

St Helens Borough Local Plan Examination
Matter 7 Hearing Statement on behalf of
Peel L&P (Participant ID RO1959)

May 2021

Contents

1.	Issue 1: Housing Mix	2
2.	Issue 3: Affordable housing	1

1. Issue 1: Housing Mix

Q1: Is Section 1 of Policy LPC01 positively prepared, justified and effective in reflecting the needs of different groups in terms of size and type of housing?

- 1.1 We consider in broad terms that the analysis presented in section 7 of the 2019 SHMA (HOU0001) uses a robust methodology to calculate the needs of different groups, noting that the findings are to be used in applying Policy LPC01.
- 1.2 We agree that the evidence indicates that there will be a range of need for different sizes, types and tenures of housing. We note that the supporting text of the policy repeats the SHMA's conclusions on the mix of market housing needed at Table 6.1. We also note that paragraph 1 of the policy suggests that new housing should be designed to address local housing need '*informed*' by the latest SHMA.
- 1.3 We support the suggestions, at paragraph 6.3.4 of the Plan, that this mix will only guide the Council's assessment of planning applications, that it will be '*kept under review*' and finally that each application will '*be considered on its own merits*'. We consider the correct application of these statements to be very important where it must be recognised that need and demand will vary in different parts of the borough, and that a variation on the mix will be more appropriate for sites of different sizes and in different market contexts. It is noted that the SHMA Update itself clearly states the need for the evidence to be interpreted and applied in policy in this manner, confirming at paragraph 8.27 that:

"In applying these to individual development sites regard should be had to the nature of the development site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level"
- 1.4 Whilst we view the approach taken in the SHMA to derive a mix of housing as being broadly robust, in line with our representations on Matter 2 we consider that the approach taken in the SHMA Update to align housing and employment needs serves to underestimate the true scale of housing need over the plan period. Where we agree that the Council's economic growth aspirations will result in a stronger need for housing, we consider that sustainably accommodating the future level of employment growth will require greater growth in the borough's population, and in particular its working age population.
- 1.5 In this context, the SHMA Update confirms – even under its own modelled assessment of the type and size of homes required to support employment growth – that this will result in a more pronounced need for larger market housing (Tables 31 and 32). This recognises that demand is more likely to arise from younger people who are more likely to be part of family households, and who in turn it observes are more likely to live in larger homes. It also acknowledges at paragraph 7.5 that the methodology deployed, which necessarily reflects the current local stock profile, is likely to underestimate the need for larger family housing where such homes are currently underrepresented in St Helens, as recognised at paragraph 2.5.1 of the Plan.
- 1.6 The result therefore is a position where the need for larger family homes is likely to be more pronounced than the SHMA suggests in absolute and proportionate terms.

1.7 Furthermore, where it is acknowledged that the approach taken in the SHMA Update does not attempt to predict future behaviours or aspirations, there are widespread reports of a growing desire for more space following the events of the last year, to accommodate home working and family life¹. Whilst we agree that it is not possible to predict whether these preferences will be maintained, they reinforce the importance of ensuring flexibility in the planned supply of homes in the borough.

1.8 As a result we consider that the policy should more explicitly and positively acknowledge the need to provide larger housing. As we set out in our response to Q6, we also consider that the policy should explicitly recognise this need, and that the Council should ensure that the supply of land will provide the flexibility required to accommodate it over the plan period. This accords with the recommendation in the SHMA Update which affirms on page 52 that *'the analysis of an appropriate mix of dwellings should also inform the 'portfolio' of sites which are considered by the local authority through its local plan process'*.

Q2: Does the reference to the 'latest SHMA' in Policy LPC01 result in a positively prepared and effective policy?

1.9 In line with our response to Q1, we consider that it is appropriate to reference the 'latest SHMA' albeit that in line with the supporting text this is only used to 'guide' the application of the mix with a need to also take into account 'relevant evidence' (paragraph 6.3.4).

1.10 We would recommend that the text should be more explicit in acknowledging an intention to consider separate and more up-to-date local need evidence where it is provided by the applicant to justify an alternative mix.

Q3: Taking into account the findings of the SHMAs and the need to make effective use of the land, is the 5% requirement for bungalows on larger greenfield sites in Section 3 of the Policy LPC01 justified (see SHBC001 – PQ60)?

1.11 No comment.

Q4: Does Policy LPC01 make sufficient provision for the housing needs of older people?

1.12 No comment.

Q5: Does Policy LPC01 make sufficient provision for the housing needs of those who wish to build their own homes?

1.13 No comment.

Q6: Should Policy LPC01 make reference to a need for detached houses based on the low number of such homes within the housing stock (paragraph 2.5.1 of the Plan refers)?

1.14 Where detached homes are more likely to satisfy the needs of those in skilled employment, it is important for the Local Plan to proactively seek to address an acknowledged deficit in the current housing offer in order to support its wider economic growth aspirations.

1.15 The 2019 SHMA Update (HOU001) supports this position, as noted in our response to Q1, where it confirms through Table 32 that in providing for a level of housing need

¹ Centre for Economic Performance (March 2021) The pandemic and the housing market: a British story

which is aligned to anticipated employment growth the need for larger homes with at least four bedrooms increases.

- 1.16 On this basis, we would recommend that Policy LPC01 explicitly references the need to provide for more detached homes or aspirational family homes where this could cover a broader definition of the current identified deficit in the borough's stock.
- 1.17 In accordance with our response to Q1, we consider it vital that the Council also adequately demonstrates that the supply of land identified through the Plan responds to this need where such homes are more likely to be accommodated on sites where lower densities are appropriate.

2. Issue 3: Affordable housing

Q12: Is the zonal approach to the provision of affordable housing within Policy LPC02 positively prepared and justified by proportionate evidence including the EVA?

- 2.1 It is noted within the introductory text to Issue 3 that sites in Zone 1 would not be expected to make any affordable housing provision, resulting in potential tension with paragraph 64 of the Framework. It should also be noted that brownfield sites in Zone 2 would also not be required to make any such provision in accordance with Policy LPC02.
- 2.2 That paragraph 64 of the Framework explicitly requires major housing sites to provide at least 10% of units as affordable homes for ownership is a clear message from the Government of the importance placed on affordable housing provision. It is singled out as a strategic issue for Local Plans to deal with.
- 2.3 Given this specific provision, and the wider requirement to meet affordable housing needs embedded within paragraph 61, it is necessary for the Council to have due regard to the ability of different areas of the Borough to contribute to affordable housing provision in determining the appropriate distribution of housing sites. Sites should then be selected for allocation in this context. The objective being to ensure the Borough's affordable housing needs can be met in the spirit of paragraphs 61 and 64 and, in the context of the former, noting that meeting the housing requirement is much more than a question of doing so in a purely quantitative sense.
- 2.4 Peel's Regulation 19 representations raised some concerns about the methodology adopted in undertaking the EVA. Notwithstanding this, it accepts the general conclusions of it, and particularly that there are areas of the Borough where affordable housing is not viable. This is carried into Policy LPC02 through the zonal approach to affordable housing.
- 2.5 The zonal approach is appropriate in principle. However, what this highlights is that the Local Plan is inadequately equipped to meet the affordable housing requirements of the Borough, in no small part due to the spatial distribution of housing and the over reliance on land within areas where this cannot be viably delivered – Zone 1 (all sites) and Zone 2 (brownfield sites only) as reflected in Policy LPC02.
- 2.6 Analysis of Appendix 1 of Examination Document SHBC011 indicates that 5,147 dwellings have been delivered, or are expected to be delivered, between 2016 and 2037 on **brownfield** land in Zone 2 areas (the wards of Haydock, Blackbrook, Newton-le-Willows, Earlestown, Bold, Sutton, Thatto Heath, Moss Bank, Windle, West Park and Billinge and Seneley Green) with 2,663 dwellings on **brownfield or greenfield** land in Zone 1 (the wards of Parr and Town Centre). Cumulatively this accounts for some 79% of the projected supply located in areas and on sites where Policy LPC02 would not require any affordable housing to be provided.
- 2.7 In the context of an intention to deliver 117 affordable homes per annum (representing 24% of the proposed requirement), this represents a significant failing of the Local Plan and a clear conflict with paragraphs 61 and 64 of the Framework. Given the importance

of market housing schemes in delivering affordable housing, it is evident that the affordable housing needs of the Borough will not be met through the approach proposed, contrary to the objectives of the Local Plan. An approach to the spatial distribution of housing sites which can increase the delivery of affordable housing, in the context of Policy LPC02, should be advanced with sites selected for allocation accordingly. The release of additional greenfield land in Zones 2 and 3 would at least begin to correct this deficiency.

- 2.8 Changes to the Local Plan since the Preferred Options Plan (2016) represent a retrograde step in this regard. The Preferred Options Plan proposed more than 1,500 additional dwellings on greenfield land in Zones 2 and 3 than the submission Plan. Based on the provisions of Policy LPC02, this would yield in excess of 450 additional affordable units over a 15 year period compared to the submission Plan. This represents some 4 years of affordable housing requirement with no plan set out by the Council as to how it will meet this significant shortfall by any other means.

Turley
1 New York Street
Manchester
M1 4HD

T 0161 233 7676