

2026 Supplementary Planning Document (SPD) consultation

Consultation statement – Affordable and Supported Homes SPD

The Council consulted statutory and other consultees on the draft Affordable and Supported Homes SPD in line with the approved 2018 Statement of Community Involvement (<https://www.sefton.gov.uk/sci>). The consultation period ran from 1st October 2025 to 14th November 2025.

Ten responses were received, from:

- Natural England
- National Highways
- Environment Agency
- Homes England
- Crosby Housing Association
- Sefton Housing
- David Barton
- NHS
- Barratt and David Wilson Homes
- Anchor Hanover

The table below summaries the main issues raised by consultees ('summary of comment'), and how these issues have been addressed in the SPD ('initial response').

Who made the comment?	Comment	Council Response
Natural England	No comment	N/A
National Highways	No comment	N/A
Environment Agency	No comment	N/A
Homes England	No comment	N/A
Crosby Housing Association	Point 5.1 – should specify local connection criterion in the document	Eligibility for social rented, affordable rented, shared ownership or extra care housing is managed by the relevant RPs/providers. As the Council only assess eligibility for affordable homes for sale (discounted

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		and First Homes) it is proposed to make the following amendment to paragraph 5.1: 'Furthermore, as we are seeking to meet local affordable housing need, there will be an additional local connection criterion to be considered eligible <u>for discounted market homes (and First Homes), see below.</u> '
Crosby Housing Association	Point 5.2 – local lettings agreements could encourage long-term sustainability of schemes and tenancies. The absence of a local lettings policy could inadvertently set up schemes that do not have an adequate mix of neighbourhoods.	This is outside the scope of the SPD.
Sefton Housing	Wording should be changed in point 5.2 to reflect that the document is in reference to NEW affordable and social rented properties	Agree – para 5.2 has been updated – see below.
David Barton	Equalise the ratio of affordable and supported homes across the Borough as this is presently skewed outside of the Bootle and Netherton catchment area, displacing more of this elsewhere across the Borough	Do not agree. The split of affordable housing required in different parts of the Sefton reflects the differing needs across the borough and was agreed following the Local Plan examination. The SPD reflects the Local Plan policy and cannot change this ratio.

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David Barton	Provide new incentives for utilisation of existing Old Builds prior to the 1950s for retrofitting to accommodate individual and collective groups' needs	This comment is not relevant to the scope of this SPD.
David Barton	Remove the incentive for demolition for demolition for new housing on the grounds that this will drive up demolition applications, adversely impacting upon SMBC's climate action plan for 2030 beyond the already missed targets stated in 2024/25 report.	This comment is not relevant to the scope of this SPD.
NHS	Council should engage with local NHS partners	We engage with the NHS on large housing developments and will do so on the next Local Plan.
NHS	Council should ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments	The next Housing Needs Assessments will look at a range of groups with housing need, including affordable housing needs.
NHS	Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers	This is something the Council will consider in the next Local Plan. It is outside the scope of this SPD.
NHS	Set out specific requirements for key worker housing, including for NHS staff, within focused planning policy documents where there is a demonstrated need	This is something we could consider within the next Local Plan if the evidence is clear there is a specific need. It is outside the scope of this SPD.
Barratt & David Wilson Homes	The fifth bullet after para 5.4 aims to restrict the size of a First Home. This criteria is considered to be overly restrictive as it would impact on people's ability to purchase a suitable property to meet their current or future needs, such as including dedicated space to work from home. This is exacerbated by the fact that the Council will treat an upstairs study as a bedroom if it is over a certain size and therefore, people may need a larger number of bedrooms than the criteria would allow for.	Do not agree this is overly prescriptive. For example, to be eligible for a 4 bedroom home, there needs to be a minimum of 3 occupants. If this was a couple with one child, it would still mean 2 bedrooms are spare for other uses (study). In any case, this is just a local criterion and will only be applied for the first 3 months of marketing.

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Barratt & David Wilson Homes	<p>Para. 70-008-20210524 of the PPG includes examples of the types of eligibility that could be imposed by local authorities. There is no mention in the PPG of restricting the size of home that can be purchased based on the number of occupiers and this is recommended to be removed.</p>	<p>The NPPF defines Affordable Housing is defined as 'housing for sale or rent, for those whose needs are not met by the market'. The additional criterion in relation to number of occupants is an attempt to prioritise larger properties to those who need a larger property. A single person or couple could have their needs met by the market in a smaller home and therefore should not be prioritised for a larger home. In any case, this is just a local criterion and will only be applied for the first 3 months of marketing.</p>
Barratt & David Wilson Homes	<p>Whilst they do not oppose the principle of pepper-potting affordable homes, they have concerns over pepper-potting within flatted schemes that form part of a larger development. RPs usually prefer to take a whole block of flats, rather than managing a mixed-tenure block.</p>	<p>Agree in part. The Council understand that RPs are often reluctant to take homes in a mixed tenure block of flats. However, it is possible to include affordable home ownership homes in flats and also to avoid large blocks of flats that are not entirely market. Amend para 12.9 as follows:</p> <p><i>'The Council <u>will</u> <u>may</u> also require affordable units to be pepper-potted within <u>a block of flats</u> <u>as part of a larger housing scheme</u>, particularly if <u>a large block of flats is proposed</u>. There should be a reasonable dispersal of affordable housing across different blocks of flats and, in some cases, throughout individual blocks.</i></p> <p>In mixed tenure flats careful consideration must be given to how any communal amenity space and parking will be managed and RPs should be involved to ensure that what is being proposed is acceptable to them. In some cases, it may not be feasible to have mixed tenure flats <u>as we understand Registered Providers are reluctant to accept dwellings in such schemes. Therefore, to avoid this situation, housebuilders should avoid large blocks of flats if they intend to include some of the flats to be</u></p>

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		<u>transferred to a registered provider. The Council will accept small blocks of flats as affordable homes as long as there is also a good mix of houses as affordable homes too. If there are a number of block of flats on a large housing development, we would expect some blocks to be for market sale and not all affordable. Exceptions may be made for specialist housing.</u>
Barratt & David Wilson Homes	Acknowledge that paragraph 12.10 recommends liaising with RPs at an early stage, but recommend that the SPD does not seek to prevent the inclusion of fully affordable blocks of flats as part of a larger scheme when this would be the most appropriate mechanism for the delivery of affordable flats.	See above. In large housing schemes, we would recommend avoiding large blocks of flats if they are intended to include affordable homes as RPs may be reluctant to take them on. Either provide smaller blocks or make the blocks available as market homes.
Anchor Hanover	Requiring affordable and social rents to sit below LHA caps is problematic as total rent and service charges often exceed the cap. Capping rents to LHA risks making many schemes financially unviable, limiting the delivery of new affordable homes for older people and exacerbating unmet need.	This requirement was established in the Local Plan (paragraph 8.10) to ensure Local Plan can afford affordable housing. The SPD is reflecting this requirement and cannot change this. This will be reviewed in the next Local Plan.
Anchor Hanover	The SPD requires a local connection criteria to be applied to affordable housing. The SPD does not clarify the criteria for social rented, affordable rented, shared ownership or extra care housing. Local connection criteria for these homes should be included in this SPD. For specialist housing for older people, the criteria should include having close family within the area.	Eligibility for social rented, affordable rented, shared ownership or extra care housing is managed by the relevant RPs/providers. As the Council only assess eligibility for affordable homes for sale (discounted and First Homes) it is proposed to make the following amendment to paragraph 5.1: <u>'Furthermore, as we are seeking to meet local affordable housing need, there will be an additional local connection criterion to be considered eligible for discounted market homes (and First Homes), see below.'</u>
Anchor Hanover	There should be flexibility and clear exceptions to the requirement that all affordable and social rent homes are to be managed through Property Pool Plus.	Agree Replace para 5.2 with:

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	<p>Extra care housing is allocated directly by the local authority, so requiring these homes to be let through Property Pool Plus would create administrative challenges.</p>	<p><u>'We expect Registered Providers to provide nominations rights to the Council and all new homes provided for affordable and social rent to be allocated as per Sefton's Housing Allocations Policy, unless clear justification is provided as to why an alternative approach is necessary or preferable'.</u></p> <p>Add new para after 5.2:</p> <p><u>'Sefton Council expects Registered Providers to provide nominations rights for Extra Care Housing, to be allocated in line with Sefton's Extra Care Allocations Policy, unless clear justification is provided as to why an alternative approach is necessary or preferable.'</u></p>
Anchor Hanover	<p>Support the SPD's flexible approach to affordable housing mix, allowing the most appropriate balance to be determined based on site specifics, local demand, identified need and grant funding availability.</p>	<p>Comment noted and welcomed.</p>
Anchor Hanover	<p>The SPD states that the Council may not accept a large single block of flats being affordable homes. Flexibility in tenure of flatted developments is essential to ensure the viability and successful delivery of affordable older persons' housing as mixed tenure buildings can present market challenges and affect viability. The SPD should not restrict such developments coming forward and should instead include wording that allows appropriate flexibility.</p>	<p>Changes are proposed to this section in response to another comments (see above). We will include at the end that exceptions may be made for specialist housing:</p> <p><u>'The Council will may also require affordable units to be pepper-potted within a block of flats as part of a larger housing scheme, particularly if a large block of flats is proposed. There should be a reasonable dispersal of affordable housing across different blocks of flats and, in some cases, throughout individual blocks.'</u> In mixed tenure flats careful consideration must be given to how any communal amenity space and parking will managed and RPs should be involved to ensure that what is being proposed is acceptable</p>

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		<p>to them. In some cases, it may not be feasible to have mixed tenure flats <u>as we understand Registered Providers are reluctant to accept dwellings in such schemes. Therefore, to avoid this situation, housebuilders should avoid large blocks of flats if they intend to include some of the flats to be transferred to a registered provider. The Council will accept small blocks of flats as affordable homes as long as there is also a good mix of houses as affordable homes too. If there are a number of block of flats on a large housing development, we would expect some blocks to be for market sale and not all affordable. Exceptions may be made for specialist housing.</u></p>