

# St Helens Local Plan 2020-2035 Examination in Public

## Hearing Statement on behalf of Story Homes

### Matter 7 – Specific Housing Needs and Standards

May 2021

Relevant Site:

Land south of A580 between Houghtons Lane and Crantock Grove, Windle (Ref: 8HS)

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## 1 Introduction

- 1.1 This statement has been prepared by Hive Land & Planning on behalf of Story Homes and responds to the Matters, Issues and Questions released by the Inspectors on 30<sup>th</sup> March 2021. In this submission Story Homes are responding to **Matter 7, Issues 1, 2 and 3.**
- 1.2 The involvement of Story Homes in the St Helens Local Plan Examination relates to the continued promotion of the Land south of A580 between Houghtons Lane and Crantock Grove, Windle, Ref 8HS (hereafter referred to as 'Site 8HS'). Story Homes has promoted Site 8HS for the residential development of around 1,100 dwellings and has been undertaken following an agreement with the landowners.
- 1.3 Site 8HS is currently located within the Green Belt and has been identified as a Safeguarded Site within the Submission Draft St Helens Local Plan 2020 -2035, to be reserved for future residential development until after the plan period, unless a subsequent Local Plan Review proposes to allocate the land for development. In safeguarding Site 8HS, the Council has recognised that Site 8HS represents a suitable and sustainable location for housing and Story Homes welcome and support this recognition.
- 1.4 In the 2016 Preferred Options Draft of the Local Plan however, Site 8HS was identified as a Housing Allocation to come forward within the current Plan Period. This further confirms the Council's acceptance that Site 8HS, as a matter of principle, is a suitable location in which to locate this scale of new housing.
- 1.5 The Council has therefore acknowledged the acceptability of Site 8HS for residential development at every stage of the plan-making process.
- 1.6 This Hearing Statement should be read in conjunction with all the statements being submitted by Story Homes in response to **Matters 1, 2, 3, 4, 5, 10 and 11.**
- 1.7 We trust that this Statement assists the Inspectors in respect of the Examination.

## 2 Matter 7: Specific Housing Needs and Standards

### 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 Section 1 of draft Policy LPC01 is a short statement which refers to the need for new and affordable housing to address local need and include a range of types, tenures and sizes. The mix should then be informed by relevant evidence including the latest Strategic Housing and Market Assessment (SHMA), 2018.
- 2.2 Story Homes view is that Section 1 of Policy LPC01 is a high level, broad statement, which correctly is not overly prescriptive in terms of the quantum of different house types and sizes that should be delivered over the plan period. The policy is considered to be positively prepared and justified, as it refers to a key evidence base document, in this case the 'latest SHMA'. Specific housing needs will evolve over time and the appropriate housing mix will also be determined on a site by site basis, based upon the most up to date assessment of housing needs.
- 2.3 The key to the successful operation of this policy is through the identification of an appropriate range of sites that collectively can deliver the housing mix/needs currently identified within the current SHMA.

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

- 2.4 Please see the response to Question 1.

*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)?*

- 2.5 As the Inspectors state in PQ60, the SHMA Update (HOU001) indicates that it is difficult to quantify the need/ demand for bungalows. As set out in their response to PQ60, the Council provides additional commentary supporting their draft policy, which can be summarised as:

- a. St Helens already has, and is forecasted to continue to have, a high proportion of over 65 years + within its population;
- b. RSL & Council housing waiting lists confirm demand;
- c. Local Plan Economic Viability Assessment (2018) (VIA001) found policy to be viable;
- d. Support from local residents during consultation.

- 2.6 The SHMA Update (HOU001) states that the Council should “consider the potential role” of bungalows as part of the future mix of housing but does not recommend that the Council requires the provision of bungalows as part of their housing mix, nor does it recommend a percentage to be included within the housing mix. HOU001 also highlights that bungalows are “relatively land intensive” for the amount of floorspace created.
- 2.7 The Council's approach to Paragraph 1 of draft policy LPC01 (Housing Mix) is very much focussed on the need for proposals to address local housing needs identified with the latest SHMA. The proposed 5% bungalow requirement therefore deviates from the Council's 'up to date' SHMA evidence-based approach. We also seek conformation from the Council that this is not a mutually exclusive requirement over and above the requirements set out in Section 2 of the policy that require 20% of properties to Part M4(2) and 5% to Part M4(3), as the two requirements will clearly overlap.
- 2.8 It is acknowledged that the Council provides further justification for the requirement in its response to PQ60. For example, the Council's first point of justification is the high proportion of elderly people within St Helens. However, bungalows are not the only type of accommodation that could be made available to elderly people within the Borough. The retirement living / extra care sector provides for the needs of elderly people by providing levels of care appropriate for the individual and also provide the opportunity for social interaction, which assists with well-being.
- 2.9 The Council's second justification is that the Registered Social Landlords (RSL) & Council Housing waiting lists confirm the demand for bungalows, stating that RSL Torus have 789 applicants on their list who need a “ground floor property”. The Council does not provide any quantitative evidence of their own housing waiting lists. In addition, the Council does not provide any evidence of the demand by sharing data over a

number of recent years to calculate an average demand. It is therefore not clear how the Council arrived at the 5% requirement based on the demand. It is also important to note again that bungalows are unlikely to be the only type of ground floor accommodation suitable for those on Torus' waiting list; ground floor apartments for example could also fulfil this need.

- 2.10 The fact that the high level viability assessment does not consider the policy unviable is also not evidence or justification for its inclusion. In addition, the Inspectors correctly point out that bungalows do not make the most effective use of land, which is due to the plot sizes required per bungalow (as the SHMA Update also highlights).
- 2.11 Therefore, Story Homes do not consider that the evidence is proportionate and so this element of the draft policy is not justified, failing the test of soundness in the NPPF. In order to make the policy sound, Story Homes consider that the Council should “encourage” developers to provide a proportion of bungalows on greenfield sites rather than this being a requirement, which will likely result in a viability assessment for a site to be an exception to the policy. A detailed viability assessment at the decision making stage can cause long delays and incur additional costs for both the Council and developer, which should be avoided. As confirmed above, alternative scenarios are also available to meet this specific housing requirement which is capable of being addressed through the provision of ground floor apartments.
- 2.12 Notwithstanding the comments above, Story Homes regularly include bungalows within their housing mix at their developments and would positively consider the feasibility of including 5% bungalows within the proposed housing mix for Site 8HS if allocated or safeguarded as proposed. Story Homes are therefore highly supportive of the principle to meet the needs of elderly people within the Borough, subject to the comments above being taken into account.

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

- 2.13 Story Homes is supportive of the Council in principle seeking to meet the housing needs of elderly people. Story Homes refers the Inspector to the response to Question 3 of this Matter, with regards to whether the policy requiring greenfield sites to provide 5% of the housing mix as bungalows is a sound approach, noting again that bungalows are not the only type of accommodation available to elderly people within the Borough. The retirement living / extra care sector provide for the needs of elderly people by providing

levels of care appropriate for the individual and also provide the opportunity for social interaction, which assists with well-being.

- 2.14 In developing the mix of Site 8HS Story Homes would appreciate early conversations with the Council about what provision on site would best meet the needs of the elderly population. As mentioned, Story Homes regularly deliver bungalows for open market sale and are also open to the idea of working jointly with a registered care provider to deliver an element of 'extra care' provision on Site 8HS. All of which will contribute to a diverse, mix of types and tenures on site. Story Homes have a successful track record in this regard, with a good example being the partnership with Sue Ryder to deliver a state-of-the-art care facility at their D'Urton Manor development in Preston.

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

- 2.15 Story Homes consider that Policy LPC01 does make sufficient provision for the housing needs of those who wish to build their own homes. The policy is supportive of self-build and custom build dwellings in accordance with national policy. SD025 notes that as of October 2020, there were only 12 individuals on the Register. Therefore, the supportive policy wording is likely to allow sufficient windfall development to meet such needs.

*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)?*

- 2.16 Story Homes considers that the Council should amend draft policy LPC01 to reference a need for detached houses due to the evidence of low numbers of such homes within the Borough's current housing stock.
- 2.17 Paragraph 2.5.1 of the submitted Local Plan states that detached houses made up just 14% of the Borough's total housing stock in 2011, which was significantly lower than the regional and national averages (18% and 23% respectively). The SHMA Update, January 2019 (Ref: HOU0001) concludes that there is a significant need for 3 and 4+-bed market dwellings, comprising 50-55% and 15-20% of the appropriate market housing mix, respectively. The SHMA Update, 2019 also highlights the role that larger 4+ family homes have, stating that the '*delivery of larger properties can help to meet the needs of households in high priority and to manage the housing stock by releasing supply of smaller properties*.' (para 7.23).



- 2.18 Furthermore, as SHBC011 highlights, the future housing supply is heavily skewed towards the Town Centre and existing urban areas. This distribution of sites will not improve the low numbers of detached housing within the housing stock, as sites within urban areas generally cannot provide sufficient numbers of detached housing due to the often constrained nature of these sites. The density thresholds the Council are seeking to establish through Policy LPA05 (minimum of 40dph within and adjacent to St Helens/Earlestown town centres) further exacerbates this situation.
- 2.19 Site 8HS has the potential to address the growing need for new high quality and modern family homes in St Helens and will deliver a wide mix, type and tenure of new homes to meet the differing needs across the community. The scale of the Site, which offers the potential 1,100 dwellings is significant in the scope that it provides the opportunity for a truly diverse range of house types and neighbourhoods to be brought forward. The Site will provide attractive and well-built family homes as part of a sustainable and tranquil environment, integrated with new green and blue infrastructure. A high quality placemaking agenda will be pursued sitting appropriately alongside the lower density of development proposed, whilst also being mindful of the need to achieve an efficient use of land in respect of net densities

## 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?*

- 2.20 Story Homes consider the application of the optional technical standards in this case of Section 2 of Policy LPC01, are supported by proportionate evidence and are therefore justified. Section 2 of Policy LPC01 applies the optional standards set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that at least 20% and at least 5% of dwellings on a larger greenfield site must be designed to the “accessible and adaptable” and “wheelchair user” standards respectively.
- 2.21 Story Homes already have a range of house types which meet Parts M4(2) and M4(3) of the Building Regulations and would be willing to provide the requested proportion of both types of dwellings at Site 8HS. Story Homes are however of the view that the delivery of accessible and adaptable dwellings should not be limited to large greenfield sites. This policy requirement should not be excluded from housing schemes on inner urban sites, as they account for the majority of St Helens housing land supply, Large

greenfield sites should therefore not be expected to 'redress the balance' and Policy LPC01 should seek to achieve an even distribution of accessible and adaptable dwellings across the borough in order that this specific housing need is fulfilled.

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

- 2.22 As the Council's answer to PQ61 outlines, we agree there is a lack of sufficient local evidence to justify the use of the optional Nationally Described Space Standards (NDSS) within policy.
- 2.23 Nonetheless, Story Homes have a fully NDSS compliant range of house types already being delivered elsewhere and anticipate they will be able to deliver these as part of an overall mix to achieve an appropriate density across Site 8HS.

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

- 2.24 Planning Practice Guidance (PPG) advises:

*"There may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.<sup>1</sup>*

- 2.25 Therefore, Story Homes consider that to accord with PPG, the Council should include a reasonable transitional period to implement the optional technical standards. The inclusion of a transitional arrangement may reduce the likelihood of the Council and developers incurring costly delays due to the submission of a viability assessment, using the "exception" clause in Section 4 of Policy LPC01.
- 2.26 Notwithstanding the recommended modification above, Story Homes anticipate that should Site 8HS be allocated for development within the Plan period at least 20% of the homes would be constructed to M4(2) standards and at least 5% of dwellings to M4(3) standards, as required by the draft policy LPC01.

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<sup>1</sup> Housing Optional Technical Standards, Paragraph 20, Ref ID 56-020-20150327

*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?*

2.27 The National Planning Policy Framework (Paragraph 151) states that plans should:

*c) Identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.*

2.28 To this end, the proposed draft policy is justified and consistent with national policy. However, the policy should be modified to reference the Future Homes Standard 2025, or other subsequent legislation which may supersede the Council's requirements and ensure LPC13 remains consistent with national policy throughout the Plan period.

2.29 Story Homes would expect to be delivering 10% energy from renewable / low carbon heat sources at Site 8HS in line with the requirements of the 2025 Future Homes Standard. Story are already innovating in this area, for example PV panels being installed as standard and are actively exploring other means of delivering energy from 10% renewable sources.

*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?*

2.30 Section 4 of Policy LPC13 does not appear to accord with the Written Ministerial Statement of March 2015, which instructs local planning authorities that they should not set any additional technical standards/requirements relating to the construction, internal layout or performance of the new dwellings.

2.31 Notwithstanding that, Story Homes developments already meet Part L requirements and are very close to achieving the aims set out in the Part L update, and so are built to high standards of sustainable design and construction, minimising carbon emissions where possible.

2.32 As such Site 8HS would be built to the Policy as drafted and would be an exemplar example of a modern, sustainably built, future proofed housing development in line with the core Story values.

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<sup>2</sup> Energy performance standard equivalent to former CSH Level 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?*

- 2.33 The SHMA has objectively concluded that there is an annual requirement over the plan period for the delivery of 117 affordable dwellings per annum.
- 2.34 As Story Homes have raised earlier in this Statement and in other Statements to this Examination, the proposed distribution of housing land supply is disproportionately skewed towards St Helens town centre and inner urban sites, which rely on brownfield land coming forward (this represents approximately 60% of all housing land supply).
- 2.35 The spatial distribution of these sites will result in the majority of housing sites needing to deliver only 10% or 0% Affordable Housing. Therefore it is highly questionable as to whether Policy LPC02 as drafted, combined with the distribution of proposed supply, will deliver the 117 Affordable Houses per annum that St Helens requires over the plan period.
- 2.36 In contrast, Site 8HS, which is a greenfield Site located in Zone 2, will be able to make a significant contribution towards affordable housing, with the Policy LPC02 requirement of **30% affordable housing expected to be delivered**. The Site will therefore make a significant contribution towards meeting the Council's identified affordable housing need in the short, medium and longer term through the delivery of around 330 affordable homes, which is the equivalent of nearly 3 years' worth of St Helens identified affordable housing needs.

*Question 13. In particular:*

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

- 2.37 See answer to Question 12 above.

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

- 2.38 Story Homes have no comments in response to this part of the question.

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

2.39 Policy LPC02 allows exceptions to the provision of affordable housing with the justification of an independent site specific viability appraisal and where the benefits of proceeding with the development outweigh the failure to provide the full affordable housing contribution.

2.40 This approach seems sufficiently flexible to take in to account particular site circumstances.

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

2.41 Story Homes have no comments in response to this question.

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Matter 7 – Specific Housing Needs and Standards