

St Helens Local Plan 2020-2035 Examination in Public

Hearing Statement on behalf of Story Homes

Matter 5 – Housing Land Supply

May 2021

Relevant Site:

Land south of A580 between Houghtons Lane and Crantock Grove, Windle (Ref: 8HS)

Representor ID: RO1954

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Appendix A
Story Homes Housing Supply Analysis

1 Introduction

- 1.1 This Statement has been prepared by Hive Land & Planning on behalf of Story Homes and responds to the Matters, Issues and Questions released by the Inspectors on 30th March 2021. In this submission Story Homes are responding to **Matter 5**. This Matter 5 Statement is accompanied by **Appendix A – Housing Supply Analysis**, which should be read alongside the responses to the Inspectors' Matters, Issues and Questions.
- 1.2 The involvement of Story Homes in the St Helens Local Plan Examination relates to the continued promotion of the Land south of A580 between Houghtons Lane and Crantock Grove, Windle, Ref 8HS (hereafter referred to as 'Site 8HS'). Story Homes has promoted Site 8HS for the residential development of around 1,100 dwellings and has been undertaken following agreement with the landowners to secure a contractual position on the site.
- 1.3 Site 8HS is currently located within the Green Belt and has been identified as a Safeguarded Site within the Submission Draft St Helens Local Plan 2020 -2035, to be reserved for future residential development until after the plan period, unless a subsequent Local Plan Review proposes to allocate the land for development. In safeguarding Site 8HS, the Council has recognised that Site 8HS represents a suitable and sustainable location for housing and Story Homes welcome and support this recognition.
- 1.4 In the 2016 Preferred Options Draft of the Local Plan however, Site 8HS was identified as a Housing Allocation to come forward within the current Plan Period. This further confirms the Council's acceptance that Site 8HS, as a matter of principle, is a suitable location in which to locate this scale of new housing.
- 1.5 The Council has therefore acknowledged the acceptability of Site 8HS for residential development at every stage of the plan-making process.
- 1.6 This Hearing Statement should be read in conjunction with all the statements being submitted by Story Homes in response to **Matters 1, 2, 3, 4, 7, 10 and 11**.
- 1.7 We trust that this Statement assists the Inspectors in respect of the Examination.

2 Matter 5 – Housing Land Supply

Issue 1: Components of Housing Supply

Question 1. Having regard to the Council's responses referred to above, will the up to date housing supply position be clearly shown in the Plan (base date of 31 March 2021)?

- 2.1 Story Homes consider that Appendix 2 of **SHBC007** – Updated Employment and Housing Land Supply Information Document (May 2021) and Table 5.5 contained within Annex 3 to the Schedule of Modifications (May 2021), proposed by MM007 to update Table 4.6 in the Plan, sets out the Council's claimed up to date housing supply position, as outlined in their response to the Inspectors' preliminary questions with a base date of 31 March 2021. However, as set out below in Issue 2, Story Homes do not agree with the analysis and stated outcome of the Council's housing supply position.

Question 2. Having regard to the Council's responses referred to above, will the components of the housing supply that will meet the housing requirement be clearly shown in the Plan?

- 2.2 Story Homes consider that **SHBC007** – Updated Employment and Housing Land Supply Information Document (May 2021) and Tables 5.3 & 5.4, contained within Annex 3 of the Schedule of Modifications (May 2021), proposed by MM007 to update Table 4.6 in the Plan, sets out the components of the housing supply that will meet the housing requirements. However, as set out below in Issue 2, Story Homes do not agree with the analysis and stated outcome of the Council's housing supply position.

Question 3. Is the small sites allowance of 93 dpa justified by compelling evidence (see paras 4.10 to 4.13 of SD025)?

- 2.3 As the Inspectors points out, Paragraphs 4.10 – 4.13 of SD025 provides the rationale for including a Small Sites (sites smaller than 0.25ha) allowance of 93 dpa. Paragraph 70 of the National Planning Policy Framework (NPPF) requires 'compelling evidence' that sites will provide a reliable source of supply is required to include windfall sites as part of anticipated supply.
- 2.4 The Council has provided evidence of small sites completion rates over the last ten years, of which the average rate is 103dpa. The Council notes in paragraph 4.10 that years 2018/19 provided a particularly

high number of small sites due to a high number of apartment schemes. It is considered likely that this trend will continue across the remainder of the Plan period.

- 2.5 Therefore Story Homes considers that a small sites allowance, of sites smaller than 0.25ha, of 93dpa is supported by adequate evidence.

Question 4. 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?

- 2.6 The 2017 Strategic Housing Land Availability Assessment ('SHLAA'), Examination document reference HOU002, states at Paragraphs 5.7-5.9 that the SHLAA's anticipated yield are estimated on a net basis rather than a gross basis. An annual allowance for demolitions may result in some duplication of that adjustment factor.

Question 5. Should empty homes be included as a component of supply?

- 2.7 Paragraph 4.18.17 of the Submission Draft of the Plan states that although bringing empty homes back in to use contributes to meeting housing needs, due to the limited control of the Council to influence this, the contribution is not counted towards the housing supply figures in Table 4.6.
- 2.8 Planning Practice Guidance states that "*to be included as a contribution to completions it would be for the authority to ensure that empty homes had not already been counted as part of the existing stock of dwellings to avoid double counting*"¹.
- 2.9 Therefore, Story Homes agree with the Council that empty homes should not be included as a component of supply to avoid double counting and this is in accordance with Planning Practice Guidance.

Question 6. Does the Plan show sufficient flexibility in the supply to ensure that the housing requirement will be met over the Plan period (the Council's latest figures show a residual requirement of 7778 units and potential housing supply of 8384 units assuming a Plan period until 2037)?

- 2.10 The Council's most up to date figures, included within Appendix 2 of SHBC007 – Updated Employment and Housing Land Supply Information Document (May 2021), indicate that the Council has a residual requirement of 7132 units and potential housing supply of 7831. According to the Council's figures, this

¹ Paragraph 030, Ref ID: 68-030-20190722, Housing supply and delivery PPG.

flexibility results in a potential oversupply of 699 dwellings. Considering the Council's annual housing requirement figure of 482 dpa, 699 units is equivalent to approximately 1.45 years of supply or a buffer of 7.7%. 699 units spread across the remainder of the Plan period would result in approximately 44 units additional per year.

2.11 Paragraphs 11a and b of the NPPF states (with our emphasis):

'a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area;

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.

2.12 As Story Homes' Matter 3 Statement outlines, exceptional circumstances exist to release land from the Green Belt, thereby not providing a strong reason to restrict development. The Government is clear that its objective is "significantly boosting the supply of homes"² and whilst St Helens do commit to a housing requirement which exceeds its objectively assessed need, Story Homes do not consider the Plan to be sufficiently flexible to adapt to rapid change.

2.13 Story Homes consider that the 15% reduction in SHLAA capacity for years 6-16 of the Plan period for non-delivery (referred to after this point as a 'lapse rate') is not providing flexibility but rather being realistic about the proportion of SHLAA sites that will be developed across the Plan period. The Council's strategy to maximise housing delivery on previously developed ('brownfield') land within existing urban areas (to foster urban regeneration) further exacerbates this issue and this is exemplified by virtue of the fact that the Council cannot currently demonstrate a five year housing land supply. The Council itself states that the Green Belt increased allowance will help ensure a flexible and deliverable supply can be maintained given the "inherent uncertainty" associated with the development of some of the brownfield land sites and

² Paragraph 55, National Planning Policy Framework

market uncertainty associated with COVID19³. Therefore, the Council admits that brownfield sites are not a reliable source of supply and acknowledge the need to provide for flexibility.

2.14 Notwithstanding the comments above, Story Homes Housing Land Supply Analysis (see Appendix A to this Matter 5 Statement), demonstrates that the Council could face a shortfall across the Plan period of 2846 dwellings, taking in to account the reduction in the Council’s claimed housing land supply position and the necessary increase to the housing requirement. As Story Homes’ Matter 2 Statement and Story Homes Housing Land Supply Analysis at Appendix A explains, it is considered that the annual housing requirement should be around 570 dpa resulting in a residual requirement of 8896 dwellings over the remaining plan period (accepting the completions already accounted for from 2016/17 to 2020/21). Story Homes analysed the supply evidence provided by the Council and discounted a number of sites or revised site trajectories. Overall, we conclude that the potential shortfall between the required Green Belt capacity and capacity of allocated Green Belt sites is 2846 dwellings (see Table 4).

Table 4 - Story Homes’ Shortfall Analysis (with housing requirement adjustment to 570 dpa)

Overall required capacity of sites to be removed from the Green Belt (Table 5.4)	4775
Story Homes’ Total Plan period capacity of allocated sites removed from the Green Belt (sites 1HA, 2HA, 4HA, 5HA, 7HA and 8HA) (Table 5.4)	1929
ANTICIPATED SHORTFALL	2846

2.15 Even without an adjustment to the housing requirement, Story Homes conclude that the Council may face a shortfall of 985 dwellings (see Table 5) due to being over optimistic in relation to their supply from non-Green Belt sites and Green Belt allocations. As outlined below, Story Homes’ site (8HS) at Windle should be allocated to help make up this shortfall in supply.

Table 5 – Story Homes’ Shortfall Analysis (without housing requirement adjustment, maintaining 486 dpa)

SHBC’s Total Housing Supply over Plan period (Table 5.5)	7831
Story Homes’ Housing Supply over Plan period (Table 5.5)	6846
ANTICIPATED SHORTFALL	985

³ Paragraph 4.33 – SD025 Housing Need and Supply Background Paper (October 2020)

- 2.16 The question marks arising from the Council's claimed housing supply position and the need for this discount to be applied are further reinforced by the fact that the Council cannot currently demonstrate a Five Year Housing Land Supply⁴.
- 2.17 As Story Homes' Matter 3 Statement outlines, we do not consider that the Plan has identified sufficient land for release from the Green Belt to meet housing needs. As such, land currently proposed to be safeguarded (specifically, Site 8HS which was identified as a Housing Allocation at the Preferred Options stage) should be identified as a housing allocation, or at the very least a 'Plan B' site to be brought forward early should the Council continue to not be able to demonstrate a Five Year Housing Land Supply. This is an approach that was endorsed by the Inspector conducting the Examination into the now adopted West Lancashire Local Plan, as set out within our Matter 3 Hearing Statement.

Question 7. Is the flexibility in housing supply provided by the Green Belt sites justified?

- 2.18 Story Homes welcome the contribution that Green Belt sites make towards the flexibility in St Helen's housing supply.
- 2.19 A 20% increased allowance for Green Belt required capacity was added in Table 5.4⁵, which is stated to allow for contingencies such as "infrastructure provision, delays, lead-in times to start of housing delivery etc.". The Council states that this increased allowance will help ensure a flexible and deliverable supply can be maintained given the "inherent uncertainty" associated with the development of some of the brownfield land sites and market uncertainty associated with COVID19⁶. In principle, Story Homes agree that a 20% increased allowance is sensible.
- 2.20 This is not least due to the fact that the spatial distribution of SHLAA sites (towards town centre and inner urban sites) will not result in a sustainable pattern of development that meets all identified housing needs across the Borough, such as affordable and family housing. As demonstrated within **SHBC011**, development is heavily skewed towards the town centre and other urban wards. This could result in reduced contributions towards wider infrastructure provision due to viability issues associated with

⁴ SHBC007 Appendix 2 indicates the Council can demonstrate a 4.6 year supply.

⁵ Table 5.4, Appendix 3: Update of Table 4.6 of the LPSD, **SHBC007** – Updated Employment and Housing Land Supply Information Document (May 2021)

⁶ Paragraph 4.33 – SD025 Housing Need and Supply Background Paper (October 2020)

developing brownfield sites in inner St Helens. Furthermore, most SHLAA sites are brownfield located within affordable housing zones 1 and 2 and so will not be required to contribute towards affordable housing within the Borough (Policy LPC02), which will result in a shortfall in affordable housing delivery against the 117 affordable dpa requirement identified in the SHMA.

- 2.21 As set out above, a significant adjustment is needed to the Council's claimed housing land supply position and housing requirement which will result in a shortfall of 2846 dwellings over the plan period and so the flexibility of the resulting 699 dwellings above the residual requirement is not considered sufficient to ensure St Helens can adapt to rapid change or ensure that the new Green Belt boundaries can endure beyond the Plan period.
- 2.22 Additional Green Belt sites such as Site 8HS should be allocated to increase the flexibility provided by this source of housing land supply.

Question 8. Would greater certainty be provided within the Plan if SHLAA sites (or the larger sites) were to be allocated (see SHBC001 – PQ52)?

- 2.23 Story Homes agrees with the Council that all SHLAA sites do not need to be allocated in the Plan. However, as the Council's answer to PQ52 indicates, SHLAA sites over 300 units that had not commenced at the time of publication of the 2017 SHLAA are proposed to be allocated in the Plan.
- 2.24 Allocating additional SHLAA sites in the Plan is considered unnecessary, as sites without planning permission identified in the SHLAA are included within proposed Policy LPA05 as a component of the Council's housing supply. Therefore, if the sites are deliverable, planning applications will be submitted and approved in accordance with Section 38(6) of the Planning & Compulsory Purchase Act 2004, as the proposals will be in accordance with the Development Plan (once the St Helens Borough Local Plan 2020-2035 is adopted). No further certainty would be gained by allocating the sites and it is not necessary to ensure the Plan's soundness.

Issue 2: The Housing Trajectory

- 2.25 Figure 4.3 will be further amended by **SHBC007** – Updated Employment and Housing Land Supply Information Document (May 2021). Story Homes have analysed the evidence that supports the housing trajectory and refer the Inspectors to Appendix A.

2.26 Story Homes' in-depth analysis considers: **SHBC007**; the Council's updated evidence contained within **SHBC004** – Further evidence on Housing supply, including updated SHLAA Site Assessments (February 2021) and Story Homes' previous SHLAA assessment comments. Appendix A discounts a number of sites as either undeliverable or undevelopable. Sites were discounted in Story Homes' analysis for reasons including:

- a. Evidence to suggest long term lack of developer interest;
- b. Specific site constraints considered to render a site unviable to develop e.g. multiple ownerships, landlocked, mature trees;
- c. Sites being in continuous active alternative uses;
- d. Small sites being excluded from outline development phasing plans;
- e. Lack of evidence to demonstrate historically stalled sites are developable;
- f. Type of site – amenity or valuable open/green space.

2.27 Story Homes' response to Questions 10b and 10c below provide examples to demonstrate the methodology above. Therefore, due to the fact that a number of sites have been discounted from the Council's analysis, Story Homes do not consider that the evidence that supports the trajectory, in terms of the SHLAA supply, is based on realistic assumptions.

2.28 Story Homes do not however challenge the Council's typical build out rates and lead in times assumed for the site allocations, as outlined further in our response to Question 14 below.

2.29 Furthermore, the Council can only demonstrate 4.6 years supply of deliverable housing land. Not being able to demonstrate 5 years supply of deliverable housing land at the outset of a Plan period demonstrates the necessity to allocate further Green Belt sites, such as Site 8HS, for development over the Plan period to ensure the housing requirement is met, as a minimum.

Question 10. In particular:

- a. *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)?*

2.30 The Council indicated in their answer to PQ50 that a lapse rate had not been included for sites expected to deliver within the next 5 years as those sites are considered deliverable.

2.31 Story Homes analysis provided at Appendix A makes appropriate adjustments to any sites included within the 0-5 years supply. This was either through the site being discounted completely, or by moving the trajectory to Years 6-15. The Council then apply a lapse rate to SHLAA sites falling within years 6-15. Story Homes agree with this general approach and it is just the assumptions reached in respect of the deliverability and developability of individual sites where there is a remaining dispute.

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

2.32 See also the response to Question 9. Story Homes do not consider the evidence relating to the delivery of SHLAA sites outlined above is robust. As demonstrated by the analysis in Appendix A, the Council has not provided sufficient evidence to rely upon a number of sites as part of its SHLAA supply as developable sites.

2.33 For example, the Council has included site HL525 within its SHBC004 update, stating:

“No change. Site has outline planning permission and demolition of some buildings commenced in 2017”.

2.34 This evidence ignores the fact that the planning permission required that a reserved matters application had to be made within three years of the outline planning permission. No such applications for reserved matters approval have been made according to the Council’s website. The permission has therefore lapsed and 90 units will not be delivered within 0-5 years as the SHLAA indicates.

2.35 In addition, Site 59 is included within the SHLAA with an indicative capacity of 13 dwellings. The Council provided no updated evidence in their SHLAA proforma updates in SHBC004. Considering the site was included within the 2012 SHLAA as deliverable within 0-5 years, there is no more recent evidence of developer interest and due to the specific constraints of the site, Story Homes discounted the site from the SHLAA developable total. Appendix A provides full details of the robust analysis that has been carried out by Story Homes to justify the stance being taken within this Hearing Statement.

2.36 In total, **Story Homes have applied discounts to the Council’s claimed housing yield in respect of 30 SHLAA sites.** Table 1.2 of Appendix A to this Hearing Statement provides details of these ‘Disputed Sites’ and the evidence Story Homes has provided to justify the discount in respect of each discounted site.

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

2.37 The Council's response to PQ53 states that each stalled site is considered developable as they have each stalled for unique site specific reasons, furthermore discussions with landowners and stakeholders has informed delivery assumptions. Yet very little has been provided by way of robust and tangible evidence. Story Homes therefore consider that this is not robust evidence and so appropriate discounts have been applied to SHLAA sites within our analysis at Appendix A where this applies.

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

2.38 Please refer to our response to Question 14 within this Statement regarding the assumptions made around build out rates and lead in times for developable sites, which Story Homes do not dispute.

2.39 Story Homes Housing Supply Analysis does however recommend removing 91 units from the trajectory of site 7HA and 58 dwellings from site 9HA. Please refer to Table 1 at Appendix A which provides the evidence and rationale for these discounts.

e. Are lead in times and build out rates realistic?

2.40 Please refer to our response to Question 14 within this Statement. Story Homes raise no objection in respect of the lead in times and build out rates as a matter of principle.

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

2.41 Story Homes have no specific comments on these two years of the housing trajectory, other than to make the point that ultimately the housing market will dictate the rate at which new development will come forward and so there will inevitably be variations to the housing trajectory. Ultimately, as there is still 10 years to run in respect of the plan period after these two years, the vast majority of these sites will be completed by 2037 and so in respect of housing land supply throughout the plan period, there is no change to the overall position, except where site have been discounted within our analysis at Appendix A.

Issue 3: Five Year Housing Land Supply

Question 11. Is the use of a 5% buffer to calculate the housing land supply position appropriate?

2.42 The Council's Updated Employment and Housing Land Supply Information Document (May 2021) indicates that the Council will apply a 5% buffer to the housing requirement for the first five year period of the plan. The document also confirms that the Council have 4.6 years of housing land supply. It is not clear whether the Council wishes to confirm a five year supply of deliverable sites through a recently adopted plan. Therefore, it is not clear whether the Council should apply a 5% or 10% buffer as their preference has not been stated.

Question 12. Is the inclusion of 465 units from small sites in the 5-year supply justified?

2.43 As per Story Homes' response to Question 3 set out within this statement, it is agreed that a small sites allowance of 93 units per annum is justified based on the evidence of delivery rates from this source over the last 10 years, which is slightly lower than the mean average of 103 dpa over the last ten years due to the Council having a couple of unusually high levels of completions on small sites. Therefore, the inclusion of 465 units to be provided on small sites within the 5 year supply is justified.

Question 13. Generally, are the assumptions about the delivery from commitments, SHLAA sites and allocations within the 5-year supply realistic?

2.44 Story consider that these assumptions are not realistic. Please refer to our response to Question 6 and the Story Homes Housing Supply Analysis provided at Appendix A.

Question 14. Are lead in times and build out rates within the 5-year supply realistic?

2.45 The lead in times and build out rates are set out within paragraphs 4.20 and 4.21 of the Council's Housing Need and Supply Background Paper published in October 2020 (ref: S025). Story Homes agrees these assumptions are realistic, however these assumptions should take account of site specific requirements on a case by case basis. Appendix A to this Statement assesses each of the sites within the Council's latest supply and applies these assumptions but accounts for site specific requirements, such as need for up-front infrastructure and remediation works, which are often required for brownfield sites.

Question 15. Are there any measures that the Council can take to provide more elbow room in terms of the 5-year supply? Note - SHBC001 – PQ55 refers to the possibility of a stepped housing requirement and/or increasing the small sites allowance.

- 2.46 The Council's response to PQ55 in document SHBC001 suggests the small sites allowance could be increased to 103 units per annum highlighted by the evidence provided within paragraph 4.10 of SD0025. The average of 93 units on small sites is calculated from monitoring period 2007/08 to 2016/17 where there was an average of 93 units complete per annum on small sites. The updated evidence provides an average from 2010/11 to 2019/20, with 2018/19 reporting 196 units completed and 2019/20 reporting 57 units completed resulting in an average of 103 units per annum.
- 2.47 Story Homes disagree with this approach being an option as this increased delivery rate on small sites is heavily inflated by completions in 2018/19 (196 units per annum), whilst in 2019/20 only 57 were complete which indicates a broad ranging completion rate from this source. Furthermore, increasing the small sites allowance to that suggested, would only result in an increase of 50 units included within the 5 year supply. This would only yield a revised calculation of 4.7 years of supply based on the Council's assumptions set out within Appendix 2 of SHBC007. Finally, increasing the anticipated number of units to be delivered on small sites reduces the possibility for the Council to deliver strategic, well-planned housing growth more likely to provide higher developer contributions towards wider infrastructure needs and the delivery of affordable housing.
- 2.48 A stepped housing requirement is also suggested within the Council's response to PQ55. However, as set out within Table 1 of the Appendix attached to this Statement, Story Homes consider that the Council have made unrealistic assumptions about a number of SHLAA sites included within the supply. Furthermore, our Matter 2 Statement outlines the reasons why the housing requirement should be increased to 570 units per annum.
- 2.49 Story Homes consider that the only measure the Council could take is to allocate the most suitable sites currently proposed to be safeguarded for future housing development. On this basis, Site 8HS should be identified as a Housing Allocation, which would allow for sufficient flexibility to be achieved as first completions are anticipated in 2022/23 (as per the Infrastructure Delivery Statement provided at Appendix

A to our Matter 4 Statement), which would make a positive contribution towards the Council's five year housing land supply position.

Question 16. Will there be a five-year supply of deliverable housing sites on adoption of the LP?

2.50 No, the Council have confirmed that they can only demonstrate 4.6 years of housing land within their most recent housing supply calculations set out within document SHBC007. Story Homes agree that the Council cannot demonstrate 5 years of housing land upon the adoption of the Local Plan and that the presumption in favour of sustainable development would apply.

Issue 4: The wording of Policy LPA05

Question 17. Will Policy LPA05 as worded be effective in maintaining delivery through the Plan period?

2.51 Given that the Council cannot currently demonstrate a five year supply of housing land, Policy LPA05 is crucial to ensure a plan-led approach for housing growth upon the adoption of the Plan. Therefore, Story Homes propose the following amendment to this policy (suggested modifications shown in italics):

1. An additional source of supply should be added after 2(e);;

f) Safeguarded land brought forward for development during the plan period should the Council not be able to demonstrate a deliverable 5 year supply of housing land

2. Point 4(b) should also state that where the deliverable housing land supply falls below the required level, development on specifically identified safeguarded land sites such as Site 8HS will be supported and prioritised over other sites to increase housing supply ("Plan B" sites – see Story Homes' Matter 3 Statement) without the need for a Local Plan review:

b) there is a deliverable supply of housing that is sufficient to provide at least 5 years' worth of new housing development against the housing requirement. The 5 year land supply to be maintained shall include any buffer that is required under national policy. If annual monitoring demonstrates the deliverable housing land supply falls significantly below the required level, development on 'Plan B' (or reserve) safeguarded land sites will be supported and prioritised over other sites to increase the supply without the need

for a partial or full plan review. a partial or full plan review will be considered to bring forward additional sites.

2.52 The amendment to the approach (and wording) of this policy will then ensure that the Council can adopt a flexible approach in respect of maintaining a five year housing land supply throughout the plan period, without the need to consider further revisions to the Green Belt boundary as part of a subsequent Local Plan review.

Appendix A
Story Homes Housing Land Supply Analysis (May 2021)



Story Homes Housing Supply Analysis

St Helens Local Plan Examination

May 2021

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1. Introduction

- 1.1 This Appendix 1 relates to Story Homes' **Matter 5 Hearing Statement**. This appendix, and the Statement, has been prepared by Hive Land & Planning on behalf of Story Homes.
- 1.2 The involvement of Story Homes in the St Helens Local Plan Examination relates to the continued promotion of the Land south of A580 between Houghtons Lane and Crantock Grove, Windle, Ref 8HS (hereafter referred to as Site 8HS). Story Homes has promoted Site 8HS for the residential development of around 1,100 dwellings throughout the Local Plan preparation process. This promotion has been undertaken following an agreement with the landowners.
- 1.3 Site 8HS is currently located within the Green Belt and has been identified as a Safeguarded Site within the Submission Draft St Helens Local Plan 2020 -2035, to be reserved for future residential development until after the plan period, unless a subsequent Local Plan Review proposes to allocate the land for development. In safeguarding Site 8HS, the Council has recognised that Site 8HS represents a suitable and sustainable location for housing and Story Homes welcome and support this recognition.
- 1.4 In the 2016 Preferred Options Draft of the Local Plan however, Site 8HS was identified as a Housing Allocation to come forward within the current Plan Period. This further confirms the Council's acceptance that Site 8HS, as a matter of principle, is a suitable location in which to locate this scale of new housing.
- 1.5 The Council has therefore acknowledged the acceptability of Site 8HS for residential development at every stage of the plan-making process.
- 1.6 This Appendix and the Hearing Statement which it supports should be read in conjunction with all the statements being submitted by Story Homes in response to other Matters outlined by the Inspectors.
- 1.7 We trust that this Appendix assists the Inspectors in respect of the Examination.
- 1.8 The remainder of this appendix is structured as follows:

Section 2: Methodology

Section 3: Conclusions

Section 4: Analysis Tables

2. Methodology

- 2.1 This Section relates to the methodology, used by Hive Land & Planning on behalf of Story Homes, to analyse St Helens Borough Council's (SHBC's) Housing Supply.
- 2.2 Draft Policy LPA05: Meeting St Helens Borough's Housing Needs of the emerging *St Helens Local Plan 2020-2035*, Hive Land & Planning's Matter 2 Statement and SHBC007 – Updated Employment and Housing Land Supply Information Document (May 2021) provide the starting point for the analysis that follows in this Appendix A.
- 2.3 Other documents referred to include:
- a. **SHBC004** – Further evidence on Housing Supply, including updated SHLAA Site Assessments
 - b. **SD025** - Housing Need and Supply Background Paper, October 2020
 - c. **SHBC005** – Response to Inspectors' Preliminary questions on Site Allocations and Safeguarded Land
 - d. **HOU002** – St Helens Strategic Housing Land Availability Assessment (SHLAA)
- 2.4 **Draft Policy LPA05** sets out the housing requirement for the Borough of St Helens and outlines the sources from which the growth will be met. The relevant section of the draft policy is reproduced here:

Extract from proposed Policy LPA05: Meeting St. Helens Borough's Housing Needs

1. In the period from 1 April 2016 to 31 March 2035 a minimum of 9,234 net additional dwellings should be provided in the Borough of St.Helens, at an average of at least 486 dwellings per annum.

2. The housing requirement will be met from the following sources:

a) Completions;

b) Sites with planning permission;

c) Housing allocations shown on the Policies Map and listed in Table 4.5;

d) Sites without planning permission identified in the Strategic Housing Land Availability Assessment (SHLAA); and

e) 'Windfall' development, including development on small sites not individually identified in the SHLAA, sub-division of dwellings and conversions / changes of use

- 2.5 St Helens Borough Council have provided an **Updated Employment and Housing Land Supply Position as of 31.03.2021 (Examination Document SHBC007)**. The document provides an update on the sources of the supply of the housing requirement (Para 2 of LPA05).
- 2.6 Story Homes' **Tables 2 and 3**, included within this document correspond to SHBC's Housing Trajectory (as of 31.03.2021), including an update to all 2017 SHLAA sites and any new sites with planning permission, which is contained within **Appendix 1 of SHBC007**. Tables 2 and 3 also include reference to previous analysis undertaken by Story Homes in 2019 and **SHBC004**, which provided updated SHLAA proformas and a housing trajectory (dated February 2021).
- 2.7 **Appendix 3 of SHBC007** updates and simplifies **Table 4.6** (Housing land requirements and supply – 2016 until 2035) of the Local Plan Submission Draft. **SHBC007** also extends the Plan Period to 2037, in accordance with **ISNP006**. Story Homes' **Table 4** corresponds directly to Appendix 3 of SHBC007.

Housing requirement

- 2.8 We refer the Inspectors to Hive Land & Planning's **Matter 2 Statement**, which concludes that St Helens should be planning for a minimum of around 570 dwellings per annum.
- 2.9 This annual housing requirement provides the starting point for Story Homes' analysis.

Completions

- 2.10 Story Homes' analysis accepts SHBC's reported net completions from 1 April 2016 – 31 March 2021.

Housing Allocations

2.11 Story Homes have analysed the Council's Local Plan allocations and their associated trajectories in Tables 2 and 3 below.

SHLAA Capacity

2.12 SHBC's total SHLAA capacity consists of sites both with and without planning permission. SHBC's SHLAA capacity is set out in **SHBC007 - Updated Employment and Housing Land Supply Information Document (May 2021)**.

2.13 Updated SHLAA proformas, providing updated evidence supporting SHLAA sites were provided by SHBC in **SHBC004 – Further evidence on Housing Supply, including updated SHLAA Site Assessments**.

2.14 It should be noted that Story Homes' analysis discounts a number of sites that SHBC considers are 'developable' and discounts them from the analysis of the Housing supply. As per the NPPF definition of 'developable', sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

2.15 Hive Land & Planning have extensively researched the SHLAA sites and analysed each site individually upon its merits and concluded each site's developability, in our professional opinion. Tables 1.1 and 1.2 provide a summary of the discounted sites.

"Windfall" Development

2.16 SHBC identifies a "small sites allowance" of 93 dwellings per annum. Story Homes are satisfied that Table 4.4 of **SD025 - Housing Need and Supply Background Paper, October 2020** provides sufficient evidence that the contribution made by small sites previously is likely to continue.

2.17 Story Homes' analysis therefore allows for a 93 dpa small sites allowance, in accordance with SHBC's calculations.

Lapse Rates

2.18 SHBC's trajectory includes a 15% SHLAA capacity reduction to account for non-delivery. This reduction is applied to sites anticipated to deliver housing between years 6-16 of the Plan period. Story Homes has applied the same allowance within our analysis below.

Green Belt Capacity Increase

- 2.19 SHBC's trajectory includes a 20% increase in allowance to be added to Green Belt sites, which Appendix 3 of **SHBC007** states is to "allow for contingencies e.g. infrastructure provision, delays, lead-in times to start of housing delivery etc".
- 2.20 Story Homes has applied the same 20% increased capacity allowance within our analysis in Table 4 below.

3. Conclusion and Recommendations

- 3.1 Story Homes' analysis in the Tables below have resulted in the final shortfall calculation of 2,846 dwellings, shown in **Table 5**.
- 3.2 The comments in Table 4, read alongside Section 2 above, explain the methodology, assumptions and calculations undertaken to arrive at the 2,846 dwelling shortfall figure.
- 3.3 In short, Story Homes' Matter 2 Statement calculates a revised housing requirement figure of 570 dwellings per annum. Story Homes have also analysed the SHLAA sites trajectory (**SHBC007**), relied upon by SHBC as a component of their housing supply. The analysis, contained predominantly within Table 3 below, demonstrates that a number of the sites relied upon by the Council should be discounted as contributions towards the requirement.
- 3.4 The analysis in Table 4 outlines Story Homes' commentary upon SHBC's methodology and calculations and provides reasoning for any deviations from SHBC's analysis.
- 3.5 This higher housing requirement, coupled with the discounted SHLAA supply, has resulted a shortfall of 2,846 dwellings over the Plan period.
- 3.6 As the SHLAA provides an indication of developable housing sites, it is assumed that there remains no further supply of sites suitable for development that are likely to come forward within the Plan period.
- 3.7 Therefore, the shortfall should be met by the allocation of further Green Belt land, currently proposed to be safeguarded for development beyond the Plan period. Land south of A580 between Houghtons Lane and Crantock Grove, Windle (Site 8HS) can make a significant contribution towards addressing such a shortfall. Story Homes are promoting the site for development of around 1,100 dwellings.
- 3.8 In conclusion, the analysis outlined within this Appendix A to Story Homes' Matter 5 Hearing Statement, has clearly demonstrated that SHBC has a shortfall of housing supply across the Plan period, to 2037. Therefore, it is essential to allocate further sites in the Green Belt for development at this stage in order to ensure that housing needs will be met within the plan period.

4. Analysis Tables

Table 1 – Disputed Sites Summary

Table 1.1 – Disputed Site Allocations

Ref	Site Name	Land Type	Size (ha)	Council Total (Plan Period)	Discount Applied	Story Homes Total (Plan Period)	Reason for discount applied
7HA	Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line, Newton-le-Willows			181	-91	90	An application was submitted in December 2020 (P/2021/0028/FUL) for the redevelopment of the Red Bank Education Unit on the site. The application was submitted by St Helens Council and although the Planning Policy Officer objected to the proposed development, it would result in a reduced capacity for housing on the site. In addition, this is likely to cause delays to developing the remaining land as residential. Do not agree that 20 units are deliverable within 0-5 years.
9HA	Land north of Elton Head Road			352	-58	294	Reserved Matters application by Bloor Homes for 294 homes validated 23/04/21 (P/2021/0405/RES). Unlikely that the outline capacity of the site will be realised. Trajectory reduced to 294 dwellings to match reserved matters application.

Table 1.2 – Disputed SHLAA Sites

Ref	Site Name	Land Type	Size (ha)	Council Total (Plan Period)	Discount Applied	Story Homes Total (Plan Period)	Reason for discount applied
19	Leyland Green Road	Gr	0.53	9	-1	8	Planning permission has been granted for 8 dwellings (reference: P/2020/0478/FUL).
31	Former Sutton Arms PH, Elephant Lane	Br	0.35	18	-18	0	This site was discounted due to the size of the site and the potential issues associated with its development, such as the presence of ground contamination issues, it is likely that the site may not be viable. As there has been no clear evidence of developer interest, in the form of a planning application, for the site since the site's inclusion within the SHLAA 2017, it is concluded that the site is not likely to be developable.
59	Site of former 56-100 Eccleston Street	Br	0.33	13	-13	0	The 2012 SHLAA noted that the site is a cleared former housing site with a prominent frontage along a busy route into the town centre. It was expected to be disposed of within 0-5 years yet there is no evidence of developer interest since then nor planning history on the site. The net developable area is constrained by the shape of the site and presence of mature trees. The land also has value as amenity greenspace in an otherwise built up area. Given these constraints it is not considered there is a reasonable prospect of the site being delivered within the Plan period.
60	Vacant land adjacent to Rail Line, Elephant Lane	PDL/Gf	4.33	112	-112	0	The site is a former allotments and quarry site which has become overgrown with mature trees. The site has a number of constraints, including potential ground contamination issues surrounding its former use as a quarry, noise issues and potential access issues. Such technical issues require further investigation and may impact the site's viability. There has also been no evidence of developer interest since the 2017 SHLAA. Therefore, it is considered that the site does not have a reasonable likelihood of being developed within the plan period.
63	Land at Waterdale Crescent	PDL/ Gf	0.26	10	-10	0	The site has value as an amenity greenspace, which has been considered a constraint to development. The Council has provided no evidence of developer interest in the site and it has not been developed within the 5 years anticipated by the 2012 SHLAA. It is therefore discounted as unlikely to be developed within the Plan period due to the site's specific constraints.
64	BT Depot, Sutton Road	Br	1.02	36	-36	0	The site is still in active use and although it is included within the hybrid consent for wider Moss Nook site, previous phasing plans included it as a 'possible' phase 3. Harworth, the wider site landowner, has re-discharged the condition requiring an indicative phasing plan, which does not include the site (ref - C/2020/0084/CON). The approved spine road, now under construction, does not include a bell mouth to the site – it could be accessed from Sutton Road but the approved spine road layout does not indicate an intention to integrate the site in to the wider development. Therefore, it is concluded that the prospect of residential development on the site within the Plan period is unlikely.
65	Former Pumping Station, Station Road	Br	0.27	10	-10	0	As above, excluded from wider landowner Harworth's discharge of condition phasing plan (ref - C/2020/0084/CON), and also not included within Taylor Wimpey's Phase 1 development layout. Site does not appear to be in an alternative use however the remediation and demolition costs may render the small site unviable. Unlikely the site will be developed within the Plan period.
82	Land adjacent Laffak Road and Carr Mill Road	PDL/Gf	3.31	150	-51	99	There is a live application for 150 residential units, awaiting decision (reference: P/2020/0153/FUL). However, there has been no progress has been made on the planning application since May 2020. The planning application demonstrates developer interest but as a previous application had to be withdrawn due to issues such as flood risk, landscaping and acoustic issues to be addressed, it is not clear whether the existing proposal will be approved and delivered. Therefore the previous indicative SHLAA capacity is retained.

84	Land adjacent Church of Christ, Heather Brae	Gf	0.3	9	-9	0	The site is used as informal green space, with the 2012 SHLAA referring to the site as 'valuable green space' and considering it undeliverable. There are a number of mature trees on the western edge, and the site is in mixed ownership. There has remained no clear evidence of developer interest in the site since the 2012 SHLAA. It is not considered there is a reasonable prospect that the site can be delivered due to the lack of developer interest and the site's constraints.
87	Land west of Vista Road	Gr	1.25	33	-33	0	Adjacent land uses (scrapyard, cement works and landfill) are not good neighbour uses to residential development. There appears to be little developer interest and the surrounding land uses appear to remain. Therefore it is considered unreasonable to assume the site will be delivered within the Plan period.
91	Milton Street	Gr	1.27	25	-25	0	The site comprises allotments and is a former school playing field in multiple land ownerships. Part of the site is also within Flood Zone 3. The SHLAA update does not provide any update to the previous SHLAA and so due to the site's constraints it is not considered developable within the Plan period.
96	Land rear of 350 Warrington Road	Gr	0.39	11	-11	0	The site is landlocked with no obvious means of access & is also understood to have uncertain viability. The 2012 SHLAA considered the site undeliverable and it is not clear how the situation has changed since that point. There remains no evidence of developer interest and so it is considered unlikely the site will come forward for development within the Plan period.
109	Land adjacent Piele Road	PDL/Gf	0.61	13	-13	0	There remains no evidence of developer interest in the site since the 2012 SHLAA – the site is also used as informal open space which is a considerable constraint to development. It is not considered reasonable that the site will be developed within the Plan period.
112	Land to the rear of Juddfield Street	Br	1.14	41	-41	0	The site faces ownership constraints and development would require cessation of the current use. The site would also likely require remediation, which may compromise its viability. The Council has provided no updated evidence that would alter this position and so it is considered undevelopable within the Plan period.
113	Land at Willow Tree Avenue	Gf	3.5	50	-50	0	The site is severely constrained by two overhead power cables and pylons and the southern part of the site is heavily wooded. The site is in mixed ownership and there is no evidence of developer interest. It is therefore considered that the site is unviable to develop and is unlikely to be developable within the Plan period.
114	Land at 19 and 25 Sutton Moss Road	PDL/Gf	0.54	14	-14	0	The backland site comprises of 2 dwellings, gardens and agricultural small holding with access issues. As the site is in multiple ownership, would require cessation of the active use and there is no evidence of developer interest, it is considered not reasonable that it will be developed within the Plan period.
129	Derbyshire Hill Family Centre, Derbyshire Hill Road	PDL/Gf	0.32	12	-12	0	There remains no evidence to suggest that the Community Centre is no longer in active use or surplus to requirements (due to the COVID-19 pandemic a site visit could not conclude whether it was permanently closed or not). It is unreasonable to assume that the loss of a community centre would be acceptable within the Plan period.
133	Land rear of 2-24 Massey Street	PDL/Gf	0.35	14	-14	0	The site is currently used as informal recreation space, but was formerly garages and allotments. The site may also have amenity issues due to its current surroundings. The Council's updated SHLAA proformas indicate that it is unlikely the site will come forward on its own but it is being considered for a wider regeneration scheme in the area, with clearance of some of the existing stock. Therefore, this site should not be relied upon as it is only reasonable to assume it could be developed in the longer term.
134	Land at Littler Road	Gf	0.52	11	-11	0	The site is overgrown and used as informal open space with 5 pipelines along southern boundary. The Health & Safety Executive and National Grid objected to a previous residential enquiry on the site on the grounds of safety, and the site was previously excluded from the 2012 SHLAA on this basis. There is also no evidence of developer interest. The site is therefore considered to be undevelopable.
135	Land at Newby Place	Br	0.34	13	-13	0	It is noted in the updated SHLAA proformas that the site is unlikely to be viable to develop alone and Torus are looking to package up with other sites in the area. Despite potential developer interest, the constraints of the site and its use as informal open space, lead to the conclusion that there is still no reasonable prospect that the site can be delivered.
150	Former Red Quarry, Chester Lane	Br	1.92	57	-57	0	The potential remediation costs and subsequent impact upon developable area due to mature trees and the Brook to the South, in combination with other constraints (such as challenging topography in some places), result in the conclusion that it is not likely the site will be developed within the plan period.
151	Land adjacent St.Helens Hospital, Marshalls Cross Road T	Br	1.65	59	-59	0	Story Homes' previous comments still apply that this site should be removed from the Local Plan Housing Land Supply. There are significant constraints to developing the site. Firstly the northern boundary of the site is now identified within FZ3, whilst the eastern half of the site is also occupied a cluster of mature trees which would likely need to be replaced on a one for one basis. Furthermore, the 2017 SHLAA identifies that the site may be a historic landfill area and ground investigations would be required. Taking these technical constraints into account, the sites cannot reasonably considered to be developable and should emitted from the Local Plan Housing Land Supply.
HL189	Land Off Monastery Lane	Br	2.82	80	-80	0	The site has previous expired planning permissions and was considered unviable to develop in 2017 due to 'substantial unanticipated remediation costs'. There is still no evidence that the site is viable and so the site should be excluded from the housing supply.
HL483	Former Ibstock Brickworks, Chester Lane	PDL	9	260	-17	243	Despite conditions being discharged for remediation, the site had outline permission for residential units but reserved matters applications were not submitted prior to the application window, which has expired. Full planning applications will be required for the residential development of the site which will delay residential completions. Expired outline consent restricted resi to 243 units. Trajectory amended to reflect this indicative capacity.
HL525	Fishwicks Industrial Estate, Baxters Lane	Br	2.75	93	-93	0	No reserved matters or DoC applications have subsequently been submitted pursuant to the outline planning consent. The outline planning consent was granted in November 2016 and condition 1 stipulated that a reserved matters application had to be made within 3 years. Therefore, this consent has expired and the site does not benefit from planning permission and has been removed from the Local plan Housing Supply total.
NT03	Land to side and rear of 41-49 Old Wargrave Road	Br	0.61	20	-20	0	The planning permission has not been implemented and the site suffers from access issues, discovered as part of the previous planning application. It is therefore not considered developable within the Plan period.
RH11	Land off Stonecross Drive	Br	0.81	7	-7	0	The original permission was granted in 1998 – 44 of 51 dwellings were completed. There is still no evidence to indicate that the remaining phase is viable or that construction will commence. Taking into account that this site has not changed since 1998, it clearly can't be included within the Local Plan Housing Supply.
TC43	HQ Apartments (former AC Complex Site), Shaw Street	Br	0.4	64	-64	0	There is still no evidence to indicate that the remaining phase is viable or that construction will commence. Taking into account that this site has not changed since 2012, it clearly can't be included within the Local Plan Housing Supply – not considered developable within Plan period.

HL706	The Club 337 - 341 Church Road Haydock St Helens			10	-1	9	Planning permission for 10 dwellings approved but not commenced. New planning application submitted for 9 dwellings due to ownership issues with access road, under consideration by SHBC (P/2021/0419/FUL).
HL721	Stables Court, Frontfield Court And Cross Meadow Court Appleton Road St Helens			38	-10	28	Planning permission granted for remodelling of Stables Court and Frontfield Court to provide 28 units (ref: P/2020/0615/FUL).

Table 2 – Allocations supply analysis

ref	Site Name	Land Type	Size (ha)	Council's Feb 2021 Response								Council May 2021 Update								Story Homes Response May 2021				
				Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre- 20	0-5 yrs	6-10 yrs	11- 15 yrs	Total	Post 2035	Site Capacity	Units Completed	Outstanding	0-5	6-10	11 - 16	Plan period total	Total Post 2035	Response to site update	0-5	6-10	11- 16	Plan Period Total
1HA	Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood											216	0	216	20	196	0	216	0	No planning application has been submitted on the site, therefore a lead in time of 2.5 years should be applied. It seems reasonable that construction will begin in 2024 and a build out rate of 40 units per annum would be completed on the site.	20	196	0	216
2HA	Land at Florida Farm (South of A580), Slag Lane, Blackbrook											522	0	522	0	202	225	427	95	No planning application has been submitted on the site. Although the primary access is to be taken from Vicarage Road, a secondary access (left in and out) from the A580 needs to be constructed but it is expected this would not be required to allow the first phase to begin construction. Therefore this trajectory proposed seems reasonable.	0	157	270	427
3HA	Penlake Industrial Estate Land at Emr Recycling And Former British Rail Club, Railway Embankment											337	206	131	131	0	0	131	0	Reserved matters permission was granted in September 2018 and the site is partly built out. It is reasonable to consider that the remainder of the units will be completed within the 0-5 year period.	131	0	0	131
4HA	Land bounded by Reginald Road/Bold Road/Travers Entry/Gorse Lane/Crawford Street, Bold (Bold Forest Garden Suburb)											2,988	0	2988	0	120	300	420	2568	The site is being brought forward through a masterplan and is being guided by the Bold Forest Park Area Action Plan. Therefore we agree with the Council that development is not likely to start until 29/30 and a build out rate of 60 units per annum is reasonable.	0	60	360	420
5HA	Land South of Gartons Lane and former St.Theresa's Social Club, Gartons Lane, Bold											569	0	569	22	225	270	517	52	No planning application has been submitted on the site. However, we do agree with the Council's trajectory.	22	225	270	517
6HA	Land east of City Road, Cowley Hill	Br	47.09	Included as site allocation 6HA Site is the subject of a live planning application (P/2020/0083/OUEIA) for up to 1200 units	Included as site allocation 6HA Planning application is expected to go to March 2021 Committee	0	90	225	225	540	276	1100	0	1100	90	225	270	585	515	The scheme was approved at planning committee in March 2021, subject to the signing of a Section 106 agreement. The S106 agreement appears to not have been signed yet but there is a reasonable prospect of this being signed in due course.	90	225	270	585
7HA	Land West of the A49 Mill Lane and to the East of the West Coast											181	0	181	20	161	0	181	0	An application was submitted in December 2020 (P/2021/0028/FUL) for the redevelopment of the Red Bank Education Unit on the site. The application was submitted by St Helens Council and although the Planning Policy Officer objected	0	90	0	90

	Mainline railway line, Newton-le-Willows																			to the proposed development, it would result in a reduced capacity for housing on the site. In addition, this is likely to cause delays to developing the remaining land as residential. Do not agree that 20 units are deliverable within 0-5 years.				
8HA	Land South of Higher Lane and East of Rookery Lane, Rainford										259	0	259	22	225	12	259	0		No application yet submitted for the site but the lead in times and development trajectories seem appropriate.	22	225	12	259
9HA	Land north of Elton Head Road			Site obtained outline planning permission (P/2018/0060) for 352 units in June 2018.	N/A	0	135	217	0	352	0	352	135	217	0	352	0		Reserved Matters application by Bloor Homes for 294 homes validated 23/04/21 (P/2021/0405/RES). Unlikely that the outline capacity of the site will be realised. Trajectory reduced to 294 dwellings to match reserved matters application.	135	159	0	294	
10H A	Moss Nook Urban Village, Watery Lane			£2M grant has been secured from the LCR SIF to accelerate development of the site. The funding will help unlock the first phase of the site (circa 240 units) through financially contributing to the construction of a spine road and associated infrastructure. Groundwork s are ongoing							802	0	802	135	225	270	630	172	Planning Application for Reserved Matters has been submitted for Phase 1 of the development site, circa 258 units (P/2021/001 5/RES). Taylor Wimpey Reserved matters application is not yet approved, but TW expect that Phase 1 will be delivered by the end of 2026 which is in accordance with the Council's trajectory. However, it is unknown whether there has been any further developer interest in future phases of the development.	135	225	270	630	
Brownfield Allocations (3HA, 6HA, 9HA, 10HA)																				491	609	540	1640	
Green Belt Allocations (1HA, 2HA, 5HA, 7HA, 8HA)																				64	953	912	1929	
TOTAL																				555	1562	1452	3569	

Table 3 – SHLAA Supply Analysis

ref	Site Name	Land Type	Size (ha)	Story Homes Analysis 2019				Council's Feb 2021 Response								Council's May 2021 Update						Story Homes Response May 2021							
				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total
1	Land rear of 1-27 Station Road	Gr	0.4	There are no policy constraints to delivering residential development at this location and there are no known legal constraints. A number of recent pre-application enquiries indicate developer interest of the site. 2012 SHLAA considered site deliverable in 0-5 years, however no progress to date. In the absence of evidence that the site of an application, the deliverability of the site has been moved to 6-10 years.	12	0	0	12	Live planning application for 14 units (P/2019/0794/FUL)	Live planning application for 14 units awaiting decision (P/2019/0794/FUL)	0	12	0	0	12	0	12	0	12	0	0	12	0	Planning application P/2019/0794/FUL withdrawn & new outline application submitted P/2021/0277/OUP. Withdrawn full application raised issues relating to archaeology, highways, remediation that require resolution and may delay commencement. It remains reasonable to assume the site will be developed within the Plan period.	12	0	0	12	
10	Land at junction of Sunbury Street and Fir Street	Br	0.82	An application (P/2018/0882/FUL) for 30 dwellings on site is awaiting decision. The development trajectory and capacity have been updated accordingly	30	0	0	30	Site gained planning permission in May 2019 (P/2018/0882/FUL) for the erection of 30 dwellings	N/A	0	30	0	0	30	0	30	0	30	0	0	30	0	Pre-commencement conditions discharged, including a construction phasing programme which indicates completion within 54 weeks of commencement. Commencement expected in 2021.	30	0	0	30	
13	Land rear of Carnegie Crescent and Goodban Street	Br	0.82	The site is considered likely to have financial viability issues. The site is currently used as a car park. It is within the sole ownership of Helena Homes. The site is subject to an expired outline and reserved matters approval on the site from 2004 and 2006.	7	0	0	7	No change. Site is in Helena Homes ownership who have indicated that they still intend to develop it	No change. Site is in local authority ownership.	0	0	7	0	7	0	7	0	7	0	7	0	7	0	The site was the subject of outline planning permissions dating back to 2004 and 2006, which have both expired. There is no current planning application submitted. Nevertheless, the site is developable within the plan period.	0	7	0	7
16	Land at Egerton Street															12	0	12	12	0	0	12	0	The site was not considered developable by the 2017 SHLAA. Nevertheless, P/2020/0583/FUL, an application for 12 units, was approved in December 2020. The applicants have subsequently applied to	12	0	0	12	

ref	Site Name	Land Type	Size (ha)	Story Homes Analysis 2019				Council's Feb 2021 Response									Council's May 2021 Update						Story Homes Response May 2021					
				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16
																							discharge pre-commencement conditions. It is therefore reasonable to assume the site will be built out.					
18	Land at Somerset Street and Sussex Grove	Br	2.21	In the 2012 SHLAA, the site was anticipated to come forward in the 0-5 year period. Despite this, there has been no activity on the site in this time. It is noted the site is an awkward shape and is likely to be constrained by the existing surrounding residential properties. Despite these concerns, the anticipated trajectory of the site has been accepted.	0	66	0	66	No change. This site is in Helena Homes ownership who have indicated that they still intend to develop it.	No change. This site is in Torus62 (Housing Association) ownership who have indicated that they still intend to develop it	0	0	66	0	66	0	66	0	66	0	66	0	66	The site is the subject of previously lapsed planning permissions. There are no current planning applications pending consideration by the Council. Story Homes' previous concerns regarding the site are still relevant but the site remains developable within the Plan period.	0	66	0	66
19	Leyland Green Road	Gr	0.53	Topography of the site may limit viability of the site yet due to previous developer interest (expired planning permission from 2005) it is reasonable to expect the site to come forward in a later trajectory than the 2017 SHLAA identified. Site trajectory kept in 5 year period in 2012 SHLAA yet due to the lack of evidence that developer is interested in site it is not reasonable to expect it to come forward within 5 years.	0	7	0	7	P/2019/0728/FUL – application for 9 dwellings – withdrawn – 26.11.19. United Utilities objected to the site layout as it would compromise their ability to access the significant water main to the north of the site	Planning permission has been granted for 8 dwellings (reference: P/2020/0478/FUL).	0	8	0	0	8	0	9	0	9	9	0	0	9	No pre-commencement conditions discharged since full planning permission granted in December 2020 but likely that the site can be delivered within 5 years.	8	0	0	8
22	Land at corner of Fairclough Street and Wargrave Road	Br	0.83	Site has expired planning approval from February 2011 for apartments. Due to concerns with viability the apartment scheme was moved back from the 2012 SHLAA trajectory. Site may require remediation. There is therefore considerable uncertainty	0	14	0	14	No change	No change. There is still developer interest in the site	0	0	14	0	14	0	14	0	14	0	14	0	14	Site is developable within the plan period, despite the absence of an extant planning permission.	0	14	0	14

ref	Site Name	Land Type	Size (ha)	Story Homes Analysis 2019				Council's Feb 2021 Response								Council's May 2021 Update						Story Homes Response May 2021								
				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total	
				about the delivery of the site.																										
23	Liverpool Arms and former Sacred Heart RC Church and School, Borough Road	Br	0.83	The site is largely clear and in a derelict state. A previous outline application (P/2004/1101) demonstrates some developer interest in the site. Overall it is therefore considered that there is a reasonable chance of development on the site.	0	0	29	29	No change, but development of the site remains a priority for the Council given its prominent town centre location.	No change, but development of the site remains a priority for the Council given its prominent town centre location.	0	29	0	0	29	0	29	0	29	29	0	0	29	0	SHBC update indicates the site is now within Local Authority ownership, which increases the likelihood of development on the site but in the absence of a planning application, there is still only a reasonable chance of development on the site – 6-10 years may be a more realistic trajectory.	0	29	0	29	
25	Alexandra Park – Former Pilkington HQ	Br	10.8	The site is now partially vacant, but there has been no immediate developer interest to date in the form of planning application. In the absence of additional evidence about the short-term deliverability of the site, the delivery of the total capacity has been split over 6-10 and 11-15 years	0	162	0	162	No change. There is still developer interest in the site	No change. There is still developer interest in the site and there has been pre-application discussion for part of this site.	0	0	162	0	162	0	162	0	162	0	162	0	0	162	0	There remains the absence of developer interest in the form of a planning application. It seems unlikely that the site could be delivered within the next 6-10 years considering the absence of a planning permission and timescales surrounding the conversion of a Grade II Listed Building. However, the site remains developable within the Plan period should a developer come forward.	0	0	162	162
27	Former Bethell Mission Bowling Green, Marsden Avenue	Gr	0.27	Site has an expired permission (P/2010/0638) and there is no clear evidence of developer interest in the site and the site and no progress on the site despite it being identified as deliverable within the next 5 years when assessed in the 2012 SHLAA. However there is a reasonable prospect that the site could be viably developed. The site is therefore considered developable	0	0	10	0	No Change	No Change	0	0	10	0	10	0	10	0	10	0	10	0	10	0	There remains no clear evidence of developer interest in the site and no progress made, despite the site being identified as developable in both the 2012 and 2017 SHLAA. The SHLAA Proforma update indicates that the site is being considered for inclusion within a funding bid for small sites funding from Homes England. Despite these concerns, the site remains developable and the Council's endeavours to secure funding increases the likelihood of the site being developed. We will monitor the outcome of the funding bid.	0	10	0	10	
31	Former Sutton Arms PH,	Br	0.35	The site requires investigation due to the potential presence of	0	18	0	18	No change.	No change. There is still developer interest in the site and there has been	0	0	18	0	18	0	18	0	18	0	18	0	18	0	Due to the size of the site and the potential issues associated with its development, such as	0	0	0	0	

ref	Site Name	Land Type	Size (ha)	Story Homes Analysis 2019				Council's Feb 2021 Response								Council's May 2021 Update						Story Homes Response May 2021						
				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16
				there has been known developer interest in the site. It is therefore considered that there is a reasonable chance of development on																			C/2020/0084/CON). The approved spine road, now under construction, does not include a bell mouth to the site – it could be accessed from Sutton Road but the approved spine road layout does not indicate an intention to integrate the site in to the wider development. Therefore, it is concluded that the prospect of residential development on the site within the Plan period is unlikely.					
65	Former Pumping Station, Sutton Road	Br	0.27	Site is part of the wider Moss Nook development area. Original permission (P/2003/1574) not acted on, no subsequent application so there is questionable developer interest in the site. The site is likely to have highly marginal viability due to need for remediation and demolition, and is therefore considered that any delivery on site would be towards the end of	0	0	10	10	No change but wider Moss Nook site (SHLAA site 9) has received grant funding to help deliver phase 1.	No change but wider Moss Nook site (SHLAA site 9) has received grant funding to help deliver phase 1.	0	0	10	0	10	0	10	0	10	0	10	0	As above, excluded from wider landowner Harworth's discharge of condition phasing plan (ref - C/2020/0084/CON). and also not included within Taylor Wimpey's Phase 1 development layout. Site does not appear to be in an alternative use however the remediation and demolition costs may render the small site unviable. Unlikely the site will be developed within the Plan period.	0	0	0	0	
66	Land off Wargrave Road	PDL / Gf	0.3ha	There is no clear evidence of developer interest in the site yet in the absence of any other evidence the site is retained with the indicative capacity from the SHLAA.	0	7	0	7	No change.	No Change.	0	0	7	0	7	0	7	0	7	0	7	0	The presence of protected trees and lack of developer interest in the site indicates a lack of clear evidence that the site is deliverable within the Plan period. The indicative capacity from the SHLAA is accepted due to the small size of the site.	0	7	0	7	
69	Site of former Parr Community High School, Fleet Lane	Br	1.52	Status of site has not changed from 2012 SHLAA. 2012 SHLAA identified site as expected to be disposed in the short term. There is no evidence to demonstrate the site could be developed	0	54	0	54	No change.	No change.	0	0	54	0	54	0	54	0	54	0	54	0	The site is being considered within a potential funding bid to Homes England for small sites. Despite this, no progress seems to have been made since 2012 and there appears to be a lack of developer interest. Nevertheless, the fact that the Council has been pro-	0	54	0	54	

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				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16
				within the 6-10 year period too yet despite concerns the anticipated trajectory of the site is accepted.																			actively trying to secure funding increases the chance that the site is developable within the Plan period.					
72	Site of former St.Marks Primary School, Willow Tree Avenue	Br	0.51	The site is a cleared former school site which has become somewhat overgrown with mature trees. The 2017 SHLAA states that there is developer interest yet there is no evidence of this.	0	18	0	18	No change.	No change.	0	0	18	0	18	0	18	0	18	0	18	0	The site is being considered within a potential funding bid to Homes England for small sites. Despite this, no progress seems to have been made since 2012 and there appears to be a lack of developer interest. Nevertheless, the fact that the Council has been proactively trying to secure funding increases the chance that the site is developable within the Plan period.	0	18	0	18	
74	Site of former 119-133 Crow Lane West	Br	0.3	The site has an active use (builders merchant) and is thought to require decontamination prior to development, there is a reasonable prospect that the site will be available and could be viably developed. The site is therefore considered developable.	0	0	9	9	No change.	No change.	0	0	0	9	9	0	9	0	9	0	0	9	9	SHBC's updated SHLAA proformas indicates that the site is still in active use and is within mixed land ownership. There is a lack of evidence of developer interest. Nevertheless, it is considered that the site is developable within 11-15 years should the existing use cease.	0	0	9	9
75	Christ Church Parish Hall, Chapel Lane	Br	0.36	Outline application for 7 dwellings (P/2018/0739/OUP) was approved in January 2019. It is considered that there is a reasonable prospect for the site to come forward for 7 (rather than 10) in 0-5 years.	7	0	0	7	Site now has outline planning permission for 7 units (P/2018/0749). Site has not started.	No Change.	0	7	0	0	7	0	6	0	6	6	0	0	6	Reserved matters approval granted for 6 dwellings in December 2020 (P/2020/0439/RES). Pre-commencement conditions were discharged in late 2020. Therefore, it is likely that the site will deliver the 6 approved dwellings in 0-5 years.	6	0	0	6
78b	Former St.Helens Glass, Corporation Street	Br	2.07	The site is cleared, former industrial land within the Town Centre. An application (P/2017/0634/FUL) was approved in November 2017 for a 130 unit extra care facility on the northern part of the site. There is no known developer interest on	0	130	0	130	Site B - Site has been split from 78a. Assumed density is 70 dwellings per hectare with a 90% net developable area.	Site B Taking account of a revised site area the potential site yield has been recalculated. Assumed density is 70 dwellings per hectare with a 90% net developable area. Revised site yield is now 61 units	0	0	61	0	61	0	61	0	61	0	61	0	Site B Site is available and is suitable for high density development, as it is located close to St Helens Central. However, there may be issues with ground contamination and remediation required which may discourage its development. There is a lack of	0	0	61	61	

ref	Site Name	Land Type	Size (ha)	Story Homes Analysis 2019				Council's Feb 2021 Response								Council's May 2021 Update						Story Homes Response May 2021							
				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total
				the southern half of the site, therefore the capacity is																			clear evidence of developer interest. It is therefore considered more likely that the site may be developed within 11-15 years.						
82	Land adjacent Laffak Road and Carr Mill Road	PDL /Gf	3.31	An application (P/2019/0036/FUL) was submitted in January 2019 for 150 residential units. This application has not been approved to date, but does demonstrate developer interest of the site. There are therefore reasonable prospects of development on the site, and as such the site is retained with the indicative SHLAA capacity in 6-10 year deliverability.	0	99	0	99	Site was the subject of a planning application for a mixed use scheme including 150 residential units comprising of 57 houses, 1 bungalow, and 92 apartments (P/2019/0036/FUL) which was withdrawn in November 2019, to allow for flood risk, landscaping and acoustic issues to be addressed. Revised application likely soon.	There is a live application for 150 residential units, awaiting decision (reference: P/2020/0153/FUL)	0	0	150	0	150	0	150	0	150	0	0	150	0	No progress has been made on the planning application since May 2020. The planning application demonstrates developer interest but it is not clear whether the existing proposal will be approved and delivered. Therefore the previous indicative SHLAA capacity is retained.	0	99	0	99	
84	Land adjacent Church of Christ, Heather Brae	Gf	0.3	The site is used as informal green space, with the 2012 SHLAA referring to the site as 'valuable green space' and considering it undeliverable. There are a number of mature trees on the western edge, and the site is in mixed ownership. Additionally there is no clear evidence of developer interest in the site. Development of the site is likely to contravene NPPF Paragraph 97 and its current use is likely to represent a significant constraint. It is not considered there is a reasonable prospect that the site can be delivered	0	0	0	0	No change.	No change.	0	0	9	0	9	0	9	0	9	0	9	0	9	0	0	0	0	0	0
87	Land west of Vista Road	Gr	1.24	The 2017 SHLAA states that the scrapyard, cement works and landfill 'may reduce the	0	0	0	0	No Change.	No change. There is still developer interest in the site and there has been	0	0	0	33	33	0	33	0	33	0	0	33	33	0	0	0	0	0	

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				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total
				prospect of development in the near future'. In the absence of any information that this will change, the site is removed from the trajectory at this time.						a pre-application discussion.													the site's constraints it is not considered a reasonable prospect that it can be delivered.						
89	Land rear of 64-94 Marshalls Cross Road	Gr	0.96	A pre-application enquiry was submitted for the site in 2019 for a total of 35 dwellings. However no formal application has yet been made, so in the absence of any further evidence the site is retained with the indicative capacity from the SHLAA.	0	12	0	12	Site now has full planning permission for 32 units (P/2019/0693). Site has not started.	N/A	0	32	0	0	32	0	32	0	32	32	0	0	32	0	Pre-commencement conditions appear to be discharged and so the permission appears to be implementable. It is reasonable to assume that the 32 permitted dwellings will be delivered.	32	0	0	32
91	Milton Street	Gr	1.27	Site comprises allotments and is a former school playing field. Part of the site is within Flood Zone 3 and allotments on part of site/to south. The site is also in multiple ownership. Due to this combination of factors there is considerable uncertainty as to whether the site can be developed for housing, and it should not be relied on in the supply.	0	0	0	0	No change.	No change.	0	0	25	0	25	0	25	0	25	0	25	0	25	0	Story Homes' previous comments are still applicable. SHBC's SHLAA update indicates there has been no change in circumstance for the site and so we still consider that it should not be relied upon.	0	0	0	0
95	Site of former Carr Mill Infants School, Ullswater Ave	PDL /Gf	1.49	Site overgrown cleared former school site surrounded by residential uses. Site was kept in 0-5 year period in 2012 SHLAA as enquiries were received to develop a residential scheme in the short term.	0	53	0	53	No change.	No change.	0	0	53	0	53	0	53	0	53	0	53	0	53	0	SHBC SHLAA update indicates that Torus62 Ltd (Housing Association) are currently producing an Area Action Plan for Moss Bank and also looking for small sites to develop. Reasonable to assume the site will come forward in line with SHLAA trajectory.	0	53	0	53
96	Land rear of 350 Warrington Road	Gr	0.39	The site is landlocked with no obvious means of access, and considered to have uncertain viability. The site was considered to	0	0	0	0	No change.	No change.	0	0	0	11	11	0	11	0	11	0	0	11	11	0	Story Homes' previous comments are still applicable – there remains no evidence that the site will come forward for development.	0	0	0	0

ref	Site Name	Land Type	Size (ha)	Story Homes Analysis 2019				Council's Feb 2021 Response								Council's May 2021 Update						Story Homes Response May 2021						
				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16
				be undeliverable in the 2012 SHLAA, and there is no clear evidence that the site will come forward for development.																								
102	Auto Safety Centre, Vicarage Road	Br	0.31	The site remains in an active use and was converted (circa. 2012) to car repair garage. Although development would require cessation of use, there is a reasonable prospect that the site will be available and could be viably developed. The site is therefore considered developable.	0	9	0	9	No change.	No change.	0	0	9	0	9	0	9	0	9	0	9	0	0	As SHBC's updated SHLAA proformas indicate, there has been no change in circumstance and so it is reasonable to conclude the site remains developable.	0	9	0	9
103	Land rear of 39-67 Valentine Road	PDL /GF	0.46	Development of the site will involve the loss of Open Space and the site is an awkward shape that is likely to further reduce the developable area and density of any potential development. There is no clear evidence that the site will come forward for development and it should be removed from the supply.	0	0	0	0	No change.	No change.	0	0	10	0	10	0	10	0	10	0	10	0	0	Story Homes' previous comments still stand although the Council's updated proforma indicates Torus have included the site in a small sites list for an application for funding from Homes England. Therefore, there is a reasonable prospect that funding may be provided and the site developed and so it is retained as included within the Council's trajectory.	0	10	0	10
106	Site of former 126-154 Birchley Street and 107- 125 Brynn Street	Br	0.25	The site is considered to be developable. There is currently no known developer interest, however the site is likely to be financially viable.	0	10	0	10	No change.	No change. Site continues to be considered for residential use as part of the Council's wider regeneration proposals for the Town Centre.	0	0	10	0	10	0	10	0	10	0	10	0	0	The updated SHLAA proformas indicate that the site remains in active use as a car park, but may be developed as part of the Council's wider regeneration proposals for the Town Centre. There is no current evidence of developer interest but considering the potential for funding, the trajectory is accepted.	0	10	0	10
109	Land adjacent Piele Road	PDL / Gf	0.61	The site is 75% previously developed land and 25% greenfield land that in 2012 was in use as informal open space. The 2012 SHLAA	0	0	0	0	No change.	No change.	0	0	13	0	13	0	13	0	13	0	13	0	0	There remains no evidence of developer interest in the site and so Story Homes' previous comments still apply.	0	0	0	0

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				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total
				noted that there was no developer interest on the site in the short term, and moved the site to the 6-10 year period. There is no evidence that the site can still be relied on to come forward in 6-10 years. It is not considered there is a reasonable prospect that the site can be delivered.																									
112	Land to the rear of Juddfield Street	Br	1.14	Although there has been previous developer interest in the site, it would require the cessation of the current use and remediation of the site which may reduce overall viability. The site also faces ownership constraints. Overall, it is considered the site faces several constraints and should not be relied upon in the supply.	0	0	0	0	No change.	No change.	0	0	0	41	41	0	41	0	41	0	0	41	41	0	Story Homes' previous comments remain applicable – the Council's updated evidence indicates no change to the situation and the site is not developable.	0	0	0	0
113	Land at Willow Tree Avenue	Gr	3.5	The site is severely constrained by 2 overhead HV lines and pylons. Southern portion of site is heavily wooded. Furthermore, the site is in mixed ownership and there is no evidence of developer interest in the site. Site should be taken out. Site removed from trajectory.	0	0	0	0	No change.	No change.	0	0	0	50	50	0	50	0	50	0	0	50	50	0	Story Homes' previous comments remain applicable – the Council's updated evidence indicates no change to the situation.	0	0	0	0
114	Land at 19 and 25 Sutton Moss Road	PDL /Gf	0.54	The site is in multiple ownership which given the modest size of the site, may constrain delivery in the short or medium term. It is a backland site with 2 dwellings, gardens and agricultural small-holding with access issues The	0	0	0	0	No change.	No change.	0	0	0	14	14	0	14	0	14	0	0	14	14	0	Story Homes' previous comments remain valid. Unlikely to be developable within the Plan period.	0	0	0	0

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				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total
				site comprises 2 dwellings and is therefore in an active use which would require cessation prior to development. It is considered that due to these factors it is not reasonable to expect the site to come forward until the long term																									
123	243 Leach Lane Sutton Leach, St Helens																												
126	Former Halton and St Helens PCT HQ, Cowley Hill	Br	0.89	Developer interest is evident through recent pre-application interest on the site, and through applications for demolition of the existing buildings. Therefore there is a reasonable prospect that the site will be available and could be viably developed. The site is therefore considered developable	32	0	0	32	Site has a planning permission for the development of Specialist C2 75 unit scheme (P/2018/0535/FUL) Some of the planning conditions were discharged in 2018. However, C2 developer has now pulled out, site is now being considered for C3 use	Site has a planning permission for the development of Specialist C2 75 unit scheme (P/2018/0535/FUL) Some of the planning conditions were discharged in 2018. However, C2 developer has now pulled out, site is now being considered for C3 use.	0	32	0	0	32	0	32	0	32	32	0	0	32	0	Unclear whether there is developer interest in the site for C3 use now the C2 developer has pulled out. Therefore, it may be reasonable to anticipate development will take place between 6-10 years.	0	32	0	32
129	Derbyshire Hill Family Centre, Derbyshire Hill Road	PDL /Gf	0.32	The site is currently in use as a community centre. The 2012 SHLAA identified the site as deliverable in 11-15 years, in the absence of further evidence to suggest the centre is surplus to requirements it is unreasonable to assume the site will come forward for development	0	0	0	0	No change.	No change.	0	0	0	12	12	0	12	0	12	0	0	12	12	0	SHLAA Update indicates that the Community Centre seemed close on a recent site visit, but it was not clear whether this was because of the COVID-19 pandemic. Without evidence of the permanent closure of the Community Centre, it remains unreasonable to assume the site will come forward for development within the plan period.	0	0	0	0
133	Land rear of 2-24 Massey Street	PDL / Gf	0.35	The site is currently greenspace which is currently used for informal recreation and was previously former garages and allotments. The 2012 SHLAA notes	0	0	0	0	No change.	No change.	0	0	0	14	14	0	14	0	14	0	0	14	14	0	The Council's updated SHLAA proformas indicate that it is unlikely the site will come forward on its own but it is being considered for a wider regeneration scheme in the area, with clearance of some of	0	0	0	0

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				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total	
				that the site is located within the Hays Chemical Consultation zone. The site may have issues with amenity as a factory, warehouse and other industrial uses lies to the immediate north and St Helens Hospital is to the immediate west. Furthermore there is no evidence of developer interest. The SHLAA trajectory is therefore not considered reasonable and the site should not be relied upon in the supply																			the existing stock. Therefore, this site should not be relied upon as it is only reasonable to assume it could be developed in the longer term.							
134	Land at Littler Road	Gf	0.52	The site is overgrown and used as informal open space with 5 pipelines along southern boundary. The Health & Safety Executive and National Grid objected to a previous residential enquiry on the site on the grounds of safety, and the site was previously excluded from the 2012 SHLAA on this basis. The site is therefore considered to be undevelopable	0	0	0	0	No change.	No change.	0	0	11	0	11	0	11	0	11	0	11	0	11	0	11	0	0	0	0	0
135	Land at Newby Place	Br	0.34	It was noted in the 2012 SHLAA that the site was in use as informal open space as a square to properties on Newby Place and was considered not deliverable. Development of the site is likely to conflict with NPPF Paragraph 97. The site surrounded by existing bungalows which is likely to severely limited developable area. There is no evidence of	0	0	0	0	No change.	No change.	0	0	13	0	13	0	13	0	13	0	13	0	13	0	13	0	0	0	0	0

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				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total
154	College Street Northern Gateway	Br	2.88	Site is home to numerous active uses including a job centre, register office and car park which would require cessation and demolition prior to development which may reduce overall viability. However it is considered that there is a reasonable prospect of the site being delivered in the 11-15 year time period.	0	0	103	103	Site continues to be considered for residential use as part of the Council's / One Public Estate proposals for the Town Centre.	Site continues to be considered for residential use as part of the Council's wider regeneration proposals for the Town Centre.	0	0	103	0	103	0	103	0	103	0	103	0	The Council's SHLAA update indicates that the site is being considered for funding via the Towns Fund application as part of a wider redevelopment of the Town Centre. It is considered reasonable that the site could be developed during the Plan period.	0	103	0	103		
HL1 89	Land Off Monastery Lane	Br	2.82	Site has expired outline permission from 2010 (P/2009/1072), extended in 2013 (P/2013/0185). The 2017 SHLAA states that the developer indicated that there are 'substantial unanticipated remediation costs' which resulted in the development becoming unviable. There is no evidence that there is a reasonable prospect that the site can be delivered therefore it should be removed from the supply.	0	0	0	0	No change.	n/a	0	0	0	80	80	0	80	0	80	0	80	80	0	There is still no evidence to indicate that the site is viable and the site should therefore be excluded from the Local Plan Housing Supply	0	0	0	0	
HL2 89	388 Clipsley Lane	Gr	0.55	Planning permission P/2016/0335/FUL approved in 2016, expires 23/06/2019, no DoC application submitted yet. Site is in process of being built out and therefore it is reasonable to assume site will be built out in 10 year period.	5	0	0	5	Site has a full planning permission (P/2019/0817) and is under construction.	n/a	0	5	0	0	5	0	5	0	5	5	0	0	5	0	The site is under construction and likely to be built out.	5	0	0	5
HL3 10	Phase 3 (Aka 2b) Land Site Of Former	PDL	2.54	It is assumed this permission is still extant.	74	0	0	74	Reserved Matters Permission for P/2019/0217/FUL 89 dwellings this is	n/a	0	89	0	0	0	0	89	3	86	86	0	0	86	0	A s.73 application was granted in January 2021 for the variation of conditions attached to the reserved matters granted in 2019 and the	86	0	0	86

ref	Site Name	Land Type	Size (ha)	Story Homes Analysis 2019				Council's Feb 2021 Response								Council's May 2021 Update						Story Homes Response May 2021								
				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total	
				being determined. Assuming planning permission is still extant, it is reasonable to expect the site to come forward in the 5 year period.																										
HL4 83	Former Ibstock Brickworks, Chester Lane	PDL	9	A Hybrid planning application (P/2015/0599/HYBR) was granted in May 2016. Full permission was granted for the importation of fill and profiling of the site and outline for residential development. Whilst we understand work on the site is progressing, there is a requirement for substantial land remediation works over several years to take place before dwellings can be developed on site. It is therefore optimistic to expect first dwellings to be delivered as soon as 2019/20, and the trajectory should be amended to reflect this.	10	100	150	260	Relevant conditions for site remediation were discharged in 2018 (site has full planning permission for site profiling and outline for residential use). Site levelling and profiling is being undertaken.	n/a		0	135	125	0	260	0	260	0	260	135	125	0	260	0	Remove from 5 year supply. Despite conditions being discharged for remediation, the site had outline permission for residential units but reserved matters applications were not submitted prior to the application window, which has expired. Full planning applications will be required for the residential development of the site which will delay residential completions. Expired outline consent restricted resi to 243 units. Trajectory amended to reflect this indicative capacity.	0	135	108	243
HL4 96	Land at Elton Head Road, Lea Green	Gr	6.2	Permission for 180 dwellings was granted in April 2016. A Reserved Matters application must therefore be submitted before the end of April before the permission expires. It is considered reasonable to assume the site will deliver 180 dwellings over the 15 year period. However, unlikely as many as 135 dwellings will be delivered in the first 5 years given the need to apply for reserved matters and discharge conditions. Even applying	90	90	0	180	Site now has a full planning permission (P/2019/0216).	n/a		0	180	0	0	180	0	180	0	180	180	0	0	180	0	A S.73 application was submitted on 30 th April 21 on behalf of the landowner (Lord Richard St Helens) to vary the conditions of the outline consent relating to the acceptability to discharge conditions individually for each phase in accordance with the Phasing Layout approved as part of the reserved matters. The Phasing Layout shows that the construction of housing will take place as part of Phase 3 following ground modelling and landscaping works. Therefore, Story Homes' position in 2019 that 90 units would be delivered within 0-5 years and	90	90	0	180

ref	Site Name	Land Type	Size (ha)	Story Homes Analysis 2019				Council's Feb 2021 Response								Council's May 2021 Update						Story Homes Response May 2021							
				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total
				SHMBC's estimates for lead-in times and delivery rates, it is considered the trajectory for the 0-5 year period should be reduced by 45 dwellings.																			the remaining 90 units would be delivered in the following 6-10 year period is reasonable and more realistic than the Council's projections.						
HL5 24	Clough Mill Blundells Lane	Br	0.51	Outline permission P/2016/0193/OUP expires December 2019, no Reserved Matters application has been submitted to date. It is reasonable to assume that there may be interest in the site, and it is considered reasonable to assume that (pursuant to a new application or RM application) the site will come forward.	0	10	0	10	Renewal of outline planning permission (P/2019/0812).	n/a		0	10	0	0	10	0	10	0	0	10	0	A new outline permission was granted on 21 st February 2020 to renew the original outline consent. Therefore it is reasonable to consider that the 10 units will be constructed within 5 years, thus the site is deliverable.	10	0	0	10		
HL5 25	Fishwicks Industrial Estate, Baxters Lane	Br	2.75	Industrial estate still in active use in 2018. An outline application (P/2016/0299/OUP) was approved in November 2016 for 93 dwellings. No RM application has been submitted to date. It is therefore fair to say there is some developer interest in the site, however in the absence of a further application the of total capacity has been split over 0-5 and 6-10 years.	47	46	0	93	No change. Site has outline planning permission and demolition of some buildings commenced in 2017.	n/a		0	90	3	0	93	0	93	93	0	0	93	0	No reserved matters or DoC applications have subsequently been submitted pursuant to the outline planning consent. The outline planning consent was granted in November 2016 and condition 1 stipulated that a reserved matters application had to be made within 3 years. Therefore, this consent has expired and the site does not benefit from planning permission and has been removed from the Local plan Housing Supply total.	0	0	0	0	
HL5 31	Land At Mere Grange Lowfield Lane	Gr	3.6	An outline approval (P/2016/0567/HYBR) in November 2016 allowed for 120 dwellings. A full application for 82 dwellings (P/2018/0849/FUL) submitted in November 2018, awaiting decision. Development capacity altered accordingly.	82	0	0	82	The site is under construction and capacity reduced to 81.	n/a		15	67	0	0	67	0	82	40	42	42	0	We agree with this revision of the trajectory in light of the planning consent for 82 dwellings which is now partially implemented, resulting in 42 units being included within the Local Plan Housing Supply.	42	0	0	42		

ref	Site Name	Land Type	Size (ha)	Story Homes Analysis 2019				Council's Feb 2021 Response									Council's May 2021 Update						Story Homes Response May 2021						
				Story Homes Comments	0-5 yrs	6-10 yrs	11-15 yrs	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total
HL537	Windlehurst Youth Centre Gamble Avenue	PDL	0.47	Application for 12 dwellings (P/2016/0650/FUL) approved in November 2016, although no DoC application has been submitted to date it is reasonable to assume the development will come forward in 0-5 years.	12	0	0	12	No change.	n/a	0	12	0	0	12	0	12	0	12	0	0	12	0	There are a number of pre-commencement conditions attached to the planning consent dated 25.11.2016, and the Council's update in May 21 now states that the site is under construction. Therefore we agree that the site capacity of 12 units is likely to be delivered in 0-5 years.	12	0	0	12	
NT03	Land to side and rear of 41-49 Old Wargrave Road	Br	0.61	The site has planning approval (ref. P/2016/0412) from May 2016 alongside one discharge of condition application in 2018 which did not succeed in discharging the condition. As of 2017 work on site had not yet started. Assuming the permission is still extant, no evidence is supplied to demonstrate reasonable prospect of delivering within 5 years therefore supply is moved to 6-10 years.	20	40	0	60	SHLAA 2017 site with planning permission now expired (P/2016/0412). Taking account of a revised site area the potential site yield has been recalculated. Assumed density is 40 dwellings per hectare with a 90% net developable area. Revised site yield is now 20 units. There is still developer interest in the site and there has been a pre-application discussion.	n/a	0	0	20	0	20	0	20	0	20	0	20	0	20	0	The planning permission has not been implemented and the site suffers from access issues, discovered as part of the previous planning application. Removed from trajectory.	0	0	0	0
NT06	Phase 4 Land Site of Former Vulcan Works, Wargrave Road	Br	3.76	The site has planning permission (ref. P/2016/0604) and numerous DoCs have been approved, the latest in June 2018. Assuming planning permission is extant there is a reasonable prospect of the site being delivered in the 10-15 year time period.	0	134	0	0	Under construction.	n/a	91	43	0	0	43	0	134	119	15	15	0	0	15	0	Given that the conditions have been discharged and 119 of the 134 units have been delivered, it is anticipated that the remaining 15 will be delivered.	15	0	0	15
RH11	Land off Stonecross Drive	Br	0.81	The original permission for the site was granted in 1998. 44 of the 51 dwellings have been	0	0	0	0	No change to the Council's original position.	n/a	0	0	0	7	7	8	1	7	0	0	7	7	0	There is still no evidence to indicate that the remaining phase is viable or that construction will commence.	0	0	0	0	

ref	Site Name	Land Type	Size (ha)	Story Homes Analysis 2019				Council's Feb 2021 Response								Council's May 2021 Update							Story Homes Response May 2021																																																									
				Story Homes Comments	0-5	6-10	11-15	Total	Change since 2017 SHLAA as of 31.03.20	Further changes to proformas since 2017	Pre-20	0-5 yrs	6-10 yrs	11-15 yrs	Total	Post 2035	Site Capacity	Completed	Outstanding	0-5	6-10	11-16	Plan Period	Total Post 2035	Response to update	0-5	6-10	11-16	Plan Period Total																																																			
					5 yrs	10 yrs	15 yrs	5																						10	15	5	10	15																																														
	Lancots Lane And Dismantled Railway Line Lancots Lane St Helens																																																																															
HL7 06	The Club 337 - 341 Church Road Haydock St Helens															10	0	10	10	0	0	10	0		Planning permission for 10 dwellings approved but not commenced. New planning application submitted for 9 dwellings due to ownership issues with access road, under consideration by SHBC (P/2021/0419/FUL).	9	0	0	9																																																			
HL7 07	13 - 15 Earle Street Newton Le Willows Merseyside															8	0	8	8	0	0	8	0		Planning permission for conversion of first floor of a building in to 8 flats (P/2020/0373/FUL). Likely to be delivered within the plan period.	8	0	0	8																																																			
HL7 08	1 Millwood Avenue Eccleston St Helens															36	0	36	36	0	0	36	0		Planning permission granted for 36 dwellings on the site (ref - P/2019/0654/FU). Conditions being discharged. Likely to be delivered.	36	0	0	36																																																			
HL7 15	Land Site Of Former Haydock Working Mens Club Penny Lane Haydock															4	0	4	4	0	0	4	0		Planning permission granted for 4 dwellings (P/2020/0419/FUL). Likely to be implemented within the plan period.	4	0	0	4																																																			
HL7 17	19 Hardshaw Street St Helens															7	0	7	7	0	0	7	0		Planning permission granted for change of use of office to 7 flats (ref P/2020/0495/FUL).	7	0	0	7																																																			
HL7 19	Land Site Of Former 7A Cooper Lane Haydock St Helens															5	0	5	5	0	0	5	0		Planning permission granted for the erection of 5 dwellings (ref P/2020/0391/FUL).	5	0	0	5																																																			
HL7 21	Stables Court, Frontfield															38	0	38	38	0	0	38	0		Planning permission granted for remodelling of Stables Court and Frontfield Court to	28	0	0	28																																																			

Table 4 Story Homes' Update of Table 4.6 of LPSD¹

Table 5.2: Residual Housing Land Requirement 2016-2037

Requirement	Dwellings	Story Homes' Comments	Story Homes' Total
St Helen's housing requirement (21 years from 1 April 2016 to 31 March 2037) at average of 486 per year	10,206	St Helen's housing requirement (21 years from 1 April 2016 to 31 March 2037) Story Homes' calculated requirement (see Story Homes' Matter 2 statement). 570 dwellings per annum multiplied by 21 plan period years.	11970
Net completions from 1 April 2016 – 31 March 2021	3074	Net completions from 1 April 2016 – 31 March 2021 SHBC completions data is kept consistent in our analysis.	3074
Residual requirement over Local Plan period from 1 April 2021 to 31 March 2037	7132	Residual requirement over Local Plan period from 1 April 2021 to 31 March 2037 Story Homes' analysis indicates an increased requirement figure is necessary. This results in a higher residual requirement as completions are consistent.	8896

Table 5.3: SHLAA Housing Land Supply 2021-2037

SHLAA Supply 2021-2037 (as of 31.03.2021)	Dwellings	Story Homes' Comments	Story Homes' Total
Total SHLAA supply – 1 April 2021 until 31 March 2037 (including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA, 10HA)	4766	Total SHLAA supply – 1 April 2021 until 31 March 2037 (including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA, 10HA) See Story Homes' analysis in Tables 1 and 2 above, which results in a reduced SHLAA supply, as we consider that several sites included within SHBC's SHLAA are not deliverable within the Plan period.	3806
SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-16 of Plan period including non-Green belt Local Plan allocation sites 3HA, 6HA, 9HA, 10HA) (2953 – 15%)	-443	Story Homes SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-16 of Plan period including non-Green belt Local Plan allocation sites 3HA, 6HA, 9HA, 10HA) (2513 – 15%)	-377
Residual SHLAA capacity over 16 year Plan period 1 April 2021 – 31 March 2037 (including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA, 10HA)	4323	Residual SHLAA capacity over 16 year Plan period 1 April 2021 – 31 March 2037 (including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA, 10HA) Story Homes' SHLAA supply total minus lapse rate discount above.	3429

¹ Story Homes' Comments are in red text

Small sites allowance x 16 years (sites below 0.25ha / 5 dwellings)	1488	Small sites allowance x 16 years (sites below 0.25ha / 5 dwellings) Plus SHBC's small sites allowance (93 x 16)	1488
Total Plan period capacity on non-Green Belt Land	5811	Story Homes' total Plan period capacity on non-Green Belt land.	4917

Table 5.4: Green Belt Land Supply 2021-2037

Green Belt Land Supply 2021-2037	Dwellings	Story Homes' Comments	Story Homes' Total
Required capacity to be found on Green Belt land (7132-5811)	1321	Required capacity to be found on Green Belt land (8896-4917)	3979
20% increased allowance to be added to Green Belt required capacity (to allow for contingencies e.g. infrastructure provision, delays, lead-in times to start of housing delivery etc)	264	20% increased allowance to be added to Green Belt required capacity (to allow for contingencies e.g. infrastructure provision, delays, lead-in times to start of housing delivery etc). (20% of 3979).	796
Overall required capacity of sites to be removed from the Green Belt	1585	Overall required capacity of sites to be removed from the Green Belt 3979 + 796	4775
Total Plan period capacity of allocated sites removed from the Green Belt (sites 1HA, 2HA, 4HA, 5HA, 7HA and 8HA)	2020	Total Plan period capacity of allocated sites removed from the Green Belt (sites 1HA, 2HA, 4HA, 5HA, 7HA and 8HA) See Table 1 above for revised assumptions. (Site 7HA capacity reduced by 91).	1929

Table 5.5: Total Supply over the Plan Period 2021-2037

Total Supply over the Plan Period 2021-2037	Dwellings	Story Homes' Comments	Story Homes' Total
Total Plan period capacity on non-Green Belt land	5811	Total Plan period capacity on non-Green Belt land As per revised Table 5.3.	4917
Total Plan period capacity of allocated Green Belt sites	2020	Total Plan period capacity of allocated Green Belt sites As per revised Table 5.4.	1929
Total housing supply over Plan period	7831	Story Homes' Total housing supply over Plan period	6846

Table 5 - Story Homes' Shortfall Analysis (with requirement adjustment)

Overall required capacity of sites to be removed from the Green Belt (Table 5.4)	4775
Story Homes' Total Plan period capacity of allocated sites removed from the Green Belt (sites 1HA, 2HA, 4HA, 5HA, 7HA and 8HA) (Table 5.4)	1929
ANTICIPATED SHORTFALL	2846

Table 6 – Story Homes' Shortfall Analysis (without requirement adjustment)

SHBC's Total Housing Supply over Plan period (Table 5.5)	7831
Story Homes' Housing Supply over Plan period (Table 5.5)	6846
ANTICIPATED SHORTFALL	985

St Helens Housing Supply Analysis

St Helens Local Plan Examination in Public

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