

## **Kirkwells on behalf of St Helens Green Belt Association**

### **Response to Matters, Issues and Questions for the Examination and Hearing Sessions (INSP007)**

This note sets out St Helens Green Belt Association (SHGBA) response to the examiners' Matters, Issues and Questions for the Examination and Hearing Sessions (INSP007). Each response is set out under the appropriate matter and examiners' question. Only where a response is considered necessary is a comment made. For other relevant questions SHGBA relies on previous submissions to the St Helens Local Plan.

#### **Matter 2 Housing and Employment Needs and Requirements**

*1. Are there any comments on the alternative end dates of 2035 (submission) and 2037 (possible MM)?*

SHGBA support the proposed MM end date of 2037.

*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 housing requirement should use the Standard Method (SM) of 434 dwellings per annum (paragraph 3.11, SD025). The uplift provided by scenario 2, Option 3 of the Employment Land Needs Study to 486 dwellings per annum remains marginal at best (paragraph 3.27 *op. cit.*) and, of itself, is not an exceptional circumstance to move away from the lower SM figure.

We submit as an Appendix to this note a revised report from Piers Elias, independent demographer, this demonstrates that on an evidential basis there is considerable doubt as to the efficacy of the SM figures themselves, if more recent data is employed in the SM a much lower figure of 330 dwellings per annum results.

There is, therefore, no evidential basis for an uplift in the SM.

The employment land requirement should be revised with a base date of 1<sup>st</sup> April 2016, as set out in our previous submission, and subsequent revision to take account of the 2037 end date. There is no need to take account of any perceived shortfall in uptake of employment land 2012 to 2016.

We strongly disagree with the Council's interpretation of paragraph 60 of NPPF that "exceptional circumstances" only have to be demonstrated if seeking to use a lower figure than the SM. Indeed based on Mr Elias' figures there are no exceptional circumstances to justify an alternative approach which supports an uplift in the SM, based on the evidence in his report "current and future demographic trends and market signals" (NPPF, paragraph 60) are downward.

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

No. We have commented on this previously and note the Council's continued reliance on excluding data for the period 2012-2016 that does not support their argument or suit their needs. Over any period of time, a data set includes upward and downward fluctuations. These even out, providing a reflection of long term trends over time. Applying this logic, it could be argued that the recent improved performance in terms of housing delivery (2018-2020) should be excluded from consideration.

*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?*

No. If anything it would enable a clearer link to be drawn between housing and employment growth. It would also provide more comfort that the OAN for employment is based on long term trends and does not exclude data unfavourable to the Council's argument.

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

No. See our previous submission and the Appendix containing the updated work of Mr Elias. Nor have the Council demonstrated exceptional circumstances, indeed, based on SHBC001, page 21, they are of the view they do not have demonstrate "exceptional circumstances".

*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?*

No. See our previous submission and the Appendix containing the updated work of Mr Elias.

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

The housing requirement should be evidence based and reflect the latest available information, subject to the provisions of national planning policy and the SM.

A revision of the requirement using these principles, up or down, is justified. In the case of St Helens there is no justification for a figure above the SM.

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

No. The Council are seeking to use the data most favourable to their case. As stated by them in SHBC001 "there is a risk that the inclusion of post-2012 take-up rates in a historic take-up methodology would distort the historic baseline for predicting needs." (page 21 shbc001). If a methodology using, in part, historic take-up data is to be used it must include the up and down fluctuations in that time series, not just the figures that suit the Council's needs.

*Michael Wellock, Kirkwells, May 2021.*