

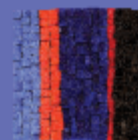
St. Helens Local Plan Examination

**Response to Inspector's Matters, Issues
and Questions**

**Matter 7: Specific Housing Needs and
Standards**

Persimmon Homes North West (R01145)

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mosaic
town planning

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1 Introduction

- 1.1 These representations are submitted on behalf of Persimmon Homes North West, who have an interest in the site '**Land South of Billinge Road, Garswood (1HA)**'. The site is currently within the Green Belt and has a draft allocation for residential development.
- 1.2 Persimmon have historically been active within the St. Helens local authority area, as evidenced by their recently completed schemes on brownfield sites at Vulcan Park, Newton-le-Willows and Deacon Trading Estate, Earle Street, Earlestown, and continue to pursue new opportunities across the Borough.

2 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?

- 2.1 Persimmon Homes consider that the wording of Section 1 is appropriate.
- 2.2 The policy requires that the range of types, tenures and sizes should be informed by relevant evidence, including the SHMA. The accompanying explanation (6.3.4) indicates that the evidence should only be used to provide the minimum sizes required to meet the range of needs identified, and that Table 6.1 will ***“guide the assessment of planning applications”***. Therefore, the Council is not seeking to rigidly impose a mix and this is welcomed.
- 2.3 The SHMA itself provides some discussion of the difficulties in translating a net increase in the number of households to a suggested profile for additional housing to be provided. Of particular note is the comment referring to market sector households that ***“The size of housing which households occupy relates more to their wealth and age than the number of people they contain. For example, there is no reason why a single person cannot buy (or choose to live in) a four-bedroom home as long as they can afford it and hence projecting an increased in single person households does not automatically translate into a need for smaller units.”*** (parag. 7.8). Furthermore, it would also be inappropriate to apply a rigid mix to sites without regard to the size and physical characteristics of a site, the local housing market or indeed scheme viability.

- 2.4 The SHMA breakdown is more directly applicable to the mix of affordable housing, which providers will need to match more closely to the needs of the occupier. However, this must still take account of the balance existing stock in the sub-area and the nature of those on the waiting list.
- 2.5 Overall, the Council's approach is justified in that it will involve the application of proportionate and up to date evidence and consideration of each planning application on its merits. It will be effective because it will allow each application to be judged as the position evolves over the plan period.

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

- 2.6 Explanatory text supporting Policy LPC01 refers to the SHMA Update 2018, whereas the latest version is dated January 2019. The plan period is expected to run to 2037 and the current SHMA will become increasingly outdated. It is confirmed in paragraph 6.3.4 of the Local Plan that the range of sizes needed will be kept under review as the plan period progresses and that applications will be determined taking into account relevant evidence, including the most up-to date SHMA. This approach is positively prepared as it seeks to meet the area's housing needs and effective because it recognises that these will change over the plan period. Should the SHMA not be updated as often as may be desirable, it is explicit that other evidence can be taken into account.

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)?

- 2.7 The Council's answer at PQ60 does not fully reflect the evidence from the SHMA, which also comments that:
- There is also the possibility of a need/demand for retirement accommodation more widely. Retirement apartments can prove very popular if they are well located in terms of access to facilities and services, and environmentally attractive (parag. 7.39)
 - The downside to providing bungalows is that they are relatively land intensive for the amount of floorspace created (parag. 7.40)
- 2.8 Whilst there is a requirement for properties with level access, it does not follow that this should be translated into bungalows on greenfield sites. Firstly, ground floor apartments on such general market housing sites can also provide this. Secondly, shared ownership retirement apartments (as opposed to a social or affordable rent tenure) can be attractive to homeowners who wish to downsize, and are more likely to be accessible by walking and public transport to services in accordance with Policy LPC01. 5). Provision of such purpose-built specialist accommodation, which does involve highly

efficient use of land, is a more effective approach. Therefore, the requirement for 5% bungalows is not fully justified.

- 2.9 Planning applications for residential development should be considered against policies in the Development Plan in the round; the policy requirement for bungalows - which the SHMA acknowledges as land intensive – being balanced against Policy LPA05(3) which requires new development to optimise the amount of housing developed on a site and sets minimum density requirements, as well as national policy to make the most efficient use of land.

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

- 2.10 Part 5 of the Policy confirms the Council’s intention to facilitate the provision of specialist and supported housing for the elderly and provides locational criteria. This is in addition to the overall requirement under Part 1 which will require planning applications to address local housing need informed by relevant evidence. Whilst provision is made in general terms, the Plan does not appear to identify specific opportunities for provision of specialist housing which would be a more effective approach than relying upon sites aimed at satisfying general housing needs.

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

- 2.11 The evidence referred to in SD025 (parag. 3.75) indicates a relatively low interest in self-build properties with 12 applicants on the register. Given the Council’s assumption of 93 completions from small sites per annum, it would seem reasonable to expect sufficient capacity from this source to meet demand. Persimmon Homes would not support any requirement for developers of larger schemes to designate self-build plots (paragraph 3.75 of SD025). Locating such plots within a suburban housing estate by a volume housebuilder appears contrary to the spirit of self-build and the Council has observed that in St Helens all applicants would prefer an individual self-build or custom housebuilding plot.

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)?

- 2.12 Given that the Policy does make specific reference to bungalows and a relative shortfall of detached houses has been identified in paragraph 2.5.1, it would be preferable in the interests of consistency to make reference to both as part of a balanced mix of housing. In both cases a uniform target is not

appropriate, due to the need to consider the characteristics of the specific site and the local housing market.

3 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?

- 3.1 Persimmon Homes agree that it is appropriate for planning policies to reflect the type of housing required by older people and people with disabilities in accordance with paragraph 61 of the Framework. The application of optional accessibility, adaptability and wheelchair standards may be an appropriate means of contributing to this, where the criteria contained within Planning Practice Guidance are satisfied (ID: 56-007-20150327).
- 3.2 As identified in the SHMA, the ageing population and higher levels of disability and health problems amongst older people suggest that there is likely to be an increased numerical requirement for specialist housing options. However, it is also necessary to consider the size, location, type and quality of dwellings needed to meet specifically evidenced needs, with reference being made in the Guidance to retirement homes, sheltered homes or care homes. It is also necessary to assess the accessibility and adaptability of the existing housing stock, along with how these needs vary across tenures. However, these matters are not assessed in Chapter 6 of the SHMA.
- 3.3 Therefore, the link between the ageing of the population and the selection of the policy criteria for application to larger greenfield sites in Policy LPC01 is not apparent. On this basis, the policy has not been justified. In addition, the policy adopts a blanket approach, which does not refer to the need to consider site-specific considerations such as drainage and topography in applying the standards.

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

- 3.4 In the absence of any relevant data from the Council, use of the NDSS cannot be justified and a plan incorporating it would therefore not be 'sound'. In addition, the viability assessment of plan policies could not be relied upon with the introduction of an additional requirement which would impose development costs but is not accounted for.

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

- 3.5 A transitional period would be appropriate to reflect the fact that decisions will have been taken relating to site values and mix on sites within the development pipeline prior to the adoption of the policy, so that an unduly onerous requirement would be placed upon developers at a late stage in the absence of this.

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?

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?

Energy performance standard equivalent to former CSH level 4

- 3.6 Persimmon Homes are a member of the Home Builders Federation (HBF) who are making a detailed response in relation to energy policy and endorse the HBF response.

4 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?

- 4.1 In order for the Local Plan to be sound, it must be justified. Planning Practice Guidance advises how policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision-making stage.
- 4.2 The zonal approach to affordable provision within Policy LPC02 is justified by the Economic Viability Assessment (VIA001). The position is the clearest cut for brownfield sites in Zone 1, in which 27 out of 28 development size/density combinations were found to be unviable even without affordable housing. Whilst a higher proportion of combinations on greenfield sites could potentially be viable,

the surplus which is forecast is often marginal even without affordable housing or other developer contributions and policy requirements. Therefore, there is no scope to impose an affordable housing requirement. This would either deter developers entirely, so that brownfield sites would not come forward which would be contrary to the strategic objectives of the plan, or lead to unwarranted viability assessments with individual planning applications.

- 4.3 Similarly, within Zone 2 Tables 6.7 to 6.9 shows that only large brownfield sites or those of at least 40 dwellings per hectare would be viable even without affordable housing. The analysis therefore concludes that new housing developments on brownfield sites in Zone 2 locations are unlikely to be able to support affordable housing provision.
- 4.4 With regard to brownfield and greenfield sites in Zone 1 and brownfield sites in Zone 2, it is important to bear in mind that the policy is only applicable to new open market housing developments of 11 units or more. It does not mean that affordable housing will not be provided, as much of the housing in this area will be developed by registered providers of social housing which the Council will support in accordance with part 1 of the policy. For example, Mosaic Town Planning is currently agent for a 100% affordable scheme on a brownfield site in Sutton (Zone 2) which will deliver 81 dwellings for Progress Housing Group.

13. In particular:

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

- 4.5 Based on Table 6.10 of the Economic Viability Assessment, 30% affordable provision would be marginally unviable on greenfield sites in Zone 2 if development takes place at the minimum density of 30dph, but it would generally be viable at 35dph. It is an undesirable starting point if a development density which would comply with policy would not be viable, even without other developer contributions. This is of particular relevance to those sites to which the lower minimum density applies in Table 4.5 of the Submission Local Plan. Persimmon Homes envisage a net density of 37dph for Allocation 1HA, compared with the 30dph applied in Table 4.5, and it is apparent that the Council may need to accept higher densities if affordable targets are to be satisfied.

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

- 4.6 The evidence justifies a distinction as only brownfield sites of a relatively large size or high density would be viable, even with no affordable contribution, in Zone 2 (Tables 6.7 to 6.9), whilst table 6.12 and 6.13 show that 10% affordable housing would be achievable in 13 out of 14 scenarios in Zone 3.

The policy requirement is clear from a combination of the wording of Policy LPC02 and the accompanying Table 6.3 and map at Figure 6.1.

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

- 4.7 Whilst the wording provides sufficient flexibility on the face of it, it would be unfortunate if there is a need to provide an independent viability assessment on a greenfield site of a policy compliant 30dph when the evidence base already indicates that this could not provide 30% affordable housing.