



# St Helens Local Plan 2020-2035 Examination in Public

## Hearing Statement on behalf of Story Homes

### Matter 3 – Spatial Strategy and Strategic Policies

May 2021

Relevant Site:

Land south of A580 between Houghtons Lane and Crantock Grove, Windle (Site 8HS)

Representor ID: RO1954

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## 1 Introduction

- 1.1 This statement has been prepared by Hive Land & Planning on behalf of Story Homes and responds to the Matters, Issues and Questions released by the Inspectors on 30<sup>th</sup> March 2021. In this submission Story Homes are responding to **Matter 3, Issues 1, 2, 3, 5, 6 and 7.**
- 1.2 The involvement of Story Homes in the St Helens Local Plan Examination relates to the continued promotion of the Land south of A580 between Houghtons Lane and Crantock Grove, Windle, Ref 8HS (hereafter referred to as Site 8HS). Story Homes has promoted Site 8HS for the residential development of around 1,100 dwellings throughout the Local Plan preparation process. This promotion has been undertaken following an agreement with the landowners.
- 1.3 Site 8HS is currently located within the Green Belt and has been identified as a Safeguarded Site within the Submission Draft St Helens Local Plan 2020 -2035, to be reserved for future residential development until after the plan period, unless a subsequent Local Plan Review proposes to allocate the land for development. In safeguarding Site 8HS, the Council has recognised that Site 8HS represents a suitable and sustainable location for housing and Story Homes welcome and support this recognition.
- 1.4 In the 2016 Preferred Options Draft of the Local Plan however, Site 8HS was identified as a Housing Allocation to come forward within the current Plan Period. This further confirms the Council's acceptance that Site 8HS, as a matter of principle, is a suitable location in which to locate this scale of new housing.
- 1.5 The Council has therefore acknowledged the acceptability of Site 8HS for residential development at every stage of the plan-making process.
- 1.6 This Hearing Statement should be read in conjunction with all the statements being submitted by Story Homes in response to **Matters 1, 2,, 4, 7, 10 and 11.**
- 1.7 We trust that this Statement assists the Inspectors in respect of the Examination.

## 2 Matter 3 – Spatial Strategy and Strategic Policies

### Issue 1: Previously developed land and housing densities

*Question 1. Is there any inconsistency between LPA02 and the Framework in relation to its approach to brownfield land?*

- 2.1 Story Homes are supportive of Policy LPA02 taking a brownfield land first approach to allocating land for development, which is in line with the requirements of Section 11 of the NPPF. However, there is not enough available brownfield land in the Borough to meet housing needs during the plan period and quite correctly the Council has undertaken a Green Belt Boundary review to identify the additional land required through the Local Plan review process, as is also required by the NPPF.
- 2.2 Story Homes are of the view that the quantum of land (and associated housing yield) that the LP has identified within the existing urban area as being available for development is unrealistic and this has resulted in insufficient land being released from the Green Belt and allocated for residential development during this plan period. This is not in accordance with the NPPF and this issue is returned to in our response to questions later on in this representation and within the Story Homes Matter 2 and Matter 5 Hearing Statements.

*Question 2. Would Section 3 of Policy LPA05 ensure that optimal use is made of sites as set out in paragraph 123 of the Framework?*

- 2.3 Story Homes are of the view that establishing minimum densities should not be at the expense of the wider placemaking agenda. MHCLG recently demonstrated again their commitment to, and the importance of, placemaking and good design in the built environment; with the publication of a new *National Design Guide; Planning practice guidance for beautiful, enduring and successful places* (October 2019). The Design Guide adds to and strengthens existing national design policy, which is set out in the NPPF and supplementary planning guidance documents. The LP should therefore be strongly advocating the importance of the design and placemaking agenda.
- 2.4 In addition, applying minimum densities suggests that the housing mix should always be dominated by smaller units, which does not align with the evidence provided in the St Helens Strategic Housing Market

Assessment Update January 2019 (Doc: SHOU001)(SHMA). The SHMA confirms at Table 30 that 4+bedroom properties are currently under-represented in St Helen's, with 15% of the housing stock being 4 bedrooms or more, compared to the North West average of 22% and England average of 25%. The recommended housing mix for market housing provided at paragraph 7.35 then suggests that 20% of properties should be 4+bedrooms on average across the borough as a whole. This would also include inner urban areas that are likely to drive higher densities through the incorporation of apartment schemes and so in locations where family housing predominates, the housing mix will be skewed more heavily towards 4+ bedroom schemes, which drives densities down given the need to accommodate adequate outdoor amenity space and make provision for open space and other related green infrastructure.

- 2.5 Story Homes have also found that buying habits have changed given the situation that has occurred over the past 12-18 months, with buyers valuing private open space and the ability to work flexibly from home.
- 2.6 Given the above, it is the view of Story Homes that successful plan making and place making is much more nuanced than simply setting a minimum density policy to try and get more houses delivered on the minimum amount of land possible. There are many factors to be considered such as market demand, physical constraints (including mitigation measures), design quality, local area characteristics and sustainability.
- 2.7 Flexibility should be built into the LP to recognise that sites have different challenges and opportunities, which will influence what the optimum numbers of dwellings that can be delivered on a scheme. A pragmatic approach is more likely to ensure that a sufficient level of housing comes forward that achieves the balance between optimising the use of land and maintaining a focus on place-making principles.

## Issue 2: Green Belt and Exceptional Circumstances

*Question 3. Does the presence of Green Belt provide a reason for restricting the overall scale of development proposed by the Plan (paragraph 11. b) i of the Framework)?*

- 2.8 The presence of Green Belt does not provide a reason for restricting the overall scale of development proposed by the LP and this approach is in line with the advice set out in the NPPF.

2.9 The preparation of the LP has presented a vital opportunity to review the Green Belt boundaries within St. Helens. Story Homes welcome and strongly support the Council's acknowledgement that not all of the Borough's future housing needs can be met within the existing urban areas and that exceptional circumstances exist, in line with paragraph 136 of the NPPF, to justify the release of Green Belt land within the plan period. Paragraph 136 is clear that Green Belt boundaries should only be altered through the preparation or updating of Local Plans.

*Question 4. Have, in principle, exceptional circumstances been demonstrated for the alteration of Green Belt boundaries?*

2.10 Story Homes agree that in principle, exceptional circumstances have been demonstrated for the alteration of Green Belt boundaries. However, the extent of land that has then been identified for release is insufficient to meet St Helens' housing needs in full during the plan period and as expressed in our Matter 1 Hearing Statement, we also have concerns about the site identification process as it relates to the land being promoted by Story Homes (Site 8HS).

2.11 A greater quantum of land therefore needs to be released from the Green Belt to meet housing needs in full. This position is expanded on further in Story Homes Matter 2 and Matter 5 Hearing Statements.

*Question 5. On the assumption that the housing and employment requirements are justified, has the quantum of Green Belt release been supported by proportionate evidence? For example, has effective use of sites in the built-up areas and brownfield land been fully explored, including optimising the use of such land?*

2.12 The Consortium Matter 2 Hearing Statement provides the evidence that the LP has not successfully aligned the housing and employment land requirements for St Helens over the plan period. The Council have been rightly ambitious in respect of future employment growth aspirations and have allocated the land accordingly, so the same ambition needs to be applied when considering the quantum of housing growth needed to complement the employment allocations that have been identified. These are not mutually exclusive considerations. Alignment of these two critical requirements is necessary if a balanced approach is to be taken in respect of meeting St Helens future development needs and economic growth aspirations.

2.13 Story Homes also contend that the LP is over optimistic about the yield of housing that can be delivered from sites within the existing urban area and further commentary to justify this stance is provided in Story

Homes Matter 5 Hearing Statement. For example, historic residential allocations and extant (or lapsed) planning permissions that have not delivered over a period of many years are included within the claimed supply and it is reasonable at this stage to assume that they have no realistic prospect of coming forward for development and so should not be considered deliverable or developable.

- 2.14 Paragraph 018 Reference ID: 3-018-20190722 of the PPG on Housing and Economic Land Availability Assessments is clear that where there are historic allocations or permissions on brownfield sites that have yet to deliver any housing and seem to have no immediate prospect of doing so, LPAs should exercise caution in simply rolling forward the allocation or permission as a definitive yield into the next LP:

*'Sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability. This can be informed by a range of factors including the suitability of the land for different uses and by market signals, which will be useful in identifying the most appropriate use.'*

- 2.15 In order to ensure that the evidence base (SD025: Housing Need and Supply Background Paper) used to inform decisions on the yield of housing anticipated in the existing urban areas results in a robust and sound outcome, the Council should fully explain what steps have been taken to reassess the deliverability and developability of historic sites. For example, if sites have clearly stalled or have been the subject of multiple lapsed planning permissions but they are included within the housing trajectory for the plan period, the Council should clearly set out what steps have been taken to understand why a site has not yet come forward and whether/how barriers can be overcome. This could be in the form of conversations with landowners or those who control sites, assessing what the previous barriers have been to delivery and identify the proactive steps the Council could take to help unlock sites and facilitate development.
- 2.16 The PPG also advises that the LPA should have confidence there are no legal or ownership impediments to delivery and that consideration should be given to the delivery track record of developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions. It is not clear when reviewing Document SD025 that these matters have been fully explored and this shortcoming is dealt with in more detail within the Matter 5 Hearing Statement.

*Question 6. On a Boroughwide level is the methodology for Green Belt assessment robust and reasonably consistent with that used by adjoining authorities?*

- 2.17 Story Homes consider the methodology that has been employed in respect of the Green Belt Review (GBR) (2018) is robust and is consistent with that used by adjoining authorities.

**Issue 3: The principle of safeguarded land being identified to meet longer term development needs**

*Question 7. Are the proposals to identify safeguarded land between the urban area and the Green Belt justified to meet longer-term development needs?*

- 2.18 Story Homes support the identification of safeguarded land as advocated in Paragraph 139 of the NPPF, which states that local plans should:

*“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.”*

- 2.19 Story Homes are however of the view that there is an overwhelming case to allocate Site 8HS for development in this Plan Period (see Question 8). Should the Inspectors however be minded not to identify the Site for allocation, Story Homes submit that the identification of the Site as safeguarded land would be wholly appropriate and indeed essential to ensure the soundness of the LP.

*Question 8. Has enough or too much land been proposed for safeguarding to meet longer-term development needs?*

- 2.20 Story Homes consider that the LP has not identified sufficient land for release from the Green Belt to meet housing needs. There is uncertainty that sites within the existing urban area will deliver as anticipated and as such the Council will need to identify additional sources of land through a Local Plan Review if the current status is maintained.

- 2.21 Story Homes Matter 5 Hearing Statement concludes that additional Green Belt land (including Site 8HS) should be identified as Housing Allocations to ensure a sound strategy is adopted, alongside additional land that should be safeguarded to meet needs well beyond the plan period.

*Question 9. In general terms is the safeguarded land in the right place to meet longer-term development needs?*

- 2.22 Story Homes agree that the safeguarded sites that have been identified are in the right place. Site 8HS (which is currently identified as Safeguarded Land) is confirmed as an appropriate location for residential development but is better placed to meet shorter term development needs during the plan period. The Council has consistently identified Site 8HS as being a suitable housing site throughout the LP preparation process since the Regulation 18 stage (when it was identified as a Housing Allocation) and the evidence base, in particular SD005 Sustainability Appraisal, SD020 Green Belt Review and SD021 Green Belt Review Stage 2B Assessments underpin this position.
- 2.23 Site 8HS is solely under the control of Story Homes and as a housebuilder with an excellent track record of delivery, the site is capable of delivering housing in the early stages of the plan period and will help to balance the overall spatial distribution of sites, which is currently heavily skewed towards town centre and inner urban sites (this represents 60% of all allocations). This skewed distribution of allocated sites will not result in a sustainable pattern of development that meets all identified housing needs across the Borough, such as affordable and family housing, and questions still remain over the realistic prospects of delivery of a number of the sites included within the plan period trajectory (as addressed in our response to Question 5).

*Question 10. Are the terms of Policy LPA06, particularly in relation to the release of safeguarded land consistent with national policy?*

- 2.24 It is recommended that given the wider concerns over the deliverability and viability of sites identified by the Council in the urban area, that Policy LPA06 includes a policy containing a formal 'trigger' mechanism for considering the release of Safeguarded Sites in the event the allocated sites and SHLAA sites do not come forward as anticipated.
- 2.25 Point 2 of Policy of LPA06 should therefore be amended to include a time limit for the review of Local Plan performance against housing targets, which should be no later than five years after adoption and sooner if it becomes evident that strategic sites are going to be stalled, or other circumstances come in to play that result in a lower anticipated yield of housing during the plan period. The policy 'trigger' should refer to the findings of the Annual Monitoring Report and if it becomes apparent that annual completions

are not meeting short to medium term housing needs, a review of suitable Safeguarded Sites should be instigated. The timing of review should also take into account the 5 year housing land supply calculation for the Borough.

- 2.26 Story Homes' view is that this should also be taken a step further and suitable sites identified now as suitable 'Plan B' sites should these circumstances arise. This approach was endorsed by the Inspector conducting the Examination into the West Lancashire Local Plan and Policy RS6 sets out the triggers that apply for 'Plan B' sites to be considered, which are related to housing delivery performance considered against the housing target.
- 2.27 The formal 'trigger' mechanism for a review of Safeguarded Sites and the identification of 'Plan B' sites should therefore be included within the wording of Policy LPA06 as this would improve the flexibility of the Plan to adapt to rapid changes in circumstance, as set out in the NPPF (Paragraph 11) and will allow sites to come forward in a more structured and well-planned manner rather than through speculative planning applications and/or Section 78 appeals.

#### **Issue 4: Compensatory improvements to Green Belt land**

- 2.28 Story Homes have no specific points to raise in response to Issue 4, Questions 11 and 12.

## Issue 5: The spatial distribution

### *Question 13. Is the spatial distribution of development within the Plan justified?*

- 2.29 The over-reliance on SHLAA sites within inner St Helens will result in a LP Strategy which is not effective and will not achieve sustainable development across the Borough. It will result in a skewed distribution of housing sites, with over 60% of the overall supply focussed on the town centre and inner urban areas. This will fail to deliver the required balance of affordable and family dwellings that are also required across the Borough, as confirmed within HOU001: St Helens Strategic Housing Market Assessment Update, which concludes there is a need to deliver 117 affordable homes per annum (net) and a continued demand for family housing, particularly from newly forming households.
- 2.30 In addition, there are known viability challenges associated with brownfield sites in inner St Helens, meaning that contributions towards the provision of open space, affordable housing and other infrastructure needs will not be forthcoming, leading to negative social and environmental impacts. The high density nature of such sites will also mean that key infrastructure such as open space is not likely to be delivered on site and the aspiration to achieve accessible and adaptable standards for homes (Parts M(2) and M4(3)) will also be compromised. Longer lead-in times will also be needed for many of these sites given that major up-front infrastructure may be needed to unlock their development potential.
- 2.31 The majority of the SHLAA sites (please refer to our Matter 5 Hearing Statement) are highly unlikely to deliver the requisite level of affordable, family or elderly housing provision identified under Policy LPC02 as a result of the viability concerns expressed above (in respect of the affordable) and the high quantum of apartments that will be proposed in the inner areas (in respect of the family and elderly housing).
- 2.32 A more even distribution of housing is therefore needed across the Borough, to account for a variety of house sizes and tenures and make sure that all market and affordable housing needs are met in full.

### *Question 14. Has the spatial distribution had regard to the impacts on climate change, including CO2 emissions?*

- 2.33 Story Homes have no specific points to raise in response to Question 14.

## Issue 6: Site selection

*Questions 15. Taking into account the range of factors considered in site selection, has the Council's approach been robust, positive and justified?*

2.34 The site selection process for housing land supply is set out in Document SD026 Developing the Strategy Background Paper, paragraphs 6.25 – 6.28. Our answer to Question 15 therefore responds to each of the factors that have been considered.

### Sources of Land Supply (para 6.24 – SD026)

2.35 Story Homes agree with the LPA's high level approach to allocate housing sites comprising of a mix of brownfield sites within existing urban areas and sites to be taken out of the Green Belt.

### Urban Land Supply (para 6.25 SD026)

2.36 Story Homes do not consider that a robust approach has been taken by the Council when calculating the quantum of housing land supply from the existing urban area, with reference to the SHLAA and Brownfield Land Register. The Council confirm at Para 6.25 of Document SD026 that the Urban Land Supply sites identified as allocations are only suitable 'in principle'. It is the view of Story Homes that an 'in principle' suitability for development, does not provide enough certainty that a site will come forward for delivery during the plan period, especially in the absence of any (even high level) analysis of site constraints contained within the SHLAA Pro Forma's.

2.37 The LPA should have done more, in line with the advice set out at paragraph 18 of PPG Housing and Economic Land Availability Assessments, to assess the up-to-date circumstances of the 'in principle' supply to identify the quantum of viable, deliverable and available urban land. The process is therefore not considered to have been thorough, resulting in an unjustified over-reliance on the claimed Urban Land Supply.

### Green Belt Review (Para 6.26 – SD026)

2.38 Overall, Story Homes consider the Green Belt Review (GBR) (2018) undertaken to inform the LP takes a robust approach in line with methodologies used elsewhere. We would note that the GBR is linked to

the Sustainability Appraisal (SA), which Story Homes have raised concerns about in the Matter 1 Hearing Statement.

2.39 The main concern with the SA is the decision to not consider site based technical evidence, which demonstrates how the impact of development can be mitigated against. Figure 1 below shows the amended SA score for Site 8HS (which takes into account the sustainability mitigation that can be achieved on Site 8HS) as submitted by Story Homes in response to the Submission Draft consultation. The higher the score the better performing each site is against the SA objectives and it has clearly been demonstrate that Site 8HS is one of the most suitable locations for new housing in the Borough when considered against proposed Housing Allocations and other Safeguarded Sites.

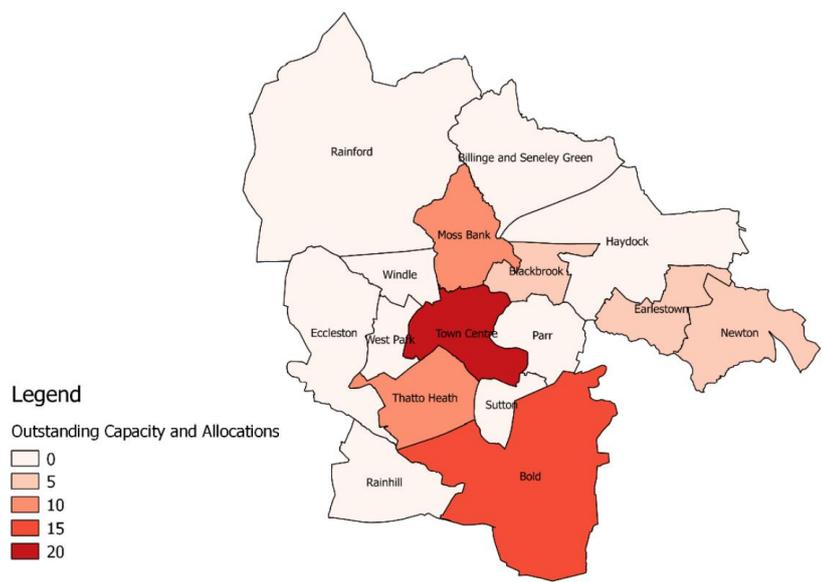
Figure 1: Copy of Adjusted SA Assessment submitted by Story Homes to the Submission Draft Local Plan consultation

Table 4: Amended Assessment of Allocated and Safeguarded Sites			
Ref	Site Name	SA Score <sup>1</sup>	Overall Contribution to Green Belt <sup>4</sup>
5HA	Land South of Gartons Lane and Former St Theresa's Social Club, Gartons Lane, Bold	66	Low
2HA	Land at Florida Farm (South of A580) Slag Lane, Blackbrook	63	Low
2HS	Land between Vista Road and Belvedere Road	62	Medium
8HS	Land south of A580 between Houghtons Lane and Crantock Grove, Windle	61	Low
7HS	Land South of Elton Head Road (adjacent to St John Vianney Primary School) Thatto Heath	60	Low
3HS	Former Eccleston Park Golf Club, Rainhill Road, Eccleston	58	Low
4HS	Land East of Newlands Grange (former Vulcan works) and West of West Coast Mainline, Newton-le-Willows	57	Low
1HA	Land South of Billinge Road, East of Garswood Road and West of Smock Lane	57	Low
7HA	Land West of the A49 Mill Lane and to the East of the West Coast	57	Low
	Mainline railway line, Newton-le-Willows		
5HS	Land West of Winwick Road and South of Wayfarers Drive, Newton-le-Willows	57	Low
6HS	Land East of Chapel Lane and South of Walkers Lane, Sutton Manor	56	Low
8HA	Land South of Higher Lane and East of Rookery Lane, Rainford	55	Low
1HS	Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood	54	Medium
4HA	Land bounded by Reginald Road/Bold Road/Travers Entry/Gorse Lane/Crawford Street, Bold	54	Medium

Site allocations across the settlements para 6.26 SD026 / Land at Bold (para 6.26 SD026)

2.40 Story Homes does not agree that the process for allocating sites across the settlements is robust. There is a clear imbalance of housing distribution across the Borough, which is still not rectified through the proposed Green Belt allocations, please see Figure 2 below. This approach is not justified or appropriate. The proposed distribution of housing will not effectively meet the range of housing needs required in the Borough, explicitly for both market (particularly family housing) and affordable housing in different parts of the Borough.

Figure 2: Ward Map showing percentage of total supply in each ward (including Green Belt Allocations)



2.41 It is clear that a more even distribution needs to be achieved across the settlement of St Helens and that the Windle ward is extremely well positioned to accommodate additional growth, with Site 8HS already confirmed as being an appropriate location for new housing. It is clear that the Town Centre and Bold (which is considered to be a less sustainable location than Windle), are over-provided for. The heavy reliance upon these areas to deliver future housing needs is flawed as the localised housing market is only able to maintain sales rates at a certain pace. A wider distribution, but still targeted towards sustainable locations, will ensure that the market is capable of maintaining a healthy pace of delivery throughout the plan period across the borough as a whole.

## Issue 7: Policies LPA03 and LPA01

### *Question 16. Is Policy LPA03 consistent with national policy and effective?*

- 2.42 Story Homes agree that Policy LPA03 accords with and is consistent with national policy. However, the inclusion of this policy does not necessarily mean that the Local Plan Strategy is going to be effective.
- 2.43 The Council have pursued a spatial strategy which is heavily skewed towards urban centres, particularly St Helens Town Centre, and sites which have previously failed to come forward for development, despite in some instances being allocated for residential development. This strategy will therefore fail to meet all the needs of the community as required by Point 4 of the Policy LPA03 and the weighting of the site identification process towards sites with viability challenges will fail to deliver the affordable housing the Borough requires, failing to achieve the objective set out under Point 2 of Policy LPA03.

### *Questions 17. Is Policy LPA01 necessary for the soundness of the Plan?*

- 2.44 Story Homes view is that Policy LPA01 is a necessary inclusion for the soundness of the Plan. The presumption in favour of sustainable development is a fundamental planning policy objective that should carry full weight within the development plan.

Hearing Statement on behalf of Story Homes  
Matter 3 – Spatial Strategy and Strategic Policies