

CPRE Comments

Session 9 – 13.30 Thursday 17 June 2021

Matter 7

Specific Housing Needs and Standards

This matter considers housing mix, housing standards/sustainable design, affordable housing, and the needs of gypsies, travellers and travelling showpeople.

Policies to be covered by Matter 7: LPC01, LPC02, LPC03, LPC13 (Section 4)

Main Evidence Base

SD025 - Housing Need and Supply Background Paper

SD028 – Climate Change Background Paper

HOU001 – St Helens SHMA Update January 2019

HOU003 – Mid Mersey SHMA January 2016

GYP001 - Merseyside and West Lancashire Gypsy and Traveller Accommodation Assessment (GTAA) January 2015

VIA001 - St Helens Economic Viability Assessment (EVA), December 2018

SHBC001 – Council response to Inspector’s preliminary questions

Issue 1: Housing Mix

Policy LPC01 indicates that housing should address a range of house types and sizes as informed by the latest SHMA. Section 3 of the policy refers to 5% of homes on larger greenfield developments being bungalows.

However, the SHMA Update (HOU001) indicates that it is difficult to quantify the need/demand for bungalows.

1. 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?

Please refer to Week 2 Matter 2 M2.22A St Helens Green Belt Association Appendix, which is Piers Elias demographer (he helped develop the Popgroup software relied upon by local authorities when calculating future household growth) critical appraisal of the housing evidence base. He sets out a better understanding of the level of housing need.

The Government’s mandate of utilising ONS 2014 data, which employs high growth rates is flawed. CPRE thinks up to date ONS data should inform future projections, irrespective of whether this results in an upward or downward adjustment. It is best practice to use the latest data to inform local plan policy.

Crucially, the type of housing developed should reflect the aging population and fact that 8.9% more one-person households are anticipated, and a -1.2% reduction in the number of homes with three or more dependent children. St Helens needs to plan accordingly. Please see data set out here:

https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/householdprojectionsforengland/2018based?fbclid=IwAR1jLVnZLBag99GLw-PR-Z0Z1SYXvM4b3UMAHTOn_HxXEY7HrYA-DLurWWM#:~:text=Total%20number%20of%20households%20is%20projected%20to%20increase%207.1%25%20by%202028&text=Between%202018%20and%202028%2C%20the,164%2C000%20additional%20households%20per%20year

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

See answer above.

3. 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)?

See answer above.

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

See answer above.

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

See answer above.

6. 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)?

See answer above.

Issue 2: Housing Standards/Sustainable Design

Section 2 of Policy LPC01 seeks to apply the optional standards set out in Parts M4(2) and M4(3) of the Building Regulations. Section 4 of Policy LPC13 requires that strategic housing developments meet 10% of their energy needs from renewable/low carbon sources.

7. 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?

Adequate accessible and adaptable standards should be applied to new larger greenfield developments in the local plan policy.

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

CPRE would suggest the use of Nationally Described Space Standards.

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

10. 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?

The declared Climate Emergency and related aim to be Carbon Neutral should not set out in the local plan.

Domestic heating accounts for a large proportion of all carbon emissions, so rightly applicants ought to be encouraged to reduce their carbon footprint where possible, but CPRE thinks it is the spatial location that has the significant impact, and then issues such as the design, construction and occupation of homes.

We support the use of the energy hierarchy (energy efficient development), namely: - Reducing the need for energy and then ensuring the efficient use of energy supply; Maximising the potential for energy supply from decentralised, low carbon and renewable energy sources, including community-led initiatives; and then Efficiently using fossil fuels from clean technologies, where possible. All this should be included in the local plan.

It is worth highlighting that the Government has recently toughened its carbon reduction targets (to reduce carbon emissions by 78% based on 1990 levels by 2035) and its intention to introduce the new targets into law in June 2021.

We welcome any helpful Energy and Renewable Standards, but in light of the toughened targets ask if more ambition should be applied to quicken the pace of carbon zero housing development delivery.

11. 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 20154?

See comments to Qu.10 above.

Issue 3: Affordable Housing

Policy LPC02 includes a zonal approach to the provision of affordable housing based on the findings of the EVA. Sites in Zone 1 (Town Centre and Parr Wards) would not be expected to provide any affordable homes despite the provisions of paragraph 64 of the Framework (see SHBC001 –PQ62).

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

13. In particular:

a. Is the provision of 30% of affordable homes on greenfield sites in Zones 2 and 3 justified?

Yes

b. Are the differences between Zones 2 and 3 in relation to brownfield sites justified and clear to the decision maker?

No.

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

CPRE has no comment.

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

CPRE does not accept the Government's definition of affordable housing as being 80% of market value. Parts of St Helens are affluent, completely out of reach at 80% for poorer households.

CPRE wants rural exception sites to offer affordable housing in perpetuity, not only at the first point of sale. We think Right to Buy in rural places erodes the supply of affordable homes. We advocate the development of social housing with a mix of tenures that provide cheaper housing options in the long term, we therefore recommend inclusion of other affordable routes to home ownership.

Issue 4: Gypsies, travellers and travelling showpeople

Policy LPC03 allocates two sites at Sherdley Road, Thatto Heath for travellers, one as a residential site for 8 pitches and the second as a transit sites for 3 pitches. The residential site seeks to meet needs which have been identified since the preparation of the GTAA and a subsequent permission for 12 pitches. These recent needs are explained as deriving from changes in occupancy of sites and the rise in the number of unauthorised sites (pages 25-26 of SD025 and pages 91-92 of the LP).

16. Is the evidence base supporting the need for 8 residential pitches and 3 transit pitches robust, taking into account factors such as existing provision, household growth, hidden need (those in bricks and mortar housing), unauthorised sites and encampments and any engagement with the traveller community?

Like other people gypsies, travellers and travelling showpeople should have their needs assessed and suitably planned for. Sites should be sustainable in terms of locations and carefully considered in terms of Green Belt and other planning and environmental designations.

17. Should Policy LPC03 be modified so that it sets pitch targets for gypsies and travellers (paragraph 9 of Planning Policy for Traveller Sites (PPTS) refers)?

CPRE has no comment.

18. Is the need identified for the next 5 years or for later in the Plan period?

CPRE has no comment.

19. Depending on the response to Q18, is the allocated residential site deliverable or developable?

CPRE has no comment.

Policy LPC03 includes criteria against which proposals for traveller sites would be assessed. In response to preliminary questions the Council confirmed that it considered that criterion g) relating to access to services was realistic (SHBC01 – PQ64). In addition, a MM was suggested to take into account the need for travelling showpeople to have space for rides etc.

20. Are the criteria within Section 4 of Policy LPC03 fair and consistent with national policy in PPTS?

CPRE has no comment.

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Matters 8 & 9

8 - Minerals Policies

CPRE has no comments at this time but reserves the right to comment during the hearings in response to matters raised.

9 - Generic Policies

Policies to be covered by Matters 8 and 9: LPC14, LPC15, LPA11, LPD10, LPC06, LPC07, LPC08, LPC09, LPC10, LPC11, LPC12, LPC13 (other than Section 4), LPD01, LPD02, LPD04, LPD05, LPD06, LPD07, LPD08, LPD09

Main Evidence Base

SHBC002 - Response to Inspectors' Preliminary Questions on Generic and Development Management Policies

Issue 1: Minerals and Waste Policies

Policy LPC14 contains a number of provisions relating to minerals. The Council has agreed to modify the policy to refer to 'local, regional and national needs' so that it is consistent with paragraph 204 of the Framework (SHBC002 – Matter 8).

1. Is Policy LPC14 positively prepared and consistent with the Framework?

Policy LPC15 makes reference to the Merseyside and Halton Waste Plan which allocates sites for, and guides decisions on, waste.

2. Is Policy LPC15 positively prepared and consistent with the Framework and the Merseyside and Halton Waste Plan?

CPRE has no comments at this time but reserves the right to comment during the hearings in response to matters raised.

Issue 2: Health and Wellbeing

Policy LPA11 sets a number of criteria to guide development including those which seek to ensure access to green spaces, encourage physical activity and guide the location of food and drink uses. Policy LPD10 provides more detail in terms of the location of food and drink establishments, including, for hot food takeaways, proposing an exclusion zone around schools.

In response to preliminary questions the Council sought to provide more explanation as to the 'planning decisions and processes' referred to in Policy LPA11, the evidence about the health impacts of food and drink establishments and where such uses should be guided. Further responses were also provided on the evidence to support Policy LPD10 and the exclusion zones. The Council

has also suggested MMs to take into account changes to the Use Classes Order and the creation of the new Class E (SHBC002).

3. Are Policies LPA11 and LPD10 positively prepared, justified and consistent with national policy?

CPRE has no comments at this time but reserves the right to comment during the hearings in response to matters raised.

4. Taking into account the creation of Class E, are the modifications proposed by the Council to Policy LPD10 sound?

CPRE has no comments at this time but reserves the right to comment during the hearings in response to matters raised.

Issue 3: Environment and Resources Policies

Policies LPC06, LPC07, LPC08, LPC09, LPC10, LPC11, LPC12 and LPC13 deal with a range of environmental policies. Section 4 of Policy LPC13 is dealt with under Matter 7. In response to preliminary questions, the Council proposes modifications to:

- Policy LPC06 (Biodiversity and Geological Conservation) and its explanation.
- Policy LPC07, the Site Profile for Site 4HA, Policy LPA05.1 and the Policies Map in relation to Greenways.
- The reasoned justification to Policy LPC09 (paragraph 7.15.1) to delete reference to ‘valued landscapes’ as none are identified within St Helens Borough.
- Section 6 of Policy LPC10 (Trees and Woodlands).
- Policy LPC11 (Historic Environment) so that it is consistent with, but does not repeat, national policy in Section 16 of the Framework.
- Policy LPC12 (Flood Risk and Water Management) so that it is consistent with, but does not repeat, national policy in Section 14 of the Framework.
- The reasoned justification to Policy LPC13 to delete reference to specific proposals for wind energy development (paragraph 7.27.5).

5. Having regard to the proposed modifications, are Policies LPC06, LPC07, LPC08, LPC09, LPC10, LPC11, LPC12 and LPC13 positively prepared, clear to the decision maker and consistent with national policy?

CPRE has no comments at this time but reserves the right to comment during the hearings in response to matters raised.

6. Whilst the achievement of net gains for biodiversity and enhancement of the natural environment is desirable, will a simple 2 for 1 replacement of any trees lost within Section 6 of Policy LPC10 be necessarily the most appropriate way of achieving gains and is it justified by any evidence (see Council's response to preliminary questions)?

CPRE has no comments at this time but reserves the right to comment during the hearings in response to matters raised.

Issue 4: Development Management Policies

Policies LPD01, LPD02, LPD04, LPD05, LPD06, LPD07, LPD08 and LPD09 deal with a range of development management policies. In response to preliminary questions, the Council proposes modifications to:

- Section 1 of Policy LPD01 (Ensuring Quality Development).
- Criteria 6 and 7 of Policy LPD02 (Design and Layout of New Housing).
- Sections 2 and 4 of Policy LPD04 (Householder Developments).

7. Having regard to the proposed modifications, are Policies LPD01, LPD02, LPD04, LPD05, LPD06, LPD07, LPD08 and LPD09 positively prepared, clear to the decision maker and consistent with national policy?

CPRE has no comments at this time but reserves the right to comment during the hearings in response to matters raised.

8. Are the requirements for developments to make provision for digital communication networks and make contributions to off-site broadband infrastructure within Policy LPD07 justified and consistent with national policy having regard to paragraph 112 of the Framework and the scope of the Building Regulations?

CPRE has no comments at this time but reserves the right to comment during the hearings in response to matters raised.