



NEXUS  
PLANNING

# St Helens Local Plan Examination

## Matter 2: Housing and Employment

On behalf of Eccleston Homes

May 2021

## Introduction

This Hearing Statement is submitted on behalf of Eccleston Homes in relation to Matter 2, Housing and Employment Objectively Assessed Needs (OAN) and Requirements of the St Helens Local Plan Examination.

This statement follows on from Nexus's Planning representations to the Submission Draft consultation in March 2019 (Document Ref. RO1957).

## Issue 1: The Local Plan Timeframe

- 1. Are there any comments on the alternative end dates of 2035 (submission) and 2037 (possible MM)?**
- 1.1 We support the principal of the proposed MM to extend the plan period. However, as set out in detail within our representations (RO1957) and responses to Matter 2, Issue 2 below, the proposed housing requirement within the Plan fails to adequately respond to circumstances that justify an uplift from the Standard Method LHN minimum. These being namely the need to:
  - (a) Continue to stabilise and increase the borough working age population, which is a key part of the Local Plan spatial vision and a Key Strategic Aim.
  - (b) Allow for more housing choice and competition.
  - (c) Support planned economic growth and regeneration.
  - (d) Reflect the higher levels of housebuilding achieved before and after the 2008-2009 recession and previous assessments of housing need.
- 1.2 As set out in detail within our response to Matter 2, Issue 2, we conclude that the most appropriate minimum housing requirement for St. Helens over the period covered by the LP is 547 dpa. This figure being the Standard Method LHN minimum figure (434 dpa) with a 20% uplift (87 dpa) adjustment to address issues (a) to (d) above, and a further 26 dpa demolitions adjustment.
- 1.3 To deliver this higher minimum housing figure and extend the Plan period, additional housing land will be required to be identified and allocated.

## Issue 2: Housing Need and Requirement

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

- 5.1 Yes, circumstances demonstrably exist which justify an uplift on the LHN figure. However, as set out in detail within our representations (RO1957) and summarised below, we do not consider the uplift applied is adequate and therefore consequentially fails to be justified or effective (NPPF, paragraph 35 (b) and (c)).
- 5.2 The Local Plan was submitted to the Secretary of State in October 2020 and the Council's response to PQ26 confirms that the base year for the Standard Method LHN is 2020. In view of this, and in accordance with the National Planning Practice Guidance (PPG), the minimum Standard Method LHN for St Helens is 434 dpa. The Local Plan contains a housing requirement of 486 dpa which equates to a 12% uplift from the Standard Method LHN minimum.
- 5.3 The NPPF (paragraph 60) is clear that the Standard Method LHN determines the minimum number of homes needed. It is widely acknowledged that in order to deliver the Government's objective of delivering at least 300,000 new homes per annum that across England as a whole, the minimum LHN figures need to be exceeded.
- 5.4 Furthermore, the National Planning Practice Guidance (PPG) contains a dedicated section on circumstances when it might be appropriate to plan for a higher housing need figure than the Standard Method indicates (ID: 2a-010-20201216).
- 5.5 The Council's response to PQ29 outlines that the Standard Method figure was uplifted in order to meet the Borough's economic potential. The principal of this is accepted and supported.
- 5.6 However, the Council then cites PPG ID: 2a-15-20192020 and concludes that the housing requirement of 486 dpa is in excess of the starting point and the approach in St Helens can therefore be considered sound. The Council's position appears to be, if the Standard Method LHN figure is exceeded by even a single dwelling then the approach taken and therefore housing requirement is automatically sound. This position is not accepted.
- 5.7 As highlighted within the PPG ID: 2a-15 extract below, the Council's position on this matter omits consideration of a key part of the PPG, where it is made clear that the approach taken should adequately reflect current and future demographic trends and market signals:

*"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that 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."*

- 5.8 PPG ID: 010 is clear that the Standard Method LHN minimum starting point does not attempt to predict the impact of future government policies, changing economic circumstances or other factors might have on demographic behaviour. The PPG outlines that circumstances where this may be appropriate include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of:
- Growth strategies for the area.
  - Strategic infrastructure improvements.
  - Unmet housing need from neighbouring authorities.
  - Previous levels of housing delivery in an area.
  - Previous assessments of need.
- 5.9 In respect of the above, the PPG confirms that circumstances such as these need to be taken into account when considering whether it is appropriate to plan for a higher level of need than the Standard Method minimum.
- 5.10 Although the Council has correctly recognised that the Standard Method LHN figure is too low and circumstances exist, such as supporting planned economic growth and the need to address the long term trend of declining affordability (SD001 paragraph 4.18.5), the approach taken by the Council to determine the uplift has failed to adequately consider and take into account all of the relevant circumstances and factors. The approach therefore fails to be effective or justified (NPPF, paragraph 35 (b) and (c)). As set out in detail within our representations (RO1957) our principal concerns relate to:
- (a) Failure to achieve sustainable and balanced population growth (a key issue the Local Plan seeks to address as it is part of the overarching spatial vision and Key Strategic Aim 1). Please refer to paragraphs 2.5 to 2.10 of our representations (RO1957) for further detail.
  - (b) A housing figure of 486 dpa is significantly lower than previous levels of assessed, planned and delivered housing. Please refer to paragraphs 2.11 to 2.18 of our representations (RO1957) for further detail. However, specifically regarding housing delivery levels, it is noted that since our representations were submitted the Council's latest monitoring data confirms net completions of 775 dwellings in 2018/19 and 758 dwellings in 2019/20. Housing delivery levels again meaningfully higher than the proposed Local Plan figure which is intended to 'significantly boost the delivery of housing' within St Helens.
  - (c) Associated with housing delivery and previous assessments of housing need, the Council previously concluded that a further 29 dpa is required to be added to the objectively assessed housing figure in order to ensure the required number of net additional homes were achieved. The additional 29 dpa reflected the Council's monitoring evidence that the Borough has a longstanding annual average trend of a loss of 26 dpa through demolitions and changes of use. This adjustment, underpinned by the Council's own monitoring evidence, has

not been carried forward into the submission Local Plan. Please refer to paragraphs 2.19 to 2.22 of our representations (RO1957) for further detail on this issue.

- (d) The job-led uplift to the Standard Method LHN is too low to support planned economic growth over the Local Plan period as the job-led scenario undermining the housing requirement:
- (i) Fails to take into consideration the level of projected job growth from none B Class uses. Please refer to paragraphs 2.25 to 2.30 of our representations (RO1957) for further detail.
  - (ii) Unjustifiably discounts employment site potential over the Plan period (namely Site EA1: Omega South Extension and Site EA4: Land North East of Junction 23 M6, Haydock). Please refer to paragraphs 2.31 to 2.35 of our representations (RO1957) for further detail.
  - (iii) Fails to take into consideration potential job growth associated with the now confirmed Liverpool City Region Freeport which could create c. 14,000 jobs. Although the Chancellor confirmed the eight Freeport locations as part of the March 2021 Budget the Liverpool City Region authorities had submitted a bid to the Government ahead of the Local Plan being finalised and submitted to the Secretary of State. Indeed in December 2020 the Leader of St. Helens Borough Council, Cllr David Baines, stated '*we're working closely with City Region partners on this and other opportunities and will continue to do all we can to bring growth, jobs and prosperity to our borough*'.

5.11 Given the above, and as set out within our representations (RO1957), we conclude that the most appropriate housing requirement for St. Helens over the period covered by the LP (2020 to 2037) is 547 dpa. This figure being the Standard Method LHN minimum figure (434 dpa) with a 20% uplift (87 dpa) adjustment and a further 26 dpa demolitions adjustment. A housing figure of 547 would:

- (a) Continue to stabilise and increase the borough working age population, which is a key part of the Local Plan spatial vision and a Key Strategic Aim.
- (b) Allow for more housing choice and competition.
- (c) Support planned economic growth and regeneration.
- (d) Reflect the higher levels of housebuilding achieved before and after the 2008-2009 recession and previous assessments of housing need.

**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?**

6.1. Yes.

6.2. Please refer to our response to Matter 2, Q5 above.

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

7.1 It is accepted that during the course of plan preparation, data sets, assessment methodologies and other factors, such as economic cycles, which inform the housing requirement can change. However, as outlined within our representations (RO1957) and response to Matter 2, Q5 above, the approach and changes made by the Council to the housing requirement have not been positively prepared, nor are they justified or effective (NPPF, paragraph 35 (a) – (c)). The approach also fails to be consistent with national policy and guidance (NPPF, paragraph 35 (d)), namely PPG: Housing and Economic Needs Assessment guidance, particularly ID: 2a-10 and ID: 2a-15.

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