

Matter 2: Housing and Employment Needs and Requirements**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.

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

1. Our Client agrees that, in order to be consistent with paragraph 22 of the Framework, the Plan should cover a minimum period of 15 years from adoption. An end date of 2035 would not be consistent with the Framework in this regard, given the time that has elapsed since the drafting of the Plan commenced. Given that it will likely be late 2021, at the earliest, before the Plan is adopted, an end date of no earlier than 2037 should be incorporated into the Plan.
2. Such a modification is required in order to ensure consistency with the Framework, but it is noted that this could have an impact on the Plan and will require modification to both the Plan itself, and potentially the evidence base which underpins it. It is essential that the evidence base aligns with the timeframes of the Plan in this regard, to ensure that the correct number of homes and jobs in particular are being planned for.

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 11.6 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).

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?

3. Our Client considers that it would be prudent to extend the housing requirement by adding the additional two years of annual housing requirement. As discussed further below, our Client considers that there is extensive evidence to justify an uplift in the housing requirement than that currently proposed by the Council and that, accordingly, the Council should seek to identify additional housing in order to accommodate such an uplift. This is discussed in greater detail within our Client's response to Q5 and Q6.

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.

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).

Q3 Are the different base dates for employment land and housing requirements justified?

4. On behalf of our Client we previously provided comments on this basis within our Representations to the Submission Draft of the Local Plan, dated March 2019. Within these, it was noted that there is a degree of inconsistency between the Plan Period and the supporting evidence base documents, as illustrated by the Table below:

Description	Period
New Local Plan	2020 – 2035
Housing Requirement (LPA05)	2016 – 2035
Employment Allocations (LPA04)	2018 – 2035
St Helens Borough Estimated Employment Land Needs	2012 – 2037
OAN for new Employment Land	2012 – 2035
Residual Employment Land Requirement	2018 – 2035

- Noting that Table 1 above may be subject to change, if the Local Plan end date is to be extended as discussed in Q1 above, our Client remains of the view that it is unclear why these differences exist and considers that the failure to align the periods of time has the potential to introduce unnecessary complexity into the Plan, as well as uncertainty over the justification for its policies. Whilst the Council’s comments at PQ28 of document SHBC001 go some way to explain the Council’s position regarding employment land, it is still considered that the approach of having differing base dates for the Plan and supporting evidence documents is unjustified.
- If the Council is to achieve its Vision, as set out within the Plan, then it should strive to deliver over and above that which is prescribed by the OAN, both in the case of employment and housing, and so aligning the Plan Period (as discussed within our Client’s response to Q5 and Q6 below) with the evidence base (and vice versa) should not undermine the Council’s ambition to deliver growth and economic prosperity. Accordingly, the Plan, as written, falls short of being positively prepared.

Q4 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?

- Our Client does not consider that having a consistent base date would undermine the Council’s ability to meet its objectively assessed needs, particularly with regard to employment land, although we recognise that the Council considers that the employment land OAN itself may be reduced as a result of the changes to the base date. One would expect that the Council has provided sufficient employment land within its draft Plan to meet and ideally exceed the requirement, as written and based on the current base dates, and so

changing the base dates, assuming that the proposed employment allocations remained, would not alter the ability to meet these needs.

8. It is also important to recognise that the OAN is to be treated as a minimum figure, and the Framework provides that this can be exceeded should it be justifiable. Our Client is supportive of the Vision and ambitions of the Council to deliver growth, and we do not consider it necessary to reduce the employment requirement as a result of changes to the base date. Our Client would urge the Council to be ambitious, and deliver over and above the minimum requirements, for both housing and employment land, in order to deliver the growth and economic prosperity it desires and is capable of doing. Whilst it is noted that the Plan proposes a modest uplift to the housing requirement, it is not considered that it goes far enough to deliver the growth ambitions of the Council. This is discussed in greater detail within our Client's response to Q5 and Q6 below, but our Client would stress that, in the interests of a sound plan, the Council should be positive, and seek to deliver over and above the prescribed minimum requirement.

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).

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

9. Yes. The Local Plan is clear in its support for the Liverpool City Region (LCR) Growth

Strategy, which covers seven local authorities in the sub region. The Plan states *"The Plan's approach accords with that of the Liverpool City Region growth strategy"*.¹

10. Furthermore, Policy LPA04: 'A Strong and Sustainable Economy' of the Plan states how the Council will work to *"help meet the Liverpool City Region's needs for economic growth"* and *"maximise the economic opportunities presented by St. Helens Borough's location in relation to strategic road and rail routes."*²
11. In this context the Council is clear in its support for the economic growth aspired to in the LCR Growth Strategy. In order to achieve this growth strategy, and for the Local Plan to be effective, the growth aspiration and the housing requirement must be aligned. The Standard Method (SM) provides the minimum need only, and if a higher figure is required to achieve the economic growth aspired to by the Council then it is completely justified.
12. It is also important to highlight PPG's contrasting approaches for testing a housing need figure which is lower or higher than the SM minimum.
13. In short, PPG explains 'circumstances' must exist supporting a higher figure, whereas 'exceptional circumstances' must exist for a lower figure. There is a clear difference. This is expanded upon further below.
14. PPG³ confirms a need figure lower than the SM minimum must be supported by *"robust evidence"* and *"realistic assumptions of demographic growth"*. This must show *"exceptional local circumstances"* exist to justify the lower figure. This evidence will then be *"tested at examination."*
15. In contrast, PPG states that a higher figure *"can be considered sound"* providing it *"adequately reflects current and future demographic trends and market signals."*⁴. PPG's testing of a lower figure is clearly more rigorous than a higher figure.
16. PPG's section titled *"When might it be appropriate to plan for a higher housing need figure than the standard method indicates?"*⁵ expands on the matter of housing need exceeding the SM minimum. This section in PPG emphasises the need for local authorities to consider

¹ Paragraph 4.6.6, page 21, SD001

² Policy LPA04, page 29, SD001

³ Paragraph ID2a-015, PPG, 20 February 2019

⁴ Paragraph ID2a-015, PPG, 20 February 2019

⁵ Paragraph ID2a-010, PPG, 16 December 2020

whether need exceeds the SM minimum. Not doing so ignores PPG advice.

17. At the outset, PPG⁶ identifies SM's constrained nature and why it establishes minimum need, stating "*The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates⁷*" (our emphasis).
18. PPG⁸ then lists circumstances for increasing the SM minimum, although it states the circumstances listed are not exhaustive:
 - *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
 - *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
 - *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.⁹ (our emphasis).*
19. In considering whether these or additional 'circumstances' exist it is also important to note that PPG does not set a 'threshold' for a higher figure, or limit the circumstances that might apply. Such a threshold is a matter of judgement.
20. It is also important to distinguish between housing need and housing requirement. PPG¹⁰ states "*Housing need is an unconstrained assessment of the number of homes needed in an area. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations¹¹*" (our emphasis). This clarifies that need and requirement are distinct processes.
21. To emphasise this, PPG¹² states "*The standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure¹³*" (our emphasis).

⁶ Paragraph ID2a-010, PPG, 16 December 2020

⁷ Paragraph ID2a-010, PPG, 16 December 2020

⁸ Paragraph ID2a-010, PPG, 16 December 2020

⁹ Paragraph ID2a-010, PPG, 16 December 2020

¹⁰ Paragraph ID2a-001, PPG, 20 February 2019

¹¹ Paragraph ID2a-001, PPG, 20 February 2019

¹² Paragraph ID2a-002, PPG, 20 February 2019

¹³ Paragraph ID2a-002, PPG, 20 February 2019

22. Local authorities should determine whether housing need exceeds the SM minimum before the housing requirement is considered. In the case of St Helens, this is entirely appropriate in the context of economic growth policies and the growth strategies across the wider LCR of which St Helens is a delivery partner.
23. Whilst it is noted that the proposed requirement of 486 dpa represents a modest uplift on the OAN, our Client does not consider that the uplift truly aligns with the LHN given both the previous rates of delivery and the economic circumstances of St Helens (and its relationship to the LCR). The Plan justifiably proposes an uplift in the housing requirement, but our Client considers that this uplift does not go far enough and would fail to deliver the economic prosperity and growth which underpin the Council's Vision. On this basis therefore, our Client does not consider the Plan to be positively prepared, in that it will fail to deliver the Council's Vision, and therefore fail to meet the needs of residents.

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?

24. Yes. We refer to our Clients response to Q5 above. Our Client considers that the housing requirement of 486 dpa would not be when considering previous delivery trends and the economic circumstances of the area (owing to its relationship to the LCR). We consider, therefore, that 486 dpa should be considered the **minimum** level of housing need in the context of other evidence concerning the growth of the LCR.
25. The 2018 Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) is only 2-3 years old and includes an assessment of economic-led housing need underpinned by a 'business as usual' baseline economic growth scenario, and a 'growth' scenario, both produced by Oxford Economics (OE).
26. The 'growth' scenario was underpinned by "*additional data **provided by each of the local authorities** regarding transformational developments which will influence future economic growth, but which may not be reflected in the Baseline forecast*"¹⁴ (our emphasis). Furthermore, the SHELMA also states that "***local authority officials** responsible for regeneration in each local authority provided details on future development projects and proposals for each respective area. This included information on time scales, likely levels of*

¹⁴ Paragraph 1.10, SUB001

employment, and the type of employment (office, retail, leisure, etc.) to be generated”¹⁵ (our emphasis).

27. It is therefore clear that the growth scenario was underpinned by evidence submitted by St. Helens Council officers only 2-3 years ago. Notwithstanding the 'Housing Need and Supply Background Paper' stating "*the SHELMA took account of all of the proposed employment land allocations in the Local Plan Preferred Options Stage (2016), which were reduced at the Local Plan Submission Draft stage*"¹⁶, the evidence for transformational economic growth was submitted relatively recently.
28. The evidence provided by the Council led to the SHELMA determining housing need of **855 dpa**¹⁷ for St. Helens. This demonstrates that the proposed housing requirement of 486 dpa represents a very conservative, and constrained approach to economic-led housing growth.
29. Furthermore, ID2a-010 of the 2019 PPG (When might it be appropriate to plan for a higher housing need figure than the standard method indicates?) also refers to **past levels of housing delivery** as 'circumstances' which may justify a housing requirement which exceeds the SM minimum.
30. Document SD025¹⁸ sets out net housing completions for St Helens between 2003/04 and 2019/20. However, it only reports *average* net completions over 10 years, 15 years, and 17 years. Yet it also shows that average delivery has been **591 dpa** since the country began to emerge from the last economic recession (the last seven years) and **601 dpa** over the past five years (2015/16 – 2019/20). The last two years suggest an increasing trend in net completions (775 and 758 dpa respectively).
31. In this context it is considered that St Helens has shown its ability to consistently deliver **at least 100 dpa** more than the Local Plan is currently planning for, and indeed that there is a demand for such a scale of growth; giving clear market signals.
32. **Affordable housing need** should also be considered in the context of overall housing need and the housing requirement. Document SD025 reports the 2019 SHMA's findings of affordable need being **117 dpa** over the Plan period.

¹⁵ Paragraph 6.2, SUB001

¹⁶ Paragraph 2.20, SD025

¹⁷ Table 36, page 109, SUB001

¹⁸ Table 4.1, page 27, SD025

33. Our Client accepts that there is no national policy requirement for affordable housing need to be met in full. This was confirmed by the High Court (Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government, CO/914/2015, July 2015).
34. However, the PPG (67-008-20190722, 22 July 2019) states that *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."* In this context it is considered that the Council should allocate as much land as possible to deliver affordable housing need if the assessment of affordable need requires it. Indeed, as demonstrated in paragraph 31 above, the market is clearly capable to supporting higher levels of housing growth overall, which brings with it the opportunity delivery greater levels of much needed affordable housing.
35. Policy 'LPC02: Affordable Housing' of the submitted Local Plan identifies varying levels of affordable housing provision requirements in the Borough. The provision ranges from 10% (on brownfield sites of 11 or more dwellings) to 30% (on greenfield sites of 11 dwellings or more. On this basis, overall affordable housing delivery would range from 923 (10% provision) to 2,770 (300% provision) over the Plan period if affordable housing were to be met in full. If affordable housing was secured at 20% (i.e. the middle of the range), overall delivery could be 1,847 affordable dwellings over the Plan period.. The SHMA (. HOU001), which assesses the period 2016-2033, indicates that 1,987 affordable homes will be required (117 dpa) will be required up to 2033. If extending the Plan period to 2037 based on this requirement, the total affordable housing projected need would be 2,455.
36. Past delivery rates of affordable housing should also be considered. With reference to SD025¹⁹, affordable housing completions in St Helens averaged 102 dpa between 2012/13 (the earliest year reported in SD025) and 2019/20. Over the same period, overall net housing completions averaged 440 dpa.²⁰ This means that affordable housing completions averaged 23% of overall housing provision. At a rate of 23% provision, the Plan's would need to be 509 dpa to deliver affordable need in full (based on affordable need of 117 dpa).
37. The **past five years** data from SD025 shows average affordable housing completions (118 dpa) representing 19.6% of overall net completions (average 601 dpa), in circumstances where the adopted Core Strategy aims to achieve 30% affordable housing provision on sites of 5 or more units.

¹⁹ Table 3.1, page 23, SD025

²⁰ Table 4.1, page 27, SD025

38. We accept that the above analysis represents a high-level exercise and there are many influences, including viability. However, what is clear is that there is an opportunity to meet the Borough's affordable housing needs in full. This cannot be achieved with the current housing requirement of 486 dpa. When factoring the expected rate of delivery on small sites (93 dpa) 30% affordable housing provision would need to be achieved on all sites of 11 or more new dwellings²¹ to meet the affordable housing need of 117 dpa.
39. If an average of 20% affordable housing were achieved on all sites of 11 dwellings and above, annual completions would need to be 580 dpa. Adding in the small sites allowance to ensure there are sufficient qualifying sites, this leads to a Local Plan housing requirement of 673 dpa. Whilst this housing requirement does not go far enough to meet the full economic growth scenario of the LCR SHELMA, it goes significantly further than the current Local Plan housing requirement.
40. We have therefore established that there is a clear necessity for increasing the Local Plan housing requirement over and above 486 dpa in order to meet economic growth aspirations and affordable housing needs. Furthermore, there is a proven track record and an ability to deliver a significantly higher level of housing completions in St Helens, having regard to past trends, market signals and the availability of land to do so. Based on past completion rates, therefore, in order to realise the Plan's Vision and to meet as close as possible the housing needs of the Borough's residents, **an uplift to circa 590-600 dpa should be considered.**

Q7 Is the change in the housing requirement during the Plan preparation process justified?²²

41. As set out within their earlier Representations, our Client is disappointed that the Council has chosen to reduce its housing requirement during the evolution of the Plan, from 570 dpa at the Preferred Options Stage to the 486 dpa now proposed. They consider this to be a backwards step which goes against the Vision and growth aspirations advocated by the Plan and its evidence base, as highlighted above.
42. We re-iterate our conclusions at Q5 and Q6 above, in that a significant uplift in the housing requirement, based upon historic delivery rates and economic evidence would be fully justified, and would ensure that the Council can meet the development needs of its residents

²¹ 30% of 393 equates to 117 dpa

²² These are summarised at pages 19-20 of the Housing Need and Supply Background Paper
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whilst also delivering the growth and prosperity it desires; ensuring that the two are aligned and that the Local Plan is therefore positively prepared and effective.

Issue 3: Employment Need and Requirement

The Plan identifies a need to deliver a minimum residual of 219.2ha of employment land between 2018 and 2035 (Policy LPA04) against an OAN of 227.4ha. This residual need would increase to 230.8ha if the end of the Plan is extended to 2037 (and likewise the OAN would increase to 239ha for this extended period). 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 residual requirement would be 155.69 between 2020 and 2037 (see SHBC001-PQ28) against a revised OAN of 215.8ha (2016-2037).

Q8 Is this employment land requirement justified and supported by the evidence?

43. The Council's Housing Need and Supply Background Paper (October 2020) (Doc. Ref. SD025) indicates throughout that the level of housing need is based upon a number of factors, including employment need, of which it notes that St. Helens has a number of unique attributes which make it a highly favoured location for logistics development. The St Helens Employment land Needs Study Addendum Report, January 2019 (Doc. Ref. EMP001) indicates an employment land need of between 190 and 239 hectares between 2012 and 2037.
44. Notwithstanding this, and as stated above, our Client has concerns around the housing requirement proposed by the Council and does not consider that this goes far enough to meet the development needs of its residents, as well as the Vision which underpins the Plan. As such, our Client considers that the employment requirement should align with the housing requirement and so, noting our Client's previous comments in this regard, should be subject to a significant uplift.

Q9 How does the figure compare with trends in the past take-up of employment land?

45. Our Client has no comments to make in this respect.

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).

Q10 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?

46. Our Client has no comments to make in this respect.

Q11 Does comparing the situation in St Helens with neighbouring authorities indicate that there was a lack of suitably attractive sites?

47. Our Client has no comments to make in this respect.

Q12 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?

48. Our Client has no comments to make in this respect.

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

Q13 Can this be primarily attributed to an increase in the availability of sites or are there other relevant factors?

49. Our Client has no comments to make in this respect.

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.

Q14 Is this approach justified?

50. Our Client notes the lower take up rates since 2012 and does not dispute these. They do also note however that the constraints of the Borough (i.e. prevalence of Green Belt land) and the out-of-date Development Plan, and the lack of an emerging allocations

DPD following the adoption of the Core Strategy in 2012, could have restricted the supply and thus constrained the historic take-up of employment land.

51. Our Client would urge clarification from the Council in this regard as such a position would necessitate an increase in the OAN for employment land (and so also for housing land), in order that the Plan is based on a robust evidence base which acknowledges that the Local Plan itself has not evolved as envisaged by the Council upon the adoption of the Core Strategy in 2012 and that, as a result of this, delivery since then has been constrained.

Q15 Would the inclusion of post-2012 take-up rates affect the historic baseline for predicting needs? If so how?

52. Our Client has no comments to make in this respect.

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).

Q16 What would be the implications for the Plan if the OAN requirement were reduced by 4 (or 2) years?

53. Our Client has no comments to make in this respect beyond those made in response to Q14 above..

Q17 How would these implications be addressed?

54. Our Client has no comments to make in this respect.

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 to 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.

Q18 If changing the baseline date to 2016 affected the residual employment land requirement, what implications would there be for the Plan?

55. Our Client has no comments to make in this respect.

Q19 How would these implications be addressed?

56. Our Client has no comments to make in this respect.

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).

Q20 Does the recent data demonstrate that there is a strong demand for large-scale warehousing to serve the logistics sector?

57. Our Client has no comments to make in this respect.

Q21 Is this demand likely to be sustained during the Plan period on the scale envisaged by the land allocated for this type of development?

58. Our Client has no comments to make in this respect.

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.

Q22 Is this justified and consistent with national policy?

59. Whilst our Client considers that such a requirement is not explicitly stated within the Framework, they do consider that it accords with the thrust of paragraphs 80 to 82, and our

Client is supportive of the additional employment land which has been included to support additional need deriving from major projects and the logistics sector. It is sensible for the Council to be flexible and for it to ensure that it can react to increased demands arising from these sources. They would stress however that it is important, in the interests of the sustainability of the Plan, that the housing requirement is such that any increases in demand for employment space can be matched by increases in housing provision (noting the identified attractiveness, and unique characteristics of St Helens which mean that it appeals to the logistics sector). In order to ensure that those who work in the Borough can also live there, this will also pave the way for a utilisation of sustainable transport, and release the reliance on the private car.

Q23 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) justified?

60. Our Client has no comments to make in this respect.

Q24 Is there a risk that the potential for future growth in this sector may have been over estimated?

61. Our Client has no comments to make in this respect.

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

Q25 Is an additional 5-year buffer necessary, justified and consistent with national policy?

62. As detailed above, the ELNS identifies an employment land OAN of 239 hectares being required over the Plan period to 2037. When removing the buffer, this leaves 210 hectares. As a percentage, 29 hectares equates to 12% of the overall requirement. Whilst the Framework does not define an appropriate buffer to employment land, given that a 10% buffer is generally considered appropriate for housing land, this could also be considered an appropriate buffer for employment land. Whilst, at 12%, the proposed buffer would be a little over this figure, our Client has no objections to it, notwithstanding their previous comments in relation to the uplift in housing and employment land requirements.

Q26 How was the extent and nature of the buffer required identified?

63. Our Client has no comments to make in this respect.

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.

Q27 Does the above likely timeline have any consequences for the Plan?

64. Our Client does not consider that the progression of the St. Helens Local Plan should in any way be delayed on the basis of the progress of the Warrington Local Plan. If every local planning authority were to wait for its neighbouring authorities to have an adopted, or tested, Local Plan before adopting its own, the Local Plan would be subject to significant, unjustifiable delays. Notwithstanding this, having not been subject to independent examination, there can be no assurances (other than an in-principle agreement between the two authorities) that the evidence base which underpins the Warrington Local Plan is sound. This is pertinent because it is clear from the Statement of Common Ground (SD012) that St. Helens will have a role to play in meeting some of Warrington's unmet demand. As such, delays in the examination of Warrington's Local Plan could impact on the extent that St. Helens is needed assist Warrington in the provision of employment land and this may mean that the extent of Warrington's unmet need may be greater, or lesser than currently stated, which could have implications on St. Helens' role.
65. It is appropriate for the Council to take the latest evidence and apply it, with a caveat that a Local Plan review should be triggered to deal with any later implications for alternative conclusions at the Examination of the Warrington Local Plan, should the need for cross-boundary delivery in St Helens increase.

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

Q28 Is the provision of 31 ha of employment land to meet some of Warrington's needs justified?

66. The Council's response as per Q27 above remains pertinent, noting that Warrington's employment land requirement (and accompanying evidence) has not been subject to scrutiny

and independent examination, and so the Council cannot be certain of the extent of the unmet employment land need across Warrington.

67. Notwithstanding this, our Client is fully supportive of the Council's intention to assist neighbouring authorities in addressing their unmet need, in recognition of the potential this has in meeting their own Vision and ambitions for growth and economic prosperity, as well as for ensuring that wider sub-regional economic growth is not stifled.

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.

Q29 Is there sufficient evidence to indicate a clear alignment between housing and employment land requirements, particularly given the different base dates referred to above?

68. Notwithstanding the degree of confusion which is afforded by the differing base dates across the Plan and its current evidence base (as discussed at Q3 of this Statement), it is clear from the Council's response to PQ43 that it remains of the view that the housing requirement of 486 dpa is sufficiently aligned with the identified need for employment land, albeit the figures are proposed to be amended on the basis of the revised end date of the Plan and the identification of Site EA1 (Omega South) to serve specifically to meet the unmet employment needs of Warrington, with any housing associated with this also serving to address Warrington's unmet housing needs. It is clear that the theory behind this approach has not changed since the Submission Draft Local Plan was published.
69. Policy LPA05 sets a housing requirement for the Borough, over the Plan period, of 486 dpa (10,206 in total, assuming a revised Plan period of 2016 to 2037). This is a notable reduction from the Preferred Options document, which proposed 570 dpa, equating to a total requirement of 10,830 dwellings between 2014 and 2033.
70. The annual requirement of 486 dpa is arrived at following the application of the Government's Standard Methodology for calculating objectively assessed needs for housing. Whilst the Plan rightly acknowledges that this is a starting point, and that the stated housing requirement incorporates an uplift from the Standard OAN by 18 dpa, it is not clear how this requirement

has been arrived at and how it relates to the Council's aspirations for economic growth.

71. As a starting point, our Client considers that a housing requirement of 855 dpa should be considered, to truly align with the economic growth scenario set out in the SHELMA, to which, by the Council's own admission, the economy of St Helens is inextricably linked. Without a significant uplift, it cannot be concluded that the SDLP is positively prepared or effective. However, we are mindful of past trends which, albeit constrained by Green Belt and an out-of-date Development Plan, indicate such a requirement may be difficult to achieve. In the event that the Council does not consider such a housing requirement to be deliverable, it should at least aim to deliver the St Helens Strategic Housing Market Assessment (January 2019) Update's economic growth uplift requirement of 514 dpa, but then factor in a further uplift to provide an opportunity to meet affordable housing needs. This would result in an achievable housing requirement in the order of 590-600 dpa.