

Local Plan  
St Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP



SENT BY EMAIL  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
13/01/2022

Dear Planning Policy Team,

### **ST HELENS LOCAL PLAN: MAIN MODIFICATIONS**

1. Thank you for consulting with the Home Builders Federation (HBF) on the St Helens Local Plan Main Modifications consultation.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The HBF would like to submit the following comments on the proposed Main Modifications.

#### **MM001: References to 2035**

4. The Council propose to amend the Plan period to 2020 to 2037 rather than 2035, to ensure a 15-year plan period on adoption of the Plan. The HBF considers that this is an appropriate modification.

#### **MM009: Policy LPA05**

5. The Council propose to increase the overall housing requirement from 9,234 to 10,206 for the period from 2016 to 2037 due to the extension of the Plan period. The HBF considers that it is appropriate to extend the Plan period and as such to increase the overall housing requirement to reflect that. However, the HBF continues to be concerned that the 486dpa does not reflect the evidence particularly in relation to economic development. The HBF considers that given the evidence contained within the SHMA, the SHELMA, the ELNA, the Liverpool City Region Growth Strategy and Growth Deal and the previous delivery of homes that the Council should include an uplift in the housing figure above that provided by the Standard Methodology and above that currently proposed. Therefore, the HBF does not consider that this modification is sound.

#### **MM021: Policy LPC01**

6. The Council propose some minor amendments to part 1 of this policy to improve clarity and consistency with the NPPF. The HBF continues to 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; ensures that the scheme is viable; and provides an appropriate mix for the location. The HBF considers that the addition of 'up to date' relevant evidence is an improvement, but the policy could still be improved by highlighting that other evidence would also be considered appropriate such as information related to site characteristics, viability, and local aspirations.

7. The Council propose to amend this policy in relation to the M4(2) and M4(3) requirements for clarity. The HBF does not consider that the current proposal improves the clarity of the policy and the HBF continues to have concerns around the justification of this policy and does not consider that the Council has provided sufficient evidence to justify the requirements that have been set.
8. If the Council intends to retain this policy the HBF proposes the following amendment would improve the clarity and clearly set out what the Council require in relation to the wheelchair adaptable dwellings:
  - 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).*
9. The HBF also considers that the policy needs to reflect the requirements of the PPG. So additional text should be added which states that:

*The Council will also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M will be applied.*
10. The HBF supports the Council in deleting the requirement for at least 5% of new homes on greenfield sites to be bungalows, and agree that the requirement was not justified in terms of need or viability.
11. The HBF supports the amendment to the reasoned justification paragraph 6.3.8 to include a 12 month transitional period from the adoption of the Plan in relation to the M4(2) and M4(3) requirements.

### **Future Engagement**

12. I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
13. The HBF would like to be kept informed of the publication of the Inspectors Report and the adoption of the Plan. The HBF would also like to continue to receive information in relation to any other forthcoming consultations in relation to the Local Plan and

associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'J. Harding'.

**Joanne Harding**

**Planning Manager – Local Plan (North)**

Email: [joanne.harding@hbf.co.uk](mailto:joanne.harding@hbf.co.uk)

Phone: 07972 774 229