

CPRE COMMENTS ON

Session 8 – 09.30 Thursday 17 June 2021

Matter 6

Employment Land Supply, Employment Policies and Town Centres

This matter considers employment land supply, employment policies and town centres.

Policies to be covered by Matter 6: LPA04, LPA04.1, LPB01, LPB02

Main Evidence Base

SD022 – Employment Land Need and Supply Background Paper

EMP004 – Retail and Leisure Study

EMP011 – St Helens Town Centre Strategy

LOC014 – Local Economy SPD

SHBC001 & SHBC005 – Council response to Inspector’s preliminary questions

Issue 1: Employment land supply

As of 31 March 2020, the supply of developable employment land was 4.04ha (Table 4.2 of SD022). This takes account of the fact that Sites 2EA, 3EA and 10EA have all now been completed. Also, Site 9EA has not been recently counted in the supply of employment sites as the extant planning permission on the site was granted in 1992 and although development was lawfully commenced it is considered that the deliverability of the extant permission is uncertain.

The Council has agreed to provide a further update to Table 4.4: Residual Employment Land Requirement – 2018 - 2035. (p34 of the submitted Plan) via a MM to reflect the situation as of 31 March 2021 and potentially to reflect an extended Plan period up to 2037.

1. Will the up to date employment land supply position and the components of the employment land supply that will meet the employment land requirement be clearly shown in the Plan (base date of 31 March 2021)?

CPRE supports the local plan showing justified employment sites in sustainable locations to steer future development in a clear and logical way.

Issue 2: Employment Policies

The Council have suggested an additional criterion to Policy LPA04 1 (and the reasoned justification) relating to the Covid-19 pandemic. The relevant Council references are AM014 and AM092. These are both considered to be an MM.

2. Would the modification referred to above be justified and necessary?

CPRE wishes to understand better the meaning of “e) support businesses and organisations in the economic recovery and renewal from the COVID-19 pandemic”. Covid business deals gave rise to high cost to low benefit outcomes. St Helens local plan should not invite inconsistency in decision making down the line.

CPRE highlights that the hospitality and retail sectors were impacted severely, and still are. Ensuring the food supply chain from local farms to boost the market is important. Is this to be supported by the modification?

A key finding of Covid was the need for accessible green space. Covid response in the Local Plan ought to be to better value local greenspace and afford any loss a higher level of negative weight in the planning balance of local decisions.

Section 5 of Policy LPA04 seeks protection of existing employment sites unless other uses can be justified. However, paragraph 121 of the Framework advocates a positive approach to applications for alternative uses of previously developed land.

3. Is the Council satisfied that Policy LPA04 is consistent with national policy in relation to the above provisions?

CPRE retains its case that the employment land figure is too high with adverse consequence for other aspects of national policy concerning including, but not limited to NPPF Section 8 Promoting healthy and safe communities, 11 Effective Use of Land, Section 12 achieving well designed places, Section 13 Green Belt and Section 15 Conserving and enhancing the natural environment.

Section 4 b) of Policy LPA04 requires an allocated site (for the purposes of the policy) to be ‘offered for employment use on the open market at a reasonable price in a manner and for a period agreed with the Council’.

4. Is Criterion 4 b) effective (sufficiently clear and precise to applicants and decision makers), particularly as to how a ‘reasonable price’ and the manner and period of marketing required would be defined?

The Council have suggested an MM to update the reasoned justification to Policy LPA04 to include reference to a minimum marketing period of 18 months for allocated employment sites.

5. Would the above MM, including an 18-month period for marketing, ensure the policy is justified and effective?

Yes

The change of use of other sites and buildings that are or were last in employment uses is dealt with under Policy LPA04 Section 5. Part a) refers to the Local Economy SPD which was published in 2013.

Paragraphs 6.10 to 6.17 of the Local Economy SPD sets out how such applications would be dealt with national policy?

The SPD also references a minimum marketing period of 12 months as being required. This differs to the 18-month period for allocated sites.

7. Is the above difference in timescales justified?

Yes. Due to covid and Brexit it may take longer to market sites.

8. Bearing in mind that SPDs do not form part of the development plan and should be used to add further detail to the policies in the plan, is it sufficiently clear what the requirements of this part of the policy are from Policy LPA04 alone and is the policy effective in this regard?

SPD's generally help to articulate local plan policies and are a material consideration.

Issue 3: Town centres

Policy LPC04 sets out the network and hierarchy of centres in the area. The relevant evidence base document supporting how they have been defined is the Retail and Leisure Study (EMP004).

9. Is the retail hierarchy of centres (set out in Policy LPC04 Section 1 of the Plan) logical and justified by the evidence?

10. Taking into account the pandemic has the Council considered whether Policy LPC04 and the extent of defined centres will be effective over the Plan period, particularly having regard to the possible need for town centres to be more adaptable and flexible in terms of uses?

CPRE thinks a suitable hierarchy is useful to aid urban concentration.

Paragraph 4.6.16 sets out the aim of the Plan in supporting existing centres. New retail and town centre uses will be focused towards existing centres appropriate to their type and scale. The preferred location for new comparison retail and intensive town centre leisure development will be St. Helens Town Centre which has seen its comparison goods market share weaken in recent years. Policy LPB01 provides more detail of the approach that will be taken in St. Helens Town Centre and Central Spatial Area, with a focus on helping to create a high-quality built environment that will help support the delivery and implementation of future regeneration and development. A Town Centre Strategy (2017) sets out a vision for the future of the Town Centre and details initiatives to deliver this. This includes improving the offer of St. Helens Town Centre including through the provision of new retail and leisure floorspace, along with steps to encourage the reuse of vacant floorspace. The Plan considers that these measures will be sufficient to address the qualitative and quantitative needs identified.

Policy LPB02 provides more detail on the approach that will be taken in Earlestown Town Centre, described as the second Town Centre in the Borough and paragraph 5.6.8 sets out the intention to bring forward a dedicated Town Centre strategy in the form of an SPD.

11. Is the retail strategy the most appropriate strategy for the area and is it justified by the evidence?

The impact of covid on traditional retail needs to be properly considered. There was a trend in online sales and this was exacerbated during Covid. Some trade will return to in store formats and some will not. Obsolete retail space should be repurposed to ensure centres remain vibrant.

Paragraph 5.3.3 of the Plan sets out a requirement for additional comparison goods floorspace across the Borough as having been identified from 2023 onwards. This will correspond to an

approximate need for between 3,000 m² and 6,200m² of new floorspace by 2028 rising to between 9,200m² and 21,200m² by 2033. The Plan proposes to meet this need (at paragraph 5.3.4) by pursuing a 'town centre first' principle and by accommodating as much of this additional floorspace within St. Helens Town Centre as possible. This will be achieved by prioritising the re-occupation of vacant units and seeking to locate future leisure-based development in the town centre (paragraph 5.3.5).

12. Does Policy LPB01 clearly set out how future retail needs will be met during the Plan period?

LPB01 correctly prioritises pedestrians, cyclists and public transport. Car dominance needs to be reduced due to climate emergency action required.

13. Is the policy justified and consistent with paragraph 85 d) of the Framework which states that planning policies should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead?

No comment at this stage.

Policy LPB01 refers to the 'St Helens Town Centre and Central Spatial Area'. The Council has suggested a Modification to the reasoned justification for Policy LPB01 to signpost that the Central Spatial Area is shown on the policies map and also that a plan showing the Central Spatial Area boundary could be inserted into Appendix 11 (MM).

14. *Would these suggested modifications ensure that the policy wording is clear as to what is meant by the Central Spatial area and how it is defined for the purposes of the policy?*

More housing may be appropriate for delivery in town centres to help with 24 hour viability and liveability goals.

Policy LPB01 refers to an 'area of opportunity'. The policy states that this area has been identified for future development. The Council has stated (SHBC001) that the 'Area of Opportunity' was identified through the St.Helens Consultation Draft Town Centre Strategy (2017) (EMP011). The area defined indicatively on the Policies Map reflects one part of the 'Growth Quarter' (located to the south of the Primary Shopping Area) identified in the Strategy. The Growth Quarter has been identified as an arc of opportunity to enhance the vitality and viability of St Helens town centre and its role as a sub-regional shopping centre.

15. *Is it sufficiently clear from the wording of Policy LPB01 how the area of opportunity is defined, what its purpose is and when development is expected to take place in this area?*

No comment at this stage.

16. *How will the policies in the Plan deal with development proposals that come forward?*

No comment at this stage.

Policy LB01 and supporting text (paragraph 5.3.9) refers to Primary and Secondary frontages and that they have been identified in line with the Framework. The Framework no longer specifically

refers to Primary and Secondary Frontages, albeit that PPG does. National policy now only refers to Primary Shopping Areas.

The Council have acknowledged the shift away from 'Primary and Secondary Frontages' to a 'Primary shopping area' as outlined in Paragraph 85a) of the Framework and supporting Town Centre definition.

The Council now consider that it is not necessary to identify Primary and Secondary Frontages. The Council have suggested modifications to address this (MM) and these are set out in a table on page 50 of SHBC001.

17. Will the Modifications suggested ensure that the approach to Town Centre definition in the Plan is effective and consistent with national policy?

No comment at this stage.

In requiring an impact assessment, paragraph 89 of the Framework sets a default threshold of 2,500 square metres where there is no locally set threshold. Policy LPC04 (part 6) states that the locally set threshold for retail development will be: 300m² within 800m of the boundary of Earlestown PSA or of a District Centre; 200m² within 800m of the boundary of a Local Centre; and 500m² in all other cases. Leisure development would also have the same locally set thresholds applied. The policy goes on to state (Part 8) that where more than one impact threshold applies, the lower impact threshold will take precedent.

18. Is this locally set threshold appropriate and justified by the evidence?

No comment at this stage.

Paragraph 6.12.11 states that where an impact assessment is required the applicant should agree the scope with the Council and that the Council will take account of PPG when considering such assessments.

19. Is the above wording effective and is it clear that the Council will in effect agree the scope, scale and level of required information having regard to national policy?

No comment at this stage.

In SHBC001, the Council have stated that the changes in the Use Class Order will have no significant impacts on the effectiveness of the Plan but that there will need to be some modifications made to those policies affected by the change in use classes (the Council's suggested modifications are listed in a table within SHBC001 from pages 44-48).

20. Is the change in the UCO likely to have any significant impacts on the effectiveness of the Plan and could any impacts be addressed by modifications to the affected policies?

No comment at this stage.