



Barratt Homes (RO1944)

ST HELENS LOCAL PLAN EXAMINATION

Matter 3 – Spatial Strategy and Strategic Policies





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TYPE OF DOCUMENT (VERSION) PUBLIC

PROJECT NO. 62260761

DATE: MAY 2021

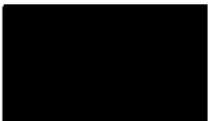
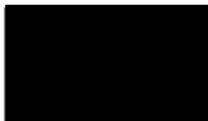
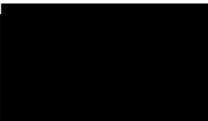
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QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	First draft	Final		
Date	06/05/2021	07/05/2021		
Prepared by	Victoria Coleman	Victoria Coleman		
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Signature				
Project number	62260761	62260761		
Report number	Matter 3	Matter 3		
File reference	21450001	21450001		

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INTRODUCTION



1 INTRODUCTION

- 1.1.1. This Hearing Statement is submitted on behalf of Barratt Homes (“Barratt”) (Respondent ID: RO1944) in respect of the St.Helens Borough Local Plan 2020-2035 (“the Plan”) Examination.
- 1.1.2. It has been prepared by WSP in relation to Matter 3 (Spatial Strategy and Strategic Policies), specifically in relation to:
- Issue 1 (Previously Developed Land and Housing Densities) – Question 2;
 - Issue 2 (Green Belt and Exceptional Circumstances) – Questions 3, 4, 5 and 6;
 - Issue 5 (The Spatial Distribution) – Question 13;
 - Issue 6 (Site Selection) – Question 15; and
 - Issue 7 (Policies LPA03 and LPA01) – Question 16.
- 1.1.3. As you will be aware, Barratt controls the site at Florida Farm South in Haydock, which is proposed to be allocated for residential development by Policy LPA05 (ref: 2HA)

SUMMARY

- 1.1.4. In summary, our answers to the Inspectors’ Matters, Issues and Questions (“MIQs”) conclude that:
- Question 2 – Policy LPA05 is overly prescriptive, confusing and unwieldy while paragraph 4.18.14 is contradictory. Further amendments are required to make the Policy effective;
 - Question 3 – the presence of Green Belt does not provide a reason for restricting the overall scale of development proposed;
 - Question 4 – exceptional circumstances have been demonstrated for the alteration of Green Belt boundaries;
 - Question 5 – the quantum of Green Belt release is supported by proportionate evidence;
 - Question 6 – the Green Belt assessment methodology is robust and reasonably consistent with adjoining authorities;
 - Question 13 – whilst the overall spatial distribution of development is supported, the emphasis placed on brownfield sites is not justified;
 - Question 15 – the approach to site selection is robust, positive and justified; and
 - Question 16 – Policy LPA03 is consistent with national policy and is effective.
- 1.1.5. To aid the Inspectors, we have cross-referenced our answers to the ‘tests of soundness’ and have suggested modifications (where necessary) to make the Plan ‘sound’.
- 1.1.6. We look forward to elaborating further on our Statement and representations with the Inspectors at the hearing session on Thursday 27 May 2021.

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QUESTIONS



2 QUESTIONS

2.1 ISSUE 1: PREVIOUSLY DEVELOPED LAND AND HOUSING DENSITIES

QUESTION 2

Q2. Would Section 3 of Policy LPA05 ensure that optimal use is made of sites as set out in paragraph 123 of the Framework?

- 2.1.1. Whilst the setting of minimum densities is broadly supported, in our view, Section 3 of Policy LPA05 requires further amendment to be **effective**.
- 2.1.2. Paragraphs 122 and 123 of the National Planning Policy Framework (“NPPF”) require planning policies to support development that makes efficient use of land. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that policies avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
- 2.1.3. The Policy as drafted, together with the suggested Main Modification (“MM”) in the Council’s Response to the Inspectors’ Preliminary Matters, Issues and Initial Questions (“PQs”) (January) [SHBC001] at PQ23, does not address our concerns.
- 2.1.4. For sites like Florida Farm South (ref: 2HA) that are proposed to be allocated but are currently designated as Green Belt, it is unclear which part of the Policy is applicable. Such sites are clearly not located in or adjacent to town, district or local centres and are technically not within an existing urban area (albeit they will form part of the urban area once developed). Whilst Barratt have demonstrated in its representations that the site is sustainably located and well served by public transport, it would be helpful for clarity if the Policy were amended to confirm which density would be applicable to allocated sites adjacent to the existing urban area.
- 2.1.5. The elaboration at paragraph 4.18.14 of the reasoned justification is contradictory. It states that the densities relevant to site allocations in Table 4.5 of the Plan are minimums. However, it also states that the site capacities are indicative and do not represent maximums or minimums. Clearly, the capacity of a site is dependent on its density and vice versa.
- 2.1.6. In our view, imposing set densities can negatively impact site delivery. Therefore, the Policy should be amended to enable site density to be assessed on a case-by-case basis to ensure effective use of land while allowing flexibility for local and site characteristics, market aspirations and site viability. It should also be clarified both within the Policy itself and the reasoned justification that the densities (and not just the capacities) provided in Table 4.5 are only indicative. A corresponding amendment to Table 4.5 would be required for completeness.
- 2.1.7. Notwithstanding this, we would urge the Inspectors to reflect on whether the approach of listing various classifications of sites within the Policy is overly prescriptive, confusing and unwieldy, and therefore whether more significant amendment is required to facilitate flexibility, in the spirit of our requested changes.
- 2.1.8. Barratt recommends that this amendment should be dealt with through a MM.

2.2 ISSUE 2: GREEN BELT AND EXCEPTIONAL CIRCUMSTANCES

QUESTION 3

Q3. 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)?

- 2.2.1. In our view, the presence of Green Belt does not provide a reason for restricting the overall scale of development proposed, and to do so, the Plan would not be **positively prepared**.
- 2.2.2. Paragraph 11bi of the NPPF requires strategic policies to, as a minimum, provide for objectively assessed needs for housing and other uses, unless factors such as the Green Belt provide reason enough to restrict development.
- 2.2.3. The presence of Green Belt is a significant factor, but one which should be considered in the context of meeting needs. It should be remembered that Green Belt is only a planning policy constraint, as opposed to the other, arguably more significant and statutory designations contained within footnote 6 of the NPPF. The proportionate release of Green Belt would better align with the Spatial Vision, Strategic Aims and Objectives within Chapter 3 of the Plan, in a way that is aspirational and contributing to sustainable development.

QUESTION 4

Q4. Have, in principle, exceptional circumstances been demonstrated for the alteration of Green Belt boundaries?

- 2.2.4. Yes, in our view, exceptional circumstances have been demonstrated for the alteration of Green Belt boundaries, and therefore the Plan is **positively prepared, justified and consistent with national policy** in this regard.
- 2.2.5. Paragraph 137 of the NPPF states that before concluding that exceptional circumstances exist, authorities should have fully examined all other reasonable options for meeting its identified need for development.
- 2.2.6. As evidenced at paragraph 1.8 of the Green Belt Review (December 2018) [SD020], Green Belt boundaries in St.Helens have remained substantially unchanged since being originally designated in 1983 – a period of nearly 40 years. In this timeframe, population has grown, overcrowding has increased, and affordability has worsened.
- 2.2.7. Whilst urban regeneration and increasing densification has proven successful in previous decades, urban land is now insufficient to meet needs fully, as evidenced by historic shortfalls in housing delivery (as highlighted in our Matter 2 statement) and an exhausting future trajectory of urban housing sites. Neighbouring authorities have already adjusted their Green Belt boundaries to meet their own needs, but cannot accommodate any of St.Helens' needs. The only option remaining for St.Helens therefore is to release land from the Green Belt to meet needs. In these terms, the provision of new housing and employment constitutes exceptional circumstances.

QUESTION 5

Q5. 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?

- 2.2.8. In our view, the quantum of Green Belt release is supported by proportionate evidence, and therefore the Plan in this regard is **justified**.
- 2.2.9. The exhausting supply of deliverable and developable land within the urban area is not a new phenomenon in St.Helens. Each update of Strategic Housing Land Availability Assessment (“SHLAA”) since 2010 has found that there is inadequate land in the urban area to meet housing needs in the longer term. Indeed, the Core Strategy (October 2012) [LOC001] forecast a shortfall in the latter part of its plan period (in years 2022/23-2026/27).
- 2.2.10. At paragraph 14.14 of LOC001, it was identified that the Council would consider meeting a shortfall in identified needs in four ways:
- Windfall allowance – releasing sites from other existing uses (e.g. employment land);
 - Increased densities – seeking to increase densities through the delivery of apartment schemes;
 - Potentially suitable sites – reconsidering the suitability of sites currently used as open space and those with access sites; and
 - Green Belt release – releasing Green Belt land as a last resort and only following work in collaboration with neighbouring authorities.
- 2.2.11. In our view, in preparing the Plan, the Council has thoroughly investigated each of these options in the supporting evidence base and has correctly concluded that Green Belt release is the only option remaining to fully meet needs.

QUESTION 6

Q6. On a Boroughwide level is the methodology for Green Belt assessment robust and reasonably consistent with that used by adjoining authorities?

- 2.2.12. Yes, in our view, the St.Helens methodology in the Green Belt Review (December 2018) [SD020] and Green Belt Review Stage 2B Assessments (October 2020) [SD021] is robust and appears to be reasonably consistent with that used by adjoining authorities, and therefore the Plan in this regard is **justified**.

2.3 ISSUE 5: THE SPATIAL DISTRIBUTION

QUESTION 13

Q13. Is the spatial distribution of development within the Plan justified?

- 2.3.1. Overall, we are supportive of the proposed distribution of development within the Plan. In our view, the identification of ‘Key Settlements’ (particularly Haydock), will lead to sustainable development being delivered across the Borough. As evidenced by the Plan and the supporting evidence base, the largest settlements provide, or are large enough to provide, a range of facilities and services to meet many day to day household needs and as such support the level of development proposed. Sites such as Florida Farm South (ref: 2HA) can make a valuable and meaningful contribution to meeting identified needs while aligning with the spatial distribution.
- 2.3.2. However, we have concerns over the emphasis placed on the delivery of previously developed sites, which is **not justified**. As set out above, brownfield sites alone are not sufficient to meet objectively assessed needs. In response to Section 3 of Policy LPA02, a significant proportion of new housing throughout the Plan period will equally be on greenfield sites (e.g. Florida Farm South (ref: 2HA)).

- 2.3.3. We also question the rationale for lowering the threshold for developer contributions for developers of brownfield sites, given that it is too simplistic to assume that developers of greenfield sites will encounter less constraints and therefore costs than their brownfield counterparts.
- 2.3.4. In our view, for the Plan to be **justified**, an amendment to the spatial strategy is required to better reflect the balance between delivery of housing on greenfield and brownfield land.
- 2.3.5. Barratt recommends that this amendment should be dealt with through a MM.

2.4 ISSUE 6: SITE SELECTION

QUESTION 15

Q15. Taking into account the range of factors considered in site selection, has the Council's approach been robust, positive and justified?

- 2.4.1. In our view, we are supportive of the Council's approach to site selection and believe the Plan has been **positively prepared** and is **justified** in this regard.
- 2.4.2. The site selection process has been founded on solid planning principles having regard to the achievement of sustainable development. As helpfully summarised at paragraph 4.6.10 of the Plan and acknowledged by the Inspectors, this has included a detailed assessment of Green Belt, alongside assessments of technical constraints, accessibility, infrastructure delivery and viability. The Council's approach has resulted in a positive suite of deliverable and developable allocations in sustainable locations (such as Florida Farm South, ref: 2HA) which will enable good accessibility between homes, jobs and key services, in accordance with the spatial distribution in Policy LPA02. We are supportive of the site selection process and assert that it is robust, positive and justified.

2.5 ISSUE 7: POLICIES LPA03 AND LPA01

QUESTION 16

Q16. Is Policy LPA03 consistent with national policy and effective?

- 2.5.1. Yes, in our view, we believe that LPA03 is consistent with **national policy** and is **effective**.
- 2.5.2. On the whole, we support the development principles outlined within the Policy as they relate to the Key Issues identified at paragraph 2.10.1 of the Plan and the Spatial Vision and Strategic Aims and Objectives contained within Chapter 3. We believe that they are sufficient to guide development without being overly onerous or prescriptive. However, it should be recognised that not all development will be able to respond in a positive way to each of the principles outlined and that mitigation measures may need to be outlined. In some cases, a judgement will need to be applied in the planning balance, with regard to 'the presumption' in paragraph 11 of the NPPF.
- 2.5.3. Notwithstanding this, Barratt's allocated site at Florida Farm South (ref: 2HA) supports the development principles identified within the Policy. In summary, it will provide a significant number of homes and will create sustainable communities with a strong sense of place; meet the challenges of population retention and growth; improve economic well-being; contribute to inclusive communities; contribute to a high quality built and natural environment; minimise the need to travel and maximise the use of sustainable transport; promote healthy communities; and lower the Borough's carbon footprint.



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