

ST HELENS BOROUGH LOCAL PLAN 2020—2035 EXAMINATION

Agenda
Session 2 – 09.30 Wednesday 26 May 2021
Matter 2
Housing and Employment Needs and Requirements

This matter explores the timeframe of the LP and whether the amount of housing and employment land proposed in the LP is appropriate to meet the needs of the area up to its end date.

Policies to be covered by Matter 2: LPA02, LPA04, LPA05

Main Evidence Base

SD022 – Employment Land Need and Supply Background Paper
SD025 - Housing Need and Supply Background Paper
SHBC001 – Council response to Inspector’s preliminary questions
HOU001 & HOU003 Strategic Housing Market Area (SHMA) Assessments
EMP001 – EMP003 Employment Land Needs Studies (ELNS)
SHBC007 - Updated employment and housing land supply position statement
SHBC010 - St Helens Local Plan Draft Schedule of Modifications

Examination library link:

<https://www.sthelens.gov.uk/planning-building-control/planning-policy/local-plan/local-plan-examination-library/>

Participants

Please refer to the latest Hearings Programme (INSP009B)

Statements

St Helens Borough Council
Taylor Wimpey UK Ltd
Home Builders Federation
Wainhomes
Steve Muskett
Persimmon Homes NW
Eccleston Homes
Homes England
Jones Homes (NW) Ltd
Redrow Homes NW & Wallace Land Investments
Barratt Homes
Andrew Cotton
Omega St Helens Ltd

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Lovell Partnership Ltd
Bericote Properties
Miller Homes
Parkside Regeneration LLP
Peel L & P
Murphy Group
Story Homes
CPRE
St Helens Green Belt Association

Introduction to the hearing session

Issue 1: The Local Plan timeframe

The Framework requires that strategic policies should look ahead over a minimum 15-year period from adoption. The submitted plan has an end date of 2035. Adoption is not likely until late 2021 at the earliest and so a 15-year period from adoption would not be achieved.

In response to the Inspectors preliminary questions, the Council has agreed that a MM could be proposed to extend the Plan period to 2037.¹ *Are there any comments on the alternative end dates of 2035 (submission) and 2037 (possible MM)?*

The Council has also considered the implications of extending the plan period to 2037. The housing requirement would be increased by 972 units and the employment land requirement by 15 ha. The Council considers that the increase would be met by identified housing and employment land supply and allocated sites which would still be under construction in 2035 (See SHBC001 – PQ25).

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

The Council has updated the residual requirement as at 31 March 2021 (SHBC007) (see also Matters 5 and 6 - Housing and employment land supply).

The Plan includes within its title 2020-2035 (front cover), Policy LPA02 has a Plan period of 1 April 2020 to 31 March 2035 and the Glossary refers to the same period. However, the base dates for the employment land and housing requirements are different. Policy LPA04 (employment) and its explanation refer to a base-dates of both 2012 and 2018, whereas Policy LPA05 (housing) refers to a base date of 1 April 2016.

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In response to the Inspectors' preliminary questions and suggestion that the base date should be 1 April 2016, the Council acknowledged the different base dates but considered that a base date of 2016 would have significant implications for the employment land requirement as set out in SHBC001 (PQ28).

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

The Council indicates that an employment land base date of 2016 would not take into account under-provision of employment land between 2012 and 2016, when there was clearly demand.

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

The Council sets out the implications of the different base dates of 2012 and 2016 in its statement (residual employment land requirements of 175 ha and 153 ha respectively).

Issue 2: Housing Need and Requirement

Policy LPA05 indicates that a minimum of 9,234 net additional dwellings (486 dwellings per annum (dpa)) will be provided between 2016 and 2035. If the Plan period was extended to 2037 the requirement would increase to 10,206 dwellings.

The Council's Housing Need and Supply Background Paper indicates that the local housing need assessment informed by the standard method set out in Planning Practice Guidance (PPG) would result in a figure of 434 dpa. However, PPG indicates that in some circumstances it may be appropriate to apply an uplift to the standard-method local housing need (LHN) figure to arrive at the full level of housing need. Some of the circumstances are set out in paragraph 010 of PPG. The Council refer, in particular, to the planned employment levels as a justification for the housing requirement being in excess of the starting point (see SHBC001 – PQ29).

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

5a. Do the pandemic and Brexit have any implications for the housing requirement, noting that the SHMA update was produced in January 2019?

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The Council refers to support through the ELNS and SHMA and its response in SHBC001 (PQ29).

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

Particular issues raised in representations and statements are:

6a. The implications of jobs growth, the LCR Growth Strategy and Liverpool Freeport.

6b. The need to provide homes for the growing work force. A specific example is that some of the jobs at Omega South (EA1) would be taken up by St Helens residents.

6c. The increase in the standard method figure for Liverpool City.

6d. Demographic trends and market signals, including affordability.

6e. Any backlog in unmet needs derived from the Core Strategy requirement.

6f. Delivery of sufficient affordable homes to meet needs, including dealing with any under-provision since 2016.

6g. Recent housing delivery well above 486 dpa.

6h. The effect of demolitions on the requirement.

The Council refers to the balance to be struck between Green Belt protection and providing sufficient homes. It is also noted that the requirement is higher than the LHN figure. To support its position the Council refers to SD025, the ELNS and SHMA. It is also pointed out that affordable housing provision has exceeded need in the last few years.

7. Is the change in the housing requirement during the Plan preparation process justified?¹

The Council refers to the changing context during the preparation process. Further explanation is provided in SD025 (paras 3.45-3.48).

Issue 3: Employment Need and Requirement

The Plan identifies a need to deliver a minimum of 219.2 ha of employment land between 2018 and 2035 (Policy LPA04). This would increase to 235 ha if the end date of the Plan is extended to 2037. These figures are assuming a base date of 2012 for the employment requirement. If the base date was 2016 and the end date of the Plan 2037 the requirement would be 215.8 ha (see SHBC001 – PQ29).

¹ These are summarised at pages 19-20 of the Housing Need and Supply Background Paper. For example, the Preferred Options version of the Plan (December 2016) included a housing requirement of 570 dpa which reflected the figure in the Core Strategy (October 2012).

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

8a. Do the pandemic and Brexit have any implications for the employment land requirement, noting that the ELNS Addendum was produced in January 2019?

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

The evidence shows that past take up was low between 2012 and 2017. The Council consider this was primarily because of inadequate supply of sites attractive to the market (see SHBC – PQ31).

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

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

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

More recent evidence post 2018 has shown an upturn in the take up of employment land.

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

The employment land requirement historic take-up methodology used to calculate the OAN has a base date of 2012. This is because the evidence suggests that take-up rates since then have been low.

14. Is this approach justified?

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

The Council have indicated that changing the baseline date for the employment requirement from 2012 to 2016 (in order to align with the base date used for other evidence base documents that support the Plan) would result in a reduction of the OAN requirement of 23.2 ha (equivalent to 4 years of the requirement) (or 11.6 ha if the Plan period is extended to 2037, equivalent to 2 years of the requirement).

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

17. How would these implications be addressed?

The Council have also indicated that changing the baseline date to 2016 would affect the residual employment land requirement. It would be reduced by 75.11 ha (63.51 ha if the Plan period were extended). This is because there has been significant take up during 2018-2020 at several proposed allocation sites (2EA, 3EA and 10EA). If the completed allocations were discounted (and 1EA which is allocated the meet Warrington's need), the remaining allocations would equate to 182.52 ha. The Council calculate that this would mean that the total allocations would be 26.83 ha over the requirement.

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

19. How would these implications be addressed?

The ELNS Addendum assumes that a large proportion of the need for employment land will derive from the logistics sector (between 110 and 155 hectares). More recent data on take up shows large-scale warehousing is being developed in Haydock (Florida Farm and Penny Lane). There are also several pending planning applications (Parkside, Haydock Point, Omega West).

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

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

An additional 55-65 hectares of employment land has been added to the baseline demand to support additional need deriving from major projects and demand from the logistics sector.

22. Is this justified and consistent with national policy?

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

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

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A 5-year flexibility buffer has also been included amounting to 29 ha.

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

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

Warrington Borough Council indicate in the SOCG (SD012) a need for 362 ha of employment land. However, that need has not been tested through an examination. The Warrington LP will not be submitted for examination until later in 2021 at the earliest.

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

Site EA1 has been specifically identified to meet the employment land needs of Warrington Borough Council.

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

Issue 4: Alignment between housing and employment requirements

SHBC001 (PQ43) summarises the Council's position in relation to the alignment between housing and employment requirements.

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

29a. Are there any implications for the alignment between housing and employment land requirements from Omega South (EA1)?

The Council points to supporting evidence in the ELNS and SHBC001 (PQ43). In relation to the difference base dates, it is pointed out that very little employment land was delivered between 2012-2016 (2.37 ha) and therefore the vast majority of the employment need is to be delivered post 2016, particularly on adoption of the Local Plan, once land supply constraints are addressed.

Actions arising from the hearing session