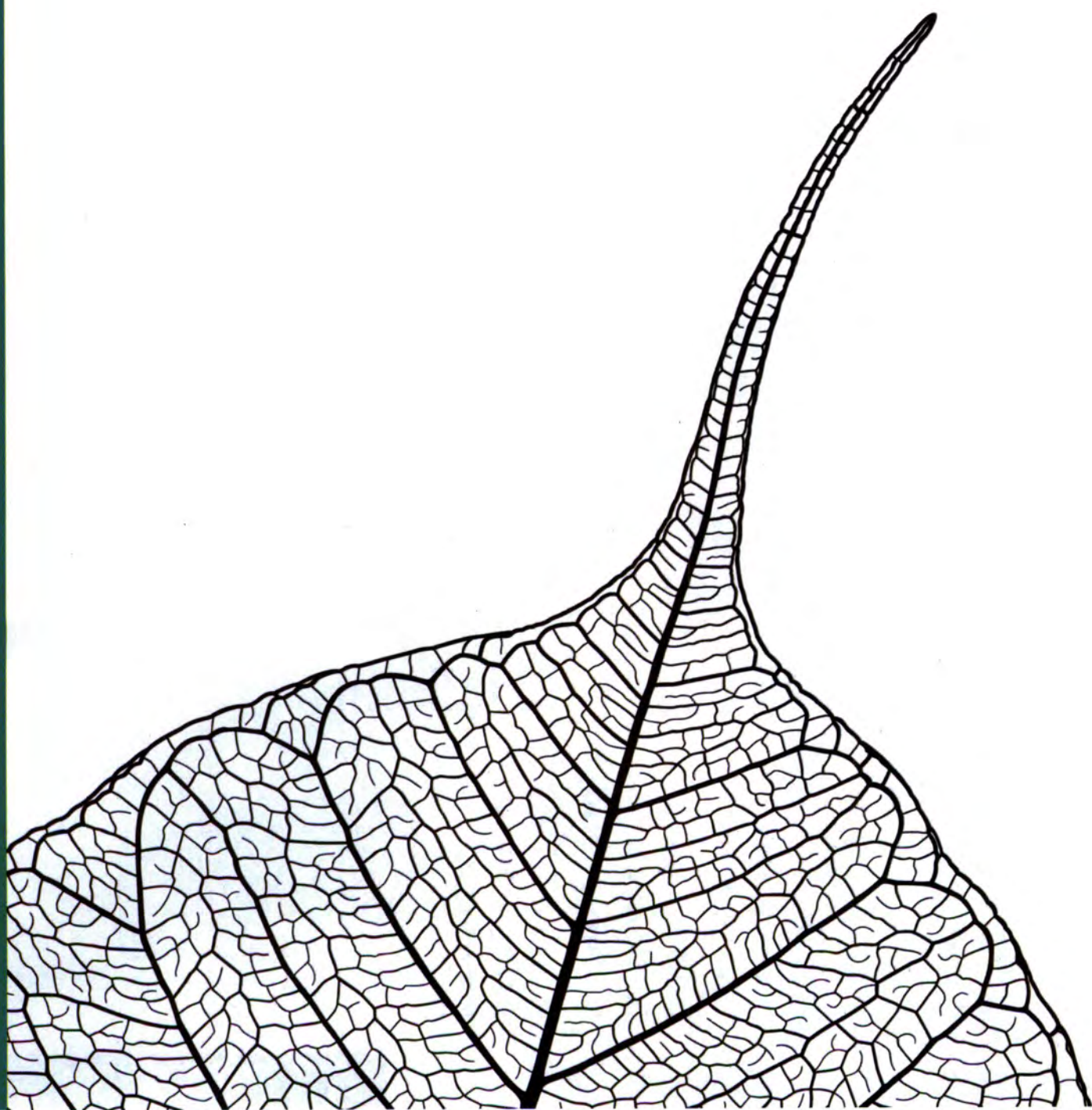
Haydock Green





02. STRATEGIC PRIORITIES

- St Helens Needs and Priorities
- Strategic Priorities
- Local Needs



2. STRATEGIC PRIORITIES/LOCAL NEEDS

The Haydock Green

proposals present an opportunity to deliver suitable land as a sustainable extension to Haydock.

St Helens Needs and Priorities

There are clear needs and priorities for housing development in St Helens in the next 15+ years. These reflect the:

- Government's aim to "boost significantly" the delivery of housing in the country for economic growth and increasing home ownership.
- Specific local needs arising from household formation, demographic change and market factors and the need to capture the economic growth potential of the Borough.

There is now a need to plan for growth in the Borough for the period to 2033 and beyond. The preparation of a new Local Plan will allow this growth requirement to be addressed and spatially expressed via land allocations.

It is clear from the housing growth agenda, previous scoping and evidence being gathered for the Council that changing circumstances in the Borough require a revised approach to the delivery of growth. Needs for development cannot be met on land in the urban area alone. Planned urban extension is required which should be directed to sustainable and accessible locations. A review of Green Belt is necessary to provide land to accommodate growth over the Plan period and beyond.

Strategic Priorities

There is a clear remit within Government and national policy to increase housebuilding reflecting the aim to build 1m homes in 5 years².

This requires the delivery of new housing across a range of tenures and to provide inclusive and mixed communities.

NPPF requires Local Authorities to plan for housing supply over the full plan period based on current and future demographic trends, market trends and the needs of different groups in the community. Where Green Belt review and release is required, further land should also be provided and safeguarded to enable Green Belt boundaries to endure.

Liverpool City Region, including St Helens, is a key element of the Government's Northern Powerhouse, which commits to the growth of northern cities to rebalance the UK economy and help the north to compete on the world stage.

Key priorities of the Powerhouse include economic growth and investment in jobs, skills and transport connections. As part of that growth, new housing is required to support the new jobs and growth and enable the existing population of the region to take advantage of the opportunities.

The Growth Deal for the Liverpool City Region will support the delivery of 10,000 homes in the region by 2021 whilst the emerging City Region devolution process will see the transfer of housing powers to the City Region to proactively plan for housing growth in the region.

As a major landowner, investor and developer, Peel supports the Powerhouse, its growth focus and the benefits that wider economic growth can bring to the region and its population. In its report 'Peel in the Northern Powerhouse', the opportunities for growth and prosperity, including via the development of Peel's significant landholdings is endorsed⁴.

Local needs

Recent national economic conditions and the slow down in housing delivery has seen housing completions in the Borough fall below annual requirements since 2007³. This has compounded issues of affordability and difficulty in accessing the housing market and out-migration has remained high.

The Council's "City Growth Strategy (2008-18)" and "St Helens Growth Plan 2015-18" aim to improve the range, quality and choice of housing provision across all tenures in the Borough with a focus on high quality aspirational and family housing and affordable housing and involving private developers in the delivery of the Borough housing needs. There are also aims to create better and greener places, via the provision and enhancement of accessible quality green spaces and parks.

The 2016 Strategic Housing Market Assessment (SHMA)⁵ produced as evidence to the Local Plan provides an assessment of need for housing in the Borough and considers various scenarios for growth and housing delivery between the three local authorities in the market area. This evidence is to be evaluated and tested.

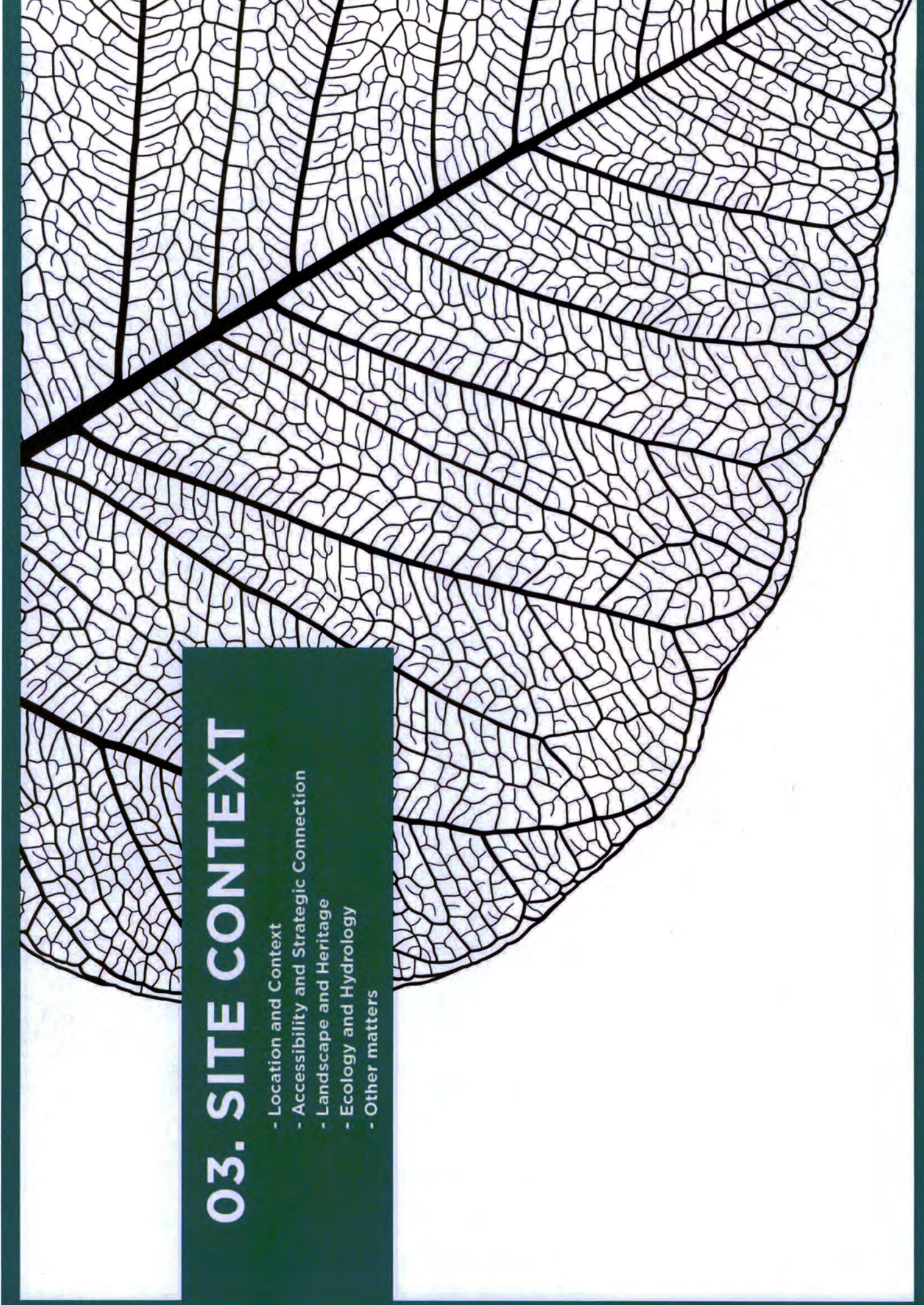
The adopted Core Strategy acknowledged the constrained supply of housing land in the urban area and proposed Green Belt release for housing land for the period from 2022. The Local Plan will reconsider the housing requirement for the period to 2033 but the constrained nature of the urban area and the extent of housing need will necessitate significant Green Belt release.

Priorities

In response to these drivers, key priorities for the emerging Local Plan should therefore include:

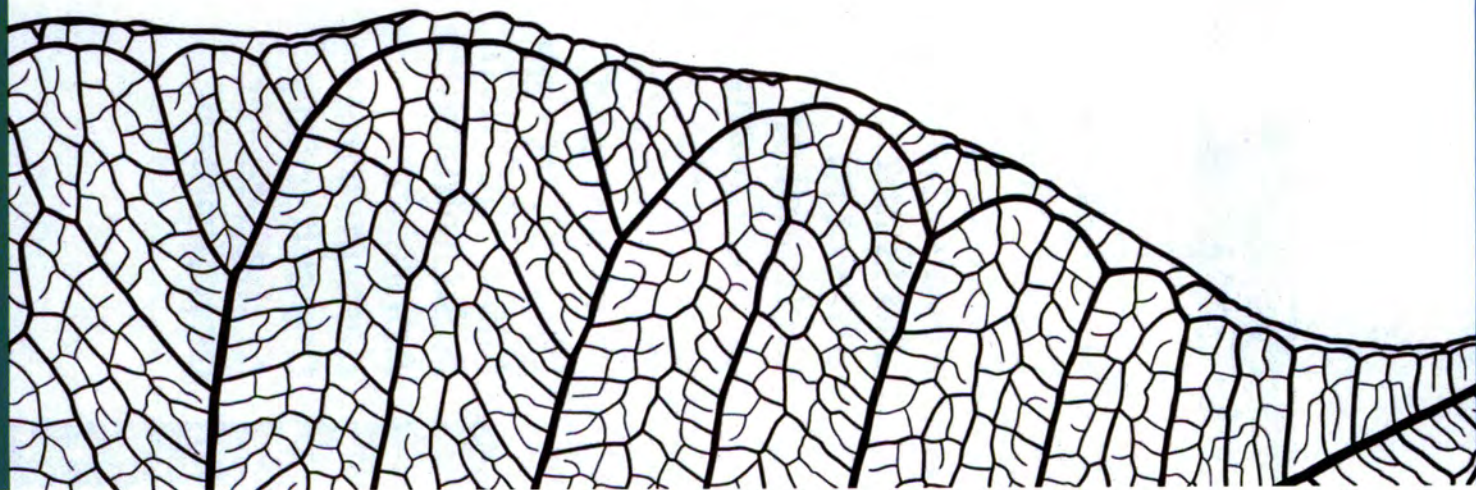
- Accepting that housing numbers must reflect the economic growth potential in the Borough and housing market area;
- Providing mixed and inclusive communities that are accessible to local employment and community functions to provide sustainable forms of development;
- Providing healthy communities who benefit from accessible green spaces;
- Achieving sustainable urban extension to address the reducing numbers of suitable urban and brownfield sites including via a review of the Green Belt, accepting Green Belt release is required to accommodate needs.





03. SITE CONTEXT

- Location and Context
- Accessibility and Strategic Connection
- Landscape and Heritage
- Ecology and Hydrology
- Other matters



3. SITE CONTEXT

Haydock Green is suitable for housing development and is not subject to technical or environmental constraints that cannot be addressed through design and mitigation. A Sustainability Appraisal demonstrates the suitability of the site for development.

Location and Context

The 32.4ha of land is located to the south west of Junction 23 of the M6/A580 roundabout adjoining Haydock to the west. It sits between the road infrastructure of the A580/A49 (Lodge Lane) and B5209 (Vista Road) to form a south easterly extension to the urban area of Haydock.

Haydock is a main settlement in the Borough with a range of facilities and services. It also accommodates one of the main employment areas of the Borough, Haydock Industrial estate. Its location on the strategic highway network results in a high level of accessibility by road and bus. As an established and accessible residential area it has potential to accommodate additional housing and employment development, including via planned urban extensions. The land forms a suitable area for expansion of the settlement for residential purposes that will support the employment proposals on land to the east.

It comprises agricultural/grazing land that is interspersed/ bounded with woodland and hedgerows. Ellams Brook crosses the site within the main woodland block whilst a smaller brook is present in the west of the land. A public footpath also links through the site. To the west, Lyme and Wood Pitts Country Park provides a main open space and recreation function to the Haydock area whilst a playing field lies on the north west boundary. Immediately east of the land is a woodland area (also in Peel ownership) beyond which is the M6.

The land lies in the Green Belt that separates the settlements of St Helens and Wigan Boroughs. There is clear physical separation between the site and settlements to the east (Ashton in Makerfield), and to the south (Newton le Willows).

Accessibility and Strategic Connection

The site has excellent connection to the local highway network and can be accessed from both Lodge Lane and Vista Road for car, cycle, pedestrian and public transport access. East-west connection can also be provided through the site between these roads in the masterplanning of the land. The site is highly accessible by bus with services along Vista Road and Lodge Lane/ A580. An on-road cycle

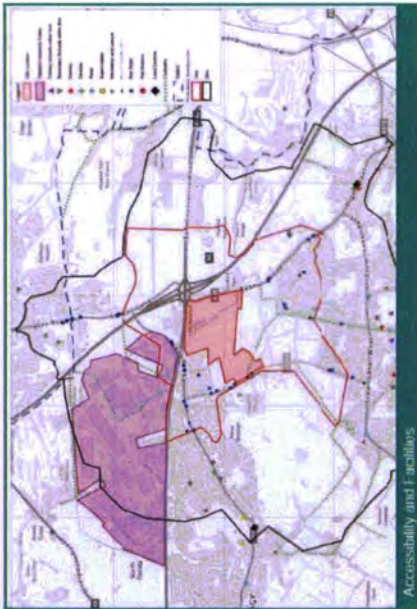
way along Vista Road is supplemented by an off road cycle way along the A580. Newton le Willows railway station is within 2km of the site. This local access regime allows access to the services, facilities and employment areas of Haydock and Newton le Willows and other nearby towns by a range of means.

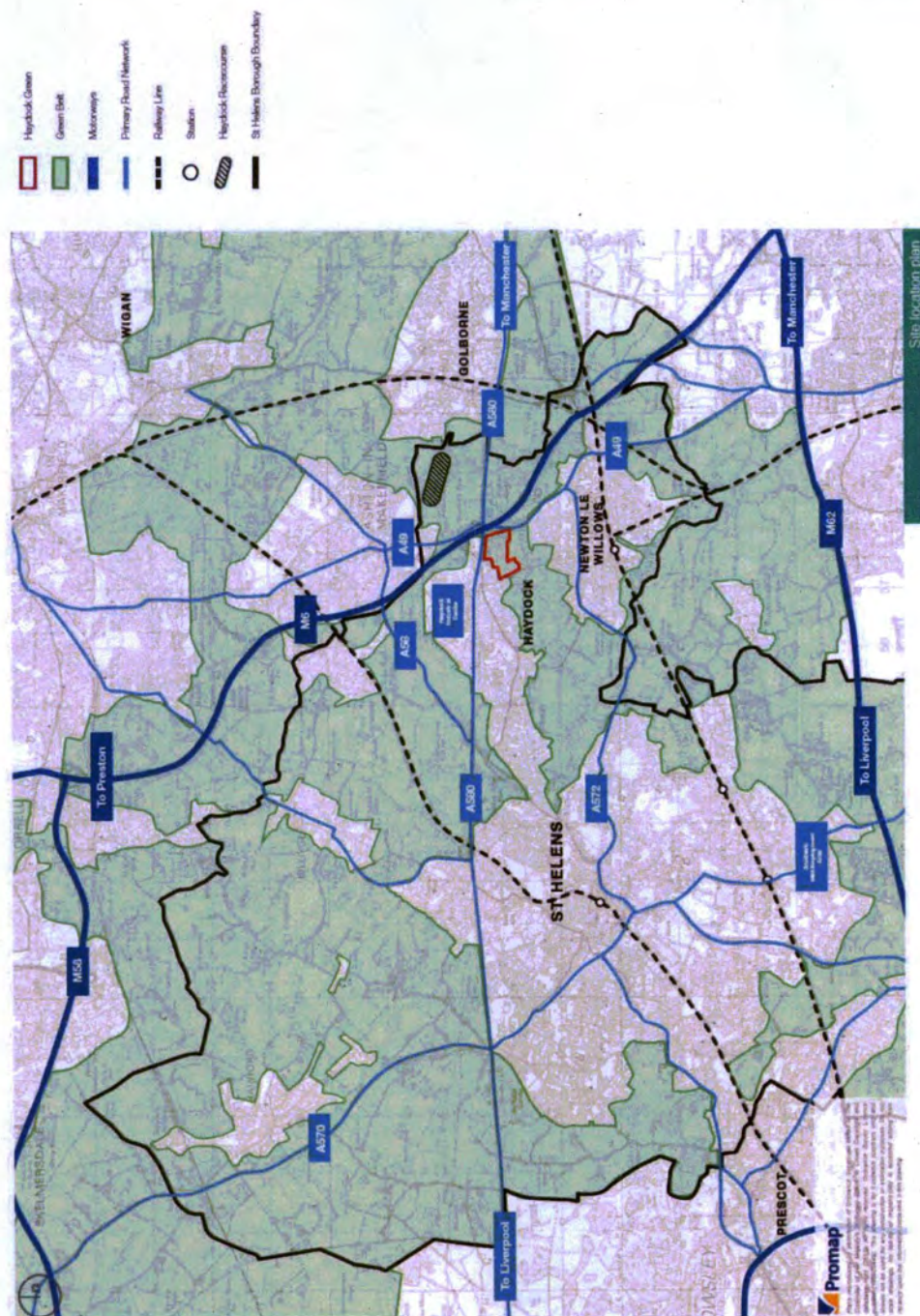
The site is also highly accessible to the strategic road network via the A49 to the A580 and Junction 23 of the M6 to provide links to major centres and towns of St Helens, Wigan and Warrington, and to wider conurbations of Manchester, Liverpool and Preston for employment and services

Landscape

The visual context of the land is of open farmland interspersed with hedgerows and tree belts. The northern parts of the land are influenced by the surrounding settlement edge and road infrastructure whilst the southern parts of the land are more open in character but contained by the woodland belts present along the southern boundary. As a result, views at the site are short range and set within the landscaped context; the historic field pattern has been reduced and influenced by surrounding development. There are no heritage constraints to development of the land.

Additional landscaping can be provided along the southern boundary of the land to provide further definition to the land edge (where necessary) whilst also enabling greenspace linkages to be provided for visual and public access linkages to the wider open land to the south, Peel lands to the east and Lyme and Wood Pitts Park to the west. This is being further considered by Peel in a Parklands proposal to provide a strategic approach to open space and green networks to the south/east of Haydock.





Ecology and Hydrology

A number of woodlands and streams/ponds are present on the site, the main woodland area in the centre of the land being a Local Wildlife Site, part of a Tree Preservation Order and area of high quality trees. Other groups of trees on the land are considered to be of medium-high quality with some veteran trees including potential for roosting bats and birds. Potential for water voles and amphibians has been demonstrated albeit initial site surveys have not identified any species of protection on the land. Further surveys will be undertaken at site development stage as necessary. The site provides a landscape structure which can be utilised and enhanced through the site masterplanning.

The land is not constrained by any flood risk.

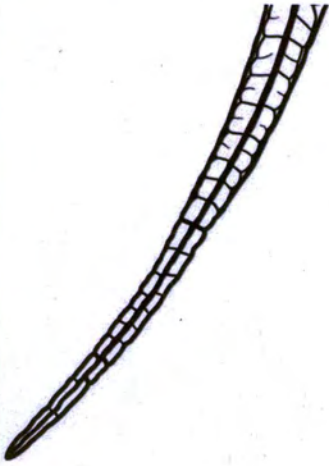
Other Matters

The North West Ethylene Pipeline runs to the west of Lodge Lane and is a notifiable installation. Easements and zones of control extend onto the land but can be fully taken into account in the site masterplanning terms of development areas for access, open space and development. A second pipeline on the land is understood to be non-operational and again regard can be had to easements.

The land has also been subject to previous mining activity and records of mine shafts and made ground/ potential underground workings are present for the land. Full review will be undertaken of mining and ground conditions at site development stage as necessary, however it is clearly relevant that large areas of St Helens Borough and nearby Boroughs have successfully delivered housing on former mined areas.

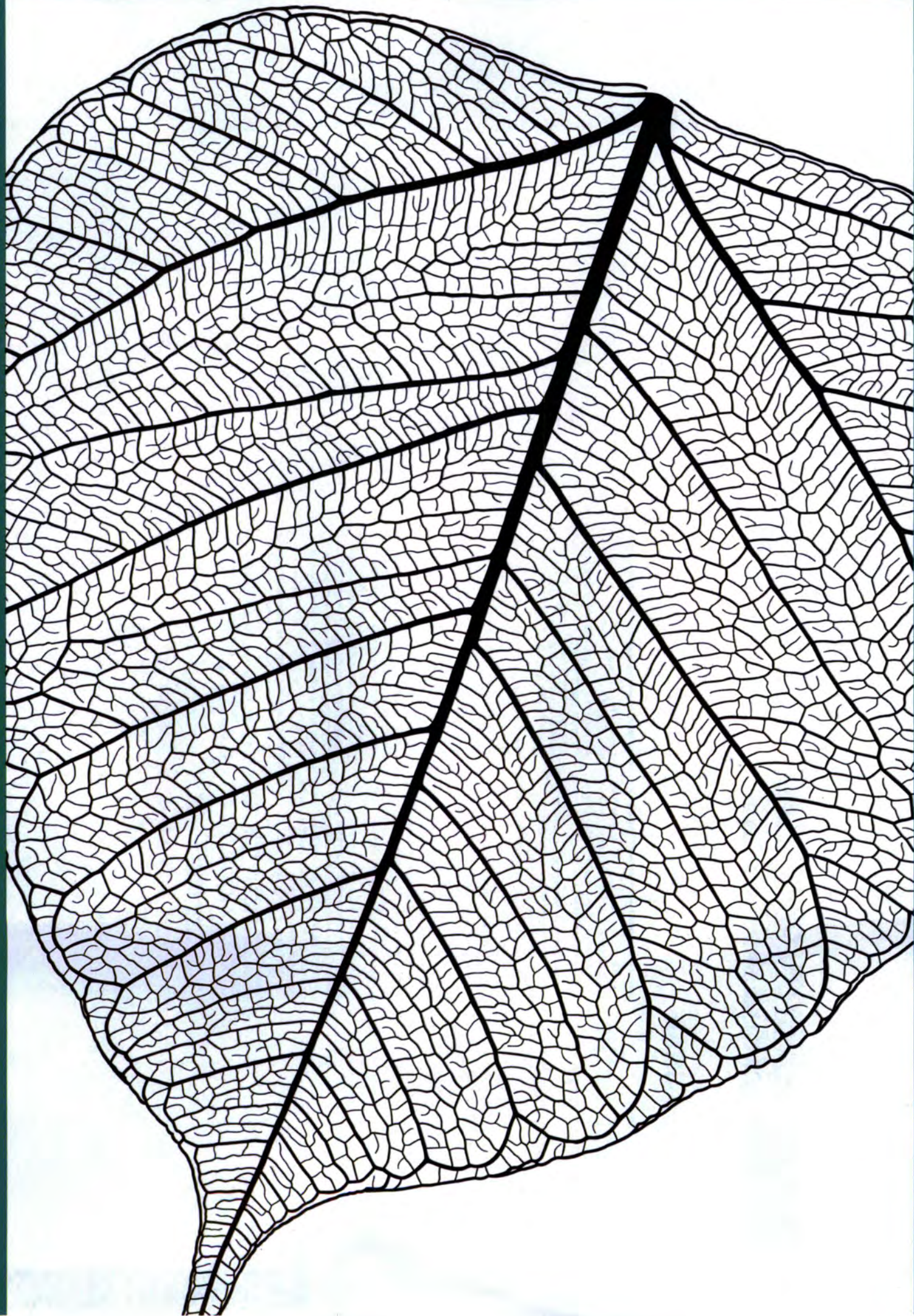
Given the scale of the site and the design, technical and construction solutions that can be progressed, there are no technical matters that constrain the land from development.

Technical Assessment of the land is provided in Appendix 1 and a Sustainability Appraisal in Appendix 2 which draw upon a series of technical studies of the land. These highlight that the site forms a sustainable location for development and there would be no significant or insurmountable constraints to future development of the land for housing. It is concluded that there are no technical reasons to prevent allocation of the land for future development.



04. PLANNING POSITION

- National Context - Achieving Sustainable Development
- Sub Regional Context - Economic Drivers
- Local Context - Accommodating Needs
- Green Belt Review to Accommodate Growth Needs



4. PLANNING POSITION

The proposition is a direct response to the requirement for sustainable solutions to accommodating housing needs.

Haydock Green is a solution to meeting identified needs for housing as a logical and sustainable urban expansion of existing communities close to employment opportunities.

The need for Green Belt release is recognised – Haydock Green offers an opportunity to accommodate needs in a strategically planned manner whilst retaining an effective Green Belt that serves its purposes.

National context –sustainable

development and Green Belt Review
National Policy⁷ outlines a presumption in favour of sustainable development via positive growth and social, economic and environmental progress. Local planning authorities should positively seek opportunities to meet the development needs of their area and positively drive wider opportunities for growth. Market signals and the suitability of land to meet needs are critical considerations.

The Green Belt remains of great importance, in preventing urban sprawl and by keeping land permanently open, however exceptional circumstances can necessitate and justify Green Belt release. Meeting development needs and the absence of reasonable and sustainable alternatives can represent such exceptional circumstances.

Green Belt release should also avoid the need for further boundary review in the next Plan period via 'safeguarding land' to meet longer term needs and foster clearly defined, permanent boundaries.

Peel believes the proposals for Haydock Green would achieve these objectives.

Drivers for Change Housing Growth

As referenced in Section 2, there are clear social and economic growth priorities of the Government to increase housing delivery and opportunities for meeting housing needs across the full range of housing types and sizes.

Local context – accommodating needs

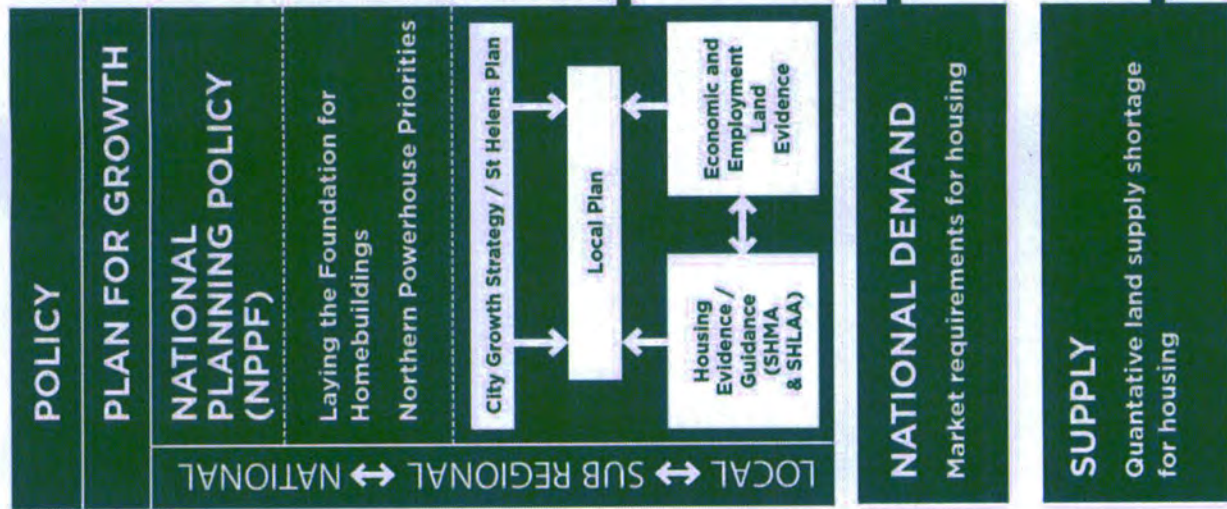
The current Core Strategy recognises Green Belt release is required to provide sufficient land for housing in the Borough post 2022. This is now also acknowledged in the Council Scoping for the emerging Local Plan, taking forward a Green Belt review that was commenced in 2013.

Evidence undertaken for the Council to inform the Local Plan (GL Hearn⁸) assesses the Borough need for new housing in the period to 2033 in the context of the Mid Mersey Housing market area. Various housing growth scenarios are considered with 451 dwellings per annum identified as the OAN. It is however necessary to integrate employment growth needs and potential from growth sectors to future housing requirements, a crucial area which the housing requirement will need to reflect.

Peel consider the OAN to be understated and that the requirement will be considerably higher.

A City Region wide housing market assessment is to be undertaken; the outcomes of which will have to be fully assessed.

Concept Drivers



HAYDOCK STRATEGIC ADVANTAGES

Haydock is located on the intersection of the M6 J23 and A580, therefore having a strategically and locally accessible and attractive location

Haydock is capable of accomodating a sustainable extension to the existing Haydock community

Haydock can be strategically planned and delivered as a high quality investment by Peel in partnership with the Council and local community

PLANNING REQUIREMENTS

Shortage of long term urban land supply

Need and demand for housing

Green Belt Review to facilitate economic growth / housing

Allocation of sites to enable delivery

Green Belt Review to Accommodate Growth Needs

There are exceptional circumstances requiring a review of the Green Belt in St Helens to enable development needs to be accommodated.

The need to accommodate housing numbers by Green Belt release is accepted by the Council. Even to meet the OAN arising from the SHMA Green Belt release is necessary.

The amount of land needs to be fully quantified, and supplemented by sufficient safeguarded land to enable Green Belt boundaries to endure beyond the end of the Plan period in line with national policy.

A revised Green Belt around Haydock Green can be permanent, long term and defensible and maintain clear separation between settlements.

Release of the land and the alternative Green Belt boundary that can be defined in this location is an appropriate response as:

- the site provides a sustainable and suitable means of accommodating housing need in a settlement with a significant employment base and further opportunity for expansion to create a sustainable extension to Haydock;
- separation between settlements will be maintained and no merging of settlements will occur – wider greenspace use and networks can be considered to the south of the land linking between existing and future greenspaces to the west (Lyne and Wood Pits country park) and wider Peel lands to the east, to provide a definitive and permanent open green gap to the south of Haydock/ north of Newton le Willows
- a revised permanent Green Belt boundary can be created by using existing and reinforced features to enhance definition and longevity.

Assessment against national Green Belt purposes and previous local Green Belt review methodology

Green Belt Purpose	Assessment against Green Belt Purpose
Preventing Sprawl	Read in the context of existing settlement edge and infrastructure to most site boundaries. Defined by strong urban boundaries to north, east and west and landscaping to the south that could be supplemented to provide a stronger permanent boundary.
Merging of Settlements	Part of a gap between settlements at the south and a wide gap to the east. Development to the south would maintain a physical and visual separation between settlements which could endure by the clear southern definition of the site. This could be supplemented by the potential creation of a parkland structure on the land to the south linking between open land to the west and east.
Encroachment	Existing development around the land (roads) provide a level of encroachment into the existing Green Belt area. The roads provide strong defensible boundaries to prevent physical encroachment into the wider Green Belt area whilst existing and future landscaping to boundaries will prevent further extension and encroachment of development southwards.
Overall Evaluation	Medium- strong boundaries to contain development and a degree of existing inappropriate development in the area. Revised Green Belt boundary as proposed can form a logical, permanent boundary. An appropriate Green Belt area can be maintained following release of this land.

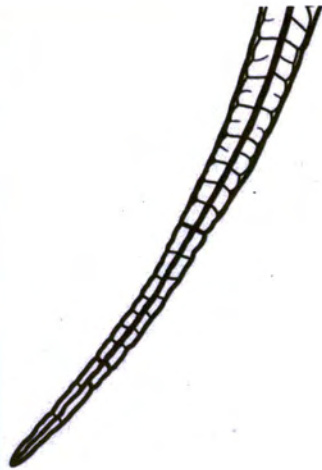
The proposition would extend the Haydock urban area eastward but would retain Green Belt separation between the extended urban area and the settlements of Newton-le-Willows, Ashton-in-Makerfield and Golborne, thereby limiting urban sprawl and preventing coalescence.

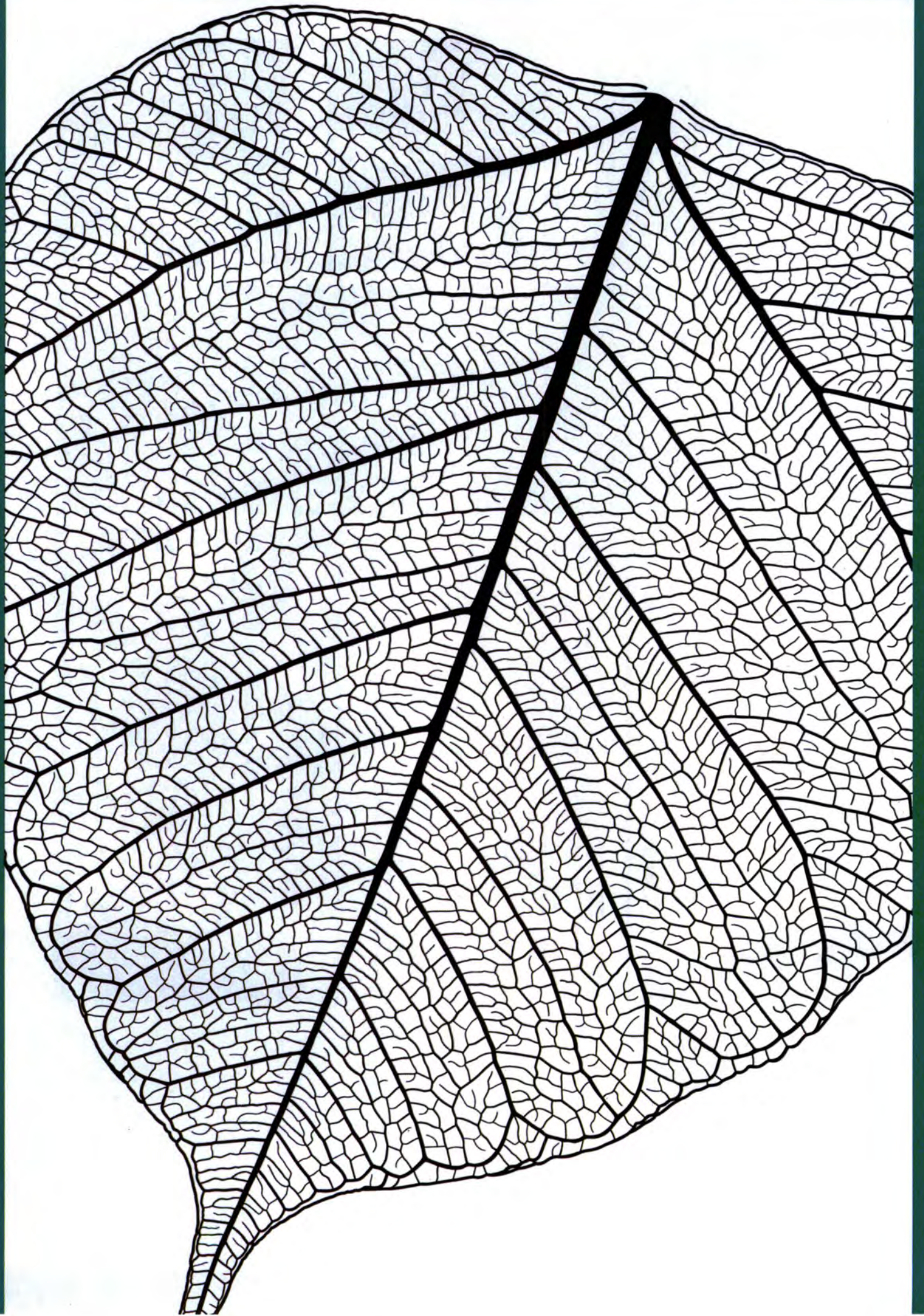
Peel also understands that land to the north of Newton le Willows/ south of the haul road that serves the landfill site to the west (connecting between Vista Road and Lodge Lane), is being promoted for housing by others. In the event that development goes ahead, as part of the Haydock Parkland proposals, land to the south of Haydock Green/ north of the haul road would present the opportunity to secure a 'green gap' between the two communities to prevent the coalescence of Haydock and Newton le Willows. It would also offer opportunity for greenspace infrastructure linking between the existing country park to the west and wider Peel land to the east.

The Haydock Green development area and proposals will provide a robust, long term defensible Green Belt boundary that will minimise the impact on the strategic purposes of Green Belt and cater for development needs over the plan period.

Haydock Green is strongly aligned with wider proposals around Junction 23 which represent a cohesive development solution to meet identified needs. The proposals alongside Haydock Point North and South and Haydock Parklands justify and derive maximum benefit from a realigned Green Belt boundary in this location.

05. PROPOSALS AND FRAMEWORK





Haydock Green

The proposal is to deliver a sustainable urban extension to Haydock. Haydock Green can provide for around 750 new homes within a new Parkland setting.

The location is well placed to form a natural extension to the existing residential neighbourhoods of Haydock. There is a choice of good street connections linking Haydock Green to the existing local shops and community services in Haydock to the west. Vista Road is the principal street connection and is also a key route for local bus services. There is also a choice of street and footpath connections linking Haydock Green to Haydock Industrial Estate to the north.

The pathways proposed through Haydock Green provide pedestrian and cycle path links to the east - connecting new residents with new jobs at Haydock Point North and Haydock Point South.

The site is shaped by the organic field pattern of linked tree groups, hedgerows, ditches and watercourses. The principal tree groups follow the course of Ellam's Brook and the field boundaries.

The tree groups and Brook create a landscape structure of three enclosures which have shaped the residential layout to create three distinct character areas set within an interlocking Parkland structure.

This Parkland is well placed to link with and complement the newly formed Lyme and Wood Pits Country Park to the immediate south west.

Key principles are to:

- 1** Deliver three distinct housing parcels forming a sustainable urban extension of around 750 new homes including larger aspirational family housing and affordable housing to meet local needs.
- 2** Create a clear, easily understood hierarchy of high quality streets and greenspaces providing a choice of housing sizes, types and tenures.
- 3** Create a principal Main Avenue as a structuring east-west connection across the site providing the opportunity to bring bus services through the development.
- 4** Create a new Village Green as the community focal point for residents.
- 5** Create a well defined, interconnected landscape structure along the southern edge to form a robust, defensible Green Belt edge.
- 6** Create a high quality, attractive landscape frontage along the northern and eastern edges to provide an environmental buffer to the A580 and M6.
- 7** Create a strong, well defined street and building frontages onto the existing greenspace to integrate new homes with Haydock.
- 8** Retain and strengthen Ellam's Brook as the principal watercourse and principal north south landscape and ecology corridor within the wider site landscape and drainage strategy.
- 9** Create a second north south landscape corridor including a principal community Green as the focal point for natural play and recreation.
- 10** Create two green streets linking the existing greenspace and playground to the new Parkland landscape structure.
- 11** Provide a choice of pedestrian and cycleway pathways linking to Haydock to the north and west and to Haydock Point to the east.
- 12** Align key streets and greenspaces with fixed strategic pipeline easements.
- 13** Create good pedestrian/cycleway and landscape links to the Lyme and Wood Pits Country Park to the immediate south west.



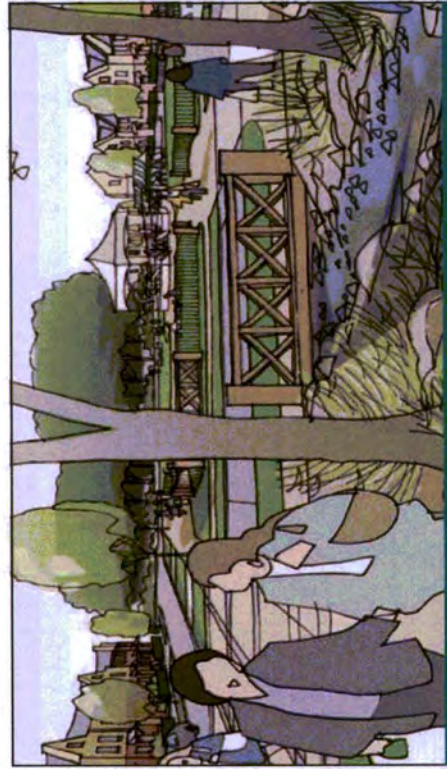
Precedent Images



Precedent Images



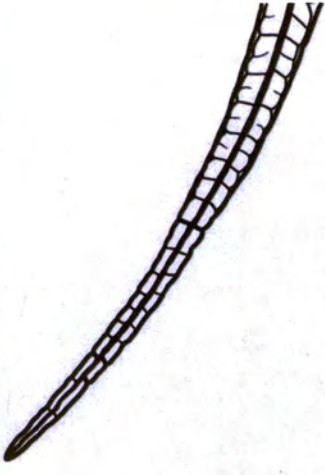
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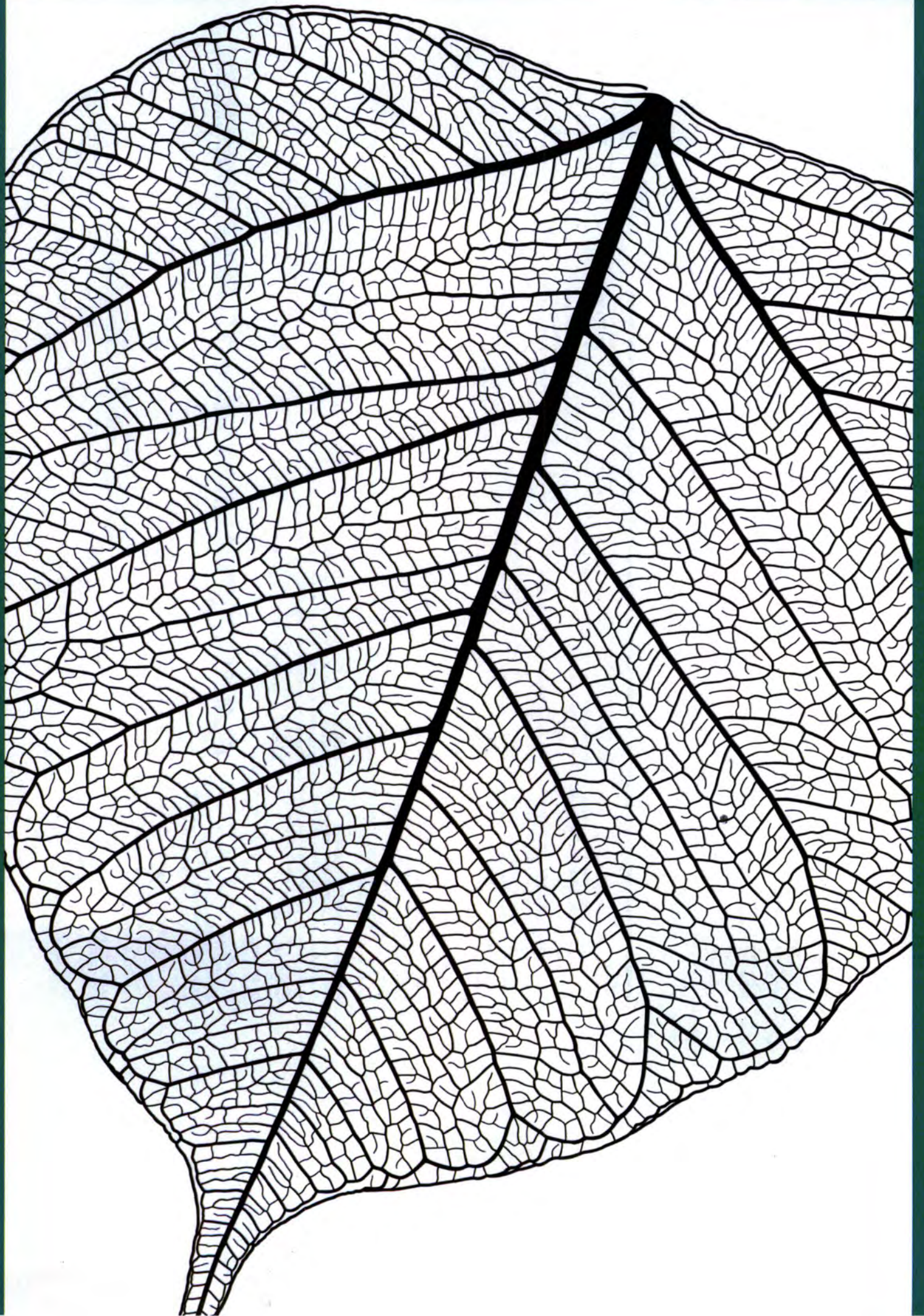


Artists Impression - Haydock Green



06. BENEFITS AND DELIVERY





6. DELIVERY AND BENEFITS

Delivery

The land is within the single ownership of Peel, a "willing landowner" with a proven track record of delivering high quality, large scale sustainable urban extensions.

Peel is committed to a long term investment in the project, and a partnership approach to working with St Helens MBC as local authority. Through such commitment and partnership, this strategically significant opportunity can be realised for the benefit of the people of St Helens and the wider sub-region.

The land is being promoted through the Local Plan process. Subsequent to policy change (the extent of Green Belt designation), it could progress swiftly to a planning application to respond to Borough need and householder interest. The concept masterplan shows a comprehensive development strategy for the land to deliver up to 750 units as a sustainable urban extension.

An indicative programme for the delivery of the proposals at Haydock would see the comprehensive delivery of all employment and housing development of the scale suggested within the Plan period to assist in meeting the identified needs of the Borough.

The new homes would be suitable for delivery by national housebuilders and small/medium builders. It could also incorporate plots for self-building and an element of the development would comprise affordable housing and Starter Homes. The site would provide for multiple construction and sales outlets which could be delivered simultaneously.

The land can be readily integrated with the adjacent urban area, and delivered under the direction of and within the long term commitment of Peel as landowner and development co-ordinator.

An indicative programme for the delivery of the proposals at Haydock Green would see the comprehensive delivery of housing of the scale suggested within the Plan period to assist in meeting the identified needs of the Borough.

Sustainable Development

The suitability of the land to deliver the quantum of development identified has been considered; this is provided in a review of technical suitability in Appendix 1.

A Sustainability Assessment has also been undertaken which demonstrates that the proposal would comprise sustainable development assessed against the relevant environmental, economic and social objectives of national policy. This is provided in Appendix 2.

Social and Economic Benefits

The development of Haydock Green will have a significant and lasting positive social and economic impact for St Helens, via enhanced opportunities for local housing across a range of sizes and tenures, including affordable housing, and the creation of jobs, during the construction process. A review and quantification of those Benefits is provided in the infographic.

Environmental Benefits

New and improved green infrastructure including landscaping, ponds and SuDS drainage will be provided on site and around site boundaries linking to existing woodland areas and site features for public access opportunities and biodiversity and

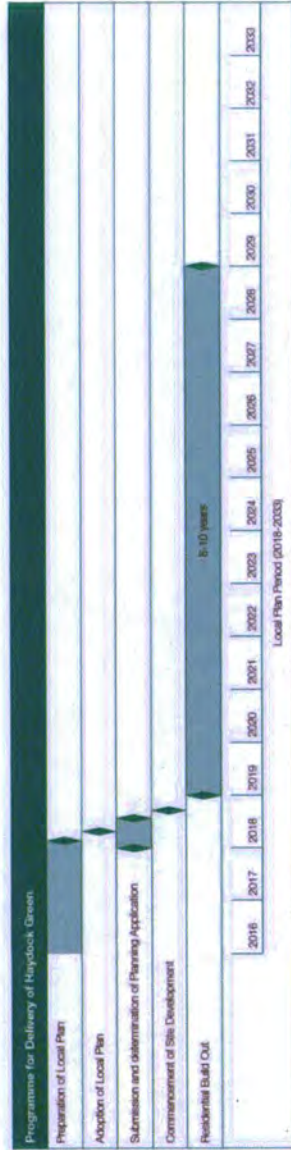
habitat creation. It will also provide visual benefits and afford long term defensible boundaries for the Green Belt revision.

The proposal will provide an urban extension in a location that is accessible by a range of means to existing facilities and services and to existing and proposed employment areas.

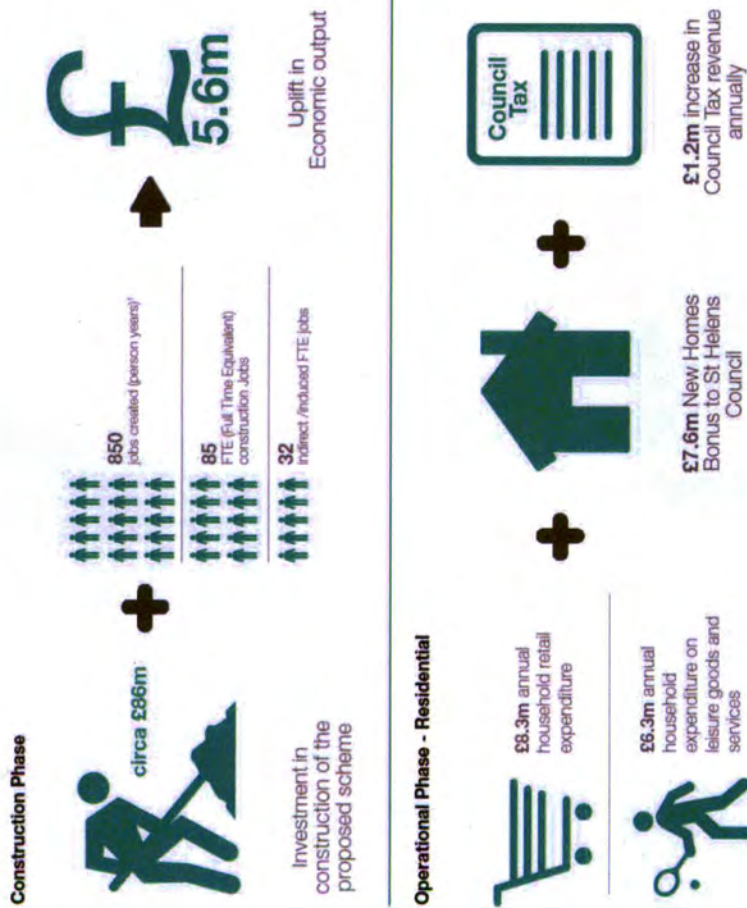
Conclusion

Haydock Green is a deliverable proposal to meet current national and local needs for housing in a highly accessible location as a planned and sustainable urban extension in a landscaped setting.

The release of the land will not harm the strategic function of the Green



Economic Benefits Summary

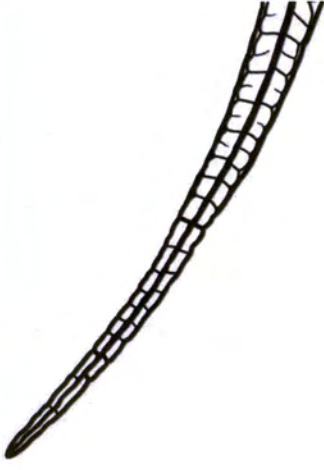


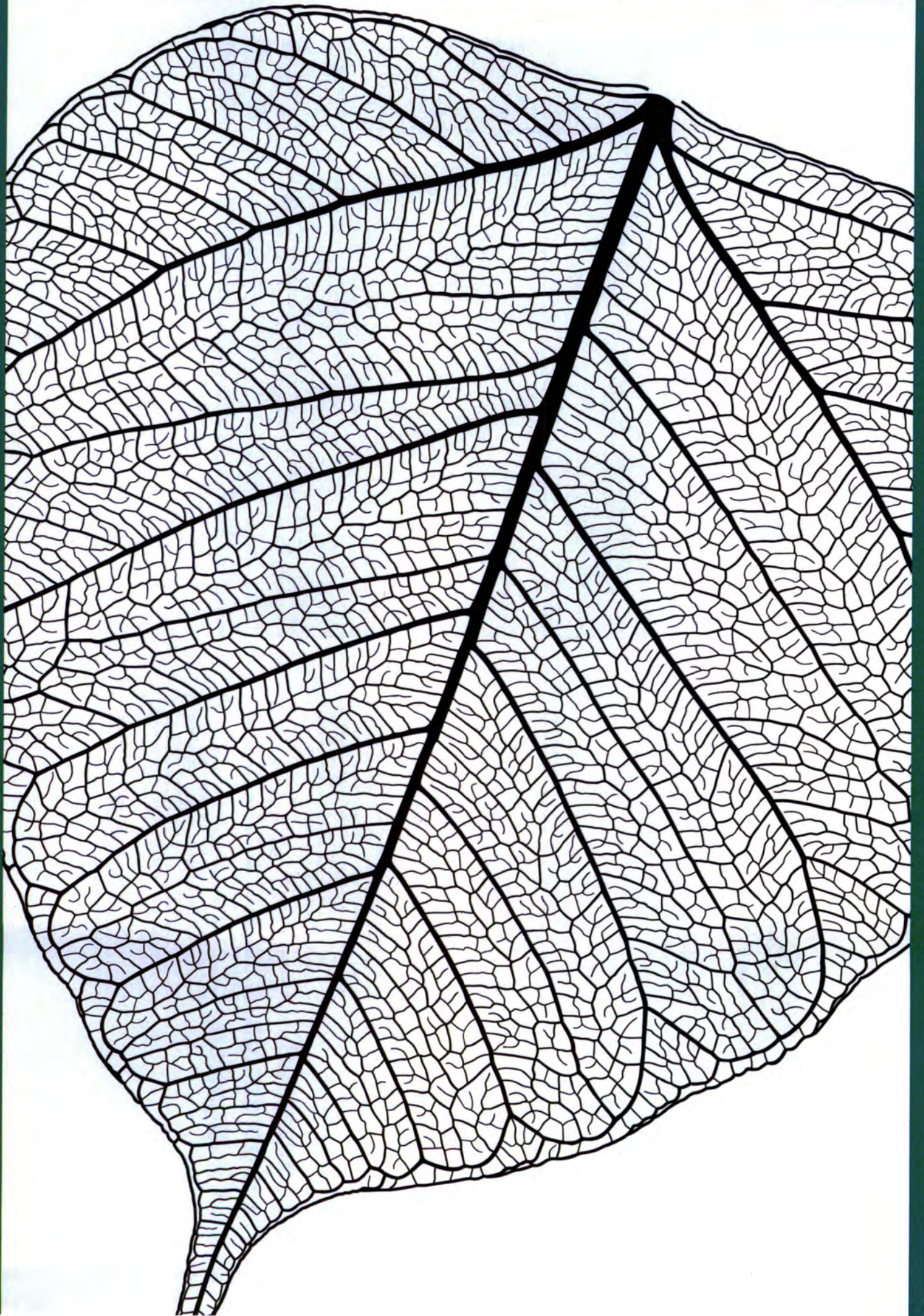
In Conclusion

The proposals can be delivered by Peel in collaboration with stakeholders to create new homes and new accessible greenspace for the benefit of the Borough.

APPENDIX

- 1 - Technical Suitability
- 2 - Sustainability Appraisal
- 3 - Peel Group





APPENDIX 1

The land is suitable for housing development, and is not subject to technical or environmental constraints that cannot be addressed through design and mitigation.

Technical Suitability

The land has been subject to assessment via a series of technical studies to confirm its suitability and deliverability for development. The key findings and any recommended mitigation is summarised below.

Location and Context

Relationship with Settlements/Urban Form

The 37 hectares of land is located on the south west quadrant of Junction 23 of the M6/A580 roundabout, between Haydock in the north and Newton le Willows to the south.

It connects to the urban edge of Old Boston, the eastern residential area of Haydock, and extends along the strategic road infrastructure to form an easterly extension to the urban area of Haydock.

It is contained on three sides by built development/playing fields and road infrastructure and therefore forms a logical extension to the urban area. To the west is also the Lyme and Wood Pits Country Park that provides a key recreation facility to the south Haydock area.

Significant tree belts along the southern boundary of the land can be retained and reinforced to provide a permanent southern boundary to built development. This landscaping also allows opportunity to provide future green infrastructure and accessibility/ linkage into wider open land to the south and to the Country Park to the west along with links to the wider Peel land to the east via a co-ordinated Haydock Parklands proposal¹⁰.

Proximity to Facilities

A Transport Appraisal by Vectros details the accessibility of the land on foot, by cycle and by public transport, and the location and accessibility of local facilities including shops, schools, health facilities and leisure facilities.

The 2km pedestrian catchment and 5km cycle catchment encompass large areas of the surrounding settlements of Haydock, Newton le Willows, and Ashton in Makerfield, including their local centres as well as schools and health and leisure facilities. Research has shown that many of these local schools and health facilities have current capacity to accommodate further pupils/ patients.

The land is highly accessible to the existing employment area of Haydock Industrial Estate by foot/cycle with pedestrian crossings to the A580 allowing ease of movement.



Strategically Connected

The land has excellent connections to the strategic road network in the Borough of St Helens, with direct frontage to the A49 which provides immediate access to the M6 in both directions via Junction 23. This access allows onward connection to the regional motorway network of the M62/M58/M61 and to major centres and facilities in the North West and The local highway network in the direct vicinity of the site also offers key links to employment centres including St Helens, Warrington, Newton-le-Willows and Heydock. Such connectivity is a key requirement for residential development.

Vehicular Access

junction 23 has been recently improved as part of the national Pinch Point Programme to enhance the capacity and safe operation of the junction which was acknowledged to have a poor accident record and experience a level of congestion at times.

An assessment of traffic distribution associated with the development proposals, and detailed modelling of the operation of the motorway junction and its slip roads under various access options, has been undertaken in consultation with the Borough Highway Authority, the Highways Agency (now Highways England), and the agents JMP.

Initial technical work shows that access and junction solutions are available to deliver the scale of development proposed around M6 Junction 23²¹ whilst also providing a material benefit to the operation of the junction itself.

Vehicle access to the land is suggested from both Vista Road and the A49 Lodge Lane via priority controlled junctions. This is considered an appropriate form of control given the forecast traffic generation of the land and proposals. Opportunity to achieve an east-west route through the land is also possible.

Detailed design of the access proposals will be progressed by the development team. As such, the highway arrangement in this Prospectus is indicative and will be subject to further design evolution and discussion with the Highway Authority/ Highways England.

The assessment also involves consideration of the traffic impact on the A49 (south) arm of Junction 23 of the M6 and consultation is ongoing with the Highways Authority and Highways England.

Connectivity by public transport

The land is accessible by bus with four services per hour operating along Vista Lane to the west with further frequent services also operating along Penny Lane to the north. These, and services in Newton le Willows, provide access to the immediately surrounding settlements and to wider towns including St Helens, Wigan and Warrington.

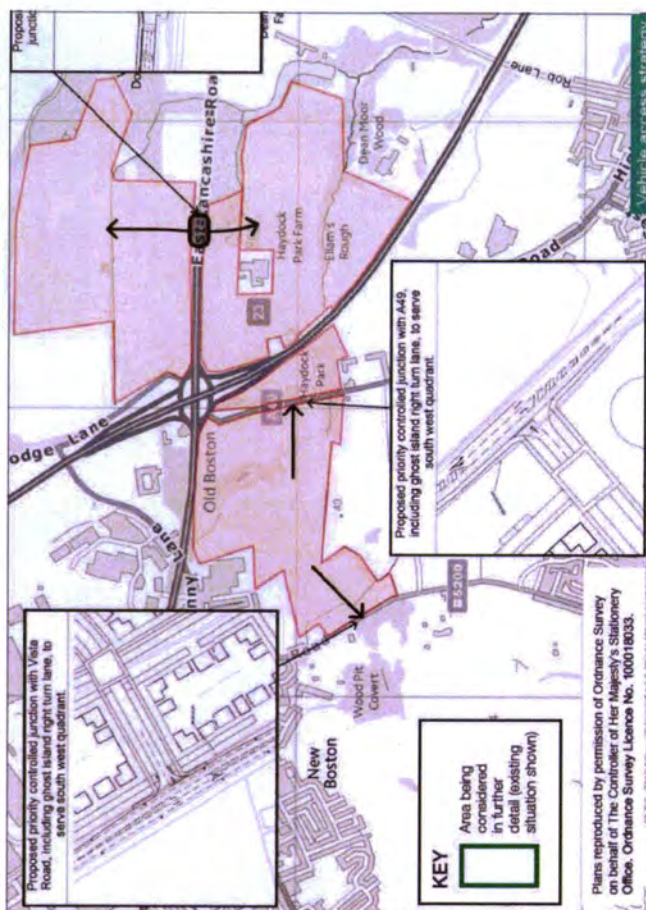
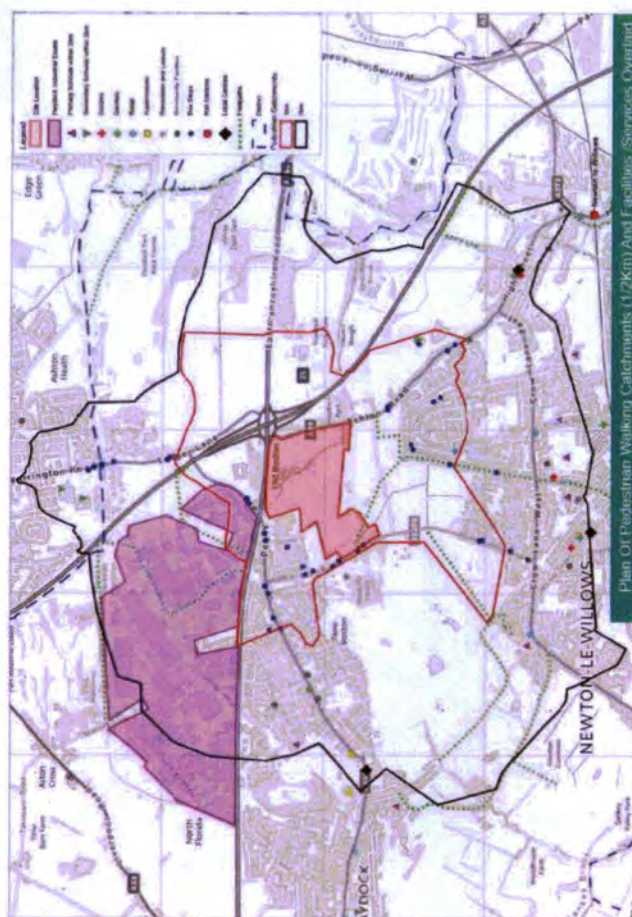
Newton le Willows railway station is also located within the 2km pedestrian and 5 kilometre cycle catchments and provides car and cycle parking facilities to travellers. The station is situated on the Liverpool-Statbridge line and rail services provide access to Liverpool, Manchester and Chester.

From an accessibility and public transport perspective, the land is considered to be technically acceptable and suitable for development for residential purposes. Should a detailed accessibility assessment outline that it is necessary to provide enhanced public transport facilities, consideration can be given to routing bus services through the future development layout.

Pedestrian and Cycle Connectivity

Pedestrian and cycle access to the land can be provided from both Vista Lane and Lodge Lane to ensure that the land is highly accessible and linked to surrounding settlements, facilities and existing public transport services that operate in the area.

Good standard and lit existing footpath and cycle routes are present in the vicinity of the land. An off road cycle route is present along the A580 with crossing points to the M6 junction and an on-road cycle route is present along Vista Lane.



Environmental Considerations

Land Use/Green Network

The land is within single private ownership and is not subject to open public agricultural use, and is not subject to open public access. A footpath crosses the land between Newton-le-Willows and Vista Road but does not provide wider access across the land.

The land contains a number of tree belts both within and on the boundaries which provide a green network in ecological and landscape terms, but not in public access terms. These include historic plantation areas / woodlands and Eilam Brook.

Vista Lane football pitch to the north provides a formal open space function, whilst the Lyme and Wood Pitt Country Park to the west is a strategic recreation area in the Haydock/ Newton-le-Willows area with footpath, cycle, fishing and heritage interpretation functions.

Development of the land will enable an enhanced public access and green networks to be provided within the land and linking to existing settlements and surrounding green infrastructure. As above, options for providing improved greenspace and connectivity to the south and to wider Peel land to the east are also being explored.

Ecology and Trees

A Phase 1 Habitat survey and tree survey has been undertaken at the land by TEP to record habitat types, likely presence of protected species, tree quality and to identify any ecological/arboricultural constraints to development.

The findings show that the land comprises largely arable/grassland fields that are of low ecological value. Blocks of mature woodland which include some veteran trees, streams, ponds and hedgerows are present on the land and around its boundaries and are of higher ecological value. Ponds, woodland and hedgerows are habitats of principal importance under the Natural Environment and Rural Communities Act (2006) and hedgerows are a priority habitat under the local Biodiversity Action Plan. There are no nationally/internationally designated wildlife sites within 2km of the land.

A Local Wildlife Site is located within the land and further LWS are within 1km. The on-site LWS comprises Wicken Hedge and Eilam's Brook designated for its woodland and wetland habitats.

A Tree Preservation Order (TPO) is present on the land encompassing tree groups within the centre and along the southern boundary of the land (Haydock Park (No 5) 1993). A further small group of trees, along with these two areas, are considered of high value. Other tree groups in and on the boundary of the land are described as category B (medium quality) or low quality. A preliminary ground level appraisal has concluded that mature trees in the south of the land have potential to support roosting bats and breeding birds.

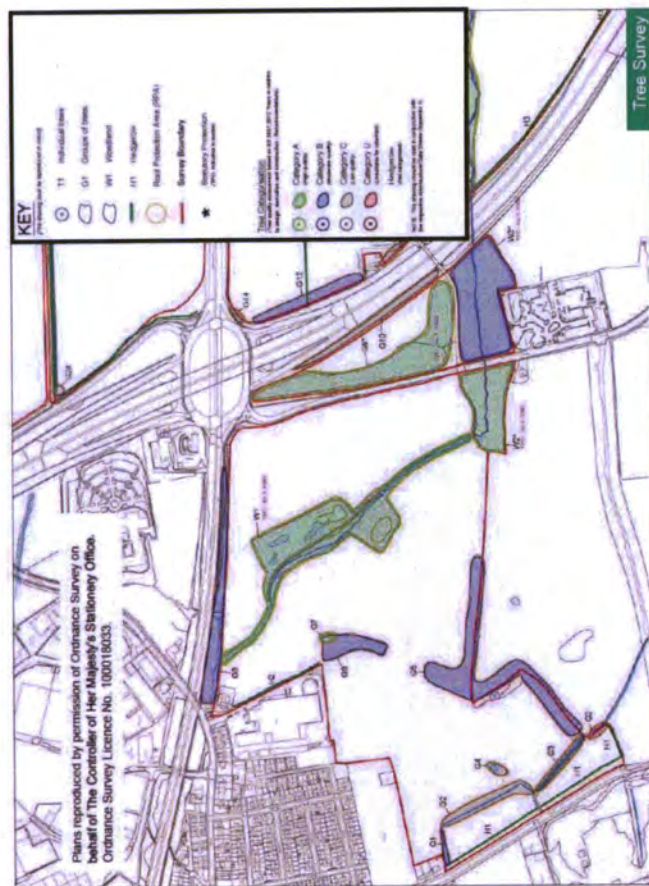
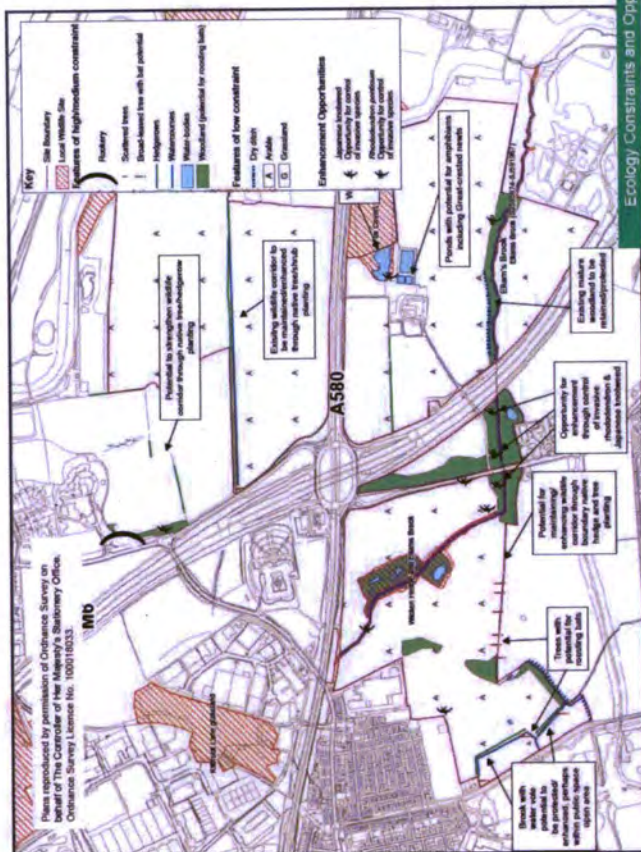
In terms of fauna, the survey has identified water vole potential in the Brook however no other protected species were found.

Following initial surveys there appear to be no overriding ecological constraints to development at the land. Additional detailed surveys will be undertaken to inform final development options and any mitigation strategy.

Woodland/hedgerows and watercourses form habitat corridors through the land. There is scope to incorporate these within the option masterplan and future development subject to infrastructure and access.

Notwithstanding this, the incorporation of additional planting as part of the overall future development will enable mitigation for any tree losses arising.

Additional planting associated with future development can also be fully considered at a future planning application stage to provide a strengthened permanent Green Belt boundaries and ecological and green network enhancements



Landscape and Visual

The land lies within the Green Belt and is being promoted for removal from the Green Belt and allocation; an alternative long term permanent boundary is considered possible having regard to Green Belt purposes.

In landscape terms, the land is adjacent to the environmental improvement corridors of the M6/A580 and within an area for landscape renewal. The land is also within the Lancashire Coal Measures National Character Area which highlights the historical mining landscape and settlement form in the area, and the St Helens Landscape Character Area for the historic Haydock Park.

The landscape assessment has confirmed that the historic park landscape is now highly fragmented and divided by the M6/A58. The key characteristics of the area is now generally flat, predominantly open agricultural land with mature woodland blocks and irregular field patterns. It is also influenced by the urban area of Old Boston at the north. It is concluded that the boundary context and hedgerows/woodland across the land results in there being primarily short range and contained views.

The road infrastructure of the A580 and M6 also represents a key urban and negative feature in the landscape, particularly the elevated section of the M6.

Key receptors in the area comprise the properties on the edge of Old Boston and users of the footpaths along the adjacent roads and through the land.

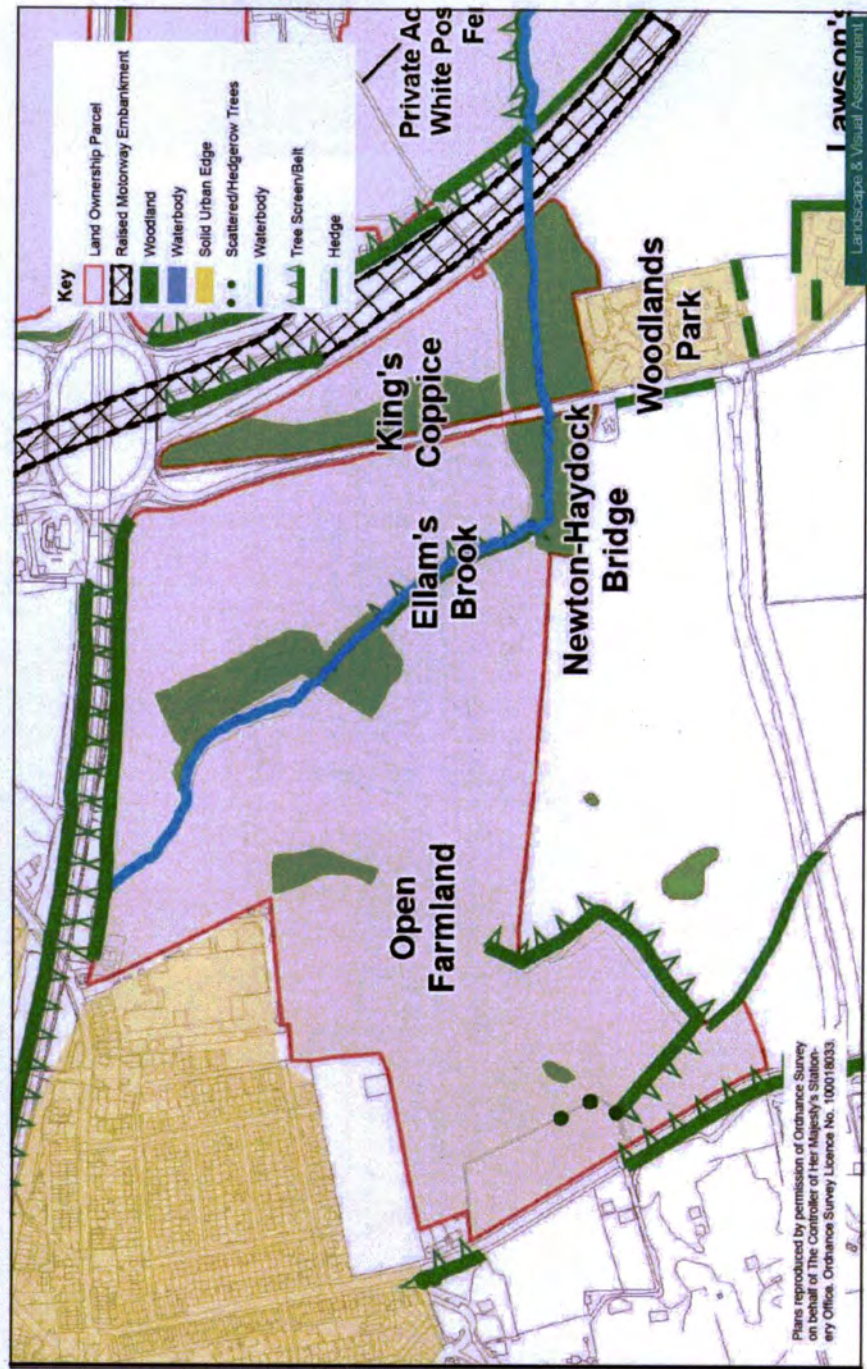
The landscape character of the area has been concluded to be of moderate to strong character primarily due to field patterns and woodland planting with a medium sensitivity to change.

The published landscape assessments of the land also highlight a range of opportunities for future development including to retain hedgerows, ponds and woodland and provide enhanced green infrastructure features with potential for public access/recreation and connectivity with the urban areas, new habitats and sustainable drainage systems. Such opportunities can be embraced by the masterplan and provide a positive accordance with the assessments.

The landscape analysis has also concluded that development of the land can ensure appropriate

scale and screening to the existing urban edge of Old Boston and enhanced planting to the southern boundary can contain views and ensure continued separation of the settlements to Newton-le-Willows. Such additional landscape buffer can provide opportunities for softening the urban edge and an enhanced green network in ecological and public access permeability.

Overall, it is concluded that the development of the land can be accommodated in landscape terms.



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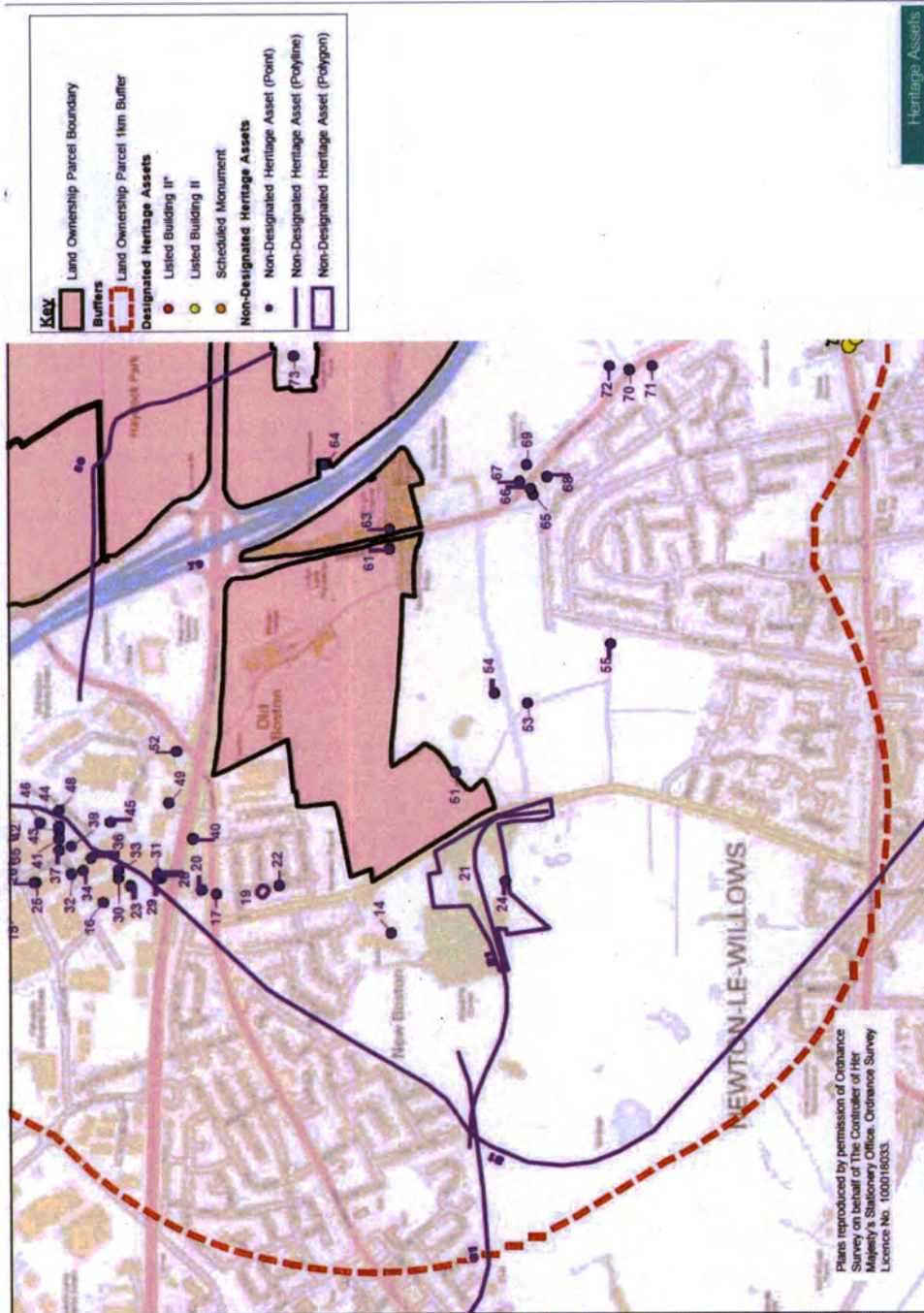
Heritage

Designated and non-designated assets within 1km of the land have been researched as well as potential for archaeological assets.

There are no designated assets within the land; 14 assets are within 1km of the land comprising the Castle Hill Scheduled Monument now within Haydock Park golf course, and 11 listed buildings (Grade 2*/Grade 2). Due to separation distances and intervening uses, the land does not affect the setting of these assets.

There is one non designated assets within the land (Wiswall) and two on the immediate site boundary (fodge and boundary ditch) and further assets with 100m of the land. There is also evidence of historic field patterns on the land. To a large extent, such landscapes have been lost or heavily changed by recent road and built development such that only remnants of historic features remain.

It is considered there is a low potential for prehistoric/medieval assets at the land. There is considered to be high potential for presence of undiscovered archaeological assets from the post medieval/modern periods at the land and this can be considered via appropriate mitigation/recording at a future development stage.



Ground Conditions, Infrastructure and Services

Noise

Noise monitoring was undertaken in the area in February 2014 with the main noise source recorded being road traffic from the M6/A580, with effects reducing with distance from the roads and away from elevated sections of roads. Noise from other uses around the land including the Amia food factory and electricity substation are not significant.

Key noise receptors in the vicinity of the site are properties on the east of Old Boston and footpath users. Such receptors can be considered in any masterplan in relation to screening and orientation of buildings and road layout.

Mitigation measures in the form of building positioning, orientation, height, materials/finishes, open space orientation and acoustic screening, can also reduce the effects of noise from adjoining roads on the proposed development and would enable noise levels to be in line with WHO guidelines. Open space and woodland screening can also be considered in areas closest to the roads where necessary.

Air Quality

Air Quality Management Areas have been designated along the M6 (encompassing a 70m zone along the motorway and extending into the land) and at High Street, Newton le Willows since 2006 following concerns that concentrations of NO₂ in the vicinity of the M6 were exceeding annual mean AQ Objectives.

Further assessments undertaken for the Council in 2011/13 found that the AQMAs were still required and that reductions in NO₂ concentrations were unlikely to be met by 2015 without mitigation measures to reduce background levels or traffic emissions.

The key air quality considerations from development at the land will be from traffic and a full air quality assessment would be undertaken when final development options are known.

Ground Conditions

A Phase 1 Desk Study and Preliminary Ground Conditions Risk Assessment have been undertaken.

The land lies close to a former colliery (Lyme Pit to the west); there are records of four mine shafts on the land and the area is potentially underlain by former mine workings. This mining history will be subject to further investigation and can be accounted for in the masterplan if necessary; it is of note that former mined areas cover a large proportion of St Helens Borough and surrounding Boroughs and can be subject to established review and mitigation measures to enable development schemes to proceed.

There is also some evidence of made ground on the land and this can also be fully reviewed in more detailed ground investigations to be undertaken prior to site development.

Pipelines

Two pipelines cross the land running from north to south.

It is understood that a Shell pipeline located towards the western side of the land is not operational, however an easement of c. 3m either side of the outer wall of the pipe can be maintained in the option plan and further consultation can be undertaken with the operator in due course.

The North West Ethylene Pipeline runs to the west of Lodge Lane and is a notified installation. The operating easement is 6m either side of the pipeline and is likely to be required to be kept clear of development and landscaping. The pipeline is also subject to 3 zones of sensitivity for potential future development. From review of the Health and Safety Executive Guidelines, landscaping, access infrastructure and ancillary open space to a residential use of the land can be accommodated in the inner and middle zones, extending 11m from the pipeline. Within the outer zone, extending to 85m from the pipeline, residential development can accord with the Guidelines such that the pipeline should not form a constraint to future development. The masterplan can therefore have regard to these factors and discussions can be held with the HSE prior to development proposals proceeding to a detailed stage to confirm requirements.

Energy

A number of electricity lines pass over and underground through the land and along the roadways of A580/A49 to serve the surrounding settlements. There is scope as part of future development options to retain or if necessary divert services to ensure necessary connections are maintained and to serve development at the land.

The utilities review has also highlighted that electrical capacity is available in the area, but that future development will need to consider this capacity level and a number of substations/transformers may be required.

There are gas services in the roadways around the land and it is not anticipated that there are any gas supply issues in the area.

Water

As undeveloped land, no water supply is available to the land; this would be incorporated into the detailed scheme design stages in consultation with the provider.

Flood Risk and Drainage

The land is located in Flood Zone 1 on the Environment Agency flood map and is not at risk of flooding.

Ellam's Brook crosses the land and runs to the east and public sewers cross the land.

A SuDS drainage system can be provided to offer environmental and ecological enhancements. This will have regard to ensuring greenfield run-off rates and the drainage strategy will also seek to mimic the current north to south surface water flows arising from the land. Full regard will be had to EA, Building Regulation and SuDS guidance in the final scheme for the site.

A series of technical studies on the land have highlighted that there should not be any significant or insurmountable constraints to future development of the land for residential development. The studies have outlined any key issues that can be addressed in the detailed review of the land and its fuller consideration for progression to planning application stages in the future, particularly in respect of highways and access options. They have also outlined mitigation and further assessment areas that can be undertaken to ensure that future development can proceed without technical objections. As a result, it is concluded that there are no technical reasons to prevent allocation of the land for future development.

APPENDIX 2



Sustainability Assessment: Haydock Green

Sustainable development objective	St Helen's Local Plan SEA Framework Objectives	Assessment	Contribution
1. Economy - building a strong and competitive economy	To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth	The site can deliver three distinct housing character parcels forming a sustainable urban extension of around 750 new homes, including larger aspirational family housing and affordable housing to meet local needs. This can be delivered by a developer with a strong track record supported by housebuilders to ensure a planned growth of the settlement and Haydock area. During the operational phase, the population of the site could reach c1,725 which could contribute c£14m to the local economy via retail and leisure spend of the residents. The development would contribute around £7.6m in New Homes Bonus and £1.2m annually in Council Tax Receipts.	✓
	To ensure local residents have access to employment opportunities	The location of the site and its accessibility by a choice of means (as set out below) will ensure that residents/workers of St Helens Borough have access to the site for employment opportunities during site construction.	✓
	To improve the education and skills levels of the population overall including increasing opportunities for training and employment opportunities	The development of the site will create local jobs and likely training opportunities during the construction phase of development.	✓

Sustainable development objective	St Helen's Local Plan SEA Framework Objectives	Assessment	Contribution
2. Transport - promoting sustainable transport	To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make best use of existing transport infrastructure	Nearest train station – Newton-le-Willows: Min 2.1km, Max 3.5km Nearest bus service – Vista Road: Min 40m, Max 750m Accessibility from the A49 Lodge Lane and Vista Road for car, pedestrian and cycle access to allow connection to the services/ facilities of Haydock and Newton le Willows. Also in close proximity to existing and proposed employment areas at Haydock and the wider Peel land to minimise the need to travel to employment. The development can incorporate an east-west road link, capable of accommodating buses through the site and has potential to support improved public transport services to the Haydock area (should improvements be necessary). Access potential from Lodge Lane/Vista Road has been subject to initial technical review to confirm that access and junction solutions can deliver the scale of development proposed. Wider highway network capacity and potential improvements to A49 junction have also been agreed in conjunction with the Local Highway Authority and Highways England.	✓
	To improve access to and use of basic goods, services and amenities in town and local centres	Nearest supermarket – Aldi/ Tesco, Haydock: Min 2.1km, Max 2.3km Nearest GP – Newton Medical Centre: Min 1.9km, Max 2.3km Nearest Dentist – Haydock Dental Practice Min 1.1km, Max 1.3km Local Centre – Newton le Willows, High Street: Min 1.4, Max 2.9km / Primary schools – Haydock/ Newton le Willows: Min 2.3km Secondary schools – Haydock/ Newton le Willows: Min 0.6km	
	Sustainable transport	The site is within walking and cycling distance of local services and amenities in Haydock/ Newton le Willows. Bus stops are located in close proximity on Lodge Lane and Vista Road with services to Haydock/ St Helens, Ashton-in-Makerfield, Golborne and Newton-le-Willows. Newton-le-Willows rail station is located within approximately 2km of the site and provides regular train services to Manchester, Chester and Liverpool. A residential Travel Plan would be prepared to encourage residents to utilise sustainable modes of transport for commuting and leisure journeys. The site has potential to incorporate new pedestrian and cycle facilities to link the site to surrounding settlements. Haydock Parkland green infrastructure improvements being considered by Peel could also improve the green network accessibility to the south and east of Haydock.	
3. Homes – delivering a wide choice of high quality homes	To improve access to a range of good quality and affordable housing that meets the diverse needs of the borough	The site can deliver a sustainable urban extension of around 750 new homes of mixed size, type and tenure, including larger aspirational family housing and affordable housing to retain key socio-economic groups and meet local needs. The new homes will be suitable for delivery by national housebuilders and/or small-medium sized builders. The site could also incorporate plots for self building.	✓

Sustainable development objective	St Helen's Local Plan SEA Framework Objectives	Assessment	Contribution
4. Design - achieving good design	To reduce crime, disorder and fear of crime	The masterplanning and design of the development can embrace the character and quality of the neighbouring urban areas, retain existing landscape features of the site and meet all relevant design standards. It would seek to achieve a high quality of design to create a sense of place and establish an attractive, safe area.	✓
	Green Infrastructure	The development can deliver public access to existing mature woodland and wetland areas within the site, and create a range of new areas of green infrastructure. This could also include a new Village Green as the community focal point for residents. The site could also link to wider greenspace and infrastructure improvements being considered by Peel to the south and east of Haydock including access to woodlands to the east of Lodge Lane and extending to proposed logistics development areas east of the M6 and linking to Lyme and Wood Pit Country Park to the west.	✓
	To improve health and reduce health inequalities	Whilst a public footpath crosses the land, there is no current public access to the majority of the land. Hedgerows, ponds, and woodland will be retained, where possible, and new greenspaces and sustainable drainage systems created which can incorporate public access where possible for increased leisure and open space activity.	✓
5. Health and community - promoting healthy communities		The need to accommodate residential development in the Borough is clear – which will necessitate Green Belt release as identified in Local Plan Scoping and evidence documents. The clear needs and the sustainable pattern of development that can be achieved adjacent to the existing urban area merits the release of the land from the Green Belt. Essential principles of Green Belt can be maintained including separation between settlements and preventing encroachment/ sprawl into the wider open areas via establishment of a clear strong boundary (that can be reinforced where weaker).	N
6. Green Belt - protecting Green Belt land		The gap to the south can also be retained through the provision of an enhanced landscaped boundary and the potential for creation of parkland greenspace infrastructure connecting between Lyme and Wood Pits Country Park, Haydock Green/ south Haydock and wider Peel land to the east. The land is located in Flood Zone 1 and is not at risk of flooding.	
7. Climate change - meeting the challenge of climate change	To mitigate and adapt to the impacts of climate change	A SuDS drainage system can be provided for environmental and ecological enhancements. This will seek to maintain greenfield run-off rates and mimic the current north to south surface water flows arising from the land. The site proposals would incorporate green infrastructure which would act as a natural source of cooling to mitigate against future temperature increases. The design of homes could also incorporate climate resilient features such as shading and natural ventilation.	✓
	To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties	A SuDS drainage system can have regard to ensuring greenfield run-off rates and current surface water flows to minimise risk of flooding.	✓
	To minimise energy use and increase the proportion of energy both purchased and generated from renewable and sustainable sources	Masterplanning and detailed design can enable the development to accord with necessary sustainability codes and regimes for residential development.	✓
	To reduce the amount of waste, and to increase in order of priority, the proportion of waste reused, recycle and composted and recovered	The site development would incorporate sustainable waste measures during construction and have regard to Borough waste recycling strategies during occupation.	✓

Sustainable development objective	St Helen's Local Plan SEA Framework Objectives	Assessment	Contribution
8. Natural environment – conserving and enhancing the natural environment	To protect and enhance biodiversity, ecology and geodiversity (habitats and minerals)	The findings of the Phase 1 Habitat survey and tree survey show that the land comprises largely arable fields that are of low ecological value. Blocks of mature woodland, veteran trees, streams and hedgerows are of higher ecological value with potential to support bats and breeding birds and include a local wildlife site and TPO trees – these can be positively planned for in the site masterplanning. New planting and habitats could also be provided for enhancement of biodiversity. There are no nationally/internationally designated wildlife sites within 2km of the land.	✓
	To protect and improve land quality in St Helens	The land is in arable use. Due to previous mining activity there is potential for some ground condition issues in places; site investigations and normal residential site development options could result in land quality improvements if relic mining issues are found.	✓
	To improve air quality in St Helens	The site lies in proximity to two AQMAs which can be taking into account in site development. The site is accessible by a range of means and in proximity to services/ employment opportunities to minimise the need to travel.	N
	To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside	The land is adjacent to environmental improvement corridors and within a number of landscape character areas, however these do not constrain development of the land. Site landscaping and its relationship to the urban area of the north result in short range views across the landscape. Woodland, hedgerows and watercourses will be retained, where possible, and new landscaping provided to enhance green infrastructure features in the landscape with potential for public access to enhance enjoyment of the area. There is also potential for a southern landscape buffer to the site to provide wider visual and public access permeability linking between Lyme and Wood Pits County Park, land to the south and wider land to the east.	✓
9. Historic environment – conserving and enhancing the historic environment	To protect, enhance and make accessible for enjoyment the cultural heritage and historic environment	The site does not lie within a conservation area and there are no locally or nationally listed buildings or designated assets within the immediate surrounding area. 1 non-designated heritage asset on the site boundary can be accounted for in site masterplanning. Historic field patterns on the land and are largely influenced by hedgerows and woodland areas. Such features can be retained and considered in masterplanning and site development.	✓
10. Mineral resources - facilitating the sustainable use of minerals	To protect and enhance biodiversity, ecology and geodiversity (habitats and minerals)	The site is not within a minerals safeguarding area.	N

APPENDIX 3

The Peel Group

The Peel Group is one of the leading infrastructure, transport and real estate companies in the UK. It is more than 40 years since John Whitaker, the Chairman of Peel, established the foundations that form the Company as it is now, through a philosophy of recycling capital and long term investment, predominantly in the North West of England.

Peel's vision is to create sustainable environments where people and businesses can flourish. The Company has its roots firmly in the North West and has a very strong track record of property development and regeneration that includes the decades of sustained investment in Salford Quays culminating in the delivery of MediaCityUK.

Peel is supportive of the Northern Powerhouse and the opportunities that it can bring to the region in terms of growth, investment, jobs and environmental and social benefits. Peel have actively sought to engage with government and the regional stakeholders to take forward the growth agenda and have produced the report "Peel in the Powerhouse" to confirm their commitment to active delivery of development proposals and growth in the region.

As a strategic land holder across the North West, Peel takes a long term and connected view of the region, as set out in key regional investment programmes initiated by Peel including:

- Ocean Gateway
- Port of Liverpool and Manchester Ship Canal Master Plan

Peel as a major landowner have significant experience in promoting and delivering housing proposals and developments on substantial sites and as urban extensions, including sites in Merseyside, Greater Manchester and Lancashire.



Precedent Images



Precedent Images

REFERENCES

-
- ¹ Site Prospectus documents Haydock Point North and South
 - ² Site Prospectus Haydock Parkland
 - ³ DCLG (2012) "Laying the Foundations"/DCLG (2016) "Corporate Plan"
 - ⁴ Peel (2015) "Peel in the Northern Powerhouse: with Powerful Partnerships working together to deliver 150 projects in the North"
 - ⁵ St Helens Borough Council (2015)
 - ⁶ GL Hearn (2016) "Mid Mersey Strategic Housing Market Assessment"
 - ⁷ DCLG (2012) "National Planning Policy Framework"
 - ⁸ GL Hearn (2016) "Mid Mersey Strategic Housing Market Assessment"
 - ⁹ Site Prospectus Haydock Parkland



Haydock Green

**Appendix 5: Haydock Green updated residential
development framework plan
(March 2019)**

Key

-  Proposed All Movements Junctions:
A580 Signal Controlled and A49 Priority Controlled.
(Subject to further design development and consultation).
-  Proposed Route of A49 Lodge Lane Diversion (30 mph) through the proposed Haydock Green Residential Development Site.
(Subject to further design development and consultation).
-  Potential to retain southbound movements onto the A49 Lodge Lane from Junction 23: M6.
(Subject to further design development and consultation).



Notes

Sufficient land controlled by Peel and the Highway Authority is available to deliver the proposed routes and junctions to meet recognised highway design standards.

Whilst further design investigations would be subject to detailed capacity assessment, it is anticipated that the proposed A580 junction will be signal controlled and allow vehicles to turn east towards the M6 and Manchester and west towards St Helens and Liverpool.

The Masterplan shows a location in which a junction fully compliant with recognised highway design guidelines can be delivered. However, alternative locations for a junction with the A580 are also available within the frontage of the Haydock Green site, and the Haydock Green Masterplan could be amended to accommodate an alternative alignment should this be a preferred option.

The diverted A49 route would be designated as a 30mph zone and designed to adoption standards. The realigned route would not prejudice the opportunity for residential development on either side, and could also act as a local distributor road for areas to the east.

Lyme and Wood Pits
Country Park

Haydock Green Masterplan

Opportunities for Capacity Improvements at Junction 23: M6

28th February 2019

Appendix 6: Haydock Green Sustainability Appraisal

APPENDIX 6: Council's SA of Haydock Green and Peel's suggested alternative

SA Objective	Council's SA Score	Council's commentary	Peel's Recommended SA Score	Peel's commentary and justification for amendment
SA1 Biodiversity		Site overlaps with a Local Wildlife Site, a Local Site (Ellams Brook), and a TPO. Effects considered likely.		Preliminary ecological surveys indicate that there are no ecological constraints that cannot be mitigated within future development proposals. The illustrative masterplan as presented retains key features of ecological value, including the LWS, areas of woodland and waterbodies.
SA2 Land Quality		Site contains no ALC Grade 1-2. Over 49% of the Site overlaps with ALC Grade 3, totaling 16.22ha		Agree
SA3 Air Quality		Large scale site (520 units) located 67m from AQMA		Agree
SA4 Sustainable Water Resources		171m from nearest protection zone		Agree
SA5 Climate Change		Site presents opportunities for enhancement of GI network.		Agree
SA6 Flooding		100% of site located in Flood Zone 1.		Agree
SA7a Landscape Sensitivity		Over 96% of the site within a Low-Medium or Medium landscape sensitivity area, but site is over 3.2km from a prominent ridge line.		Agree

SA7b Distances to Ridgeline	See above		See above
SA8 Cultural Heritage	Site is located 0m from an Archaeological Interest (Lodge Lane). Effects on setting considered likely.		No evidence has been presented to identify the heritage assets in the vicinity of the site nor to assess the potential development's impact in this regard. Until such time that this is undertaken on a robust basis, a neutral effect should be assumed.
SA9 Access to and protection and enhancement of public open space	Site contains open space. PROW intersects the south-west corner of the site (severance possible if not designed inclusively).		Proposed development will retain and enhancement PROW whilst opening up public access to newly created recreational and open space within the site
SA12 Health and equality reduction	Access to GP: Over 1.34.km from Dr A. James and Partners Access to Leisure: Within 1.2km of 3 Children's Play facilities.		Agree
SA13 Education and skill levels	Primary : Over 1.41km from Haydock English Martyrs' Catholic Primary School Secondary : 828m from Hope Academy		Agree
SA14 Access to employment opportunities	Site 12m from Woodlands Industrial Estate		Agree. Peel would also point out that the site is located close to employment areas at Haydock, including both existing and proposed logistics sites
SA15 Support the economy and foster balanced economic growth	Housing site on land suitable for employment		Peel would disagree that the development of the site would deprive St Helens of employment development, as implied. The site is not available for employment development and its suitability for this purpose has not been considered by Peel or the Council. Delivery of high quality family housing in close proximity to key employment

			areas (proposed and existing) will support the economic growth and prosperity of the Borough.
SA16 Access to good quality, affordable housing	Potential to deliver 520 units (450 within 0-15 years, 70 within 15-20 years). Potential deliverability constraints due to the sites role as a strategic gap, and traffic, noise and ecology issues.		As evidenced through the Site Prospectus, there are no insurmountable constraints to the site's development from an environmental or highways point of view, subject to an appropriate design approach to the site. The site can also deliver a major improvement to J23 of the M6 through the diversion of the A49 through the site, thus achieving a net improvement in traffic conditions on the network. The site's potential role as a strategic gap is not a deliverability constraint. This function is reflected in the site's Green Belt designation which is itself an 'optional' policy designation can be readily removed if justified.
SA17 Reduce poverty and social exclusion	Non-employment site	N/A	Agree on the basis that all housing sites are scored the same
SA19 Reduce the need to travel	6m from Bus Stop. Regular frequency service.		Agree
SA20 Improve access to and use of services in town and local centres	Residential site is 696m from the nearest convenience store or supermarket		Agree

KEY

Likely to promote positive effects	
Unlikely to have	

Appendix 7: **Haydock Green – employment
proposal framework masterplan**

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Turley

St Helens Pre Submission Local Plan
Representations on behalf of Peel Holdings
(Land and Property) Ltd

Policy LP405

EL0228_13-17

Other points
picked up in
Summary rep-
Paper 17

Paper 2: Assessment of Housing needs

March 2019

Turley

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Turley

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Client

Peel Holdings Land and Property (UK) Ltd

Our reference

PEEM2091

March 2019

Executive Summary

1. This report has considered the soundness of the housing requirement set out in 'Policy LPA05' of the Pre-submission Draft Local Plan (PSLP) with regards to its compliance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
2. Specifically, this has focused on the evidence published by the Council to justify its concluded need for 486 homes per annum in St Helens over the plan period (2016 – 2035), noting that this level of need is directly translated into the proposed requirement.
3. By way of context, this annual housing requirement has reduced by circa 15% from the 570 dwellings per annum proposed in the Preferred Options Local Plan (POLP). It equates to a total cumulative requirement for 9,234 dwellings over the plan period, reduced from 10,830 dwellings in the POLP.
4. It is recognised that the PSLP housing requirement and the underpinning evidence of housing need has been produced within the context of the NPPF and PPG, as revised in 2018. The revisions have introduced a new method for calculating housing need which has formed an important context for the change in the requirement. The Secretary of State issued changes¹ to the NPPF on 19 February 2019², after the publication of the PSLP, with updates made to Planning Practice Guidance (PPG) on the following day. These representations have been prepared making reference to the updated PPG, as this – or any future updates – will ultimately apply for the purposes of examining the St Helens Local Plan.

The Council's calculation of housing need

5. In arriving at the new housing requirement, the Council has correctly started by using the output of the standard method. In accordance with the PPG, it has then identified a number of circumstances where it is likely that the *'actual housing need is higher than the standard method indicates'*³.
6. Principally, the Council has identified that the method *'does not take into account the increased employment growth that is likely to result from the development of the sites that are allocated for employment development'*. These sites are integral to delivering the Council's growth strategy, which underpins the strategic policies of the PSLP. It is also noted that the Council recognises further justification for going beyond the standard method, acknowledging an *'upward pressure'* on the standard method figure on the basis of a long-term worsening of affordability.
7. Where such circumstances are acknowledged, the PPG makes clear that the impact on housing need will *'need to be assessed'* before the identified need is then subsequently translated into a housing requirement.

¹ Planning update: Written statement – HLWS1309

² MHCLG (February 2019) National Planning Policy Framework

³ PPG Reference ID 2a-010-20190220

8. In undertaking this assessment, the Council has drawn upon two new evidence-based reports, namely an update to the Strategic Housing Market Assessment ('the SHMA Update') and an addendum to the Employment Land Needs Assessment ('the ELNS Addendum'). Both reports were published in January 2019.
9. On the basis of this evidence, the Council has derived its proposed housing requirement by selecting '*the scenario that is considered to be the most realistic*' from the evidence base⁴. The selected scenario suggests that 486 dwellings per annum are needed, with this figure directly translated into the housing requirement in Policy LPA05.
10. This does represent an elevation from the output of the standard method for St Helens (468dpa), albeit only by a modest 18 dwellings per annum or 4%. The Council implies that this modest increase will support its growth strategy, and alleviate potential affordability pressures.

The Critique of the Evidence and the Housing Requirement

11. Peel welcomes the view expressed by the Council in the PSLP that there would be disadvantages in relying only on the standard method. Furthermore, Peel strongly supports the principle of identifying the housing needed to align with the Council's commitment to economic growth, with this ambition key to the PSLP. It is also important to recognise that the growth strategy is based upon the provision of employment land within St Helens to accommodate unmet needs from the City Region (and Warrington), specifically relating to demand for logistics and warehousing space.
12. Peel agrees with the Council that the proposed growth strategy is likely to be deliverable, in accordance with the PPG. This recognises the commitment of the City Region and the Government to support the Growth Strategy through the funding and investment agreed in the Devolution Deal. At a local level, it is acknowledged that the success of the strategy is dependent upon the take-up of employment land opportunities, specifically with regards to warehousing and logistics uses. There is strong evidence of high demand for land in these sectors in the borough and the City Region as a whole, with this evidenced further within other parts of Peel's representations.
13. Peel also agrees that in arriving at an appropriate calculation of housing need, building on the standard method, the key point of consideration for St Helens is the extent to which its pursuit of a deliverable growth strategy will result in a need for housing which exceeds that associated with a continuation of past trends into the future.
14. **However, the evidence in this report has identified that the proposed 4% increase from the standard method is not appropriate, and will not support the growth strategy for St Helens.** The housing provision that will actually be needed to enable the growth strategy – and in particular the anticipated scale of employment growth – is considered to be notably higher, thereby requiring a more pronounced elevation from the standard method.

⁴ St Helens Council (January 2019) St Helens Borough Local Plan 2020-2035 Submission Draft, paragraph 4.18.8

15. In arriving at this conclusion, the following represent key points of consideration and findings from the evidence base:

- In estimating the job growth that is likely to result from delivery of the growth strategy, the evidence base has applied a number of assumptions which collectively **underestimate the full potential for employment generation over the plan period**. This includes, but is not limited to, the unjustified removal of land north east of Junction 23 of the M6, which is part of Peel's land holdings. Further evidence to support the reinstatement of this site is included within other parts of Peel's representations to the PSLP;
- AMION Consulting ('AMION') has undertaken a critique of the Council's forecasting of job growth, and concluded that it **in the order of 17,000 additional jobs could be reasonably expected in St Helens over the plan period where alternative justified assumptions are applied to those used in the ELNS Addendum..** This aligns closely to the scale of job growth envisaged for the borough under the Growth Scenario in the City Region's Strategic Housing and Employment Land Market Assessment (SHELMA).
- The SHELMA assessed the housing needed to support the Growth Scenario using a consistent approach across the City Region, and **concluded that some 855 homes would be needed each year in St Helens to support such a level of job growth**. This is some 83% higher than the standard method. Further modelling has been presented in this report which draws upon the latest available evidence and applies reasonable assumptions with regards to changing labour-force behaviours. This modelling serves to broadly validate this level of need, albeit identifying that it is reasonable to assume that it could underestimate the full associated need where alternative assumptions are applied, in particular with regards to commuting.
- Even where a lower level of job growth is assumed – linked to the Council's own modelling of its growth scenarios (11,967 jobs; scenario 2 used as an appropriate minimum) – the modelling indicates that **considerably more than 486 dwellings per annum will be needed in St Helens over the plan period, contrasting with the conclusions of the SHMA Update**. It is estimated that closer to 600 – 800 dwellings per annum would be needed even to support this more modest level of job growth; and
- The evidence in this report has identified that the principal reason for this variation in the housing needed to support economic growth in St Helens relates to the **incorrect and unjustified treatment of future commuting flows in and out of the borough within the Council's modelling**. In linking housing provision with the anticipated creation of around 12,000 jobs on employment sites across St Helens, the Council's evidence base assumes that a substantial proportion of the new homes required to support economic growth are provided for outside of the borough. This position is not supported by either the current generation of emerging Local Plans in neighbouring areas, or any emerging outputs of a spatial framework for the City Region. Whilst it is accepted that it could be reasonable to anticipate some change in commuting dynamics where St Helens provides for

above trend employment growth – itself linked to providing for unmet employment land needs – the implied scale of change is unsubstantiated in the evidence, and unjustified and would need to be fully considered as to its impact on other authorities in the HMA / City Region.

16. Taken collectively, the above points of critique clearly confirm that **the PSLP must acknowledge that a greater need for homes will be created by its growth strategy. This must be reflected in a substantially elevated housing requirement.**
17. As a minimum, the evidence indicates that **the Council should consider a housing requirement which is closer to 600 homes per annum.** In the context of the growth plans being pursued and the scale of job growth associated, this should be viewed as very much the lower end of a potential range of need. The modelling has identified that **in excess of 800 homes per annum could justifiably be needed** where either the full scale of potential job growth is recognised, or a more modest change in commuting dynamics is accepted.
18. In accordance with the PPG, it is also advised that the Council **more fully considers the range of need calculated in the SHELMA** where, as noted above, a level of job growth more closely aligned with that identified by AMION was assumed to reflect a Growth Strategy for St Helens. The significantly higher derived figure in this previous assessment of housing need should form another point of consideration to take into account in setting the housing requirement.
19. It is also apparent that **recent rates of delivery strongly validate that there is a high demand for housing in St Helens.** Recent delivery has exceeded the figure derived from the standard method – and indeed the proposed housing requirement – by some way, lending further support to a more positive and appropriate uplift.
20. Finally, **the Council has failed to take account of the scale of affordable housing need in setting the housing requirement,** as required by the PPG. The Council's evidence confirms a substantial need which would not be met by a continuation of past delivery trends. The establishment of a higher housing requirement, aligned more closely to the need indicated as being required to support employment growth, would also offer significant opportunities to increase the provision of affordable housing to meet needs in full. This should be given full consideration in arriving at an appropriate housing requirement.
21. **In order for the PSLP to be found sound, the Council must revisit and elevate the calculation of housing need to accord with the PPG and ensure consistency and integration across its strategic policies.** This should accord with the NPPF, which confirms that a strategy – including a housing requirement – which either fails to promote sustainable patterns of growth or severely restricts economic growth would form neither a positive, nor justified, nor effective, nor national policy consistent approach.

1. Introduction

1.1 This report has been prepared by Turley on behalf of Peel Investments (North) Limited (hereafter referred to as 'Peel') in response to the St Helens Submission Draft Local Plan 2020-3035 (PSLP) which was published for consultation in January 2019. It is one of three papers which collectively comprise Peel's submission to the PSLP. The full suite of papers is as follows:

- Paper 1: Overarching representation
- Paper 2: Assessment of housing needs (this paper)
- Paper 3: Assessment of housing land supply

1.2 The report sets out Peel's representations to the approach taken by St Helens Council ('the Council') in establishing its proposed housing requirement within the PSLP, providing specific comments on the requirements set out in 'Policy LPA05', and the informing evidence base, in the context of their land interests at Haydock.

Context

1.3 The proposed annual housing requirement has reduced from 570 dwellings per annum (dpa) in the Preferred Options Local Plan (POLP) to 486dpa in the PSLP – a reduction of c.15%. This equates to a total cumulative requirement for 9,234 dwellings over the plan period (2016 to 2035), reduced from 10,830 dwellings in the POLP.

1.4 In arriving at the new housing requirement the Council has correctly started by using the output of the standard method. It has then, in accordance with Planning Practice Guidance (PPG), identified a number of circumstances where it is likely that the *'actual housing need is higher than the standard method indicates'*⁵.

1.5 Specifically, the Council has identified that it *'does not take into account the increased employment growth that is likely to result from the development of the sites that are allocated for employment development'*⁶. These sites are integral to delivering the Council's growth strategy, which underpins the strategic policies of the PSLP. It is also noted that the Council recognises further justification for going beyond the standard method, acknowledging an *'upward pressure'* on the standard method figure on the basis of a long-term worsening of affordability⁷.

1.6 The PPG makes clear that where such circumstances are acknowledged, the impact on housing need will *'need to be assessed'* before the identified need is then subsequently translated into a housing requirement⁸.

1.7 In arriving at the assessment of housing need and the associated requirement, the PSLP relies on two updates to its evidence base, namely:

⁵ PPG Reference ID 2a-010-20190220

⁶ St Helens Council (January 2019) St Helens Borough Local Plan 2020-2035 Submission Draft, paragraph 4.18.5

⁷ *Ibid*, paragraph 4.18.5

⁸ PPG Reference ID 2a-010-20190220

- The St Helens Strategic Housing Market Assessment Update⁹ ('the SHMA Update'), published in January 2019; and
 - The Employment Land Needs Study Addendum Report¹⁰ ('the ELNS Addendum'), originally published in October 2017 but 'amended' in January 2019.
- 1.8 The SHMA Update presents '*a range of annual housing needs figures*', without concluding on the suitability of any single figure. The Council has derived its proposed housing requirement by selecting '*the scenario that is considered to be the most realistic*', which links with the ELNS Addendum and suggests that 486 dwellings per annum are needed¹¹.
- 1.9 This concluded level of need represents an elevation from the output of the standard method for St Helens (468dpa), albeit only by a modest 18 dwellings per annum or 4%. The Council implies that this modest increase will support its growth strategy, and alleviate potential affordability pressures.
- 1.10 Peel welcomes the view expressed by the Council in the PSLP that there would be disadvantages in relying only on the standard method. Furthermore, Peel strongly supports the principle of identifying the housing needed to align with the Council's commitment to economic growth, with this ambition key to the PSLP.
- 1.11 Peel is, however, concerned that the concluded calculation of need does not adequately or fully recognise the housing needed in St Helens over the plan period. As detailed through this technical report, this is because:
- The concluded scale of employment growth forecast is considered to underestimate the full potential of the St Helens economy, as supported by the strategy of the PSLP;
 - The methodology used to identify the associated scale of housing provision needed to support the growth of the local economy applies a number of unsubstantiated and unjustified assumptions, which result in the need for housing being underestimated;
 - Recent rates of annual delivery have by some way exceeded the annual average housing need calculated. In line with the PPG, such significant disparity should be taken into account¹²;
 - The outcome of the standard method is significantly lower than that which has been identified in a recently published sub-regional assessment of housing need as being required to support an economic growth strategy in the borough. It is also of note that the proposed housing requirement is lower than the current adopted plan target, and that included in earlier iterations of the emerging Local Plan; and

⁹ GL Hearn (January 2019) St Helens SHMA Update

¹⁰ BE Group (January 2019) Employment Land Needs Study Addendum Report, amended

¹¹ St Helens Council (January 2019) St Helens Borough Local Plan 2020-2035 Submission Draft, paragraph 4.18.8

¹² PPG Reference ID 2a-010-20190220

- There would evidently be considerable benefits in delivering a greater proportion of the need for affordable housing through a higher housing requirement. This has not been adequately considered or evidenced.

Report Structure

1.12 This report is structured as follows:

- **Section 2 – An Updated National Policy Context.** An overview of the requirements of the National Planning Policy Framework (NPPF) and PPG for calculating a local housing need and translating it into a housing requirement.
- **Section 3 – The Council’s Proposed Policy Approach.** A concise review of the policy approach proposed in the PSLP, and its underlying evidence base considered in the context of NPPF and PPG.
- **Section 4 – Planning for Economic Growth in St Helens.** Recognising the growth strategy which underpins the strategic policies within the PSLP, this section considers the evidence informing the strategy and the extent to which this presents a justified consideration of the full economic potential of the borough. The related implications for an assessment of housing need which aligns with the growth strategy is set out and compared with the Council’s published evidence.
- **Section 5 – A Strong Housing Delivery Context.** In accordance with the PPG, consideration is given to previous levels of housing delivery in St Helens, recognising that recent rates of delivery have exceeded the scale of need calculated under the standard method.
- **Section 6 – A Review of the Previous Assessments of Housing Need.** The Council’s most recent calculation of local housing need has been preceded by a number of assessments conducted at a local and sub-regional level. The extent to which variant levels of housing need have been concluded historically in St Helens is established.
- **Section 7 – The Implications of Addressing Affordable Housing Need.** The Council’s evidence confirms that there is a significant need for affordable housing in the borough. In accordance with PPG, the implications for the setting of an appropriate and justified housing requirement are considered.
- **Section 8 – Summary and Conclusions.** The key conclusions from each of the above sections are drawn together and the implications for the soundness of the proposed housing policy in the PSLP set out.

2. An Updated National Policy Context

The National Planning Policy Framework

- 2.1 National planning policy is a vital mechanism for growth and the rebalancing of the economy to ensure that growth serves to *'build a country that works for everyone'*¹³.
- 2.2 The publication of the revised NPPF in July 2018 represents an important change in the informing policy context for the preparation of the St Helens Local Plan. It is noted that the Secretary of State issued changes¹⁴ to the NPPF on 19 February 2019¹⁵, after the publication of the PSLP, with updates made to the PPG on the following day. It is within this context that these representations have been prepared.
- 2.3 The NPPF retains at its core the Government's commitment to ensuring that the planning system achieves the parallel objectives of delivering the homes that are needed, supporting the ongoing development of a strong, responsive and competitive economy and making effective use of land to enhance the natural environment¹⁶.
- 2.1 National policy and guidance provides a clear framework for doing so. The implications for the PSLP are summarised as follows:
- The PSLP must include *'strategic policies'*¹⁷ to address the identified priorities for the development and use of land across St Helens. These policies and priorities must address social, economic and environmental objectives in *'mutually supportive ways'*, mindful that they are interdependent components of achieving sustainable development¹⁸;
 - In respect of social objectives, the strategic policies of the GMSF must *'make sufficient provision for: a) housing (including affordable housing)'*¹⁹. This should be achieved by ensuring that a *'sufficient amount and variety of land'* is made available²⁰;
 - The minimum amount of new homes needed across St Helens should be identified using the Government's *'standard method'*²¹, the methodology for which is set out in the national PPG.
 - The *'standard method'* identifies the *'minimum starting point'* in determining housing needs and there will be circumstances where the *'actual housing need is higher than the standard method indicates'*²². The PPG makes clear that this will

¹³ Cabinet Office (2017) 'Building a country that works for everyone: the government's plan' – series of departmental plans

¹⁴ Planning update: Written statement – HLWS1309

¹⁵ MHCLG (February 2019) National Planning Policy Framework

¹⁶ *Ibid*, paragraph 8

¹⁷ *Ibid*, paragraph 17

¹⁸ *Ibid*, paragraph 8

¹⁹ *Ibid*, paragraph 20

²⁰ *Ibid*, paragraph 59

²¹ *Ibid*, paragraph 60

²² PPG Reference ID 2a-010-20190220

'need to be assessed' before the identified need is translated into a housing requirement figure in the PSLP²³.

- 2.2 The NPPF confirms that a strategy which either fails to promote sustainable patterns of growth²⁴ or severely restricts economic growth²⁵ would form neither a positive, nor justified, nor effective, nor national policy consistent approach. It would therefore be unsound²⁶.

Calculating Local Housing Need

- 2.3 As referenced above, paragraph 60 of the NPPF states that strategic policies on housing should be informed by the outcome of the standard method in determining the minimum number of homes needed.

- 2.4 It is important to recognise, as the Government has been clear to state, that the calculation of need through the standard method '*does not represent a mandatory target for local authorities to plan for, but the starting point for the planning process*'²⁷.

- 2.5 This clearly does not prohibit authorities from planning for levels of housing which exceed this 'minimum' benchmark, or progressing additional evidence to calculate need. Indeed the Government has been clear to articulate its expectation that authorities do just that, and it is acknowledged that the output of the standard method will not in isolation deliver the 300,000 homes it has confirmed as being needed to be delivered by the mid-2020s to avert the current housing crisis. The Secretary of State for Housing has confirmed that:

*"The standard method is intended to provide what we believe is a realistic starting point for assessing the number of homes needed for each area. ...that is not a target. That is your starting point... It relies on past trends, so does not account for changing circumstances, for example new infrastructure. **Where growth is expected beyond historic trends authorities are encouraged to establish higher lead figures.** ...All we are saying is that it is a methodology. It is a starting point for councils to use as part of their need and supply policies"*²⁸ (emphasis added).

- 2.6 In responding to a question which directly challenged the limitations of the methodology – with regards to a concern that there will be a 'battle' at Local Plan examinations in the North, when variant housing requirement figures are often justified and intended to reflect the aspirations of northern areas – the Secretary of State was clear to respond that:

*"I very firmly hear that aspiration and that intent. That is something I certainly do not want to discourage at all. I would underline that the methodology is based on historic trends, which simply show more growth in the south than the north. **I would underline***

²³ *Ibid*

²⁴ MHCLG (February 2019) National Planning Policy Framework, paragraphs 20 and 103

²⁵ *Ibid*, paragraphs 20 and 80

²⁶ NPPF 35.

²⁷ MHCLG (2019) 'Government response to the technical consultation on updates to national planning policy and guidance – A summary of consultation responses and the Government's view on the way forward', February 2019, page 6

²⁸ Housing, Communities and Local Government Committee oral evidence: MHCLG priorities for the Secretary of State, HC 1036 – Rt Hon James Brokenshire MP, Secretary of State, Ministry of Housing response to Question 32

that the standard method is a minimum, not a maximum, and there is absolutely nothing to stop local authorities planning for growth...Authorities can certainly plan for growth in their numbers and their ambition, and that is something I firmly encourage.²⁹

- 2.7 The updated PPG translates this support for plan-makers in planning for an appropriate level of new housing provision. It is clear to state that the standard method *'does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour'*³⁰. As referenced above, it is clear to identify that there will therefore be circumstances where *'actual housing need is higher than the standard method indicates'*.
- 2.8 The PPG identifies a series of potential circumstances which would lead to situations where the need for housing would be expected to exceed past trends, because of:
- Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
 - Strategic level infrastructure improvements that are likely to drive an increase in the homes needed locally; or
 - An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.
- 2.9 Within the same sub-section of the guidance, two further *'situations'* need to be considered when determining the appropriateness of planning for a higher level of housing need than the standard model suggests. These are where either of the following are significantly greater than the outcome of the standard method:
- Previous levels of housing delivery; and
 - A previous assessment of need (such as a recently-produced Strategic Housing Market Assessment).

Future revisions to the standard method calculation

- 2.10 In the context of the ongoing development of the Local Plan, it is also important to acknowledge that the Government has committed to reviewing the standard method in the next 18 months.
- 2.11 It is not clear as to whether outputs of this review will be released in the short-term, but it is understood that the review is intended to respond to acknowledged limitations of the method in its current form, not least the extent to which it falls short of fully aligning with the Government's aspirations for the housing market which includes the commitment to deliver 300,000 homes per annum.

²⁹ *Ibid* - Response to Questions 35 and 36

³⁰ PPG Reference ID 2a-010-20190220

- 2.12 The commitment to review also responds to direct criticism of the method by the National Audit Office (NAO) as set out in a report published in February 2019 auditing the Government's approach to planning for new homes. This criticism included an identification of the fact that for large parts of the country, primarily the North and Midlands, it reduces the calculation of the number of homes needed below those previously assessed. The significant limitation of the method in this regard is then highlighted, with the NAO confirming that *'this reduction could hamper local authorities' plans to regenerate and stimulate economic growth'*³¹.
- 2.13 Where such criticisms and limitations are taken into account, it is reasonable to assume that the review will lead to a method which provides a more balanced assessment of need. This would strongly suggest a direction of travel whereby the outcome of the standard method is elevated in areas such as the North and Midlands, where it is currently thought to underestimate needs.

Summary

- 2.14 The NPPF and PPG have evidently established a new context for identifying an appropriate local housing need as part of establishing sound planning policies.
- 2.15 The NPPF is clear in its requirement for Councils to use the standard method figure as a starting point. Where circumstances are identified which will have implications on demographic behaviour, and suggest a higher level of need, the PPG is clear in confirming that Councils will need to assess this.
- 2.16 The PPG identifies a number of circumstances which it suggests would result in an increase in housing need beyond past trends. This includes the pursuit of a growth strategy in an area that is considered likely to be deliverable, and the agreement to take unmet need from neighbouring authorities. Other circumstances include where previous housing delivery or assessments of housing need suggest a significantly greater level of need.
- 2.17 The extent to which these circumstances are applicable in St Helens and the evidence used by the Council to assess the impact on housing need forms the basis of the remaining sections of this report.
- 2.18 Whilst it is recognised that it is the Council's intention to submit the Local Plan for examination in the short term, it is important to recognise that the Government has committed to a review of the standard method calculation to address limitations. This includes a recognition that as a starting point it has resulted in a lowering of the calculated assessment of need across large parts of the North and Midlands. This provides an important context for the Council in ensuring that its approach is sufficiently flexible to respond to potential changes in this regard.

³¹ National Audit Office (2019) Planning for new homes, paragraph 1.22

3. The Council's Proposed Policy Approach for Housing

- 3.1 This section establishes the technical basis of the Council's proposed housing requirement, considering its relationship with the evidence base and the wider strategy proposed in the PSLP.

A Strategy for Growth

- 3.2 The PSLP's strategic planning policies stem from a principle strategic aim for 'Supporting Regeneration and Balanced Growth'. This is supported by a strategic objective 'to promote regeneration by enabling steady and sustainable economic and population growth'.
- 3.3 Figure 3.1, replicated below, illustrates the supporting strands of the PSLP's policies to support this overall growth strategy. It is of note that this includes but is not limited to 'meeting housing needs' and 'ensuring a strong and sustainable economy'.

Figure 3.1: PSLP diagram of Interrelationship of Vision, Aims and Objectives



Source: Replicated Figure 3.1 of the PSLP, St Helens Council, 2019

- 3.4 It is apparent that the Council has advanced a strategy of growth within the PSLP with this underpinning each of the strategic policies. Specific focus in this regard is placed on the approach taken to plan for the provision of additional employment land to accommodate strong market and demand.
- 3.5 The demand for the identified strategic employment sites is recognised as being based on locally derived needs reflecting historic take-up and market evidence but also the

role that St Helens will play in accommodating need for employment across the wider Liverpool City Region.

- 3.6 The PSLP principally focuses in this context on an acknowledged sub-regional need to accommodate the growth of the logistics and warehousing sector, as set out at paragraph 4.6.2. The PSLP recognises St Helens' role in accommodating the 'unmet need' arising within the sub-region, at paragraph 4.6.5. This is also reflected by a proposition in the PSLP to accommodate a proportion of Warrington's employment land need on the Omega South West site within St Helens.
- 3.7 Evidently, whilst this is not an unmet need for housing, the accommodation of unmet employment needs will have an impact on the local housing market and the demography of the borough beyond that expected as a result of past trends. This forms an important context for the approach taken to assess housing needs and in arriving at a sound housing requirement.

Calculating the Local Housing Need

- 3.8 Section 2 established the process through which an authority is required to calculate its housing need. In our view, the Council has broadly adopted an approach which is compliant with the latest iteration of the NPPF and PPG, with the approach summarised below.

Outcome of the standard method

- 3.9 The NPPF requires use of the 'standard method' as a starting point to 'determine the minimum number of homes needed'³².
- 3.10 Within the PSLP, the Council confirms that an up-to-date application of the standard method generates a minimum need for 468 dwellings per annum. The baseline for the presented calculation is the 2014-based household projections, in line with the approach proposed by Government³³ in autumn 2018 and since formally reflected in the updated PPG³⁴. This baseline is adjusted based on the latest affordability ratio, as summarised in the table below.

Table 3.1: Applying the Standard Method in St Helens

	Dwellings per annum
Baseline (2014-based projections; 2019-29)	425.4*
Affordability ratio	5.59
Affordability adjustment	9.9375%
Minimum local housing need	468

Source: ONS; MHCLG

* unrounded figure used in Council calculation

³² MHCLG (February 2019) National Planning Policy Framework, paragraph 60

³³ MHCLG (October 2018) Technical consultation on updates to national planning policy and guidance

³⁴ PPG Reference ID 2a-005-20190220

The Local Housing Need Evidence Base

- 3.11 Recognising that the standard method provides only a '*minimum*' figure and that the PSPLP's strategic policies are based around a strategy of growth, the Council commissioned an update to its Strategic Housing Market Assessment to fully reflect the new national policy context and consider the '*housing needed to support the potential growth in the borough's workforce at proposed major employment sites*'³⁵. The SHMA Update was published in January 2019 as part of the ongoing consultation on the PSPLP.
- 3.12 As highlighted in the introduction to this report, the SHMA Update presents a range of demographic and economic-led scenarios, without endorsing a single figure. The demographic scenarios imply a lower need than the '*minimum*' figure generated through the standard method, and are correctly attributed no weight. All economic-led scenarios, however, suggest *higher* levels of housing need in St Helens, ranging from 459 to 514 dwellings per annum over the assessment period (2016 – 2033).
- 3.13 These scenarios draw upon modelling presented in the ELNS Addendum³⁶, which estimates:
- The gross number of full time equivalent (FTE) jobs that could be accommodated across the borough's portfolio of 13 proposed employment sites, drawing upon '*several pieces of evidence*'. This totals circa 14,167 FTE jobs³⁷;
 - The extent to which these jobs will be new to the area, or displaced. Different displacement levels are assumed for different B class uses and, in the case of one site, its specific nature (Parkside). These allowances produce a residual net estimate of around 9,300 FTE jobs³⁸;
 - The trajectory of employment growth on each site, in order to estimate net jobs created to 2033 (the end of the period assessed in the SHMA Update) and beyond to 2048. This builds upon the calculations summarised above, albeit the variant phasing of individual sites means that the precise totals are not achieved in any single year. Three scenarios are modelled, to reflect:
 - Scenario 1: Development as soon as possible (scenario 1), which would see 9,122 net additional jobs created by 2033;
 - Scenario 2: The prioritisation of sites to allow for limits on market demand and construction capacity (scenario 2), which assumes a '*smoother take-up*' and would lead to 7,380 net additional jobs created by 2033; and
 - Scenario 3: The prioritisation of sites as above, but additionally factoring in further constraints around Junction 23 at Haydock (scenario 3). The longer lead-in times under this scenario would lead to the creation of 6,078 net additional jobs by 2033.

³⁵ GL Hearn (January 2019) St Helens SHMA Update, paragraph 1.26

³⁶ BE Group (January 2019) Employment Land Needs Study Addendum Report, amended

³⁷ *Ibid*, Table 8 (p15)

³⁸ *Ibid*, paragraph 3.7

- 3.14 The ELNS Addendum “prefers” scenarios 2 and 3, stating that these are ‘*the most likely for St Helens*’ and the most proportionate to past levels of take-up³⁹. The ELNS Addendum does not rule out scenario 1.
- 3.15 Nonetheless, scenario 1 is not integrated in any of the analysis within the SHMA Update, which directly references the outputs of scenarios 2 and 3 alongside forecast growth in non-B class employment. The latter draws upon an Oxford Economics forecast from the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA), and additionally accounts for the multiplier effects of employment on B class sites (i.e. non-B jobs created as a direct or indirect result of B jobs).
- 3.16 The calculated concluded job growth in St Helens under scenarios 2 and 3 is shown at Table 4 of the SHMA Update for the period from 2016 to 2033. It is noted that the cumulative sum of B-Class and Non-B class jobs is not presented, but this is summed in Table 3.2 below.

Table 3.2: Jobs Growth, St Helens 2016-33

Jobs	Source	Scenario 2	Scenario 3
B Class Jobs	ELNA	7,380	6,078
Non-B Class Jobs	SHELMA	4,587	4,311
Total		11,967	10,389

Source: Adapted from Table 4 of the 2019 SHMA Update

- 3.17 The SHMA Update subsequently makes allowance for commuting to estimate the resident workforce needed to fill jobs created in the borough, under scenarios 2 and 3. A variant approach is taken, such that:
- A Census-derived borough-wide commuting ratio (1.21) is applied to the non-B class jobs, allowing for ‘*a considerable level of out-commuting*’; and
 - Analysis on the ‘*potential worker origin*’ from the ELNS Addendum is referenced for B class jobs, which breaks down the trajectory of *net* employment to identify workers residing in St Helens or elsewhere⁴⁰. Circa 40% of net additional jobs created by 2033 are ultimately assumed to be taken by St Helens residents, as a result of various assumptions⁴¹.
- 3.18 After a modest adjustment to allow for people holding more than one job (‘double jobbing’), the resultant job growth figures (8,272 jobs under scenario 2; 7,415 jobs under scenario 3) form the basis for the modelling presented within the SHMA Update, which derives economic activity rate assumptions from Oxford Economics forecasts. A

³⁹ *Ibid*, paragraphs 4.15 and 5.29

⁴⁰ *Ibid*, Table 15 (p37-38)

⁴¹ *Ibid*, paragraph 5.19

need for between **479 and 514 dwellings per annum** is suggested through such an approach, over the period from 2016 to 2033⁴².

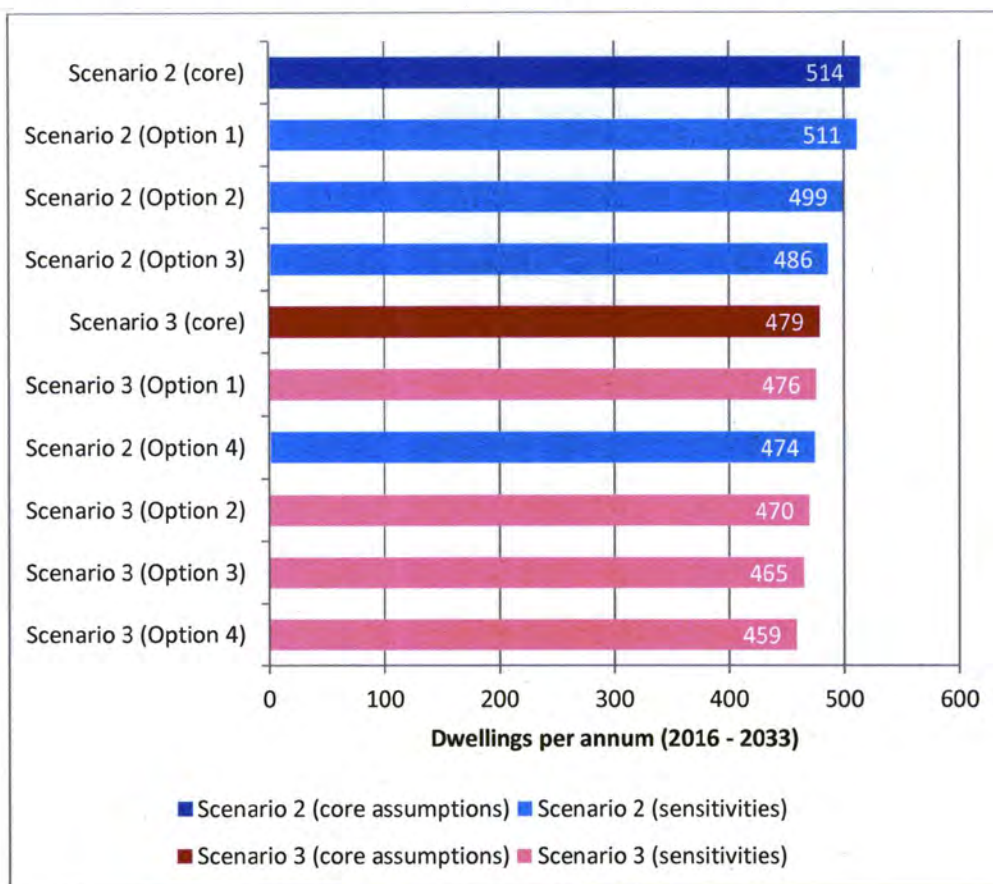
- 3.19 Four further sensitivity scenarios are subsequently introduced, to allow for sites which '*do not come forward for different reasons*'⁴³. These options appear to originate from the ELNS Addendum⁴⁴, and:
- Remove Omega South (Option 1);
 - Remove Omega South and land at Millfield Lane and Liverpool Road, Haydock (2);
 - Remove Omega South and land north east of Junction 23 of the M6, at Haydock (3); and
 - Remove all three of the above sites (4).
- 3.20 The sensitivities produce residual growth of 7,486-8,417 jobs under scenario 2, and 7,114-7,537 jobs under scenario 3. Although the SHMA Update suggests that these figures can be compared to Table 4 (which presents *total* jobs growth, with no adjustment for commuting), the title suggests that these figures are actually estimates of the '*number of jobs filled by residents of St Helens*'. This implies that these figures actually adjust for commuting, and as such should be compared to Table 5.
- 3.21 Notwithstanding, the SHMA Update applies '*the same methodology as the main analysis*' – ultimately appearing to capture all of the above adjustments – to produce unspecified figures that form the basis for further demographic modelling. These sensitivities provide a comparatively narrow range and suggest a need for between **459 and 511 dwellings per annum**. This is shown in the following chart, which also shows the original scenarios prior to the development of sensitivities (479-514dpa).

⁴² GL Hearn (January 2019) St Helens SHMA Update, Table 7

⁴³ *Ibid*, paragraph 4.17

⁴⁴ It appears that the figures presented at Table 16 of the ELNS Addendum are substituted to replace the "B class jobs" row at Table 5 of the SHMA Update. The non-B class jobs row is unchanged

Figure 3.2: Economic-led Scenarios in SHMA Update (2016 – 2033)



Source: GL Hearn, 2019

The proposed housing requirement

- 3.22 Drawing upon the findings of the SHMA Update, the PSLP directly acknowledges that ‘employment growth is likely to lead to increased housing need’⁴⁵. The Council clearly notes its presentation of ‘a range of annual housing needs figures’, but states that:

*“...the scenario that is considered to be the most realistic gives rise to a figure of **486 net new dwelling completions per annum**”⁴⁶ (emphasis added)*

- 3.23 A footnote in the PSLP confirms that this figure is derived from **scenario 2** (smoother take-up with prioritisation of key sites) and **sensitivity option 3** which discounts circa 700 B class jobs at Omega South and land north east of Junction 23 at Haydock. No further justification for this decision is presented within the PSLP, or in the conclusions of the supporting studies.
- 3.24 It is this scale of assessed housing need which is taken forward into the proposed housing requirement, with the PSLP stating that:

⁴⁵ St Helens Council (January 2019) St Helens Borough Local Plan 2020-2035 Submission Draft, paragraph 4.18.5

⁴⁶ *Ibid*, paragraph 4.18.8

"...the borough does not need to accommodate any housing needs arising in any neighbouring local authority area, and...no neighbouring local authority has capacity within their urban area(s) to accommodate any of the housing needs arising in St Helens Borough...no constraints have been identified that prevent the OAN from being met in full in the Borough..."⁴⁷

Summary

- 3.25 The PSLP's strategic policies are underpinned by a strategic objective to support regeneration and deliver balanced growth.
- 3.26 In accordance with the NPPF and the PPG, the PSLP presents the outcome of the standard method as the starting point for assessing the housing need in the borough.
- 3.27 The Council has then correctly identified that this minimum need will not accommodate its strategy for growth, with specific reference to a failure to adequately support its strategic employment land policies. It recognises that the delivery of the employment land identified within the PSLP will create a situation whereby the growth in jobs will have an impact on demographic growth, as evidenced within its housing need evidence base.
- 3.28 The outcome is the Council's decision to plan for an actual level of housing need which falls within the range identified in its evidence base, and is higher than the standard method. This concluded need is, however, only 18 homes per annum higher than the standard method. It is noted that the selected figure is considerably lower than that which was included in the Local Plan during the previous round of consultation.
- 3.29 The extent to which the Council's assessment is appropriate and justified in supporting the modest scale of this uplift is considered within the remaining sections of this report.

⁴⁷ *Ibid*, paragraph 4.18.9

4. Planning for Economic Growth in St Helens

- 4.1 The PSLP establishes a strong strategy to support regeneration and deliver balanced growth. This is underpinned by a commitment to support the delivery of new employment land across the borough, in turn facilitating a growth in the local economy. It is recognised that this growth reflects both local demand and the approach taken by the Council to accommodate unmet employment land needs from across the City-Region, generated by the logistics sector in particular.
- 4.2 This approach is strongly supported, and is considered to align with the Government's own national agenda and the NPPF's policies relating to build a strong competitive economy.
- 4.3 As the analysis in this section identifies, however, Peel is concerned that the full employment potential associated with realising the growth strategy and providing for the employment land to respond to demand is being underestimated. Equally, we have concerns about the methodology used within the SHMA Update to explore the scale of housing provision required to support anticipated employment growth, associated with the delivery of the economic strategy.
- 4.4 We conclude that a more pronounced uplift to the standard method is appropriate and necessary to ensure that the strategic policies within the PSLP are supported and integrated, as required by the NPPF.

National Context for Economic Growth

- 4.5 The Government is cognisant of the risks facing the national economy at a time of comparatively weak growth and economic uncertainty. It has anticipated this by publishing its Industrial Strategy and by expressing its financial support for initiatives like the Northern Powerhouse and Midlands Engine. The Northern Powerhouse Independent Economic Review (NPIER) highlighted the important relationship between attracting and retaining a skilled population in the North, demonstrating that population growth beyond '*business as usual*' will be required to achieve '*transformational*' growth in the North⁴⁸.
- 4.6 The Government's commitment to the Northern Powerhouse and '*addressing the key barriers to productivity that the region faces*' was reaffirmed in the 2016 Autumn Statement⁴⁹ and more recently in the 2018 Budget, where the Chancellor confirmed that '*today we go further to fire-up the Northern Powerhouse, fuel the Midlands Engine and back our regions across the UK*'⁵⁰. Its Northern Powerhouse Strategy sets out a clear vision to '*unleash the full potential of the North*' and '*successfully tackle the barriers constraining the North's economy*'⁵¹.

⁴⁸ SQW and Cambridge Econometrics (2016) The Northern Powerhouse Independent Economic Review, final executive summary report

⁴⁹ HM Treasury (2016) Autumn Statement, paragraph 3.51

⁵⁰ <https://www.gov.uk/government/speeches/budget-2018-philip-hammonds-speech>

⁵¹ HM Government (2016) Northern Powerhouse Strategy

- 4.7 In support of this, the Government is committing unprecedented levels of investment in infrastructure to create a network of better connected and self-sustaining Northern cities, which will act as an economic counterweight to London. It is devolving the so-called “levers of growth” to combined authorities under directly elected Mayors, and providing cities with the tools to deliver growth through key investments which include:
- £13bn on transport in the North up to 2020;
 - £150m to support the rollout of smart and integrated ticketing across the North;
 - £161m to accelerate the transformation of the M62 into a smart motorway;
 - £3.3bn to LEPs for investment in local infrastructure projects; and
 - £60m development funding for Northern Powerhouse Rail.
- 4.8 Section 6 of the NPPF *‘Building a strong, competitive economy’* articulates how planning must *‘help create the conditions in which businesses can invest, expand and adapt’*⁵².
- 4.9 At paragraph 80, the Government is clear to stress that in plan-making and decision taking the *‘approach taken should allow each area to **build on its strengths, counter any weaknesses and address the challenges of the future**’* (emphasis added).
- 4.10 In the context of plan-making and the development of responsive planning policies, paragraph 81 confirms the importance of establishing a clear economic vision and strategy supported by the establishment for criteria for local and inward investment to match the strategy and meet anticipated needs. Importantly this recognises the need to *‘address potential barriers to investment, such as **inadequate infrastructure, services or housing**’, whilst being ‘flexible enough to accommodate needs not anticipated in the plan...and to enable a rapid response to changes in economic circumstances’*.
- 4.11 In establishing the policy framework to realise the *‘Government’s objective of significantly boosting the supply of homes’*, the NPPF is clear to stress – in translating need into the provision of new homes – the importance of ensuring that plan-making delivers a *‘sufficient amount and variety of land’*⁵³.
- 4.12 A failure to provide the land to accommodate the homes needed to support planned and anticipated investment will have significant implications. It risks constraining growth of businesses and the local economy, and causing further adverse consequences with regards to the sustainability of growth including additional pressure and an overheating of the local housing market.

⁵² MHCLG (2019) National Planning Policy Framework, paragraph 80

⁵³ *Ibid*, paragraph 59

An Ambitious and Deliverable Local Economic Growth Strategy

- 4.13 It is important to consider St Helens' growth strategy in the context of the growth plans for the wider City Region, as referenced in the PSLP itself.

- 4.14 The PSLP is clear in this context to state that:

"St Helens Borough's economy is inextricably linked to that of the wider Liverpool City Region. The Council will continue to work alongside its City Region partners to take full advantage of the continued growth of the City Region and to help deliver the economic growth, job creation, and skills development aspirations outlined in the Liverpool City Region Growth Strategy (2016) and Strategic Economic Plan (2016)"⁵⁴

- 4.15 As established through the City Region's Statement of Cooperation on Local Planning, the Liverpool City Region represents one of two major metropolitan areas in the North West of England. It has a critical role in contributing on this basis to realising the Government objectives for a rebalancing of the national economy

- 4.16 In November 2015, the Government signed a Devolution Agreement with St Helens, the five other Merseyside authorities and the Liverpool City Region LEP. The agreement includes the creation of a new office for a directly elected Liverpool City Region Mayor. The Mayor has:

"Powers over strategic planning, including the responsibility to create a Single Statutory City Region Framework, a Mayoral Development Corporation and to develop with government a Land Commission and a Joint Assets Board for economic assets"⁵⁵

- 4.17 The Devolution Agreement included a commitment to 'the identification of key economic sites for Housing and for Employment, at the City Region level, by 2017 to support a Mayoral Development Corporation approach'.

- 4.18 It is also of note that the Devolution Deal back in 2015 identified the economic role and potential of the City Region and the importance of the strategic employment sites, including those in St Helens:

"Liverpool City Region has the opportunity, through devolution, to ensure it is at the heart of the Northern Powerhouse. With the River Mersey and the integrated cluster of logistics and expertise through Superport, the Liverpool City Region has unique economic assets that can help transform the Northern economy. In its growth plan, the City Region has a network of key strategic sites to driver forward business growth and commercial investments including 3MG in Halton, Knowsley Industrial Park, Atlantic Park in Sefton, Parkside in St Helens, Wirral Waters and Stonebridge Cross in Liverpool"⁵⁶

- 4.19 A further top-up package to the Devolution Deal was agreed in March 2016. This represents the greater responsibility for a range of powers and an expectation of additionality associated with supported investment.

⁵⁴ St Helens Council (January 2019) St Helens Borough Local Plan 2020-2035 Submission Draft, paragraph 4.12.3

⁵⁵ Liverpool City Region Devolution Agreement, HM Treasury / Liverpool City Region, November 2015

⁵⁶ *Ibid*

- 4.20 The Growth Strategy⁵⁷ for the Liverpool City Region sets out the scale of opportunity presented by the Devolution Deal. It asserts:

"Devolution provides us with an unprecedented opportunity to take control of our economic future, to build on recent success and to address the challenges before us"

- 4.21 The Strategy confirms the intention to ensure 'the creation of over 100,000 additional jobs in the Liverpool City Region by 2040'. It recognises that this growth will build upon a period of 'economic renaissance with a diversifying economy of internationally-oriented markets and businesses'. It also recognises that:

"Major investments in property, transport and energy assets are transforming the City Region"

- 4.22 In total, the City Region has secured £336m of Growth Deal funding from Government. This has been secured in the first three Growth Deal rounds which have run between 2014 and 2017.

- 4.23 Through the Devolution Deal, the Combined Authority will have control over the Liverpool City Region Single Investment Fund (SIF) which is the key funding tool for promoting economic growth for the LCR. The City Region has confirmed that to date it has received 78 applications with a total value of over £270m. The Combined Authority has to date approved 32 projects to go forward. The SHELMA highlighted that the SIF is intended to unlock economic potential of the Mersey and Superport and maximise opportunities from the High Speed 2 rail line⁵⁸ (HS2). This will be an important enabler in achieving elevated levels of job growth.

- 4.24 Whilst the above highlights sub-regional confidence in the delivery of a wider Growth Strategy, including the reward of funding, it is important to recognise that the growth strategy for St Helens is principally predicated upon the successful delivery of the employment sites accommodated through the Local Plan to deliver jobs and attract investment.

- 4.25 The demand for employment land in St Helens has been very strong, reflecting the current strength of the market. The warehousing and logistics market specifically is identified within the Council's evidence base as demonstrating particularly strong performance and take-up in St Helens and across the wider sub-region⁵⁹.

- 4.26 The Council's ELNS Addendum confirms the strength of demand, albeit it also recognises that the take-up of B8 space has more recently reduced as a result of a shortage of appropriate land⁶⁰. This report expresses confidence in the capacity and demand for the land identified to be taken-up and occupied over the plan period.

⁵⁷ Liverpool City Region Growth Strategy, 2016

⁵⁸ GL Hearn (2018) Liverpool City Region Strategic Housing & Employment Land Market Assessment (SHELMA), Final Report, paragraph 2.11

⁵⁹ BE Group (2019) Employment Land Needs Study – Addendum Report, paragraph 2.18(1)

⁶⁰ *Ibid*, paragraph 2.19

4.27 This confidence is also supported by market evidence assembled by CBRE on behalf of Peel Logistics in February 2019⁶¹. This confirms that:

- Current demand for Grade A/ New distribution accommodation in the North West continues to grow, however, supply of Grade A supply stands at only 12 months supply;
- Demand from occupiers for 300,000 sq.ft plus Design & Build schemes has increased over the past few years with key deals including Movianto, Haydock (370,000 sq.ft), Amazon, Haydock (360,000 sq.ft) examples of this demand; and
- The continuing rise of e-commerce demand will drive take-up of increased distribution units throughout the UK.

4.28 In summary, there is strong evidence which provides confidence in the deliverability of the growth strategy being pursued by St Helens Council in the PSLP. This is supported by a commitment to deliver growth across the City Region, backed by the reward of funding to enable delivery, with St Helens playing a key role in accommodating growth of the employment base in the warehousing and logistics sector.

4.29 Equally, in terms of a confidence in the capacity to accommodate additional demand in those economic sectors targeted through the approach to providing land, it is clear that this is supported by strong market evidence of unmet need and demand. This is recognised in the Council's own evidence base and used to justify the growth strategy underpinning the strategic policies proposed through the PSLP.

The Forecasting of Associated Job Growth

4.30 As set out in section 3, the ELNS Addendum and the SHMA Update collectively seek to present an evidence base on the scale of job growth which is identified as being likely to occur through the proposed employment land allocations and the wider growth of the economy as a whole.

4.31 These evidence base documents suggest that between 10,389 (scenario 3) and 11,967 (scenario 2) jobs will be created in St Helens over the period from 2016 to 2033, according to Table 4 of the SHMA Update. These represent a combination of B Class jobs and Non-B Class jobs. It is important to note that the ELNS Addendum does not conclusively dismiss the potential for higher levels of job growth to be created, based on consistent assumptions under its scenario 1 scenario.

4.32 In deriving these estimates of job growth, a number of assumptions are applied, particularly in deriving the scale of employment which could reasonably be expected to be created through the development of the portfolio of employment sites.

4.33 AMION Consulting ('AMION') has undertaken a detailed review of the modelling and analysis presented in both of the Council's evidence-based reports. The findings of this critique are included at Appendix 1 to this report.

⁶¹ This is included as an Appendix to the 'Technical review of the Employment Land OAN' submitted as part of these representations.

4.34 AMION concludes that there are a number of assumptions within the modelling which are not adequately justified or substantiated by the evidence presented. These include assumptions regarding:

- **Employment levels at key employment sites.** Specifically, concerns are noted with regards to the decision to depart from industry standard assumptions, and prefer a range of alternative but inadequately justified data sources. Whilst it is agreed that the use of local evidence can add robustness, AMION has identified a number of instances where *higher* levels of job generation have previously been estimated for individual projects;
- **The use of displacement rates which appear too high for B8 uses, and the unsubstantiated application of comparatively modest multiplier rates.** Again, reference to industry standard assumptions suggests a relatively significant scale of local departure, the result being again a lowering of the associated calculated job growth within the Council's evidence base; and

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Policy LPAOS

- **An absence of evidence to support the exclusion of sites used in the assessment as part of a sensitivity scenario,** including land north east of Junction 23 of the M6. There is also an absence of robust justification to support the preference for trajectories which suggest a lower rate of job generation across the sites.

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Policy LPAOS

4.35 When applying alternative, appropriate and justified assumptions, AMION considers that the employment sites would support a higher level of employment growth than estimated by the Council. Whilst higher levels of job growth could be calculated where corrections are applied across all components of the calculation, it is reasonable to assume that up to 16,849 jobs could be generated over the period used within the SHMA Update (2016 – 2033). This is some 5,152 jobs higher than the level of job growth concluded in the ELNS Addendum, and taken forward in the SHMA Update.

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Policy LPAOS

4.36 AMION estimates that 17,872 jobs could be generated over the full plan period (2016 – 2035). It is of note that this level of job growth aligns comparatively closely to the Growth Scenario (17,100 jobs) presented within the Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA), which was produced in final form by the same authors of the SHMA Update in 2018. This important sub-regional evidence base document is also considered further in section 6 of this report.

4.37 On the basis of the analysis considered, and the review of the Council's evidence base, AMION concludes that it is reasonable to test the implications of St Helens' economy creating 11,967 – 16,849 jobs over the projection period used in the SHMA Update (2016 – 2033), and 12,754 – 17,872 jobs over the full plan period (2016 – 2035).

Implications for Housing Need

- 4.38 The PSLP is clear to reference that the acknowledged ‘*substantial need for new housing development*’ is linked to both demographic needs ‘*and the need to provide sufficient housing to support employment growth*’⁶².
- 4.39 This mirrors wider research and strategies across the City Region. For example, the State of the Liverpool City Region Report ‘*Making the Most of Devolution*’ recognises the importance of retaining a workforce to realise the positive impacts of investment. It states that:
- “People typically move to cities to get jobs – preferably good ones. But often they stay because of the quality of life there. Smart decision-makers understand the significance of attracting and retaining skilled workers to their cities. And they recognise that the quality of life for workers and their families is an increasingly important factor”*⁶³
- 4.40 It is understood that the SHMA Update uses a demographic cohort model to align forecast employment growth with the demographic changes which are required to support it. The model, as described in section 3 of the SHMA Update, ensures that there is a sufficient number of working age and economically active people to support the changing numbers of jobs each year. The use of such models has been widely endorsed by Inspectors in the application of the previous iteration of the PPG methodology for calculating housing need.
- 4.41 In order to test the scale of job growth concluded by AMION, Edge Analytics has built a demographic cohort model using the POPGROUP suite of software, based on reasonable assumptions that are detailed later in this section. Such an approach is comparable in broad terms to that used in the Council’s evidence base, and enables a direct comparison to be made.
- 4.42 The model has been used to constrain demographic change to the range of employment forecasts, introduced above. This indicates that a much greater level of housing provision would be needed to support forecast job growth in St Helens, beyond the standard method (468dpa) or the Council’s assessment of the housing needed to support job growth (486dpa). This results from the model indicating that a much greater level of population growth is required to provide the labour needed to support the local economy. Table 4.1 illustrates the output of the modelling.

⁶² St Helens Borough Local Plan 2020-2035 Submission Draft January 2019, paragraph 4.6.7

⁶³ The State of Liverpool City Region Report: Making the most of devolution, University of Liverpool, Liverpool John Moores University, Paragraph 2.6

Table 4.1: Housing Needed to Support Future Job Growth in St Helens (2016 – 2035)

Scenario	Job growth	Population change	Total housing need	Dwellings per annum
AMION estimates	17,872	38,421	19,778	1,041
ELNS Addendum	12,754	29,087	16,009	843

Source: Edge Analytics, 2019

4.43 Edge Analytics' modelling makes a set of comparatively standard assumptions in order to consider the changing relationship between employment creation and population growth, as follows:

- Where **unemployment** rates are high, there could be a reasonable expectation that this reduces when new jobs are created as existing residents are encouraged to join the labour force. As of 2017, however, the rate of unemployment in St Helens (4.4%) is notably low, falling below the pre-recession average (5.4%) and the longer-term average (6.6%). Indeed, unemployment in the borough is at its lowest rate for at least 13 years. As such, there is currently no evidence-based justification for assuming that a further reduction will occur in the future, with unemployment therefore fixed at this rate throughout the plan period. The SHMA Update similarly concludes with regard to unemployment that '*further significant improvements are unlikely*'⁶⁴;
- **Economic activity rates** are an important consideration, and are influenced by the changing behaviour of the labour force. This includes changes to the state pension age, changing attitudes of parents towards remaining in or returning to work and the age at which younger people join the workforce. Forecasting these behaviours is evidently challenging, recognising that a future position cannot be simply derived from past trends. Edge Analytics' modelling takes account of national forecasts produced by the Office for Budget Responsibility⁶⁵ (OBR), which are relied upon by the Government for the purposes of long-term budgetary planning. Forecast changes have been applied to the rates recorded amongst different age groups in St Helens by the 2011 Census. This is considered to be a robust approach which applies reasonable assumptions on long-term changes in labour-force behaviour. It is understood that the approach differs from that taken within the SHMA Update, which derives a baseline position from forecasts produced by Oxford Economics. This is not considered to be a preferable method, given that the forecasting houses' outputs are iterative, unverified and often divergent from earlier iterations or the views of other forecasting houses. By way of example, the SHMA Update is understood to rely upon significantly elevated levels of economic participation amongst older age cohorts, exceeding 40% for those aged 65 to 69 and surpassing 14% for those aged 70 to 74⁶⁶. Applying OBR forecasts to local rates in St Helens would suggest

⁶⁴ GL Hearn (January 2019) St Helens SHMA Update, paragraph 4.12

⁶⁵ The modelling uses the OBR forecasts published in July 2018

⁶⁶ GL Hearn (2017) Liverpool City Region Strategic Housing & Employment Land Market Assessment (SHELMA), Appendix C Table 71. By 2037, rates of 46.0% and 41.4% are respectively assumed for males and females aged 65 to 69, with respective rates of

16 that these rates would be more likely to be in the order of 26% and 13% respectively by the end of the plan period. The realism of the assumptions made in the SHMA Update do not appear to have been tested, and consequently there is a real risk that they will underestimate the labour force growth that is likely to be required to support job creation; 16

- Based on past trends, a number of people can be expected to hold more than one job ('double jobbing'). As a result, not every new job will need a "new" person within the labour force, as some people will fill more than one position. The SHMA Update makes allowance for this, to reflect historic evidence that 2.7% of workers in St Helens have a second job⁶⁷. The modelling by Edge Analytics takes an identical approach in this regard; and
- **Commuting trends** affect both the number of residents working outside of St Helens, and the flow of workers travelling into the borough from elsewhere. This dynamic means that an inflow cannot be considered independently of the factors generating outflows in the opposite directions. The balance between these flows is termed the commuting ratio, such that a ratio greater than 1.0 indicates that there is a net out-commute with the resident labour force larger than the level of employment available in the area. In contrast, a ratio of less than 1.0 indicates that employment in an area exceeds the size of its labour force, resulting in a net in-commute. In St Helens, a commuting ratio of 1.21 was recorded by the 2011 Census, indicating that there is a net out-commute of residents⁶⁸. In the context of the Council's stated pursuit of 'balanced growth' through the PSLP⁶⁹, the modelling developed by Edge Analytics assumes that job growth is supported in a more balanced way, with a ratio of 1.0 effectively assuming that every new job is filled by resident labour. As a result, a more balanced commuting ratio of circa 1.17 is achieved by the end of the plan period, continuing the improving trend observed since 2001 when a ratio of 1.26 was recorded in the borough. This approach is considered appropriate in the context of the growth strategy approach taken in St Helens but should not be viewed as preferable more generally to the application of a fixed ratio which is usually applied and it is noted was used in the SHELMA where needs were considered across a larger geography. 17 Policy LPA05 17

- 4.44 Based on these assumptions – and as shown at Table 4.1 – the modelling indicates that at least 843 homes per annum would be required over the plan period to accommodate the labour that is needed to support future job growth, and the wider economic growth strategy for St Helens. This is significantly higher than implied by the SHMA Update, which claims that some 12,000 jobs could be supported through the provision of only 490 homes each year.
- 4.45 Peel considers on this basis that the need presented in the SHMA Update represents a substantial underestimate, with it being based on unrealistic assumptions around the economic activity of older people and – most significantly – a flawed approach to the

16.0% and 14.2% for those aged 70 to 74. A comparison cannot be made for the "75+" category as the OBR forecast covers a slightly different cohort (75-89)

⁶⁷ GL Hearn (January 2019) St Helens SHMA Update, paragraph 4.11

⁶⁸ This ratio is also referenced in the LCR SHELMA as being used in the modelling for St Helens at Table 34

⁶⁹ St Helens Council (January 2019) St Helens Borough Local Plan 2020-2035 Submission Draft, p13

treatment of commuting in looking at the impact of the creation of job growth in the borough and the housing required to accommodate a labour force. These flaws are considered further below.

- 4.46 In respect of the emerging portfolio of B class sites in the borough, the ELNS Addendum considers the proportion of on-site jobs that may be taken by residents of St Helens. It rightly highlights that commuting patterns are not uniform within the borough, with a number of the large logistics sites, for example, located at the periphery close to the motorway network which is likely to lead to a greater proportion of workers travelling in from outside of St Helens. Cumulatively, the ELNS Addendum appears to assume that 40% of those working at these sites by 2033 reside in St Helens, which is not considered unreasonable in principle. It should, however, be recognised that the planning process is likely to encourage many developments to implement processes which help to maximise the employment of local people.
- 4.47 This site specific assumption solely concerns the rate of *in-commuting* to specific employment sites in St Helens, however. As introduced above, this is only one part of the commuting dynamic; it takes no account of the fact that not all residents of St Helens work in the borough, or that residents will continue to travel to work in proximate, growing economies. This balance is fully reflected in the commuting ratio, but not by a broad assumption that only circa 40% of jobs are taken by St Helens residents on individual sites which are then cumulatively considered in this regard in the ELNS Addendum.
- 4.48 This challenges the approach taken in the SHMA Update, which simply takes this assumption to estimate the number of additional residents needed for all B class jobs to be filled. It neglects to allow for residents working outside of the borough, and is further confused by the labelling of Table 5 as an '*estimate of [the] number of jobs filled by St Helens residents*'. It appears that the analysis actually seeks to calculate how many new residents there would have to be in St Helens for the jobs created to be filled, taking account of all commuting dynamics.
- 4.49 As a result, there is a fundamental inconsistency between the adjustments made to B class and non-B class jobs for commuting. An overall commuting *ratio* of 1.21 is applied to non-B class jobs, in line with the position recorded in 2011. In contrast, the SHMA effectively applies a commuting ratio of 0.4 to B class jobs. This results in an overall commuting ratio of circa 0.7, which implies a significant divergence from evidenced trends. It would also have significant implications on displaced housing need pressures in other neighbouring authorities, where the homes required to accommodate the other 60% of jobs on the employment sites would need to be provided. The SHMA Update does not acknowledge this implicit assumption, or make any attempt to justify or validate such a marked departure from current trends.
- 4.50 Edge Analytics' modelling does not rely on such significant changes in commuting patterns, but has sought to apply a more reasonable approach to reflect the Council's ambitions for balanced growth.
- 4.51 Whilst the assumption set out at paragraph 4.43 for future commuting is considered appropriate a further sensitivity has been run to explore the impact of a more pronounced, but still broadly reasonable, change in commuting trends. This recognises

the scale of job growth anticipated in St Helens in the context of the city-region. This sensitivity assumes that the ratio reduces to 1.1 by 2035, improving from the position in 2011 (1.21) or the eventual outcome of a balanced take-up of new jobs (1.17). In simple terms, this assumes that the absolute net outflow of residents from St Helens reduces by around 40% over the plan period.

- 4.52 Even with this comparatively optimistic assumption, *at least* 596 dwellings per annum would be needed to support the job growth estimated in the ELNS Addendum, increasing to 816 dwellings per annum based on the alternative estimates developed by AMION of likely employment generation associated with the growth strategy. This continues to exceed the outcome of the standard method, and the Council's proposed housing requirement.

Table 4.2: Housing Needed to Support Future Job Growth in St Helens; with Commuting Sensitivity (2016 – 2035)

Scenario	Job growth	Population change	Total housing need	Dwellings per annum
AMION estimates	17,872	27,707	15,495	816
ELNS Addendum	12,754	17,402	11,315	596

Source: Edge Analytics, 2019

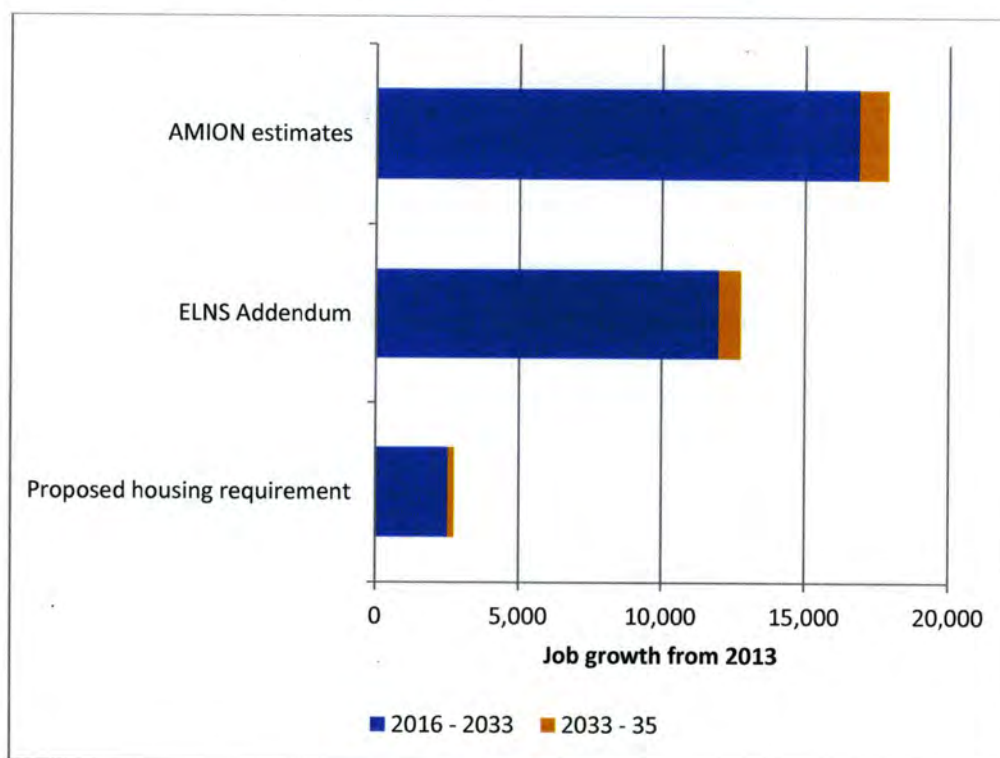
- 4.53 Whilst the modelling indicates a notably higher need for housing associated with the anticipated job growth, this principally reflects the flawed treatment of commuting in the Council's latest evidence base documents. Section 6 considers in more detail other previous assessments of housing need, and it is noted in this regard that a City Region wide assessment (SHELMA) arrived at a need for 855 dwellings per annum, associated with a broadly comparable level of job growth. This is considered further in section 6 of this report.
- 4.54 Ultimately, the SHMA Update now assumes that a much larger pool of external labour can be accessed to support job growth in St Helens, relying on the borough's current and future residents to a considerably smaller extent than evidentially, or indeed optimistically, assumed by Edge Analytics. This clearly implies that the homes needed to accommodate this additional labour must be acknowledged and planned for elsewhere, yet there are no such arrangements in place. Indeed, the PSLP goes so far as confirming that neighbouring authorities have no capacity within their urban areas to 'accommodate any of the housing need arising in St Helens Borough'⁷⁰. The implicit assertion that a significant share of the labour needed to support planned job growth in St Helens can be housed elsewhere is therefore unsubstantiated, and increases the prospect that labour will not be available to support this growth.
- 4.55 In delivering the level of housing provision proposed in the PSLP and relying on such a significant and untested change in commuting patterns, there is clearly an increased risk that the growth strategy for St Helens will be fatally undermined by a lack of available labour where such a change does not materialise. This can be illustrated

⁷⁰ St Helens Council (January 2019) St Helens Borough Local Plan 2020-2035 Submission Draft, paragraph 4.18.9

through further modelling developed by Edge Analytics, which assumes that 486 dwellings per annum are provided throughout the plan period and makes *no change* to the commuting ratio recorded for St Helens by the 2011 Census. Under such a scenario, growth in the resident labour force would support no more than in the order of 3,000 jobs by 2035. This would reduce further where an improvement in younger household formation is assumed to lead to smaller average household sizes⁷¹.

- 4.56 As illustrated in the following chart, this represents a fraction (c.20%) of the jobs considered likely to be created in St Helens as a result of the Council's growth strategy, even based on the overly conservative estimates presented in the ELNS Addendum. This reduces further (c.15%) against the higher estimates developed by AMION.

Figure 4.1: Job Growth Supported through Proposed Housing Requirement compared to forecast growth



Source: Edge Analytics, 2019

Summary and Implications

- 4.57 As set out in section 3, the PSLP is predicated upon a strategy of growth. The analysis in this section has affirmed that this strategy has significant support in the context of a wider City Regional commitment to growth. This includes a signed Devolution Deal with Government which has enabled the City Region authorities to access specifically targeted funding. Further evidence of likely deliverability of the growth strategy is also presented in the context of strong market evidence to support the PSLP's focus on

⁷¹ When a return to higher rates of younger household formation amongst younger people is assumed, the same number of dwellings would resultantly accommodate *fewer* people than would be the case if no improvement was assumed

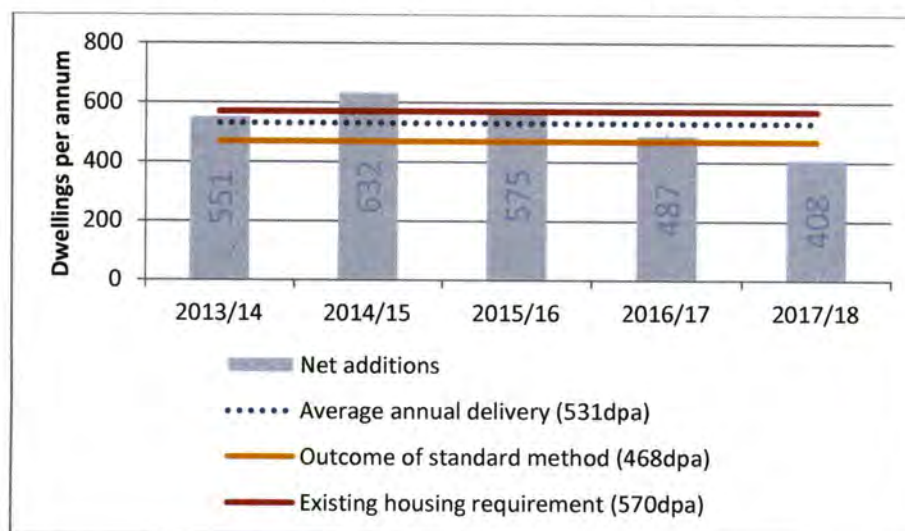
providing employment land to serve local and city-regional demand for warehouse and logistics uses.

- 4.58 AMION has undertaken a review of the approach taken within the ELNS Addendum which arrives at an identified likely level of job growth associated with the successful delivery of the growth strategy. This has identified a number of areas where the assumptions applied do not have adequate justification and are not considered robust. AMION has identified the impact of applying more reasonable assumptions using the same methodology deployed in the study, the result being a higher estimate of the level of job creation which could reasonably be expected through the Council's growth strategy.
- 4.59 The analysis undertaken by AMION also identified flaws in the approach taken in the interpretation of the calculated job growth into a need for housing within the SHMA Update. This principally relates to the application of variant assumptions around commuting which, when applied, imply that St Helens would see a pronounced change in commuting dynamics. These assumptions are not justified, and would have marked consequences for the generation of housing need pressures being displaced into surrounding authorities. It is of note that the Council has confirmed that adjacent authorities do not have capacity to accommodate these unmet needs therefore creating a lack of integration in housing and employment policies.
- 4.60 Edge Analytics has developed a model to assess the implication of varying levels of job growth on housing need. Even to support the level of job growth identified in the ELNS Addendum / SHMA Update, this identifies that in the order of 840 homes per annum would be required where more reasonable labour-force assumptions are applied within the modelling.
- 4.61 It is recognised that the growth strategy is predicated upon providing for a level of unmet need for employment land from across the City Region, and that there are sustainability benefits associated with reducing out-commuting. A further scenario has been run which assumes a more marked reduction in the current rate of out-commuting, to a level which is considered reasonable based on changes seen historically. Even with this assumption, which sees the absolute net out-commute fall by 40%, supporting the Council's own estimate of job growth would suggest the need for in the order of 600 homes per annum. Achieving the higher level of job growth, identified by AMION as being more representative of the delivery of the growth strategy, would suggest a need for in the order of 800 homes per annum in St Helens.
- 4.62 The analysis has also conclusively proven that the trend-based approach under the standard method would fall significantly short of providing the labour needed to deliver the PSLP's growth strategy. It is clear that an uplift is necessary beyond the standard method figure, and that the 4% adjustment proposed in the Council's evidence base is demonstrably inadequate in this regard.

5. A Strong Housing Delivery Context

- 5.1 As highlighted in section 2, the PPG⁷² acknowledges that outside of factors which may result in above trend growth, including a growth strategy, there are other situations which should be taken into 'account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests'.
- 5.2 While the Council has proposed a modest departure from the standard method within the PSLP, primarily in recognition of the growth strategy it is pursuing, it does not appear to have taken past delivery into account in determining the level of need that may be appropriate to plan for in St Helens. This is a notable omission, particularly given the Council's previous assertions when preparing the Core Strategy that '*high delivery rates...demonstrate what could realistically be achieved in St Helens*'⁷³.
- 5.3 This provides further confirmation, building on the evidence in the preceding section, that a more pronounced uplift from the standard method is justifiable and appropriate.
- 5.4 It is evident that completions in St Helens have exceeded the figure generated by the standard method in four of the past five years⁷⁴. As shown in the following chart, as many as 632 homes have been completed in a single year within this period, which is more than one third (35%) higher than the standard method figure. On average, 531 dwellings per annum have been completed in St Helens since 2013, surpassing the standard method by 13% and effectively recovering to approach the pre-recession average (572dpa; 2003 – 2007).

Figure 5.1: Comparing Standard Method with Recent Delivery in St Helens



Source: MHCLG; Turley analysis

⁷² PPG Reference ID 2a-010-20190220

⁷³ St Helens Council (May 2011) Local Development Framework Core Strategy Background Paper: Housing, paragraph 5.61

⁷⁴ MHCLG (2018) Table 122: net additional dwellings by local authority district

- 5.5 Figure 4.1 also overlays the existing housing requirement of 570 dwellings per annum, demonstrating that delivery over the past five years has come close to meeting this requirement. Since 2013, some 93% of the housing growth planned in St Helens has been delivered, increasing to 98% when the latest year (2017/18) is discounted.
- 5.6 There is clearly a strong market demand for such a level of housing growth in the borough, vindicating the Inspector's original support for the '*ambitious growth aspirations*' that informed the Core Strategy's housing requirement⁷⁵.
- 5.7 This represented a planned continuation of the housing requirement set through the Regional Spatial Strategy (RSS) in 2008, which had itself been increased from an earlier requirement for 400 dwellings per annum in the Regional Planning Guidance for the North West (RPG13), adopted in 2003. It is clear that the Council '*encouraged and supported*' this increase '*to meet its growth aspirations*', having '*for some time been pursuing growth in housing*'⁷⁶.
- 5.8 Equally, the Council considered that a continuation of this level of housing provision through the Core Strategy was '*appropriate*' despite the '*difficult economic conditions of recent years*'⁷⁷. It aligned with:
- "...the aspirations of the borough to grow...[as] advocated in the Sustainable Communities Plan and City Growth Strategy. By growing the local population, this will help to diverse [sic] the demographic profile of the borough and make a contribution to increasing housing supply across the broader region and hence nation. This will also help the borough to pursue residential-led development to deliver urban regeneration and help achieve the goals for increasing the supply of affordable housing to meet local needs"*⁷⁸
- 5.9 In reporting on the Core Strategy, the Inspector was clear that there was '*nothing to suggest that this is not a sound approach*' in St Helens⁷⁹.
- 5.10 It is evident that this rate of housing provision in St Helens has generated benefits for the borough and its residents. For example, the ratio between house prices and earnings has remained comparatively stable over the latest four years for which data is available⁸⁰ (2014 – 2017). The modest 4% increase in the published ratio for St Helens has fallen below that seen across the North West (7%) and England (12%) over the same period, indicating that the successful delivery of planned housing growth has contributed towards averting the more severe worsening of affordability seen elsewhere. Reducing delivery from its recent levels, to align with the outcome of the standard method for example, increases the risk that the affordability of housing in St Helens will deteriorate.

⁷⁵ Planning Inspectorate (August 2012) St Helens Council Local Plan Core Strategy, Inspector's Report, paragraph 50

⁷⁶ St Helens Council (May 2011) Local Development Framework Core Strategy Background Paper: Housing, paragraphs 5.57 and 5.60

⁷⁷ Planning Inspectorate (August 2012) St Helens Council Local Plan Core Strategy, Inspector's Report, paragraph 50

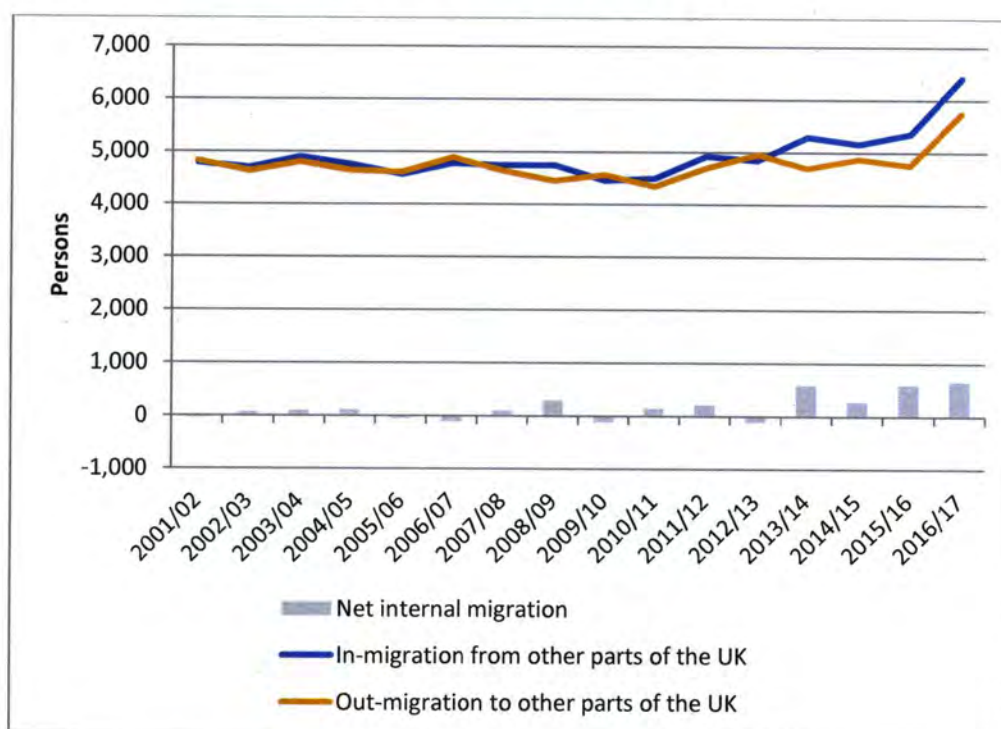
⁷⁸ St Helens Council (May 2011) Local Development Framework Core Strategy Background Paper: Housing, paragraph 5.62

⁷⁹ Planning Inspectorate (August 2012) St Helens Council Local Plan Core Strategy, Inspector's Report, paragraph 50

⁸⁰ ONS (2018) House price to workplace-based earnings ratio, ratio of median house price to median gross annual workplace-based earnings

- 5.11 Delivering planned housing growth has also attracted new residents to St Helens, achieving greater success in this regard than was previously the case and supporting the targeted diversification of the borough's demographic profile. The following chart tracks the annual inflow of UK residents into St Helens, the outflow of residents to other parts of the UK and the balance between these flows⁸¹ ('net internal migration'). This shows that the borough has attracted more people than it has lost over the past four years for which data is available (2014 – 2017), largely by accommodating an increased inflow from other parts of the UK.

Figure 5.2: Net Internal Migration to St Helens (2001 – 2017)



Source: ONS

- 5.12 This is clearly consistent with the ambitions of the adopted Core Strategy, which aimed to regenerate St Helens by developing 'attractive neighbourhoods' and ensuring that the borough is 'a sought after residential area'⁸². It provides a further signal of the strong underlying demand for housing in the area, where policy is supportive of its delivery.

Summary

- 5.13 The Council has previously recognised that past completions provide an important insight into the level of delivery that can be realistically achieved in St Helens. The PPG acknowledges that there will be situations where historic delivery is significantly greater than the standard method, and requires authorities to take such evidence into account.

⁸¹ ONS (2018) Population estimates; summary components of change

⁸² St Helens Council (October 2012) St Helens Local Plan Core Strategy, paragraphs 4.4 – 4.6

- 5.14 Annual completions in St Helens have exceeded the figure generated by the standard method in four of the past five years, by as much as a third. On average, 531 dwellings per annum have been completed in the borough over the past five years, surpassing the minimum starting point figure derived from the standard method by 13% and effectively recovering to approach the pre-recession average.
- 5.15 Recent delivery has come close to meeting the adopted housing requirement of 570 dwellings per annum, which originated from regional policy with clear support from the Council. Such a level of provision reflected its longstanding growth aspirations, and was intended to support urban regeneration, deliver affordable housing and secure a diversification of the borough's demographic profile. Achieving this rate of provision over recent years has evidently supported the successful attraction of new residents to St Helens, and assisted in broadly stabilising the affordability of housing in the borough relative to the wider region and England.
- 5.16 Against this context, reversion to the standard method (468dpa) would represent a significant regression from recent rates of delivery, undermining the positive steps taken in realising the Council's ambitions over recent years. While the Council has proposed a slight increase from this minimum figure, its proposed requirement for 486 homes per annum continues to fall below the average rate of recent delivery and does not appear to have been considered within this context.

6. A Review of the Previous Assessments of Housing Need

- 6.1 Further to looking at historic rates of delivery, the PPG – as introduced in section 2 – confirms that consideration should also be given to situations where a recently produced SHMA has identified a significantly greater need than the figure derived from the standard method⁸³.
- 6.2 The Council has previously commissioned a number of housing needs assessments, to inform its development of the new Local Plan. These include:
- The Mid Mersey Strategic Housing Market Assessment⁸⁴ (SHMA), published in January 2016; and
 - The Strategic Housing and Employment Land Market Assessment (SHELMA) for the Liverpool City Region and its constituent authorities, including St Helens. A 'consultation draft report'⁸⁵ was completed in January 2017, and a 'final report'⁸⁶ dated March 2018 is available on the Council's website.
- 6.3 It is of note that the SHMA Update – published by the Council in January 2019 – was produced by the same authors as the above assessments, albeit it is recognised that the national policy context has evolved in the intervening period through the publication of the revised NPPF in July 2018.
- 6.4 This report has already referenced the SHELMA in considering the scale of housing provision needed to support economic growth. This recognised that the SHELMA has the distinct benefit of having been undertaken at a City Region level, as opposed to an individual local authority, with an ability to explore key issues around the operation of functional housing market and economic geographies.
- 6.5 With regards the operation of a housing market area, it is also true that in contrast to the SHMA Update the original SHMA was undertaken for the whole of the Mid Mersey geography, with this seen to represent a functional market area. The presentation of analysis in these studies at a wider geographic level, albeit noting that they do not represent the latest assessment of need, is important when acknowledging the PSLP's approach to accommodating unmet needs for employment land (logistics and warehousing) arising from outside of St Helens.
- 6.6 This section reviews these studies in more detail, looking first at the SHELMA as the most recent assessment and then the Mid Mersey SHMA to directly assess the requirement of the PPG in this regard.

⁸³ PPG Reference ID 2a-010-20190220

⁸⁴ GL Hearn (2016) Mid Mersey Strategic Housing Market Assessment

⁸⁵ GL Hearn (2017) Liverpool City Region Strategic Housing & Employment Land Market Assessment (SHELMA) – consultation draft report

⁸⁶ GL Hearn (2018) Liverpool City Region Strategic Housing & Employment Land Market Assessment (SHELMA) – final report

SHELMA

- 6.7 The SHELMA was commissioned by the local planning authorities within the Liverpool City Region to provide '*a consistent joint evidence base for housing and employment land needs over the period to 2037*'. It is clearly intended to provide '*an evidence base supporting the preparation of local plans by individual authorities within the City Region*', also informing the preparation of a statutory City Region Spatial Framework⁸⁷.
- 6.8 The preparation of this spatial framework forms an important component of the Devolution Deal. Ensuring sufficient housing is available across the whole area will be critical to ensuring the growth aspirations underpinning the deal and the award of funding are able to be supported.
- 6.9 The draft SHELMA was published for consultation in October 2017 and presented, *inter alia*:
- An **objective assessment of housing need** (OAN) across the City Region, aggregated from figures for each local authority. The '*starting point*' for this assessment was the then-latest 2014-based household projections, which were adjusted to incorporate the then-latest 2015 mid-year estimates (MYE). Positive adjustments to household formation rates were applied in only two authorities (Halton and West Lancashire), before consideration was given to the need for an uplift to support *baseline* employment growth. The final adjustment uplifted the demographic-based need figures for Sefton, West Lancashire and Wirral by 10%, to reflect market signals in these authorities.; and
 - A "**Growth Scenario**", which adjusted a baseline employment forecast to reflect planned investments and policy aspirations. This was based on additional information supplied by the Local Enterprise Partnership (LEP) and each of the local authorities in the functional economic market area, and was expressly intended to inform a refresh of the LEP's Strategic Economic Plan⁸⁸. It was estimated that the Growth Scenario could lead to the creation of 119,700 full time equivalent (FTE) jobs across the Liverpool City Region over the period from 2012 to 2037, more than doubling the presented baseline (52,800) with a particularly marked difference in St Helens⁸⁹ (2,700 to 15,800 FTE jobs; +485%), reflecting the growth strategy of the borough in its evolving Plan. As referenced in section 4, the draft SHELMA assessed the level of housing provision that would be needed to accommodate such a level of employment growth, across the City Region and within individual authorities.
- 6.10 The following table summarises the outputs of this process for St Helens, the Mid Mersey HMA and the Liverpool City Region as a whole. In St Helens, there is a concluded OAN of 416 dwellings per annum, annually uplifting the '*starting point*' by a single dwelling. There is, however, a clear appreciation that planned investments and the realisation of policy aspirations would be expected to generate a considerably greater need for 855 homes each year, to accommodate the labour force necessary to

⁸⁷ *Ibid*, paragraphs 1.1 – 1.2

⁸⁸ *Ibid*, paragraph 2.17

⁸⁹ *Ibid*, Tables 15 and 16

support associated job growth. It is this end of the range which evidently aligns more closely to the economic growth strategy being pursued by the Council through the PSLP.

Table 6.1: OAN and Growth Scenario for St Helens (dwellings per annum; 2014 – 2037)

	St Helens	Mid Mersey	Liverpool City Region
2014-based projections – the ‘starting point’	415	1,434	4,780
Preferred demographic projection	416	1,432	4,855
Supporting baseline economic growth ⁹⁰	416	1,691	5,135
Affordability adjustments ⁹¹	416	1,691	5,275
Objectively assessed need	416	1,691	5,275
Adjustment from ‘starting point’	0%	+18%	+10%
Economic Growth Scenario	855	2,393	6,122

Source: GL Hearn, 2017

- 6.11 In considering the requirements of the PPG, it is apparent that the most recent previous assessment of housing need arrived at a clear conclusion that supporting growth plans – considered as part of a wider City Region growth strategy – would generate a significantly greater need for housing than implied by the standard method. Indeed, the 855 homes per annum calculated as being needed to support planned job growth was some 387 homes per annum or 83% higher than the Council’s latest calculated standard method figure (468dpa).
- 6.12 It is acknowledged that the lower end of the range concluded within the SHELMA, the OAN, showed a closer alignment to the standard method. However, this is unsurprising given that this used similar trend-based demographic and affordability indicators, and considered a future level of economic growth which did not reflect the Council’s strategic policies in the emerging Local Plan.
- 6.13 With regards to the concluded OAN, it is also of note that Peel submitted detailed representations on the draft SHELMA, supporting the development of a robust evidence base for the City Region but raising a number of concerns and various recommendations relating principally to the robustness of the concluded OAN figure. Specifically, when focusing on issues of the greatest relevance to the assessment of housing need presented for St Helens, these included:
- Evidence that the latest population estimates for the Liverpool City Region showed a positive departure from historic rates of growth, raising concern that an overreliance on past trends would risk perpetuating a more negative position;

⁹⁰ Uplifts applied on individual authority basis where “economic baseline scenario” was higher than the preferred demographic projection; where the economic baseline is lower, the preferred demographic projection is not adjusted

⁹¹ The SHELMA only applies an “affordability uplift” in Sefton, West Lancashire and Wirral

- The baseline employment forecast was not up-to-date at the time of the analysis, and is now even more dated. Supporting the level of growth suggested by this forecast would require *fewer* homes in St Helens than implied by the demographic projection, yet this is based on the views of only one forecasting house that were not adequately interrogated or validated in the local and sub-regional context;
 - Concerns that further justification was required as to the assumptions used with regards to forecast changes in labour force behaviour, a point restated in the context of the Council's latest evidence in section 4 of this report;
 - The Growth Scenario was considered to represent a more appropriate minimum position from which to plan for future housing needs in the Liverpool City Region, albeit concerns were raised that there was an overreliance on short-term knowledge which assumes a reversion to low rates of growth after 2026 and thereby fails to capture the potential for catalytic effects of investment over the long-term. It is recognised that the Council's latest evidence attempts to overcome this criticism, providing a more transparent and detailed consideration of the impact of its strategy for accommodating economic growth. As noted in section 4, however, AMION has identified concerns that the full impact is being underestimated;
 - Responding to market signals in only three authorities conflicted with the approach that was then proposed by Government, and has since been implemented through the revised NPPF. The standard method applies an uplift where the average worker cannot afford housing in the local area with up to four years' earnings, and it is notable that each of the Liverpool City Region authorities continues to record a ratio which exceeds this threshold by at least 14%⁹². Adjustments of 3-16% are therefore applied across the individual authorities through the standard method, largely exceeding the 3% uplift that is cumulatively applied across the Liverpool City Region in the draft SHELMA and notably contrasting with the application of no uplift in Mid Mersey and St Helens; and
 - The draft SHELMA did not present an up-to-date and consistent assessment of affordable housing need across the Liverpool City Region, inhibiting a full and proper consideration of the requirement to provide additional homes in certain authorities to facilitate the delivery of affordable housing.
- 6.14 The '*final*' version of the SHELMA was completed in March 2018, and is now available on the Council's website. A comparison with the draft SHELMA confirms that only minor changes have been made to the document, and as such Peel's concerns have not been addressed and remain pertinent in considering the appropriateness and robustness of the concluded lower end of the range of need in the study. There appears to be no record of how the authors have responded to comments raised during consultation on the draft SHELMA.

⁹² ONS (2018) House price to workplace-based earnings ratio, median

- 6.15 Peel considers that the calculated OAN for 416 dwellings per annum in St Helens does not provide an accurate reflection of local housing needs in the borough. The Growth Scenario should, however, have provided an important point of reference for the Council in arriving at a housing requirement in the PSLP, capturing both the scale of ambition and the pipeline of investment in the borough while highlighting the housing growth that may be necessary to sustainably accommodate the requisite labour force. The SHELMA indicates that this would require a level of housing growth which is significantly higher than the standard method and that now concluded in the latest SHMA Update.

Mid Mersey SHMA

- 6.16 Whilst the SHELMA represents the most recent published assessment of housing need for St Helens, the Mid Mersey SHMA has also been used to inform previous iterations of the emerging Local Plan. This study provided an OAN for housing in St Helens, in the context of the Mid Mersey housing market area (HMA). This geography extended to cover neighbouring Warrington and Halton, albeit a breakdown to individual authorities is provided.
- 6.17 Following a similar approach to deriving the lower end of the range in the SHELMA, the SHMA concluded that 451 homes would be needed in St Helens each year between 2014 and 2037, as part of an overall need for 1,756 dwellings per annum across the HMA.
- 6.18 Across the HMA, the OAN was 14% higher than the '*starting point*' of the then latest 2012-based household projections. In the case of St Helens, however, the adjustments resulted in an OAN which was 3% *lower* than this '*starting point*'. This was the result of the use of an alternative demographic projection in preference to the official dataset, which lowered the '*starting point*' by 2% across Mid Mersey but caused a more marked 20% reduction in St Helens. Evidently this contrasts with the methodology now prescribed by the standard method, which minimises scope to lower official projections but means that comparisons are of less relevance.
- 6.19 Furthermore, the concluded OAN of 451 dwellings per annum was very much presented as a '*baseline*' assessment of housing need. In considering the alignment between job growth and housing need, the SHMA was clear to confirm that projects such as '*Parkside Strategic Rail Freight Interchange, Mersey Gateway Bridge or Omega Park, which are expected to increase employment locally in St Helens, Halton and Warrington respectively and generate spin off growth in neighbouring authorities*' are not taken into account⁹³. Evidently this forms a requirement of the current PPG, again making comparison with this previous assessment of less relevance than the range presented in the SHELMA.
- 6.20 The limitations of the concluded OAN were, it is assumed, recognised by the Council at the time. This was reflected in the decision to identify a housing requirement of 570 dwellings per annum in the previous iteration of the Plan (the POLP), acknowledged that such a level of delivery was needed to realise its strategic objectives. This was

⁹³ GL Hearn (2016) Mid Mersey Strategic Housing Market Assessment, paragraph 5.5

proposed by the Council in the context of and directly informed by the conclusions of this evidence base of local housing needs.

Summary

- 6.21 The PPG confirms that previous assessments of need should be taken into account in considering whether it is appropriate to plan for a higher level of housing need than implied by the standard method. This section has considered the most recent previous assessments, and those which have been used to inform previous drafts of the emerging Local Plan.
- 6.22 The SHELMA represents the most up-to-date previous assessment of housing need, and – as referenced in earlier sections of this report – had the benefit of being prepared across the wider functional economic and housing market geography. The SHELMA concluded that achieving the growth strategy of St Helens and delivering planned investments would generate a need for **855 dwellings per annum**.
- 6.23 While Peel had a number of concerns around the methodology used to develop this scenario – which have not been taken into account in finalising the SHELMA – it should nonetheless have provided an important point of reference for the Council in arriving at a housing requirement, with the scenario considered to provide a more appropriate minimum position across the Liverpool City Region. It evidently exceeds the figure generated through the standard method by a significant margin (83%) but does not appear to have featured in the Council's development of the PSLP.
- 6.24 It is acknowledged that the SHELMA presented its conclusion on local housing need in the form of a range, with this figure of 855 dwellings per annum forming the upper end of a range linked to a growth strategy for St Helens and the wider City Region. At the lower end of the range, a need for 416 dwellings per annum was concluded for the borough. The extent to which this assessment is directly comparable to the standard method is limited, however, by its selection of an input demographic projection of need which was lower than the official projections, and its failure to respond to market signals in any way. This and other issues were raised by Peel in its consultation response on the draft SHELMA.
- 6.25 The same issues are also pertinent in making direct comparisons with the need concluded in the preceding Mid Mersey SHMA, which was used to inform the POLP. This concluded with a need for **451 dwellings per annum** in St Helens. The SHMA was clear to identify that this level of need took no account of identified projects that were considered likely to increase employment beyond historic trends, both directly and indirectly and as is now required under the PPG. It is assumed that the limitations of the concluded need in this regard were recognised by the Council, and reflected in its decision to propose a higher housing requirement of **570 dwelling per annum** through the previous iteration of the emerging Plan. This proposed requirement, which it was noted was concluded in the context of the SHMA, is also some 22% higher than the standard method outcome.
- 6.26 In conclusion, and following the PPG, it is therefore clear that the most recent previous assessment identified a range of housing need, which at the upper end and aligned with a growth strategy, was considerably higher than the outcome of the standard

method. It is of note that the implications of the growth strategy – in contrast to an assessment based on past trends – was also acknowledged by the Council in its decision to propose a higher housing requirement of 570 dwellings per annum in the POLP. Again, this figure is significantly higher than the outcome of the standard method.

7. The Implications of Addressing Affordable Housing Need

- 7.1 The PPG requires authorities to undertake a separate calculation of affordable housing need. The method for undertaking this calculation has remained largely unchanged under a number of iterations of the guidance. The PPG describes the calculation as relating to *'the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market'*⁹⁴.
- 7.2 The latest iteration of the PPG, as with earlier versions, continues to state that *'an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes'*⁹⁵.
- 7.3 Within the SHMA Update, a calculation of affordable housing need is presented in accordance with the PPG methodology. This confirms that:
- There are estimated to be 1,253 existing households that are currently in need of affordable housing. While this is modelled and has not drawn upon the current Housing Register, it relatively closely aligns with the 1,280 households reported to be on the waiting list on 1 April 2018⁹⁶. The calculation assumes that existing households' needs will be met through the provision of 74 affordable homes each year over seventeen years. However, a more positive approach which clears the backlog within five years, for example, would more than treble this annual figure over the initial years of the plan period;
 - A further 632 households each year are estimated to form and require affordable housing in St Helens, with a further 584 existing households anticipated to fall into need each year; and
 - These elements of need could be met in part through the estimated annual supply of 1,173 new affordable homes becoming available, with this principally arising through new lettings.
- 7.4 The above indicate that there is a net need for at least **117 affordable homes per annum** in St Helens. This equates to a total need for 1,987 affordable homes over the projection period in the SHMA Update (2016 – 2033).
- 7.5 This annual need can be compared against the Council's published monitoring of affordable housing completions⁹⁷, albeit it appears that no such data has been released over the past five years. As shown in the following table, the eight years to 2013 saw an average of 99 affordable homes completed in St Helens each year. This equated to less than a quarter (23%) of all completions over this period, as calculated by the Council.

⁹⁴ PPG Reference ID 2a-019-20190220

⁹⁵ PPG Reference ID 2a-024-20190220

⁹⁶ MHCLG Live Table 600 Number of households on local authorities' housing waiting lists by district

⁹⁷ St Helens Council (2013) Local Development Framework Housing Land Position Statement, Table 7.6

Table 7.1: New Build Affordable Housing Completions (2005 – 2013)

	Total completions ⁹⁸	Affordable completions	% of total
2005/06	549	15	3%
2006/07	637	72	11%
2007/08	496	26	5%
2008/09	441	25	6%
2009/10	401	233	56%
2010/11	183	73	40%
2011/12	431	214	50%
2012/13	320	135	42%
Total	3,458	793	23%
Average	432	99	23%

Source: St Helens Council, 2013

- 7.6 Government statistics indicate that affordable housing continues to be delivered at a comparable rate, with an average of 104 such homes provided annually in St Helens over the past five years⁹⁹ (2013 – 2018). This similarly equates to around 20% of overall housing supply, albeit the Government's statistics – unlike the Council's – include acquisitions as well as newly built properties.
- 7.7 This clearly shows that a continuation of the average level of affordable housing delivery in St Helens would not meet the calculated annual need for 117 affordable homes throughout the plan period.
- 7.8 In order to successfully achieve the necessary boost in supply – and in accordance with the PPG¹⁰⁰ – it is important for the Council to consider the extent to which its proposed housing requirement represents a sufficient level of housing growth to help deliver the required number of affordable homes. This does not appear to have been considered in the development of the PSLP.
- 7.9 As a minimum, the PSLP seeks to secure between 10-30% of all new dwellings as affordable housing¹⁰¹, although this only applies to market developments with over 11 units. With a proposed housing requirement of 486 dwellings per annum, this could theoretically lead to the provision of 146 affordable homes each year, albeit this is unrealistic given the inherent assumption that *all* sites contribute at the upper end of the range sought through emerging policy. In reality, the PSLP states that such a level of provision (30%) will only be required on larger sites in two of the borough's three

⁹⁸ It is noted that these figures differ from those reported to Government, which inform the analysis in section 4 of this report

⁹⁹ MHCLG Live Table 1008C: total additional affordable dwellings provided by local authority area – completions

¹⁰⁰ PPG Reference ID 2a-024-20190220

¹⁰¹ St Helens Council (January 2019) St Helens Borough Local Plan 2020-2035 Submission Draft, Policy LPC02

Affordable Housing Zones, with a lower requirement (10%) where such sites are located in the third zone and no requirement on small sites.

- 7.10 Historically, the Council has shown that 23% of homes completed in the borough have been affordable, albeit this has varied considerably over the period for which this is calculated (2005 – 2013). In the context of the proposed housing requirement, a continuation of this trend could lead to the provision of around 112 affordable homes per annum. This reduces further to 108 per annum against the figure generated through the standard method.
- 7.11 Both remain slightly short of the calculated need for 117 affordable homes per annum. Meeting this need in full, when assumed that 23% of all new homes are affordable, could require provision for 509 dwellings per annum over the emerging plan period. This is around 23 homes per annum higher than the requirement proposed in the PSLP, and would necessitate the provision of around 437 *additional* homes in total over the 19 year plan period.
- 7.12 Beyond the existence of circumstances which indicate a higher need for housing than implied by the standard method – considered in the preceding sections of this report – this provides further justification for the Council identifying an appropriate housing requirement which is higher than that currently advanced.

Summary

- 7.13 In addressing risks to the delivery of much needed affordable housing, this analysis confirms that there would be a justification for setting a housing requirement which is higher than the concluded local housing figure. The higher levels of need indicated as being required to support job growth would, where they were translated into a housing requirement, also be justified in the context of making a much needed positive contribution in this regard.

8. Summary and Conclusions

- 8.1 This report has considered the soundness of the housing requirement set out in 'Policy LPA05' of the PSLP with regards to its compliance with the NPPF and PPG.
- 8.2 Specifically, this has focused on the evidence published by the Council to justify its concluded need for 486 homes per annum in St Helens over the plan period (2016 – 2035), noting that this level of need is directly translated into the proposed requirement.
- 8.3 By way of context, this annual housing requirement has reduced by circa 15% from the 570 dwellings per annum proposed in the Preferred Options Local Plan (POLP). It equates to a total cumulative requirement for 9,234 dwellings over the plan period, reduced from 10,830 dwellings in the POLP.
- 8.4 It is recognised that the PSLP housing requirement and the underpinning evidence of housing need has been produced within the context of the NPPF and PPG, as revised in 2018. The revisions have introduced a new method for calculating housing need which has formed an important context for the change in the requirement.

The Council's calculation of housing need

- 8.5 In arriving at the new housing requirement, the Council has correctly started by using the output of the standard method. In accordance with the PPG, it has then identified a number of circumstances where it is likely that the *'actual housing need is higher than the standard method indicates'*¹⁰².
- 8.6 Principally, the Council has identified that the method *'does not take into account the increased employment growth that is likely to result from the development of the sites that are allocated for employment development'*. These sites are integral to delivering the Council's growth strategy, which underpins the strategic policies of the PSLP. It is also noted that the Council recognises further justification for going beyond the standard method, acknowledging an *'upward pressure'* on the standard method figure on the basis of a long-term worsening of affordability.
- 8.7 Where such circumstances are acknowledged, the PPG makes clear that the impact on housing need will *'need to be assessed'* before the identified need is then subsequently translated into a housing requirement.
- 8.8 In undertaking this assessment, the Council has drawn upon two new evidence-based reports, a SHMA Update and ELNS Addendum. Both reports were published in January 2019.
- 8.9 On the basis of this evidence, the Council has derived its proposed housing requirement by selecting *'the scenario that is considered to be the most realistic'* from the evidence base¹⁰³. The selected scenario suggests that 486 dwellings per annum are

¹⁰² PPG Reference ID 2a-010-20190220

¹⁰³ St Helens Council (January 2019) St Helens Borough Local Plan 2020-2035 Submission Draft, paragraph 4.18.8

needed, with this figure directly translated into the housing requirement in Policy LPA05.

- 8.10 This does represent an elevation from the output of the standard method for St Helens (468dpa), albeit only by a modest 18 dwellings per annum or 4%. The Council implies that this modest increase will support its growth strategy, and alleviate potential affordability pressures.

The Critique of the Evidence and the Housing Requirement

- 8.11 Peel welcomes the view expressed by the Council in the PSLP that there would be disadvantages in relying only on the standard method. Furthermore, Peel strongly supports the principle of identifying the housing needed to align with the Council's commitment to economic growth, with this ambition key to the PSLP. It is also important to recognise that the growth strategy is based upon the provision of employment land within St Helens to accommodate unmet needs from the City Region (and Warrington), specifically relating to demand for logistics and warehousing space.
- 8.12 Peel agrees with the Council that the proposed growth strategy is likely to be deliverable, in accordance with the PPG. This recognises the commitment of the City Region and the Government to support the Growth Strategy through the funding and investment agreed in the Devolution Deal. At a local level, it is acknowledged that the success of the strategy is dependent upon the take-up of employment land opportunities, specifically with regards to warehousing and logistics uses. There is strong evidence of high demand for land in these sectors in the borough and the City Region as a whole, with this evidenced further within other parts of Peel's representations.
- 8.13 Peel also agrees that in arriving at an appropriate calculation of housing need, building on the standard method, the key point of consideration for St Helens is the extent to which its pursuit of a deliverable growth strategy will result in a need for housing which exceeds that associated with a continuation of past trends into the future.
- 8.14 However, the evidence in this report has identified that the proposed 4% increase from the standard method is not appropriate, and will not support the growth strategy for St Helens. The housing provision that will actually be needed to enable the growth strategy – and in particular the anticipated scale of employment growth – is considered to be notably higher, thereby requiring a more pronounced elevation from the standard method.
- 8.15 In arriving at this conclusion, the following represent key points of consideration and findings from the evidence base:
- In estimating the job growth that is likely to result from delivery of the growth strategy, the evidence base has applied a number of assumptions which collectively underestimate the full potential for employment generation over the plan period. This includes, but is not limited to, the unjustified removal of land north east of Junction 23 of the M6, which is part of Peel's land holdings. Further evidence to support the reinstatement of this site is included within other parts of Peel's representations to the PSLP;

- AMION has undertaken a critique of the Council's forecasting of job growth, and concluded that it in the order of 17,000 additional jobs could be reasonably expected in St Helens over the plan period where alternative justified assumptions are applied to those used in the ELNS Addendum. This aligns closely to the scale of job growth envisaged for the borough under the Growth Scenario in the City Region's SHELMA.
 - The SHELMA assessed the housing needed to support the Growth Scenario using a consistent approach across the City Region, and concluded that some 855 homes would be needed each year in St Helens to support such a level of job growth. This is some 83% higher than the standard method. Further modelling has been presented in this report which draws upon the latest available evidence and applies reasonable assumptions with regards to changing labour-force behaviours. This modelling serves to broadly validate this level of need, albeit identifying that it is reasonable to assume that it could underestimate the full associated need where alternative assumptions are applied in particular with regards to commuting.
 - Even where a lower level of job growth is assumed – linked to the Council's own modelling of its growth scenarios (11,967 jobs; scenario 2 used as an appropriate minimum) – the modelling indicates that considerably more than 486 dwellings per annum will be needed in St Helens over the plan period, contrasting with the conclusions of the SHMA Update. It is estimated that closer to 600 – 800 dwellings per annum would be needed even to support this more modest level of job growth; and
 - The evidence in this report has identified that the principal reason for this variation in the housing needed to support economic growth in St Helens relates to the incorrect and unjustified treatment of future commuting flows in and out of the borough within the Council's modelling. In linking housing provision with the anticipated creation of around 12,000 jobs on employment sites across St Helens, the Council's evidence base assumes that a substantial proportion of the new homes required to support economic growth are provided for outside of the borough. This position is not supported by either the current generation of emerging Local Plans in neighbouring areas, or any emerging outputs of a spatial framework for the City Region. Whilst it is accepted that it could be reasonable to anticipate some change in commuting dynamics where St Helens provides for above trend employment growth – itself linked to providing for unmet employment land needs – the implied scale of change is unsubstantiated in the evidence, and unjustified and would need to be fully considered as to its impact on other authorities in the HMA / City Region.
- 8.16 Taken collectively, the above points of critique clearly confirm that the PSLP must acknowledge that a greater need for homes will be created by its growth strategy. This must be reflected in a substantially elevated housing requirement.
- 8.17 As a minimum, the evidence indicates that the Council should consider a housing requirement which is closer to 600 homes per annum. In the context of the growth plans being pursued and the scale of associated job growth, this should be viewed as

very much the lower end of a potential range of need. The modelling has identified that in excess of 800 homes per annum could justifiably be needed where either the full scale of potential job growth is recognised or a more modest change in commuting dynamics is accepted.

- 8.18 In accordance with the PPG, it is also advised that the Council more fully considers the scale of need calculated in the SHELMA where, as noted above, a level of job growth more closely aligned with that identified by AMION was assumed to reflect a Growth Strategy for St Helens. The significantly higher derived figure in this previous assessment of housing need should form another point of consideration to take into account in setting the housing requirement.
- 8.19 It is also apparent that recent rates of delivery strongly validate that there is a high demand for housing in St Helens. Recent delivery has exceeded the figure derived from the standard method – and indeed the proposed housing requirement – by some way, lending further support to a more positive and appropriate uplift.
- 8.20 Finally, the Council has failed to take account of the scale of affordable housing need in setting the housing requirement, as required by the PPG. The Council's evidence confirms a substantial need which would not be met by a continuation of past delivery trends. The establishment of a higher housing requirement, aligned more closely to the need indicated as being required to support employment growth, would also offer significant opportunities to increase the provision of affordable housing to meet needs in full. This should be given full consideration in arriving at an appropriate housing requirement.
- 8.21 In order for the PSLP to be found sound, the Council must revisit and elevate the calculation of housing need to accord with the PPG and ensure consistency and integration across its strategic policies. This should accord with the NPPF, which confirms that a strategy – including a housing requirement – which either fails to promote sustainable patterns of growth or severely restricts economic growth would form neither a positive, nor justified, nor effective, nor national policy consistent approach.

**Appendix 1: Review of the Economic Potential
of St Helens (AMION Consulting)**

THE PEEL GROUP

REVIEW OF EVIDENCE IN SUPPORT OF IDENTIFIED HOUSING NEED

ST HELENS LOCAL PLAN

1. Introduction

This paper sets out the results of a review of the employment forecasts identified for St Helens and underpinning the Local Plan, specifically in terms of whether they are realistic and sufficiently reflective of more recent trends, the future potential for the borough and planned investment recognising the borough's growth strategy. The focus of the review has been on the St Helens SHMA Update (January 2019) and the 2019 addendum to the Employment Land Needs Study (ELNS)¹.

The review has been based on a detailed consideration of the economic evidence presented in the Council's updated evidence base and an assessment of the St Helens economy in terms of historic and potential future growth, taking into account the wider City Region and national context.

2. Overview and explanation of the approach taken in of the updated evidence base

2.1 BE Group Employment Land Needs Study – Addendum Report

The 2019 SHMA Update draws upon modelling presented in the 2019 addendum to the ELNS, which BE Group prepared on behalf of St Helens Council to provide updates and further information regarding employment land issues for the borough. The Addendum Report refreshes the original ELNS, which was prepared in October 2015. The report estimates:

- The gross number of full time equivalent (FTE) jobs that could be accommodated across the borough's portfolio of 13 proposed employment sites, drawing upon 'several pieces of evidence'. This totals circa 14,167 FTE jobs (Table 8, p15);
- The extent to which these jobs will be new to the area, or displaced. Different displacement levels are assumed for different B class uses and, in the case of one site, its specific nature (Parkside). These allowances produce a residual net estimate of around 9,300 FTE jobs (paragraph 3.7);
- The trajectory of employment growth on each site in order to estimate net jobs created to 2033 (the end of the period assessed in the SHMA Update) and beyond to 2048. This builds upon the calculations summarised above, albeit the variant phasing of individual sites means that the precise totals are not achieved in any single year. Three scenarios are modelled, to reflect:
 - Scenario 1: development as soon as possible, which would see 9,122 net additional jobs created by 2033;
 - Scenario 2: the prioritisation of sites to allow for limits on market demand and construction capacity, which assumes a 'smoother take-up' and would lead to 7,380 net additional jobs created by 2033; and
 - Scenario 3: the prioritisation of sites as above, but additionally factoring in further constraints around Junction 23 at Haydock. The longer lead-in times under this scenario would lead to the creation of 6,078 net additional jobs by 2033.

¹ BE Group (January 2019) St Helens Employment Land Needs Study, addendum report October 2017 – amended January 2019

The updated ELNS “prefers” scenarios 2 and 3, stating these are ‘the most likely for St Helens’ (paragraph 5.29). This is also referenced at paragraph 4.15 as it is suggested the assumption that they are all built out by 2033 ‘would require a significant uplift in take-up compared to past years’. It is noted that the ELNS does not rule out scenario 1 albeit this is not integrated in any of the analysis within the SHMA Update.

2.2 St Helens Borough Council SHMA Update

Table 4 of the SHMA Update directly references the outputs of scenarios 2 and 3 in the updated ELNS, as well as forecast growth in non-B class employment. This draws upon an Oxford Economics forecast from the SHELMA and additionally takes account of the multiplier effects of employment from B class sites (i.e. non-B class jobs created as a direct result of B class jobs).

Table 2.1: Jobs growth, St Helens 2016-33			
Jobs	Source	Scenario 2	Scenario 3
B Class Jobs	ELNS	7,380	6,078
Non-B Class Jobs	SHELMA	4,587	4,311

Source: ELNS and SHELMA

The SHMA Update subsequently makes allowance for commuting to estimate the resident workforce needed to fill jobs created in the borough under each scenario (Table 5). In terms of non-B class jobs, this applies a Census-derived borough-wide commuting ratio (1.21), while a different approach is taken to B class jobs, with the analysis adopted from the ELNS addendum to identify the proportion of workers residing in St Helens (Table 15, p37 – 38).

A modest adjustment for double jobbing is subsequently applied at Table 6 of the SHMA Update. The resultant job growth figures (8,272 and 7,415 under scenarios 2 and 3 respectively) form the basis for demographic modelling within the SHMA Update, which derives economic activity rate assumptions from Oxford Economics forecasts. A need for between 479 and 514 dwellings per annum is suggested under these scenarios over the period from 2016 to 2033.

Four further sensitivity scenarios are subsequently introduced, to allow for sites which ‘do not come forward for different reasons’. These options appear to originate from the ELNS addendum (Table 16, p39), and:

- Remove Omega South (1);
- Remove Omega South and land at Millfield Lane and Liverpool Road, Haydock (2);
- Remove Omega South and land north east of Junction 23 of the M6, at Haydock (3); and
- Remove all three of the above sites (4).

The sensitivities produce residual job growth of 7,486-8,417 jobs under scenario 2, and 7,114-7,537 jobs under scenario 3. The SHMA Update applies ‘the same methodology as the main analysis’ (ultimately appearing to capture all of the above adjustments) to produce unspecified figures that form the basis for further demographic modelling. These sensitivities suggest a need for between 459 and 511 dwellings per annum (2016 – 2033).

The Council’s proposed housing requirement (486dpa) aligns with one of the scenarios presented within this range. It is therefore implicitly based on scenario 2 (smoother take-up and prioritisation of key sites) and option 3, which discounts circa 700 B class jobs at Omega South and land north east of Junction 23 at Haydock.

3. Review of updated evidence base

3.1 *Potential job capacities at key employment sites*

As outlined above, the updated ELNS estimates the potential employment capacities on the key employment sites in St Helens using a range of information to calculate the total number of jobs that could be supported. This includes site characteristics, supporting documentation such as planning reports, market information, the Homes and Communities Agency's (HCA) (now Homes England) Employment Density Guide and information from comparable sites.

The ELNS does not explicitly set out the employment densities that have been applied and it is not possible to determine this for a number of the identified sites due to a lack of detail as to the mix of uses. However, if for those sites which are expected to solely come forward for B8 uses a standard developer ratio of 3,900 sqm per hectare is assumed (as per the 2015 ELNS) then this would suggest that BE Group have applied an employment density of between 84 and 132 sqm per FTE job for B8 uses. In comparison, standard B8 employment density benchmarks range from 70 to 95 sqm (GEA) per FTE job.²

Analysis of the ELNS estimates shows that the lowest employment density has been assumed for Parkside West, for which BE Group calculate that 2,531 FTE jobs will be located on the site. As part of a separate piece of work, AMION undertook a specific analysis of the development proposals for Parkside West phases 1 and 2. This suggested that the site could bring forward some 250,000 sqm of development and create approximately 3,570 FTE jobs, assuming 100% B8 use.

The possibility that the updated ELNS underestimates the amount of jobs that will be created is further supported by a review of some of the other key employment sites. For example, the Socio-Economics technical chapter prepared as part of the Florida Farm North Environmental Statement (ES) estimated that the development of the site would create 2,119 FTE jobs, compared to the ELNS estimate of 1,487. AMION's own analysis of the Parkside East site identified the potential for the site to support the creation of 3,717 FTE jobs, whereas the BE Group estimate was 2,727 FTE jobs.

It is recognised that there is a degree of uncertainty with regard to how many jobs a specific site might support, particularly over the Plan period and with future technological changes. However, it would seem reasonable to apply an average of the employment densities suggested by the HCA's Employment Density Guide. If such an approach is used for the borough's key employment sites that are expected to be purely for B8 uses, the total employment impact across all 13 sites equates to 16,279 FTE jobs, which is 2,112 more jobs than the ELNS estimate.

The alternative approach adopted within the updated ELNS of using a mix of sources to estimate the ultimate yield of employment, rather than relying on the HCA employment densities, is not unreasonable. However, it would be expected that where local or site specific data has been applied, which varies from industrial standards, this was set out explicitly for each site and the sources of this evidence cited within the ELNS.

In calculating the employment impact in relation to housing need, it is also important to take into account that one FTE job may equate to more than one actual job. It does not seem that the ELNS or SHMA update has made an adjustment to allow for this.

Experian sectoral data suggests that there is broadly a 1:1 ratio of FTE jobs to workplace (full-time and part-time) jobs for B2 uses. For B8 jobs though the ratio is approximately 1:1.1, whereas across the economy as a whole it is 1:1.3. In order to be cautious, for the purposes of this review a 1:1 ratio has been assumed for B1 and B2 uses, but a ratio of 1:1.1 has been applied to B8 sites. For those sites where there is expected to be multiple uses, it has been assumed that a third of the jobs

² HCA (2015), Employment Density Guide 2015, p.29

created will be associated with B8 employment. Based on these adjustments, the total job capacity at key employment sites in the borough would amount to 17,431 workplace jobs, using the 16,279 FTE jobs estimate (see Table 3.1).

Table 3.1: Employment capacities within key St Helens employment sites			
	ELNS/SHMA	AMION estimate*	Difference
FTE jobs	14,167	16,279	2,112
Workplace jobs	14,167	17,431	3,264

Source: ELNS and AMION

*Based on standard HCA employment density benchmarks;

3.2 Additionality adjustments

With respect to the key employment sites, the updated ELNS correctly notes that ‘some of these jobs will not be new to the area (either St Helens or new to the Liverpool City Region)’ and recognises the possibility of ‘growth in such new sites preventing growth in other businesses within St Helens’ (p.16). The ELNS therefore applies the following displacement rates:

- B1: 70% displacement
- B2: 60% displacement
- B8: 35% displacement
- Parkside East: 10% displacement
- Parkside West: 25% displacement
- Parkside Terminal: 0% displacement

In aggregate, the estimated net jobs growth reflects a displacement rate of around 34%. It is difficult though to disaggregate the displacement effect applied to each site as part of the updated ELNS due to the mix of uses and lack of clarity in terms of the number of jobs attributed to each use class.

Determining the appropriate level of displacement to apply to a given site is not straightforward and an element of subjective judgement is required. However, a review of local evidence and industry guidance indicates that there would be reason to suggest that lower displacement rates can be justified compared to those set out within the ELNS, particularly given that the adjustments are being made at the St Helens level rather than in relation to the City Region as whole.

By way of comparison, in terms of B8 uses the ES socio-economic assessment for Florida Farm North argued for 0% displacement, while AMION’s own assessment of Parkside West Phase 1 suggested a displacement rate of 10%. The ELNS displacement rates for B1 and B2 uses are also high compared to benchmarks for physical development projects, which are around 40% at the sub-regional level.³ On balance, it is thought that displacement rates of 40% for sites with a mix of uses and 10% for B8 sites would be an appropriate adjustment to make.

A further adjustment is made within the SHMA update to include ‘jobs growth multipliers’ to allow for the knock-on effects from B class employment growth on other sectors. As with displacement, adjusting for multiplier effects is in line with best practice guidance. Based on the uplift set out within the SHMA update, it would seem that a composite multiplier of 1.21 has been applied.

The SHMA update does not present any evidence to support its choice of multiplier. This may partly be due to the fact that at the sub-national level there is limited available data to accurately assess the scale of multiplier effects. A range of benchmarks are though set out within the HCA

³ HCA (2014), Additionality Guide, Fourth Edition

Additionality Guide. These include a local multiplier benchmark of 1.29 for B1, B2 and B8 uses and a sub-regional benchmark of 1.33 for interventions involving regeneration through physical infrastructure.

The effect of applying alternative displacement and multiplier assumptions is shown in the table below. Based on the estimates presented in the ELNS and SHMA, the development of the key employment sites in the borough could create a total of 11,253 net additional jobs. However, using industry standard employment density and additionality benchmarks from HCA guidance, this could in fact increase to an estimated 17,430 net additional jobs.

Table 3.2: Net additional jobs created by key employment sites in St Helens

	ELNS/SHMA – 34% displacement, 1.21 multiplier	ELNS/SHMA – 10%-40% displacement, 1.29 multiplier	AMION estimate – 10%-40% displacement, 1.29 multiplier
Gross direct	14,167	14,167	17,431
Net direct	9,300	10,644	13,511
Indirect/induced	1,953	3,087	3,918
Total net additional	11,253	13,731	17,430

Source: ELNS, SHMA and AMION

3.3 Trajectory of employment growth

The growth trajectory scenarios outlined within the ELNS have been informed by a number of factors, but the ELNS recognises that ‘such forecasts three decades into the future have a substantial level of uncertainty and should be seen as provisional and indicative only’ (p.19). While the ELNS identifies scenarios 2 and 3 as representing ‘more realistic growth trajectories for employment on the sites’, it does not explicitly dismiss scenario 1.

A further adjustment is made in the ELNS by modelling a reduction in employment numbers of the sites in the final years of the forecast period. This is attributed to efficiencies in operations and automation of processes. While it is not an uncommon view that technological change could reduce future employment densities, it is still a matter of conjecture. In the shorter-term, it may be that employment densities actually increase – the HCA Employment Density Guide states that ‘as logistics becomes more specialised both a greater number of employees and range of skills are required to operate a modern distribution facility’.⁴ This is supported by the British Property Federation’s study on the economic impact of the UK logistics sector, which points towards increasing employment densities within logistics floorspace.⁵

On balance, the ELNS scenario 2 is not considered to be an unreasonable representation of potential employment growth. However, this does not mean that scenario 1 should be ruled out and wider representations have challenged the validity of the concerns underpinning the view stated in the ELNS that scenario 1 represents a less realistic growth trajectory. It would require a significant uplift in take-up compared to past years, but take-up has been constrained by a lack of adequate market supply, as noted by the ELNS itself.

Scenario 1 can also be seen as more reflective of the City Region’s growth ambitions. The Liverpool City Region Growth Strategy sets out the ambitions for growth within the City Region over the next 25 years. This includes the creation of over 100,000 additional jobs by 2040, a net increase of 20,000 businesses over the next 25 years and a near doubling of the economy to £50b billion by 2040.

⁴ HCA (2015), Employment Density Guide 2015

⁵ BDF (2015), Delivering the Goods: The economic impact of the UK logistics sector

Logistics is established as a key growth sector within the Strategy, with a number of opportunities for the sector, such as the expansion of the port, including in-river infrastructure and land availability, and enhanced facilities and improved infrastructure to increase capacity aligned to the ports Master Plan. The Strategy highlights the vision for the Liverpool City Region to be the Global Logistics Hub for Northern UK. The development of logistics sites will play a crucial role in meeting this vision and fulfilling demand generated from increased port based freight associated with the SuperPort vision.

The separate review by AMION of the Objectively Assessed Need for employment land, also submitted as part of representations on the Local Plan, identifies the strong level of growth in the logistics sector between 1998 and 2008, as well as the relatively strong performance of the local economy as a whole over this period when land supply was less constrained. This highlights the potential scale of growth that could be achieved within St Helens through the delivery of the Council's employment land strategy, particularly in sectors such as logistics which has recently seen high levels of employment growth. If scenario 2 is treated as the "central scenario", but the uplifted employment estimates set out in Section 3.2 are applied on a proportional basis, then the number of net additional jobs created by 2033 could increase to 13,831 once an allowance has been made for multiplier effects. Under scenario 1, the total number of jobs created by 2033 would rise to 17,096.

Table 3.3: Net additional B class jobs created by 2033 – scenario 2

	ELNS/SHMA	AMION estimate
Net direct – B class	7,380	10,722
Indirect/induced employment	1,569	3,109
Total net additional	8,949	13,831

Source: ELNS, SHMA and AMION

An additional point to note is that the 2018 to 2033 growth projections set out within the updated ELNS have been applied to the period 2016 to 2033 in the SHMA update. The SHMA therefore excludes 2-years of growth in terms of B class jobs. According to the most recent ONS BRES data, manufacturing and logistics (transport and storage) employment in St Helens remained broadly constant between 2016 and 2017. However, employment in professional, business administration and support services grew by around 2,500 jobs. Arguably, an element of this growth should be included in the ELNS and SHMA estimates in order to take into account the full Plan period.

3.4 Estimate of growth in the resident labour-supply required to ensure the forecasts jobs are filled

As noted in the updated ELNS, approximately 60% of workers in St Helens also live within the borough. However, the ELNS also rightly highlights that commuting is not uniform within St Helens. For example, a number of the large logistics sites are located on the edge of the borough boundary, next to the motorway network, which is likely to lead to a greater proportion of workers coming from outside of St Helens. It should though be recognised that, as part of the planning process, it is likely that many developments will be encouraged to put processes in place to help maximise the employment of local people.

From the figures outlined in the ELNS, it seems that BE Group has broadly assumed that 40% of additional workers by 2033 will reside in St Helens. This is not considered to be unreasonable, based on the evidence presented. However, the SHMA update simply takes this adjustment to estimate the number of additional residents that would be needed for all of the B class jobs to be filled. This neglects to also allow for the fact that not all residents in St Helens work in the borough – Census data shows that approximately 50% of St Helens residents work outside of the borough. The presentation of the figures in the SHMA is somewhat confused by Table 5 being labelled 'Estimate of number of jobs filled by residents of St Helens' when it seems that the analysis is actually seeking to

calculate how many new residents there would have to be in St Helens for the jobs created to be filled.

As a result of the error made in the SHMA, there is an inconsistency between how B class and non-B class jobs are adjusted, with an overall commuting ratio of 1.21 applied to non-B class jobs in line with commuting patterns from 2011 Census data. In contrast, the SHMA effectively applies a commuting ratio of 0.4 to B class jobs, which results in an overall commuting ratio (B class and non-B class) of around 70% being assumed. This would represent a significant change to the ratio of commuting in the borough which has not been adequately justified in the Council's evidence or considered in the context of its impact on other authorities which share commuting relationships.

3.5 *Exclusion of key employment sites*

One of the important determining factors in the reduced scale of forecast job growth in the SHMA update is the decision taken in the evidence to remove specific sites from the process of forecasting job growth (see section 2.2 above). An additional overview has been undertaken to explore the asserted rationale for this approach.

The SHMA Update suggests (paragraph 4.17) that 'BE Group has considered alternative St Helens employment scenarios where particular sites do not come forward for different reasons'. In reality, when looking at the BE Group ELNS this simply states that 'BE Group has considered alternative St Helens employment projections in line with the request to consider scenarios where particular sites do not come forward' (paragraph 5.24). Neither the ELNS nor SHMA Update sets out a clear justification for particular sites not coming forward.

Looking at the sites in turn:

- EA1 (1EA in the Submission Draft) Omega South – this site is proposed for allocation within the Plan but it is identified as being included to meet unmet needs for employment land arising in Warrington (See Table 4.1 of the Submission Draft and paragraph 4.12.15), which is implied as the reason for its removal as part of the sensitivity testing presented in the SHMA Update. Nevertheless, in reality a reasonable proportion of the jobs created on the site will be taken up by residents in St Helens, based on existing commuting patterns and therefore have direct implications in terms of future housing need in the borough.
- EA7 (6EA in the Submission Draft) Land at Millfield Lane – this site is allocated (see Table 4.1). It is noted that this is subject to existing planning permission granted in April 2017 (see footnotes 15 and 17 of the Submission Draft). It is not clear why this is included in the Council's exercise with no indication in Appendix 1 to the Submission Draft but it is not taken out in the SHMA Update's preferred scenario.
- EA4 (2ES in the Submission Draft) Land north east of Junction 23 of the M6, at Haydock – this site is identified for safeguarding (i.e. development post the plan period). The reason for safeguarding as opposed to allocation, and therefore its removal as part of the SHMA sensitivity testing, is linked to a perceived need for clarity on enhancement work required to M6 Junction 23. It is understood that this is being challenged in the representations, with The Peel Group confirming that a solution exists. Equally the Council is also suggesting through the calculation of the employment land need figure (noting this is based on past take-up as opposed to an economic forecasting approach) that the site is not required (this is also referenced on page 48 of the December 2018 Green Belt review).

The updated ELNS identifies a requirement for the provision of 190 – 239 ha of employment land in St Helens over the period 2012-2037. AMION's separate review of the Objectively Assessed Need for employment land has come to the view that a more appropriate figure for future employment

land provision would be 280 – 290 ha. This challenges the Council's position that site EA4 (Land north east of Junction 23 of the M6, at Haydock) is not required.

It is also of note that the Green Belt Review (December 2018) confirms in relation to site EA4 (referred to as Parcel GBP-033) that *'there is also strong evidence of developer interest in providing employment uses on these parcels, including the sub-regional demand for logistics uses (for which a current shortage of market-attractive sites has been identified). A strategic aim of the emerging Local Plan is to provide sufficient land to meet local employment land needs in full, by focusing new employment development on large sites in close proximity to the strategic road network of the M6 and M62'*. (paragraph 4.5 of the Green Belt Review).

Taking the above into account, it is not considered that a strong rationale exists for removing site EA4 from the forecast jobs growth calculations. Similarly, there is no clear justification presented within the SHMA Update for removing site EA7 and site EA1 would still be expected to have direct implications in terms of future housing need in St Helens even if it forms part of Warrington's employment land supply in the revised Warrington Local Plan.

4. Conclusion

It is correct and welcome that the overall approach presented by the Council in the updated ELNS and SHMA takes into account the likely impact of delivering the borough's portfolio of proposed employment sites in order to understand the implications for other strands of the Plan. However, a number of the assumptions applied in the ELNS and SHMA to calculate forecast jobs growth over the Plan period lack sufficient justification and strongly suggest that the full employment impact of the Council's employment land strategy is being underestimated.

The review of the employment forecasts for St Helens and underpinning the Local Plan has identified a number of areas where a greater level of jobs growth can be identified. Table 4 of the SHMA Update estimates that the total growth in net additional employment in St Helens between 2016 and 2033 will amount to some 11,967 jobs. The analysis undertaken as part of this review, however, shows that making reasonable adjustments to some of the assumptions set out within the ELNS and SHMA can result in employment growth of 16,849 net additional jobs – this represents the net additional B class jobs created (see Table 3.3) and the baseline forecast non-B class jobs growth identified in the SHMA Update.

It should be noted that the AMION estimate in Table 4.1 is reflective of the SHMA/ELNS scenario 2 employment trajectory in that it assumes the number of jobs created by 2033 as a proportion of the total number of net additional jobs that could be created on the employment sites is the same (79%). A higher rate of growth, as shown by scenario 1, would obviously further increase the number of jobs created over the Plan period.

Table 4.1: Net additional jobs created by 2033 – scenario 2		
	ELNS/SHMA	AMION estimate
Net direct – B class	7,380	10,722
Net direct – non-B class	3,018	3,018
Indirect/induced employment	1,569	3,109
Total net additional	11,967	16,849

Source: ELNS, SHMA and AMION

As part of this review, consideration has also been given to the impact of extending the plan period from 2016 to 2033 (as considered in the evidence base) to 2016 to 2035. Under the ELNS/SHMA

scenario, this could increase jobs growth from 11,967 to 12,754. With regard to the AMION estimate, jobs growth would increase from 16,849 to 17,872.

In terms of the exclusion of key employment sites, it is considered that the exclusion of EA1 Omega South risks underplaying the potential housing need in the borough, given its location. Moreover, the rationale for excluding site EA4 (land north east of Junction 23 of the M6, at Haydock) and site EA7 (land at Millfield Lane) is not presented within the SHMA or ELNS. As set out above, in relation to site EA4 The Peel Group has confirmed that a solution exists to the perceived need for clarity on enhancement work required to M6 Junction 23, meaning there is not a clear justification for the site's removal.

Whilst on the basis of the lack of evidence in the updated ELNS and SHMA, and reflecting the evidence submitted as part of the wider representations, the rationale for the sensitivity scenarios is challenged, sensitivities on the AMION estimate have nevertheless been provided to aid comparisons with the analysis presented within the SHMA Update.

Table 4.2: Net additional jobs created by 2033 – scenario 2, sensitivity scenarios

	AMION estimate – exclude EA1	AMION estimate – exclude EA1 and EA4	AMION estimate – exclude EA1, EA4 and EA7
Net direct – B class	10,112	8,800	8,112
Net direct – non-B class	3,018	3,018	3,018
Indirect/induced employment	2,932	2,552	2,352
Total net additional	16,062	14,370	13,482

Source: AMION

AMION Consulting
7th March 2019

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Turley

Policy LPA05
SHLAA

**St Helens Borough Local Plan 2020-2035
Submission Draft**

EL0228_21-
22

Representations Report – Peel Holdings (Land
and Property) Limited

(Other points
picked up in
Summary rep
Paper 1)

Paper 3: Assessment of housing land supply

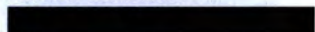
March 2019

Turley

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Andrew Bickerdike



Client

The Peel Group

Our reference

PEEM2091

March 2019

1. Introduction

- 1.1 This report presents a technical review and critique of the strategy advanced to date by St Helens Borough Council within the Proposed Submission Draft Local Plan (PSLP) with regards to the supply and delivery of sites relied upon to meet the housing requirements of the PSLP. It is presented alongside three other papers which together comprise Peel Holdings (Land and Property) Ltd'S ("Peel") submission to the PSLP consultation and which should be read in parallel:
- Paper 1: Overarching representation
 - Paper 2: Assessment of housing requirements
- 1.2 The objective of Paper 2 is to assess the proposed annual housing requirement as set out in the PSLP. Together, Paper 2 and 3 enable the extent of any shortfall in the overall housing land provision to be identified through combining a consideration of the requirement and the extent to which the identified supply is sufficient to meet the plan's proper housing requirements. This combined assessment is presented in section 4 of this paper.
- 1.3 The PSLP identifies a housing requirement of 9,234 net additional dwellings for the plan period 2016-2035, which equates to 486 dwellings per year. Policy LPA05 of the PSLP allocates 10 sites for housing development with an overall estimated yield of 4,085 dwellings within the Plan period. These sites have an assumed total capacity of 7,040 dwellings, though 2,955 of these units are expected to be delivered beyond the Plan period and so do not contribute to the housing requirements of the plan.
- 1.4 In addition to these allocations, the PSLP is reliant on a number of other sources of supply to deliver the overall requirement, including:
- Sites identified as developable within the SHLAA 2017 to 2032, including a mixture of sites with and without planning permission;
 - An additional supply to cover the last three years of the plan (2032 to 2035) derived from delivery at one SHLAA site which will not be delivered in full during the 15 year time horizon of the SHLAA.
 - Completions between 2016 and 2017
 - A small sites / windfall allowance
- 1.5 Based on the above sources, the total supply claimed by the Council over the plan period is calculated (by Peel) as 10,362 units. Nowhere does the Council explicitly outline the total supply on a clear basis. Of this supply, 2,056 units will be delivered through the release of sites currently in the Green Belt.
- 1.6 The PSLP identifies named Key Settlements as being the focus for sustainable regeneration and growth. Those areas identified as Key Settlements include St Helens Core Area, Blackbrook and Haydock, Newton-le-Willows and Earlestown, Rainford,

Billinge, Garswood and Rainhill. Emerging Local Plan Policy LPA02 confirms that the re-use of previously developed land (PDL) in Key Settlements will remain a priority with a substantial proportion of new housing throughout the Plan period being delivered on such sites. To achieve this, lower thresholds for developer contributions on previously developed sites will be set to reflect the higher costs and lower sales values associated with redeveloping PDL sites.

1.7 Upon review of the PSLP, the housing requirement and supply which the Council is reliant, it is Peel's position that the PSLP is unsound insofar as:

- It does not seek to meet the objectively assessed need for housing in the Borough. The plan is not positively prepared as a result and does not accord with the NPPF;
- It does not identify a sufficient developable supply of land to meet the plan's proper housing requirements. The plan is not positively prepared as a result and does not accord with the NPPF;
- It is not sufficiently flexible to account for changes in circumstances and respond to fluctuations in market demand and provide for choice and competition in the market. The plan is not deliverable and is thus not effective.

1.8 The remainder of this report is structured as follows:

- **Section 2: Spatial Strategy** – a summary and review of the proposed spatial distribution of development and the resultant impact on delivery of market and affordable housing;
- **Section 3: Housing Land Supply** – A review of the proposed supply of housing land including a review of the deliverability and developability of housing allocations and the risks of relying on the delivery of small sites;
- **Section 4: Additional housing land requirements** - taking section 3 and the findings of Paper 2, identification of the extent to which there is a deficit in the overall requisite housing land supply requirement
- **Section 5: Conclusion** – the analysis is drawn together to highlight the potential risks associated with the strategy.

2. The impact of spatial distribution on the deliverability of the housing requirement

- 2.1 The Keppie Massie Economic Viability Assessment ('EVA') was published for consultation in December 2018 and provides evidence to support the Council's PSLP policies relating to new development in St Helens.
- 2.2 Paper 1 highlights a number of matters of concern in respect of the robustness of the EVA to support the PSLP. It is Peel's considered view that the EVA unrealistically overstates the financial viability of development sites tested.
- 2.3 The submitted written representations seek amendments to the input assumptions utilised within the EVA testing in order to rectify these issues. The recommended amendments to the EVA appraisal input assumptions will have the impact of demonstrating a reduction from the level of development viability presently reported in the EVA across the three established spatial 'zones' (i.e. areas of differing market value) of St Helens.
- 2.4 PSLP Policy LPA01 references 2,223 units as being targeted for delivery as affordable housing in order to contribute towards meeting identified housing need over the Plan period. This represents 24% of the overall minimum total dwelling supply requirement set out within PSLP Policy LPA05.
- 2.5 Looking solely at development viability, Peel has identified that many of the sites within the supply are situated within locations across St Helens which the Council's published EVA determines as being unable to viably deliver new build residential development.
- 2.6 The EVA generic site testing presents the results of site viability testing on the basis of three spatial 'zones', as previously referenced. The EVA concludes that:
 - Zone 1:
 - Brownfield development is unviable at a build density of 30 dwellings per hectare (dph), 35dph and 40dph.
 - Greenfield development is unviable at 30dph, marginal at 35dph and marginal at 40 dph (when Section 106 planning obligations sought via the PSLP policies are taken into account).
 - Zone 2:
 - Brownfield development is unviable at 30dph, marginal at 35 dph and modestly viable at 40 dph. It is not viable to provide any affordable housing on such sites.

- Greenfield development is modestly viable at 30dph with 20% of units provided as on-site affordable housing and viable at 35dph with 30% provision of affordable housing.
- Zone 3:
 - Brownfield development is mostly viable at 30dph with 10% of units provided as on-site affordable housing and viable at 35 dph with 10% provision of affordable housing.
 - Greenfield development is viable with 30% of units provided as on-site affordable housing.

2.7 In order to analyse the implications of this for the deliverability and viability of the land supply established to meet the policy requirements set out in the PSLP, Peel has mapped and then organised the SHLAA and allocated sites into the EVA zones in which they are actually located. This is set out in the following table.

Table 2.1: SHLAA & Allocated Sites – Implications for Viability of Identified Supply

Zone	Greenfield / Brownfield	Number of SHLAA Sites	SHLAA Sites: Total Unit capacity	No of Allocated Sites	Allocated Sites: Total Unit Capacity	Total Sites	Total Site Capacity	Affordable Housing Provision: (%) of Total Units	Affordable Housing Provision: Total Units
1	Brownfield	24	2,162	0	0	24	2,162	0%	0
1	Greenfield	1	12	0	0	1	12	0%	0
1	PDL/GF	6	147	0	0	6	147	0%	0
Zone 1 Total		31	2,321	0	0	31	2,321	0%	0
2	Brownfield	29	3,871	0	0	29	3,871	0%	0
2	Greenfield	15	611	5	1,797	20	2,408	30%	722
2	PDL	2	18	0	0	2	18	0%	0
2	PDL/GF	12	740	0	0	12	740	15%	111
Zone 2 Total		58	5,240	5	1,797	63	7,037	12%	833
3	Brownfield	7	358	0	0	7	358	10%	36
3	Greenfield	1	11	1	259	2	270	30%	81
Zone 3 Total		8	369	1	259	9	628	19%	117
Grand Total		97	7,930	6	2,056	103	9,986	10%	950

Source: Turley analysis

- 2.8 In respect of overall supply, the analysis demonstrates that 2,321 units from the identified residential land supply required to deliver the PSLP are located on sites within EVA Zone 1. As mentioned previously, the EVA concludes that residential development is unviable at the build densities tested. This immediately brings into question the extent to which the developable supply can be relied upon to deliver the PSLP's housing requirements.
- 2.9 The analysis also applies the affordable housing target set out within PSLP Policy LPC02: Affordable Housing to the sites within each zone¹. This demonstrates that the maximum delivery of affordable housing from the SHLAA and allocated sites will equate to 950 units, which falls 1,273 units below the proposed volume of affordable housing provision within PSLP Policy LPA01 (of 2,223 units), albeit it is noted that 2,223 units represents the total affordable need, some of which will be delivered directly by registered providers rather than solely through Section 106 Agreements associated with market housing schemes.
- 2.10 Notwithstanding this, market housing schemes will make only a very limited contribution to meet the affordable housing requirement given the prevailing market conditions and the concentration of sites within more marginal housing market areas. This will undoubtedly increase the level of affordable housing need within St Helens, and place greater pressure on the existing stock of affordable housing.
- 2.11 Resolving this and utilising the existing identified supply of SHLAA and allocated sites would necessitate the Council significantly increasing the affordable housing target for sites located within Zones 2 and 3. However, the results of the EVA indicate this would represent an unrealistic proposition. The alternative is to implement an alternative spatial distribution such that development in Zones 2 and 3 is increased as a proportion of the whole.
- 2.12 Further, Peel's analysis also notes that whilst the SHLAA and allocated sites are spread across 16 Council ward areas, with delivery on each ranging from 29 to 1,947 units, four wards each include in excess of 1,000 units over the plan period.
- 2.13 Reflecting on a sensible rate of market construction and sale, delivery of more than 1,000 units is likely to require multiple sales outlets operating at a time over the plan period, raising concerns in respect of the level of market competition which may occur between sites.
- 2.14 Delivery of new build units in close proximity to competing sites is viewed with caution by national house builders, especially in locations where viability is marginal, particularly, in this case, Zone 1. It may be difficult to encourage developers to operate in close competition, and sales rates will slow in comparison to locations where only one outlet is in operation. This will also result in a further challenge to the ability of the

¹ Note: It is assumed that the designated PDL/GF SHLAA sites comprise 50% greenfield land and 50% brownfield land as an estimate. PSLP Policy LPC02 is unclear on how such sites will be treated in respect of affordable housing provision. As a proxy, for the purposes of Turley's analysis, 15% affordable provision is applied on PDL/GF sites in Zone 2, rather than 30%, to reflect the mixed existing land use.

identified land supply to deliver the minimum housing requirement set out in PSLP Policy LPA05.

- 2.15 It is Peel's considered view that if the Council is to deliver the minimum housing requirement set out in PSLP Policy LPA05 and also meet the affordable housing target set out within PSLP Policy LPC02, it will be necessary for a wider range of sites to be identified and allocated within higher value zones. Failure to do so will place the delivery of the Local Plan at risk. This is not to suggest that sites in Zone 1 should not be supported by the plan, but rather to ensure delivery of the housing requirement and an adequate supply of affordable housing, there will need to be a significant 'top up' of the total supply, reflecting the heightened risk of under delivery in Zone 1.

3. The developable housing land supply

Components of Supply

- 3.1 The PSLP identifies a housing requirement of 9,234 net additional dwellings for the plan period 2016-2035, which equates to 486 dwellings a year.
- 3.2 Peel has interpreted the Council's position in respect of the housing land supply upon which the PSLP is reliant as follows:
- SHLAA sites 2017 – 32: 6,287 units
 - SHLAA sites which will continue to deliver after 2032: 135 units
 - Delivery between 2016 and 2017 – 489 units
 - Small sites allowance 2017 – 32 – 1,395 units
 - Green Belt releases – 2,056 units
- 3.3 The Council's claimed supply is therefore 10,362 units against a requirement of 9,234. As noted above, this is Peel's interpretation of the Council's position based on review of the SHLAA and PSLP. This is not itself explicitly set out in one place. Table 4.6 of the PSLP attempts to present this calculation but is somewhat difficult to interpret.
- 3.4 The Council accepts the need for a supply which exceeds the requirement (in this case equating to 12% over supply against the requirement) due to risks of non-delivery from year 6 of the plan onwards.

Assessment of supply

a) Flexibility requirement

- 3.5 The Local Plans Expert Group² (LPEG) sets out a clear recommendation that Local Plans should make provision for, and provide a mechanism for the release of, developable 'reserve sites' equivalent to 20% of their housing requirement. Taking this approach, the 12% calculated uplift is inadequate. With a 20% requirement, the total land supply needed would be 11,081 units based on the PSLP housing requirement, some 719 units more than the supply identified by the Council.
- 3.6 In assessing this issue and the extent to which the developable supply can generally be relied upon to translate to homes on the ground, the historic performance of the Borough in respect of housing delivery is a relevant consideration. Delivery of homes in St Helens since 2007/08 has been below the housing requirement included in the Core Strategy in all years but 2 years (2014/15 and 2015/16). The Core Strategy requires 570 dwellings per annum. Between the period 2003 - 2017, a total of 6,656 net dwellings have been delivered, which is an average of 475 per annum, representing an annual average shortfall against the Core Strategy requirement of 95 dwellings.

² Report to the Communities Secretary and to the Minister of Housing and Planning, Local Plans Expert Group (March 2016)

- 3.7 This persistent record of under delivery of housing serves to reinforce the conclusion that the Council's trajectory should be viewed with caution and appropriate flexibility provisions incorporated into the plan to safeguard against a failure of the land supply to deliver the residential units needed.

b) Delivery of Small Sites

- 3.8 The methodology for the SHLAA 2017 confirms that sites above 0.25ha, or those that are below the threshold but will deliver five or more units were assessed and the yield based on a density applied on a site by site basis.
- 3.9 A windfall allowance for sites below this threshold have been applied as St Helens have shown by the completions data that sites below 0.25ha have consistently become available and will continue to be a reliable source of supply. A windfall allowance for large sites above 0.25ha has not been included.
- 3.10 The small sites average completions data between the period 2007/08 and 2016/17 equates to 93 units per annum. The average completions on sites below 0.25ha as a percentage of the total net completions is 22%.
- 3.11 The SHLAA 2017 Update confirms:
- "Therefore it is considered reasonable that small sites will continue to be delivered in the Borough throughout the Local Plan period and a reasonable allowance of 93 units per annum for delivery on small sites should be included, totalling 1395 units over 15 years."*
- 3.12 The total of 1,395 units included as a windfall allowance within the supply equates to 15% of the Council's annual housing requirement.
- 3.13 Paragraph 68 of the NPPF makes reference to the important contribution that small and medium sized sites can make to meeting the housing requirement and reference is made to the fact they are often built out quickly. The paragraph sets out a requirement that land to accommodate at least 10% of the housing requirement on sites no larger than one hectare should be identified through development plans and brownfield registers.
- 3.14 The Housing White Paper (February 2018) first introduced a target for small sites specifically with a view to encouraging opportunities for SME and custom builders. However, it must be recognised that the resources of such developers and their capacity to deliver a high rate of completions is limited. This is particularly the case in St Helens where developments must be of sufficient size or density such that they have the critical mass required in order to be viable on brownfield sites.
- 3.15 Examination of the sites within the SHLAA confirms that of the 98 residential sites in the trajectory, 54 are smaller than one hectare, which is equivalent to 55% of sites.
- 3.16 The potential yield of sites within the SHLAA that are below 1 hectare in size is 1,060 dwellings, equivalent to over 11% of the total PSLP supply.

- 3.17 Therefore the windfall sites and medium range sites identified within the SHLAA equates to c24% of the total supply (2,455 dwellings) or 26% of the PSLP requirement. It is therefore clear that the estimated yield from small sites and windfalls goes far beyond the requirements established within the Framework.

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- 3.18 The strategy for allocating sites must be rethought with greater emphasis on the identification and allocation of larger sites in higher value market areas in order to ensure that the required level of market and affordable housing will be delivered. Peel considers that a reduction in the reliance on small and medium sites from 26% of the requirement to 15% would be appropriate, equating to 1,385 units against the PSLP requirement. If the PSLP housing requirement remained at 9,234, this reduction would mean a requirement to identify additional large sites to deliver 1,070 units.
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- 3.19 Clearly if the requirement were to be increased, the small/windfall sites allowance may be appropriate at its current level of 93 units per year over 15 years if this were to equate to 15% or less of the adjusted requirement.

c) Review of individual sites

- 3.20 The PSLP has allocated 10 sites for housing development within the Borough which are anticipated to deliver 4,085 dwellings across the Plan period. A housing Development Trajectory is included at Appendix 5 of the SHLAA 2017 Update which considers yield from the extant urban land supply as separate from the allocations (albeit some sites are both allocated in the PSLP and included in the SHLAA).
- 3.21 The assumptions within the Development Trajectory have been assessed by Peel using the information provided within the site assessments, planning history, Sustainability Appraisal, Green Belt Review and Brownfield Land Register. The assumptions have been considered against the definitions for deliverable and developable included within the NPPF.
- 3.22 Paragraph 67 of the NPPF requires that LPA's should identify a supply of:
- specific, deliverable sites for years one to five of the plan period; and
 - specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- 3.23 Paragraph 73 requires strategic policies to *"include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites"*.
- 3.24 The same paragraph also requires local planning authorities to *"identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies"*.
- 3.25 The Glossary to the revised NPPF provides a definition of 'deliverable' which requires that;

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

- 3.26 The Glossary to the NPPF also provides a definition of 'developable' which requires that *"To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged"*.
- 3.27 The Planning Practice Guidance (PPG)³ requires *"strategic policy-making authorities will need to provide robust, up to date evidence to support plan preparation. Their judgments on deliverability of housing sites, including windfall sites, will need to be clearly and transparently set out"*.
- 3.28 A full review of individual sites identified by the Council as part of the supply has been undertaken to consider whether each can reasonably be considered to be developable, having regard to the NPPF definition and, in respect of sites which Peel would agree to be developable, whether the assumed yield is appropriate. As part of this exercise Peel has also assessed the five year supply and whether a five year supply of deliverable housing land will exist upon adoption of the plan.
- 3.29 The review of sites has identified several areas of concern; these are discussed within the remainder of this chapter. This should be read in conjunction with the Table included in Appendix 1 of this Report which provides detailed findings.

Previous land uses and desirability

- 3.30 A number of sites have been removed from the Development Trajectory by Peel based on evidence which would indicate that previous land uses are likely to present significant abnormal costs in preparing the site for development and, in the context of their location in otherwise marginal or unviable housing zones as identified through the Keppie Massie study, this would render development unviable.
- 3.31 Similarly, in a number of cases, where sites have unfavourable, noisy or contaminative neighbouring land uses the sites are not considered to be a suitable or desirable location for development, able to attract housebuilder interest and have been removed from the supply. Again this is particularly relevant where sites are in unviable or marginal market areas where additional constraints of this type are likely to prevent

³ Paragraph: 030 Reference ID: 3-030-20180913

a viable scheme from being developed. A freight railway line, 24 hour delivery depot, derelict commercial buildings, landfill and cement works are examples of neighbouring land uses that affect site deliverability.

Access constraints

- 3.32 Peel's review has highlighted a small number of sites that have clear access constraints. This includes sites which evidently require third party land, or the purchase and demolition of a property, in order to achieve a viable access. St Helens Council has provided no evidence as to how the access issues on these sites are to be resolved, with no evidence that there has been any engagement with the controlling land owners and thus that there is an in principle commitment to resolving these issues. There is insufficient certainty that these constraints can be overcome during the plan period. As such these sites should not be counted as part of the developable supply at this time.
- 3.33 Peel's review of the supply has identified five sites which should be discounted on this basis.
- 3.34 In addition to this, several other sites in the supply are identified by the Council as having access constraints which require further evidence to demonstrate that the site would be able to be viably developed at the point envisaged, although it is claimed that there is evidence to suggest that an access may be possible. For similar reasons, Peel does not agree that there is a sufficient level of certainty that these constraints can be overcome to the extent that they can be included within the developable supply.

Stalled Sites

- 3.35 The Council has included several sites which have already obtained planning permission within its trajectory. Six of the sites included within the Development Trajectory are currently considered to be stalled or the permissions have expired. Several of these sites have commenced limited works on site in order to implement the permission and thus safeguard the consent. Subsequent to which the sites have not been progressed. That a developer or landowner would not proceed to implement a development for which planning permission exists is a clear indicator of constraints to delivery, be it in market/viability, environmental or ownership/legal issues.
- 3.36 In respect of such sites, Peel does not agree that there is a sufficient level of certainty that these constraints can be overcome to the extent that they can be included within the developable supply.

Ownership / Occupation

- 3.37 The Council has identified a significant number of sites as deliverable within five years, but which are still in the hands of private landowners or occupied by existing businesses. In order to be developed these sites will need to be marketed, sold, planning applications prepared and submitted, planning obligation agreements signed, conditions discharged, and enabling infrastructure delivered. These sites should therefore not be considered deliverable, but potentially developable (assessed on a case by case basis).
- 3.38 Similarly, where there is no evidence that an existing use is to be relocated, or has the intention of moving to a different premises it cannot be considered to have a

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reasonable prospect of being available within a 15 year period. SHLAA Site 129 for example, is considered developable only when the community centre becomes surplus to requirements. With no evidence to suggest the community centre will relocate or be replaced the site cannot be considered developable.

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- 3.39 The Council has also identified a number of sites where ownership details are unknown – that is to say the site owner has evidently not engaged in the plan making process or endorsed the Council's conclusion that the site can come forward for housing. In respect of such sites, Peel does not agree that there is a sufficient level of certainty that the site is or will be available to the extent that they can be included within the developable supply.

Trees and Ecology considerations

- 3.40 The potential yield of a small number of sites has been reduced because of the tree cover on site. As many of the sites within the Development Trajectory are brownfield land that's been vacant for a considerable number of years there is considerable vegetation and tree growth across many of the sites. Where the sites appear to have a considerable amount tree coverage the developable are has been recalculated to take account of their retention and protection.

Planning Permissions

- 3.41 A large number of sites have planning permission for a reduced site capacity than that indicated as being the site capacity within the SHLAA 2017. Where this information is available we have reduced the site capacity to reflect the up to date planning permission.

Summary

- 3.42 The individual assessment of sites at Appendix 1 presents Peel's considered view as to whether the sites within the Development Trajectory can be considered deliverable or developable and the level of affordable housing they will be able to provide. The assessment has used the Council's evidence base documents and planning history to provide a planning judgement on each site.
- 3.43 This identifies that there are several sites which are currently within the Development Trajectory which do not meet the NPPF definition of being developable or for which the yield over the plan period should be reduced. Taking these adjustments into account reduces the Council's assumed developable supply (SHLAA sites only) over the plan period from 6,422 to 5,610 representing a reduction of some 13% (812 units).
- 3.44 Peel therefore assesses the current housing supply from specific identified sites within St Helens to comprise:
- 2,056 units on allocated sites removed from the Green Belt (assumed by Peel to be developable for the purposes of this exercise).
 - 489 units completions between 2016 and 2017
 - 5,610 units from the SHLAA sites between 2017 and 2032, including delivery of a further 135 units to 2035 from a single SHLAA site (site 111).

- 3.45 The resultant realistic developable supply is 8,155 units, plus any reasonable allowance for small/windfall sites. By contrast, the Council has identified a supply of 8,967 units from the above sources (again excluding windfall/small sites allowance).

d) Delivery of affordable housing

- 3.46 The delivery of affordable housing within St Helens has been considered previously within this report. The review of the housing trajectory has confirmed that affordable housing has broadly been delivered at the emerging affordable housing policy requirement rate on major sites. A review of the amount of affordable housing proposed on sites with planning permission in the SHLAA suggests that there are a number of sites which, for viability reasons, have not provided affordable housing. It would appear that, because of the large number of brownfield sites, the Council currently secures the delivery of affordable housing on a case by case basis by reference to prevailing viability evidence provided by applicants.
- 3.47 The review of the housing land supply has also sought to estimate the level of affordable housing which is likely to be delivered across the plan period. This work has identified that based on the sites which are deemed 'developable' as part of the Turley assessment, only **912** affordable dwellings could potentially be delivered across the plan period applying the emerging policy requirement and reflecting on affordable units secured through Section 106 Agreements in respect of those sites which already have planning permission. This equates to approximately 65 affordable dwellings per annum. The total of 912 affordable units falls 1,311 units below the proposed volume of affordable housing provision within PSLP Policy LPA01 (of 2,223 units).
- 3.48 This represents an adjustment to the figure presented in section 2 of this report to reflect that Peel does not consider some sites to be developable or are developable at a reduced need. Whilst it is acknowledged that affordable housing will also be delivered by registered providers (i.e. not just via Section 106 obligations tied to market housing schemes), it is evident that the portfolio of sites which the PSLP is reliant on will deliver only a limited level of affordable housing relative to the identified need.

4. Residual housing land requirements

- 4.1 Taking the findings from the preceding sections, and informed by the findings of Peel's Paper 2 submission, it is possible to identify how much additional housing land the Council will need to identify and support through the Local Plan in order to deliver its housing requirements over the period 2016 to 2035.
- 4.2 The assessment above has made a case that:
- a) The overall requirement over the plan period should be uplifted by 20% to allow for flexibility and to safeguard against under delivery
 - b) Small and medium sized sites should account for no more than 15% of the total requirement
- 4.3 Peel's assessment has demonstrated that the developable supply sites totals 8,115 units, rather than 8,967 assumed by the Council (excluding a small sites/windfall allowance). This is not to say that those sites which Peel does not consider to be proven to be developable, having regard to the NPPF definition, should not be supported by the plan, but rather that there is a significant level of doubt as to whether they will come forward over the plan period. A cautious approach is therefore needed to ensure, collectively, the portfolio of sites selected for development can deliver the full requirement. There is a quantitative and qualitative dimension to this.
- 4.4 This uncertainty is mitigated through including a full 20% flexibility allowance within the requirement. The extent to which there are questions over the reliability of the developable supply would support the view that St Helens needs to make provision for a 20% flexibility allowance. It is accepted by Peel that adding a 20% uplift to the requirement and then discounting the supply by 812 units based on the assessment undertaken would be double counting. The preferred approach is therefore to simply increase the requirement by 20%.
- 4.5 The resultant additional land requirement is presented comprehensively in Table 4.1 below.

		PSLP	Peel adjusted
NEED			
a)	Overall housing requirement	9,234	11,400 ⁴
b)	Buffer for flexibility/non-	1,128 (12%) ⁵	2,280 (20%)

⁴ This is at the lower end of the range which Paper 2 identifies as being necessary to meet the Borough's housing requirements

⁵ This is based on the 'non-delivery' allowances shown in table 4.6 of the PSLP. Note that the PSLP reduces the supply by this level rather than increasing the requirement, though the result is the same.

	delivery		
c) (a+b)	Total need	10,362	13,680
SUPPLY			
d)	Yield from SHLAA sites (including provision from 2032 to 2035)	6,422	6,422 ⁶
e)	Yield from Green Belt releases	2,056	2,056
f)	Yield from delivery 2016 to 2017	489	489
g)	Small sites/windfall	1,395	1,395 ⁷
h) (d+e+f+g)	Total supply	10,362	10,362
SHORTFALL			
i)	Residential housing land requirement to be identified through further Green Belt releases (c-h)	0	3,318

Table 4.1: Adjusted residential housing land requirement 2016 - 2035

⁶ Peel considers this figure to be substantially lower but has proposed this be dealt with through inclusion of an appropriate flexibility allowance of 20% added to the requirement to mitigate the risk of under delivery. The characteristics of the supply and risks and uncertainties highlighted regarding the certainty of its delivery justify this approach.

⁷ This representation outlines that reliance on small/windfall and medium sites is too high against the Council's housing requirement. In the context of an uplift in requirement, as proposed by Peel, the proportion of small/windfall and medium sites as proposed by the Council would be at a more appropriate level. As such, no reduction to the supply is applied in Peel's adjusted calculation. A reduction in reliance on small/windfall and medium sites would be justified if the PSLP housing requirement were maintained however

Appendix 1: Review of PSLP Housing Trajectory

S/CAA 2017 Reference	Site Name	Post code	Gridref of / Brownfield g	Density (dph)	Altitude in Housing Zone	Site capacity	Units completed	Outstanding capacity	No. Affordable dwellings	Delivery Timescale	Emerging LP Allocation	UDP Allocation	UDP Policy	Browfield Land Register 2017	Constraints identified in the S/CAA	Green Belt Review Reference	Sustainability Appraisal	Turfey Comments	Turfey Overlay Delivery during the plan period	Outwelling in Years 1-5	Outwelling in Years 5-15
1	Land near of 127 Bason Road	WAT1 6DU	Haydock	Greenfield 0.4	30	2	12	0	12	0-8 yrs	Whitland within the Urban Intervention Zone (LPC12)	Open Space (B&AT)	Other Open Space	N/A	Description: Former industrial site. This site is not close to a train station or high frequency bus route but is otherwise accessible and located in a sustainable location. There are no policy constraints that would make the site unsuitable for housing but there are some constraints relating to flood risk and the need for flood risk assessment. The site has been previously developed and is currently used for industrial purposes. The site has been previously developed and is currently used for industrial purposes. The site has been previously developed and is currently used for industrial purposes.	N/A	N/A	Pre-application submission made before the start of the plan period. The site is not close to a train station or high frequency bus route but is otherwise accessible and located in a sustainable location. There are no policy constraints that would make the site unsuitable for housing but there are some constraints relating to flood risk and the need for flood risk assessment. The site has been previously developed and is currently used for industrial purposes. The site has been previously developed and is currently used for industrial purposes. The site has been previously developed and is currently used for industrial purposes.	12	12	
3	Land near of 14 to 25 Weymouth Avenue	WAB 3ZF	Par	Brownfield 0.38	39	1	14	0	14	8-10 yrs	Whitland within the Urban Intervention Zone (LPC12)	Whitland	N/A	BR001	Owned by a public authority	N/A	N/A	Description: Cleared former housing estate. This site is not close to a train station or high frequency bus route but is otherwise accessible and located in a sustainable location. A flood risk assessment would be required as part of this site is in flood zone 2. The site has been previously developed and is currently used for housing. The site has been previously developed and is currently used for housing. The site has been previously developed and is currently used for housing.	17	17	
4	Land between 9 & 14 Prospect Way and 167 & 123 Benny's Lane	WAB 3ZF	Par	Brownfield 0.28	38	1	11	0	11	8-10 yrs	Whitland within the Urban Intervention Zone (LPC12)	Whitland	N/A	BR002	Owned by a public authority	N/A	N/A	Description: Cleared former housing site. This site is not close to a train station or high frequency bus route but is otherwise accessible and located in a sustainable location. A flood risk assessment would be required as part of this site is in flood zone 2. The site has been previously developed and is currently used for housing. The site has been previously developed and is currently used for housing. The site has been previously developed and is currently used for housing.	14	14	
5	Land between Weymouth Avenue & Benny's Lane	WAB 3ZF	Par	Brownfield 0.52	35	1	18	0	18	8-10 yrs	Whitland within the Urban Intervention Zone (LPC12)	Whitland	N/A	BR003	Private ownership	N/A	N/A	Description: Cleared former housing site. This site is not close to a train station or high frequency bus route but is otherwise accessible and located in a sustainable location. A flood risk assessment would be required as part of this site is in flood zone 2. The site has been previously developed and is currently used for housing. The site has been previously developed and is currently used for housing. The site has been previously developed and is currently used for housing.	21	21	
7	Land at Park Road	WAB 1ER	Team Centre	Brownfield 0.78	36	1	28	0	28	8-10 yrs	Whitland within the Urban Intervention Zone (LPC12)	Whitland	N/A	BR004	Mixed ownership	N/A	N/A	Description: Cleared former housing site. This site is not close to a train station but is otherwise accessible and located in a sustainable location. There has previously been developed on the site and the site is currently used for housing. The site has been previously developed and is currently used for housing. The site has been previously developed and is currently used for housing.	20	20	
9	Land near of 14 to 25 Weymouth Avenue	WAB 3ZF	Par	Brownfield 0.38	39	1	14	0	14	8-10 yrs	Whitland within the Urban Intervention Zone (LPC12)	Whitland	N/A	BR005	Mixed ownership	N/A	N/A	Description: Cleared former housing site. This site is not close to a train station but is otherwise accessible and located in a sustainable location. There has previously been developed on the site and the site is currently used for housing. The site has been previously developed and is currently used for housing. The site has been previously developed and is currently used for housing.	20	20	

26	Marston Park - Former Palmington HQ	WMA10 JTP	West Park	Brownfield	10.8	15	2	162	0	162	0	64-12 yrs	POL section of the site only is within the Marston Park - Policy Urban Intervention Zone (LPC12)	White land	N/A	BB001 - covers 3.24ha of the site. The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12)	N/A	N/A	The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12) The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12)	0	0	0	0
27	Former Botolph Claydon Green, Marston Avenue	WMA10 LLL	West Park	Greenfield	0.27	37	2	15	0	15	0	64-12 yrs	Whitefield within the Urban Intervention Zone (LPC12)	Open space	N/A	EN1 - Private Facility	N/A	N/A	The site is not close to a train station or high speed rail line. The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12) The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12)	16	0	0	16
31	Former Sutton Arms PH, Elephant Lane	WMA10 SH4	Thames Heath	Brownfield	0.35	51	2	18	0	18	0	64-12 yrs	N/A	Whitefield	WMA10 SH4	Private Ownership	N/A	N/A	The site is not close to a train station or high speed rail line. The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12) The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12)	18	0	0	18
38	Land 8, Promenade at Larks Field	WMA10 SH4	Thames Heath	Brownfield	0.21	22	0	48	0	48	0	64-12 yrs	N/A	N/A	WMA10 SH4	Private Ownership	N/A	N/A	The site is not close to a train station or high speed rail line. The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12) The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12)	21	0	0	21
38	Land north of Elm Road Road	WMA10 SH4	Thames Heath	Brownfield	12.5	50	2	375	0	375	0	64-12 yrs	Whitefield within the Urban Intervention Zone (LPC12)	Landscaped Area	EN10	EN10	N/A	The site is not close to a train station or high speed rail line. The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12) The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12)	375	0	0	375	
38	Former Central Church Road	WMA10 SH4	Thames Heath	Brownfield	1.35	36	2	48	0	48	0	64-12 yrs	N/A	N/A	WMA10 SH4	Private Ownership	N/A	N/A	The site is not close to a train station or high speed rail line. The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12) The site is currently used for parking and storage. The site is being produced. LPC12 identifies the entire POL site as being produced. (LPC12)	48	0	0	48

Ref	Site ID	Site Name	Location	Area (ha)	Current Use	Proposed Use	Key Features	Notes	Other
80	W1001	W1001	W1001	0.33	0.33	0.33	0.33	0.33	0.33
81	W1002	W1002	W1002	0.33	0.33	0.33	0.33	0.33	0.33
82	W1003	W1003	W1003	0.33	0.33	0.33	0.33	0.33	0.33
83	W1004	W1004	W1004	0.33	0.33	0.33	0.33	0.33	0.33
84	W1005	W1005	W1005	0.33	0.33	0.33	0.33	0.33	0.33

65	Former Pumping Station, Station Road	NVA12 36W	Urban Centre	Browfield	0.27	37	1	10	0	0	0	6-10 yrs	Whitland	NVA	BRD18 Private ownership. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	BRD18 Private ownership. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	NVA	NVA	There is a large area of open land to the north of the site, which is currently used for agriculture. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	65
66	Land off Wargrave Road	NVA12 36W	Urban Centre	Browfield	0.3	23	2	7	0	0	0	6-10 yrs	Whitland	NVA	BRD18 Private ownership. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	BRD18 Private ownership. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	NVA	NVA	There is a large area of open land to the north of the site, which is currently used for agriculture. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	66
69	Site of former Part Primary School, West Lane	NVA12 13T	Urban Centre	Browfield	1.32	36	1	14	0	0	0	6-10 yrs	Whitland	ENVI	BRD18 Private ownership. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	BRD18 Private ownership. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	NVA	NVA	There is a large area of open land to the north of the site, which is currently used for agriculture. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	69
72	Site of former St Marks Primary School, Willow Tree Avenue	NVA12 42Z	Urban Centre	Browfield	0.31	35	2	18	0	0	0	6-10 yrs	Whitland	ENVI	BRD18 Private ownership. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	BRD18 Private ownership. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	NVA	NVA	There is a large area of open land to the north of the site, which is currently used for agriculture. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	72
74	Site of former 11th-13th Century Farm	NVA12 37N	Urban Centre	Browfield	0.3	30	2	9	0	0	0	11-15 yrs	Whitland	NVA	BRD18 Private ownership. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	BRD18 Private ownership. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	NVA	NVA	There is a large area of open land to the north of the site, which is currently used for agriculture. The site is not close to a train station or a bus stop, but it is otherwise accessible and located in a sustainable location. There are no known constraints to development (part of phase 2).	74

112	Land to the rear of 10A11 GAZ, Blackbrook (Greenfield) 1.14	10A11 GAZ	Blackbrook (Greenfield) 1.14	1.4	2	41	0	43	0	11:15 yrs	Immediately adjacent to River Zone/Urban Intervention Zone - Policy LPTC2	Whitland	N/A	BR028 Mixed Ownership	Description: Greenfield The site is not located close to a train station but is close to a bus stop and is accessible by public transport. The site is currently used for agricultural purposes and is thought to be in need of remediation prior to development. The closest EVA typology of modelled schemes is the 'Greenfield' typology. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	N/A	The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	0
113	Land at Willow Tree Avenue	10A13 GAZ	Greenfield 1.5	1.4	2	40	0	42	0	11:15 yrs	Whitland	Greenfield HGB 1	N/A	N/A	Description: Greenfield The site is not located close to a train station but is close to a bus stop and is accessible by public transport. The site is currently used for agricultural purposes and is thought to be in need of remediation prior to development. The closest EVA typology of modelled schemes is the 'Greenfield' typology. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	N/A	The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	0
114	Land at 19 and 25 Botton North Gate	10A13 GAZ	PD/GP 1.4	1.4	1	14	0	14	0	11:15 yrs	Whitland (Urban Intervention Zone (LPTC2))	Whitland (Urban Intervention Zone (LPTC2))	GB1 - 12	N/A	Description: Greenfield The site is not located close to a train station but is close to a bus stop and is accessible by public transport. The site is currently used for agricultural purposes and is thought to be in need of remediation prior to development. The closest EVA typology of modelled schemes is the 'Greenfield' typology. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	N/A	The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	0
115	Greenfield and 10A13 GAZ, Wyndle	10A13 GAZ	Greenfield 0.80	0.80	2	32	0	32	0	11:15 yrs	Whitland (Urban Intervention Zone (LPTC2))	Whitland (Urban Intervention Zone (LPTC2))	N/A	BR028 Private Ownership	Description: Greenfield The site is not located close to a train station but is close to a bus stop and is accessible by public transport. The site is currently used for agricultural purposes and is thought to be in need of remediation prior to development. The closest EVA typology of modelled schemes is the 'Greenfield' typology. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	N/A	The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	72
116	Greenfield and 10A13 GAZ, Wyndle	10A13 GAZ	PD/GP 0.32	0.32	1	12	0	12	0	11:15 yrs	Whitland (Urban Intervention Zone (LPTC2))	Whitland (Urban Intervention Zone (LPTC2))	N/A	BR028 Mixed Ownership	Description: Greenfield The site is not located close to a train station but is close to a bus stop and is accessible by public transport. The site is currently used for agricultural purposes and is thought to be in need of remediation prior to development. The closest EVA typology of modelled schemes is the 'Greenfield' typology. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	N/A	The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	0
117	Land near of 25-24 Mynydd Street	10A13 GAZ	PD/GP 0.35	0.35	1	14	0	14	0	11:15 yrs	Whitland	Whitland	N/A	N/A	Description: Greenfield The site is not located close to a train station but is close to a bus stop and is accessible by public transport. The site is currently used for agricultural purposes and is thought to be in need of remediation prior to development. The closest EVA typology of modelled schemes is the 'Greenfield' typology. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	N/A	The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development. The site is currently in use for agriculture and is thought to be in need of remediation prior to development.	0

150	Land south of Kew Road	WAS 20/1	Went Park	Brownfield	0.42	1	43	2	18	0	0	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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[illegible]

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The outstanding capacity figure includes the additional 273 dwellings expected to be delivered beyond the Plan period at SHLAA sites assumed by the Council within the Plan period is therefore, 6,422