

St.Helens Council
Freepost RLYY-RYXG-HYHS
Chief Executive's Department,
Development Plans,
Town Hall,
Victoria Square,
St.Helens,
WA10 1HP

02/03/2016

Dear Sir / Madam

St. Helens Local Plan: Scoping Report

1. Thank you for consulting with the Home Builders Federation (HBF) on the St. Helens Local Plan: Scoping Report.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. We would like to submit the following brief comments to selected questions posed in the consultation document. The HBF will provide a more detailed response at later stages of the plan preparation process.

Q1. Do you think that this process is appropriate e.g. it meets the requirements of the Planning Acts and Regulations?

4. Based upon the available information the process appears appropriate and should meet the relevant requirements. In terms of engagement the HBF strongly advocate engagement with the industry, particularly over matters such as housing need including type and tenure, housing supply and viability. The HBF would be happy to assist in the facilitation of such engagement.

Q2. Do you think that the end date of the Local Plan should be 2033? If not please explain why and suggest an alternative end date

5. The NPPF, paragraph 157, identifies a preference for a 15 year time horizon. Therefore providing the plan can be adopted by 2018 the end date of 2033 would

be appropriate. It should, however, be noted that the NPPF does not preclude a longer time frame and indeed the current 2012 based sub national household projections provide a timeframe until 2037.

6. The HBF agrees with paragraph 2.3 of the scoping document in that the plan will require a review prior to 2033. It is advised that the plan identify the likely timescale for such a review and provide clear mechanisms which may trigger an early review. This could include failure to deliver against the housing trajectory or lack of a five year housing land supply.

Q4. Do you think that the Key Issues for the Local Plan should be different? If so, please explain why you think this and in what way should they be changed? Please be as specific as possible regarding the changes required.

7. The key issues identified are considered appropriate.
8. The HBF supports the recognition of meeting housing needs as a key issue for the plan. In this regard the Council will not only need to consider its own needs but also the actions of its neighbours and any aspirations of the wider city region. This is discussed in greater detail against later questions.

Q5. Are there any other evidence base documents that need to be prepared for, or taken into account by, the Local Plan?

9. The HBF would expect a report which evidences how the Council has worked with neighbouring authorities under the duty to co-operate. The report should not only identify meetings and discussions held but also identify actions and how these have influenced plan preparation. The importance of identified actions resulting from fulfilment of the duty is clearly articulated within the National Planning Practice Guidance (PPG). The PPG states *'it is unlikely that this (the duty) can be satisfied by consultation alone'* and that *'inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others'*.
10. The NPPF requires *'...a continuous process of engagement from initial thinking to implementation'* (paragraph 181). It is therefore essential that engagement over cross-boundary issues such as housing are addressed early and considered through the evidence gathering phases. This is particularly important given that the

2016 Strategic Housing Market Assessment (SHMA) identifies that St. Helens is part of a wider Mid-Mersey housing market area (2016 SHMA, paragraph 2.210).

11. Furthermore, St. Helens is part of the Liverpool City Region which also constitutes the functional economic market area for St. Helens and is part of the Liverpool City Region Combined Authority administrative area (CA). It is understood that the CA agreed to commission a '*City Region-wide Growth Strategy*' late in 2015 with publication anticipated during summer 2016. In addition it emerged during the Sefton Local Plan Examination in Public that a joint '*Strategic Housing and Employment Land Market Assessment*' is being undertaken (examination document EX48). These documents are not referenced within the evidence base documents identified within the scoping consultation. Failure to take account of this regional work would jeopardise both the soundness of the plan and compliance with the Duty to Co-operate. These and other city region-wide studies and strategies will need to be fed into the local plan and appropriate actions included.

Q6. Should the Spatial Vision for the new Local Plan be similar or different to the Core Strategy Spatial Vision? If you think it should be different, why do you think this and in what way should it be changed? Please be as specific as possible regarding the changes required.

12. In determining whether the Spatial Vision from the Core Strategy should be replicated the Council needs to consider how successful it has been in delivering the transformation suggested and meeting the development needs of the area. In respect of housing needs it is clear that the Core Strategy has so far failed to deliver against the current housing requirement, and therefore it must be considered whether a continuation of the current vision and strategy would ensure the delivery not only of Council priorities but also of the needs of the community.

Q7. Should the Strategic Aims and Objectives for the new Local Plan be similar or different to those in the Core Strategy? If you think they should be different, why do you think this and in what way should they be changed? Please be as specific as possible regarding the changes required.

13. The Strategic Aims and Objectives contained within the Core Strategy are generally considered appropriate. It is, however, considered that many lack aspiration, due to use of terms such as '*sufficient*' and provide little spatial

emphasis. In particular the following objectives are considered to require amendments.

- *Strategic Objective 1.1*

14. Whilst this objective is generally appropriate and contains laudable aspirations it places significant emphasis upon the redevelopment of derelict and vacant sites. If these sites are available and deliverable the HBF is supportive of their inclusion. However, to achieve the boost to housing supply required by the NPPF and meet the needs of the area will require a wide portfolio of sites suitable to a wide cross section of the market. It should also be noted that the NPPF encourages and does not prioritise the re-use of previously developed land. This change in emphasis should be reflected within the aims and objectives.

- *Strategic Objective 4.1*

15. Whilst this objective is generally supported it is not considered positively worded or aspirational. The use of '*sufficient*' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be '*positively prepared*' and '*boost significantly*' housing supply.

- *Strategic Objective 5.1*

16. Again this objective refers to sufficient land to meet local needs, but lacks real aspiration or positivity to suggest a boost to the economy of the area and city-region is being sought.

Q8. Do you think that there are policies that should not be included and / or other new policies that should be included? If so, why do you think this and what should the policy say?

17. The policy areas generally appear appropriate. In formulating policies it is important that the Council provides a positive framework which enables appropriate development to occur and does not place undue constraints and burdens upon the development industry.

18. In terms of the policy upon '*Affordable and specialist housing needs*' this will also need to consider starter homes.

Q9. Do you think there are particular sites or types of site which require specific policies to guide development / conservation, and if so, what are they, what policy guidance do they require and why do you think this?

19. If the plan were to identify strategic sites this may justify additional supportive policy guidance to ensure that development is co-ordinated in an appropriate manner. It is, however, important that this is developed in conjunction with site promoters and developers to ensure that the policy does not stifle or place undue burdens upon such development.

Q10. What level of housing growth do you think St. Helens should plan for? Does the objectively assessed need of 451 homes per year seem appropriate for St. Helens?

20. The HBF notes the 2016 SHMA and its recommendations. Whilst a detailed review of the data and assumptions contained within the 2016 SHMA has not been undertaken, at this stage, the overall methodology generally appears to accord with the principles set out within the PPG. The HBF does, however, have concerns regarding the choice of scenarios used within the study which may lead to a suppression of the overall housing requirement. In this regard it is considered that 451dpa is unlikely to represent the full objectively assessed housing need for the area and there appears justification for an increase.

21. The 2012 sub-national household projections (2012 SNHP) suggest a starting point of 445dpa over the period 2012 to 2037, 466dpa once this is converted into a dwelling requirement. The SHMA does provide an uplift upon the 2012 SNHP starting point across the whole of the Mid-Mersey HMA, but this is not the case for all authorities and indeed within St. Helens the study is recommending a 3% decrease upon the 2012 SNHP starting point for St. Helens.

22. The study considers four separate scenarios, concluding that scenario 4, which is essentially a combination of the migration trends taken from the 2014 sub national population projections mid-year estimates (2014 MYE) and an adjustment for Unattributable Population Change (UPC) to be the most appropriate. Within St. Helens scenario 4 represents a significantly lower level of population growth than identified within the 2012 sub national population projections (2012 SNPP), or scenario 2 which builds upon the 2012 SNPP and considers more recent evidence.

23. The reason for the lower population growth and consequently housing requirement within scenario 4, as well as scenario 3, is due to the effect of UPC and how the study has interpreted this. The effect of demographic scenario 4 is to reduce the housing need calculation from a starting point of 466dpa to 369dpa (table 46, 2016 SHMA). The utilisation of UPC, whilst accepted at some examinations, is fraught with uncertainty and as such should be used with considerable care, particularly where it has such a profound negative impact upon the housing needs of an area. It is notable that the ONS do not make future adjustments for UPC as they do not consider that it measures a bias in the trend data which will continue into the future.

24. Whilst the HBF recognises the issue of UPC within St. Helens the study does not adequately justify the approach taken. The study does not consider the potential causes of the UPC nor the implications of the scenario.

25. It is also noted that the use of long-term migration trends were discounted as;

'...for the HMA and to some extent each local authority the data suggested that there was little difference in terms of population change in either the short- (past 5-years) or longer-term (past 13-years)...' (2016 SHMA, paragraph 6.13)

Whilst this is not contested the use of such a scenario, without further modification, would have provided useful context for the different authorities.

26. The study also does not provide analysis of historic factors, which may have had implications upon the future rate of both population and housing growth. It is notable that St. Helens failed to meet its housing requirement for a number of years prior to 2013/14. The area also suffered during the recession leading to job losses, as discussed within the Council's Employment Land Study. These factors will inevitably have had a bearing upon the rate of growth identified within the official projections.

27. Paragraph 7.5 of the consultation document acknowledges that additional homes may be required to support economic growth *'...if the Council decides to plan for higher levels of job growth than what the baseline economic growth forecast for the Borough is suggesting.'* The HBF agrees with this approach and recommends that the work being undertaken at a city region level be incorporated into the uplift to the housing requirement. It should also be recognised that the

baseline position will have been influenced by the recent recession and as such an uplift upon this position is likely to be justified.

28. It is understood that the baseline economic position is based upon two separate economic forecasts emanating from Oxford Economics and Cambridge Econometrics, which identify differing levels of growth for St. Helens. It is also noted that assumptions have been made with regards to economic activity rates. The assumptions surrounding economic activity rates are often the source of significant debate at local plan examinations. Indeed the PAS guidance '*Objectively Assessed Need and Housing Targets*' identifies large increases in economic activity rates to be a risky strategy which will have a negative effect upon the identified housing need. The 2016 SHMA does not provide sensitivity testing of these assumptions to ascertain whether they are overly optimistic. This is considered a flawed approach which does not allow comparisons to be made. It is also notable that the assumptions used upon economic activity deviate from the official Office of Budgetary Responsibility (OBR) forecasts on such rates.
29. The SHMA considers market signals and an uplift is provided across the whole HMA. It is also recognised that the study makes some adjustments to household formation rates. However, the rate of uplift applied in St. Helens is extremely minimal. Whilst it is recognised that the market signals across St. Helens are not as acute as elsewhere it is apparent that there remain issues with regards to affordability, identifying a need for 96 affordable units per annum, and under-delivery. This must also be considered within the context that the suggested housing need sits below the 2012 SNHP starting point.
30. Furthermore historic rates of delivery suggest that higher rates of development can and have consistently been achieved in St. Helens. For example between 2004 and 2008 nearly 600dpa (net) were achieved, during a period of significant regeneration. The suggested need for 451dpa would therefore not appear to provide the significant boost to supply required by the NPPF nor the aspiration set by the Northern Powerhouse agenda.
31. Finally, the identified need for St. Helens of 451dpa is the result of a disaggregation of the requirement for the whole HMA. It is therefore important that the final housing requirement for St. Helens is set in the context of neighbouring authority requirements, the city region and its aspirations for growth.

Q11. Do you think the proposed process from moving from objectively assessed needs to a housing target is robust and appropriate? Should any other factors be considered when assessing an appropriate housing target?

32. The considerations within paragraph 7.7 are all considered reasonable. In terms of land supply if the Council suggested this was a constraining factor it would need to be certain that all available sources of supply had been considered. This could include land within the Green Belt. With regards infrastructure capacity, in many instances this can be overcome through the provision of new or improved infrastructure and therefore need not always be a limiting factor.

33. The HBF agree it is important that the economic growth ambitions of the Council are factored into the assessment and that the housing and economic strategies align. Indeed this has been highlighted by a number of local plan Inspectors, and is clearly set out both within the NPPF and PPG. In this regard it is noted that the employment land requirements proposed have risen substantially, yet the housing figures identified have actually fallen, this requires further explanation or better alignment.

34. An area which appears to be missing is a consideration of sub-regional economic growth ambitions or the needs of neighbouring authorities, particularly those within the same HMA. These issues should also be considered.

Q14. Do you think that Green Belt release is required to meet housing and employment land needs? Why? If not, what alternative(s) would you suggest and why?

35. The NPPF, paragraphs 83 to 85, provides the mechanism for releasing Green Belt through the Local Plan process and requires local authorities to demonstrate exceptional circumstances. Providing other avenues of delivery have been explored the need to meet the housing needs of an area has been accepted to meet exceptional circumstances in other Local Plan examinations. In this regard and taking account of paragraph 7.17 of the consultation document which identifies; *'Green Belt release is now needed to meet both housing and employment needs'* the HBF agrees that Green Belt release should be considered through the plan.

Q15. How can the Council encourage the development of brownfield land to meet housing and employment needs?

36. The HBF is supportive of the development of brownfield sites and indeed nationally the majority of housing development still takes place on such sites. The Government is providing a number of mechanisms to further encourage the development of brownfield land through the introduction of initiatives such as brownfield registers and permission in principle. The Council may wish to further assist this by ensuring that the policy burdens applied to brownfield sites are commensurate to the viability challenges on such sites.

Q16. Do you agree with the density and net developable area figure used for calculating possible land take for safeguarded housing land in the Green Belt? Why? If not, what would you suggest and why?

37. The net developable area for a site will vary significantly dependent upon the type and size of site, ranging from 50% for a large strategic site with significant infrastructure works to 100% for a small urban infill. In terms of the safeguarded land sites these are all likely to require a reasonable amount of infrastructure provision and as average of 75% is likely to be too high. The actual percentage will be dependent upon the scale of the sites which are being considered for safeguarding, smaller sites spread across the area will usually have a higher developable area as opposed to large strategic sites. Furthermore constraints such as areas of high flood risk should be discounted from the net developable area calculations altogether.

38. The HBF recommend that further consideration is given to the size of the safeguarded land parcels proposed and a range of between 50 to 75% be utilised dependent upon the size and likely infrastructure requirements of the parcels.

39. In terms of density the most recent version of the national Land Use Change Statistics identify that nationally densities are, on average, 32dph (net) across all sites including high density town / city centre schemes. On previously developed land the average density was 37dph and on greenfield land the average density was 26dph. The assumption of 30dph, is within this range and as such is generally appropriate, although a reduction would be warranted given that safeguarded land sites are likely to predominantly greenfield in nature.

Q17. Do you agree with providing for a five year safeguarded land supply for housing and employment? Why? If not, what would you suggest and why?

40. The HBF supports the principle of identifying safeguarded land, this should provide certainty over the Green Belt boundaries beyond the plan period. This is consistent with the NPPF, paragraph 85.

41. Whilst providing support in principle the HBF considers that a longer period than five years should be provided. The NPPF, paragraph 85, identifies that where necessary Local Plans should provide safeguarded land to meet longer term development needs stretching '*well beyond the plan period*' and that local authorities should satisfy themselves that Green Belt boundaries '*will not need to be altered at the end of the development plan period*'. Furthermore NPPF paragraph 83 is clear that once established Green Belt boundaries should be '*...capable of enduring beyond the plan period*'. There is therefore an in-built presumption within the NPPF that where it is justified to amend Green Belt boundaries this should be undertaken as part of the local plan process and that the new Green Belt boundaries should not require alteration at the end of the plan period.

42. Whilst there have been numerous interpretations of the above requirements the HBF consider that a 15 year time horizon post plan period should be adopted. This would accord with the NPPF preference for Local Plans to be drawn up over a 15 year time horizon (paragraph 157).

Further Consultations

43. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided in the footer to this response for future correspondence.

Yours sincerely,

MJ Good

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