

## **Matter 10 - Infrastructure and Delivery & Matter 11- Monitoring and Implementation**

### **Issue 2: Developer Contributions**

*The Council accept that viability is a challenge in parts of the Borough (SHBC001). The Plan seeks to achieve an appropriate level of developer contributions through a zonal approach to affordable housing (Policies LPA02 and LPC02). However, a zonal approach is not used for other infrastructure. That said, Policy LPA08 recognises that economic viability will be an important consideration in assessing proposals.*

*The Council has stated (SHBC001) that the intention is to provide flexibility in requiring developer contributions to take account of viability constraints. Essentially, it appears that decisions on developer contributions, apart from affordable housing, would be made on a site by site basis with developers needing to undertake site specific viability appraisals.*

### **7. How is the strategy in relation to developer contributions to be implemented by the LP (see SHBC001 – PQ69)?**

The viability issues within St Helens are clearly set out in the Viability Assessment and are reiterated by the Council in their response to PQ69. The HBF is concerned that given that these issues and challenges are known and acknowledged that the Council are still relying on the developers and applicants to provide Viability evidence on a site-by-site basis. The NPPF 2019 provided a clear shift in national policy it places a lot more emphasis on the viability of the policies within the Local Plan to help ensure sound plans with a good range of proven deliverable sites. Paragraph 34 states that policies should set out contributions expected from development and that such policies should not undermine the deliverability of the Plan. Whilst paragraph 57 makes it clear that viability assessment of plans should mean that planning applications are viable and should not require further individual viability assessment. The PPG<sup>1</sup> strengthens this position and states that the role for viability assessment is primarily at the plan making stage. It goes on to highlight that policy requirements should be set at a level that allows for development to be deliverable without the need for further viability assessment at the decision-making stage unless it can be demonstrated that circumstances have changed. Thus, the robustness of the Plan stage viability is key. The HBF considers that this policy should be amended to better reflect these acknowledged issues and challenges.

### **8. Is the approach set out in Policy LPA08 effective and does it strike the right balance between flexibility and certainty for applicants?**

The HBF does not wish to answer this question, at this time.

### **Issue 3: Viability**

*The delivery of the LP, particularly the allocations, will depend on whether sites are viable. The policies of the LP may impact on viability. Whether specific sites are deliverable or developable has been considered under Matter 4. However, this issue provides an opportunity to consider whether overall the EVA and its assumptions are robust. The EVA*

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<sup>1</sup> PPG ID:10-002

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*concludes that: 'the overall scale of obligations, standards and policy burdens contained in the Local Plan are not of such a scale that cumulatively they threaten the ability of the sites and scale of development identified in the Plan to be developed viably.' (Paragraph 7.37)*

**9. Does the EVA make realistic assumptions about land values, sales values, finance, profit and development costs?**

The HBF does not wish to answer this question, at this time.

**Issue 5: Parking standards and vehicle charging points**

*Section 9 of Policy LPA07 refers to parking standards being included in a review of the Ensuring a Choice of Travel SPD, June 2010 (LOC009). However specific requirements for parking standards and vehicle charging point are not specified in the Plan.*

*The Council have indicated that the provision of vehicle charging points was subject to viability testing in the EVA. The EVA also assessed parking provision for new development on the minimum standards set out in Appendix 3 of the Council's existing Ensuring a Choice of Travel SPD (2010) (LOC009).*

*The Council has indicated that an update for this SPD is planned but that it will not be completed until after the Local Plan is adopted.*

**23. Is the policy effective and clear without the inclusion of the requirements for parking and vehicle charging point (possibly as an Appendix)?**

The HBF considers that it would have been beneficial to set out the vehicle and cycle parking standards and other requirements within the Plan, as it will be difficult to determine their implications in relation to other policy requirements and viability if they are not considered as part of the preparation of the Plan.

**24. Should the LP be more prescriptive in requiring charging points having regard to Section 9 of the Framework and the evidence base (EVA)?**

The HBF considers that the Plan does not need to be more prescriptive in requiring electric vehicle charging points (EVCP), the HBF considers that the Plan does not need to refer to EVCPs at all, as it is likely that this will in future be covered by Building Regulations.

The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. The Department for Transport held (ended on 7th October 2019) a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings, this consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCP in new buildings across the country. The requirements proposed will apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling. It is proposed that EVCPs must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7kW obsolete for future car models, 7kW is considered a sufficiently future-proofed standard

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for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M. The Government has estimated installation of such charging points add on an additional cost of approximately £976.

The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost.

Therefore, the HBF considers that this policy requirement will be unnecessary and a repetition of building regulations. However, if the policy were to be included, the HBF considers that the Council will need to ensure they have fully considered the viability of the requirement, the capacity of the network to deliver this requirement and considered potential exemptions to the requirement.

***25. Could the requirements set out in the existing SPD be referred to if the intention is to keep any future updates broadly similar?***

The HBF does not wish to answer this question, at this time.