



## **ST HELENS BOROUGH LOCAL PLAN 2020-2035 EXAMINATION**

### **MATTER 7 – SPECIFIC HOUSING NEEDS AND STANDARDS**

### **ON BEHALF OF REDROW HOMES NORTH WEST**

Date: May 2021

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## **Pegasus Group**

Queens House | Queen Street | Manchester | M2 5HT

**T** 0161 393 3399 | **W** [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

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**1. INTRODUCTION**

- 1.1 Pegasus Group has been instructed on behalf of their client, Redrow Homes North West, to prepare Hearing Statements to the St Helens Local Plan Examination (EiP) in support of their land interests in the Borough. This comprises land to the south of Burrows Lane, Eccleston, which is currently an omission site (i.e. is not allocated for development) in the emerging St Helens Local Plan.
- 1.2 This Statement deals with Hearing **Session 9 Matter 7 'Specific Housing Needs and Standards'**.

## **2. ISSUE 1: HOUSING MIX**

### **Question 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 Part 1 of the policy states that new market and affordable housing must address local housing need and include a range of types, tenures and sizes informed by relevant evidence including the SHMA.
- 2.2 Redrow are fully aware of the need for a mix of house type, sizes and tenures to be delivered on housing sites to meet local needs. This is best met by determination of the market at the time of submission of a planning application, rather than at the point of adoption of the local plan. Redrow are supportive of the fact that this policy does not contain overly prescriptive housing mix standards, which can often lead to deliverability and viability issues. Indeed, Redrow would object to the introduction of a prescriptive housing mix policy. We echo the sentiment of the HBF, who recommend a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site. A flexible approach will also help to ensure that housing schemes are viable and appropriate for the local market, i.e. housing mix is a matter which should be considered on a site-by-site basis. We also highlight (as the HBF have) how frequently the 2019 Viability Assessment highlights the implications of the SHMA housing mix on the viability of development.

### **Question 2 - Does the reference to the 'latest SHMA' in Policy LPC01 result in a positively prepared and effective policy?**

- 2.3 It is appropriate for the policy to refer to the latest SHMA as an important element of the evidence base for setting detailed housing policies. However, this is not the only relevant evidence, as the SHMA only ever provides a snapshot in time and can become quickly dated. It is therefore important to consider other factors, such as market conditions, that influence the appropriate housing mix for a site as part of a more holistic approach, to avoid too much emphasis being put on the SHMA.

### **Question 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)?**

- 2.4 No, the 5% requirement for bungalows on larger greenfield sites (25 dwellings or more) is not justified and should be removed.
- 2.5 At paragraphs 7.37-740 of the 2019 SHMA (**HOU001**), it is noted that it is difficult to quantify a need / demand for bungalows as Census data does not identify this type of accommodation. The SHMA does not include any quantitative data on this type of housing or the demand. Therefore, there is no justification for the 5% requirement.
- 2.6 It is also notable that the policy applies to all greenfield sites without differentiation in terms of location, 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 the larger plot sizes, reduction in density and total scheme coverage (sq.ft.) and also lead to deliverability concerns should there be

a requirement to provide bungalows on site where it is simply not suitable. Furthermore, whilst the Viability Assessment does test 5% bungalow provision, it is based on an assumption that they will all be 2 bed in nature and there are already viability concerns across certain areas of St Helens. A requirement for 5% bungalow provision will only exacerbate this viability issue.

- 2.7 In light of these issues, a need case must be clearly demonstrated in order to justify the 5% requirement. On the basis of the information provided to date, this requirement is not justified and should be removed from the Plan.

**Question 4 - Does Policy LPC01 make sufficient provision for the housing needs of older people?**

- 2.8 Paragraph 69 of the NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including the needs of older people.

- 2.9 Whilst Redrow fully acknowledge the growing need for elderly housing in light of demographic changes, we do have concerns with some elements of this policy. 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. Redrow has concerns in relation to the requirements of this policy and the evidence/justification to support it, which we set out in more detail in response to question 7 below.

- 2.10 We have already outlined our concerns in relation of part 3 of the policy (bungalows) as set out in response to question 3 above.

- 2.11 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. It is notable that policy and Plan falls short of providing any allocations for these uses or any additional support to promote their delivery. Specific allocations for elderly housing would be the most appropriate and suitable way to meet elderly needs. The policy should also provide additional information as to how the Council will promote the delivery of extra care/sheltered accommodation to meet these identified needs.

- 2.12 The onus should not just be placed on development sites to provide an element of elderly housing, as there may be circumstances where this simply is not suitable or viable.

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

- 2.13 No comments on this matter, albeit we reserve the right to comment on this matter in the future should this policy change.

**Question 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)?**

- 2.14 We do not consider this needs to be explicitly referenced in the policy, as this could be overly prescriptive, as per our previously noted concerns in relation to prescriptive housing mix standards. Instead, we recommend that the policy is re-worded to acknowledge that the Plan will be supportive of sites that rebalance the housing stock in the Borough, including through the provision of detached homes.
- 2.15 Redrow, as a prolific housebuilder of detached housing stock, are well placed to meet these needs at the omission site at Burrows Lane, Eccleston.

### **3. ISSUE 2: HOUSING STANDARDS/SUSTAINABLE DESIGN**

**Question 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 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.
- 3.2 Whilst Redrow acknowledge the growing importance to cater for the needs of the elderly and disabled people, it is important to note that these are optional technical standards which must be fully justified by the Council. Indeed, the PPG<sup>1</sup> outlines clear guidance as to what evidence needs to be considered 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.
- 3.3 The Council has not provided sufficient evidence to justify the inclusion of optional higher standards for accessible and adaptable homes in the Local Plan. Whilst the SHMA Update January 2019 provides some limited evidence in relation to the likely future need for housing for older people and disabled people, it fails to comprehensively discuss the size, location, type or quality of dwellings needs and provides no evidence in relation to the accessibility and adaptability of the existing housing. Until the Council can provide further evidence to justify the introduction of the optional technical standards, reference to them should be removed from the policy. We believe that this is un-evidenced and such a requirement should be deleted from the plan in order for the policy to be considered sound.
- 3.4 The PPG<sup>2</sup> also identifies other requirements that need to be considered when introducing such a policy, including site-specific factors such as vulnerability to flooding, site topography and other circumstances. Furthermore, 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.

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

- 3.5 No, as noted in the Council's response to PQ61, they do not consider they have the necessary evidence to introduce the Nationally Described Space Standard (NDSS). Accordingly, the Plan should continue to omit reference to the NDSS, as there is no evidence to support its inclusion.

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<sup>1</sup> PPG ID: 56-007-20150327

<sup>2</sup> PPG ID: 56-008-20160519

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

- 3.6 There is insufficient justification to introduce the optional standards, therefore no transitional period should be required.

**Question 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?**

- 3.7 Redrow fully recognise the need to move towards greater energy efficiency, which is best achieved via a nationally consistent set of standards and timetable. The Government are proposing changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings, which set out how the Government intends to address energy efficiency issues in a coordinated and consistent manner. The interim uplift proposed in the Building Regulations will deliver homes that are expected to produce 31% less CO<sup>2</sup> emissions compared to current standards. The Future Homes Standard will ensure that new homes will produce at least 75% lower CO<sup>2</sup> emissions than one built to current energy efficiency requirements.
- 3.8 It is our strong view that the Council should align with the Government's intention of setting such standards nationally through changes to the Building Regulations, rather than taking a more localised approach in this plan. This gives the development industry a standardised tool to follow and greater certainty within the sector as a whole in terms of what is required across the board. Moreover, the Council shouldn't 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.
- 3.9 Therefore, the 10% requirement is not justified and should be removed from the Plan. This matter will be comprehensively addressed as part of the proposed changes to the Building Regulations.

**Question 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**

- 3.10 No comment.



#### **4. ISSUE 3: AFFORDABLE HOUSING**

##### **Question 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 Redrow support the need to deliver affordable housing and fully recognise their obligations as a responsible housebuilder to assist in meeting such needs.
- 4.2 Redrow also support the notion of applying different affordable housing ratios to different parts of the Borough based on an understanding of needs and viability, as this accords with paragraph 34 of the 2019 NPPF which confirms that policies relating to planning contributions should not undermine the deliverability of plans.
- 4.3 This policy requires housing developments of 11 or more dwellings to provide at least 30% affordable 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.
- 4.4 It is noted within the Viability Assessment 2018 that there are issues with 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. That said, turning to the zones themselves, the Viability Assessment highlights some issues with the proposed requirements, with 30% affordable on greenfield sites within Zone 2 not considered viable at 30 dph and only marginally improved at 35 dph. One site remains unviable at 35 dph, with the others having very narrow margins of viability. Furthermore, when the cumulative impacts of the other policies within the Plan, on top of the 30% affordable requirement, the situation gets worse. The Council therefore must provide further evidence which considers the cumulative impacts of the affordable housing policy alongside other policy requirements on viability matters.
- 4.5 The Viability Assessment appears to support the 0% provision of affordable housing in Zone 1 and goes on to highlight that even without affordable housing, the brownfield sites are not viable. It is notable that several brownfield sites are set to come forward within Zone 1, including two strategic allocations. Site 6HA is set to provide 0% housing provision on a permitted scheme of up to 1,100 dwellings and the first phase of the 10HA allocation, comprising 258 dwellings and pending determination, is also set to deliver 0% affordable housing. So, affordable housing provision is being missed out on two key strategic sites of the Plan. This raises concerns as to whether the affordable housing needs of St Helens will be met, and also deliverability concerns, given the emphasis on brownfield development. Fundamentally, the plan is failing to meet affordable housing needs and we respectfully consider that additional greenfield sites within zone 3 should be allocated within the Local Plan to help deliver affordable housing needs in the areas where it is most viable to do so (as set out within our Regulation 19 representations and Matter 3 and 4 statements).

**Question 13 - In particular:**

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

- 4.6 We echo the HBF's concerns that the evidence provided by the Viability Assessment 2019 does not support the requirement for 30% affordable homes on greenfield sites in Zone 2. As noted in question 12, 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.
- 4.7 More evidence must be provided by the Council on viability matters. As it currently stands, Policy LPC02 is not justified.

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

- 4.8 Supporting Table 6.3 makes the differences in affordable housing requirements clear.

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

- 4.9 Yes, part 4 of the policy provides sufficient flexibility.

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

- 4.10 No comment.

**5. 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).*

**Questions 16-20**

5.1 No comments.