



St. Helens Council

ST. HELENS BOROUGH LOCAL PLAN 2020- 2035

Housing Need and Supply Background Paper

October 2020

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1. Introduction

- 1.1 This Background Paper is one of several that have been prepared by the Council. It will provide evidence for the forthcoming Examination in Public of the St. Helens Borough Local Plan 2020-2035 (the SHBLP).
- 1.2 The purpose of this Paper on housing is twofold. Firstly, it is to set out the background and approach taken to the housing policies in the SHBLP; and secondly to provide an update on the Council's housing land supply position.
- 1.3 It is not the purpose of this Paper to repeat all the evidence that the Council has relied upon when preparing the SHBLP. This evidence has been separately published and is available on the Council's website. However, where appropriate this document refers to the source of evidence and provides a brief summary or explanation of how the evidence has been considered. Similarly, options which are referred to in this Paper are explained further in Developing the Spatial Strategy Background Paper (SD026), and the Local Plan Sustainability Appraisal reports.
- 1.4 This Paper (specifically Appendices 1 and 3) also seeks to provide an update to the housing supply data and site assessment information contained in the Council's last St. Helens Strategic Housing Land Availability Assessment (SHLAA) which was published in 2017. This is to ensure that the SHBLP is based on robust and up to date evidence.
- 1.5 This Paper briefly summarises:
 - the policy context relevant to housing need and supply (see Section 2);
 - how the Borough's housing needs have been established (see Section 3);
 - the SHBLP housing requirement (see Section 3); and
 - how the SHBLP housing requirement will be delivered (see Section 4).
- 1.6 This Paper should be read in conjunction with other evidence base documents. These include:
 - St. Helens SHLAA Update (2017);
 - Mid-Mersey Strategic Housing Market Assessment (2016);
 - St. Helens Strategic Housing Market Assessment Update (2019); and
 - Merseyside and West Lancashire Gypsy and Traveller Accommodation Assessment (2015).

2. Policy Context

National Planning Policy

- 2.1 The National Planning Policy Framework (NPPF) 2019 sets out the Government's planning policies for England and how these are expected to be applied. Paragraph 10 of the NPPF states that a "*presumption in favour of sustainable development*" is at the heart of the framework.
- 2.2 As part of this, in relation to plan making, it sets out that this means that "*strategic policies should, as a minimum, provide for objectively assessed needs of housing*" (paragraph 11), unless there is strong reason for restricting development, including the application of policies to protect areas or assets of particular importance or any adverse impacts would significantly and demonstrably outweigh the benefits.
- 2.3 Chapter 5 of the NPPF (2019) relates to delivering a sufficient supply of homes with paragraph 59 providing an important context to the policy for housing delivery as follows:
- "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*
- 2.4 Paragraph 60 goes on to set out that "*to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance*", which is addressed in section 3 of this Paper. However, in exceptional circumstances, an alternative approach could be justified.
- 2.5 Specifically, the NPPF (paragraph 61) identifies that the size, type and tenure of housing need for different groups in the community, should be assessed and reflected in planning policies. This is identified as including, but not limited to:
- those who require affordable housing;
 - families with children;
 - older people;
 - students;
 - people with disability;
 - service families;
 - travellers;
 - people who rent their homes; and
 - people wishing to commission or build their own homes.
- 2.6 The NPPF (Paragraph 65) requires that:

“strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.”

Planning Practice Guidance

- 2.7 The Planning Practice Guidance (PPG) provides more detailed guidance on the methodology behind objectively assessing and evidencing development needs for housing (both market and affordable).
- 2.8 The guidance sets out that an assessment of need should be realistic and based on future scenarios that could reasonably be expected to occur. It outlines that estimating future need is not an exact science but that the starting point should be the latest household and population projections. However, it goes on to say that upward adjustments should be made where other relevant factors, such as market signals, point to the supply side having been constrained, or to improve affordability.
- 2.9 In relation to local authorities who do not use the standard method, the PPG suggests that where a higher need is identified than the standard method and where it adequately reflects current and future demographic trends and market signals *“the approach can be considered sound as it will have exceeded the minimum starting point”* (Paragraph 15).

Self-build and Custom Housebuilding Act 2015

- 2.10 As of April 2015, local authorities are required to establish and adequately maintain a register of people seeking to acquire land to build or commission their own home. The Act also required local authorities to grant development permission in respect of enough serviced plots of land to meet the demand for this type of property in their area.

Sub Regional Policy Influence

Mid Mersey

- 2.11 St. Helens, Halton and Warrington are in the Mid Mersey (or "Eastern") Housing Market Area (HMA), as originally identified by the 2007 Liverpool City Region Housing Strategy. Between July 2008 and March 2011, the three authorities were part of the Mid-Mersey Growth Point which aimed to increase the delivery of housing in the sub-region.
- 2.12 One of the Growth Point's key objectives was to increase the delivery of housing in the sub-region from the RSS requirement of 13,500 to at least 15,660 by 2016/17. In St. Helens this translated into a 20% 'uplift', equating to an additional 114 dwellings per annum above the RSS target of 570 dwellings per annum between 2008/09 and 2016/17 (a total uplift of 1,026 dwellings).

- 2.13 However, due to the ending of Central Government funding, the Mid Mersey Growth Point ceased to exist at the end of March 2011. In order to take account of this, the additional 20% Growth Point uplift was removed.
- 2.14 The Council, in partnership with Halton and Warrington Councils, commissioned GL Hearn to prepare a Mid-Mersey Strategic Housing Market Assessment (SHMA) which was published in January 2016. The SHMA identifies the Objectively Assessed Needs (OAN) for housing as well as considering the need for different types of housing and the housing needs of different groups within the community. The 2016 SHMA concluded that the OAN for housing across the HMA is 1,756 dwellings per annum from 2014 to 2037, split across the HMA as follows:
- St Helens - 451 dwellings per annum;
 - Halton - 466 dwellings per annum; and
 - Warrington - 839 dwellings per annum.

Liverpool City Region

- 2.15 The Liverpool City Region Growth Strategy (adopted 2016), which includes St. Helens along with Halton, Knowsley, Sefton, Wirral and Liverpool sets out the vision for the region to *“build on our core strengths and capacity for innovation to create a truly global and competitive City Region at the heart of the Northern Powerhouse.”* To achieve this the main priorities of the Strategy are:
- to start, attract and develop more businesses;
 - to nurture and grow our talent base;
 - to enhance and protect our distinctive quality of place; and
 - to create more sustainable employment and high value jobs.
- 2.16 A Strategic Housing and Employment Land Market Assessment (SHELMA) assessing the housing and employment needs for the Liverpool City Region was produced in 2018 using both a baseline scenario and a growth scenario.
- 2.17 These two scenarios produced a large range in St. Helens with the baseline showing a forecast growth of 3,200 jobs in the Borough over the period 2012-37 while the growth scenario forecast a growth of 17,100 jobs.
- 2.18 In housing terms, the baseline economic scenario (397 dwellings per annum) could be supported by the demographic growth (416 dwellings per annum) however the growth scenario requires considerably more housing (855 dwellings per annum).
- 2.19 As the SHELMA explains the Growth Scenario reflects jobs growth which could result from development projects and policies which are expected to be

implemented over the study period. It also adds that for some local authorities it may be appropriate to plan for this additional growth.

- 2.20 However, as the SHELMA stresses this is an above trend level of growth and in St. Helens it takes account of site options or potential policy interventions, which haven't been allocated and are unlikely to be delivered. In St. Helens the SHELMA took account of all of the proposed employment land allocations in the Local Plan Preferred Options Stage (2016), which were reduced at the Local Plan Submission Draft stage.

LCR Spatial Development Strategy

- 2.21 The LCR Combined Authority is preparing a Spatial Development Strategy (SDS) covering Halton, Knowsley, Liverpool, Sefton, St. Helens and Wirral. The LCR Statement of Common Ground (SoCG) (October 2019) will inform the policy matters to be covered by the first SDS. In the LCR Statement of Common Ground (SoCG) (October 2019) the LCR authorities agree that future Local Plan housing requirements will either equal or exceed the identified Local Housing Need, with the SHELMA informing an alternative approach for any higher figure for some authorities. In the LCR SoCG the authorities agree that there is no unmet housing need to be redistributed among or beyond the seven local authorities during current local plan periods.

Duty to Cooperate

- 2.22 The Duty to Cooperate legislation is set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Section 110 of the Localism Act 2011). St. Helens Council has implemented the Duty to Cooperate requirement under the Localism Act 2011 and the National Planning Policy Framework (NPPF) by working with neighbouring authorities on cross boundary issues, including housing growth see St Helens Local Plan 2020 - 2035 Duty to Cooperate Statement (SD009) for further information.

Local Evidence and Policy Influence

St. Helens Employment Land Needs Study (2015) and Addendum (2017) Amended (2019)

- 2.23 The Employment Land Needs Study (ELNS) was prepared by BE Group to examine supply and need up to 2037. The study was undertaken in parallel with the Mid-Mersey SHMA and built upon the previous employment land reviews for St. Helens.
- 2.24 The 2015 Study sets out that St. Helens' employment role in the broader region is that it has a net outflow of commuters, particularly to Warrington, Knowsley and Liverpool. It was considered that there are opportunities for St. Helens to improve the commuting imbalance and broaden the breadth of employment opportunities for local residents.

- 2.25 The report also recognises that there are opportunities for St. Helens to take advantage of demand from the logistics sector. However, this would be dependent on new built stock on large flat sites with excellent motorway access, rather than current vacant premises. Such large-scale logistics operations are likely to have a propensity for greenfield locations.
- 2.26 The need for employment land in St. Helens to 2037 was examined and projected to guide planning in the Borough. It was projected that St. Helens would have a baseline requirement for employment land between 147- 174 ha. This was based on a continuation of recent trends.
- 2.27 The SuperPort and Parkside projects were considered to have the potential to increase demand for employment land in St. Helens, particularly for B8 and B2 uses. It was projected that St. Helens would have an employment land requirement of between 177-214 ha between 2012 and 2037 once these developments are delivered.
- 2.28 The addendum report updated the need for employment land to 190-239 ha taking account of a wider range of strategic sites. The report then translates potential employment capacity on the key employment sites in the Borough.
- 2.29 In total the sites were expected to accommodate up to 9,300 new jobs across 13 sites. The Omega South site also has the potential to meet some of Warrington's need and if so, the net growth would be 8,600 jobs.
- 2.30 The ELNS addendum also considered the delivery timeframe for these sectors and considered the scenarios 2 and 3 as most realistic. Scenario 2 was subsequently taken forward as the scenario to inform housing need. This scenario saw the prioritisation of sites to allow for limits on market demand and construction capacity, which results in a smoother take-up of sites over the plan period. Scenario 2 resulted in 7,380 additional jobs in the plan period to 2033.
- 2.31 The ELNS addendum then examines the labour force implications of this level of growth taking into account economic activity rates, unemployment and commuting. As a result, this calculated a net employment growth of 2,959 jobs in the Borough taken up by Borough residents by 2033.
- 2.32 The ELNS addendum also examined alternatives to this growth with some sites being excluded from consideration. One option was to remove Local Plan Preferred Option sites EA1 (Omega South) and EA4 (Land North East of Junction 23 M6, Haydock) from further consideration. Removing these sites reduced the additional local workforce growth required to 2,253 and this was taken forward in the Local Plan Submission Draft. This would be met by increased migration to the Borough.

- 2.33 While this approach produces a different result from the SHELMA it takes into account more local assumptions on development sites, their potential and timeframe for delivery. The report also uses more localised assumptions on commuting drawn from survey data (see Section 3 for further information).

St. Helens Local Plan Core Strategy Housing Requirement (2012)

- 2.34 The existing Local Plan Core Strategy has a housing requirement of 570 dwellings per annum, this requirement was originally set out in the North West Regional Spatial Strategy (RSS) (2008). This requirement was 170 dwellings higher per annum than the previous RSS (2003) housing requirement of 400 dwellings per annum.
- 2.35 The methodology that was used to help derive the RSS housing requirements was based on the following three key elements:
- The use of raw data from DCLG 2003 household projections (which were informed by the 2003 based ONS population projections);
 - Delivery and supply issues in individual boroughs; and
 - The spatial planning policies and priorities for the region and sub-regions (based on the aspiration for significant economic growth across the region).
- 2.36 The annual average household growth from the DCLG 2003 household projections for St. Helens was 260 per year (2003-2026); the final RSS requirement of 570 new dwellings per annum for St. Helens was 119% higher than DCLG household projections reflecting the economic growth ambitions of the Council and wider region. The population projections that informed the DCLG 2002 household projections were the 2002 based ONS Sub-National Population Projections, which predicted an annual rate of population growth of 367 persons per year in St. Helens between 2003-2021.
- 2.37 The Core Strategy housing requirement was 170 dwellings higher per annum than the 2008 based DCLG Household Projections (2010) of 400 dwellings per annum and has a base date of 2003, as 2003 was the base date used in the research forecasts in the RSS evidence base.

3. Establishing the Local Plan Housing Need and Requirement

- 3.1 There are two stages to identifying the housing requirement for the Local Plan. As set out in Section 2, at the first stage, the Council is required to undertake a Local Assessment of Housing Need (LHN) for new homes covering market and affordable housing using the standard method. This will identify a minimum annual housing need figure.
- 3.2 The second stage involves translating this into a requirement for the number of homes to be provided. At this point, policy objectives can be considered. This includes the consideration of the capacity of the Borough's supply of deliverable and sustainable land, any cross-boundary un-met housing need, and the Council's wider policy objectives.
- 3.3 There is an expectation that local authorities can increase the standardised methodology figure to provide more homes, with an expectation that any such increase would be deemed to be a sound approach, unless there are compelling reasons to indicate otherwise.

Determining St. Helens' Housing Need

- 3.4 The St. Helens SHMA prepared by G L Hearn was published in January 2019 and provides an update to the Mid Mersey SHMA that was produced in January 2016.
- 3.5 The report uses an OAN standard method, as well as demographic-led housing need assessment using the latest population projections and economic forecasts. These were linked to the Employment Land Needs Study (2019).
- 3.6 A Housing Market Area (HMA) is defined in the PPG as a *“geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work”*. The Mid Mersey SHMA (2016) defined the HMA area in some detail drawing on census data which has not yet been updated. The analysis through triangulation of sources strongly supports a Mid-Mersey housing market area based on Warrington, St. Helens and Halton Boroughs.

Household Projections

- 3.7 The first stage of the standard methodology is to examine household projections. As per the guidance these are not the latest projections but the 2014-based projections. This is in order to ensure that the country aims to deliver 300,000 new homes per year.

- 3.8 The 2014-based projections show a growth of 411¹ households per annum over the 2020-30 period. This is the equivalent of 4.9% growth.

Uplifts

- 3.9 The PPG sets out that consideration should be given as to what level of uplift is required to respond to market signals. The standard methodology applies an adjustment to the housing need derived from the household projections by 0.25% for every percentage point the affordability ratio is above 4.
- 3.10 In St. Helens the workplace based affordability ratio was 4.88 in 2019². This meant that median house prices are 4.88 times the median earnings of those working in St. Helens. As a result, the uplift in St. Helens is 5.5%³.
- 3.11 Applying this to the 2014 based household projections results in a growth of 434 dwellings per annum⁴ for the period 2020 to 2030 using the standard method. The minimum local housing need figure for St. Helens (as of March 2020) is therefore **434 dwellings per annum**⁵.

Aligning Economic Growth and Housing Need

- 3.12 The PPG (Paragraph 10) sets out that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Circumstances where this may be appropriate include but are not limited to, areas with growth strategies; where there is strategic infrastructure improvements or where an authority is agreeing to take on unmet need from neighbouring authorities.
- 3.13 Where local authorities choose an alternative method, which identifies a need higher than using the standard method, the approach can be considered sound as it will have exceeded the minimum starting point.
- 3.14 Through the ELNS and SHMA the Council have sought to consider the locally specific issues likely to affect job growth and the subsequent housing need associated with this growth, with the starting point being that the Council must as a minimum meet the standard method figure (currently **434 dwellings per annum**).
- 3.15 The SHMA considered whether the economic growth proposed in the Local Plan could result in a need for additional housing above the standard method. The SHMA examined the housing need from the growth set out in the ELNS Addendum Report (January 2019) (7,380 jobs) alongside other potential sources of job growth. This was necessary as the ELNS only examined B-

¹ Please note that this figure differs to the St. Helens SHMA Update 2019 figure of 349 per annum. As the SHMA shows projected growth over the ten year period from 2018 to 2028, while this Paper shows projected growth over the 2020-2030 as required by the Government guidance.

² Source: ONS House price to workplace-based earnings ratio, Table 5c Ratio of median house price to median gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2019 (Published March 2020).

³ Please note that this uplift differs to the uplift applied in the St. Helens SHMA Update 2019 due to the use of more up to date affordability data.

⁴ Please note that this figure differs to the St. Helens SHMA Update 2019 standard method calculation as it uses the most up to date data as required by Government guidance.

⁵ Appendix 4 sets out the Local Housing Need Standard Method process.

class growth at the proposed employment allocations and not growth on non-B-class sites such as retail or healthcare etc..

- 3.16 For the additional non-B class jobs GL Hearn used the OE projections set out within the SHELMA disaggregated by different use classes. G L Hearn also made a further adjustment to account for multipliers from the B-class jobs (4,587 jobs). This in effect created a composite forecast which set out a jobs growth of 11,967.
- 3.17 A series of steps were then taken to translate this into a population growth and housing need. The first of which was commuting patterns, for B-class jobs this used the assumptions within the ELNS which is set out below
- 3.18 Approximately 60 percent of workers in St. Helens also reside within the Borough. This shows quite a high level of retention of its local workforce. However, it also means that some 40 percent of existing workers are commuting in from other areas to fill St. Helens' jobs.
- 3.19 Adopting the 40 percent level of in-commuting for the additional jobs on the employment sites, suggests that some 5,670 of these jobs would be filled by those not living in St. Helens. Accounting for displacement of jobs, the employment sites would result in a net growth of about 3,700 jobs filled by in-commuters.
- 3.20 However, not all commuting is uniform within St. Helens. Facilities that have specialised skills requirements or are high profile employers tend to draw a workforce from a wider geography.
- 3.21 Therefore, to assess potential in-commuting patterns on the employment sites, BE Group considered the following evidence:
- The 2011 Census commuting patterns for St. Helens as a whole reveal that for the St. Helens workforce, 59.6 percent reside in St. Helens, 10.6 percent reside in Wigan, 4.7 percent reside in Knowsley and 4.6 percent in Warrington;
 - Survey work conducted by BE Group on behalf of St. Helens Council of Haydock Industrial Estate businesses found that some 42 percent of workers were from St. Helens, 22 percent from Wigan and 15 percent from Warrington (from an average of business estimates of their worker mix); and
 - Postcode origin of workers data from three existing businesses in Omega Warrington reveal that some 40 percent of workers reside in Warrington, 12 percent reside in St. Helens, 8 percent in Wigan and 40 percent elsewhere.
- 3.22 The modelling for the ELNS and SHMA assume that commuting patterns keep to current characteristics. The forecasts are based on a mix of assumed

commuting patterns as set out above, depending on where the employment site is located. The job growth figure utilised for B-class jobs assumes that those current commuting patterns outlined above are maintained.

- 3.23 For non-B class jobs G L Hearn have assumed a stable commuting pattern from 2011 i.e. G L Hearn assume net out-commuting. In total, G L Hearn assume that 8,500 of the additional jobs (71%) will be taken up by St. Helens residents.
- 3.24 G L Hearn also take into account the number of people with more than one job. This reduces the growth in resident labour force to 8,272 jobs. No further adjustment was made to reduce unemployment as this was considered relatively low already.
- 3.25 To convert the above labour-supply changes into a population projection, migration assumptions within the modelling have been changed so that across the local authority the increase in the economically active population matches the increase in the resident workforce required.
- 3.26 In relation to economic activity and how this might change in the future, the assumptions used in the SHELMA have been used. Essentially this assumes that the economic activity rate increases above the baseline position (as set out in the SHELMA) and rises to half of the difference between the current rate and the national average rate by 2037 (a rise of 75.3% to 76.5%). The date of 2037 for the forecast period is used to be consistent with the SHELMA and it should therefore be noted that the full improvement assumed in the analysis has not taken place by the end of the projection period used in the SHMA Update (2016-33).
- 3.27 The core economic scenario (Scenario 2 Option 3 from the ELNS), which drives the housing need, was calculated as **486 dwellings per annum** over the 2016-33 period. This used household formation rates from the 2014-based projections. This level of housing need is higher than the 434 dwellings per annum scenario resulting from the standard method.

Dealing with any Shortfall in Housing Delivery

- 3.28 The standard method takes into account historic shortfall as part of the calculation. Paragraph 2 of the Housing Need section of the Planning Practice Guidance states that *“The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.”*
- 3.29 While the standard method is not being used, the higher number derived from economic led need would also by extension address any historic backlog.

Setting the Local Plan Housing Requirement

- 3.30 The NPPF is clear that LPAs should seek to meet their LHN in full unless there is a lack of physical capacity or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Where this is the case, then an LPA should work with neighbouring authorities to assess the role they could play in accommodating some of the unmet need.
- 3.31 In setting the housing requirement for the Local Plan, therefore, it is necessary to consider if the LHN figure can be met in terms of any constraints to delivery. Through the development of the Local Plan the Council has identified that there are no fundamental constraints to delivery in terms of land availability (once Green Belt sites have been released), viability, environmental capacity and infrastructure capacity. There is, therefore, considered to be no justification for setting a Local Plan housing requirement lower than the LHN.
- 3.32 As set out above the SHMA assessed different scenarios to identify the level of housing likely to be required to support the employment sites proposed to be allocated within the Plan. Having regard to this evidence, the Council consider Option 3 Scenario 2, which results in an annual housing need of 486 dwellings to be the most appropriate basis for the Local Plan housing requirement, as this reflects the final proposed allocation of employment sites. Local Plan Policy LPA05 'Meeting St. Helens Housing Needs' therefore identifies a minimum average housing need figure of 486 net dwelling completions per year (between 2016 and 2035). This equates to a total of 9,234 dwellings within this period.
- 3.33 The Council's approach has been to provide for the levels of growth in both housing and employment that are realistic, deliverable and therefore achievable within the Plan period. When setting the Local Plan housing requirement, the Council have sought to provide a balance between ensuring enough new housing is provided to meet the Borough's housing need in full, including supporting the employment growth proposed in the Plan and protecting the Green Belt.
- 3.34 It is considered that the 486 dwellings per year requirement represents a sound requirement which addresses housing needs in full and supports economic growth ambitions.
- 3.35 The Local Plan seeks to address in full the need for new homes in St. Helens and consequently there is no current requirement to reach agreement with others to accommodate the Borough's needs elsewhere. Similarly, neighbouring authorities are preparing their own Local Plans to address their specific needs in full. Statements of Common Ground have been prepared with neighbouring and wider LCR authorities to ensure that strategically

important cross boundary issues have been properly considered when preparing the Plan.

- 3.36 As the Council are looking to exceed their current local housing need (434 dwellings per annum) by adopting an economic led housing requirement higher than the local housing need, the housing requirement should be assumed to be sound.

Factors Influencing Housing Need

- 3.37 The interaction between the housing market and economy is complex and influenced by a range of factors and uncertainties in how the economy will perform in the medium and longer-term. Many of these factors such as changes in economic participation as the workforce ages and unemployment fluctuates, new ways of working such as double-jobbing, part-time work and zero-hour contracts impact on the traditional relationship between housing and jobs. In the case of St. Helens its role within wider functional economic and housing market areas is also important.
- 3.38 Aside from the typical demographic factors considered in the SHMA, the Council consider there to be several other factors that will influence the actual housing need over the lifetime of the Plan, the key ones being:
- Labour supply- as outlined in the ELNS and SHELMA, and as evidenced by the recent applications for large scale B8 distribution uses in the Borough, St. Helens has a number of unique attributes that make it a highly favoured location for logistics (see Employment Land Need and Supply Background Paper – SD022 for further information). The ELNS demonstrates that many of these very large recent developments, such as those at the Omega strategic site in Warrington, attract commuters from a wide area well beyond local authority boundaries, reflecting both their location and strategic role and function. These sites therefore meet the employment needs of residents across a wide geography. Given that the majority of the SHBLP employment land allocations are for large scale B8 uses, there is a clear argument that much of St. Helens' B8 logistics offer will meet the employment needs of a wider sub-region (whilst also providing local job opportunities), whereas the Borough's housing need is much more localised;
 - Modest levels of job creation for B8 logistic uses - the extent to which the employment land allocations, the majority of which are for large, strategic distribution developments will drive up employment land take-up whilst delivering a comparatively modest level of new jobs. These developments are typically land hungry, creating a modest level of employment within the context of the scale of development;
 - Automation - when considering the likely level of job creation on the proposed employment allocations BE Group took into account the effects of automation and efficiency improvements that will affect the

level of labour required on site. Improvements in inventory handling and automation of stock retrieval will reduce labour needs in the logistics sector. Therefore, there is likely to be some tapering off of employment on the Local Plan employment sites in the years after they become fully operational; and

- Macro-economic factors - the high degree of economic uncertainty at present resulting from Covid 19, Brexit and the future impact of changing working practices.

Reasonable Assumptions

3.39 There is clearly an element of judgement to be attached to the selection of the data inputs and how these are likely to change over time in the calculation of housing needs. In considering what assumptions were reasonable to use in the SHMA and ELNS modelling, the Council and its consultants G L Hearn and BE Group have applied professional judgement. Key assumptions and factors considered were:

- Reducing out-commuting - there is an argument that increasing the proportion of St. Helens residents that also work in the Borough could be a further supply of labour, thereby reducing the number of new homes required in the Borough. It is an aspiration of the Council to maintain or produce more employment in the Borough in order to reduce the export of labour from both a sustainability and economic perspective. However, whilst this is an aspiration of the Council and one that will be helped by providing more employment opportunities and by protecting existing employment sites through the Local Plan, the reality is that it would be a 'policy on' assumption that could be influenced by a number of variables, many of which are beyond the Council's control. Such as the net number of new jobs created on the employment sites, wider employment opportunities and the performance of the wider UK economy. In addition, such an approach would have to be acceptable through the DtC to all the other authorities affected (Warrington, Knowsley, Liverpool, Wigan and Halton would be most affected). Therefore, the modelling for the ELNS and SHMA assume that commuting patterns keep to current characteristics and patterns;
- Economic activity rates - the Economic Activity Rate (EAR) assumptions used in the SHELMA and subsequent St. Helens 2019 SHMA update reflect the fact that the EAR is significantly lower in the Liverpool City Region than nationally. As a result, the City Region has a significantly larger latent workforce than the average local authority. G L Hearn considered that using an alternative approach such as utilising a national growth rate such as OBR, even when adjusted to a local starting point would underestimate the growth potential in areas with

low economic activity rates and over-estimate growth in areas of high economic activity rates. While it is recognised that the Oxford Economic rates can change significantly between iterations the same can also be said about other sources such as Experian or OBR rates. Therefore, it was considered that the locally specific approach adopted in the SHELMA which models a theoretical increase from 75.3% to 76.5% for St. Helens (a multiplier of 1.01) was also appropriate for use in the SHMA; and

- Unemployment rate - no adjustments were made to the employment rate in the ELNS and SHMA modelling as it is considered that unemployment is relatively low and further significant improvements are unlikely⁶.

Criticism of the Local Plan Housing Requirement

- 3.40 Various representors to the Plan have used their own modelling to suggest that the level of employment growth proposed in the Plan will create much higher job growth and therefore require a much higher level of housing provision. As previously set out, the job growth figures prepared by BE group reflect locally specific factors such as commuting, the geography of the Borough and job growth experienced on existing sites in the Borough. Therefore, to assume the need for such higher levels of housing provision would be contrary to current local market signals and could lead to a plan that was not deliverable or justified.
- 3.41 Drawing conclusions on how a local economy may perform in the longer term is inevitably a difficult exercise, given the multitude of potential influences on future economic performance together with economic uncertainties at both a national and local level. In that regard utilising job growth forecasts in excess of what is already being realised locally would not be realistic or justified. A higher housing requirement would also lead to an excessive loss of Green Belt, which is not justified by the evidenced level of need for new housing. This would conflict with national policy that seeks to protect the openness and purposes of the Green Belt. It could also mean that if the market were to fail to deliver at those high levels, the Council could rapidly lose its 5 year housing land supply and fail the Housing Delivery Test.
- 3.42 In addition, as BE Group indicate in the ELNS, the number of jobs at a given new employment site is not likely to be represented by a sudden jump to the maximum number of jobs, which would be constant from then on. Rather, it is likely to be a steep climb over some years, followed by a plateau and then a gradual decline as automation/efficiency factors become significant.

⁶ As of December 2019, the unemployment rate in the Borough was 4.3% compared to 4.1% regionally and 3.9% nationally (Nomis Official Labour Market Statistics 2019).

Therefore, if during the Plan period job growth in the Borough is higher than what has been assumed in the modelling in the SHMA and it therefore pushes up the affordability ratio (a key component of the Government's standardised method), then this is something the Council will be required to consider through a Local Plan review.

- 3.43 The Council's approach to determining its housing requirement has been subject to agreement with the other Mid-Mersey Housing Market authorities and the wider Liverpool City Region authorities. The Liverpool City Region LEP have also not raised any concerns about the proposed Local Plan housing requirement.
- 3.44 There have also been a significant number of local residents and other stakeholders who have argued that the housing requirement should be much lower, particularly given the need to release Green Belt land. The Council recognise the concerns of residents and this was reflected in a reduction to the level of employment land, and then a subsequent reduction in the proposed housing requirement, proposed in the Plan between the Preferred Options and Local Plan Submission stages. However, setting a lower housing requirement than 486 dwellings per annum, including utilising the current standard method figure of 434 dwellings per annum, would make no additional allowance for the increased housing need that is likely to result from the employment growth associated with the development of employment sites allocated in the Plan. It would therefore put in jeopardy a strategic aim of the Plan which is to support regeneration and balanced growth.

Development of the Local Plan Housing Requirement Through the Plan Preparation Process

- 3.45 The proposed housing target has changed throughout the process of Plan preparation. When Plan preparation commenced in 2016 it was estimated that as a minimum around 451 new homes per year would be required. At the Preferred Options stage the Council's preferred option was 570 new homes per year, this was considered necessary to deliver the proposed employment land allocations, but this has subsequently decreased to 486 dwellings per year. This is mostly due to a reduction in the amount of employment land proposed to be allocated in the Local Plan, but it is also due to methodological changes to the way that housing requirements are required to be calculated through the standard method, rather than any significant changes in the underlying demand and need for new homes in the Borough.

Stage 1: Local Plan Scoping Consultation January 2016

- 3.46 The Local Plan Scoping Consultation sought views on what level of housing growth St. Helens should plan for. Consultees were asked if they thought the OAN of 451 homes per annum up to 2037 established in the Mid-Mersey SHMA (January 2016) was appropriate for St. Helens. The OAN of 451 homes per year factored in forecasted economic growth for St. Helens from a Cambridge Econometrics Baseline Forecast from June 2015.

Stage 2: Preferred Options December 2016

- 3.47 The consultation focussed on a range of options for the quantum of development in the Borough; its distribution; and strategic sites. The housing requirement options put forward for consultation were:

1. Preferred Option: An annual average net housing requirement of 570 dwellings per year in order to meet the full OAN of 451 established in the 2016 Mid Mersey SHMA. It incorporated an uplift of just over 20% from the OAN (an increase to 541 per year) to take account of:
 - the Borough's ambitions to continue stabilising and increasing the population,
 - allow for more housing choice and competition so more households can afford to form, allow for significant economic growth and;
 - to reflect the high levels of housebuilding achieved in years before and after the 2008-2009 recession.

A further requirement of 29 per annum was added to accommodate the demolitions, this resulted in a housing requirement of 570 per annum.

The Preferred Options Housing requirement of 570 dwellings per annum was the same as the annual average net housing requirement of 570 set in the St. Helens Local Plan Core Strategy (2012). The Core Strategy requirement was set by the Regional Spatial Strategy for the North West and was a requirement for growth that was above housing need estimates. A growth approach in Local Plan was considered appropriate to help meet St. Helens development needs and economic growth plans.

2. Alternative Option 1: 451 dwellings per annum requirement for 2014 to 2033, based on the OAN figure of 451 identified by the Mid Mersey SHMA;
3. Alternative Option 2: 712 dwellings per annum requirement, which was 25% above the Preferred Option and current Core Strategy requirement;

4. Alternative Option 3: 912 dwellings per annum requirement, which was approximately 60% above the Preferred Option and current Core Strategy requirement of 570; and
 5. Alternative Option 4: A stepped housing requirement, starting at the OAN of 451 for five years, rising to 630 for the period 2018 to 2033, giving an overall average of 570 dwellings per annum over the period 2014 to 2033.
- 3.48 Options 2 and 3 (712 and 912 dwellings per annum) were rejected because they would both lead to an excessive loss of Green Belt, which is not justified by the evidenced level of need for new housing. This would conflict with national policy that seeks to protect the openness and purposes of the Green Belt.

Stage 3: Submission Draft Local Plan

- 3.49 The Local Plan Submission Draft proposed a housing requirement of 486 dwellings per annum which was substantially less than the figure of 570 per annum in the Preferred Options consultation document. This reduction was justified by the change of circumstances which had occurred since the Preferred Options stage, including a reduction in the amount of employment land to be released, the introduction of the national standard method, the new NPPF and related planning guidance, and the SHMA Update 2018.
- 3.50 There was considered to be no robust evidential basis to continue with a figure as high as 570 dwellings per annum. The Council's proposed annual housing requirement figure of 486 per annum, slightly exceeded the figure of 468 per annum that would of applied if the national standard method had been used at the time of when the LPSD Plan was published in January 2019 (the latest housing need figure as of 01.04.2020 is 434 dwellings per annum).

Meeting Housing Needs Beyond the Plan Period

- 3.51 The NPPF requires that when local planning authorities define Green Belt boundaries, they, where necessary, identify areas of safeguarded land to meet longer term needs stretching well beyond the Plan period. However, national planning policy and guidance does not set out how local planning authorities should determine what amount of land beyond the Plan period would be deemed adequate.
- 3.52 In the absence of national guidance, the Council have sought to use a practical and balanced approach to the designation of safeguarded land. Being mindful of the uncertainties that are inherent with calculating longer term needs and the need to demonstrate exceptional circumstances to justify the release of Green Belt land, the Council have not sought to identify a specific housing need figure for post 2035. The Council have instead

identified a reasonable amount of land to be safeguarded in order to meet future development needs. SHBLP Policy LPA06 identifies 8 sites to be removed from the Green Belt and safeguarded in order to meet longer term development needs beyond the Plan period. Policy LPA06 indicates that planning permission for the development of the safeguarded sites will only be granted following a future Local Plan Review that proposes such development.

- 3.53 While the Council have not used a specific methodology for calculating post-Plan period needs, the Plan period housing requirement is considered a reasonable basis to measure the provision of safeguarded land against. When projecting forward the housing requirement of 486 dwellings per year, the estimated combined capacity of the sites safeguarded for housing of 2,641 dwellings equates to 5.4 years of housing supply. If you remove the cap of 500 dwellings applied at site 3HS by Policy LPA06 (based on highway capacity issues), then the safeguarded sites provide for 6.4 years of housing supply.
- 3.54 It is important to recognise that the Plan also includes indicative post-2035 delivery of 3358 dwellings, from allocated housing (sites 2HA, 4HA, 5HA, 6HA and 10HA), the delivery of which is expected to continue well beyond 2035. Based on the Plan period housing requirement of 486 dwellings per annum, this equates to a further 6.9 years of housing land supply.
- 3.55 It is also reasonable to assume that additional windfall supply is likely to be realised. Applying a windfall allowance of 46 dwellings per annum (half the allowance in the Plan period), would equate to 690 dwellings / 1.4 years of supply.
- 3.56 In addition, in order to ensure that the 9,234 net housing requirement is met in full, the SHBLP (as updated by Appendix 5) applies a SHLAA capacity reduction (including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA and 10HA) for non-delivery of 15% for years 6-15 (437 dwellings) and a 20% buffer to the Green Belt allocations (186 dwellings) to allow for contingencies e.g. infrastructure provision, delays, lead-in times etc. There are two outcomes from this to consider in relation to safeguarded land:
- 1 The extra land assists with deliverability and enables the full 9,234 dwellings to be delivered by 2035. In this case, there is likely to remain a residual amount of land at the end of the Plan period (theoretically equal to the amount that is 'overprovided' in the Plan period– 623 dwellings). In this case, it could be argued that it is reasonable to assume that this land will be available for development in the next Plan period.

- 2 If all allocated land is fully-developed during the 2020-2035 Plan period and in excess of 9,234 dwellings are delivered by 2035, it could be argued that overprovision against need in 2020-2035 Plan period will reduce development requirements by an equivalent amount in the next Plan period.

3.57 It is also important to note that the Local Plan Preferred Options (2016) did seek to include 15 years of safeguarded housing land beyond the Plan period, on which the basis was projecting forward the then proposed 570 dwellings per annum housing requirement. However, there was significant opposition to this approach from local residents and stakeholders.

Affordable Housing Need and Delivery

- 3.58 Using the long-standing definition of affordable housing need (i.e. those who cannot afford to access market property) the 2019 SHMA identifies a need for 117 affordable homes per annum. This represents a slight improvement from the Mid-Mersey SHMA (2016). While the affordable housing need is falling this identified level of need notionally represents about 20% and 30% of all housing required in the Borough. There is still a need for the Council to pursue additional affordable housing through developer contributions. The SHMA indicates that this should be delivered primarily as social/affordable rented housing.
- 3.59 The extended definition of affordable housing includes households who are able to access the private rented sector but who cannot afford to buy. The SHMA indicates that in St. Helens there is limited evidence for a need for this type of housing; this is mainly due to the fact that second-hand housing to buy would require a similar level of income as renting an equivalent private sector home.
- 3.60 SHBLP Policy LPC02: Affordable Housing Provision sets targets for the provision of affordable housing within proposals for new open market housing of 11⁷ dwellings or more. In summary:
- at least 30% of new dwellings on greenfield sites in all parts of the Borough apart from those with the lowest viability (the town centre and Parr) must be 'affordable'; and
 - at least 10% of new dwellings on brownfield sites in the areas with highest development viability (Eccleston, Rainford and Rainhill) must be 'affordable' (these areas are therefore the areas where the highest overall proportion of affordable housing will be sought).

⁷ In line with revised NPPF (February 2019 version) Local Plan modification number AM087 seeks to change this requirement to 10 dwellings or more,

- 3.61 In response to the revised NPPF (February 2019) Policy LPC02 requires that where affordable housing is required, at least 10% of the overall number of homes to be provided on the site should be available for affordable home ownership (as opposed to social or affordable rented dwellings).
- 3.62 The Core Strategy requires 30% of all new homes in the Borough to be affordable. Table 3.1 below illustrates that over the last 8 years since the Core Strategy was adopted, an average of 24% of housing completions (gross) have been for affordable dwellings.

Table 3.1 Affordable Housing Completions 2012-2020

Year	Affordable Completions	% of Gross Completions
2012/13	178	55%
2013/14	142	28%
2014/15	112	18%
2015/16	122	21%
2016/17	66	13%
2017/18	80	18%
2018/19	128	16%
2019/20	192	25%
Average (per annum)	127	24%

Specific Housing Needs

Older Person Needs

- 3.63 The SHMA indicates that St. Helens has a population with a slightly higher proportion of older persons when compared with both the region and national average. For example, in 2016, 20.2% of St. Helen's population was estimated to be aged 65 or over whereas North West and England proportion was 18.3% and 17.9% respectively.
- 3.64 The population projection for St Helen's is expected to see a notable increase in the older person population with the total number of people aged 65 and over expected to increase by 27.3% over the 20-years from 2016; this compares with overall population growth of 4.0% and a decrease in the under 65 population of 1.9%.
- 3.65 Given the ageing population and higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist housing options moving forward.
- 3.66 The SHMA has drawn on data from the Housing Learning and Information Network (Housing LIN) to provide an indication of the potential level of additional specialist housing that might be required for older people in the

future, although the amount and type of specialist accommodation required will depend on a range of factors including individual choice.

- 3.67 The Housing LIN toolkit suggests that there should be around 170 dwellings of specialist accommodation per thousand people aged over 75 years. For the Borough, the change in the population aged 75+ would indicate a potential need for around 73 dwellings per annum over the plan period, with a broad tenure split of 40% rented (affordable housing) and 60% market housing. This is based on the SHMA economic growth scenario upon which the local plan housing requirement is based upon.
- 3.68 The SHMA also identifies that there may also be a requirement for additional Registered Care provision, such as nursing and residential care homes. The demographic modelling indicates an increase of around 480 people living in institutions over the plan period (28 per annum) based on the SHMA economic growth scenario upon which the local plan housing requirement is based upon.
- 3.69 SHBLP Policy LPC01: Housing Mix indicates that the Council will work with partners to facilitate the provision of specialist and supported housing for the elderly and vulnerable people.

People with Disabilities

- 3.70 The SHMA indicates that across St. Helens 40.6% of households contain someone with a long-term health problem or disability (LTHPD). This figure is higher than seen across the region (36.6%) and well above the national average (32.7%).
- 3.71 The estimated change over the plan period is set to increase this by around 6.254 people (a 14% increase) with the increase expected to be in age groups aged 65 and over. This is linked to the SHMA economic growth scenario upon which the local plan housing requirement is based upon.
- 3.72 The analysis from the SHMA shows that people with a LTHPD are more likely to live in social rented housing and are also more likely to be outright owners (this will be linked to the age profile of the population with a disability).
- 3.73 Given that typically the lowest incomes are found in the social rented sector and to a lesser extent for outright owners the analysis would suggest that the population/households with a disability are likely to be relatively disadvantaged when compared to the rest of the population.
- 3.74 SHBLP Policy LPC01 'Housing Mix' requires new housing to include a range of types, tenures and sizes of homes to meet the needs of different population groups. It requires that at least 20% of new dwellings on greenfield sites (of more than 25 dwellings) should (subject to viability) be designed to the 'accessible and adaptable' standard set out in Building Regulations, and that

at least 5% should be 'wheelchair accessible'. These requirements (together with a requirement for 5% of new dwellings on such sites to be bungalows) respond to the needs of the Borough's expanding population of elderly people and to those with physical disabilities.

Self-build and Custom Housebuilding

- 3.75 SHBLP Policy LPC01: Housing Mix, supports the delivery of suitably designed and located self-build and custom-build schemes in the Borough. In accordance with the Self-build and Custom Housebuilding Act 2015, the Council maintains a Register of individuals who wish to acquire serviced plots of land for themselves or as part of a group to bring forward self-build and custom housebuilding projects. The Council currently has 12 individual applicants on the Register. The majority of applicants would like detached dwellings with 3 to 4 beds. All applicants would prefer an individual self-build or custom housebuilding plot, with 4 applicants also interested in a group custom build, 3 of whom are from the same family and are looking for a larger plot to accommodate 4 detached dwellings in a semi-rural location.
- 3.76 The Mid-Mersey SHMA 2016 and the St. Helens SHMA 2019 update did not set a specific target, this was due to a very limited demand from individuals to be included on the Register (as of August 2018 there were only 7 individuals on the Register).
- 3.77 It is expected that most new delivery would be on small windfall sites; although there is some potential through policy to encourage developers of larger schemes to designate parts of these as plots available for custom build. Moving forward it is anticipated that as demand for self and custom build plots increases, further evidence of need for self and custom build plots will be considered by future SHMAs.

Gypsies and Travellers

- 3.78 National planning policy requires the Plan to effectively address the accommodation needs of gypsies and travellers. Existing Council provision stands at 29 pitches on private sites and 20 on Council owned sites. A further three sites exist providing approximately 14 pitches but without planning consent.
- 3.79 The Merseyside and West Lancashire Gypsy & Traveller Accommodation Assessment (GTAA) was undertaken in 2014. The GTAA found that across Merseyside and West Lancashire as a whole there was a need for 42 net additional permanent pitches between 2013/14 and 2032/33, of which 8 should be in St. Helens Borough. Of the 8 permanent pitches required in the Borough: 6 were required between 2013 and 2018; 1 between 2018 and 2023; and 1 between 2023 and 2033.

- 3.80 The GTAA also found a need for 3 transit pitches to be provided (capable of accommodating 6 touring caravans) for Gypsies and Travellers for the period 2013 to 2033. The GTAA did not identify a need for accommodation for Travelling ShowPeople.
- 3.81 Planning permission was granted in 2016 for 12 permanent pitches on land east of the existing Council owned Sherdley Road Caravan Park. This would more than meet the need for 8 permanent pitches identified in the GTAA. However, the net need for new pitches changes each year as occupancy of sites alters and pitches are gained and lost, and a rise in the numbers of occupiers on non-authorised sites in the Borough indicates that the overall (net) need for new pitches in the Plan period is likely to have risen to about 18 by 2016.
- 3.82 The existing permission for 12 pitches would therefore be likely, on its own, to fall short of meeting needs. For this reason, Policy LPC03 allocates an additional site (referenced GTA01 - to the west of the existing Council owned Sherdley Road Caravan Park) for the delivery of additional permanent provision. Its estimated capacity of 8 pitches is capable, in combination with the site with existing planning permission, of meeting the total estimated net need for permanent site provision over the Plan period. However, the Council will keep the need and supply of sites under regular review to ensure that needs can be met over the Plan period.
- 3.83 Site GTA02 (with an indicative capacity of 3 pitches) has been allocated to meet the need for transit site provision set out in the GTAA.
- 3.84 No provision has been made to meet needs beyond the Plan period as the GTAA found that looking ahead that far to assess needs was difficult. Accordingly, the preferred approach is for needs beyond the Plan period to be reviewed in the future taking account of relevant circumstances at the time.
- 3.85 Sites GTA01 and 02 have been identified for these uses for a substantial period of time and were included in the Preferred Options document.

4. Delivering the Local Plan Housing Requirement

Historic Delivery

- 4.1 Table 4.1 below illustrates the gross number of housing completions which have taken place between 1st April 2003 (the base date of the Core Strategy housing requirement) and 31st March 2020. It also shows net completions, taking account of demolitions and conversions.

Table 4.1: Housing Delivery 2003-2020

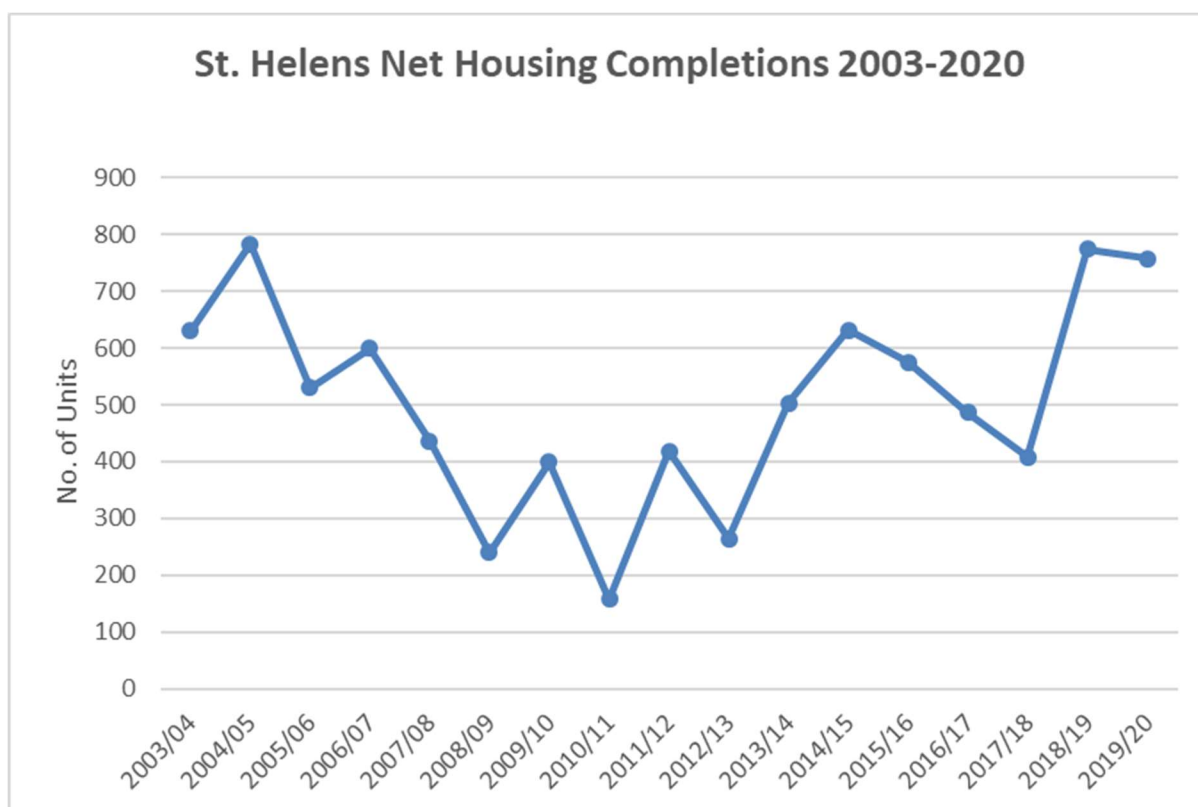
Year	Gross Completions	Demolitions / Conversions	Net Completions
2003/04	871	-240	631
2004/05	896	-113	783
2005/06	549	-19	530
2006/07	637	-37	600
2007/08	496	-60	436
2008/09	441	-201	240
2009/10	401	-2	399
2010/11	183	-26	157
2011/12	431	-12	419
2012/13	320	-56	264
2013/14	509	-6	503
2014/15	635	-3	632
2015/16	583	-8	575
2016/17	489	-2	487
2017/18	457	-49	408
2018/19	806	-31	775
2019/20	765	-7	758
Total	9469	-872	8597
Average (per annum)	557	-51	506

- 4.2 As shown in Table 4.1 765 gross dwellings (758 net) were completed in 2019/20, leading to a gross total of 5178 (4,978 net) built over the last 10 years, 7702 over the past 15 years (7183 net) and 9469 (8597 net) since 2003. The annual average rate of completions achieved over the past 10 years is 517 gross dwellings (497 net), over the past 15 years is 513 (479 net) and is 557 (506 net) since 2003.
- 4.3 Figure 4.1 illustrates that net completions peaked in 2004/05 and more recently in 2018/19 and 2019/20. Completions were highest in 2018/19 and 2019/20 reflecting accelerated delivery on Countryside Properties sites that are delivering private rented family units for Sigma Capital. These sites are the former Penlake Industrial Estate, Bold, where 102 of the 337 units are for

Sigma and 74 of 134 completions in 2019/20 were Sigma properties; the Former Deacon Trading Estate site extension, Earlestown, where 97 properties were completed for Sigma in 2019/20; and the former Sidac Sports and Social club site which completed in 2019/20, 55 of the 117 units are for Sigma.

- 4.4 The 2017- 2020 figures have also been boosted by a stronger than expected delivery rate on the Former Deacon Trading Estate, Earlestown (Persimmon Homes and Anwyl Homes) which has delivered 245 units over the past 3 years.

Figure 4.1: Net Housing Completions 2003-2020



- 4.5 The lowest levels of net additional homes were completed in 2010/11, this was at the height of the economic recession and the downturn of the housing market.
- 4.6 The Council adopted an Interim Planning Policy for Housing Developments in April 2005 when St. Helens was in a position of housing oversupply in relation to the maximum housing requirement of 400 dwellings p.a. set out in the now withdrawn RPG13. The interim planning policy restricted all development on greenfield sites and constrained development on previously developed land unless particular criteria were met. In April 2008, the interim policy was rescinded following the publication of the Secretary of State's Proposed Changes to the Draft RSS, which increased the housing requirement for St. Helens from 400 to 570 dwellings per annum.

- 4.7 Table 4.1 demonstrates that in recent years the highest rate of demolitions and conversions was 56 which took place in 2012/13. These losses were largely attributable to two schemes. One involved the loss of 28 units from the conversion of two newly built, but unoccupied, blocks of apartments to a residential care home (Concourse Way, Parr). The other involved the demolition of 19 sheltered houses and apartments (Hazel Grove, West Park). A total of 200 demolitions and conversions have taken place over the last ten years, with the majority carried out by Registered Providers. Registered Providers have confirmed that there are no significant clearance programmes planned for the Plan period therefore demolitions are likely to remain relatively low through the Plan period.

Previously Developed Land

- 4.8 The Core Strategy target for the delivery of new homes on previously developed land within St. Helens is 80%. The 80% target has been exceeded in four of the last ten years and was last significantly exceeded in the years 2010-2012.

Table 4.2: Percentage of gross housing completions on Previously Developed Land – 2010 to 2020

2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020
90%	91%	78%	72%	72%	63%	85%	85%	75%	79%

Ward	2006-2020 Net Housing Completions	Percentage of net housing growth 2006-2020	2015-2020 Net Housing Completions	Percentage of net housing growth 2015-2020
Billinge & Seneley Green	33	0.5%	11	0.4%
Blackbrook	26	0.4%	6	0.2%
Bold	411	6.2%	198	6.6%
Earlestown	860	12.9%	559	18.6%
Eccleston	358	5.4%	227	7.6%
Haydock	172	2.6%	32	1.1%
Moss Bank	221	3.3%	154	5.1%
Newton	974	14.6%	413	13.8%
Parr	568	8.5%	195	6.5%

Rainford	74	1.1%	24	0.8%
Rainhill	125	1.9%	76	2.5%
Sutton	283	4.3%	158	5.3%
Thatto Heath	935	14.1%	279	9.3%
Town Centre	879	13.2%	348	11.6%
West Park	510	7.7%	196	6.5%
Windle	224	3.4%	127	4.2%

Table 4.3: Housing Delivery by Ward 2006-2020

Percentage of Net Housing Growth by Ward 2006-2020

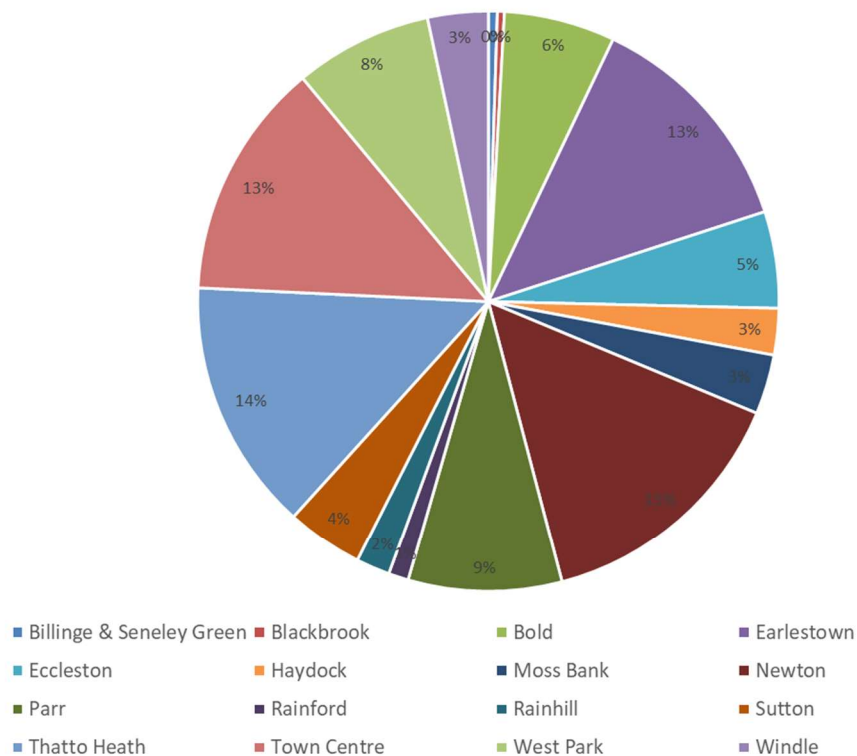


Figure 4.2: Percentage of Net Housing Growth by Ward 2006-2020

4.9 Table 4.3 and Figure 4.2 illustrate that since 2006 Newton, Thatto Heath, Earlestown and Town Centre wards have seen the most new homes built.

Blackbrook, Billinge and Seneley Green, Rainford and Rainhill wards have seen the least. In the past 5 years Earlestown, Newton and the Town Centre wards have experienced the highest levels of housing growth.

Windfall delivery

- 4.10 The SHLAA 2017 set out a small sites windfall allowance of 93 units per annum. The table below provides a 'sense-check' of the small sites allowance established in the 2017 SHLAA and applied in the SHBLP housing supply. Table 4.4 illustrates that small sites continue to make a strong contribution to housing delivery in the Borough, with the average gross completions from small sites averaging 103 units per annum over the past 10 years and 21% of all housing delivery in the Borough. Over the past 10 years the highest level of small sites delivery occurred in year 2018/19, this was due to a high number of apartment schemes being delivered (including Tolver House, Hardshaw, former Tyrers department store).

Year	Total number of gross completions	Gross completions on sites below 0.25ha	Expressed as a Percentage
2010 / 11	183	59	32%
2011 / 12	431	141	33%
2012 / 13	320	52	16%
2013 / 14	509	104	20%
2014 / 15	635	150	24%
2015 / 16	583	81	14%
2016 / 17	489	99	20%
2017 / 18	457	93	20%
2018 / 19	806	196	24%
2019 / 20	765	57	7%
Small sites average completions		103	21%

Table 4.4: Small Site Completions 2010-2020

- 4.11 The SHLAA 2017 also gave additional consideration to applying a windfall allowance for 'large sites' above the threshold of 0.25ha, however data at the time revealed that very few sites over 0.25ha were coming forward that were not previously identified within a SHLAA or as an allocation. For this reason, a separate windfall allowance for 'large sites' above the threshold of 0.25ha was not included in the SHLAA and therefore not in the SHBLP housing supply.

- 4.12 Since the SHLAA 2017 was published there have been 4 'windfall' sites over 0.25ha hectares delivering 126 units that were not counted in the SHLAA 2017 supply (total site capacity of these is 141 units). One of these sites delivered 97 units on a site the Council were aware of, as it had an outstanding permission for a mixed-use development as part of a wider residential scheme (Former Deacon Trading Estate extension). Based on the above, in accordance with the findings of the 2017 SHLAA there is not considered to be a robust basis to take forward a windfall allowance for sites above 0.25ha.
- 4.13 It should be noted that to avoid the potential for 'double counting' of the small sites windfall allowance with existing planning permissions, particularly in the early years of the Plan period, only large sites (sites over 0.25ha or delivering 5 units or more) with planning permission have been counted in the housing supply. As of July 2020, there were 135 'small' sites (0.25ha or less / or delivering less than 5 units) in the Borough with planning permission for a total of 486 units. These small sites have not been counted in the Plan period supply. Instead the Council is relying on a windfall allowance of 93 units per annum which is based on a long term trend of past delivery.

Housing Trajectory

- 4.14 Appendix 1 provides an indicative housing trajectory for the period 2020-2035. In accordance with the St. Helens Council Local Development Scheme (September 2020) the trajectory assumes an adoption date of 01/12/2021. The trajectory indicates that based on the Council's housing supply data at 31/03/2020, there will be a supply of 8,112 units over the Plan period. The housing trajectory is considered realistic and is based on sensible judgements being made about lead in times and build rates. Within the Plan period housing supply there is a good mix of types and size of site.
- 4.15 The trajectory illustrates a steady delivery rate early in the Plan period which rises to a high build out in mid-years of the Plan period when the Green Belt site allocations start to deliver significant completions. The delivery rate then levels out and tails off towards the end of the Plan period when the 'Other Supply' sites (SHLAA sites) are all delivered.
- 4.16 As a minimum, the Green Belt site allocations have a lead in time of 2.5 years from adoption of the Plan (which is estimated to be 01/12/2021) as the site promoters of these sites will be relying on the certainty of the Local Plan before they submit planning applications. However, some of the typical planning issues experienced initially through the planning approval process have been addressed by site promoters through the promotion of these sites through the plan-making process over several years, so this should speed up the planning approval process.
- 4.17 Many of the urban sites on brownfield land are considered developable, but do have constraints such as land contamination, which will take some time to

address, which means it is envisaged that some of them will not start delivering until the middle of the Plan period.

4.18 The build out rate assumptions utilised in the trajectory are slightly lower than what some developers have indicated they expect to deliver on the allocated sites (for example, on sites 2HA, 4HA and 8HA). The Council have taken a slightly cautious approach to assumed build out rates, given the current market uncertainty surrounding the economic impact of COVID19, the supporting infrastructure required to deliver some of the sites and the fact that quite a lot of large former Green Belt sites will be coming to the market at the same time.

4.19 Build out rate assumptions for major sites have been informed by an analysis of build out rates from developments over 50 units in St. Helens over the past ten years (as shown in Appendix 6).

4.20 The following build out rates have been applied:

- Housing allocations on sites to be released from the Green Belt: 40 units per annum on sites below 250 units;
- Housing allocations on sites to be released from the Green Belt: 45 units per annum on sites of 250 units or more;
- Bold Garden Suburb site (4HA): 60 units per annum, but given the size of the site this could be higher depending on how many housebuilders and sales centres are operational at one time; and
- In accordance with the methodology of the 2017 SHLAA, for housing allocations on sites to be allocated in the urban area and sites counted in the SHLAA housing supply: 20 units per annum on sites below 50 units, 30 units per annum on sites of 50-150 units and 45 units per annum on sites more than 150 units.

4.21 The lead in times for the sites have followed the SHLAA methodology as set out below.

Type of site	Under construction	Full permission / reserved matters	Outline permission	Without permission
Lead in time	None	1.5 years	2 years	2.5 years

Table 4.5 Lead in times for sites in the housing trajectory

4.22 There are two exceptions to the lead in times identified above:

- 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; and
- For site 4HA, a lead in time of 7 years on adoption of the Plan is to allow for a thorough masterplanning process and preparation of a site-specific SPD to be prepared.

- 4.23 A 5 year supply position at 31/03/2020 is illustrated in Appendix 2. This demonstrates that the Council has a 5 year supply of deliverable housing land against the SHBLP housing requirement of 486 units per annum when allowing for Local Plan allocations. This 5 year supply position assumes a Plan adoption date of 01/12/2021.
- 4.24 Appendix 3 provides a full update in relation to progress on sites identified in the 2017 SHLAA housing supply and identifies any new large sites that have obtained planning permission since the SHLAA was published in 2017 (up to 31.03.2020). Any new large sites with planning permission are counted in the Plan period housing supply.
- 4.25 The assessment of deliverability of sites and lead in times informing the housing trajectory in Appendix 1 has taken into consideration the latest guidance. The PPG (Paragraph: 007 Reference ID: 68-007-20190722) indicates that evidencing the deliverability of sites may include:
- *“current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
 - *firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
 - *firm progress with site assessment work; or*
 - *clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.”*

Local Plan Housing Site Allocations

- 4.26 The SHBLP proposes that a minimum of 9,234 dwellings be delivered from 1 April 2016 until 31 March 2035, at an average of at least 486 units per annum. 10 site allocations are identified to accommodate housing development within the Plan period of which 4 are large brownfield sites in the urban area and 6 are to be removed from the Green Belt. 8 sites are to be removed from the Green Belt and safeguarded to meet potential housing development needs after 2035.
- 4.27 Since 2008 the Council have invited housing site submissions through the SHLAA process and there were specific Local Plan call for sites in 2013, 2016 and at the LPPO stage call for site submissions were also invited. All sites submitted in Call for Sites between 2008 and 2017 have been subject to assessment by the Council in the SHLAA (for urban housing sites) or the St Helens Green Belt Review (2018).

- 4.28 The Green Belt Review considered the suitability of broad areas and then where appropriate, assessed individual sites. All of the Local Plan Preferred Options (LPPO) sites and reasonable alternatives were subject to SA. A total of 62 sites were identified as reasonable alternatives for housing development prior to the consultation on the LPPO.
- 4.29 The St Helens Green Belt Review has used a methodology in which parcels of Green Belt land were sieved out at different stages if they are not considered suitable for development. A number of sites were found to be unsuitable at Stage 1b (assessment against Green Belt purposes) whilst others were sieved out at Stage 2a (assessment against other prohibitive constraints). Sites which were sieved out were not progressed to Stage 2b ('Assessment of development potential within remaining parcels and sub-parcels') of the Green Belt Review.
- 4.30 In summary the site selection process for the SHBLP housing allocations was informed by:
- The Green Belt Review (2018);
 - The 2017 SHLAA;
 - The LPSP SA/SEA and HRA;
 - The results of the Local Plan Transport Impact Assessment (2018); and
 - The spatial strategy and vision of the Plan. As far as practicable, in accordance with the spatial strategy and vision of the Plan the Council have sought to focus development on the Key Settlements (St. Helens Core Area; Blackbrook and Haydock; Newton le Willows and Earlestown; Rainford; Billinge; Garswood; and, Rainhill) with the aim of achieving balanced growth across the Borough.

Risks to Delivery and Monitoring

- 4.31 A key priority of the SHBLP is to maximise housing delivery on previously developed land within existing urban areas. Table 5.3 in Appendix 5 identifies that sites in the urban area (as at 31.03.2020) have a total capacity of 6,312 dwellings. This figure includes sites with planning permission, sites under construction, other sites identified as suitable for housing including proposed Local Plan allocations (non-Green Belt sites) and an allowance of 93 units per annum from small windfall sites of less than 0.25ha (based upon past delivery rates). The largest sites are allocated in the SHBLP as sites 3HA, 6HA, 9HA and 10HA.
- 4.32 Some of the SHLAA sites are subject to physical or other constraints that could affect their rate of development, for example due to the need to deal with contamination caused by previous industrial activities. An allowance of 15% (437 dwellings) has been made for reduced delivery on the SHLAA sites (including non-Green Belt site allocations 3HA, 6HA, 9HA and 10HA) over the later years of the Plan period (6-15 years). Total delivery from sites in the

urban area is expected to fall short of the total housing delivery required to meet the housing requirement of 9,234 new dwellings. As a result, the proposed housing land supply includes 6 sites to be released from the Green Belt.

- 4.33 In order to provide flexibility in the housing supply a 20% increased allowance has been added to the Green Belt required capacity to allow for contingencies such as infrastructure provision. It is considered that this will help ensure a flexible and deliverable supply can be maintained in the Plan period, given the inherent uncertainty associated with the delivery of some of the brownfield land sites and the current market uncertainty surrounding the economic impact of COVID19.
- 4.34 In addition, as outlined in section 3, the SHBLP (as updated by the housing trajectory in Appendix 1 of this Paper and Proposed Modifications number AM029, which updates Table 4.5 in the LPSD) includes indicative post-2035 delivery of 3,358 dwellings projected on the allocated housing sites 2HA, 4HA, 5HA, 6HA and 10HA (see Policy LPA05), the delivery of which is expected to continue well beyond 2035. Based on the Plan period housing requirement of 486 dwellings per annum, this would equate to 6.9 years of housing land supply.
- 4.35 It is considered that this additional ‘buffer’ of housing land will also allow for:
- Potentially higher future requirements based on any future update of the Government’s standard method for calculating housing need; and
 - Meeting the NPPF requirement in relation to Paragraph 14 and the presumption in favour of sustainable development, especially related to the second bullet point which states:

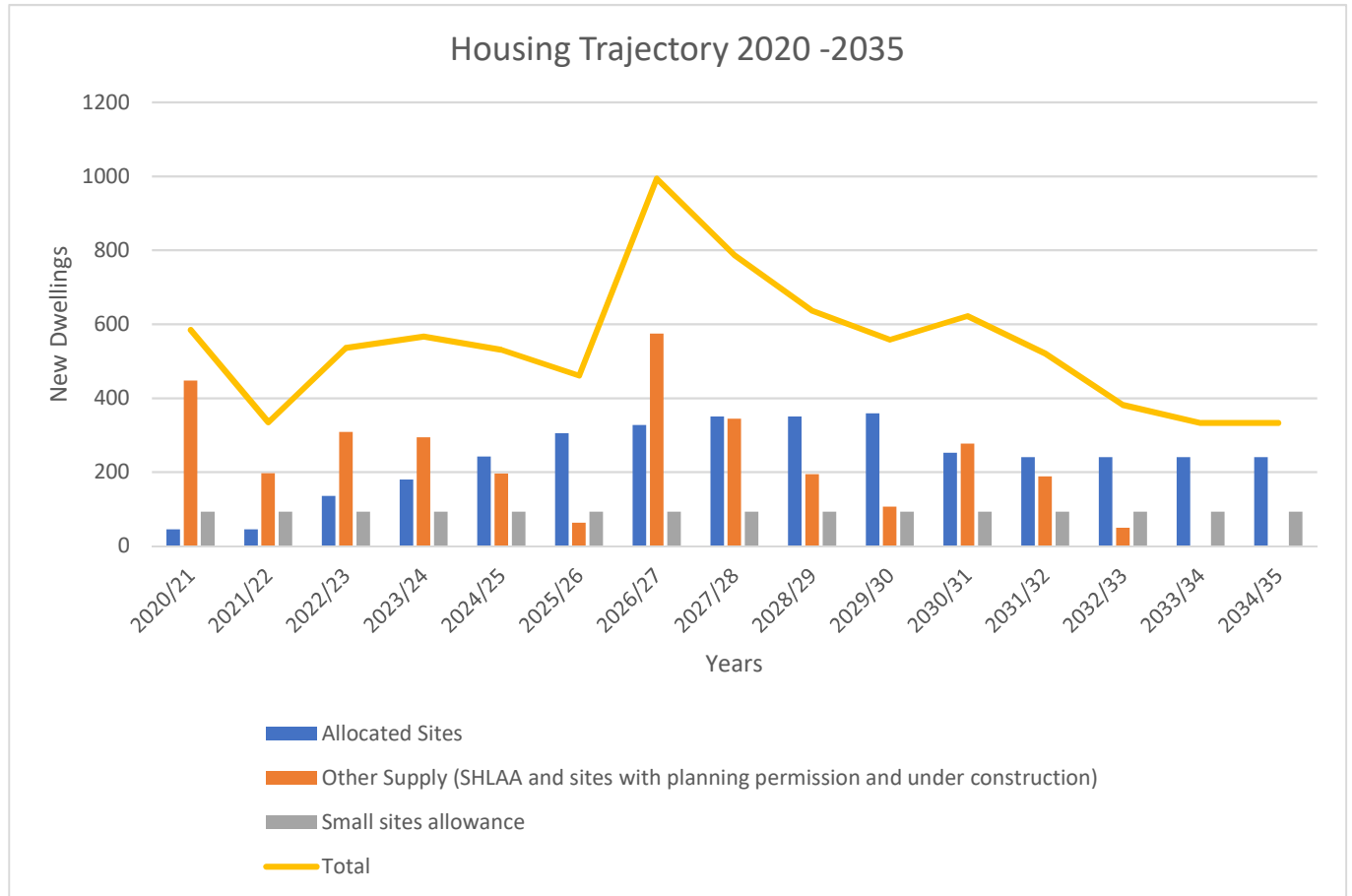
“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- specific policies in this Framework indicate development should be restricted.”*

- 4.36 The overall contribution from the different sources of land is summarised in Table 4.6 of the SHBLP which is updated in Appendix 5 of this Paper.
- 4.37 In addition, as stated earlier housing delivery will be monitored annually to ensure that there is a deliverable 5 year supply and there is a requirement for a Local Plan review after 5 years. Such mechanisms will allow the Council to identify any potential problems with housing delivery well before the end of the Plan period.

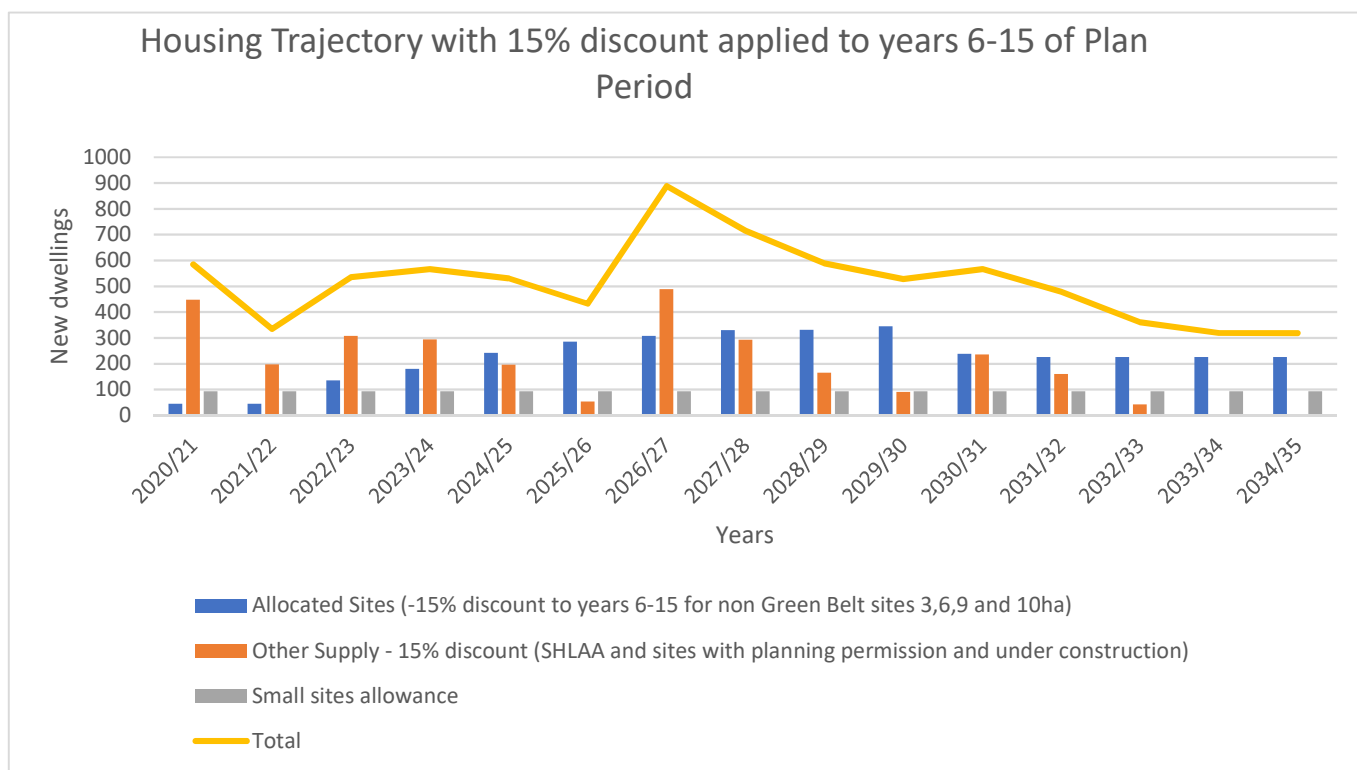
Appendix 1: Local Plan Housing Trajectory

Plan Trajectory 2020-2035



Year	Allocated Sites	Other Supply (SHLAA and sites with planning permission and under construction)	Small sites allowance	Total Dwellings
2020/21	45	447	93	585
2021/22	45	197	93	335
2022/23	135	308	93	536
2023/24	180	294	93	567
2024/25	242	196	93	531
2025/26	305	63	93	461
2026/27	327	574	93	994
2027/28	350	344	93	787
2028/29	350	194	93	637
2029/30	359	106	93	558
2030/31	252	277	93	622
2031/32	240	188	93	521
2032/33	240	49	93	382
2033/34	240	0	93	333
2034/35	240	0	93	333
Total				8,182

Plan Trajectory 2020-2035 with a 15% discount applied to years 6-15 of the SHLAA Supply and non-Green Belt allocations (3HA, 6HA, 9HA and 10HA)



Year	Allocated Sites (-15% discount to years 6-15 for non-Green Belt site allocations 3,6,9 and 10ha)	Other Supply - 15% discount (SHLAA and sites with planning permission and under construction)	Small sites allowance	Total Dwellings
2020/21	45	447	93	585
2021/22	45	197	93	335
2022/23	135	308	93	536
2023/24	180	294	93	567
2024/25	242	196	93	531
2025/26	285	54	93	432
2026/27	307	488	93	888
2027/28	330	292	93	715
2028/29	331	165	93	589
2029/30	345	90	93	528
2030/31	238	235	93	566
2031/32	226	160	93	479
2032/33	226	42	93	361
2033/34	226	0	93	319
2034/35	226	0	93	319
Total				7,750⁸

⁸ Please note that the total supply for 2020-2035 is 7750 dwellings, this is 5 units more than the total housing supply figure of 7745 units as of 31.03.2020 shown in Table 5.5 in Appendix 5 due to the rounding of the 15% discount to the individual plan years.

Housing Supply 2020-2035 (as of 31.03.2020)		Number of dwellings
Deliverable 0-5 years	Large sites - planning permission not started (including SHLAA 2017 sites that have since gained planning permission but not started)	648
	Large sites - planning permission under construction (including SHLAA_2017 and new large sites with planning permission and under construction)	526
	Large sites - SHLAA sites (including SHLAA 2017 sites with planning permission that has now expired)	268
	Local Plan Allocations (including those previously counted as SHLAA sites 3HA, 6HA, 9HA and 10HA)	647
	Small sites - allowance (93 x 5)	465
	Sub total	2554
Developable 6-10 years	Large sites - planning permission not started (including SHLAA 2017 sites that have since gained planning permission but not started)	128
	Large sites - planning permission under construction (including SHLAA_2017 and new large sites with planning permission and under construction)	0
	Large sites - SHLAA sites (including SHLAA 2017 sites with planning permission that has now expired)	1153
	Local Plan Allocations (including those previously counted as SHLAA sites 3HA, 6HA, 9HA and 10HA)	1691
	Large sites - historically implemented but stalled	0
	Small sites - allowance (93 x 5)	465
	Sub total	3437
Developable 11-15 years	Large sites - planning permission not started (including SHLAA 2017 sites that have since gained planning permission but not started)	0
	Large sites - planning permission under construction (including SHLAA_2017 and new large sites with planning permission and under construction)	0
	Large sites - SHLAA sites (including SHLAA 2017 sites with planning permission that has now expired)	279
	Local Plan Allocations (including those previously counted as SHLAA sites 3HA, 6HA, 9HA and 10HA)	1212
	Large sites - historically implemented but stalled	235
	Small sites - allowance (93 x 5)	465
	Sub total	2191
TOTAL		8,182

Housing Trajectory 2020 – 2035 (as of 31.03.2020, including an update to all 2017 SHLAA sites and any new sites with planning permission)

SHLAA & Local Plan Ref	Site Name	Site capacity	Units completed	Outstanding capacity	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	0-5 yrs	Plan period total	Total post 2035	Change since 2017 SHLAA as of 31.03.2020
1HA (Local Plan Allocation)	Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood	216	0	216	0	0	0	0	20	40	40	40	40	36	0	0	0	0	0	20	216	0	N/A
2HA (Local Plan Allocation)	Land at Florida Farm (South of A580), Slag Lane, Blackbrook	522	0	522	0	0	0	0	0	0	22	45	45	45	45	45	45	45	45	0	382	140	N/A
3HA (Local Plan Allocation)	Penlake Industrial Estate Land at Emr Recycling And Former British Rail Club, Railway Embankment	337	134	203	45	45	45	45	23	0	0	0	0	0	0	0	0	0	0	203	203	0	134 units completed.
4HA (Local Plan Allocation)	Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb)	2,988	0	2,988	0	0	0	0	0	0	0	0	0	60	60	60	60	60	60	0	360	2628	N/A
5HA (Local Plan Allocation)	Land South of Gartons Lane and former St.Theresa's Social Club, Gartons Lane, Bold	569	0	569	0	0	0	0	22	45	45	45	45	45	45	45	45	45	45	22	472	97	N/A
6HA (Local Plan Allocation)	Land east of City Road, Cowley Hill	816	0	816	0	0	0	45	45	45	45	45	45	45	45	45	45	45	45	90	540	276	Site is the subject of a live planning application (P/2020/0083/OUEIA) for up to 1200 units.
7HA (Local Plan Allocation)	Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line, Newton-le-Willows	181	0	181	0	0	0	0	20	40	40	40	40	1	0	0	0	0	0	20	181	0	N/A
8HA (Local Plan Allocation)	Land South of Higher Lane and East of Rookery Lane, Rainford	259	0	259	0	0	0	0	22	45	45	45	45	45	12	0	0	0	0	22	259	0	N/A

SHLAA & Local Plan Ref	Site Name	Site capacity	Units completed	Outstanding capacity	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	0-5 yrs	Plan period total	Total post 2035	Change since 2017 SHLAA as of 31.03.2020
9HA (Local Plan Allocation)	Land north of Elton Head Road	352	0	352	0	0	45	45	45	45	45	45	45	37	0	0	0	0	0	135	352	0	Site obtained outline planning permission (P/2018/0060) for 352 units in June 2018.
10HA (Local Plan Allocation)	Moss Nook Urban Village, Watery Lane	802	0	802	0	0	45	45	45	45	45	45	45	45	45	45	45	45	45	135	585	217	A £2M grant has been secured from the LCR SIF to accelerate development of the site. The funding will help unlock the first phase of the site (circa 240 units) through financially contributing to the construction of a spine road and associated infrastructure. Groundworks are ongoing.

SHLAA & Local Plan Ref	Site Name	Site capacity	Units completed	Outstanding capacity	2020 /21	2021/ 22	2022/ 23	2023 / 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	0-5 yrs	Type of site	Plan period total	Total post 2035	Change since 2017 SHLAA as of 31.03.2020
1	Land rear of 1-27 Station Road	12	0	12	0	0	10	2	0	0	0	0	0	0	0	0	0	0	0	12	SHLAA_2017	12	0	Live planning application for 14 units (P/2019/0794/FUL)
3	Land At Weymouth Avenue and Portland Way St Helens	52	36	16	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	16	SHLAA_2017 - now with planning permission and under construction	16	0	Site is under construction. As per the planning permission the site has been combined with SHLAA 2017 sites 4 and 5. 36 units complete and 16 outstanding.
10	Land at junction of Sunbury Street and Fir Street	30	0	30	0	20	10	0	0	0	0	0	0	0	0	0	0	0	0	30	SHLAA_2017 - now with planning permission and not started	30	0	Site gained planning permission in May 2019 (P/2018/0882/FUL) for the erection of 30 dwellings.
13	Land rear of Carnegie Crescent and Goodban Street	7	0	7	0	0	0	0	0	0	7	0	0	0	0	0	0	0	0	0	SHLAA_2017	7	0	No change. Site is in Helena Homes ownership who have indicated that they still intend to develop it.
18	Land at Somerset Street and Sussex Grove	66	0	66	0	0	0	0	0	0	30	30	6	0	0	0	0	0	0	0	SHLAA_2017	66	0	No change. This site is in Helena Homes ownership who have indicated that they still intend to develop it.
19	Leyland Green Road	7	0	7	0	0	0	0	0	0	7	0	0	0	0	0	0	0	0	0	SHLAA_2017	7	0	P/2019/0728/FUL – application for 9 dwellings – withdrawn – 26.11.19. United Utilities objected to the site layout as it would compromise their ability to access the significant water main to the north of the site.
22	Land at corner of Fairclough Street and Wargrave Road	14	0	14	0	0	0	0	0	0	14	0	0	0	0	0	0	0	0	0	SHLAA_2017	14	0	No change
23	Liverpool Arms and former Sacred Heart RC Church and School, Borough Road	29	0	29	0	0	10	19	0	0	0	0	0	0	0	0	0	0	0	29	SHLAA_2017	29	0	No change, but development of the site remains a priority for the Council given its prominent town centre location.
25	Alexandra Park - Former Pilkington HQ	162	0	162	0	0	0	0	0	0	45	45	45	27	0	0	0	0	0	0	SHLAA_2017	162	0	No change. There is still developer interest in the site.

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SHLAA & Local Plan Ref	Site Name	Site capacity	Units completed	Outstanding capacity	2020 /21	2021/ 22	2022/ 23	2023 / 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	0-5 yrs	Type of site	Plan period total	Total post 2035	Change since 2017 SHLAA as of 31.03.2020
27	Former Bethell Mission Bowling Green, Marsden Avenue	10	0	10	0	0	0	0	0	0	10	0	0	0	0	0	0	0	0	0	SHLAA_2017	10	0	No change
31	Former Sutton Arms PH, Elephant Lane	18	0	18	0	0	0	0	0	0	18	0	0	0	0	0	0	0	0	0	SHLAA_2017	18	0	No change
36	Land & Premises at Lords Fold	58	0	58	0	0	30	28	0	0	0	0	0	0	0	0	0	0	0	58	SHLAA_2017 - now with planning permission and not started	58	0	Site obtained outline planning permission (P/2017/0789) in May 2018 for 58 units. Further planning permission relating to the relocation of the existing employment use on a neighbouring site has since been obtained (P/2020/0082/FUL) . Reserved matters / new full application is being progressed.
58	Former Central Works, Church Road	48	0	48	0	0	0	0	0	0	20	20	8	0	0	0	0	0	0	0	SHLAA_2017	48	0	No change.
59	Site of former 56-120 Eccleston Street	13	0	13	0	0	0	0	0	0	13	0	0	0	0	0	0	0	0	0	SHLAA_2017	13	0	No change
60	Vacant land adjacent to Rail Line, Elephant Lane	112	0	112	0	0	0	0	0	0	30	30	30	22	0	0	0	0	0	0	SHLAA_2017	112	0	No change
61	Land North and South of Corporation Street	169	0	169	0	0	0	0	0	0	45	45	45	34	0	0	0	0	0	0	SHLAA_2017	169	0	No change
63	Land at Waterdale Crescent	10	0	10	0	0	0	0	0	0	10	0	0	0	0	0	0	0	0	0	SHLAA_2017	10	0	No change
64	BT Depot, Sutton Road	36	0	36	0	0	0	0	0	0	0	0	0	0	20	16	0	0	0	0	SHLAA_2017	36	0	No change but wider Moss Nook site (SHLAA site 9) has received grant funding to help deliver phase 1.
65	Former Pumping Station, Sutton Road	10	0	10	0	0	0	0	0	0	10	0	0	0	0	0	0	0	0	0	SHLAA_2017	10	0	No change but wider Moss Nook site (SHLAA site 9) has received grant funding to help deliver phase 1.

St. Helens Borough Local Plan 2020-2035 Housing Need and Supply Background Paper (October 2020)

SHLAA & Local Plan Ref	Site Name	Site capacity	Units completed	Outstanding capacity	2020 /21	2021/ 22	2022/ 23	2023 / 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	0-5 yrs	Type of site	Plan period total	Total post 2035	Change since 2017 SHLAA as of 31.03.2020
66	Land off Wargrave Road	7	0	7	0	0	0	0	0	0	7	0	0	0	0	0	0	0	0	0	SHLAA_2017	7	0	No change
69	Site of former Parr Community High School, Fleet Lane	54	0	54	0	0	0	0	0	0	30	24	0	0	0	0	0	0	0	0	SHLAA_2017	54	0	No change
72	Site of former St. Marks Primary School, Willow Tree Avenue	18	0	18	0	0	0	0	0	0	18	0	0	0	0	0	0	0	0	0	SHLAA_2017	18	0	No change
74	Site of former 119-133 Crow Lane West	9	0	9	0	0	0	0	0	0	0	0	0	0	9	0	0	0	0	0	SHLAA_2017	9	0	No change
75	Christ Church Parish Hall, Chapel Lane	7	0	7	0	0	7	0	0	0	0	0	0	0	0	0	0	0	0	7	SHLAA_2017 - now with planning permission and not started	7	0	Site now has outline planning permission for 7 units (P/2018/0749). Site has not started.
78a	Former St. Helens Glass, Corporation Street	130	0	130	130	0	0	0	0	0	0	0	0	0	0	0	0	0	0	130	SHLAA_2017 - now with planning permission and under construction	130	0	The northern part of the site now has a planning permission (P/2017/0634) for affordable rent apartments for 130 units which is under construction and nearing completion. Site has now been split into two sites - 78a and 78b.
78b	Former St. Helens Glass, Corporation Street	100	0	100	0	0	0	0	0	0	30	30	30	10	0	0	0	0	0	0	SHLAA_2017	100	0	Site has been split from 78a. Assumed density is 70 dwellings per hectare with a 90% net developable area.
82	Land adjacent Laffak Road and Carr Mill Road	150	0	150	0	0	45	45	45	15	0	0	0	0	0	0	0	0	0	135	SHLAA_2017	150	0	Site was the subject of a planning application for a mixed use scheme including 150 residential units comprising of 57 houses,1 bungalow, and 92 apartments (P/2019/0036/FUL) which was withdrawn in November 2019, to allow for flood risk, landscaping and acoustic issues to be addressed. Revised application likely soon.

St. Helens Borough Local Plan 2020-2035 Housing Need and Supply Background Paper (October 2020)

SHLAA & Local Plan Ref	Site Name	Site capacity	Units completed	Outstanding capacity	2020 /21	2021/ 22	2022/ 23	2023 / 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	0-5 yrs	Type of site	Plan period total	Total post 2035	Change since 2017 SHLAA as of 31.03.2020
84	Land adjacent Church of Christ, Heather Brae	9	0	9	0	0	0	0	0	0	9	0	0	0	0	0	0	0	0	0	SHLAA_2017	9	0	No change.
85	Site of former Our Lady's Primary School, Fleet Lane	54	16	38	30	8	0	0	0	0	0	0	0	0	0	0	0	0	0	38	SHLAA_2017 - now with planning permission and under construction	38	0	Site now has a planning permission for 54 units with 38 units outstanding (P/2018/0502).
87	Land west of Vista Road	33	0	33	0	0	0	0	0	0	0	0	0	0	20	13	0	0	0	0	SHLAA_2017	33	0	No change.
89	Land rear of 64-94 Marshalls Cross Road	32	0	32	10	22	0	0	0	0	0	0	0	0	0	0	0	0	0	32	SHLAA_2017 - now with planning permission and not started	32	0	Site now has full planning permission for 32 units (P/2019/0693). Site has not started.
90	Land to the West of Common Road	142	97	45	30	15	0	0	0	0	0	0	0	0	0	0	0	0	0	45	SHLAA_2017 - now with planning permission and under construction	45	0	Site now has full planning permission for 142 units (P/2016/0742). Site is under construction with 45 units outstanding.
91	Milton Street	25	0	25	0	0	0	0	0	0	20	5	0	0	0	0	0	0	0	0	SHLAA_2017	25	0	No change.
95	Site of former Carr Mill Infants School, Ullswater Ave	53	0	53	0	0	0	0	0	0	30	23	0	0	0	0	0	0	0	0	SHLAA_2017	53	0	No change.
96	Land rear of 350 Warrington Road	11	0	11	0	0	0	0	0	0	0	0	0	0	11	0	0	0	0	0	SHLAA_2017	11	0	No change.
102	Auto Safety Centre, Vicarage Road	9	0	9	0	0	0	0	0	0	9	0	0	0	0	0	0	0	0	0	SHLAA_2017	9	0	No change.
103	Land rear of 39-67 Valentine Road	10	0	10	0	0	0	0	0	0	10	0	0	0	0	0	0	0	0	0	SHLAA_2017	10	0	No change.
106	Site of former 126-154 Birchley Street and 107-125 Brynn Street	10	0	10	0	0	0	0	0	0	10	0	0	0	0	0	0	0	0	0	SHLAA_2017	10	0	No change.
109	Land adjacent Piele Road	13	0	13	0	0	0	0	0	0	13	0	0	0	0	0	0	0	0	0	SHLAA_2017	13	0	No change.
112	Land to the rear of Juddfield Street	41	0	41	0	0	0	0	0	0	0	0	0	0	20	20	1	0	0	0	SHLAA_2017	41	0	No change.

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SHLAA & Local Plan Ref	Site Name	Site capacity	Units completed	Outstanding capacity	2020 /21	2021/ 22	2022/ 23	2023 / 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	0-5 yrs	Type of site	Plan period total	Total post 2035	Change since 2017 SHLAA as of 31.03.2020
113	Land at Willow Tree Avenue	50	0	50	0	0	0	0	0	0	0	0	0	0	30	20	0	0	0	0	SHLAA_2017	50	0	No change.
114	Land at 19 and 25 Sutton Moss Road	14	0	14	0	0	0	0	0	0	0	0	0	0	14	0	0	0	0	0	SHLAA_2017	14	0	No change.
126	Former Halton and St Helens PCT HQ, Cowley Hill	32	0	32	0	0	10	20	2	0	0	0	0	0	0	0	0	0	0	32	SHLAA_2017	32	0	Site has a planning permission for the development of Specialist C2 75 unit scheme (P/2018/0535/FUL) Some of the planning conditions were discharged in 2018. However, C2 developer has now pulled out, site is now being considered for C3 use.
129	Derbyshire Hill Family Centre, Derbyshire Hill Road	12	0	12	0	0	0	0	0	0	0	0	0	0	12	0	0	0	0	0	SHLAA_2017	12	0	No change.
133	Land rear of 2-24 Massey Street	14	0	14	0	0	0	0	0	0	0	0	0	0	14	0	0	0	0	0	SHLAA_2017	14	0	No change.
134	Land at Littler Road	11	0	11	0	0	0	0	0	0	11	0	0	0	0	0	0	0	0	0	SHLAA_2017	11	0	No change.
135	Land at Newby Place	13	0	13	0	0	0	0	0		13	0	0	0	0	0	0	0	0	0	SHLAA_2017	13	0	No change
150	Former Red Quarry, Chester Lane	57	0	57	0	0	0	0	0	0	30	27	0	0	0	0	0	0	0	0	SHLAA_2017	57	0	No change.
151	Land adjacent St. Helens Hospital, Marshalls Cross Road	59	0	59	0	0	0	0	0	0	0	0	0	0	30	29	0	0	0	0	SHLAA_2017	59	0	No change.
152	Sidac Sports & Social Club, Applecorn Close	117	117	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	SHLAA_2017	0	0	Site gained planning permission (P/2017/0890) for 117 units and is now complete.
154	College Street Northern Gateway	103	0	103	0	0	0	0	0	0	30	30	30	13	0	0	0	0	0	0	SHLAA_2017	103	0	Site continues to be considered for residential use as part of the Council's / One Public Estate proposals for the Town Centre.
156	Land south of Crab Street	61	0	61	61	0	0	0	0	0	0	0	0	0	0	0	0	0	0	61	SHLAA_2017 - now with planning permission and under	61	0	Site has obtained planning permission (P/2018/0021) for 61 affordable rent

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SHLAA & Local Plan Ref	Site Name	Site capacity	Units completed	Outstanding capacity	2020 /21	2021/ 22	2022/ 23	2023 / 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	0-5 yrs	Type of site	Plan period total	Total post 2035	Change since 2017 SHLAA as of 31.03.2020
																					construction			units. Site is under construction.
HL496	Land at Elton Head Road, Lea Green	180	0	180	0	45	45	45	45	0	0	0	0	0	0	0	0	0	0	180	Planning permission : not started	180	0	Site now has a full planning permission (P/2019/0216).
NT03	Land to side and rear of 41-49 Old Wargrave Road	60	0	60	0	0	15	30	15	0	0	0	0	0	0	0	0	0	0	60	Planning permission : not started	60	0	SHLAA 2017 site with planning permission now expired (P/2016/0412).
HL417	Sherdley Remec Ltd Gorsey Lane Clock Face	18	17	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	Planning permission : under construction	1	0	1 unit outstanding (plot 18).
HL483	Ibstocks, Chester Lane	260	0	260	0	0	45	45	45	45	45	35	0	0	0	0	0	0	0	135	Planning permission : not started	260	0	Relevant conditions for site remediation were discharged in 2018 (site has full planning permission for site profiling and outline for residential use). Site levelling and profiling is being undertaken.
HL555	Viridor Glass Recycling, Lancots Lane	53	42	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	Planning permission : under construction	11	0	Site is under construction. 11 units are outstanding.
HL289	388 Clipsley Lane	5	0	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	Planning permission : under construction	5	0	Site has a full planning permission (P/2019/0817).
HL524	Clough Mill Blundells Lane	10	0	10	0	0	10	0	0	0	0	0	0	0	0	0	0	0	0	10	Planning permission : not started	10	0	Renewal of outline planning permission (P/2019/0812).
HL537	Windlehurst Youth Centre Gamble Avenue	12	0	12	0	10	2	0	0	0	0	0	0	0	0	0	0	0	0	12	Planning permission : not started	12	0	No change.
TH02	Land at Lea Green Colliery and Lowfield Lane Industrial Estate (Persimmon Homes)	160	156	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	Planning permission : under construction	4	0	Site is nearly complete.
HL202	Deacon Trading Estate	321	305	16	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	16	Planning permission : under construction	16	0	16 units outstanding.

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SHLAA & Local Plan Ref	Site Name	Site capacity	Units completed	Outstanding capacity	2020 /21	2021/ 22	2022/ 23	2023 / 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	0-5 yrs	Type of site	Plan period total	Total post 2035	Change since 2017 SHLAA as of 31.03.2020
HL310	Phase 3 (Aka 2b) Land Site Of Former Vulcan Works Wargrave Road	89	0	89	0	15	30	30	14	0	0	0	0	0	0	0	0	0	0	89	Planning permission : not started.	89	0	Reserved Matters Permission for P/2019/0217/FUL 89 dwellings this is an increase from 74 in the last SHLAA.
HL443	Land Off Lowfield Lane	104	53	51	30	21	0	0	0	0	0	0	0	0	0	0	0	0	0	51	Planning permission : under construction	51	0	51 units outstanding.
HL456	Land At Sorrel Way Clock Face	10	0	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	Planning permission : under construction	10	0	10 units outstanding.
WI14	Land Adjacent To Bleak Hill Farmhouse Bleak Hill Road Windle	7	2	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	Planning permission : under construction	5	0	5 units outstanding.
HL531	Land At Mere Grange Lowfield Lane	82	15	67	30	30	7	0	0	0	0	0	0	0	0	0	0	0	0	67	Planning permission : under construction	67	0	67 units outstanding.
NT06	Phase 4 Land Site Of Former Vulcan Works Wargrave Road	134	91	43	30	13	0	0	0	0	0	0	0	0	0	0	0	0	0	43	Planning permission : under construction	43	0	43 units outstanding.
HL525	Fishwicks Industrial Estate, Baxters Lane	93	0	93	0	0	30	30	30	3	0	0	0	0	0	0	0	0	0	90	Planning permission : not started	93	0	No change. Site has outline planning permission and demolition of some buildings commenced in 2017.
HL189	Land Off Monastery Lane	80	0	80	0	0	0	0	0	0	0	0	0	0	30	30	20	0	0	0	Planning permission : not started	80	0	No change.
RH11	Land off Stonecross Drive	8	1	7	0	0	0	0	0	0	0	0	0	0	7	0	0	0	0	0	Planning permission : historically stalled site	7	0	No change.
HL363	Land At Baxters Lane	84	0	84	0	0	0	0	0	0	0	0	0	0	30	30	24	0	0	0	Planning permission : historically stalled site	84	0	No change.
TC43	HQ Apartments (former AC Complex Site), Shaw Street	260	196	64	0	0	0	0	0	0	0	0	0	0	30	30	4	0	0	0	Planning permission : historically stalled site	64	0	No change.

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SHLAA & Local Plan Ref	Site Name	Site capacity	Units completed	Outstanding capacity	2020 /21	2021/ 22	2022/ 23	2023 / 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	0-5 yrs	Type of site	Plan period total	Total post 2035	Change since 2017 SHLAA as of 31.03.2020
HL666	3 Central Avenue Eccleston Park St Helens	13	0	13	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13	Planning permission : historically stalled site	13	0	None-SHLAA 2017 site with planning permission for 13 units P/2018/0802.
HL613	Millbrook Hostel 12 Mulcrow Close St Helens	16	4	12	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12	New large site with planning permission and under construction	12	0	None-SHLAA 2017 site with planning permission for 16 units P/2017/0395.
HL578	Carmelite Convent 1 Green Lane Eccleston St Helens	12	9	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	New large site with planning permission and under construction	3	0	None-SHLAA 2017 site with planning permission for 12 units P/2017/0068.

Appendix 2: Local Plan 5 Year Supply Position 31.03.2020

The 5 year supply position outlined below is based on the housing trajectory shown in Appendix 1

Local Plan 5 Year Housing Requirement	
Local Plan Annual Housing Requirement	486
Local Plan Housing Requirement 2016 - 2020	1944
Net Completions 2016 - 2020	2428
Housing Shortfall 2016 - 2020 (there has been an oversupply of 484 units)	0
Shortfall spread over next five years	0
Local Plan Housing Requirement 2020 - 2025 (486 x 5)	2430
Local Plan Housing Requirement 2020 - 2025 (5% buffer applied)	2552
Annualised Housing Requirement (2552/5)	510

Local Plan 5 year supply as of 31.03.2020	
Large sites - planning permission not started (including SHLAA 2017 sites that have since gained planning permission but not started)	648
Large sites - planning permission under construction (including SHLAA 2017 and new large sites with planning permission and under construction)	526
Large sites - SHLAA sites (including SHLAA 2017 sites with planning permission that has now expired)	268
Local Plan Allocations (including those previously counted as SHLAA sites, 3HA, 6HA, 9HA and 10HA)	647
Small sites allowance (93 x 5)	465
5 year supply	2554
Number of years supply of deliverable housing land (2554/510)	5.0

Appendix 3: 2017 SHLAA Large Sites with Planning Permission Update

SHLAA 2017 List of Large Sites with Planning Permission – Updated Position as of 31/03/2020

Ref	Site Name	Post Code	Ward	Land Type	Size	Site capacity	Units completed	Oustanding capacity	Not started / Under construction / Complete	Planning reference
NT06	Phase 4 Land Site Of Former Vulcan Works Wargrave Road	WA12 8RS	Newton	Brownfield	3.76 ha	134	91	43	UC	P/2016/0604
HL310	Phase 2b Land Site Of Former Vulcan Works Wargrave Road	WA12 8RN	Newton	PDL	2.54 ha	89	0	89	NS	P/2019/0217/ FUL 89
WI01	Polar Ford, City Road	WA10 6NZ	Windle	PDL	2.75 ha	87	87	0	COMP	P/2010/0276
HL343	The Black Horse, Moss Bank Road	WA11 7DF	Moss Bank	PDL/GF	0.42 ha	16	16	0	COMP	P/2016/0651
HL443	Land Off Lowfield Lane	WA9 5BB	Thatto Heath	PDL/GF	3.60 ha	104	53	51	UC	P/2012/0405
WI14	Land Adjacent To Bleak Hill Farmhouse Bleak Hill Road Windle	WA10 6DP	Windle	GF	0.25 ha	7	2	5	UC	P/2015/0026
HL445	Rainford Ex Servicemens Club 36 Cross Pit Lane Rainford St Helens	WA11 8AJ	Rainford	PDL	0.46ha	10	10	0	COMP	P/2015/0369
HL449	107 St Helens Road Eccleston Park	L34 6HP	Eccleston	PDL	0.77 ha	7	7	0	COMP	P/2017/0440
HL456	Land At Sorrel Way Clock Face	WA9 4YN	Bold	PDL	0.36 ha	10	0	10	UC	P/2018/0908
HL471	Former Penlake Industrial Estate Land At Emr Recycling And Former British Rail Club	WA9 4JA	Bold	PDL	10.19 ha	337	134	203	UC	P/2018/0251
HL417	Sherdley Remec Ltd Gorsey Lane Clock Face	WA9 4SE	Bold	PDL	0.93 ha	18	17	1	UC	P/2015/0582
HL430	Land At Delta Road St Helens	WA9 2EA	Parr	PDL/G	1.34 ha	52	52	0	COMP	P/2014/0797

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Ref	Site Name	Post Code	Ward	Land Type	Size	Site capacity	Units completed	Oustanding capacity	Not started / Under construction / Complete	Planning reference
HL186	Former Pilkingtons Site, City Road	WA10 6PE	Moss Bank	PDL/GF	4.40 ha	153	153	0	COMP	P/2013/0593
HL303	Phase 2a Land Site Of Former Vulcan Works Wargrave Road	WA12 8NR	Newton	PDL	5.20 ha	216	216	0	COMP	P/2012/0290
TH02	Land At Lea Green Colliery And Lowfield Lane Industrial Estate	WA9 5XB	Thatto Heath	PDL	5.25 ha	160	156	4	UC	P/2014/0291
HL202	Former Deacon Trading Estate	WA12 9XD	Earlestown	PDL	9.07ha	321	305	16	UC	P/2009/1016
HL250	Pilkington (Eccleston Works), Millfields	WA10 5NR	Eccleston	PDL	9.50 ha	283	283	0	COMP	P/2011/0694
HL076	Former Lea Green Colliery, Lowfield Lane Industrial Estate	WA9 5BB	Thatto Heath	PDL	10.77 ha	354	354	0	COMP	P/2006/1407
HL555	Viridor Glass Recycling, Lancots Lane	WA9 3GL	Town Centre	PDL	1.76 ha	53	42	11	UC	P/2016/0210
NT03	Land to side and rear of 41-49 Old Wargrave Road	WA12 8NG	Newton	PDL	0.61 ha	60	0	60	NS	Planning permission P/2016/0412 now expired
HL483	Former Ibstock Brickworks, Chester Lane	WA9 4EN	Bold	PDL	9 ha	260	0	260	NS	P/2015/0599
HL557	Land north of Edward Street	WA9 3DP	Town Centre	PDL	1.21 ha	52	52	0	COMP	P/2017/0083
HL526	Former Broad Oak Social Club and land rear of 1-21 Seath Avenue	WA9 1SH	Parr	PDL/GF	0.97 ha	24	24	0	COMP	P/2018/0287
HL525	Fishwicks Industrial Estate, Baxters Lane	WA9 3NA	Town Centre	PDL	2.75 ha	93	0	93	NS	P/2016/0299
HL496	Land at Elton Head Road, Lea Green	WA9 5AU	Thatto Heath	Greenfield	6.2 ha	180	0	180	NS	P/2019/0216
HL531	Land At Mere Grange Lowfield Lane	WA9 5TA	Thatto Heath	Greenfield	3.6 ha	82	15	67	UC	P/2018/0849
HL532	Land At Rear Of 46 Windle Hall Drive	WA10 6QQ	Windle	Greenfield	0.43	9	9	0	COMP	P/2016/0568
HL488	Saxon Court Keswick Road	WA10 2AT	Windle	PDL	0.42	6	6	0	COMP	P/2016/0109

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Ref	Site Name	Post Code	Ward	Land Type	Size	Site capacity	Units completed	Outstanding capacity	Not started / Under construction / Complete	Planning reference
HL289	388 Clipsley Lane	WA11 0ST	Haydock	Greenfield	0.55	5	0	5	NS	P/2019/0817
HL524	Clough Mill Blundells Lane	L35 6ND	Rainhill	PDL	0.51	10	0	10	NS	P/2019/0812
HL527	Land At 305 Walkers Lane Sutton Manor	WA9 4AQ	Bold	PDL/GF	0.5	16	16	0	COMP	P/2016/0422
HL537	Windlehurst Youth Centre Gamble Avenue	WA10 6LJ	Windle	PDL	0.47	12	0	12	NS	P/2016/0650

Post SHLAA 2017 Additional Large Sites with Planning Permission as of 31/03/2020

Ref	Site Name	Post Code	Ward	Land Type	Size	Site capacity	Units completed	Outstanding capacity	Not started / Under construction/ Complete	Planning reference	SHLAA 2017 Ref (if applicable)
HL666	3 Central Avenue Eccleston Park St Helens	L34 2QL	Eccleston	PDL	0.2	13	0	13	UC	P/2018/0802	
HL624	Land At Knowles House Avenue And Millwood Avenue Eccleston	WA10 5BD	Eccleston	PDL	0.25	9	9	0	COMP	P/2018/0065	
HL613	Millbrook Hostel 12 Mulcrow Close St Helens	WA9 1HD	Town Centre	PDL	0.26	16	4	12	UC	P/2017/0395	
HL664	Christ Church Eccleston Parish Hall Chapel Lane Eccleston St Helens	WA10 5DA	Eccleston	PDL	0.38	7	0	7	NS	P/2018/0749	75
HL629	Land Site of Former Lowe House School Crab Street St Helens	WA10 2JN	Town Centre	PDL	0.39	61	0	61	UC	P/2018/0021	156
HL621	Land Site Of Former Caledonia Peugeot Garage Knowsley Road St Helens	WA10 4GW	West Park	PDL	0.60	50	50	0	COMP	P/2017/0936	HL386 combined with 155.
HL595	Land Bounded by Corporation Street Pocket Nook Street And Atlas Street St Helens Merseyside	WA10 1GF	Town Centre	PDL	0.75	130	0	130	UC	P/2017/0634	78
TH03	Land At Former Flats Springfield Road Thatto Heath St Helens	WA10 3RP	Thatto Heath	PDL	0.87	30	0	30	NS	P/2018/0882	10

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Ref	Site Name	Post Code	Ward	Land Type	Size	Site capacity	Units completed	Outstanding capacity	Not started / Under construction/ Complete	Planning reference	SHLAA 2017 Ref (if applicable)
TC45	Holly Bank Street	WA9 1EG	Town Centre	PDL	1.28	66	66	0	COMP	P/2017/0674	21
HL663	Our Lady Mother of God Parish Centre, Fleet Lane, St Helens	WA9 2RN	Parr	PDL	1.33	54	16	38	UC	P/2018/0502	85
HL593	Land At Weymouth Avenue And Portland Way St Helens	WA9 3QY	Parr	GF	1.35	52	36	16	UC	P/2016/0923	3, 4 and 5
HL578	Carmelite Convent 1 Green Lane Eccleston St Helens	WA10 5HH	Eccleston	PDL	1.77	12	9	3	UC	P/2017/0068	
HL594	Former Deacon Trading Estate Earle Street Newton Le Willows St Helens (site extension)	WA12 9NU	Earlestown	PDL	2.09	97	97	0	COMP	P/2018/0029	
HL617	Sidac Sports And Social Club Sportsground Applecorn Close Sutton Leach St Helens	WA9 4XZ	Sutton	GF	3.35	117	117	0	COMP	P/2017/0890	152
HL562	Land To The West Of Common Road Newton Le Willows St Helens	WA12 9JA	Earlestown	GF	4.71	142	97	45	UC	P/2016/0742	90
HL642	Linkway Distribution Park And Adjacent Land Elton Head Road St Helens	WA9 5BW	Thatto Heath	PDL	12.42	352	0	352	NS	P/2018/0060	38
HL688	Land To Rear Of 18 To 46 Broadgate Avenue And 64 To 94 Marshalls Cross Road St Helens	WA9 5AJ	Town Centre	Greenfield	1.48 ha	32	0	32	NS	P/2019/0693	89

Appendix 4: Local Housing Need Assessment

A local housing need assessment is an up-to-date assessment of housing need calculated in accordance with the Government's Standard Method. Government introduced the Standard Method for preparing Housing Needs Assessments with the revision of the National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance (PPG) in May 2018.

The *Housing Need* section of the PPG (Paragraph: 004 Reference ID: 2a-004-20190220) sets out the steps to follow when calculating local housing need. These are set out below.

Step 1 - Setting the baseline

The PPG says:

Set the baseline using national household growth projections (2014-based household projections in England, table 406 unitary authorities and districts in England) for the area of the local authority. Using these projections, calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period).

Number of households in St. Helens 2020	80,208
Number of households in St. Helens 2030	84,320
Household growth in St. Helens 2020-2030	4112
Average annual household growth	411.2

Source: 2014-based live Tables on household projections: Table 406: Household projections by district, England, 1991- 2039

The ONS 2014-based household projections identify 80,208 households for St. Helens in the current year (2020) increasing to 84,320 households over the 10-year period to 2030. This yields an overall increase of 4,112 households over 10 years, equivalent to a projected average annual household growth of **411** households per year.

Step 2 - An adjustment to take account of affordability

The PPG says:

Adjust the average annual projected household growth figure (as calculated in step 1) based on the affordability of the area. The most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used.

The most recent ONS median workplace-based affordability ratio is **4.88** for St. Helens, which is the ratio for the previous calendar year (2019). The adjustment factor can therefore be derived as follows:

Median workplace based affordability ratio for St. Helens		4.88
Adjustment Factor	$((4.88 - 4) / 4) \times 0.25 =$	0.055
Minimum annual local housing figure	$(1 + 0.055) \times 411 =$	434

Source: House price to workplace-based earnings ratio, Table 5c Ratio of median house price to median gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2019

Applying an uplift of 5.5% to the annual household growth of 411 households per year yields an annual housing need of **434** dwellings.

Step 3 - Capping the level of any increase

The PPG says:

Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:

- the projected household growth for the area over the 10 year period identified in step 1 (425.4 for St. Helens); or
- the average annual housing requirement figure set out in the most recently adopted strategic policies (570 for St. Helens).

The higher of these for St. Helens is the housing requirement figure set out in the Core Strategy (570 per year) and a cap at 40% above this figure would be 798 per year. As the local housing need figure is lower than the Core Strategy requirement there is no need to apply a cap. The minimum local housing need figure for St. Helens is therefore **434 units per annum**.

Appendix 5: Updated version of LPSD Table 4.6

Table 5.1: Explanation of Local Plan Submission Draft Table 4.6: Housing land requirements and supply – 2016 until 2035

Requirements	Dwellings	Explanation
a) St. Helens housing requirement (19 years from 1 Apr 2016 to 31 Mar 2035) at average of 486 per year	9,234	486 p.a OAN figure x 19 years.
b) Expected completions by 1 Apr 2020	1,989	2016/17-2017/18 actual completions of 895 dwellings from years 2016/17 and 2017/18 plus 2018/19 and 2019/20 expected SHLAA completions of 1094 dwellings (including windfall allowance of 93pa for 2018/19 and 2019/20).
c) Residual requirement over Local Plan period from 1 Apr 2020 to 31 Mar 2035	7,245	This figure is calculated by subtracting the expected completions by 1 April 2020 (row b) from the overall requirement (row a).
d) Anticipated supply		
e) Total SHLAA supply– 1 Apr 2017 until 31 Mar 2035	7,817	The SHLAA supply figure includes planning permissions, a small sites 'windfall' allowance, allocated sites 3HA, 6HA, 9HA and 10HA, and other sites considered suitable for housing in the SHLAA. It includes the figures for the period up to 2032 in figure 4.3 of the Strategic Housing Land Availability Assessment 2017 and an additional allowance for the years from 2032 to 2035 (135 dwellings at SHLAA site 111/ Local Plan allocation 6HA- Cowley Hill) to cover the full Plan period.
... consisting of:		Breakdown of SHLAA supply
f) Large sites (0.25ha or 5 dwellings and above) - planning permission not started as of 1 Apr 2017	1,581	
g) Large sites with planning permission under construction as of 1 Apr 2017	654	
h) Large sites with planning permission but stalled as of 1 Apr 2017	289	
i) Large sites - identified by 2017 SHLAA, no planning permission as of 1 Apr 2017	4,107	
j) Small sites (below 0.25ha / 5 dwellings) (small sites / "windfall" allowance)	1,395	
k) Estimated SHLAA supply – 1 Apr 2020 until 31 Mar 2035	6,344	Expected SHLAA supply in the Plan period. This figure has been derived by deducting the expected delivery from SHLAA sites between 1 April 2017 and 31 March 2020 (1473 dwellings - see Figure 5.3 in the 2017 SHLAA) from the overall SHLAA supply identified in row e (7,817 dwellings).

Requirements	Dwellings	Explanation
l) SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18)	794	15% reduction to 6-15 years supply identified in figure 4.3 of SHLAA (5161 dwellings) plus 135 dwellings at site 111 (5296 dwellings) for three years beyond the 15 year SHLAA period. 6-18 years refers to the SHLAA time period which covers years 3 to 15 of the Plan.
m) Residual SHLAA capacity over 15 year Plan period (1 Apr 20 - 31 Mar 35)	5,550	Plan period SHLAA supply (6344 dwellings) minus 15% reduction (794 dwellings).
n) Required capacity to be found on Green Belt land	1,695	Amount needed from Green Belt once 15% deduction is made to SHLAA Plan period supply (7245 residual requirement- 5550 SHLAA residual supply).
o) Required capacity of sites with 20% increased allowance for sites to be removed from the Green Belt (site allocations 5HA to 15HA inclusive) (to allow for contingencies e.g., infrastructure provision, delays, lead-in times to start of housing delivery etc.)	2,034	20% increase to required amount from the Green Belt (339 dwellings) to allow for lead in times etc. {Ignore "(site allocations 5HA to 15HA inclusive)" this was a typographical error and will be deleted through the proposed Local Plan Modifications}.
p) Total capacity of allocated sites removed from the Green Belt (sites 1, 2, 4, 5, 7 and 8 HA) (1 Apr 20 - 31 Mar 35)	2,056	Actual capacity of Green Belt allocations in the Plan period. This is 361 dwellings above the amount required to meet the housing requirement. Note that in addition to the 2056 dwellings, the Green Belt allocations are also expected to deliver a further 2679 dwellings beyond the Plan period (2508 of these are expected on Site 4ha Bold Forest Garden Suburb). See SHBLP Table 4.5.
q) Total supply over plan period	7,606	This total supply figure is derived by adding the residual SHLAA capacity (row m) to the dwellings expected to be delivered in the Plan period from the sites to be removed from the Green Belt (row p).

The tables below provide an update to (as of 31.03.2020) and a simplified version of Local Plan Submission Draft Table 4.6: Housing land requirements and supply – 2016 until 2035.

Table 5.2: Residual Housing Land Requirement 2016-2035

Requirement	Dwellings
St. Helens housing requirement (19 years from 1 Apr 2016 to 31 Mar 2035) at average of 486 per year	9,234
Net Completions from 1 April 2016- 31 March 2020	2428
Residual requirement over Local Plan period from 1 April 2020 to 31 March 2035	6806

Table 5.3: SHLAA Housing Land Supply 2020-2035

SHLAA Supply 2020 – 2035 (as of 31.03.2020)	Dwellings
Total SHLAA supply– 1 April 2020 until 31 March 2035 as per the updated housing trajectory in Appendix 1 of this Paper (including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA and 10HA)	4917
SHLAA capacity reduction for non-delivery as per the updated housing trajectory in Appendix 1 (15% of SHLAA identified capacity for years 6-15 of the Plan period including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA and 10HA) (2912 -15%)	-437
Residual SHLAA capacity over 15 year Plan period 1 April 2020 - 31 March 2035 (including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA and 10HA)	4480
Small sites allowance x 15 years (sites below 0.25ha / 5 dwellings)	1395
Total Plan period capacity on non-Green Belt land	5875

Table 5.4: Green Belt Land Supply 2020-2035

Green Belt Land Supply 2020-2035	Dwellings
Required capacity to be found on Green Belt land (6806-5875)	931
20% increased allowance to be added to Green Belt required capacity (to allow for contingencies e.g., infrastructure provision, delays, lead-in times to start of housing delivery etc.)	186
Overall required capacity of sites to be removed from the Green Belt	1117
Total Plan period capacity of allocated sites removed from the Green Belt (sites 1HA, 2HA, 4HA, 5HA, 7HA and 8HA)	1870

Table 5.5: Total Supply over the Plan Period 2020-2035

Total Supply over the Plan Period 2020-2035	Dwellings
Total Plan period capacity on non-Green Belt land	5875
Total Plan period capacity of allocated Green Belt sites	1870
Total housing supply over Plan period	7745

Appendix 6: Analysis of Build Out Rates

Address	Planning Reference	First Completion	Last Completion	Year 10/11	Year 11/12	Year 12/13	Year 13/14	Year 14/15	Year 15/16	Year 16/17	Year 17/18	Year 18/19	Year 19/20	Total Number of Dwellings completed	Average Build Rate per annum
SITES OVER 50 UNITS															
LAND AT DELTA ROAD ST HELENS	P/2014/0797	Sep-16	Sep-18							14	25	12		51	17
LAND SITE OF FORMER 29 EDWARD STREET ST HELENS	P/2017/0083	Dec-17	Dec-18								26	26		52	26
LAND OFF LOWFIELD LANE	P/2012/0405	Mar-19	N/A (still under construction)									15	38	53	27
LAND AT PARK ROAD SOUTH	P/2008/1036	In financial year 08/09	Jan-12	34	26									60	30
ST HELENS COLLEGE NEWTON CAMPUS, CROW LANE EAST	P/2011/1041	Jan-14	Jul-16				11	37	11	1				60	15
LAND AT WARBURTON HEY (PHASE 1)	P/2009/0356	Jul-11	Apr-12		62									62	62
HOLLY BANK STREET	P/2017/0674	Dec-18	Sep-19									26	40	66	33
BOARDMANS LANE	P/2007/1033	In financial year 08/09	Dec-14	8	23	0	13	24						68	14
LEA GREEN FARM (EAST) ELTON HEAD ROAD	P/2006/0584	In financial year 08/09	Sep-14	8	26	13	13	11						71	14
LAND AT CEDAR CRESCENT AND LAUREL AVENUE	P/2011/0599	Dec-12	Jul-14			30	35	7						72	24
LAND SITE OF FORMER CALEDONIA PEUGOT GARAGE KNOWSLEY ROAD ST HELENS	P/2017/0936	Jun-19	Sep-19										72	72	72
OAK TYRE SERVICES LTD CONCEPT HOUSE WARRINGTON ROAD	P/2010/0800	Sep-14	Sep-16					30	25	24				79	26
FORMER ST AELREDS CATHOLIC TECHNOLOGY COLLEGE, BIRLEY STREET	P/2012/0773	Nov-13	Oct-15				32	34	18					84	28
LAND AT NEW STREET	P/2011/0142	Apr-12	Dec-15			24	15	26	20					85	21
POLAR FORD, CITY ROAD	P/2010/0276	Sep-16	Sep-19							18	37	27	4	86	22
BROADWAY COMMUNITY HIGH SCHOOL BROADWAY	P/2015/0154	Dec-15	Jun-16						72	16				88	44
VULCAN VILLAGE (PHASE 3) WARGRAVE ROAD NEWTON LE WILLOWS ST HELENS	P/2016/0604	Sep-18	N/A (still under construction)									37	54	91	46
LAND TO THE WEST OF COMMON ROAD NEWTON LE WILLOWS ST HELENS	P/2016/0742	Jun-18	N/A (still under construction)									52	45	97	49
FORMER DEACON TRADING ESTATE EARLE STREET	P/2018/0029	Sep-18	Jul-19									87	10	97	49

NEWTON LE WILLOWS ST HELENS															
AVERAGE BUILD OUT RATE FOR SITES OVER 50 UNITS															33
SITES OVER 100 UNITS															
SIDAC SPORTS AND SOCIAL CLUB SPORTSGROUND APPLECORN CLOSE SUTTON LEACH ST HELENS	P/2017/0890	Sep-18	Sep-19									90	27	117	59
PENLAKE INDUSTRIAL ESTATE	P/2018/0251	Jun-19	N/A (still under construction)										146	146	146
PHASE 1 LAND SITE OF FORMER VULCAN WORKS WARGRAVE ROAD	P/2010/0003	Jul-11	Mar-17		24	21	19	16	37	36				153	26
FORMER PILKINGTONS SITE, CITY ROAD	P/2013/0593	Jul-14	Jun-17					50	58	35	10			153	38
LAND AT LEA GREEN COLLIERY AND LOWFIELD LANE INDUSTRIAL ESTATE	P/2012/0005	Sep-14	N/A (still under construction)					29	20	0	45	46	22	162	27
ST HELENS RLFC KNOWSLEY ROAD	P/2010/0630	Jul-11	Oct-15		25	26	51	50	15					167	33
AVERAGE BUILD OUT RATE FOR SITES OVER 100 UNITS															55
SITES OVER 200 UNITS															
PHASE 2A LAND SITE OF FORMER VULCAN WORKS WARGRAVE ROAD	P/2012/0290	Jul-13	Jun-18				32	42	54	57	23	7		215	36
FORMER LEA GREEN COLLIERY, LOWFIELD LANE INDUSTRIAL ESTATE,	P/2006/1407	In financial year 07/08	Dec-17	36	43	28	50	42	18	37	8			262	33
PILKINGTON (ECCLESTON WORKS), MILLFIELDS	P/2011/0694	Oct-12	Dec-19			4	17	32	70	51	56	24	21	275	34
DEACON TRADING ESTATE	P/2009/1016	Jul-16	N/A (still under construction)							59	96	93	56	304	76
AVERAGE BUILD OUT RATE FOR SITES OVER 200 UNITS															45
AVERAGE BUILD OUT RATE ALL SITES ABOVE 50 UNITS															43