
St Helens Borough Local Plan 2020-2035 Examination

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Programme Officer: Kerry Trueman

To: The Development Plans Manager

Sent via e-mail.

30 July 2021

Dear Ms O'Doherty

St Helens Local Plan Examination Housing Land Supply and revised National Planning Policy Framework

Further to the Matter 5 discussions (housing land supply), we set out below our preliminary findings on some of the issues raised in representations, statements and at the hearing.

Residual housing requirement

There has been an over-supply of housing against the requirement of 486 dwellings per annum (dpa) since the base date of the Local Plan. This leaves a minimum residual requirement for the remainder of the plan period (1 April 2021 to 31 March 2037) of 7132 dwellings (or around 446 dpa). Planning Practice Guidance is silent on whether or not over-delivery since the base date of the plan can be used to proportionately reduce the subsequent housing requirement over the rest of the plan period. That said, there is nothing in national policy or guidance which prevents an over-supply of housing in the early years of a Plan being taken into account. In the circumstances we consider that it would be reasonable to use a residual requirement of around 446 dpa for calculating both the 5-year requirement and the residual requirement for the rest of the Plan period. The 5-year requirement would also need to include a 5% buffer in accordance with paragraph 74 of the National Planning Policy Framework.

SHLAA Sites

Following the thorough discussion of disputed SHLAA sites we have considered the evidence and visited some of the sites. The following sites should be removed from the supply or their anticipated delivery amended in accordance with our recommendations:

Site 25 – Alexandra Park, Former Pilkington HQ

We note the contents of SHBC021 and related documents. The potential yield should reflect the listed building status of the complex and the extent of the registered park. In this respect it should anticipate a yield primarily from conversion of the buildings (taking into account

interior features of interest) with new build limited to the south-western portion of the site, beyond the registered park.

Site 63 – Land at Waterdale Crescent

On the basis that the site capacity is to be reduced from 10 units to 5 units, the site area would fall below the 0.25 ha threshold for SHLAA sites. Should the site come forward during the Plan period, it would contribute to housing supply as a small site windfall.

Site 84 – Land adjacent to Church of Christ

The site acts as informal open space and has visual and recreational value. As such the site would be protected by Policy LPC05 of the Local Plan even though it is not shown on the Policies Map. The site should be excluded from the supply.

Site 96 – Warrington Road

The site is landlocked and there is no evidence that it can be accessed. The site should be excluded from the supply. Should the site come forward during the Plan period, it would contribute to housing supply as a windfall site.

Site 102 – Vicarage Road

The site is in active employment use and a previous application was refused due to loss of employment land. There is no evidence that the site is suitable or available. The site should be excluded from the supply. Should the site come forward during the Plan period, it would contribute to housing supply as a windfall site.

Site 103 – Valentine Road

The north-east portion of the site forms part of the corridor of open space to the east of the housing estate and has visual and recreational value. This part of the site is shown on the Policies Map as part of the Greenway Network and has protection under Policy LPC07 of the Local Plan. The yield of the site should reflect that housing development should be limited to the roughly rectangular area behind the houses in Valentine Road, Sefton Street and Lloyd Crescent. Access could be achieved via the entrance off Lloyd Crescent.

Site 135 – Newby Place, Moss Bank

The site acts as informal open space and has visual and recreational value for the older persons bungalows that front onto it. As such the site would be protected by Policy LPC05 of the Local Plan even though it is not shown on the Policies Map. The site should be excluded from the supply.

Site HL525 – Fishwicks Industrial Estate, Baxters Lane

We note that during the Matter 5 hearing session it was accepted that the planning permission had expired and whether the site was deliverable or developable was to be reviewed, albeit this matter was not picked up on the action list. We would recommend that the trajectory is revised to reflect a developable site, not one that is deliverable.

Housing Allocations

SHBC023 sets out the Council's position on Housing Allocation 7HA. We concur with the note's conclusions that a revised site area of 5.33 ha should be able to deliver about 140 dwellings (based on a density of 35 dwellings per hectare and net developable area of 75%). Delivery from other allocations should be reviewed in accordance with Action No. 18 from the Matter 5 session.

Updated Trajectory and 5-year housing land supply position

As indicated at the review session, the Council should now proceed to update the housing trajectory¹, Table 4.6 of the Plan and the 5-year supply position taking into account the above comments and the other actions arising from the Matter 5 hearing and housing land supply actions from the other hearings (notably sessions dealing with Matter 4). These updates should be provided by 13 August.

Revised National Planning Policy Framework

On 20 July 2021, the Government published its revised National Planning Policy Framework, (the Framework). This replaces the previous version of the Framework published in February 2019. The revised Framework applies to all plans submitted for examination after 24 January 2019. This includes the St Helens Local Plan. One of the tests of soundness in paragraph 35 of the Framework is consistency with national policy. Accordingly, we would be grateful if the Council would consider the implications, if any, of the revised Framework for the Local Plan, including whether any Main Modifications will be required.

If you require any clarification on the above please let us know via the Programme Officer.

Yours sincerely

Mark Dakeyne and Victoria Lucas

PLANNING INSPECTORS

¹ Comprising Table 4.7 and Figure 4.3 of the Plan and the detailed site-by-site trajectory