

# Placemaking & Communities

## Housing Standards – Our Considerations

### 1. Issues and Opportunities

1.1. The [Liverpool City Region Housing Statement \(2019 – 2024\)](#) sets out that the Combined Authority want to ensure that the quality of new housing is of a high standard, well designed, accessible, thermally efficient, technologically linked and future proof. To help tackle climate change, a target of ‘net zero’ carbon by 2040 has been set in the City Region and a [climate emergency](#) was declared in 2019. The Metro Mayor has also [challenged house builders](#) to make the City Region an exemplar for innovation, sustainability and design excellence. In addition, where justified, national planning policy and guidance allows certain types of additional housing standards to be a requirement for new residential development. The national and City Region policy context is summarised further on in this document.

1.2. Key statistics relevant to housing standards in the City Region include:

- Based on 2019 Council Tax data from the Value Office Agency, 44% of properties in the City Region were built pre-1939, compared to 37% nationally.
- Of the EPCs lodged since 2008, 63% were rated D or below, compared to 37% EPC rating C or above in 2019, demonstrating the poor quality and energy efficiency of properties in the Liverpool City Region, compared to the national average of 61%<sup>1</sup>.
- 13.2% of households in the Liverpool City Region currently experience fuel poverty compared to 10.3% nationally<sup>2</sup>.
- ONS 2019 population estimates suggest that 19% of the City Region are 65 years and over compared to 18.4% nationally. By 2050, the over 65 age group is set to increase to 24.7% of the national population<sup>3</sup>.
- 2019 evidence indicates that 47% of the top 10% of lower super output areas in the City Region are the most health deprived nationally. Areas of high health deprivation tend to be associated with high levels of multiple deprivation.

---

<sup>1</sup> MHCLG (2020) Live Tables on Energy Performance of Building Certificates.

<sup>2</sup> BEIS (2020) Sub-regional Fuel Poverty 2018 data.

<sup>3</sup> ONS (2019) Mid-Year Population Estimates.

- Based on 2019/2020 data, the City Region has a higher than average amount of 16 to 64 year olds who are long-term disabled (as defined by the Equality Act), or have work limiting disability (23.6%) compared to national (21.4%) figures, indicating higher rates of people with limiting health conditions<sup>4</sup>.
- Based on 2011 ONS Census data, approximately 6% of properties are overcrowded, with 1% experiencing extreme overcrowding in the Liverpool City Region, compared to the national average of 8%.
- The COVID-19 pandemic has demonstrated the need for high quality external amenity space. During lockdown, 12% of households in Great Britain did not have access to private or shared garden space and the North West of England has below national levels of accessible public open space according to 2020 evidence<sup>5</sup>.
- According to [Waterwise](#), average water consumption per person per day is 141 litres nationally. In the North West of England, whilst it is indicated that water stress levels are not serious, there are moderate levels of stress according to the [Environment Agency](#). [DEFRA](#) indicate that water stress is likely to persist and worsen based on a number of environmental factors including increasing summer temperatures and a reduction in rainfall. The [Climate Change Committee](#) promotes increased water efficiency measures by 2030 of 105 litres per person per day.

## 2. What is the Spatial Development Strategy required to do?

2.1. Paragraph 127f) of the [National Planning Policy Framework](#) sets out that planning policies should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. The corresponding footnote states that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing (where this would address an identified need for such properties), and that policies may also make use of the nationally described space standards, where the need for an internal space standard can be justified. Guidance on justifying optional technical

---

<sup>4</sup> NOMIS (2020) Annual Population Survey.

<sup>5</sup> RTPI (2020) Planning for the World We Need.

standards can be found in the [National Planning Practice Guidance](#), whilst the nationally described space standards can be found [here](#).

- 2.2. The NPPF also sets out the need to take flood risk into account through the use of natural flood management techniques such as sustainable drainage systems (SuDS) where appropriate.
- 2.3. The [National Design Guide](#) (NDG) is also relevant and identifies ten characteristics that make a well-designed place, one of which relates to 'homes & buildings'. Under this characteristic, the NDG identifies that well-designed homes and buildings: provide good quality internal and external environments for their users, promoting health and well-being; relate positively to the private, shared and public spaces around them, contributing to social interaction and inclusion; and resolve the details of operation and servicing so that they are unobtrusive and well-integrated into their neighbourhoods. The NDG also refers to tree planting, water efficiency, cycle storage, and sets out well-designed buildings follow the energy hierarchy, which includes maximising the potential for energy supply from decentralised, low carbon and renewable energy sources.
- 2.4. Street trees have been promoted in the Government's Planning White Paper [Planning for the Future](#). Tree planting can mitigate some of the impacts of climate change, sequester carbon emissions and make developments more attractive. [Mersey Forest](#) have planted over 9 million trees and have set tree planting goals to increase woodland cover to 20% of the area. Nationally the [Forestry Commission](#) have set out goals to plant 30,000 hectares of trees per year by 2050, whilst the Government have recently completed a [consultation to inform a new Tree Strategy](#) to set out policy priorities to deliver an ambitious tree planting programme. The consultation document further reinforces the Government's commitment to street trees and states a need to ensure appropriate trees are incorporated in development, in ways that they can thrive, be easy to maintain, and minimise the risk of damage or interference with buildings or infrastructure.
- 2.5. The Government intend to consult further on a number of matters relating to housing standards, which include the [Future Homes Standard \(2025\)](#) and the [National Tree Strategy](#). Recently the Government begun a consultation on [Raising Accessibility Standards for New Homes'](#) , whilst previous other relevant consultation includes

electric vehicle charging points in the [Road to Zero Strategy \(2018\)](#). In its response to its consultation on [delivering gigabit-capable connections](#), the Government intends to amend Building Regulations to place obligations on housing developers to work with network operators to install gigabit broadband where this can be done within a commercial cost cap. Further details on our suggested digital connectivity policy approach are set out elsewhere in this engagement.

- 2.6. We will review our suggested approach to housing standards when further details are available on these cited Government consultations. However, subject to development viability, we are considering accelerating a number of these standards by including them within a suggested housing standards policy.
- 2.7. The quality of new homes will have a direct effect on achieving the City Region's carbon neutrality target. Indeed the [Climate Change Committee report 'UK housing: Fit for the future?'](#) recognise that new homes must be built to be low-carbon, energy and water efficient and climate resilient. The Climate Change Commission also state that the cost of meeting the aims of its report are not prohibitive and that getting design right from the outset is vastly cheaper than forcing retrofit later on. Nonetheless, any housing standards required by the SDS would need to form part of a wider viability appraisal to ensure housing delivery is not detrimentally affected.

### 3. What is being done by the Combined Authority?

- 3.1. The Metro Mayor's Manifesto has a number of aims of relevance to housing standards, including:
  - Developing eco-friendly and energy-efficient housing.
  - Expanding and encouraging electric vehicles.
  - Promoting good design and supporting concerted action to improve the quality and attractiveness of neighbourhoods across the City Region.
  - A plan for a fairer, greener housing market.
- 3.2. The Combined Authority understands the importance and benefits of good quality homes. The Liverpool City Region Housing Statement (2019 – 2024) identifies that

‘a decent, good quality home helps support better health, promotes educational attainment, support independent living and can contribute to improving the environment’. The statement also highlights that a quality housing offer supports an inclusive economy, addresses fuel poverty and helps achieve our zero carbon 2040 target, improves community sustainability, helps people live independently for longer, supports the City Region’s ambition to become a world leader in modern construction methods with associated high skilled jobs, and prevents homelessness wherever possible.

- 3.3. As 80% of properties in the Liverpool City Region will remain and be lived in by 2040, there is a need to improve the housing standards of new developments to achieve high quality built and future-ready developments to meet the changing population need<sup>6</sup>. The City Region Housing Statement sets an intention to improve the quality of the existing housing stock, and also identifies that City Region homes are responsible for over a third of total energy consumption and a third of carbon emissions. Current national initiatives for housing retrofit include the national [Green Homes Grant](#), whilst in the City Region, local authorities undertake a number of initiatives such as Eco-Flex, Warm Homes Grant, and boiler replacement and cavity wall insulation funding schemes.
- 3.4. The above initiatives will bring many benefits and make an important contribution to the City Region zero carbon 2040 target. However, as housing retrofit initiatives can often be undertaken without the need for planning permission, they will not be within the direct influence of the SDS.
- 3.5. More recently, the Combined Authority in its [LCR Economic Recovery Plan \(2020\)](#) have committed to ‘Building Back Better’, setting out a number transformational opportunities for place and communities in the City Region for Government support. Ambitions include achieving net-zero carbon neutrality by improving our current housing stocks’ energy efficiency through retrofit initiatives and growing our housing supply across the region to be inclusive and fit for the future.

---

<sup>6</sup> HAPPI (2009) The HAPPI Report, Housing LIN.

#### 4. What you told us

4.1. Of relevance to housing standards, responses to our previous SDS public engagement highlighted challenges and opportunities around:

- Ensuring that design standards promote for accessible and inclusive design for all.
- Development viability.
- Improving energy efficiency of new housing stock.
- Increasing tree-planting.
- Improving health and wellbeing outcomes related to poor quality housing.
- Providing electric charging points for new homes.

#### 5. How we could respond

5.1. The Government's planning system reform white paper [Planning for the Future](#) has a strong focus on design and highlights the importance of preparing local design guides and codes and pattern books. As noted above, alongside the Planning White Paper, we will be monitoring a number of Government consultations relevant to housing standards and will review our approach if necessary. We will also be considering what design standards could be applied to non-residential development such as offices, commercial premises and public buildings.

5.2. At this stage we are considering which recognised housing standards, as set out in the table below, could be included as a housing standard requirement in the SDS. We are interested in hearing your views on which standards would be most appropriate for new homes in the City Region. The standards below are likely to have financial viability implications that could affect housing delivery in the City Region. As such we intend to undertake a viability appraisal of the options suggested below.

Standard	Description
<p>Accessibility Standards</p>	<p>Technical Standard <a href="#">Building Regulations M</a> outlines three options for accessibility;</p> <ul style="list-style-type: none"> <li>• M4(2); ‘Accessible and Adaptable Dwellings’ (Optional)</li> <li>• M4(3); ‘Wheelchair User Dwellings’ (Optional) <ul style="list-style-type: none"> <li>○ M4(3)a – Wheelchair adaptable</li> <li>○ M4(3)b – Wheelchair accessible</li> </ul> </li> </ul> <p>Subject to justification, the SDS housing standard policy could set a requirement for residential development to provide M4(2) and M4(3) dwellings.</p>
<p>Future Homes Standard (2025)</p>	<p><a href="#">The Future Homes Standard (2025)</a> consultation proposes revisions to following parts of the Building Regulations:</p> <ul style="list-style-type: none"> <li>• Energy efficiency standards (Part L)</li> <li>• Ventilation (Part F)</li> </ul> <p>The SDS could potentially bring this standard forward, particularly in light of the City Region net zero carbon target by 2040.</p>
<p>Water efficiency standards</p>	<p><a href="#">Planning Practice Guidance</a> states that where local authorities can demonstrate a local need, tighter optional building regulation standards can be used (110 litres/per person/per day can be implemented).</p> <p>Subject to justification and viability, the SDS could include the above noted water efficiency standard as a housing standard requirement.</p>

<p>Nationally Described Space Standard</p>	<p><a href="#">Nationally Described Space Standard</a> addresses gross internal space for bedrooms, storage, and floor to ceiling height to ensure for adequate space in dwellings. Subject to justification and viability, the SDS could include this housing standard as a requirement.</p>
<p>External Amenity Space</p>	<p>The <a href="#">NDG</a> promote well-designed external space include high quality private and shared space, and balconies. Such space could be private or public and should address usability including environmental factors such as sunlight, shade, noise and pollution. Subject to justification and viability, the SDS could include an external amenity housing standard which identifies a minimum space and quality requirement.</p>
<p>Tree Planting</p>	<p>Subject to justification, consideration of site practicalities and viability, the SDS could require a minimum tree standard for new housing development.</p>
<p>Secure Cycle Storage</p>	<p>The <a href="#">NDG</a> promotes appropriate storage for bicycles, and cycling brings health and environmental benefits. Furthermore, the <a href="#">Liverpool City Region Walking and Cycling Infrastructure Plan</a> supports the uptake of cycling. Subject to justification and viability, the SDS could include a minimum cycle storage standard for new housing development.</p>

<p>Low Carbon/ Renewable Energy Sources</p>	<p>There are a number of renewable energy sources that can help address climate change, such as:</p> <ul style="list-style-type: none"> <li>• Combined Heat and Power (CHP).</li> <li>• District Heat Networks.</li> <li>• Ground Source Heat Pumps.</li> <li>• Solar panels.</li> </ul> <p>Subject to justification, consideration of site practicalities and viability, the SDS could require a renewable low carbon/renewable energy requirement for new housing development.</p>
<p>Electric Vehicle Charging Points</p>	<p>The Government's <a href="#">Road to Zero Strategy</a> intends to amend the Building Regulations to deliver electric vehicle charging points. At present it is not clear if and when these proposed changes will be enacted.</p> <p>Subject to justification, network capacity, consideration of site practicalities and viability, the SDS could bring these changes forward as a requirement for new housing development.</p>
<p>Sustainable Drainage Systems</p>	<p>Sustainable drainage systems have multiple benefits that go beyond flood protection. Specified types of residential development could be required to deliver sustainable drainage systems, subject to site practicalities and viability.</p>

<p>Digital Connectivity Standard (Residential)</p>	<p>As set out elsewhere in this engagement, we suggest a gigabit connection requirement for specified thresholds and types of residential planning applications that would be set prior to residents moving in.</p> <p>Where certain connections are demonstrated not viable or site feasibility is an overriding issue, the requirement would be for the next fastest broadband speed to be secured.</p> <p>For more details on this suggested standard, please see our suggested Digital Connectivity policy approach.</p>
--	--

## 6. Which Objectives will this approach help to achieve?



Addressing health inequalities and creating a healthier City Region



Tackling Climate Change and creating a greener City Region



Creating high quality buildings and places that allow our communities to flourish



Delivering an Inclusive Economy



Embedding Social Value in all aspects of development

## 7. How can we make sure this approach would work?

7.1. We could monitor whether development proposals deliver the relevant housing standard requirements at development management stage.