

EiP Statement

St Helens Delivery and Allocations Local plan

Taylor Wimpey UK Limited

Representator ID RO1154

Our ref 41874/04/CM/BOC
Date May 2021

Subject Matter 3 - Spatial Strategy and Strategic Policies

1.0 Introduction

- 1.1 Lichfields is instructed by Taylor Wimpey UK Limited [TW] to make representations on its behalf to the St Helens Borough Local Plan 2020-2035 [SHLP].
- 1.2 This Statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 3 Examination in Public [EiP] hearing session.
- 1.3 Separate representations have been submitted in respect of the following Matters:
- 1 Matter 1 – Introduction to the Hearings, Legal Compliance, Procedural Requirements, and the Duty to Cooperate
 - 2 Matter 2 – Housing and Employment Needs and Requirements
 - 3 Matter 4 – Allocations, Safeguarded Land and Green Belt Boundaries
 - 4 Matter 5 – Housing Land Supply
 - 5 Matter 7 – Specific Housing Needs and Standards
 - 6 Matter 9 – Generic Policies
 - 7 Matter 10 – Infrastructure and Delivery
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the SHLP [Representator ID RO1154] as well as those made on other Matters listed above.
- 1.5 TW is seeking to bring forward a high quality, well designed and sustainable strategic residential site at Gartons Lane, St Helens [Local Plan Site Reference: 5HA] and a site at Gorsey Lane, St Helens which forms part of the wider Bold Forest Garden Suburb [Local Plan Site Reference: 4HA]. Taylor Wimpey is supportive of the allocation of the sites in the SHLP and considers that the identification of both sites as residential allocations will assist in boosting the supply of housing in St Helens. It will also assist in delivering sustainable development by contributing towards meeting the needs of market and affordable housing, creating employment during the construction period and mitigating any impact on the environment.
- 1.6 This statement expands upon TW’s previous representations made throughout the Local Plan preparation process in light of the Inspector’s specific issues and questions. Where relevant, the comments made are assessed against the tests of soundness established by the National

Planning Policy Framework and the National Planning Policy Practice Guidance [Practice Guidance].

2.0 Planning Issues

Issue 1: Previously developed land and housing densities

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

2.1 The Framework seeks to ensure that as much use as possible is made of previously developed or 'brownfield' land¹ and where there is an anticipated shortage of land for meeting housing needs, it is important to ensure that development makes optimal use of the potential of each site.

2.2 Although the SHLP is advocating the release of Green Belt sites to meet a proportion of its housing needs, it is considered that the Council has appropriately considered the deliverability and capacity of brownfield sites in the urban area. Policy LPA02 also sets out that the re-use of previously developed land will remain a key priority and will deliver a substantial proportion of new housing throughout the Plan period. Furthermore, viability of development is a key consideration in St Helens and significantly increasing the density of development to artificially inflate the claimed supply is likely to have an adverse impact on the viability of sites and result in under delivery over the plan period.

2.3 As such, it is considered that the Council has struck an appropriate balance between prioritising the re-use of previously developed land in key settlements and the selective release of sustainable and deliverable Green Belt sites to meet its full housing requirement.

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

2.4 §123 of the Framework sets out that planning policies should avoid homes being built at low densities and ensure that development makes optimal use of the potential of each site. With this in mind, Section 3 of Policy LPA05 seeks to set minimum densities depending on their location and general sustainability. Taylor Wimpey considers that the approach taken in the policy is acceptable and consistent with national policy. It allows development to be delivered at densities in excess of the minimum whilst also reiterating that new development 'should optimise the amount of housing developed on a site'. The densities proposed are generally consistent with the surrounding context in St Helens and with the densities being advocated for in the emerging and adopted policies of surrounding authorities as set out in Table 1.

Table 1 Surrounding Density Policies

Local Authority	Relevant Density Policy
Halton (Emerging Delivery and Allocations Local Plan 2019) – Plan currently subject to Examination	Policy CS(R)3: Housing Supply and Locational Priorities – 6) To ensure the efficient use of land, a minimum density on individual sites of 30 dwellings per hectare will be sought. In more accessible locations such a close to town, district or local centres or transport interchanges the presumption will be for developments achieving densities of 40dph or greater.

¹ §117 The Framework

Local Authority	Relevant Density Policy
Knowsley (Local Plan Core Strategy January 2016)	Policy CS3 (Housing Supply, Delivery and Distribution) – 5) Densities of a minimum of 30 dwellings per hectare will be required for residential development in Knowsley.
Sefton (A Local Plan for Sefton 2017)	HC3 (Residential Development and Primary Residential Areas) – 4) New residential development must achieve a minimum density of 30 dwellings per hectare of the net developable area
Cheshire West and Chester (Local Plan Part Two 2019)	Policy DM3 (Design, Character and Visual Amenity) – Design solutions will be supported that, where relevant: 2) respect and where appropriate enhance the prevailing layout, urban grain, landscape, density and mix of uses, scale and height, massing, appearance and materials.
Warrington (Proposed Submission Version Local Plan 2019)	A number of site-specific policies are set out in the plan with the majority stating that <i>‘to reflect the site’s location adjacent to the open countryside the development will be constructed to an average minimum density of 30dph’</i> .

Issue 2: Green Belt and Exceptional Circumstances

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

2.5 TW is of the opinion that the presence of Green Belt in St Helens does not provide a suitable reason for restricting the overall scale of development proposed by the Plan. Although, §11b of the Framework includes the presence of Green Belt as a justification for not meeting the minimum objectively assessed needs for housing and other uses in an authority area, there are no alternatives for meeting part of St Helens’ needs in adjoining authorities due to the presence of Green Belt there also. All authorities surrounding St Helens are constrained by tightly defined Green Belt boundaries and are all releasing Green Belt land through recently adopted or emerging Plans to meet their full housing and employment requirement.

2.6 It is also worth bearing in mind the Council’s response to the Preliminary Matters, Issues and Initial Questions (January 2021) which points out that the alternative of pursuing a housing and employment land requirement below the authority’s need was not considered appropriate as it would not deliver the strategic objectives of the plan and support regeneration and balanced economic growth.

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

2.7 The Framework is clear that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of Plans (§136). Furthermore, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development (§137). St Helens Council seeks to demonstrate exceptional circumstances for the alteration of Green Belt boundaries in Section 8 of Developing the Spatial Strategy Background Paper (October 2020).

- 2.8 Taylor Wimpey is of the opinion that exceptional circumstances have been demonstrated in St Helens to justify the release of land from the Green Belt for a number of reasons:
- 1 St Helens Council has identified a housing requirement slightly in excess of the minimum figure derived from the standard method but grounded on a sound economic growth scenario. Based on the identified housing requirement, the Council has an identified shortfall of at least 2,034 dwellings² over the course of the Plan period to 2035 (the shortfall is likely to increase as the plan period extends to 2037) which can only be accommodated through the release of sites from the Green Belt.
 - 2 St Helens Council has considered the potential of their urban sites for optimising densities. It is considered that this could only be achieved through the delivery of development of very high densities out of keeping with the character of St Helens and could result in the loss of recreational land and result in harm to infrastructure capacity in the urban area.
 - 3 As set out previously, the authorities surrounding St Helens are also constrained by Green Belt and are under similar development pressures to those being experienced in St Helens. Some of the Liverpool City Region authorities have already undertaken Green Belt Reviews (Sefton, Knowsley and West Lancashire) to meet their identified needs. Coupled with that, Halton and Warrington which form part of St Helens housing market area are also proposing Green Belt release through their emerging Local Plans. Finally, Wigan which bounds St Helens to the east is proposing to release Green Belt through the emerging 'Places for Everyone' Plan (formerly known as the GMSF). As such, surrounding authorities cannot accommodate any of St Helens development needs except through the release of land from the Green Belt.
 - 4 Finally, although the St Helens Core Strategy (2012) pursued a sole focus on delivering its development requirements within the urban area, there was an acknowledgement that some Green Belt release would be required for new housing development from 2022 onwards³.
- 2.9 As such, the requirements of national policy (§137) have been met and exceptional circumstances have been demonstrated.
5. *On the assumption that the housing and employment requirements are justified, has the quantum of Green Belt release been supported by proportionate evidence? For example, has effective use of sites in the built-up areas and brownfield land been fully explored, including optimising the use of such land?*
- 2.10 Taylor Wimpey is of the opinion that St Helens has explored the possibility of maximising the development potential of its urban supply and no alternative is available within St Helens to meet its housing requirement other than through the selective release of suitable Green Belt sites for development. As set out in the Council's Developing the Spatial Strategy Background Paper (October 2020), there are other considerations which must be factored in when considering the densification of development in the St Helens urban area. Over developing sites St Helens could lead to an unreasonable degree of 'town cramming', impacting the character of the built environment and leading to the loss of urban greenspace and putting additional pressure on existing services and infrastructure.

² §8.9 of Developing the Spatial Strategy Background Paper (October 2020)

³ Policy CH1 within the St Helens Local Plan Core Strategy

2.11 In determining the quantum of development which could be generated from sites in the urban area, to accord with the provision of the Framework⁴, one must also consider the viability and suitability of the proposed development. The market in parts of St Helens are challenging and the delivery of high-density development would face significant viability related hurdles which could only be overcome through public sector intervention, and there is limited certainty on such revenue sources in the future. Finally, the Council's latest SHMA⁵ (Table 38) sets out a need for approximately 70% of future market dwellings to comprise 3- and 4-bedroom properties to cater for demand. With this in mind, urban densification is likely to deliver smaller, 1 and 2 bed properties, which would not align with the demand in St Helens.

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

2.12 As set out in Taylor Wimpey's previous representations, they acknowledge that there is no single accepted methodology for undertaking Green Belt Reviews and the general approach set out by the Council is supported albeit some queries and concerns over the assessment conclusions were raised previously. In general, it is considered that the Green Belt Assessment undertaken by St Helens Council to support the selective release of land from the Green Belt is robust.

2.13 Taylor Wimpey has land interests in a number of the authorities surrounding St Helens and has been party to the preparation of their Green Belt Reviews. In general, Taylor Wimpey is of the opinion that a broadly consistent approach has been adopted in Halton and Warrington which are both promoting the release of sites from the Green Belt through their Local Plan supported by a Green Belt Review. Furthermore, Taylor Wimpey has also been party to the Green Belt Review and Local Plan Examinations in Sefton, Knowsley and West Lancashire and a degree of consistency is present in the approach and methodology applied in all Green Belt Review, albeit with subtle differences which are acceptable.

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

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

2.14 Taylor Wimpey is supportive of the principle of St Helens Council identifying safeguarded land to meet development needs beyond the plan period. It is considered that the identification of safeguarded land accords with the provisions of national planning policy⁶ and will provide greater certainty over the Green Belt boundaries beyond the plan period.

2.15 Taylor Wimpey would advocate that a policy mechanism is introduced into the Plan which allows for the release of safeguarded sites to come forward as 'Plan B' sites in the event that the Council's housing land supply position deteriorates and the Council cannot demonstrate a sufficient supply of land. This will ensure flexibility and accounts for the potential non-delivery of committed sites and any other short comings in its housing land supply. That said, TW is of the opinion that the Bold Forest Garden Suburb site could commence delivery of units in advance of the Council's claimed trajectory.

⁴ §67 Framework

⁵ St Helens, SHMA Update January 2019

⁶ §139 The Framework

Issue 4: Compensatory improvement to Green Belt land

11. *Taking into account the Council's initial response, is the Plan clear on how it would intend to deliver compensatory improvements?*

- 2.16 This matter does not appear to be covered directly in the SHLP at present, but it is likely that there will be a requirement on all developments in the future to incorporate the principle of Biodiversity Net Gain within their development thus providing compensatory improvements to land identified to meet development needs. Furthermore, the Council's response to the Preliminary Matters, Issues and Initial Questions (SHBCO01 - PQ47) directly discusses Taylor Wimpey's land interested in St Helens and clearly sets out the expectations for the delivery of compensatory improvements on these sites.
- 2.17 Taylor Wimpey's sites are currently in use for agricultural purposes. When the development comes forward, as well as the measures set out in the Council's response (PQ47), designated open space with greater ecological value will be incorporated in the sites, the development will enhance the existing public rights of way through the site and will achieve Biodiversity Net Gain thus offering compensatory improvements to environmental quality and accessibility.
- 2.18 Taylor Wimpey is generally supportive of the measures proposed by the Council on their draft allocation sites and the requirement for a comprehensive masterplanning approach on the sites provided the proposed compensatory improvements are appropriately considered through the Council's viability appraisal.

12. *On the assumption that the Plan's policies should set out ways that such compensatory improvements would be achieved, what modifications would be necessary?*

- 2.19 Taylor Wimpey is of the opinion that if an alteration is required to the Plan to account for compensatory improvements, this could be achieved through a Main Modification to Policy LPA05.1 (Strategic Housing Sites) by including an additional point under Part 2 of the policy to state:
- 'The compensatory improvement measures to be included across the strategic site as a whole'*
- 2.20 Taylor Wimpey considers that with this addition, the compensatory improvement required to accord with national planning policy can be factored into the comprehensive masterplan for each strategic sites as a whole and all future planning applications on individual parcels of land will need to accords with the masterplan provision and deliver appropriate levels of compensatory improvement.

Issue 5: The spatial distribution

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

- 2.21 Taylor Wimpey is generally supportive of the Council's spatial distribution strategy within the Plan and considers that it is fully justified and in line with national policy. Policy LPA02 seeks to direct new development towards the most sustainable locations and sets out that the re-use of previously developed land will remain a key priority. The release of land from the Green Belt to enable the need for housing and employment has been directed towards the most sustainable locations also which include Taylor Wimpey's interests in land at Gartons Lane (Site Allocation 5HA) and Gorsey Lane (Site Allocation 4HA).

2.22 The Council's justification for the spatial distribution strategy contained within the Plan is set out in Developing the Spatial Strategy Background Paper (October 2020). This explains the evolution of the Council's spatial strategy through the various iterations of the emerging Local Plan and sets out that the Plan was revised to strike the balance towards regeneration and growth. It also explains that housing development will remain focused on the Key Settlements in the authority area which accords with the principles of promoting sustainable development.

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

2.23 The spatial strategy set out in the SHLP seeks to strike a balance between regeneration and growth in St Helens whilst directing future growth towards the most sustainable settlements (St Helens Core Area; Blackbrook and Haydock; Newton le Willows and Earlestown; Rainford, Billinge; Garswood and Rainhill). The Council continues to promote the redevelopment of brownfields sites and is seeking to maximise the development potential of these sites in conjunction with limited selection of sustainable urban extensions on the most sustainable settlements.

2.24 It is considered that by promoting future development in the most sustainable locations with easy access to services and facilities including public transport, the spatial strategy is having regard towards the impacts of climate change and seeking to reduce CO2 emissions.

Issue 6: Site Selection

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

2.25 The SHLP sets out that the sites identified for release from the Green Belt have been selected following a comprehensive Green Belt Review which included an assessment of their physical suitability for development, accessibility by sustainable transport modes and their economic viability for development. Taylor Wimpey is supportive of the Council's site selection process for residential development and considers that it was robust positive and justified. Furthermore, Taylor Wimpey's sites at Gartons Lane and Gorsey Lane are highly accessible by sustainable modes of transport, adequate infrastructure is already in place or can be delivered to facilitate their delivery and both sites are deliverable and in the control of a national housebuilder. It is also envisaged that both sites can be brought forward in the early stages of the Plan to meet identified housing needs.

Issue 7: Policies LPA 03 and LPA01

16. Is policy LPA03 consistent with national policy and effective?

2.26 Taylor Wimpey is broadly supportive of the principle of Policy LPA03 and the need for new development to contribute towards the sustainable growth of the Borough. However, although Taylor Wimpey acknowledges the importance of reducing its carbon footprint and adapting to the effects of climate change, Taylor Wimpey note that elements of Part 8 (a-f) would have an effect on development viability and it is imperative that these are fully factored into the Council's viability assessment, a matter we will consider in more detail in our submission to Matter 10 & 11.