

Planning Policy Team
Halton Borough Council
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SENT BY EMAIL
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Dear Planning Policy Team,

HALTON DELIVERY AND ALLOCATIONS LOCAL PLAN: MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Halton Delivery and Allocations 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 comment on a selection of the proposed modifications that are considered to have implications for the home building industry.

MM003: Policy CS(R)1: Halton's Spatial Strategy

4. The Council proposes to maintain the housing requirement as at least 8,050 additional dwellings for the period 2014-2037. The HBF does not consider that this proposed modification is sound, as it is not positively prepared or justified.
5. The HBF is disappointed that the Council has not taken the opportunity to increase the housing requirement to better reflect the evidence, and to support further growth and development in the authority, as set out in our previous representations.
6. The Council also propose to add a new section into this policy in relation to the residential developments of 10 or more dwellings within 5km of protected accessible coasts and the discharging of their HRA requirements in relation to recreational disturbance. The HBF considers that this modification is not sound and should be amended to ensure clarity.
7. The HBF considers that this approach is not in line with the evidence provided by the Towards a Liverpool City Region European Sites Recreation Mitigation & Avoidance Strategy –Evidence Report (Version 24) July 2021. Paragraph 7.51 states that a spatial approach to recreation pressure avoidance and mitigation is a well-established approach and that for the LCR two zones have been set up, one an inner core of up to 5km to the



European site boundaries, however, it goes on to state that 5km has been adjusted according to local factors such as accessibility of the European site coast e.g. in Halton the south bank of the Mersey Estuary is excluded because there is no public access to the designated sites. Therefore, the HBF considers that the policy and the justification need to be clear that the policy reference to 'accessible coasts' is unlikely to include the south bank of the Mersey Estuary.

MM009: Policy CS(R)12: Housing Mix and Specialist Housing

8. The Council propose to amend Policy CS(R)12 to state that 'the mix of new property types delivered **are encouraged to** contribute to addressing identified needs', the HBF considers that this modification is appropriate.
9. The Council also propose to delete reference to the delivery of Lifetime Homes and to replace this text with 'the Council will encourage designs of dwellings that can be adapted should they be required'. The HBF considers that the deletion of reference to Lifetime Homes is appropriate.

MM010: Policy CS(R)13: Affordable Homes

10. The Council propose to amend this policy to increase the site size threshold from 0.33 to 0.5ha in size, the HBF considers that this modification is appropriate and in line with national policy and guidance.
11. The Council also propose to delete part 2 of the policy in relation to Starter Homes, the HBF considers that this is appropriate.
12. The Council proposes to amend part 4 of the policy in relation to the tenure split of the affordable housing. It proposes to retain the split of 74% affordable or social rent and 26% intermediate but adds further text which states, 'where practicable and unless evidence justifies a departure from this requirement'. It goes on to suggest that the homes for affordable home ownership can be provided within the intermediate proportion of affordable housing provision. The HBF is concerned that the 26% intermediate housing of the 20% or 25% affordable housing provision would not be consistent with the NPPF. The NPPF¹ states that for major housing development planning policies should expect at least 10% of the homes to be available for affordable home ownership. If 100 homes were to be built, based on the NPPF, 10 of those homes should be available for affordable home ownership. If these homes were on a strategic site, based CS(R)13 it is assumed there would be 20 affordable homes, and 26% of these homes (5 homes) would be of an intermediate tenure including affordable home ownership.
13. The HBF does not consider that this modification is sound, as it is not consistent with national policy. The tenure split set out in the policy should be amended and should ensure that the requirements of the NPPF for 10% of homes to be for affordable home ownership are incorporated, and to make clear what tenure split would be expected for any additional affordable homes provided.

¹ NPPF paragraph 65

14. The HBF notes the additional of a new paragraph after 7.90 which states that affordable units secured through the operation of this policy should be provided in perpetuity. The HBF considers that in order to provide consistency with the modification to Policy CS(R)13 section 4 that this new paragraph should also state 'where feasible'.

MM026: Policy RD6: Custom and Self Build Housing

15. The Council propose to delete this policy and to replace it with a new policy which will actively support proposals for self-build homes in locations consistent with the spatial strategy, and in areas where the Council has evidence of strong local demand will encourage developers to consider whether an element of self-build could be incorporated into the housing mix.
16. The HBF considers that the deletion of this policy and the replacement with a supportive and encouraging policy is more appropriate.

Future Engagement

17. 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.
18. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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