



ST HELENS
BOROUGH COUNCIL

**ST HELENS BOROUGH
LOCAL PLAN 2020-2035**

**ST HELENS BOROUGH COUNCIL'S RESPONSE
TO INSPECTORS MATTERS ISSUES AND
QUESTIONS**

**Matter 2 – Housing and Employment Needs and
Requirements**

SESSION 2 – 9:30 WEDNESDAY 26 MAY 2021

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Matter 2: Housing and Employment Needs and Requirements

(Policies covered: LPA02, LPA04, LPA05)

Issue 1: The Local Plan Timeframe

- 1. Are there any comments on the alternative end dates of 2035 (submission) and 2037 (possible MM)?*

The Council acknowledges the issue of not being able to achieve a 15 year period from the point of adoption, in accordance with the NPPF, should the end date of the plan period remain 2035.

The Council considers a plan period end date of 2037 is sufficient to ensure a 15 year outlook from the point of adoption. As set out in response to PQ24 in SHBC001, it is considered this could be addressed through a main modification.

- 2. Are there any comments on the implications of extending the period in such a way, particularly for the housing and employment land requirement, taking into account the Council's comments?*

The Council has set out what it considers to be the implications of extending the plan period in this way in response to PQ25 in SHBC001, and has no further comments to add to this.

However, it should be noted that the detailed numbers in terms of the residual housing and employment requirements have been updated to provide the position as at 31 March 2021 (the residual figures in response to PQ25 of SHBC001 relate to the position as at 31 March 2020). The updated figures will be provided to the Examination separately.

- 3. Are the different base dates for employment land and housing requirements justified?*

Yes, the Council considers the different base dates are justified on the basis that it is important to retain a 2012 base date for the employment land requirements. As the Council sets out in response to other questions, particularly in relation to Matter 2, Issue 3 questions, the provision of employment land in the Borough has been constrained since 2012 due to a lack of suitable sites that are attractive to the market (with the exception of 2018/19 and 2019/20 when further land was made available through planning consents, and there was a consequent spike in employment land take-up). The ELNS Report (2015 (EMP002) and Addendum Report (2019) (EMP001) provides a more detailed explanation of why a 2012 base date is considered appropriate.

To move the employment base date to 2016 to match the housing requirement base date would result in the Plan not taking account of the under-provision of employment land between 2012 and 2016, when there was clearly demand. To not take account of this in the Plan would cause concern that the Plan has not been positively prepared, because it has not sought to meet the objectively assessed employment needs of the Borough.

4. Would a consistent base date for the Plan of 1 April 2016 have any implications for the Plan in relation to meeting the area’s objectively assessed needs, particularly relating to employment?

Yes, the Council has set out a detailed response to this in PQ28 of SHBC001, and the principle remains the same, ie. moving the base date from 2012 to 2016 removes 23.2 ha (or 11.6ha if plan period is extended to 2037) from the OAN requirement, which has a notable impact on the associated residual employment requirements.

However, the residual employment figures provided in SHBC001 were based on the position as at 31 March 2020. The latest employment monitoring data to 31 March 2021 is now available, so the figures are updated as follows, and based on a plan period to 2037:

Residual Employment Land Requirement 2021-2037 (as of 31.03.2021) based on 2012 base date:

Requirement	Hectares
Local Plan OAN 2012-2037 including 5 year buffer and allowance for Parkside SRFI and SuperPort	239
Take-up between 1 April 2012 and 31 March 2021 (includes completions at Local Plan Proposed Allocation sites 2EA (Florida Farm, Slag Lane Haydock), 3EA (Land North of Penny Lane, Haydock) and 10EA (Land at Lea Green Farm West, Thatto Heath))	60.77
Existing Supply of Deliverable Employment Land (31 Mar 2021) (This is made up of Land North of Kilbuck Lane (3.46ha) and Pilkingtons Cowley Hill Site (0.58ha))	4.04
Total Residual Requirement 2021-2037	174.19

Residual Employment Land Requirement 2021-2037 (as of 31.03.21) based on 2016 base date:

Requirement	Hectares
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Local Plan OAN 2016-2037 including 5 year buffer and allowance for Parkside SRFI and SuperPort	215.8
Take-up between 1 April 2016 and 31 March 2021 (includes completions at Local Plan Proposed Allocation sites 2EA (Florida Farm, Slag Lane Haydock), 3EA (Land North of Penny Lane, Haydock) and 10EA (Land at Lea Green Farm West, Thatto Heath))	58.4
Existing Supply of Deliverable Employment Land (31 Mar 2021) (This is made up of Land North of Kilbuck Lane (3.46ha) and Pilkingtons Cowley Hill Site (0.58ha))	4.04
Total Residual Requirement 2021-2037	153.36

As set out in response to PQ28, when discounting the proposed allocations that have already been completed (2EA, 3EA and 10EA) and discounting site 1EA that is allocated to meet Warrington's needs, the remaining proposed allocations total 182.52 ha.

When using the 2012 base date, this results in the proposed allocations totalling 8.33ha above the residual requirement (ie. $182.52 - 174.19 = 8.33\text{ha}$).

When using the 2016 base date, this results in the proposed allocations totalling 29.16ha above the residual requirement (ie. $182.52 - 153.36 = 29.16\text{ha}$).

Therefore, a change in the employment base date to 2016 for could have a significant implications for the employment land requirement and subsequently some of the proposed employment allocations, particularly given their current Green Belt status, and the associated need to demonstrate exceptional circumstances to justify their release, as set out in response to PQ30 of SHBC001.

Also, as set out in response to question 3 above, changing the base date to 2016 risks the Plan being unable to meet it's full OAN as required by the NPPF, because the evidence (EMP001 and EMP002) illustrates that a lack of suitable, market attractive land has been constraining supply in the Borough since 2012. The Plan has sought to address this by using 2012 as the employment base date, but the ability to do this will be impacted should the base date change to 2016.

Issue 2: Housing Need and Requirement

5. *Do the circumstances, particularly relating to economic growth, support the requirement for housing of 486 dpa as an uplift on the LHN figure?*

Yes, the Council considers the housing requirement figure of 486dpa is justified by the circumstances and based on a sound forecast of economic growth in the ELNS (2015) and Addendum (2019). It is considered that such an approach accords with both the NPPF and

the Planning Practice Guidance. Further detail is provided in the response to PQ29 of SHBC001.

Also, section 4 of the Strategic Housing Market Assessment Update (2019) (HOU001) provides the detailed justification of the uplift above the LHN figure based on an economic led housing need, and explains how the figure of 486 dwellings per annum was derived.

6. Should the housing requirement be further increased to take into account economic growth aspirations, choice and competition in the housing market and affordable housing need?

The housing requirement in the Plan is considered to be robust and strikes the right balance between providing sufficient homes to support economic growth ambitions, whilst respecting the need to protect the Green Belt in accordance with the NPPF, by not seeking to release more Green Belt than is considered absolutely necessary.

A higher housing requirement would inevitably require further Green Belt release (due to an insufficient supply of land in the urban area). It should also be noted that the housing requirement in the Plan is higher than the Local Housing Need calculated by using the standard method.

With respect to increasing the housing requirement to account for economic growth aspirations, this is not considered appropriate. The Council has provided a summary of the evidence that has informed the housing requirement (informed by the economic growth forecast) within section 3 of the Housing Need and Supply Background Paper (SD025). The evidence primarily comprises the ELNS and Addendum (EMP002 and EMP001) and the SHMA 2019 (HOU001). These have provided a thorough and robust assessment of the resulting housing requirement in the Borough, and have been informed by the specific context and circumstances in St Helens Borough.

The Background Paper (SD025) indicates in paragraphs 3.40-3.42 that some representations to the Plan considered that the proposed employment growth will create higher job growth, and therefore require a higher housing provision than is planned for in the LPSD. However, for the reasons set out in those same paragraphs, and as justified in the Council's evidence base, there is not considered to be a sound justification for such assumptions, particularly when it would result in the additional release of Green Belt, which must be justified by exceptional circumstances. Notwithstanding this, should such circumstances play out over the plan period, this would be picked up in a Local Plan Review, and addressed accordingly if required.

Affordable housing need is not considered a basis to increase the housing requirement. The SHMA (HOU001) considers affordable housing need to be 117 homes per annum over a 17 year period (2016-2033).

As set out in the Background Paper (SD025), paragraph 3.62, shows that between 2012 and 2020, affordable housing provision has averaged 127 dwellings per annum, and between 2016 and 2020, the average was 116.5 dwellings per annum. A further 276 affordable

dwellings were provided in the latest monitoring year (2020/21). Therefore, affordable housing provision is at the required level, so it is not considered justified to increase the overall housing requirement to provide more, particularly when considered in the balance against the need to protect the Green Belt.

It is considered that the Plan provides for a wide range of sites to provide choice and competition in the housing market, including a range of site sizes in the Local Plan allocations, as well as a variety of SHLAA sites in the urban areas. In addition, the overall supply of housing proposed in the Plan does exceed the minimum identified housing requirement, which provides for flexibility as well as additional choice and competition in the market. It is therefore not the case that the housing requirement should be increased to account for this.

To conclude, the Council does not consider that the housing requirement needs to be increased further, as there is no clear justification to do so.

7. Is the change in the housing requirement during the Plan preparation process justified?

Yes, there is nothing wrong in principle with adjusting the housing requirement throughout the Plan preparation process, including in response to the latest evidence, consultation responses and wider changing circumstances (such as national policy updates), where justified. Indeed, this is a fundamental part of the plan preparation process, and to not respond to a changing context could well result in an unsound Plan.

Paragraphs 3.45-3.48 of SD025 set out how and why the housing requirement evolved through the plan preparation process, including the consideration that there was 'no robust evidential basis to continue with a figure as high as 570 dwellings per annum' from the Preferred Options stage. This is particularly critical in the context of needing to justify exceptional circumstances to release further Green Belt land. Furthermore, both the ELNS and the SHMA are key parts of the evidence base, and support the housing requirement figure of 486 dwellings per annum set out in the LPSD.

Issue 3: Employment Need and Requirement

8. Is this employment land requirement justified and supported by the evidence?

The Council considers the employment land requirement is justified and supported by the evidence, specifically the ELNS 2015, and its 2019 addendum.

The methodology followed in preparing the ELNS reflects the approach outlined in the PPG, including modelling a range of scenarios. It looked at the local St Helens commercial property market, including direct discussions with local businesses and commercial property

agents. Furthermore, it considered St Helens' position within the broader LCR market. It is therefore considered robust.

The ELNS, and associated addendum (EMP002 and EMP001) provides clear explanation of how the employment land requirement has been derived, with a summary of the process provided in the Employment Land Need and Supply Background Paper (SD022), and further explanation and justification provided in St Helens Council's response to the Inspectors' preliminary questions (SHBC001).

The employment land requirement is based upon the OAN identified within the ELNS Addendum report of 239ha for the period 2012-2037, which has then been adjusted to reflect the plan period 2012-2035, resulting in a minimum requirement of 227.4ha as outlined in Table 4.3 of Policy LPA04 (based on the average growth scenario over the 1997-2012 period).

Table 4.2 of the Employment Background Paper (SD022) provided an update to the Residual Employment Land Requirement (LPSD, Table 4.4) to 31.03.20, and the following table updates the position a further year to 31.03.2021:

Residual Employment Land Requirement 2021-2035 (as of 31.01.2021)

Requirement	Hectares
Local Plan OAN 2012-2035 including 5 year buffer and allowance for Parkside SRFI and SuperPort	227.4
Take-up between 1 April 2012 and 31 March 2021 (includes completions at Local Plan Proposed Allocation sites 2EA (Florida Farm, Slag Lane Haydock), 3EA (Land North of Penny Lane, Haydock) and 10EA (Land at Lea Green Farm West, Thatto Heath))	60.77
Existing Supply of Deliverable Employment Land (31 Mar 2021) (This is made up of Land North of Kilbuck Lane (3.46ha) and Pilkingtons Cowley Hill Site (0.58ha))	4.04
Total Residual Requirement 2021-2035	162.59

9. How does the figure compare with trends in the past take-up of employment land?

In the preparation of the ELNS, historic take-up data was reviewed for the period 1997-2015, which had peaks and troughs, which is to be expected. Between this period the average figure for take-up was 4.86ha pa. A full breakdown of historic take-up can be found in Table 44 of the ELNS (EMP002).

Within this assessed timeframe, there was an identified growth period between 1998 and 2008, where the average annual growth was 7.5ha per annum, which was considered indicative of a more aspirational St Helens take-up scenario.

This is in stark contrast to the average 0.24ha pa delivered between 2012-2015, when take-up rates were notably reduced. The ELNS concluded this was caused by a lack of supply, rather than a lack of demand. On this basis, land take-up for the period 2012-2015 was excluded from the upper part of the OAN range forecasted. The 2019 ELNS Addendum Report (EMP001), in paragraph 2.22, recommended that the upper level is a better representation of the actual growth level if the market is without significant land supply constraints.

Therefore, the average take-up for the period 1997-2012, which is 5.79ha per annum (rounded to 5.8ha) is considered to provide the most robust picture of take-up trends over the economic cycle in St Helens Borough and has been used in the forecasting to inform the employment requirement.

Further clarity is provided in response to PQ33 of document SHBC001.

10. Is the Council's position that past take up is primarily due to a lack of supply of sites attractive to the market or are there other relevant considerations?

Yes, an inadequate supply of market attractive sites is considered the primary reason for low take-up between 2012 and 2017.

This is demonstrated by:

- the experience of other authorities in the same functional economic market area,
- the significant spike in take-up when further land was made available through planning permissions in 2018/19 and 2019/20,
- the response from stakeholders as part of the ELNS preparation, and
- the large number of planning applications received by the Council for large scale logistics developments since 2017, most recently at Omega, Parkside and Haydock Point North.

This is explained more fully in the Council's response to PQ31 and 32 of document SHBC001, along with section 2.11 of the ELNS Addendum report 2019 (EMP001) and section 4 of the Employment Land Need and Supply Background Paper (SD022).

11. Does comparing the situation in St Helens with neighbouring authorities indicate that there was a lack of suitably attractive sites?

Yes, as outlined in Figure 34 of the SHELMA (SUB001) the three neighbouring authorities of Halton (23%), Liverpool (21%) , Knowsley (21%) all experienced significantly more take-up of employment floorspace than St Helens (8%) between 2005 and 2015 this was due in part

to a lack of suitable available sites. In addition, Warrington saw 116.59ha of employment land which was predominantly B8 taken up between 2012-2016. Prior to the 2018-2020 increase due to the completion of sites 2EA, 3EA and 10EA in St Helens, the last large scale B8 take up was the 15.66ha taken up by Somerfield/Co-op distribution facility in 2002/03. The high take up in Warrington indicates there has not been an adequate supply of sites attractive to the market in St Helens.

Additionally, the St Helens Allocations Local Plan – Economic Evidence Base Paper (EMP003) concluded that none of the sites identified in the evidence base that supported the St Helens Core Strategy (2012) as potentially suitable for large scale distribution and manufacturing uses, satisfy the criteria suggested in that report as being preferred by the market for large scale uses. Consequently, at the time there was zero provision of suitable land for large scale distribution uses within the Borough's identified employment land supply. This shortage of available land to build large distribution facilities has meant that in recent years, when demand for such premises has been high, occupiers have had to locate elsewhere.

12. If a lack of suitable sites was a factor, is it realistic to assume that once the supply of sites is increased there will be a spur on development that will be above the forecast average rate to 2037?

Yes, the Council considers the assumption that once the constraints on land supply are released that there would be a spur on development above the forecast average rate to 2037 to be realistic. However, and as stated in the ELNS Addendum 2019, that acceleration of development would moderate in the medium term as the market returns to more typical levels, reaching a new equilibrium. The forecast is therefore considered realistic, and supportive of positive growth, whilst taking account of variances in demand over the full forecast period. More detail is provided in response to PQ38 of SHBC001.

The employment land take-up data presented in the Employment Land Need and Supply Background Paper (SD022) at Table 4.1 demonstrates the acceleration of development once further land was approved for development. While take-up averaged only 0.45 ha/yr between 2012/13 and 2017/18, when approvals were provided for schemes, primarily in Haydock, then this take-up accelerated, with 4.19 ha recorded in 2018/19 and 51.53 ha in 2019/20.

13. Can this be primarily attributed to an increase in the availability of sites or are there other relevant factors?

Yes, the upturn in the take-up of employment land post 2018 (55.72ha delivered between 2018 and 2020) is primarily attributed to the delivery of sites that have become available through planning permissions, including the completion of proposed allocations of 2EA and 3EA.

14. Is this approach justified?

Yes, the Council considers this approach is justified as the evidence suggests that take-up rates since 2012 have been suppressed by a restricted land supply.

This is supported by paragraph 27 of the PPG's Housing and Economic Needs Assessment section which states that future needs need to be based on data that is current and robust, including analysis of past take-up of employment land. As the analysis showed a significant decline in employment land take-up between 2012 and 2017, reflective of a lack of adequate market attractive supply, the ELNS therefore set out why it was appropriate to use the 2012 base date, ie. the ELNS Addendum 2019 (EMP001), paragraph 2.19 states "the take-up scenario in the ELNS based on the period 1997-2012 is likely to be a better representation of growth unencumbered by land shortages".

15. Would the inclusion of post-2012 take-up rates affect the historic baseline for predicting needs? If so how?

Yes. As there is evidence to suggest that take-up rates since 2012 have been suppressed by a restricted land supply, there is a risk that the inclusion of post-2012 take-up rates in a historic take-up methodology would distort the historic baseline for predicting needs, which is why the upper level of the OAN in the ELNS Addendum report 2019 was taken forward in the draft Local Plan. Using historic take-up rates as a basis for projecting future needs is only valid when past take-up is considered a reasonable indicator of future patterns. If past take-up has been suppressed by limited land supply, then taking the data from the suppressed years forward inherently assumes a suppressed market in future years, which is not what St Helens is seeking to achieve.

16. What would be the implications for the Plan if the OAN requirement were reduced by 4 (or 2) years?

Changing the base date of the employment land requirement from 2012 to 2016 would result in four years of demand unaccounted for in the employment land requirement, when there was clearly a need (2012-2016). This results in concern that by reducing the OAN by 4 or 2 years, the Plan may not be considered 'positively prepared' as required by the NPPF, because it is not "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs". This would have subsequent implications in terms of the reducing the residual employment requirement and associated proposed site allocations, as referred to in the response to question 18 below. Information is provided on the full, detailed implications in response to PQ28 and 30 of SHBC001.

17. How would these implications be addressed?

The best way to ensure the Plan takes account of the full demand for employment land is to retain 2012 as the base date to be used. This will mean the Plan is NPPF compliant and 'sound' in respect of it being positively prepared.

If the OAN requirement were to be reduced by 2 or 4 years, the Council would need to closely monitor employment supply and ensure the evidence on employment land needs is kept up to date, which may in turn trigger a Local Plan Review if it is considered there is insufficient supply to meet demand.

18. If changing the baseline date to 2016 affected the residual employment land requirement, what implications would there be for the Plan?

Changing the base date from 2012 to 2016 would reduce the residual employment land requirement reflecting the overall reduced employment land OAN requirement through removing 4 years (or 2 years should the plan period be extended to 2037) of need. This could subsequently have implications for some of the proposed employment site allocations, particularly in view of the proposals to release sites from the Green Belt, which requires exceptional circumstances to be proven. In summary, changing the baseline and retaining all the proposed allocations in the Plan results in total allocations exceeding the requirement by 26.83ha. This is a greater exceedance of the employment requirement compared to the modest exceedance when using the 2012 base date. Further detail is provided in response to PQ28 and 30 of document in SHBC001.

19. How would these implications be addressed?

It is the Council's preference that the base date is not changed from 2012 to 2016 to ensure sufficient employment land to meet demand is planned for. However, if the base date is changed, and the employment land requirement, and associated residual need reduced accordingly, the Council may need to review whether all the proposed allocations are still needed. However, any potential reduction in the employment land allocations would have a knock-on effect in terms of less employment land, and therefore less jobs, being delivered across St Helens Borough as a whole, and the wider Liverpool City Region. This may also trigger the need to review the balance between jobs and homes within the Local Plan.

Alternatively, and preferably in the Council's view should the base date be changed to 2016, the land allocated beyond the employment land requirement will provide flexibility in the Plan to respond to any requirement to meet LCR B8 strategic needs beyond the 65ha uplift already included within the employment requirement. This approach aligns with NPPF paragraph 81 that requires planning policies to be "flexible enough to accommodate needs not anticipated in the plan".

20. Does the recent data demonstrate that there is a strong demand for large-scale warehousing to serve the logistics sector?

Yes, as set out in response to PQ34 in SHBC001, the recent developments for large scale warehousing at Haydock and current applications at Omega West, Haydock Point and Parkside show a clear and strong market demand for large scale warehousing to serve the logistics sector. The employment land OAN was calculated using a baseline demand and an additional demand due to LCR and major projects factors. The baseline demand was calculated using historic take-up rates. The additional demand, which was seen as not accounted for through historic take-up, was in recognition of the increased role that St Helens is likely to play in the increased capacity at SuperPort and the intended SFRI at Parkside.

The additional demand based on the major projects element of the OAN was revised upwards in the ELNS Addendum 2019 to 55-65ha (from 30-40ha in the ELNS 2015), with ELNS Addendum (EMP001) in paragraph 2.21 attributing this to the sustained strength of this market, growing momentum around sites in St Helens, reporting of further land requirements at the Liverpool City Region level and potential earlier start of the Parkside SRFI than anticipated in the 2015 ELNS.

In addition, Paragraph 2.3 of the ELNS Addendum (EMP001) refers to discussions with commercial agents in the North West showing a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation.

Finally, paragraph 2.18 of the ELNS Addendum sets out that the warehousing and logistics market is performing strongly, with growth demands in the regional market, including in St Helens, there are substantial land requirements for large scale warehousing across the Liverpool City Region, which St Helens could play a significant role in providing for given its locational advantages, and planning applications and permissions suggest the market is on the cusp of a growth period.

Taking account of the above, it is reasonable to conclude that there is a strong demand for large scale warehousing for logistics and that this has been accounted for in the OAN for employment land.

21. Is this demand likely to be sustained during the Plan period on the scale envisaged by the land allocated for this type of development?

Yes, it is considered the demand will be sustained as envisaged through the delivery of the allocated sites. The evidence indicates that the market (through discussions with commercial agents) considers there to be substantial further demand for large logistics developments over the coming years, and St Helens with its locational advantages is well placed to contribute to meeting the demand.

The ELNS Addendum 2019 (EMP001), paragraph 2.24 expects that once constraints on land supply are released, there would be a spur on development above the forecast average rate to 2037. However, that acceleration is expected to moderate in the medium term as the market returns to more typical levels.

The employment requirement in the Plan is based on a long term review of past take up rates (prior to a lack of land supply constraining take up post 2012), and so it is considered reasonable that the demand will be there to sustain development on the level envisaged by the site allocations.

Further, as set out in response to PQ36 in SHBC001, for all the proposed allocations for large scale B8 uses, Policy LPA04 also identifies B2 as a suitable use. This will provide flexibility should demand for B8 employment land not come forward as expected in the Plan period for any reason.

22. Is this justified and consistent with national policy?

Yes, paragraph 31 of the PPG refers to the need to allocate space for logistics and the need for strategic facilities serving national or regional markets requiring significant amounts of land, good access to network and sufficient capacity to appropriate skilled labour. This is reflected in the ELNS's allowance for major projects (such as SuperPort and Parkside SRFI) within the identified OAN that are expected to generate additional logistics demand over and above the baseline OAN.

In addition, the approach is consistent with NPPF Paragraph 81 which states that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to ... local policies for economic development and regeneration."

Finally, paragraph 82 of the NPPF specifically references the needs of storage and distribution operations (the logistics sector) by stating, "Planning policies ... should recognise and address the specific locational requirements of different sectors. This includes making provision for ... storage and distribution operations at a variety of scales and in suitably accessible locations." The 55-65ha allowance for major projects added to the baseline demand accords with this.

It is therefore considered that the major projects allowance within the employment requirement is justified and consistent with national policy and guidance.

The justification for the 55-65ha major projects allowance is detailed in response to PQ37 of SHBC001.

23. Is the amount of land identified in addition to land that has already been identified to meet the needs of large-scale warehousing from the logistics sector (such as at Haydock and Parkside) justified?

Yes, the explanation and justification for adding further requirement to the baseline demand is set out in response to PQ37 of SHBC001, but in summary it is in response to the recognition of St Helens being likely to play an increased role in the Liverpool City Region due to high demand for large scale logistics sites, and the development of major freight infrastructure (increased capacity at the Port of Liverpool and the proposed Parkside SRFI) which would generate growth in demand for large scale warehousing, and manufacturers that are attracted to improved logistics assets in the region. Demand caused by this is anticipated to be over and above the baseline demand informed by historic take-up trends, justifying the need for an additional major projects and demand component in the identified employment requirement.

To emphasise the need for the additional major projects component in the employment requirement, when the ELNS Addendum reviewed the position, the latest evidence available justified an increase in the quantity of the major projects elements in the OAN (from 30-40ha in the ELNS 2015 to 55-65ha in the 2019 Addendum). The detailed explanation and justification for this is provided in the ELNS 2015 (EMP002), paragraphs 8.50-8.65.

In particular, the areas identified at Haydock and Parkside represent logical and attractive sites for large-scale warehousing in this corridor, with very good access to the M6 and A580. The Haydock sites are sites that support the expansion of the Haydock industrial area. The Parkside sites would enable the delivery of logistics uses around a SRFI.

24. Is there a risk that the potential for future growth in this sector may have been over estimated?

With regard to the baseline OAN demand, please see the response to PQ38 to SHBC001 (second paragraph specifically). The Council does not consider that the potential future growth of the sector has been overestimated. In summary, the forecast baseline growth in the employment requirement is based on take-up reflecting past growth rates over the 1997 - 2012 period, which incorporates periods of growth and recession. The additional major projects uplift is then added. Such a basis for the baseline forecast takes into account the likely variances in demand over the forecast period, and is therefore considered to be realistic in terms of supporting growth, rather than forecasting demand only on the basis of take up during a period of growth (1998-2008 as referenced in response to PQ33 of SHBC001).

Justification for the additional 65ha uplift is provided in response to the previous question (on the basis of the findings in the ELNS and Addendum). It is not considered that the potential for growth has been overestimated. Indeed, the estimate for this in the 2015 ELNS has since been increased through the 2019 Addendum on the basis of more recently available evidence. This is justified by the demand illustrated through recent planning applications in St Helens for such uses, as well as updated forecasts of large-scale warehousing demand in the Liverpool City Region. The evidence simply does not indicate that future growth for this sector has been overestimated. Indeed, paragraph 2.6 of the ELNS Addendum 2019 (EMP001) states “the overall market characteristics in 2017 are consistent to that being experiences at the time of preparing the ELNS in 2015. The anticipated dominance of the

warehousing market is still evident in 2017 and the latest information supports that this is the most likely sector to drive growth in St Helens and the broader North West region in years to come”.

The growth of the sector within St Helens must also be considered in the context of its acknowledged locational advantages near the intersection of the M62 and M6 motorways, as well as excellent train links making St Helens Borough an attractive location to the market.

As set out in paragraph 3.31 of the Employment Land Need and Supply Background Paper (SD022), the Council see the proposed employment allocations for logistics development in the Local Plan as being vital to assisting the delivery of the sub regional economic development objectives of the Government’s Northern Powerhouse agenda and also reflecting the LCR LEP’s support for logistics in association with Liverpool SuperPort. There is considered to be an evidenced need (as set out in the ELNS 2015 and ELNS Addendum Report 2019) to identify and allocate new land for logistics at commercially attractive strategic sites.

25. Is an additional 5-year buffer necessary, justified and consistent with national policy?

NPPF Paragraph 81 states that planning policies should “be flexible enough to accommodate needs not anticipated in the plan... and to enable a rapid response to changes in economic circumstances.”

As outlined in paragraph 8.12 of the ELNS (EMP002), the forecasting model builds in a buffer “to reflect a choice of sites by size, quality and location and to provide a continuum of supply beyond the end of the planning period”. Such an approach therefore ensures consistency with national policy as above.

The five-year buffer equates to approximately 25% of the base forecast. Percentage increases of between 20% and 30% are typical and accepted levels to account for the uncertainties of forecasting and the need to provide choice.

Therefore, the Council considers the use of the 5 year buffer to be necessary, justified and consistent with national policy.

26. How was the extent and nature of the buffer required identified?

The ELNS identified the buffer as 29ha based on the annual average take-up of 5.8ha per annum over the 1997-2012 period This can be seen in Tables 45 and 46 of the ELNS 2015 (EMP002). Five years is sufficient to provide some flexibility within the market and specifically considers typical development timeframes. This will help ensure that towards the end of the planning period there remains some choice of sites in the market.

27. Does the above likely timeline have any consequences for the Plan?

Please see the response to PQ42 of SHBC001 for the Council's response to this question.

In summary, the Council does not consider that the timescales for the Warrington LP will have consequences for the St Helens Local Plan for the reasons provided in SHBC001.

28. Is the provision of 31 ha of employment land to meet some of Warrington's needs justified?

The agreement for site 1EA (western extension of Omega to the south of the M62) to be allocated in the St Helens Local Plan has been agreed between the two Councils through the Duty to Co-operate process. This is summarised in the Duty to Cooperate Statement (SD009) under strategic matter 3 (pages 24-27).

It is also agreed in the draft SoCG between the two Councils (SD012) in paragraph 4.24 and the associated highlighted box 9, where it is stated that, "WBC has agreed, in principle that the Western extension of Omega in St Helens will contribute to meeting Warrington's employment needs ..."

As set out in response to PQ42 of SHBC001, there continues to be a high level of interest within and surrounding Warrington for large scale logistics development, and it is reasonable to assume that the Omega employment site (within Warrington Borough) will continue to be a focus for employment development. Therefore it is considered that the provision of 31ha at site 1EA towards Warrington's needs, which would form a logical extension of the existing Omega site, is justified, and has been agreed between the parties accordingly.

Issue 4: Alignment between housing and employment requirements

29. Is there sufficient evidence to indicate a clear alignment between housing and employment land requirements, particularly given the different base dates referred to above?

The housing requirement of 486dpa set out in the SHMA draws on the evidence provided by BE Group in the ELNS (EMP001 and EMP002), and therefore there is a clear alignment between the housing and employment requirements.

As set out in the SHMA (HOU001), section 4, the B class jobs growth anticipated in the Borough in the SHMA uses the jobs growth identified for such uses in the ELNS, based on a range of data to estimate the jobs yield of the Borough's employment sites. Non-B class jobs growth (which accounts for less than the B class growth) is derived from the SHELMA, with a notable proportion of this directly linked to the growth in B class employment (from the ELNS). This is due to jobs growth multipliers that reflect the fundamental economic

relationships which interlink the various elements of the forecast, so growth in B class employment has a knock on effect on non-B class employment (through increased commuting and leisure / retail spending etc), as explained in paragraph 4.5 of the SHMA.

The response to PQ43 of SHBC001 builds on the above explanation of the linkages between the SHMA and the ELNS evidence, and summarises how the housing requirement was derived from the growth forecast in the ELNS, demonstrating the clear alignment between the employment land and housing requirements.

With reference to the differing base dates, this is not considered to have any significant impact on the alignment between the housing and employment requirements. Whilst the employment land requirement uses a base date of 2012, it is important to note that very little of the employment need between 2012 and 2016 was delivered over that period due to the acknowledged employment land supply constraints (a total of 2.37ha over that four year period). Table 1 of the Employment Land Need and Supply Background Paper illustrates this. Therefore, the vast majority of the employment need is to be delivered post 2016, particularly on adoption of the Local Plan, once land supply constraints are addressed. The evidence (the ELNS and subsequently the SHMA) takes account of this. Therefore, there is a clear alignment between the timescales for delivering the employment land and the housing land identified.