



Barratt Homes (RO1944)

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# ST HELENS LOCAL PLAN EXAMINATION

Matter 2 – Housing and Employment Needs and  
Requirements





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**TYPE OF DOCUMENT (VERSION) PUBLIC**

**PROJECT NO. 62260761**

**DATE: MAY 2021**



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## **ST HELENS LOCAL PLAN EXAMINATION**

Matter 2 – Housing and Employment Needs and Requirements

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# QUALITY CONTROL

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| Issue/revision | First issue   | Revision 1  | Revision 2 | Revision 3 |
|----------------|---|---|------------|------------|
| Remarks        | First draft   | Final   |            |            |
| Date           | 05/05/2021  | 07/05/2021  |            |            |
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| Signature      |  |  |            |            |
| Project number | 62260761  | 62260761  |            |            |
| Report number  | Matter 2  | Matter 2  |            |            |
| File reference | 21450001  | 21450001  |            |            |



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# INTRODUCTION



# 1 INTRODUCTION

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- 1.1.1. This Hearing Statement is submitted on behalf of Barratt Homes (“Barratt”) (Respondent ID: RO1944) in respect of the St.Helens Borough Local Plan 2020-2035 (“the Plan”) Examination.
- 1.1.2. It has been prepared by WSP in relation to Matter 2 (Housing and Employment Needs and Requirements), specifically in relation to:
- Issue 1 (The Local Plan timeframe) – Questions 1 and 2; and
  - Issue 2 (Housing Need and Requirement) – Questions 5, 6 and 7.
- 1.1.3. As you will be aware, Barratt controls the site at Florida Farm South in Haydock, which is proposed to be allocated for residential development by Policy LPA05 (ref: 2HA)

## SUMMARY

- 1.1.4. In summary, our answers to the Inspectors’ Matters, Issues and Questions (“MIQs”) conclude that:
- Question 1 – the Local Plan timeframe should be extended to 2037;
  - Question 2 – an extension to the Local Plan timeframe would equate to an uplift in the housing requirement;
  - Question 5 – there are other circumstances which support an uplift above the LHN figure (including an unmet shortfall in housing delivery) that have not been factored in;
  - Question 6 – the housing requirement should be further increased; and
  - Question 7 – the reduction in the housing requirement is not justified.
- 1.1.5. To aid the Inspectors, we have cross-referenced our answers to the ‘tests of soundness’ and have suggested modifications (where necessary) to make the Plan ‘sound’.
- 1.1.6. We look forward to elaborating further on our Statement and representations with the Inspectors at the hearing session on Wednesday 26 May 2021.

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**QUESTIONS**



## 2 QUESTIONS

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### 2.1 ISSUE 1: THE LOCAL PLAN TIMEFRAME

#### QUESTION 1

*Q1. Are there any comments on the alternative end dates of 2035 (submission) and 2037 (possible MM)?*

- 2.1.1. In our view, the Plan's timeframe should be extended to 2037, to be **positively prepared** and **consistent with national policy**.
- 2.1.2. Paragraph 22 of the National Planning Policy Framework ("NPPF") requires strategic policies to look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.
- 2.1.3. Paragraph 064 (Reference ID: 61-064-20190315) of the 'Plan-making' section of Planning Practice Guidance ("PPG") reiterates that strategic policies should be prepared over a minimum 15-year period and that a local planning authority ("LPA") should be planning for the full plan period.
- 2.1.4. The requirement for a 15-year plan period was highlighted to the Council in our representations to the Local Plan Scoping Consultation stage in March 2016.
- 2.1.5. Assuming that adoption can be achieved by the end of 2021/22 (which would be 'year zero'), then clearly the Plan's end date of 2035 as submitted would not be sufficient as it would only provide a 13-year timeframe. Instead, rolling forward a 15-year period from 2021/22 would equate to an end date of 2036/37 (i.e. 'year 15'), which would pass the 'tests of soundness'.
- 2.1.6. Barratt agrees that this amendment could be dealt with through a main modification ("MM").

#### QUESTION 2

*Q2. 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?*

- 2.1.7. In our view, the extension of the Local Plan timeframe to 2037 would equate to an additional two years needing to be added to the overall housing requirement, to be **positively prepared, effective** and **consistent with national policy**.
- 2.1.8. Paragraph 11, 35 and 65 of the NPPF require LPAs to meet their objectively assessed needs over the plan period.
- 2.1.9. If the Inspectors find the proposed housing requirement of 486 dwellings per annum ("dpa") 'sound' (which we dispute), then in principle this would equate to an increase in the housing requirement by 972 dwellings (i.e. 486 dpa x two years), as set out in the Council's Response to the Inspectors' Preliminary Matters, Issues and Initial Questions ("PQs") (January) [SHBC001].
- 2.1.10. Whichever housing requirement is found 'sound', additional housing land supply will be required to meet the uplifted requirement, as correctly acknowledged by the Council.
- 2.1.11. Notwithstanding that Barratt disputes the Council's conclusions on the housing trajectory (which we set out in our hearing statements in respect of Matters 4 and 5), we agree that sites like Florida Farm South (ref: 2HA) will, at the Council's forecasted delivery rates at least, witness more homes

being built out within the plan period (as opposed to beyond the plan period) in light of the increased requirement. However, it is acknowledged that this may have implications on safeguarded land that is required beyond the plan period.

- 2.1.12. Barratt recommends that any consequential amendments to the Plan to accommodate an increased requirement and therefore supply (for example in Policies LPA05 and LPA06) would need to be dealt with through MMs.

## 2.2 ISSUE 2: HOUSING NEED AND REQUIREMENT

### QUESTION 5

*Q5. Do the circumstances, particularly relating to economic growth, support the requirement for housing of 486 dpa as an uplift on the LHN figure?*

- 2.2.1. In principle, there are legitimate circumstances which support an uplift above the local housing need (“LHN”) figure of 434 dpa (which we understand was derived from the ‘standard method’, according to Appendix 4 of the Council’s Housing Need and Supply Background Paper [SD025]). However, in our view, the proposed housing requirement figure of 486 dpa is not sufficiently high enough to take account of all circumstances, to be **positively prepared, justified** and **consistent with national policy**.
- 2.2.2. PPG paragraph 010 of the ‘Housing and economic needs assessment’ section (Reference ID: 2a-010-20201216) acknowledges that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.
- 2.2.3. We explore the circumstances relating to economic growth aspirations, choice and competition in the housing market and affordable housing need in our response to Question 6 below. However, in our review of the Plan and its supporting evidence base, we have also become aware that there is another circumstance that has not been accounted for. There is a historic backlog of unmet housing need from the adopted Core Strategy (October 2012) [LOC001] which is not being addressed by the Plan, which proposes to ‘wipe clean’ the shortfall.
- 2.2.4. At paragraph 3.29 of SD025, the Council states that *“While the standard method is not being used, the higher number derived from economic led need would also by extension address any historic backlog”*. However, PPG paragraph 011 explains that where an alternative approach to the standard method is used, past under delivery should be taken into account.
- 2.2.5. The Plan’s proposed start date is 2016 (or 2016/17 when expressed in monitoring years). With reference to the historic housing delivery rates provided in Table 4.1 of SD025, we understand that there was a cumulative shortfall of 1,241 dwellings in 2015/16 (which upon adoption of the Plan would be the end date of the previous plan) against the Core Strategy housing requirement of 570 dpa. These 1,241 dwellings ought to be added to the Plan’s housing requirement.
- 2.2.6. However, the uplift (which is only 52 dpa above the LHN) is not sufficiently high enough to address the shortfall (15 x 52 dpa = 780 dwellings), let alone the other demonstrable circumstances that point towards a higher housing requirement figure. By our calculations, there are still 461 dwellings (i.e. 1,241 - 780) of unmet need from the previous Core Strategy plan period that need to be met, and this is even before economic growth and other circumstances are factored in. In our view, it is not a sound approach to ‘double count’ the uplift towards addressing economic growth and a shortfall in housing delivery.

- 2.2.7. Barratt recommends that any consequential amendments to the Plan to accommodate an increased requirement would need to be dealt with through MMs.

## QUESTION 6

*Q6. 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?*

- 2.2.8. Yes, in our view, the housing requirement should be further increased above the current envisaged housing requirement of 486 dpa, to be **positively prepared, justified** and **consistent with national policy**.
- 2.2.9. PPG paragraph 010 (Reference ID: 2a-010-20201216) acknowledges that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.
- 2.2.10. Whilst the proposed requirement of 486 dpa may be nominally higher than the LHN of 434 dpa (by 52 dpa), in our view it is not sufficiently high enough to be considered sound in the context of NPPF paragraph 60 or PPG paragraph 015 (Reference ID: 2a-015-20190220). It is far too conservative, and we believe that a further increased housing requirement would be justified, as has been proven at earlier stages of the Plan.

### **Economic growth aspirations**

- 2.2.11. We understand that the requirement of 486 dpa is based on an 'economic led' scenario (option 3 scenario) derived from the Strategic Housing Market Assessment Update (January 2019) [HOU001]. However, a figure of 486 dpa provides a nominal uplift above the LHN, and as we set out above, it does not even address the historic backlog from the previous plan, let alone meet future economic growth aspirations.
- 2.2.12. In our view, a higher requirement would better reflect the Spatial Vision, Strategic Aims and Objectives within Chapter 3 of the Plan. It would grasp the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the sub-region (such as the Port of Liverpool), as well as the level of growth proposed within the plan (including the proposed Strategic Rail Freight Interchange at Parkside). Simplistically, it would be difficult to sustain any meaningful level of economic growth in the Borough without creating the policy environment in which a sufficient quantum of new homes can be provided.

### **Choice and competition in the housing market**

- 2.2.13. In principle, it is positive that the proposed housing requirement (486 dpa) is higher than the LHN (434 dpa) and we are pleased that it has been expressed as a minimum requirement, rather than a ceiling target. However, as we set out above, the uplift is not sufficiently high enough to address the historic backlog from the Core Strategy (1,241 dwellings). By 'wiping clean' the shortfall and not being ambitious enough moving forwards, this is creating pent up demand from unmet need which hampers the ability to provide greater choice and competition in the housing market.
- 2.2.14. In our view, a higher requirement would help increase choice and competition in the housing market. Clearly, a higher housing requirement would need to be supported either by increasing density requirements on current proposed allocations (to make land more efficient) and/or by allocating more housing sites. This would help increase choice and competition in the housing market.

### Affordable housing need

- 2.2.15. Paragraph 61 of the NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. However, as stated above, there is a concern that the historic shortfall is being ‘wiped clean’ – a proportion of this unmet requirement will undoubtedly have been delivered as affordable homes. Alongside this, evidence supporting the Plan suggests that affordability in St Helens has worsened. In simplistic terms, if a sufficient number of new homes are not built, then affordability will worsen further.
- 2.2.16. In our view, a further increase to the overall housing requirement would place the Council in a much better position to meet its affordable housing target. Private sector-led developments make valuable contributions to the delivery of affordable housing alongside Registered Providers of Social Housing (“RPs”) as a proportion of new homes delivered secured by Policy LPC02. Therefore, an increase in overall new homes delivered will consequently increase the delivery of affordable homes. This increased supply in both affordable and market housing will increase the availability of housing for those on low incomes or those trying to get onto the housing ladder.
- 2.2.17. Barratt recommends that any consequential amendments to the Plan to accommodate an increased requirement would need to be dealt with through MMs.

### QUESTION 7

*Q7. Is the change in the housing requirement during the Plan preparation process justified?*

- 2.2.18. In our view, the change (i.e. reduction) in the housing requirement during the Plan’s preparation is **not justified** and therefore the Plan is **not effective or positively prepared**.
- 2.2.19. In the Council’s own words, 486 dpa figure is “substantially less” than 570 dpa. This runs contrary to the Government’s objective of significantly boosting the supply of homes in paragraph 59 of the NPPF and therefore is an unsound approach.
- 2.2.20. Our previous representations (at the Scoping Consultation, Preferred Options and Publication Draft stages) have consistently argued for a housing requirement which is higher than the LHN. We were supportive of the previous 570 dpa figure proposed at the Preferred Options stage in December 2016 as, amongst other things, it would allow for sufficient homes to be provided to meet housing needs align with the ambitions of the Liverpool City Region Combined Authority for growth.
- 2.2.21. The Council itself acknowledge (at paragraph 3.47 of SD025) that the preferred (at that time) housing requirement of 570 dpa incorporated an uplift 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 growth; and to reflect the high levels of house building achieved in years before and after the 2008-2009 recession. A further requirement was added to accommodate demolitions. In our view, these ambitions still exist.
- 2.2.22. As stated in SD025, a requirement of 570 dpa would have carried forward the Core Strategy (2012) housing requirement, which was originally set by the Regional Spatial Strategy for the North West (2008), which itself was a requirement for growth that was above housing need estimate. A growth approach was considered appropriate by the Council in December 2016 to help meet the Borough’s development needs and economic growth plans.
- 2.2.23. Whilst there has been a change in the strategic direction of the Plan between the Preferred Options Publication Draft stages, we strongly disagree with the statement at paragraphs 3.49 and 3.50 of

SD025 that there is no robust evidential basis to continue with a figure as high as 570 dpa. We are concerned that the Council's perceived attempt to placate concerns raised by objectors (as to the scale of Green Belt release) would be at the expense of meeting economic growth aspirations, providing choice and competition in the housing market and meeting affordable housing needs.

- 2.2.24. In our view, the supporting evidence and the underlying reasons for encouraging growth have not changed. To the contrary, affordability has worsened and there remains a very serious shortfall of housing. These issues could be addressed if the Plan's housing requirement (and supply) were increased further. We previously highlighted our concerns with a reduced requirement in our representations to the Submission Draft stage in March 2019.
- 2.2.25. Barratt recommends that any consequential amendments to the Plan to accommodate an increased requirement would need to be dealt with through MMs.



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