



ST HELENS BOROUGH LOCAL PLAN 2020-2035 EXAMINATION

MATTER 11 – MONITORING AND IMPLEMENTATION

ON BEHALF OF REDROW HOMES NORTH WEST

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Pegasus Group

Queens House | Queen Street | Manchester | M2 5HT

T 0161 393 3399 | **W** www.pegasusgroup.co.uk

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1. INTRODUCTION

- 1.1 Pegasus Group has been instructed on behalf of their client, Redrow Homes North West, to prepare Hearing Statements to the St Helens Local Plan Examination (EiP) in support of their land interests in the Borough. This comprises land to the south of Burrows Lane, Eccleston, which is currently an omission site (i.e. is not allocated for development) in the emerging St Helens Local Plan.
- 1.2 This Statement deals with Hearing **Session 11 Matter 11 'Monitoring and Implementation'**.

2. ISSUE 6: MONITORING AND IMPLEMENTATION

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

- 2.1 The Council has set out their proposed modifications to Appendix 4 in document reference **SHBC010**. The monitoring table clearly sets out trigger points and potential actions for contingency, however we do have some concerns about the contents of the monitoring table and suggestions as to how these can be improved, as discussed under question 28.

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

- 2.2 No comments on proposed indicators.

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

- 2.3 No, it is our view that these trigger points are insufficiently clear and will therefore not be effective, for the reasons set out below. As per paragraph 33 of the NPPF, policies in Local Plans should be reviewed to assess whether they need updating at least once every five years, and policies may require earlier review if local housing need is expected to change significantly in the near future.
- 2.4 Meeting the Borough's development requirements are clearly fundamental when assessing the effectiveness of the Local Plan. Under Policy LPA05 (Meeting St Helens' Housing Needs), a trigger for action is stated as having fewer than 5 years supply (plus the required buffer) of housing land. Whilst this is acceptable, the potential action of contingency states the following:
- "Consider early review of the Local Plan if there is long-term underperformance against the 5-year supply."*
- 2.5 It is unclear what long-term underperformance is defined/constituted as and it is considered that this needs to be made much clearer. Whilst it is accepted that there can be short-term fluctuations in housing land supply that can be addressed without a need for a full Local Plan Review, the trigger point needs to be much clearer in order for the Plan to be fully effective and to provide certainty that development requirements will be met.
- 2.6 This is particularly relevant in St Helens, as there is a strong likelihood that local housing need will increase within the next 5 years through the Liverpool City Region SDS process, as there is a clear indication that Liverpool will struggle to meet its own needs going forward, given the 35% uplift for cities in the latest standard method calculations, which will then need to be met by the 5 other LCR authorities, with St Helens confirmed as being well placed to meet regional needs for larger family housing.
- 2.7 Accordingly, in line with NPPF paragraph 33, this trigger point and contingency for an early review are important, and need to be made clearer than they are currently drafted. For example, the

action point could be a need to consider a Local Plan Review if housing land supply falls below the 5-year requirement for two consecutive years, or below 4 years of housing land supply.

- 2.8 A similar comment applies to Policy LPA05.1 (Strategic Housing Sites), with the trigger for action stated as:

"number of dwellings completed on strategic site falls below 75% of target"

- 2.9 We are supportive of this trigger, but this does not translate to an effective action point. A potential action of contingency is stated as:

"Consider early review of the Local Plan if there is significant under-delivery on the strategic sites"

- 2.10 Significant under-delivery is not clearly defined or measured. Again, to provide certainty that housing needs will be met, this action point needs to be re-looked at. We recommend the following amended wording (our suggested additions underlined):

"Consider early review of the Local Plan if there is significant under-delivery on the strategic sites (below 75% of target) and a failure to deliver a five-year housing land supply"

- 2.11 In addition to a trigger for an early review if housing land supply were to drop below 5 years for two consecutive years (or below 4 years in a single year) it would also be worthwhile including a trigger relating to the Housing Delivery Test, given this is now a standardised approach for measuring housing supply. This could say that a review would be required if the HDT score fell below 75% (i.e. when the presumption in favour of sustainable development is engaged in line with paragraph 11/ footnote 7 of the NPPF).

- 2.12 We are supportive of the trigger and action points in relation to LPA06 (Safeguarded Land). The trigger for action is stated as failure to deliver sufficient housing land and the action is to consider early review of the Local Plan. This is an effective monitoring mechanism, as if housing land supply is to fall short, safeguarded land can only be released through a Local Plan Review. At this point there would also be a need to consider other candidate sites for housing allocation, as well as the replenishment of safeguarded land sites.

Question 29 - Is the Plan clear as to which SPDs will be updated and prepared to provide guidance on the implementation of the Plan?

- 2.13 No, as outlined in our Matter 4, Session 4 Statement, the Local Plan Submission Version and Schedule of Modifications (**SHBC010**) fail to refer to an SPD for the Bold Forest Suburb allocation (Site 4HA). This is despite this being consistently referred to in the Bold Forest Position Statement (**SD027**). The evidence base documents must be aligned, and reference to the Bold Forest SPD must be included with the Local Plan should this allocation proceed in its currently proposed format.