



Barratt Homes (RO1944)

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# ST HELENS LOCAL PLAN EXAMINATION

Matter 5 – Housing Land Supply





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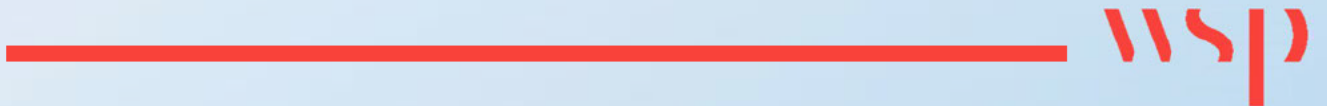
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# INTRODUCTION



# 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 5 (Housing Land Supply), specifically in relation to:
- Issue 1 (Components of Housing Supply) – Question 4;
  - Issue 2 (The Housing Trajectory) – Questions 9 and 10;
  - Issue 3 (Five Year Housing Land Supply) – Questions 13, 14 and 17.
- 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 4 – the supply should make an allowance for demolitions;
  - Question 9 – the evidence that supports the housing trajectory is not based on realistic assumptions;
  - Question 10a – a lapse rate should be applied to sites in the next five years;
  - Question 10b – the evidence about the delivery of SHLAA sites is not robust;
  - Question 10c – the evidence about the delivery from stalled sites is not robust;
  - Question 10d – the assumptions about delivery from allocations are not robust;
  - Question 10e – lead-in times and build out rates are unrealistic;
  - Question 10f – the significant spike in delivery in the trajectory is unrealistic and is not supported by evidence;
  - Question 13 – the assumptions about the five-year supply are unrealistic;
  - Question 14 – lead-in times and build out rates within the five-year supply are unrealistic; and
  - Question 17 – Policy LPA05 will not be effective in maintaining delivery through the Plan period.
- 1.1.5. To aid the Inspectors, we have cross-referenced our answers to the ‘tests of soundness’ and have suggested modifications 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 Tuesday 15 June 2021

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**QUESTIONS**



## 2 QUESTIONS

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### 2.1 ISSUE 1: COMPONENTS OF HOUSING SUPPLY

#### QUESTION 4

*Q4. 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?*

- 2.1.1. In our view, an allowance should be made for demolitions, and this is required to ensure that the Plan is **positively prepared, justified, effective and consistent with national policy**.
- 2.1.2. If the Council is to make an allowance for additions to the housing supply on small currently unknown (i.e. 'windfall') sites (based on historic trends occurring into the future), then logically it ought to balance this out by allowing for estimated future demolitions on the same basis.
- 2.1.3. According to Table 4.1 of SD025, an average of 51 dwellings per annum ("dpa") were demolished or converted (from residential) to other uses between 2003/04 and 2019/20.
- 2.1.4. In recognition of these trends occurring in the future (albeit at a lesser rate), the current adopted Core Strategy (October 2012) [LOC001], at Table 14.2, applied a demolitions allowance of 26 dpa to its housing trajectory. Indeed, this was carried forward at the Preferred Options (December 2016) stage [LPI003] which, at paragraph 4.102, included a demolitions allowance of 29 dpa.
- 2.1.5. Unless planning applications involve the demolition and replacement of existing dwellings (i.e. 'net additions') within the same permission, then demolitions are not automatically accounted for, and consequently the housing trajectory will appear 'over inflated'.
- 2.1.6. Therefore, Barratt requests that a demolitions allowance be reinstated within the housing trajectory.

### 2.2 ISSUE 2: THE HOUSING TRAJECTORY

#### QUESTION 9

*Q9. Is the evidence that supports the Housing Trajectory (Figure 4.3 as amended by Appendix 1 to SD025) based on realistic assumptions?*

- 2.2.1. Overall, the latest housing trajectory contained within the Updated Employment and Housing Land Supply Position as of 31.03.2021 (May 2021) [SHBC007] is not based on realistic assumptions and therefore the Plan is **not positively prepared, justified, effective or consistent with national policy**.
- 2.2.2. Paragraphs 007, 010, 016 and 020 (Reference IDs: 68-007-20190722, 68-010-20190722, 68-016-20190722 and 68-020-20190722) of the 'Housing supply and delivery' section of Planning Practice Guidance ("PPG") encourage local planning authorities ("LPAs") to engage and confirm delivery intentions and anticipated start and build-out rates with developers. This is echoed by paragraphs 007 and 022 (Reference IDs: 3-007-20190722, 3-022-20190722) of the 'Housing and economic land availability assessment' section of PPG.
- 2.2.3. However, Barratt (as developer of Site 2HA) has not been consulted by the Council in the preparation or update of the housing trajectory, which is concerning given that its proposed allocation forms a crucial part of the Plan.



- 2.2.4. Unlike the Council's assumptions, there are no barriers to Site 2HA coming forward and supporting infrastructure will be delivered at the right time and place.
- 2.2.5. Barratt is keen to work with the Council to move the site forward and has programmed in the submission of a planning application immediately upon adoption of the Plan (or sooner if a positive Inspectors' Report is received) to enable a start on-site within the immediate five year period, facilitating the delivery of 600 homes in the short to medium term.
- 2.2.6. Site 2HA should therefore be included within the five-year housing land supply ("5YHLS").
- 2.2.7. In addition, unrealistic assumptions have been applied by the Council to other components of the housing trajectory, which require modification. We elaborate on this in response to Question 10.

### **QUESTION 10A**

*Q10a. 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)?*

- 2.2.8. We support the inclusion of a lapse rate within the housing trajectory, particularly where there is less certainty for 'developable' sites coming forward in the latter years (6-15) of the Plan.
- 2.2.9. In our view, the application of a lapse rate within the next five years (0-5) would also be reasonable. Whilst there is more certainty regarding 'deliverable' sites, this does not necessarily mean that all homes on a site will be built when predicted.
- 2.2.10. As evidenced by previous housing trajectories and historic completions, there has been variance between the Council's forecasts and actual delivery. Many reasons why actual delivery differs lie outside the control of planning (e.g. changing market conditions or abnormal issues). For example, there are 'stalled sites' within the envisaged supply. Other sites may commence within the next five years but may not be fully built out until later in the Plan.
- 2.2.11. Applying lapse rates to the entire housing trajectory would provide the flexibility required in circumstances where sites do not deliver in the expected timescales.
- 2.2.12. If the Inspectors conclude that a lapse rate ought to be included within years 0-5, then Barratt recommends that Site 2HA should be brought forward sooner in the housing trajectory to help 'plug the gap' (notwithstanding that there is already a lack of a 5YHLS). Site 2HA as an allocation is ideally placed to come forward within the immediate five-year period.

### **QUESTION 10B**

*Q10b. Is the evidence about the delivery of SHLAA sites contained within the SHLAA together with SD025 and SHBC004 robust?*

- 2.2.13. In our view, the evidence about the delivery of 'SHLAA sites' is not robust.
- 2.2.14. Firstly, we note that the Strategic Housing Land Availability Assessment ("SHLAA") was originally published in July 2017 [HOU002].
- 2.2.15. We are concerned that a thorough review of the SHLAA, following the methodology set out in the 'Housing and economic land availability assessment' section of PPG (which has evolved since the 2017 SHLAA was prepared), has not been undertaken. For example, the Council has not contacted developers of proposed allocations for updates on anticipated start and build-out rates, as required by PPG (see Question 9).

- 2.2.16. Rather, it appears that partial, less thorough updates to the housing trajectory have been undertaken (the latest of which is included within SHBC007). In general, sites and completions have been further ‘pushed back’ into latter parts of the Plan period (presumably to account for delays to the Plan’s adoption), rather than being properly reassessed in planning terms, with input from the development industry (as they ought to have been).
- 2.2.17. We are alarmed that a number of ‘SHLAA sites’ still form part of the housing trajectory despite not having been properly and thoroughly re-assessed since July 2017. Our understanding is that most ‘SHLAA sites’ do not have planning permission. They comprise a mix of brownfield (previously developed) and greenfield land within the urban area.
- 2.2.18. Specifically, Barratt is concerned with:
- Sites which were assessed in the 2012 SHLAA as being ‘deliverable’ or ‘developable’, but there is no evidence to show that progress has been made to bring them forward in the past decade – e.g. sites 13, 22, 23, 31, 58, 59, 63;
  - Sites still in active commercial or residential use – e.g., sites 74, 96, 102, 114, 129, 151;
  - Open space or allotment sites, some of which were previously discounted by the 2012 SHLAA – e.g. sites 84, 91, 109, 135;
  - Sites which are currently allocated by the 1998 Unitary Development Plan (“UDP”) but are not proposed to be allocated by the Plan – e.g. sites 112 (UDP ref. 2H7), 113 (UDP ref. 6H3).
- 2.2.19. In our view, these sites cannot be considered ‘developable’ (as per NPPF Annex 2) because there is no reasonable prospect that they will become available or could be viably developed at the point envisaged. Barratt recommends that the sites are removed from the housing trajectory and that higher, accelerated delivery on allocations (such as Site 2HA) is encouraged to help ‘plug the gap’.
- 2.2.20. By contrast, the Plan’s proposed allocations (such as Site 2HA), together with sites which have planning permission and are under construction, have much greater certainty as being considered ‘deliverable’ because they have strong evidence supporting the conclusion that they are available now, offer a suitable location for development now and are achievable with a realistic prospect that housing will be delivered within five years.

## QUESTION 10C

*Q10c. Is the evidence about delivery from stalled sites robust (see SHBC001 – PQ53)?*

- 2.2.21. In our view, the evidence about the delivery from ‘stalled sites’ is not robust.
- 2.2.22. Further to the Council’s response to PQ53 [SHBC001], there are three ‘historically stalled sites’ (HL189, RH11 and TC43) which have been kept included in the updated housing trajectory (in years 11-15), totalling 151 homes [SHBC007].
- 2.2.23. Due to a lack of evidence on progress, Barratt considers that there is no reasonable prospect that the sites are ‘developable’ from 2031/32:
- HL189 – outline permission lapsed in 2016 (ref. P/2009/1072) following an extension of time in 2013 (ref. P/2013/0185). No further applications have since been submitted and the site has various constraints;
  - RH11 – the 2012 SHLAA revealed that the site had been abandoned following the last completion in 2010/11 but estimated that it would be fully complete by 2017. However, the site is still abandoned;

- TC43 – the 2012 SHLAA revealed that 196 apartments were completed in 2007/08, but construction of the final block of 64 apartments was unviable. However, no construction has occurred on-site for more than 14 years.

2.2.24. Therefore, Barratt recommends that these sites should be removed from the housing trajectory and that higher delivery on allocations (such as Site 2HA) is encouraged to help 'plug the gap'.

### **QUESTION 10D**

*Q10d. Are the assumptions about delivery from allocations robust (discussed under Matter 4)?*

- 2.2.25. In our view, the assumptions about delivery from allocations are not robust.
- 2.2.26. Barratt can confirm that it has not been consulted by the Council in the preparation or update of the housing trajectory [SHBC007] (see Question 9). However, Barratt has concerns with SHBC007 in relation to Site 2HA (as set out within our Matter 4 statement, in response to Question 29).
- 2.2.27. In summary, Barratt is firmly of the view that there is no evidence to support the Council's conclusions that there will be a six-year delay in lead-in times to the delivery of Site 2HA as claimed in the latest housing trajectory [SHBC007]. As discussed in detail within Appendix F and G of our Matter 4 Statement [M4.5.17F, M4.5.17G], there are no barriers to Site 2HA's delivery and there are no reasons why it cannot come forward in advance of the housing trajectory.
- 2.2.28. Barratt has already undertaken initial technical and design work (which it has shared with the Council) and this does not give rise to any abnormal constraints. To the contrary, Barratt is confident that the site can yield 600 (rather than 522) homes.
- 2.2.29. Barratt is keen to work with the Council to move the site forward and has programmed in the submission of a planning application immediately upon adoption of the Plan (or sooner if a positive Inspectors' Report is received) to enable a start on-site within the immediate five year period, facilitating the delivery of much needed homes in the short to medium term.
- 2.2.30. Based on gaining planning consent in April 2022, Barratt can provide the necessary roads and site infrastructure by November 2022 and the first homes will be completed by May 2023. Thereafter, Barratt intend to 'dual outlet' the site (enabling homes to be simultaneously built and sold under both the Barratt Homes and David Wilson Homes brands) to achieve a total of 90 dpa.
- 2.2.31. To aid the Inspectors, we have reproduced the comparison of the impact of Barratt's conclusions on the housing trajectory for this site (Table 2-1). Barratt is confident that it can deliver higher completions and much sooner than the Council's assessment. Crucially it should be noted that the site can be fully built out within the Plan period (i.e. prior to 2037).
- 2.2.32. In addition, even the Economic Viability Assessment (December 2018) [VIA001] concludes that higher build out rates than would be appropriate on Site 2HA – a sales rate of five dwellings per month has been assumed, which equates to a completion rate of 60 dpa (p176-177).
- 2.2.33. Barratt therefore requests that the housing trajectory be amended in a more positive fashion by including Site 2HA as a deliverable site, which can begin to yield completions in the first five years, and then be fully built out within the Plan period.

**Table 2-1 – Site 2HA – Housing Trajectory Comparison**

Year	St.Helens Council Build Out Rates <sup>1</sup>	Barratt Homes Build Out Rates	Comparison
2021/22	0	0	0
2022/23	0	0	0
2023/24	0	45	+45
2024/25	0	90	+90
2025/26	0	90	+90
2026/27	0	90	+90
2027/28	22	90	+68
2028/29	45	90	+45
2029/30	45	90	+45
2030/31	45	15	-30
2031/32	45	0	-45
2032/33	45	0	-45
2033/34	45	0	-45
2034/35	45	0	-45
2035/36	45	0	-45
2036/37	45	0	-45
Post 2037	95	0	-95
<b>Total</b>	<b>522</b>	<b>600</b>	<b>+78</b>

## QUESTION 10E

*Q10e. Are lead in times and build out rates realistic?*

2.2.34. No, in our view lead in times and build out rates are unrealistic.

### Lead-in times

- 2.2.35. Notwithstanding that Barratt disputes the ‘standard’ lead-in times set out in SD025 and the SHLAA [HOU002], it is alarming that the Council’s has disregarded its own assumptions and has applied a more stringent six-year delay in respect of Site 2HA without evidence or justification.
- 2.2.36. We have established through our Matter 4 statement (in response to Question 28 and 29), and Question 9 and 10 above, that this assumption is unsubstantiated and therefore unrealistic.
- 2.2.37. Barratt is a willing developer who has had control of Site 2HA for over five years. Over this timeframe it has been undertaking extensive due diligence into the site’s constraints and opportunities. It has proactively engaged with key stakeholders (including utilities providers and the Council itself) to ensure that any issues are identified early on and capable of being addressed or mitigated through the site’s development. It is unsound at this late stage for the Council to attempt to delay delivery on the site without any evidence (especially when it lacks a 5YHLS).

<sup>1</sup> Updated Housing Land Supply Position (May 2021) [SHBC007]

### **Build out rates**

- 2.2.38. Neither Appendix 6 of SD025 nor the SHLAA [HOU002] provide robust justification to build out rates. For instance, the Council has not considered how the type of developer (national ‘volume’ housebuilder, versus small and medium enterprise (“SME”) builder), the type of development (apartments, greenfield, brownfield) or the number of builders (dual outlets) can influence more realistic delivery rates.
- 2.2.39. It is also disappointing that Barratt has not been consulted by the Council to verify its conclusions, despite the requirements set out in PPG (see Question 9). Notwithstanding this, the Council’s delivery rates are overly pessimistic in comparison to Barratt’s envisaged construction programme (see Question 10d), and do not recognise the intention to ‘dual outlet’ the site (Table 2-1).
- 2.2.40. By way of context, net completions in St.Helens have exceeded the proposed housing requirement (486 dpa) in all but one of the last eight years. Since the start of the Plan period in 2016/17, there has been an average of 615 net completions. In the last year alone (2020/21), 646 net completions occurred despite the impacts of Covid-19. This demonstrates that within St.Helens’ housing market, developers can collectively comfortably sustain higher delivery rates (even with existing Green Belt boundaries which are tightly drawn around settlements).
- 2.2.41. Barratt therefore requests that the build out rates in Table 2-1 be applied to the housing trajectory.

### **QUESTION 10F**

*Q10f. Is the significant spike in delivery shown in the trajectory between 2025/26 and 2026/27 realistic and supported by evidence (see SHBC001 – PQ54)?*

- 2.2.42. Barratt is aware that there is a significant ‘spike’ in delivery forecast to occur in years 2027/28 and 2028/29 of the latest housing trajectory [SHBC007]. Simplistically, this appears to have arisen from the Council concluding that a disproportionately large number of ‘developable’ sites will start to yield completions at the start of the 6-10 year period.
- 2.2.43. Site 2HA is one such site that has been classified as starting to deliver in ‘Year 6’. However, as set out above and in our Matter 4 statement, this is not realistic and is not supported by evidence. Barratt has submitted evidence to demonstrate that Site 2HA can and will yield completions within the first five years of the Plan (Table 2-1).
- 2.2.44. The Council should be required to apply more positive conclusions and agree that sites like Site 2HA could come forward in the 5YHLS to help ‘iron out’ some of the ‘spikes’ in delivery.

## **2.3 ISSUE 3: FIVE YEAR HOUSING LAND SUPPLY**

### **QUESTION 13**

*Q13. Generally, are the assumptions about the delivery from commitments, SHLAA sites and allocations within the 5-year supply realistic?*

- 2.3.1. Barratt notes that the Council itself acknowledges that it cannot demonstrate a 5YHLS – the latest stated position [SHBC007] reveals that that there is only a 4.6 year supply.
- 2.3.2. In our view, the actual supply position is likely to be much lower, but Site 2HA can help ‘plug the gap’ as there is strong evidence to conclude that it is deliverable (see Question 9 and 10).

2.3.3. Therefore, the Plan is **not positively prepared, justified, effective or consistent with national policy** in this regard.

#### **QUESTION 14**

*Q14. Are lead in times and build out rates within the 5-year supply realistic?*

2.3.4. No. Please see our response to Question 10e.

#### **QUESTION 17**

*Q17. Will Policy LPA05 as worded be effective in maintaining delivery through the Plan period?*

2.3.5. In our view, the wording 4 of Policy LPA05 as submitted is **not effective** in maintaining delivery through the Plan period.

2.3.6. Barratt considers that the wording of part 4(b) of LPA05 is not specific enough about what will trigger action or, crucially, what action(s) will then be taken and by when:

- Firstly, the Policy should be amended to elaborate on how the Council quantify falling *“significantly below the required level”* of housing delivery;
- Secondly, the Policy should also be amended to ensure that the Plan can take action in such a scenario (i.e. bringing forward additional sites) without having to wait for a *“partial or full plan review”* to be *“considered”*.

2.3.7. The amendments would provide clarity to developers and to the wider community alike and are necessary for soundness. Barratt considers that this should be dealt with through a MM.



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