



Barratt Homes (RO1944)

ST HELENS LOCAL PLAN EXAMINATION

Matter 4 – Allocations, Safeguarded Land and
Green Belt Boundaries





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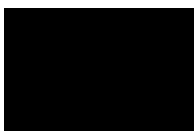

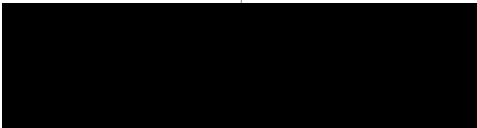
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INTRODUCTION



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 4 (Allocations, Safeguarded Land and Green Belt Boundaries), specifically in relation to:
- Issue 3 (Florida Farm North (2EA), Land North Of Penny Lane (3EA), Land South Of Penny Lane (4EA), Land To West Of Haydock Industrial Estate (5EA), Land West Of Millfield Lane, Haydock (6EA), Land At Florida Farm, Haydock (2HA), And Land North-East Of Junction 23 (M6), Haydock (2ES)) – Questions 20, 21, 23, 24, 25, 27, 28 and 29.
- 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 20 – the Green Belt assessments support the allocation of Site 2HA;
 - Question 21 – exceptional circumstances have not been clearly articulated;
 - Question 23 – the configuration and scale of Site 2HA is justified;
 - Question 24 – there are no adverse impacts of developing Site 2HA which would outweigh the benefits;
 - Question 25 – the requirements for Site 2HA are not positively prepared or effective;
 - Question 27 – the minimum density and indicative site capacity for Site 2HA have not been positively prepared and are not effective or justified;
 - Question 28 – yes, in our view, infrastructure will be delivered at the right time and place to support Site 2HA;
 - Question 29 – there are no barriers to Site 2HA coming forward.
- 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 Wednesday 9 June 2021.



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QUESTIONS



2. QUESTIONS

2.1. ISSUE 3: LAND AT FLORIDA FARM, HAYDOCK (2HA)

QUESTION 20

Q20. Do the Green Belt assessments support the allocation of Sites 4EA, 5EA and 6EA and Site 2HA and the safeguarding of Site 2ES and demonstrate exceptional circumstances for the removal of the land from the Green Belt?

- 2.1.1. Yes, in our view, the Green Belt assessments support the allocation of Site 2HA and exceptional circumstances have been demonstrated for the removal of land from the Green Belt (as set out in our Matter 2 statement). Therefore, the Plan is **positively prepared, justified** and **consistent with national policy** in this regard.
- 2.1.2. Barratt strongly support the allocation of 2HA, as evidenced in the Council's Green Belt assessments:
- The Draft Green Belt Review (December 2016) [GRE001] initially assessed the parcel of land (ref. GBS_006) and concluded that *"The site is really well contained with low Green Belt significance"* (p107);
 - The Green Belt Review (December 2018) [SD020] similarly concluded that the site (ref. GBP_060) *"makes only a moderate contribution to the purposes of Green Belt land"* (p319);
 - The Green Belt Stage 2B Proformas (January 2019) [SD021] likewise concluded that the site (ref. GBP_060) has *"Good Development Potential"* (p138).
- 2.1.3. Of all sites assessed as part of the Green Belt review process, 2HA is one of the lowest contributing sites to the Green Belt. This is self-evident given that the site is surrounded by existing development, well contained by robust, defensible boundaries, technical constraints can be mitigated, and significant benefits can be delivered.
- 2.1.4. Since the assessments were undertaken, the Amazon and Kellogg's warehouses have been built at Florida Farm North (Site 2EA) opposite (ref. P/2016/0608/HYBR). This further erodes the five purposes of the Green Belt in paragraph 134 of the National Planning Policy Framework ("NPPF") and strengthens the case that the site should be released from the Green Belt. Exceptional circumstances have therefore been demonstrated in accordance with paragraph 136 of the NPPF.

QUESTION 21

Q21. If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?

- 2.1.5. We recommend that text be added to articulate the demonstration of exceptional circumstances to aid future readers of the Plan (including applicants and decision makers). This would help ensure the Plan is **justified** and **effective**.
- 2.1.6. Barratt consider that this amendment could be dealt with through a main modification ("MM").

QUESTION 23

Q23. Is the configuration and scale of the allocations and safeguarded land justified taking into account development needs and the Green Belt assessments?

- 2.1.7. Notwithstanding that we have concerns with indicative site capacity (as we set out in response to Question 27), in our view, the configuration and scale (in terms of land take) of 2HA is **justified**.
- 2.1.8. The site is surrounded by existing development and well contained by robust, defensible boundaries and it would not be justified to allocate a smaller area of land.
- 2.1.9. The allocation of an additional non-Green Belt parcel (2HA_B) is also justified to facilitate primary vehicular access to the wider allocation (2HA_A) from Vicarage Road.
- 2.1.10. An illustrative masterplan (**Appendix A**) has been prepared by Barratt having regard to the site's features and technical constraints. Barratt has since undertaken more technical and design work which demonstrates that the scale and configuration of the proposed allocation will enable the delivery of up to 600 homes.

QUESTION 24

Q24. Would the adverse impacts of developing Sites 4EA, 5EA and 6EA and Site 2HA (Green Belt impacts, landscape impacts, highway safety, flood risk, agricultural land, air quality) outweigh the benefits?

- 2.1.11. In our view, there are no adverse impacts from developing Site 2HA which would outweigh the significant benefits. Therefore, we believe that the Plan has been **positively prepared** and is **justified** in this regard.

Benefits

- 2.1.12. In addition to our representations, a 'Sustainability Statement' (October 2017) (**Appendix B**) was prepared to help support the allocation by articulating the overall accessibility and suitability of the site for housing, and to summarise the key benefits that will arise from development in this location.
- 2.1.13. At a district level, the Council has an ambitious growth agenda which relies on Green Belt release, including around Haydock. The site is in a highly sustainable location in which to direct some of this growth. It provides the opportunity to deliver new homes, which will not only build on existing linkages and access to employment, services and facilities, but will also deliver significant socio-economic benefits in the locality and wider St.Helens area.
- 2.1.14. Barratt is committed to the delivery of Florida Farm South and will continue to work with St.Helens Council, and engage with stakeholders and the local community, to ensure that the proposals meet the aims and aspirations of the Local Plan and wider community, and to inform work on more detailed proposals for the site (through a planning application) in due course.

Impacts

- 2.1.15. Delivering homes has been identified as a critical objective both in St.Helens and at the national level. Balancing this objective with some harm is key to bringing new homes forward.
- 2.1.16. We support the Council's assessment of potential impacts, including the findings of the Sustainability Appraisal (January 2019) [SD005, SD005.3], as illustrated by Figure 2-1. The site (ref. 53) scored well ('green' or 'amber') against most criteria, and only scored 'red' on landscape sensitivity, evidencing that development would only have limited impact on the local area.
- 2.1.17. The report (p50) concluded:

“The site is adjacent to residential development and in a sustainable location with good access to employment and services. There are potential noise and landscape issues, but these can be mitigated.”

Figure 2-1 – Sustainability Appraisal - Summary of Findings [SD005, SD005.3]

Site ID	GB ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3. Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridge/line	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
53	GBP_060	Land at Florida Farm, Slag Lane, Haydock, WA11 0UZ	Blackbrook	Site 2HA																					

- 2.1.18. Sitting alongside the Council’s evidence, Barratt has undertaken its own initial technical work and due diligence, which reveals that there are no adverse impacts from developing the site which cannot be mitigated:
- Reports on highways, flood risk and drainage are contained within the ‘Sustainability Statement’ appendix (**Appendix B**);
 - Arboricultural design note (**Appendix C**);
 - Ecological Survey and Assessment (including a bat survey) (**Appendix D**)
 - Supplementary technical notes on highways (in response to Questions 24, 28 and 29) (**Appendix E, F and G**).
- 2.1.19. Updated full technical surveys and investigations will be undertaken in support of a planning application.
- Green Belt**
- 2.1.20. Site 2HA has been assessed as one of the lowest contributing sites to the Green Belt (as per our response to Question 20).
- 2.1.21. It is an infill site which is surrounded by existing development. Residential uses bound the site on three sides, and it is well contained by the East Lancs Road on the remaining boundary which forms a robust physical barrier. Beyond this to the north, the large-scale Amazon and Kellogg’s warehouses have been built at Site 2EA opposite (ref. P/2016/0608/HYBR). This strengthens the case that the site should be released from the Green Belt as it no longer performs any of the five purposes contained in paragraph 134 of the NPPF.
- 2.1.22. Exceptional circumstances have therefore been demonstrated in accordance with paragraph 136 of the NPPF.

Landscape

- 2.1.23. SD021 assessed Site 2HA as having a 'medium to high' landscape land and visual sensitivity, but this is partly due to its classification as a greenfield site. However, as recognised by SD005, the impact can be mitigated, including through Policies LPA09, LPC05, LPC07, LPC10 and LPD03, and as demonstrated by the illustrative masterplan (**Appendix A**).

Flood Risk

- 2.1.24. The Flood Risk Assessment and Drainage Strategy (see appendix 1 within **Appendix B**) undertaken in October 2017 demonstrates that Site 2HA is located predominantly within Flood Zone 1, with part of the south-east corner in Flood Zone 2 associated with overland runoff from Florida Farm North (2EA).
- 2.1.25. As predicted by the report, the extent of Flood Zone 2 will have been significantly reduced by the development of Amazon and Kellogg's (ref. P/2016/0608/HYBR), which provide restriction of run-off rates to the average annual event.
- 2.1.26. The report also found the site to be at low risk of flooding from tidal, groundwater, sewers and artificial sources. In addition, development of the site can provide significant betterment to downstream catchments by the restriction of run-off, which would mitigate this issue.

Highway Safety

- 2.1.27. A separate highways response has been prepared to this Question (**Appendix E**). This concludes that there are no adverse highway and transport impacts which would outweigh the significant benefits of developing Site 2HA.

Agricultural

- 2.1.28. SD021 assessed Site 2HA as being Grade 3: 'good to moderate agricultural land'.
- 2.1.29. Whilst this is classed as 'amber' in SD005, the loss of agricultural land on Site 2HA will be minimal in the context of the wider remaining agricultural land in the Borough – the majority of which is located in the Green Belt. This is just one consideration alongside a range of other factors that need to be weighed up in the 'planning balance'.

Air Quality

- 2.1.30. SD021 identified no issues regarding air quality on Site 2HA, but a nearby junction to the east (East Lancashire Road and Stanley Bank Way) is being monitored for air quality management purposes.
- 2.1.31. The Council's Environmental Health department added that there could be potential impacts on residential development along the A580, and that a 'stand-off' distance from the road would be calculated and assessed at planning application stage. This issue can therefore be mitigated, as demonstrated by the illustrative masterplan (**Appendix A**).

Other Impacts

- 2.1.32. An Ecological Survey and Assessment (including a bat survey) (**Appendix D**) has been undertaken which demonstrates that development at Site 2HA will provide an opportunity to secure ecological enhancement for fauna typically associated with residential areas (such as breeding birds and roosting bats).

QUESTION 25

Q25. Are the requirements for Sites 4EA, 5EA, 6EA, 2HA and 2ES within Policies LPA04.1 and LPA05.1 and Appendices 5 and 7 (Site Profiles) positively prepared and effective?

- 2.1.33. Whilst we fully support the allocation of Site 2HA, in our view, the requirements of Policy LPA05.1 and Appendix 5 (Site Profiles) as submitted are **not positively prepared or effective**.
- 2.1.34. We are pleased to note the proposed removal of several criteria under the 'Site Profiles' within Annex 1 of the Draft Schedule of Modifications (May 2021) [SHBC010]. We do not disagree with the need to set out site specific requirements, but any requirements which are generic and cross reference other policies of the Plan represent unnecessary duplication which should correctly be excluded from the Site Profiles.
- 2.1.35. Barratt therefore agrees with the proposed amendments to the Site Profile for Site 2HA within MM005.
- 2.1.36. As regards the remaining unchanged site-specific requirements following MM005 (highways access, sustainable transport measures and flood management), for the avoidance of doubt it can be confirmed that these have been factored into Barratt's proposals and will be addressed through a future planning application. The only exception is that it would not be possible to provide a link through to Brookside Way (given that it is in third party ownership), and therefore this point ought to be omitted from MM005.

QUESTION 27

Q27. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities within Tables 4.1, 4.5 and 4.8 justified and effective?

- 2.1.37. Whilst we agree with the indicative site area, appropriate use and net developable area for Site 2HA, in our view, the minimum density and indicative site capacity have **not been positively prepared** and are **not effective or justified**.

Minimum densities and indicative site capacities

- 2.1.38. As stated in our Matter 3 statement (in response to Question 2), there is contradiction in the reasoned justification to Policy LPA05 at paragraph 4.18.14. 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.
- 2.1.39. In our view, imposing set densities can negatively impact site delivery. We have requested that the Policy 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 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.
- 2.1.40. For comparison purposes, the illustrative masterplan (**Appendix A**) showed that, based on the understanding of the site in August 2017, 526 homes could be delivered, which would equate to a density of 30 dph. Barratt has since undertaken more design work which would support delivery of up to 600 homes, at a density of 34.5 dph.

- 2.1.41. The Council has previously been provided with the illustrative masterplan (**Appendix A**) alongside initial technical feasibility studies (**Appendices B-E**), which support deliverability of Site 2HA in the short term alongside a higher scale of development.
- 2.1.42. Notwithstanding this, further technical surveys and more detailed design work will be undertaken in support of a planning application, which could change these conclusions and therefore more flexibility is required in the Plan.
- 2.1.43. Site 2HA's indicative capacity should therefore be updated to 600 units to take account of this and help address the anticipated uplift in housing requirements (as set out in our Matter 2 Statement).
- 2.1.44. Barratt recommends that these amendments should be dealt with through MMs.

QUESTION 28

Q28. Will infrastructure to support the allocations, including improvements to Junction 23 (M6), be delivered at the right time and in the right place?

- 2.1.45. Yes, in our view, infrastructure will be delivered at the right time and place to support the delivery of new homes at Site 2HA.
- 2.1.46. There are good existing connections to services including electricity, gas, water and sewerage and broadband. Barratt has confirmed this by liaising with utilities providers (including Electricity North West, National Grid and United Utilities). The outcomes of these discussions have been factored into the development costs and construction programme and will not delay the site's delivery.
- 2.1.47. The Infrastructure Delivery Plan (October 2020) [SD013] corroborates this conclusion and identifies very few infrastructure requirements (beyond typical enabling and site preparation works) to serve Site 2HA, aside from the potential improvement works to Junction 23 of the M6 ("Haydock Island").
- 2.1.48. In terms of highways infrastructure, a separate response has been prepared on this point (**Appendix F**), which should be read alongside the response to Question 24 (**Appendix E**)
- 2.1.49. In summary, it is considered that there is no direct need for additional highways infrastructure (beyond provision of two new site accesses and sustainable transport measures) to support the allocation of the site. This position is based on the specific assessments undertaken and presented within the technical note and also the wider assessments presented in the Transport Impact Assessment (January 2019) [TRA003], which identify the ability of the local network to accommodate this and other local site allocations.
- 2.1.50. It is also considered that, based on the reasons identified above, and due to Site 2HA having a very limited impact on Haydock Island (less than one-additional vehicle movement per minute), the specific reference to improvement at Junction 23 is not relevant to this site. Therefore, the development of Site 2HA would have no bearing on the delivery or required timing of improvements to this motorway junction.

QUESTION 29

Q29. Are there any barriers to Site 2HA coming forward as anticipated by the housing trajectory?

- 2.1.51. There are no barriers to Site 2HA coming forward. In our view, the proposed housing trajectory is **not justified** and therefore the Plan is **not effective or positively prepared** in this regard.

- 2.1.52. Table 4.5 of the Housing Needs and Supply Paper (October 2020) [SD025] set out the Council's anticipated lead-in times for sites in its supply. For sites without permission, there is an assumption that it will typically take 2.5 years before the first homes are built.
- 2.1.53. However, we are concerned that paragraph 4.22 of SD025 applies an exception in our case:
"For site 2HA, a lead in time of 4 years has been applied to allow for the completion of the ongoing M6 Junction 23 Study and any subsequent follow-on work"
- 2.1.54. This is an alarmingly vague and unsubstantiated statement. No further elaboration has been provided by the Council to explain precisely what *"subsequent follow-on work"* may be required. We are unaware of any published technical work or other evidence that has been submitted to the Examination which justifies this position.
- 2.1.55. Furthermore, we note from the latest housing trajectory contained within the Updated Employment and Housing Land Supply Position as of 31.03.2021 (May 2021) [SHBC007] that the anticipated first completions on the site have been pushed further back to 2027/28. Assuming adoption takes place in 2021/22, 2027/28 would equate to 'Year 6' of the Plan, which is an additional two-year delay that has not been justified.
- 2.1.56. Barratt is firmly of the view that there is no evidence to support such an unreasonable delay in lead-in times. It contradicts the Council's own assumptions and requirements. For example, there is no reference to Haydock Island improvements in the latest update to the Site Profiles contained in Appendix 5 (MM005).
- 2.1.57. Barratt is a willing developer who has had control of Site 2HA for over five years. Over this timeframe it has been undertaking extensive due diligence into the site's constraints and opportunities. It has proactively engaged with key stakeholders (including utilities providers and the Council itself) to ensure that any issues are identified early on and capable of being addressed or mitigated through the site's development.
- 2.1.58. Barratt is keen to work with the Council to move the site forward and has programmed in the submission of a planning application immediately upon adoption of the Plan (or sooner if a positive Inspectors' Report is received) to enable a start on-site within the immediate five year period, facilitating the delivery of much needed homes in the short to medium term.
- 2.1.59. In respect of the reference to *"completion of the ongoing M6 Junction 23 Study and any subsequent follow-on work"* in SD025, a separate highways response has been prepared to this Question (**Appendix G**).
- 2.1.60. From a highways perspective, there are no barriers to Site 2HA's delivery and there are no reasons why it cannot come forward in advance of the housing trajectory. In highways terms at least, the envisaged trajectory in SD025 and SHBC007 should have no bearing on the delivery or required timing of the development of the site.
- 2.1.61. Even when all 600 homes are built and occupied, this would result in less than one additional vehicle movement per minute passing through Junctions 23 and 24 of the M6 from Site 2HA. Therefore, the site's development will have very little influence on Haydock Island (or the need for improvement there) and vice versa.
- 2.1.62. It should also be noted that any future proposed development on the site will be the subject of a planning application, which will include a comprehensive Transport Assessment. This will

comprehensively detail the impact of the development on the highway network, following which discussions and agreement with the local planning and highway authority will need to be undertaken on whether any further junction improvements are required, and the extent of these. Existing policies within the Plan already cover this (including Policy LPA07) and therefore there is no basis for introducing further requirements or restrictions.

- 2.1.63. Given that Barratt has already undertaken initial technical and design work which does not give rise to any abnormal concerns, and is updating this in anticipation of submitting a planning application immediately upon adoption of the Plan (as explained in response to Question 24), it is not unrealistic to expect that the site will start to yield completions sooner, and certainly within the first five years.
- 2.1.64. We provide alternative delivery rates in Table 2-1, which set out that, based on gaining planning consent in April 2022, Barratt can provide the necessary roads and site infrastructure by November 2022 and the first homes will be completed by May 2023. Thereafter, Barratt intend to ‘dual outlet’ the site (enabling homes to be simultaneously built and sold under both the Barratt Homes and David Wilson Homes brands) to achieve a total of 90 dwellings per annum (“dpa”).
- 2.1.65. To aid the Inspectors, we have also provided a comparison of the impact of Barratt’s conclusions on the housing trajectory for this site. Barratt is confident that it can deliver higher completions and much sooner than the Council’s assessment. Crucially it should be noted that the site can be fully built out within the Plan period (i.e. prior to 2037)

Table 2-1 – Site 2HA – Housing Trajectory Comparison

Year	St.Helens Council Build Out Rates ¹	Barratt Homes Build Out Rates	Comparison
2021/22	0	0	0
2022/23	0	0	0
2023/24	0	45	+45
2024/25	0	90	+90
2025/26	0	90	+90
2026/27	0	90	+90
2027/28	22	90	+68
2028/29	45	90	+45
2029/30	45	90	+45
2030/31	45	15	-30
2031/32	45	0	-45
2032/33	45	0	-45
2033/34	45	0	-45
2034/35	45	0	-45
2035/36	45	0	-45
2036/37	45	0	-45
Post 2037	95	0	-95
Total	522	600	+78

¹ Updated Housing Land Supply Position (May 2021) [SHBC007]

- 2.1.66. In conclusion therefore, based on the reasons identified above, the Council's claims in SD025 and SHBC007 should have no bearing on the delivery or required timing of the development of Site 2HA.
- 2.1.67. Barratt would strongly resist any suggestion to introduce any unsubstantiated statements (to restrict the immediate development of Site 2HA) within the Plan, as to do so would **not be positively prepared, justified, effective or consistent with national policy.**