

# ST HELENS BOROUGH LOCAL PLAN 2020—2035 EXAMINATION

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**Agenda**  
**Session 7 – 09.30 Tuesday 15 June 2021**  
**Matter 5**  
**Housing Land Supply**

This matter considers how the housing requirement will be met; whether those means of meeting the requirement have been justified and will be effective; and whether the LP will have a 5-year housing land supply (HLS) on adoption of the LP.

**Policies to be covered by Matter 5: LPA05, LPA05.1**

**Main Evidence Base**

SD025 - Housing Need and Supply Background Paper

HOU002 - St Helens Strategic Housing Land Availability Assessment (SHLAA)

SHBC001 – Council response to Inspector’s preliminary questions

SHBC004 - Further evidence on Housing Supply, including updated SHLAA Site Assessments

SHBC005 – Council’s response to Inspectors' Preliminary questions on Site Allocations and Safeguarded Land

SHBC007 – Updated Employment and Housing Land Supply Position 31.03.21

SHBC010 – St Helens Local Plan Draft Schedule of Modifications

SHBC011 – Spatial Distribution of Housing Land Supply

**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 (INSP009C)

**Statements**

St Helens Borough Council

Andrew Cotton

Barratt Homes

CPRE

Eccleston Homes

Home Builders Federation

Jones Homes (NW)

# ST HELENS BOROUGH LOCAL PLAN 2020—2035 EXAMINATION

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Lovell Partnerships Ltd  
Miller Homes  
Mr A Jones  
Murphy Group  
Peel L&P  
Persimmon Homes  
Redrow Homes (NW) & Wallace Land Investments  
Steve Muskett  
Story Homes  
Taylor Wimpey  
Wainhomes (NW) Ltd

## **Introduction to the hearing session**

**Main Modifications (MMs) relevant to the session** – MM007, MM008, MM009, Annex 3, Annex 4 (SHBC010)

In response to preliminary questions the Council indicates as follows:

- Tables 4.6 and 4.7 and Figure 4.3 of the Plan (housing land requirements and supply and housing trajectory) have been/will be updated to reflect the tables and trajectory in SHBC007 (the position at 31 March 2021 and an extended Plan period up to 2037) (See Annex 3 to SHBC010).
- SHBC007 also includes a more detailed trajectory showing how allocations and other major sites (including commitments and SHLAA sites) will deliver for each year over the Plan period.
- The above takes into account updated SHLAA site assessments (SHBC004).
- The Table at Appendix 2 of SHBC007 and Annex 4 to SHBC010 shows the key assumptions and parameters that will be relied on to calculate the 5-year HLS (5% buffer and the Sedgefield<sup>1</sup> approach to dealing with shortfalls). This should be added to the reasoned justification to Policy LPA05 (MM).

## **Issues**

### **Issue 1: Components of Housing Supply**

- 1. Having regard to the Council's responses referred to above, will the up to date housing supply position be clearly shown in the Plan (base date of 31 March 2021)?*

*The Council proposes including the updated tables at Annexes 3 and*

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<sup>1</sup> Dealing with the shortfall in the next 5 years

# ST HELENS BOROUGH LOCAL PLAN 2020—2035 EXAMINATION

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*4 to SHBC010 in the Plan.*

- 2. Having regard to Council's responses referred to above, will the components of the housing supply that will meet the housing requirement be clearly shown in the Plan?*

*See above and proposed revised trajectory (Table 4.7 and Figure 4.3) taken from SHBC007.*

- 3. Is the small sites allowance of 93 dpa justified by compelling evidence (see paras 4.10 to 4.13 of SD025)?*

*3a. Is there any information about small site completions in 2020/21?*

*3b. Is there any evidence of double-counting?*

- 4. Should the supply shown within the Plan make an allowance for demolitions or are they accounted for within the net number of homes anticipated to be delivered from each site?*

- 5. Should empty homes be included as a component of supply?*

- 6. Does the Plan show sufficient flexibility in the supply to ensure that the housing requirement will be met over the Plan period (the Council's latest figures show a residual requirement of 7778 units and potential housing supply of 8384 units assuming a Plan period until 2037<sup>2</sup>)?*

*The Council's latest figures show a residual housing land requirement of 7132 (1 April 2021 to 31 March 2027) compared to a total land supply of 7831 for the same period. The Council also point to the contingency allowances being built into the SHLAA sites (15%) and Green Belt sites (20%).*

- 7. Is the flexibility in housing supply provided by the Green Belt sites justified?*
- 8. Would greater certainty be provided within the Plan if SHLAA sites (or the larger sites) were to be allocated (see SHBC001 – PQ52)?*

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<sup>2</sup> SHBC001 - PQ25

# ST HELENS BOROUGH LOCAL PLAN 2020—2035 EXAMINATION

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## **Issue 2: The Housing Trajectory**

9. *Is the evidence that supports the Housing Trajectory (Table 4.7 and Figure 4.3 as amended by Appendix 1 to SD025 and more recently SHBC007) based on realistic assumptions?*

10. *In particular:*

a. *Should a lapse rate be applied to sites expected to deliver in the next 5 years as well as those delivering later in the Plan period (see SHBC001 – PQ50)?*

*The Council refers to the number of sites with planning permission and/or under-construction that are included within the 5 year supply.*

b. *Is the evidence about the delivery of SHLAA sites contained within the SHLAA together with SD025 and SHBC004 robust?*

*The Council notes that the updating of SHLAA proformas in SHBC004 enabled the re-evaluation of delivery timescales.*

*Are there any factual issues raised in representors statements that would lead to a change in the delivery assumptions for SHLAA sites or sites not being included in the trajectory at all?*

c. *Is the evidence about delivery from stalled sites robust (see SHBC001 – PQ53)?*

d. *Are the assumptions about delivery from allocations robust (discussed under Matter 4)?*

e. *Are lead in times and build out rates realistic?*

f. *Is the significant spike in delivery shown in the trajectory between 2025/26 and 2026/27 realistic and supported by evidence (see SHBC001 – PQ54)?<sup>3</sup>*

## **Issue 3: Five Year Housing Land Supply**

The five-year housing requirement is based on the annual requirement of 486 dpa x 5 with a 5% buffer applied. There has not been any shortfall in

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<sup>3</sup> The latest trajectory shows the spike in 2027/28

# ST HELENS BOROUGH LOCAL PLAN 2020—2035 EXAMINATION

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provision since the start of the Plan period (2016). Supply is made up of large sites under-construction and those with planning permission, some SHLAA sites, delivery from some LP allocations and a small sites allowance. Appendix 2 to SD025 shows a supply of 5 years.

*11. Is the use of a 5% buffer to calculate the housing land supply position appropriate?*

*It is assumed that the Council does not wish to demonstrate a 5-year supply of deliverable sites through this LP (in which case a 10% buffer would be required).*

*12. Is the inclusion of 465 units from small sites in the 5-year supply justified?*

*13. Generally, are the assumptions about the delivery from commitments, SHLAA sites and allocations within the 5-year supply realistic?*

*14. Are lead in times and build out rates within the 5-year supply realistic?*

*15. Are there any measures that the Council can take to provide more elbow room in terms of the 5-year supply?*

*The Council's latest calculations show a 5-year supply of 4.6 years. SHBC001 – PQ55 refers to the possibility of a stepped housing requirement and/or increasing the small sites allowance. These options are referred to again in its Matter 5 statement.*

*15a. Should over-supply of housing completions since the base date of the Plan be included in calculations of the residual requirement (and 5-year supply)?<sup>4</sup>*

*15b. Can some of the Green Belt allocations reasonably be expected to commence delivery in the next 5 years or deliver more homes?*

*16. Will there be a five-year supply of deliverable housing sites on adoption of the LP?*

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<sup>4</sup> See PPG Paragraph: 032 Reference ID: 68-032-20190722

# ST HELENS BOROUGH LOCAL PLAN 2020—2035 EXAMINATION

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*As noted above Annex 4 to SHBC010 shows 4.6 years housing land supply at 31 March 2021.*

## **Issue 4: The wording of Policy LPA05**

*17. Will Policy LPA05 as worded be effective in maintaining delivery through the Plan period?*

*17a. Does Section 4 of Policy LPA05 need to be more specific as to when an update of the Plan will be required?*

## **Actions arising from the hearing session**