



Barratt Homes (RO1944)

---

# ST HELENS LOCAL PLAN EXAMINATION

Matter 7 – Specific Housing Needs and Standards





Barratt Homes (RO1944)

---

# ST HELENS LOCAL PLAN EXAMINATION

## Matter 7 – Specific Housing Needs and Standards

**TYPE OF DOCUMENT (VERSION) PUBLIC**

**PROJECT NO. 62260761**

**DATE: MAY 2021**

WSP




8 First Street  
Manchester  
M15 4RP

Phone: +44 161 200 5000

WSP.com

# QUALITY CONTROL

---

Issue/revision	Draft	Final	Revision 2	Revision 3
Remarks	Draft	Final		
Date	25/05/2021	28/05/2021		
Prepared by	Victoria Coleman	Victoria Coleman		
Signature				
Checked by	Matthew Dugdale	Matthew Dugdale		
Signature				
Authorised by	Nick Fillingham	Nick Fillingham		
Signature				
Project number	62260761	62260761		
Report number	Matter 7	Matter 7		
File reference	21450001	21450001		

# CONTENTS

---

<b>1</b>	<b>INTRODUCTION</b>	<b>1</b>
	SUMMARY	1
<b>2</b>	<b>QUESTIONS</b>	<b>3</b>
<b>2.1</b>	<b>ISSUE 1: HOUSING MIX</b>	<b>3</b>
	QUESTIONS 1 AND 2	3
	QUESTIONS 3 AND 4	4
	QUESTION 5	5
	QUESTION 6	5
<b>2.2</b>	<b>ISSUE 2: HOUSING STANDARDS/SUSTAINABLE DESIGN</b>	<b>5</b>
	QUESTION 7	5
	QUESTION 8	6
	QUESTION 9	6
	QUESTIONS 10 AND 11	7
<b>2.3</b>	<b>ISSUE 3: AFFORDABLE HOUSING</b>	<b>7</b>
	QUESTIONS 12, 13 AND 14	7
	QUESTION 15	8

1

# INTRODUCTION



# 1 INTRODUCTION

---

- 1.1.1. This Hearing Statement is submitted on behalf of Barratt Homes (“Barratt”) (Respondent ID: RO1944) in respect of the St.Helens Borough Local Plan 2020-2035 (“the Plan”) Examination.
- 1.1.2. It has been prepared by WSP in relation to Matter 7 (Specific Housing Needs and Standards), specifically in relation to:
- Issue 1 (Housing Mix) – Questions 1, 2, 3, 4, 5, and 6;
  - Issue 2 (Housing Standards/Sustainable Design) – Questions 7, 8, 9,10 and 11;
  - Issue 3 (Affordable Housing) – Questions 12, 13, 14 and 15.
- 1.1.3. As you will be aware, Barratt controls the site at Florida Farm South in Haydock, which is proposed to be allocated for residential development by Policy LPA05 (ref: 2HA).

## SUMMARY

- 1.1.4. In summary, our answers to the Inspectors’ Matters, Issues and Questions (“MIQs”) conclude that:
- Questions 1 and 2 – Section 1 of Policy LPC01 is inflexible and is not positively prepared, justified or effective;
  - Question 3 and 4 – the 5% requirement for bungalows on larger greenfield sites is not justified;
  - Question 5 – Section 6 of Policy LPC01 makes sufficient provision for those who wish to build their own homes;
  - Question 6 – Policy LPC01 should not refer to a need for detached homes – it is better to assess housing mix at the planning application stage;
  - Question 7 – the application of optional standards is not justified;
  - Question 8 – there is no justification for including voluntary Nationally Described Space Standards (“NDSS”);
  - Question 9 – if optional standards are introduced, then Policy LCP01 should refer to a transitional period;
  - Questions 10 and 11 – the requirement for strategic housing sites to provide at least 10% of their energy needs from renewable/low carbon sources is not justified or consistent with national policy;
  - Questions 12, 13 and 14 – the approach to affordable housing in Policy LPC02 is not justified, positively prepared or consistent with national policy;
  - Question 15 – there is no justification for a rural exceptions site policy.
- 1.1.5. To aid the Inspectors, we have cross-referenced our answers to the ‘tests of soundness’ and have suggested modifications to make the Plan ‘sound’.
- 1.1.6. We look forward to elaborating further on our Statement and representations with the Inspectors at the hearing session on Thursday 17 June 2021.

2

**QUESTIONS**





## 2 QUESTIONS

---

### 2.1 ISSUE 1: HOUSING MIX

#### QUESTIONS 1 AND 2

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

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

- 2.1.1. In our view, Section 1 of Policy LPC01 is **not positively prepared, justified or effective**.
- 2.1.2. Barratt recognises the need for a mix of house types, sizes and tenures and is supportive of providing a range and choice of well-designed and high-quality homes.
- 2.1.3. It is key that any policy is flexible and can respond to changing circumstances. Whilst we are pleased to see reference to the “*latest SHMA*”, which will enable the Policy to take account of new evidence over the lifespan of the Plan, the flexibility in Policy LPC01 does not go far enough.
- 2.1.4. Section 4 of the Policy allows exceptions to be made only where the applicant has submitted an independent viability assessment which demonstrates that meeting the requirements would render the scheme unviable. Whilst this is helpful, there are also site-specific evidence, conditions and factors (such as scale, location, character, density, abnormalities etc) which would render the requirements inappropriate and undeliverable in some instances. Whilst dwelling mix policies are often led by the evidence from the latest SHMA, in Barratt’s experience they tend to underplay these other important considerations.
- 2.1.5. The ability of a developer to have the freedom to decide on housing mix enables sites to have the best chances of being viable and deliverable, which is a legitimate consideration in St.Helens given the legacies of its industrial past, as evidenced by the Economic Viability Assessment (December 2018) [VIA001]. An overly prescriptive and inflexible policy will negatively impact on these chances (including by damaging forecast revenues and minimum land value etc).
- 2.1.6. For example, a development may only seek to address the housing mix in the particular area in which it is situated, rather than providing for all of the Borough’s needs. Alternatively, it may legitimately deviate from local or Borough needs to help diversify the existing housing stock (e.g. to providing more aspirational and executive family homes), or to ensure the delivery of a viable site. It may even need to change and deviate from the agreed mix as the site is being delivered (e.g. if market demand changes or abnormal issues or costs are encountered during construction).
- 2.1.7. In our view, housing mix should be considered at the application stage.
- 2.1.8. We therefore request that a more flexible approach is taken within the Policy which recognises that needs will vary by location, and that the viability of a scheme is not the only consideration which will determine the provision of an appropriate mix.
- 2.1.9. Barratt considers that these amendments could be dealt with through a Main Modification (“MM”).



## QUESTIONS 3 AND 4

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

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

- 2.1.10. In our view, the 5% requirement for bungalows on larger greenfield sites in Section 3 of Policy LPC01 is **not justified or consistent with national policy**.
- 2.1.11. Barratt does not disagree that there is an ageing population, or that there are other groups with specific needs (including those with disabilities) who would benefit from more specialist housing. However, there is no evidence to support a 5% requirement for bungalows.
- 2.1.12. The SHMA Update (January 2019) [HOU001] at paragraph 7.37 states:
- “The sources used for analysis in this report makes it difficult to quantify a need/demand for bungalows in the Borough as Census data (which is used to look at occupancy profiles) does not separately identify this type of accommodation. However, it is typical (where discussion are undertaken with local estate agents) to find that there is a demand for this type of accommodation.”*
- 2.1.13. The supplementary evidence provided by the Council in response to PQ60 [SHBC001] relates to ‘demand’ for bungalows which, as acknowledged by HOU001, does not equate to ‘need’. The Council has failed to recognise that smaller homes and apartments can still help meet a proportion of these needs.
- 2.1.14. There is no evidence to support the 5% requirement for bungalows specifically being applied to greenfield sites of 25 dwellings or more.
- 2.1.15. It is clear from the statement at paragraph 3.74 of the Housing Need and Supply Paper (October 2020) [SD025] that a policy judgement has been made by the Council, and that this has purportedly been factored into VIA001. However, as stated in our Matter 3 statement (in response to Question 13), it is too simplistic to assume that developers of greenfield sites will encounter less constraints and therefore costs than their brownfield counterparts. Greenfield and brownfield sites should be subject to the same requirements.
- 2.1.16. As recognised by paragraph 7.40 of HOU001, bungalows are relatively ‘land hungry’ and have an impact on site densities and capacities, and therefore viability and deliverability. However, no assessment appears to have been undertaken by the Council to consider what impact this will have on proposed site allocations. In order to offset the forced delivery of bungalows, developers may be forced to increase densities elsewhere, which could result in smaller units being delivered (which would not align with housing mix) and compromise other objectives of the Plan.
- 2.1.17. Our comments in respect of Section 4 of the Policy also apply here (see Questions 1 and 2). In short, no consideration has been made to the scale, location, character or density etc of a site.
- 2.1.18. We therefore request that a more flexible approach is taken within the Policy which recognises that the viability of a scheme is not the only consideration which will determine the provision of an appropriate mix of homes. In our view, the Policy should be expressed more as an ambition that such sites should aspire to achieve, rather than as a mandatory requirement.
- 2.1.19. Barratt considers that these amendments could be dealt with through a MM.

## QUESTION 5

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

- 2.1.20. In our view, Policy LPC01 makes sufficient provision for those who wish to build their own homes. Section 6 of the Policy as submitted supports the provision of self-build plots in principle, and therefore the Plan is **positively prepared** and **consistent with national policy** in this regard.
- 2.1.21. However, Barratt would strongly resist any suggestion to introduce a mandatory requirement for self-build plots on allocated sites (such as Site 2HA), particularly given that it has not been factored into the costs associated with developing the site, or its masterplanning. Introducing such a requirement at this late stage could render sites unviable and would **not be justified**. Therefore, Barratt considers that maintaining flexibility within the current Policy wording is essential.

## QUESTION 6

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

- 2.1.22. In our view, Policy LPC01 should not refer to a need for detached homes, and to do so would **not be effective or consistent with national policy**.
- 2.1.23. Barratt understands that there is a low proportion of detached homes within the existing housing stock. As set out at paragraph 2.5.1 of the Plan, at the 2011 Census, the percentage of detached homes (14%) in St.Helens was “*significantly lower*” than the regional and national averages (18% and 23% respectively).
- 2.1.24. We acknowledge that this may encourage developers to increase the delivery of detached homes. Barratt and David Wilson Homes deliver a good range of homes as part of its market facing assessment of need. Both brands deliver a range of detached family house types, including more aspirational and executive homes. However, on balance, it would be better to assess housing mix at the planning application stage, against Section 1 of the Policy.
- 2.1.25. Therefore, subject to our requested amendments to Section 4 for flexibility (see Questions 1 and 2), no further amendment to Policy would be required to facilitate the delivery of detached homes.

## 2.2 ISSUE 2: HOUSING STANDARDS/SUSTAINABLE DESIGN

### QUESTION 7

*Q7. Is the application of the optional standards for accessible and adaptable standards and wheelchair users for larger greenfield developments through Section 2 of Policy LPC01 justified having regard to paragraph 127 of the Framework, the PPG and the evidence base?*

- 2.2.1. In our view, Section 2 of Policy LPC01 is **not justified, effective or consistent with national policy**.
- 2.2.2. Barratt does not disagree that there is an ageing population, or that there are groups with specific needs (including those with disabilities) who would benefit from more specialist housing (Questions 3 and 4). As a national volume housebuilder accredited with the National House Building Council (“NHBC”), Barratt complies with all relevant minimum requirements regarding accessibility, adaptability and wheelchairs within the Building Regulations 2010 (as amended).

- 2.2.3. However, we are concerned that there is no evidence to justify the introduction of higher optional standards, or to apply them to greenfield sites of 25 dwellings or more. This conflicts with paragraph 7 of the ‘Housing: optional technical standards’ section of PPG (Reference ID: 56-007-20150327) which sets out the evidence that local planning authorities (“LPAs”) need to justify introducing higher standards.
- 2.2.4. We are also concerned that the Policy has not considered that there may be site-specific factors which make a specific site less suitable for meeting higher standards, as required by paragraph 8 of PPG (Reference ID: 56-008-20160519). Our comments in respect of Section 4 of the Policy also apply here (see Questions 1 and 2, and 3 and 4). In short, no consideration has been made to the scale, location, character or density etc of a site. In addition, it is too simplistic to assume that developers of greenfield sites will encounter less constraints and therefore costs than their brownfield counterparts. Greenfield and brownfield sites should be subject to the same requirements.
- 2.2.5. Furthermore, we are concerned with the Policy’s reference to applying the same proportions of requirements (20% and 5%) into the future, even if they are amended or superseded by new standards. Clearly, it is not possible to predict the deliverability of unknown future standards or to assess their impact on sites and allocations.
- 2.2.6. In summary, the application of these optional standards, both now and in the future, would negatively impact on housing delivery and may reduce the viability and capacity of allocations. Building Regulations are the correct Government vehicle for ensuring such standards.
- 2.2.7. Barratt therefore requests that the optional standards are removed from Policy LPC01. At the very least, the Policy should be amended to take account of viability and site-specific factors.
- 2.2.8. Barratt considers that these amendments could be dealt with through a MM.

## QUESTION 8

*Q8. Is there any justification for the use of the Nationally Described Space Standard (see SHBC001 – PQ61)?*

- 2.2.9. In our view, there is no justification for including NDSS, and to do so would **not be justified or consistent with national policy**.
- 2.2.10. Firstly, it should be noted that NDSS are not mandatory but are voluntary. Barratt provides a good range and mix of house types which appeal to prospective buyers.
- 2.2.11. Barratt agrees with the Council in PQ61 [SHBC001] that there is a lack of sufficient local evidence regarding need, viability or timing in accordance with paragraph 20 of PPG (Reference ID: 56-020-20150327).
- 2.2.12. Barratt also agrees that other policies of the Plan will ensure that a high standard of amenity for existing and future occupiers is secured.

## QUESTION 9

*Q9. Should Policy LPC01 refer to a transitional period for the introduction of the optional standards?*

- 2.2.13. Barratt strongly objects to the use of optional standards within the Plan (see Questions 7 and 8) as they are **not justified, effective or consistent with national policy**.

- 2.2.14. However, if the Inspectors were minded to support these optional standards, then as a compromise in principle (and subject to the precise wording of a MM), it would be prudent to allow for a transitional period before they are applied.
- 2.2.15. It is unlikely that landowners and developers will have factored in the optional standards to their development appraisals, and so their application could have significant adverse impacts on the viability of sites and allocations if introduced. In such a compromise scenario, Barratt would recommend that the optional standards are only applied towards the end of the Plan period (i.e. Years 11-15), to have the least impact.
- 2.2.16. Barratt considers that these amendments could be dealt with through a MM.

### QUESTIONS 10 AND 11

*Q10. Is the requirement within Policy LPC13 for strategic housing sites to provide at least 10% of their energy needs from renewable/low carbon sources justified and consistent with national policy?*

*Q11. Is Section 4 of Policy LPC13 consistent with the Government's current policy on energy performance set out in the Written Ministerial Statement of March 2015?*

- 2.2.17. In our view, the requirement for strategic housing sites to provide at least 10% of their energy needs from renewable/low carbon sources is **not justified or consistent with national policy**.
- 2.2.18. Although the Policy includes an “*unless... practicable or viable*” ‘get out’ clause, there is no evidence to support the introduction of this requirement, or that it should solely be applied to strategic housing sites (i.e. allocations).
- 2.2.19. The assumption that renewable and low carbon energy generation is “*more viable and feasible in larger developments*” (paragraph 7.27.6 of the Plan), is overly simplistic and does not take account of the significant costs and other considerations (as explained elsewhere in this statement) of developing strategic allocations.
- 2.2.20. Instead, Barratt requests that the Policy be expressed more as an ambition that such sites should aspire to achieve, rather than as a mandatory requirement.
- 2.2.21. In terms of energy performance, Barratt considers that the Council should comply with the Government's intention of setting standards for energy efficiency through Building Regulations, as part of its ambitious climate change targets.
- 2.2.22. By way of context, the new homes that Barratt builds now are some of the most energy efficient in the company's history. This is already achieved through compliance with minimum Building Regulations requirements and a ‘fabric first’ approach. As Building Regulations requirements are increased by the Government over time, then energy efficiencies will consequently be achieved.
- 2.2.23. Barratt considers that these amendments could be dealt with through a MM.

## 2.3 ISSUE 3: AFFORDABLE HOUSING

### QUESTIONS 12, 13 AND 14

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

*Q13. In particular:*

- a. *Is the provision of 30% of affordable homes on greenfield sites in Zones 2 and 3 justified?*
- b. *Are the differences between Zones 2 and 3 in relation to brownfield sites justified and clear to the decision maker?*

Q14. *Is Policy LPC02 sufficiently flexible to take into account that circumstances will vary site-by-site (Section 4 refers)?*

- 2.3.1. In our view, the approach to affordable housing in Policy LPC02 is **not justified, positively prepared or consistent with national policy**.
- 2.3.2. As one of the largest providers and enablers of affordable housing in the UK, Barratt welcomes efforts to improve affordability in St.Helens. However, as paragraph 34 of the National Planning Policy Framework (“NPPF”) recognises, this goal should not be the expense of undermining the deliverability of the Plan.
- 2.3.3. Whilst we are pleased that Section 4 of the Policy allows affordable housing provision to vary on a site-by-site basis (taking into account evidence of local need and viability), we are concerned that the starting point is the application of a ‘zonal’ approach in Section 2.
- 2.3.4. As raised in our Matter 3 statement (in response to Question 13), we question the rationale for treating brownfield sites differently. It is too simplistic to assume that developers of greenfield sites will encounter less constraints and therefore costs than their brownfield counterparts in different ‘zones’.
- 2.3.5. For example, paragraphs 6.25-6.26 of VIA001 reveal that there are issues with the viability of greenfield sites within Zone 2. At 30 dwellings per hectare (“dph”), the 30% affordable housing requirement is unviable and is only slightly improved at 35 dph. Indeed, when taken together with the other contributions expected from new development (including some of those challenged within this statement), the viability position worsens further.
- 2.3.6. Therefore, Barratt requests that a much lower contribution should be sought from greenfield sites as a starting point (i.e. before evidence of local need and site viability is considered). Logically, the Council should then consider whether brownfield sites can make more of a contribution to meeting affordable needs. Notwithstanding this, the Council should still apply more flexibility to other policy requirements (as answered elsewhere in this statement).
- 2.3.7. In addition, a greater proportion of affordable homes for ownership should be encouraged under Section 3 of the Policy to enable greater routes to home ownership.
- 2.3.8. Barratt considers that these amendments could be dealt with through a MM.

## **QUESTION 15**

Q15. *Is there any justification for a rural exceptions site policy for affordable housing (see SHBC001 – PQ63)?*

- 2.3.9. In our view, there is no justification to include rural exceptions site policy for affordable housing, and to do so would **not be justified or consistent with national policy**.
- 2.3.10. Barratt agrees with the Council in PQ63 [SHBC001] that there is no local evidence indicating the need for such a policy, in the context of paragraph 71 of the NPPF.



- 2.3.11. Barratt also agrees that allocations like Site 2HA (which is proposed to be released from the Green Belt as an extension to the existing urban settlement) will help meet affordable needs residents located in rural areas.



8 First Street  
Manchester  
M15 4RP

[wsp.com](http://wsp.com)

PUBLIC