

Matter 7: Specific Housing Needs and Standards

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?

Part 1 of this policy looks for new market and affordable homes to include a range of types, tenures and sizes of homes as informed by relevant evidence including the SHMA. The SHMA¹ suggests the following mix of market housing: 1-bed properties 0-5%; 2-bed properties 25-30%; 3-bed properties 50-55% and 4-bed properties 15-20%. The policy is not entirely clear how this will apply in terms of the size of the site and the range that needs to be provided on each site. It is not entirely clear if each site should be seeking to provide for all needs, or whether the site should be seeking to address the mix in the area.

The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence.

The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; is appropriate for the local market and provides an appropriate mix for the location.

It is also noted how frequently the Viability Assessment 2019 highlights the implications of the SHMA housing mix on the viability of development.

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

The HBF considers that it can be appropriate to refer to the 'latest SHMA' as one element of the evidence that may be relevant to the development of a site. However, it would not be considered appropriate for this to be the only evidence, the SHMA only ever provides a snapshot in time and can become quickly dated, the HBF considers it is important to consider other factors that can also influence what may be an appropriate mix for a site.

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)?

The HBF considers that the 5% requirement for bungalows on sites of 25 dwellings or more is not justified. The SHMA² is clear that it is difficult to quantify a need / demand for

¹ Paragraph 7.35 of the SHMA Update 2019

² Paragraph 7.37 of the SHMA Update 2019

Home Builders Federation (HBF) response to the
St Helens Local Plan Examination
Inspector's Matters, Issues and Questions

bungalows as Census data does not identify this type of accommodation, therefore, the SHMA does not include any quantitative data on this type of housing or the demand. Furthermore, the policy applies to all greenfield sites without differentiation in terms of location, the topography, the character of the area or reference to the densities set out within Policy LPA05. The provision of bungalows may also impact upon viability. Given these issues, if a need can be demonstrated, it is recommended that the mandatory requirement be amended to a supportive policy stance which encourages rather than requires the provision of bungalows.

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

The NPPF³ provides a definition of older people for planning purposes which recognises the range of needs and potential types of homes that may be required. The PPG⁴ states that for plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people. The PPG⁵ goes on to suggest that plans should set clear policies to address the housing needs of older people, and that these policies should set out how the Council will consider proposals for different types of housing that older people are likely to require.

Part 2 of this policy states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG⁶. The HBF has concerns in relation to the requirements of this policy and the evidence to support it, these are set out in more detail in response to question 7 below.

Part 3 of the policy also looks for greenfield sites of 25 or more dwellings to provide 5% of the dwellings as bungalows. The HBF concerns in relation to this part of the policy are set out in response to question 3 above.

Part 5 of the policy states that the Council will work with partners to facilitate the provision of specialist and supported housing for elderly and vulnerable people. It goes on to suggest that provision of sheltered housing, extra care housing, retirement accommodation and residential care homes should be easily accessible by walking and public transport to a suitable range of services. The policy does not provide any allocations for these uses or any additional support to promote their delivery.

³ Glossary of the NPPF

⁴ PPG ID: 63-003-20190626

⁵ PPG ID: 63-006-20190626

⁶ PPG ID: 56-007-20150327

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

The HBF does not wish to answer this question, at this time.

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)?

The HBF considers that this could feed into the information and evidence considered in relation to the housing mix to be provided on site.

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?

Part 2 of this policy states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG⁷. It identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for St Helens which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. The SHMA Update January 2019 does provide some limited evidence in relation to the likely future need for housing for older people and disabled people it provides limited information in relation to the size, location, type or quality of dwellings needs and no evidence in relation to the accessibility and adaptability of the existing housing. The HBF does not consider that the evidence provided is sufficient to justify the requirements set. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.

The PPG⁸ also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

⁷ PPG ID: 56-007-20150327

⁸ PPG ID: 56-008-20160519

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

The HBF considers that if there is not sufficient local evidence to support the inclusion of the Nationally Described Space Standard (NDSS) that it should not be included in the Plan. It is noted that in response to PQ61 that the Council suggest that they do not consider they have the evidence.

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

The HBF considers that it would be beneficial to include a transitional period before the introduction of the optional standards as this will allow any new policies to be taken into consideration at the earliest stages of site purchase and development.

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 HBF notes that today's new homes are already very energy efficient with lower heating bills for residents in comparison to older existing homes. Energy performance data has shown that 8 out of 10 new build dwellings have an A or B energy efficiency rating, compared to only 3% of existing properties. An HBF report published in November 2019 found that, as a result, the average new build buyer in England and Wales saves £442.32 every year on heating costs compared to owners of existing dwellings.

The HBF recognises the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The Government Response to The Future Homes Standard Consultation and the Consultation on the Future Homes Standard consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated set out how the Government intends to address this issue. The interim uplift proposed in the Building Regulations will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. The Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements.

The HBF supports the Government's approach to the Future Homes Standard but currently there are difficulties and risks to housing delivery given the immaturity of the supply chain for the production and installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government proposals for the installation of EVCPs in new homes. In autumn 2020, the HBF established a Future Homes Task Force to develop workable solutions for the delivery of the home building industry's contribution to meeting national environmental targets and objectives on Net Zero. Early collaborative work is focussed on tackling the challenges of implementing the changes to Building Regulations successfully and as cost-effectively as possible, in particular providing information, advice and support for SME developers and putting the customer at the centre of our thinking.

Home Builders Federation (HBF) response to the
St Helens Local Plan Examination
Inspector's Matters, Issues and Questions

The HBF acknowledges that for the moment in its Response to the Future Homes Standard consultation, the Government has confirmed that the Planning and Energy Act 2008 will not be amended, therefore the Council will retain powers to set local energy efficiency standards for new homes. However, the Government has also acknowledged the need to clarify the role of Local Planning Authorities (LPAs) in setting energy efficiency requirements for new homes that go beyond the mandatory standards set out in the Building Regulations. The Housing, Communities & Local Government Committee have opened a new inquiry into Local Government and the path to net zero. The aim of the inquiry is to scrutinise the Government's plans to make all new homes "zero carbon ready" by 2025, through the introduction of the Future Homes Standard, and to explore how Local Government can help the UK to reduce its carbon emissions to "net zero" by 2050. One of the terms of reference was to consider what role LPAs play in determining local energy efficiency standards⁹. Government's Planning for the Future White Paper also set out that a simpler planning process improves certainty.

The HBF considers that the Council should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council should not need to set local energy efficiency standards in order to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes proposed in Building Regulations and the Future Homes Standard 2025.

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 2015?

The HBF does not wish to answer this question, at this time.

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?

This policy requires housing developments of 11 or more dwellings to provide at least 30% affordable homes where there are on greenfield sites within affordable housing zones 2 and 3, and 10% affordable homes where they are on brownfield sites in affordable housing zone 3.

The HBF does not dispute the need for affordable housing within St Helens and indeed supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take

⁹ Deadline for submissions was 30th April 2021

Home Builders Federation (HBF) response to the
St Helens Local Plan Examination
Inspector's Matters, Issues and Questions

account of need but also viability. The NPPF¹⁰ established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened. The Council will need to confirm that this policy is viable, through its evidence.

It is noted within the Viability Assessment 2019 that there are issues with the viability, therefore it is considered that a zonal approach may be appropriate in order to allow for affordable housing provision in areas where there is better viability. The Assessment appears to support the 0% provision of affordable housing in Zone 1 and it goes on to highlight that even without affordable housing the brownfield sites are not viable. For Zone 2 the Assessment shows that even on greenfield sites within Zone 2 at 30dph the affordable housing requirement is not viable and is only marginally improved at 35dph. The Council will also need to consider the implications of the 30% affordable housing requirement alongside the cumulative impacts and requirements of the policies within the Plan.

13. In particular:

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

The HBF is concerned that the evidence provided by the Viability Assessment 2019 does not support the requirement for 30% affordable homes on greenfield sites in Zone 2. The Assessment shows that even on greenfield sites within Zone 2 at 30dph the affordable housing requirement is not viable and is only marginally improved at 35dph. It is noted that one site remains unviable at 35dph, with the others having very narrow margins of viability and when consideration is given to not only the 30% affordable housing requirement but also to the cumulative impacts of the policies within the Plan the situation is worse.

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

The HBF does not wish to answer this question, at this time.

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

The HBF does not wish to answer this question, at this time.

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

The HBF does not wish to answer this question, at this time.

¹⁰ Paragraph 34 of the NPPF

Home Builders Federation (HBF) response to the
St Helens Local Plan Examination
Inspector's Matters, Issues and Questions