



Murphy Group (RO: 1953)

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## **SHLPEIP MATTERS 10 AND 11**

Infrastructure and Delivery and Monitoring and Implementation





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Implementation

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## **SHLPEIP MATTERS 10 AND 11**

Infrastructure and Delivery and Monitoring and  
Implementation

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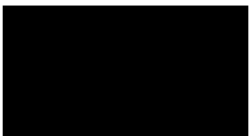
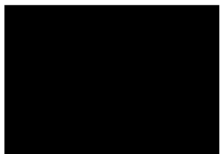
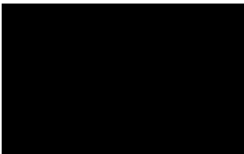
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# 1

## **INTRODUCTION**





# 1 INTRODUCTION

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- 1.1.1. WSP has prepared this Hearing Statement on behalf of Respondent ID RO 1953: Murphy Group.
- 1.1.2. An introduction to Murphy Group and a plan showing its land holdings in St Helens and adjacent to St Helens were appended to Hearing Statements Matters 1-3.
- 1.1.3. The Regulation 19 representations are contained from page 222 onwards in SD00821. The representations sought to re-designate 1HS (owned by Murphy Group) as an additional housing allocation.
- 1.1.4. This Statement raises concern that developer contributions won't deliver the infrastructure required.
- 1.1.5. This Statement also concludes that the monitoring framework is inadequate; more stringent commitments to review the plan and to find alternative ways to increase housing supply are required; more allocations and the introduction of Plan B sites are appropriate solutions.



2

**QUESTIONS**





## 2 QUESTIONS

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### 2.1 ISSUE 1: DEFINITION AND SCOPE OF INFRASTRUCTURE REQUIRED

*1. In general terms will Policy LPA08, the IDP and other policies of the Plan, including allocation policies, ensure that necessary infrastructure is delivered and in a timely fashion?*

- 2.1.1. The inclusion of section 6 to LPA08 implies that there is a profound risk that necessary infrastructure will not be delivered. If delivery wasn't at risk of failure due to viability, there would be no need to differentiate bullets i) and ii). This may be acceptable in terms of proposed developments on non-allocated sites, but it would be a remarkable failing if the allocated sites did not deliver the necessary infrastructure on the grounds of viability.
- 2.1.2. It is a notable omission that allocation 4HA and its policy (SD001 page 233) does not require the delivery of schools, health care, community facilities or playing fields in association with almost 3,000 new homes.



## 2.2 ISSUE 2: DEVELOPER CONTRIBUTIONS

*8. Is the approach set out in Policy LPA08 effective and does it strike the right balance between flexibility and certainty for applicants?*

- 2.2.1. PPG (Paragraph: 001 Reference ID: 10-001-20190509) advises that “policy requirements should be clear so that they can be accurately accounted for in the price paid for land.”
- 2.2.2. There is a risk that applications – including applications to develop allocated sites – might not provide the full suite of developer contributions necessary, because of viability.
- 2.2.3. The policy should be tighter in this regard, at the very least to ensure the development plan secures the effective delivery of all infrastructure necessary to make a development acceptable.

## 2.3 ISSUE 4: GREEN INFRASTRUCTURE (GI)

*19. Is the threshold of 40 dwellings for the provision of open space positively prepared, justified and consistent with national policy?*

- 2.3.1. At 30dph, a 40-house scheme would be accommodated on a site of approximately 1.3 hectares. Good urban design and regard to amenity, health and wellbeing should mean that smaller schemes should still incorporate some open space.
- 2.3.2. It is also concerning that the requirement for new open space is only triggered in circumstances where there is either a local deficiency or where the need arising cannot be met in the existing provision.
- 2.3.3. Instead, all residential developments of more than 10 dwellings should include for some open space as a default position, unless site and local circumstances demonstrate this is not practical or necessary.

*20. Is this approach justified and effective?*

- 2.3.4. The LPA's approach has not been justified.

*21. Is it clear from the policies in the Plan what level of new provision for outdoor sport, strategic housing allocations will be expected to provide?*

- 2.3.5. No. The plan is a missed opportunity to plan positively to increase the quantity and improve the quality of outdoor sport facilities. Proposed MM054 would assist in this regard, but the strategic allocations should reflect the evidence on local shortfalls in provision.

*22. Will the recently commissioned update to the Playing Pitch Strategy and Action Plan be able to inform the policies and proposals within this Plan?*

- 2.3.6. Yes, but the findings of it may affect viability of sites and / or capacity of sites.

## 2.4 ISSUE 6: MONITORING AND IMPLEMENTATION

*26. Taking into account any modifications, is the Plan clear in indicating how the Plan's policies and proposals will be monitored?*

*27. Will the indicators in the monitoring framework be effective in monitoring the success of the Plan's policies and proposals?*

2.4.1. In answer to both 26 and 27 - no. Other contingencies are needed apart from "considering" a review of the local plan, when a 5YLS cannot be demonstrated. Plan B sites, as advocated in Murphy Group Hearing Statement Matter 3 would be a justified and positive step to resolve problems with land supply without waiting for a review of the local plan to proceed and conclude.

2.4.2. The suggested modification on page 113-114 of SHBC010 partly misunderstands the circumstances in which a 5YLS won't be demonstrable; the first modification refers to delivery of sites post-permission, which will have at best a minor effect on 5YLS. More sites and permissions are the real solution to any such problem.

2.4.3. The final modification on page 114 of SHBC010 on this issue is also ineffective, and actually worsens the effect of the monitoring process; "a long-term underperformance against the 5 year supply" is not defined, but because a plan should be reviewed after five years anyway, this needs rewording so that the review definitely commences quicker. A maximum of two years of failure in this regard should be the trigger, unless the plan is modified prior to adoption to introduce Plan B sites.

*28. Is the LP clear as to when a need to update the Plan before five years would be triggered, for example, for reasons relating to the delivery of housing?*

2.4.4. No. A review will be "considered" if land supply drops, but that terminology is too loose.

2.4.5. If included within the plan, Plan B sites should be drawn down in this circumstance, ahead of any Local Plan review being initiated. With the Council already relying on a high number of SHLAA sites AND small site windfalls to try and achieve a five-year supply, there are no additional tools at the Council's disposal to increase the supply of housing. This reinforces the need for further allocations and the need for Plan B sites, in order for the plan to be effective and positively prepared.



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