



# Hearing Statement

In relation to: Matter 7 – Specific Housing Needs and Standards

for Wainhomes (North West) Ltd

Emery Planning project number: 17-005

Project : 17-005  
Hearing : Matter 7 – Specific  
Housing Needs and  
Standards  
Client : Wainhomes (North West)  
Ltd  
Date : 27 May 2021

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## 1. Introduction

1.1 Emery Planning is instructed by Wainhomes (North West) Ltd to attend the St Helens Borough Local Plan Examination. Wainhomes (North West) Ltd has an interest in the following sites:

- Land off Camp Road and Strong Road, Garswood;
- Land off Lords Fold, Rainford; and,
- Land off Winwick Road, Newton-le-Willows.

1.2 This hearing statement sets out our response to the Inspector's Matters, Issues and Questions in relation to Matter 7 – Specific Housing Needs and Standards. It should be read in conjunction with our Regulation 19 representations and our other hearing statements to the examination.

## 2. Response to Matters and Issues

### Issue 1: Housing Mix

#### **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 No. The mix set out within the 2018 SHMA is driven by the demographic makeup of new households. There is insufficient assessment of market demand. Many households choose to occupy houses with more bedrooms than technically required, for example older households who choose not to downsize and households requiring bedrooms to be used as guestrooms and home office- the demand for which has increased significantly during COVID-19 pandemic. By failing to adequately account for demand additional pressures will be placed upon the housing market. This must be reflected within the policy.

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

2.2 No. All development plan policies must be clear and transparent. The policy as worded is extremely ambiguous and is not clear what 'relevant evidence' is (other than the SHMA). Furthermore, the wording of the policy refers to the 'latest' SHMA, suggesting that that the policy requirement could in effect change over time, without being tested through the development plan process.

### **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)?**

2.3 There is no evidential basis for this requirement. The 2018 SHMA simply states at paragraph 7.37:

*“The sources used for analysis in this report makes it difficult to quantify a need/demand for bungalows in the Borough as Census data (which is used to look at occupancy profiles) does not separately identify this type of accommodation. However, it is typical (where discussion are undertaken with local estate agents) to find that there is a demand for this type of accommodation.”*

- 2.4 Therefore, it is apparent that there is no analysis of need undertaken through the SHMA; it is simply assumed that there is demand because it would be 'typical' to find demand if it had been investigated. The analysis provided in SHBC001 (PQ60) simply points to an ageing population (not exceptionally so) and some anecdotal evidence from Torus. The Council's affordable housing waiting list identifies that 789 applicants need a ground floor property, but the response clarifies that 646 need a one bedroom property whereas 118 need a two bedroom property. Therefore, this particular need is likely best met through the provision of ground floor flats rather than one or two bedroom bungalows, which would be an extremely inefficient use of land.
- 2.5 Clearly, if there is specific demand or need for bungalows, then developers or affordable housing providers can look to provide that on their sites, but they should not be bound to by a policy that has no evidential basis.

## **Issue 2: Housing Standards / Sustainable Design**

### **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?**

- 2.6 Part 2 of the policy states that the Council will apply the optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended).
- 2.7 Firstly, the need for such a requirement has not been justified. For M4(2) dwellings, the SHMA fails to quantify what the need is and/or whether the need can be addressed through M4(1) dwellings. The evidence base also fails to grapple with the existing stock of housing in St Helens,

including how much of it is currently built to M4(1) and M4(2) standards, and how much is capable for conversion to M4(1) or M4(2).

- 2.8 In terms of the requirement for M4(3) dwellings, the plan states at paragraph 6.3.6 that “*there is a need for 6-7% of all dwellings to be for wheelchair users*”. However, the current need figure provided in Table 29 is based purely on an extrapolation from a national report. The projected need figure as a proportion of future growth is actually only 3%. Again, without any evidence of the ability of the current housing stock to meet this need, the policy requirement is not justified.
- 2.9 Secondly, the Council's own viability evidence indicates that such a requirement would not be viable on a number of sites (see Table 6.19 of the Council's viability assessment). The proposal therefore conflicts with paragraphs 56-002 and 56-003 of the PPG.

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

- 2.10 No, we agree with the Council. The NDSS should only be used where there is clear justification. For larger properties in particular, where they may be demanded to provide smaller bedrooms to be used as home offices, they can place an unreasonable burden on development without any clear planning benefit.

### **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?**

- 2.11 The Council's own viability evidence indicates that such a requirement would not be viable on the majority of sites (see Table 6.19 of the Council's viability assessment). In accordance with paragraph 57 of the Framework, it should not be necessary for viability to have to be assessed on a site by site basis due to a policy requirement which is not viable across the plan.