

Warrington Local Plan Examination

Matter 9 – Other Housing Policies

ON BEHALF OF BELLWAY HOMES (2297)

August 2022

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1. Introduction

- 1.1 This Hearing Statement is submitted on behalf of the Manchester division of Bellway Homes Limited (“Bellway”) (Respondent ID: 2297) in relation to the Examination of the Warrington Local Plan (“the Plan”) [SP1].
- 1.2 It has been prepared by Nexus Planning in relation to Matter 9 (Other Housing Policies), which explores whether the Plan is justified, effective and consistent with national policy in relation to the approach to housing density, meeting housing needs and Gypsy, Traveller and Travelling Showpeople provision.
- 1.3 Bellway controls the land to the north of Winwick (“the site”), which is proposed to be allocated by Policy OS6 for a minimum of 130 homes.
- 1.4 Within this context, we provide a response specifically in relation to:
 - Housing density – Questions 1 and 3;
 - Meeting housing needs – Questions 7-12 and 14-16; and
 - Main Modifications – Question 22.
- 1.5 In summary, our responses to the Inspectors’ Matters, Issues and Questions (“MIQs”) conclude that:
 - Question 1 – the minimum densities in Policy DEV1 are **realistic and justified**;
 - Question 3 – Policy DEV1 is sufficiently flexible;
 - Question 7 – the percentages of affordable housing within Policy DEV2 are **justified**;
 - Question 8 – the evidence on viability supports the approach;
 - Question 9 – Policy DEV2 is sufficiently flexible to take account of site specific viability issues;
 - Question 11 – the approach to the mix of housing sizes and types is **justified**;
 - Question 12 – a transitional period should be applied to the introduction of national space standards;
 - Question 14 – the introduction of higher optional standards is **not justified or consistent with national policy**;
 - Question 15 – the approach to housing for older people is **not justified**;
 - Question 16 – the approach towards self and custom build housing is **not justified**;
 - Question 22 – Main Modifications are proposed to parts 11, 13, 15, 16, 17, 18 and 20 of the policy.
- 1.6 To aid the Inspectors, we have cross-referenced our answers to the ‘tests of soundness’ in paragraph 35 of the National Planning Policy Framework, July 2021 (“NPPF”). Where necessary, we have suggested modifications to make the Plan ‘sound’.
- 1.7 We look forward to discussing our Statement and representations with the Inspectors at the hearing session on Wednesday 5 October 2022.

2. Response to Questions

Housing Density

Question 1

What is the basis for the minimum densities set out in Policy DEV1? Are they realistic and justified?

- 2.1 Bellway considers that the minimum densities set out in part 5 of Policy DEV1 are **realistic** and **justified**. In particular, they reflect the minimum density of 30 dwellings per hectare (“dph”) required by Policy OS6 (Winwick).
- 2.2 Such an approach is also **consistent with national policy**, in terms of making effective use of land (Chapter 11 of the NPPF).

Question 3

Is the policy sufficiently flexible to allow particular circumstances to be taken into account?

- 2.3 Whilst acknowledging paragraph 4.1.23 of the Plan [SP1] states the density of development on the allocation sites should be at or above the minimum figures specified in the allocation policies, we believe Policy DEV1 provides sufficient flexibility to allow particular circumstances to be taken into account.
- 2.4 For example, part 6 of the policy allow densities of less than 30 dph where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of an area. As such, Bellway has no concerns and finds the approach to be **effective**.

Meeting Housing Needs

Question 7

What is the basis for the percentages of affordable housing sought and are they justified?

- 2.5 As one of the largest providers and enablers of affordable housing in the UK, Bellway welcomes efforts to improve affordability in Warrington and considers that the percentages of affordable housing sought by Policy DEV2 are **justified**.
- 2.6 In particular, part 1’s requirement for 30% affordable housing provision (elsewhere in the Borough outside Inner Warrington, and on all greenfield sites irrespective of their location) is consistent with the 30% target required by Policy OS6 (Winwick).

Question 8

Does the evidence on viability support the approach to affordable housing in Policy DEV2?

- 2.7 In Bellway’s view, the evidence on viability supports the approach to affordable housing in Policy DEV2, insofar as it relates to the land to the north of Winwick (Policy OS6), which is a greenfield site allocation.
- 2.8 In summary, the Local Plan Viability Assessment (August 2021) [V2] concludes that the site is viable (p128), even with the full policy requirements (including affordable housing). This is consistent with Bellway’s own viability assessment. Therefore, we find the policy to be **justified** in this regard.

Question 9

Is there sufficient flexibility to take account of site specific viability issues?

- 2.9 Bellway finds Policy DEV2 to be sufficiently flexible to take account of site specific viability issues.
- 2.10 In particular, we note that part 8 permits a lower proportion of affordable housing and/or a different tenure split where it can be clearly demonstrated that development would otherwise not be financially viable, or where there is clear evidence from a Registered Provider that an alternative tenure composition is required to ensure a development is deliverable.
- 2.11 Paragraph 4.1.44 of the Plan [SP1] explains that where an applicant submits a viability assessment to demonstrate that full provision of affordable housing is not viable, the Council will undertake an independent review of this assessment, at the cost of the applicant.
- 2.12 In addition, part 9 also allows a commuted sum in lieu of on-site provision to be provided in exceptional circumstances, where the nature of the site is deemed unsuitable for affordable housing.
- 2.13 Therefore, we find the Plan to be **effective** in this regard.

Question 11

Is the approach to the mix of housing sizes and types justified? Is it intended to apply this policy to all developments regardless of size?

- 2.14 Whilst Bellway are committed to delivering a wide range of house types and tenures, it is important that the plan is flexible enough to react to changing needs over the plan period, including at the more local level.
- 2.15 Whilst there is crossover with part 2 of Policy OS6 (Winwick), which requires a range of housing tenures, types and sizes in relation to Bellway's site (see our Matter 7e Statement for details), we are pleased that part 11 of Policy DEV2 more generally refers to the "*most up to date Local Housing Needs Assessment*" as well as "*taking into account site specific considerations*". This is important as there will be many considerations which inform the housing mix for individual sites, and it is essential that they are assessed at the application stage.
- 2.16 In this regard, we find the Plan to be **justified**.

Question 12

Is there justification for the use of Nationally Described Space Standards in terms of need and the effect on viability?

- 2.17 As a national volume housebuilder accredited with the National House Building Council, Bellway complies with all relevant requirements within Building Regulations. However, we understand that Policy DEV2 proposes (in part 13) to introduce the Nationally Described Space Standards ("NDSS"), which are voluntary optional (rather than mandatory) standards.
- 2.18 Paragraph 020 of the 'Housing: optional technical standards' section of Planning Practice Guidance ("PPG") (Reference ID: 56-020-20150327) states where a need for internal space standards is identified, local planning authorities ("LPAs") should provide justification for requiring internal space policies, taking account of need, viability and timing.

- 2.19 Whilst Bellway provides a good range and mix of spacious house types which appeal to prospective buyers and meet needs, we respectfully request that as a very minimum, the Inspectors should consider delaying the introduction of NDSS in part 13 for a 12-month transition period to allow developers to factor in the cost of such standards. This would ensure the Plan is **justified**.

Question 14

Are the requirements for Accessible and Adaptable dwellings and Wheelchair User dwellings justified and consistent with national policy? How has the effect on viability been taken into account?

- 2.20 Again, as a national volume housebuilder accredited with the National House Building Council, Bellway complies with all relevant requirements within Building Regulations regarding accessibility, adaptability and wheelchairs. However, we are concerned that the evidence does not support the introduction of higher voluntary optional (rather than mandatory) standards in Policy DEV2.
- 2.21 By way of context, we note that Policy DEV2's requirement (in part 15) for all homes to be accessible/adaptable (Part M4(2)) and (in part 16) for 10% to be wheelchair user dwellings (Part M4(3)) has increased from the Proposed Submission Version Local Plan (March 2019) [PVL1], which set out targets for 20% and 5% respectively. The application of these optional standards could negatively impact on housing delivery and may reduce the capacity of allocations.
- 2.22 Paragraph 007 of the 'Housing: optional technical standards' section of PPG (Reference ID: 56-007-20150327) sets out the evidence that should be used by LPAs when setting higher accessibility, adaptability and wheelchair housing standards.
- 2.23 Bellway does not disagree that there is an ageing population, or that there are groups with specific needs (including those with disabilities or mobility issues) who would benefit from more specialist housing. However, we find there to be a disconnect between the Local Housing Needs Assessment's (August 2021) [H2] findings and the percentage figures then translated into policy (100% and 10% respectively), which, in our view, appear to be arbitrary. There is no Warrington specific evidence to justify all new housing meeting this standard.
- 2.24 In relation to the M4(2) optional standard, H2 merely shows that the age structure for Warrington is similar to the regional and national average, and that there are lower levels of disabilities and health problems. Furthermore, there will inevitably be site specific circumstances where housing cannot comply with this requirement (e.g. for topographical reasons or for upper floor flatted development). There is also no assessment as to what proportion of needs can be met through M4(1) housing, or what proportions of the existing stock can be converted to M4(1) or M4(2) housing.
- 2.25 In addition, H2 does not provide clear evidence in terms of the optional M4(3) standard. The only information provided relates to UK-wide data, which is acknowledged as having shortcomings in terms of its validity. There is no indication that there is a particularly high proportion of wheelchair users in Warrington and there is no assessment of the existing housing stock across the Borough. Instead, H2 takes the national average and assumes that 25% of those wheelchair households have the means and desire to move to a new build house rather than seek to adapt their own homes (e.g. through grants available). Furthermore, H2 suggests the need for wheelchair accessible dwellings is much higher for social rented units than it is for owner occupier units (paragraph 10.119).
- 2.26 Notwithstanding this, it is far too simplistic to conclude that because a requirement is allegedly supported by the Viability Assessment (August 2021) [V2] that it should translate into policy. There may be other ways for the Plan to

ensure such needs are met. For example, allocating additional sites to meet specific needs, such as for later living. This was a recommendation of paragraph 8.60 of the Local Housing Needs Assessment (March 2019) [H3].

- 2.27 Alternatively, seeking a higher contribution from homes to which the Council has nomination rights to address any under-delivery from other schemes, as recommended by paragraph 10.128 of H2. This is presumably in recognition of PPG paragraph 009 which states that “*Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling*” (Reference ID: 56-009-20150327).
- 2.28 Notwithstanding this, part 17 of the policy also does not consider there may be other site-specific factors (beyond viability and technical reasons) which make a site less suitable for such standards, as acknowledged by PPG paragraph 008 (Reference ID: 56-008-20160519). Again, whilst Bellway are committed to delivering a wide range of house types to different specifications, any requirements should be determined on a site-by-site basis, with consideration given to the need of the individual area in question and site specific considerations, as this may differ by location.
- 2.29 However, the evidence base simply does not support the requirement for the optional M4(2) standard to be met across all new homes. In addition, the requirement for the optional M4(3) standard across 10% of new homes is disproportionate, and given the lack of evidence, the Council should consider other ways of meeting needs of older people.
- 2.30 As such, much more flexibility is required at the planning application stage, as opposed to imposing a blanket approach across all development.
- 2.31 By way of comparison with a neighbouring authority, the requirements for Warrington are significantly higher than those contained within the recently adopted St Helens Local Plan, which merely requires 20% of homes to be Part M4(2) compliant and 5% to be Part M4(3). Notwithstanding this, the Inspector found it would be reasonable to include a 12-month transition period to allow developers to factor in the cost of such standards. An extract of the Inspector’s Report and Main Modifications Schedule is provided at **Appendix 1**.
- 2.32 Therefore, we find the higher voluntary optional standards are **not justified** or **consistent with national policy** and therefore parts 15, 16 and 17 should be removed from the Plan.
- 2.33 Alternatively, we would respectfully request that as a very minimum, the Inspectors should consider delaying the introduction of the higher optional standards, as per the St Helens approach. This could be ensured through the insertion of a new part 16A. In addition, part 17 would need to be amended to reflect the approach taken in part 11, i.e. by making reference to local need and site specific considerations.

Question 15

Is the approach towards housing for older people justified? How would part 18 of Policy DEV2 be implemented in practice, what is meant by housing for older people and to what extent is this issue covered by the approach to Accessible and Adaptable dwellings and Wheelchair User dwellings?

- 2.34 Given our concerns raised with the proposed introduction of voluntary standards for wheelchair user dwellings (Part M4(3)) above, we similarly do not consider the evidence base supports provision for older people being required from all residential developments with 10 or more dwellings.

2.35 Bellway therefore finds the the approach to housing for older people in Policy DEV2 is **not justified**, and as such, it recommends that part 18 should be deleted.

Question 16

Is the approach towards self and custom build housing justified? How will it be implemented?

- 2.36 Whilst we acknowledge that Policy DEV2 part 20 supports self and custom build housing generally, we are concerned that the Plan's [SP1] overall approach to this is **not justified**.
- 2.37 As per our Matter 7e Statement, we have set out our concerns in relation to Policy OS6 (Winwick) part 4 which requires specific provision for self and custom build housing on the site. The land to the north of Winwick is not alone; the same approach has also been taken to the other allocations, which is unsound.
- 2.38 Paragraph 025 of the 'Self-build and custom housebuilding' section of PPG (Reference ID: 57-025-20210508) requires authorities to consider how local planning policies may address identified requirements for self and custom housebuilding to ensure enough serviced plots with suitable permission come forward. For example, as a number of units required as part of certain allocated sites or on certain types of site. As regards the former, the paragraph goes on to state that authorities can play a key role in brokering and facilitating relationships to help bring suitable land forward, including *"when engaging with developers and landowners who own sites that are suitable for housing, and encouraging them to consider self-build and custom housebuilding, and facilitating access to those on the register where the landowner is interested"*.
- 2.39 However, whilst the Council has engaged with Bellway generally regarding the deliverability of the site, no engagement in the context of self and custom build housing has occurred. Furthermore, it is unclear whether what progress the Council has made in relation to the other five bullets within PPG paragraph 025.
- 2.40 In addition, Bellway is not aware of any substantive evidence to justify the provision of self and custom build housing. It is understood that the Council's self-build register shows limited need; the Local Housing Needs Assessment (August 2021) [H2] identifies a waiting list of 168 on the Self-Build Register (Table 95), but the report itself notes that there may be some double-counting (paragraph 10.131). There is no indication that the Council has sought to understand the preferences (e.g. location and type of housing) of those who have expressed an interest. As regards the land to the north of Winwick, neither Bellway nor the existing landowner have received any expressions of interest on the site. Indeed, we anticipate that such a large housing estate would not be attractive to self/custom builders.
- 2.41 In our view, to obtain a robust assessment of the demand for self/custom build housing, LPAs should assess and review the data held on their registers, and then supplement it with secondary data from sources such as building plot search websites, 'Need-a-Plot' information available from the Self Build Portal and enquiries for building plots from local estate agents. The Council should also reflect on the delays that could be caused by the delivery of complex self/custom builds on all sites.
- 2.42 By way of comparison, the recently adopted St Helens Local Plan recognises that there has been very limited demand to be included on the Self-Build Register (paragraph 6.3.13). Unlike Warrington, St Helens does not require self and custom build housing on specific allocations. It merely supports *"the delivery of suitably designed and located self-build and custom-build schemes in the Borough where they would conform with all relevant local and national policies"* (Appendix 2).
- 2.43 We therefore recommend this approach is followed in Warrington, by amending part 20.

Main Modifications

Question 22

Are any main modifications to the above policies necessary for soundness?

2.44 As stated above, Bellway suggests the following Main Modifications would improve the soundness of the Plan:

Policy DEV2 part 11 – to improve the policy from an effective perspective

2.45 We note that there are two part “11”s within the policy which needs to be rectified.

Policy DEV2 part 13 – to improve the policy from a justified perspective

2.46 Amend part 13:

*“13. The Council will seek to provide dwellings that are appropriately sized and arranged to create well designed homes in accordance with Nationally Described Space Standards. **A 12 month transition period will be applied from the adoption date of the Plan, following which time this requirement will apply to all relevant sites subject to a planning application.**”*

Policy DEV2 parts 15, 16 and 17 – to improve the policy from a justified perspective and consistency with national policy

2.47 Delete parts 15, 16 and 17.

2.48 Alternatively, following the St Helens approach (which is more proportionate), insert a new criterion:

*“**16A. As regards parts 15 and 16 of this policy, 12 month transition period will be applied from the adoption date of the Plan, following which time these requirements will apply to all relevant sites subject to a planning application.**”*

2.49 In addition, amend part 17:

*“17. In cases where **there is no local need for** the above requirements, **or where they** are genuinely not viable, ~~or technically feasible,~~ **or there are other site-specific factors,** the Council will expect to see ~~an open book assessment to~~ evidence this before any lower level of provision is permitted.”*

Policy DEV part 18 – to improve the policy from a justified perspective

2.50 Delete part 18:

“~~18. In residential development of 10 dwellings or more housing for older people should be provided.~~”

Policy DEV2 part 20 – to improve the policy from a justified perspective

2.51 Amend part 20:

“20. ~~The Council will ensure a sufficient supply of plots for self-build and custom-build housing to meet the identified need on the Council’s register.~~ Applications for self-build and custom housing development will be supported, subject to consideration against the other relevant policies in the Plan.”

Appendix 1

Extract from St Helens Local Plan Inspector's Report and Main Modifications Schedule

should not be sought for residential developments that are not major developments. Therefore, the policy should align with the Framework in referring to developments of 10 or more dwellings. **MM022** secures this change so that Policy LPC02 is consistent with national policy.

315. During the examination the Government introduced, through its Written Ministerial Statement of May 2021 and revisions to the PPG, a requirement that 25% of affordable housing should be First Homes, a specific kind of discounted market housing. However, the PPG includes a transition period for plan-making. Thus, this Plan does not need to reflect the First Homes policy requirement. That said, the Plan should recognise that First Homes would need to be addressed by an update of the Plan. This would be achieved by **MM022** so that the Plan is consistent with national policy.

Housing Standards

316. Policy LPC01 requires a proportion of adaptable and accessible homes on larger housing developments. However, the policy is not clear as to whether it is seeking wheelchair adaptable or wheelchair user dwellings under Part M4(3) of the Building Regulations. In addition, in applying the requirements for adaptable homes under Parts M4(2) and M4(3), it is reasonable for a transition period to be included so that developers can factor in the cost of such standards. **MM021** clarifies both these matters so that Policy LPC01 is effective. Following the MM consultation, we have reverted to the original wording of Part 2. a) of the policy in relation to 'accessible and adaptable' dwellings under Part M4(2) and amended the wording of Part 2. b) and the reasoned justification so that it refers specifically to 'adaptable dwellings' under Part M4(3)(2)(a) for clarity.

317. Policy LPC13 promotes the sustainable design of new homes but does not include any specific provisions linked to particular standards. The Written Ministerial Statement of 2015 remains extant Government policy in setting energy standards for new homes. **MM032** would ensure that the requirements for a standard equivalent to the Code for Sustainable Homes Level 4 is incorporated within Policy LPC13 so that it is effective and consistent with national policy. Such standards are likely to be replaced by the Future Homes Standards by 2025.

Gypsies, Travellers and Travelling Showpeople

318. The needs of gypsies, travellers and travelling showpeople were assessed in the Merseyside and West Lancashire Gypsy and Traveller Accommodation Assessment [GTAA] of 2015 (GYP001). The GTAA identified a need for 8 residential pitches and 3 transit pitches up to 2032/33, but no need for plots for travelling showpeople. However, the Plan recognises that the need for residential pitches has increased since 2015 due to household growth and

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| MM021 | 79 | LPC01 Section 1 | “1. New market and affordable housing must should be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by up-to-date , relevant evidence including the Borough’s latest Strategic Housing Market Assessment (SHMA).” |
| | 79 | Section 2 | “2. Where a proposal for new housing would be on a greenfield site on which the site as a whole would deliver 25 or more new homes, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that: a) At least 20% of the new dwellings across the whole site must be designed to the “ <i>accessible and adaptable</i> ” standard set out in Part M4(2); and b) At least 5% of the new dwellings across the whole site must be designed to the “ <i>wheelchair user adaptable</i> ” dwellings standard set out in Part M4(3) (2)(a)” |
| | 79 | Section 3 | “3. At least 5% of new homes on greenfield sites that would deliver 25 or more dwellings should be bungalows. Exceptions to paragraphs 1 and 2 to 3 of this Policy may be made where the applicant” |
| | 79 | Section 5 (to be re-numbered to section 4) | “ 5 4 . The Council will work with partners to facilitate the provision of bungalows, and specialist and supported housing for elderly and vulnerable people. 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 to meet the needs of future occupiers. |

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| | | | <p>....”</p> <p><i>Re-number subsequent policy sections.</i></p> |
| | 81 | Reasoned Justification Paragraph 6.3.3 | <p>“6.3.3 ... extend this assessment of annual need up until the end of the Plan period (20372035). Of the overall housing provision of 10,2069,234234 dwellings (set out in Policy LPA05) it is therefore anticipated that about 2, 457,223 (24%) should be affordable. The amount of”</p> |
| | 82 | Reasoned Justification, paragraph 6.3.8 | <p>“6.3.8 Having regard to these factors (including the findings of the St. Helens Local Plan Economic Viability Assessment 2018), Policy LPC01 requires that in new developments of 25 or more dwellings, at least 20% of the new homes will be constructed to ‘accessible and adaptable’ standards, as contained in Part M4(2) of the Building Regulations, and that at least 5% of new homes should be designed to the ‘wheelchair user’ adaptable’ dwellings’ standards set down in Part M4(3)(2)(a) of the Building Regulations. This will ensure that a proportion of all homes available in the Borough will be suitable and / or can be adapted, without undue difficulty, for occupation by residents who are wheelchair users and to ensure that these homes will also be accessible to visitors with limited mobility. A 12 month transition period will be applied from the adoption date of the Plan, following which time this requirement will apply to all relevant sites subject to a planning application, unless an exception as outlined in section 4 of the Policy is demonstrated by site specific evidence.”</p> |
| MM022 | 84 | LPC02 Section 2 | <p>“2. Proposals for new open market housing developments of 4+10 units or more, <u>or when the number of units is not known, sites of 0.5ha or more,</u> will be required to.....”</p> |
| | 88 | Reasoned Justification, paragraph 6.6.9 | <p>“6.6.9 The St. Helens Affordable Housing SPD (2010) will be updated as necessary to assist the implementation of Policy LPC02. <u>Furthermore, it is acknowledged that ‘First Homes’ have been introduced by the Government and fall within the definition of ‘affordable housing’.</u>”</p> |

Appendix 2

Extract from St Helens Local Plan (Policy LPC01)

6. Homes and Communities

6.1 Policy LPC01: Housing Mix

Policy LPC01: Housing Mix

1. New market and affordable housing should be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by up-to-date, relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA).
2. Where a proposal for new housing would be on a greenfield site on which the site as a whole would deliver 25 or more new homes, the Council will apply optional standards as set out in Parts M4(2) and M4(3)(2)(a) of the Building Regulations 2010 (as amended) so that:
 - a) at least 20 % of the new dwellings across the whole site must be designed to the "*accessible and adaptable*" standard set out in Part M4(2); and
 - b) at least 5% of the new dwellings across the whole site must be designed to the "*wheelchair user adaptable*" dwellings standard set out in Part M4(3)(2)(a).

If the standards in Part M4(2) or Part M4(3)(2)(a) are amended or superseded by new standards, the Council will apply the relevant amending or superseding provisions in the same proportions as set out above.
3. Exceptions to paragraphs 1 and 2 of this Policy may be made where the applicant has submitted an independent viability assessment, prepared by a suitably qualified person, which clearly demonstrates that meeting the requirements would render the scheme un-viable. In such cases the Council will weigh any benefits of allowing the scheme in the form submitted against the extent of any failure to meet the requirements in full.
4. The Council will work with partners to facilitate the provision of bungalows, and specialist and supported housing for elderly and vulnerable people. 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 to meet the needs of future occupiers.
5. The Council will support the delivery of suitably designed and located self-build and custom-build schemes in the Borough where they would conform with all relevant local and national policies.
6. Proposals for the change of use or sub-division of existing buildings to form flats or Houses in Multiple Occupation (HMOs) will be granted permission provided they would:
 - a) retain a suitable mix of housing types to meet needs in the area;

Table 6.2: Projected Change in Population of Older Persons (2016 to 2033)⁴²

| | Under 65 | 65-74 | 75-84 | 85+ | Total | Total 65+ |
|-------------------|----------|-------|-------|-------|-------|-----------|
| St Helens Borough | -1.9% | 13.2% | 33.4% | 83.7% | 4.0% | 27.3% |
| North West | -1.2% | 21.2% | 37.9% | 68.8% | 5.0% | 32.5% |
| England | 2.6% | 26.2% | 44.5% | 73.1% | 9.0% | 38.3% |

- 6.3.8 Having regard to these factors (including the findings of the St Helens Local Plan Economic Viability Assessment 2018), Policy LPC01 requires that in new developments on a greenfield site of 25 or more dwellings, at least 20% of the new homes will be constructed to ‘accessible and adaptable’ standards, as contained in Part M4(2) of the Building Regulations, and that at least 5% of the new homes should be designed to the ‘wheelchair user adaptable’ dwellings standards set down in Part M4(3)(2)(a) of the Building Regulations. This will ensure that a proportion of all homes available in the Borough will be suitable and / or can be adapted, without undue difficulty, for occupation by residents who are wheelchair users and to ensure that these homes will also be accessible to visitors with limited mobility. A 12-month transition period will be applied from the adoption date of the Plan, following which time this requirement will apply to all relevant sites subject to a planning application, unless an exception as outlined in section 4 of the Policy is demonstrated by site specific evidence.
- 6.3.9 The SHMA Update 2018 also identifies that bungalows are often the first choice for older people seeking suitable accommodation and there is generally high demand for such accommodation when it becomes available. As the population ages, many older residents wish to downsize locally but have a limited range of suitable housing stock to move into. Therefore, the Council will require that, as a general guideline, at least 5% of the market homes provided on developments of 25 or more dwellings on greenfield sites should be bungalows.

Self and Custom Build

- 6.3.10 Self-build and custom house-building are defined in the Housing and Planning Act 2016 as:

“ ... the building or completion by— (a) individuals, (b) associations of individuals, or (c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals ...”

- 6.3.11 Although the terms are used interchangeably, “*custom build*” is where a person commissions a specialist developer to help to deliver their home, while “*self-build*” is where a person is more directly involved in organising and constructing their home. Both routes require significant input from the prospective homeowner in the design of the dwelling.

⁴² St Helens SHMA update 2018 table 19

- 6.3.12 In accordance with the Self-build and Custom Housebuilding Act 2015, the Council maintains a register of individuals and associations of individuals who wish to acquire serviced plots of land to bring forward self-build and custom housebuilding projects⁴³.
- 6.3.13 The Mid Mersey SHMA 2016 and the St Helens SHMA update 2018 did not identify a specific quantum of demand for self-build in the Borough and as of August 2018 there has been very limited demand to be included on the Self-Build Register. However, it is anticipated that as the Register becomes more established, demand for self and custom build plots could increase. Further evidence of need for self and custom build plots will be informed by future SHMAs and updates to the Register. In accordance with national planning policy, legislation and guidance, the Council will support the delivery of housing to meet the needs of people wishing to build their own homes on suitable sites that meet all other applicable policy requirements.

Flats and Houses in Multiple Occupation

- 6.3.14 The sub-division of existing dwellings into flats or to form Houses in Multiple Occupation (HMOs) can make an important contribution to meeting specific needs, for example for single persons or couples. However, it is important that such proposals should be consistent with the latest evidence of housing needs in the area and avoid causing an unacceptable loss of family housing. It is also important that they avoid harming the character or appearance of the area for example by leading to excessive hard surfacing of garden areas to form car parking. Such proposals should also be suitably designed to provide acceptable living conditions for their occupants, for example in terms of outlook and daylight/sunlight and avoid harming the living conditions of neighbouring occupiers. Further guidance concerning such proposals will be set out in a future SPD.

⁴³ The Council's Self-Build and Custom Build Register is available on its website and further information is available via the Government endorsed self-build portal at <http://www.selfbuildportal.org.uk/custombuild>

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