

Topic Paper

Lifetime Design

M4(2) Standard Justification

June 2018



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1 Introduction

- 1.1 This topic paper provides a background on how the requirements for M4(2) Standard housing as stated in WLP8.312 Lifetime Design were established and the justification for including this criteria in the policy.

2 Background

National Planning Policy Framework (NPPF)

- 2.1 To deliver sustainable communities means to support the needs of the current population and any future populations. Paragraph 17 of the NPPF states that local planning authorities should objectively identify and meet the housing needs of an area. It also states that local authorities should take account of and support local strategies to improve health, social and cultural wellbeing for all.
- 2.2 Paragraph 50 of the NPPF states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different people in the community. This includes families, older people and people who are disabled.
- 2.3 Paragraph 50 also states that planning authorities should identify the size, type, tenure, and range of housing that is required in particular locations, reflecting local demand.
- 2.4 Paragraph 69 of the NPPF continues by stating that local planning authorities should create safe and accessible environments for everyone to help build and promote community cohesion. This includes buildings and the areas surrounding them. Local planning authorities will need to demonstrate a clear demand for housing designed for people with specific needs and should plan to meet this demand.

National Planning Practice Guidance (NPPG)

- 2.5 The National Planning Practice Guidance states that the new optional standards have been created to develop a more streamlined system to reduce burdens on house building and bring forward much needed new homes.
- 2.6 The NPPG also states that these standards are related to accessibility, water and internal space. Local planning authorities should gather evidence to determine whether there is a need for additional standards in their area and justify their inclusion in the Local Plan.
- 2.7 Local planning authorities need to consider the impact of implementing these new optional standards as part of their Local Plan viability assessment, which could include taking into account the most recent Impact Assessment issued alongside the Housing Standards Review.

- 2.8 If Local planning authorities decide to adopt the optional standards on accessibility, they should clearly state the proportion of housing that needs to meet the requirements. Local planning authorities should also account for site specific factors such as vulnerability to flooding and topography and plan for housing suitable to the area.

Suffolk Health and Housing Needs Assessment (2018)

- 2.9 The Suffolk Health and Housing Needs Assessment, published by the Suffolk Health and Wellbeing Board in 2018, identified housing as a key area for improving public health. The aim of this assessment was to provide a shared understanding to those working in the Suffolk System so that a workable strategy can be produced to deliver more and improved homes.
- 2.10 One of the conclusions of the assessment was that the population of Suffolk aged over 65 will increase by 54% between 2015 and 2037. It was also stated that older people spend between 70-90% of their time in their home. This, combined with the current housing stock, will mean that there will be a greater proportion of the population considered to be at risk of living in unsuitable homes. This will lead to increased costs for the NHS.
- 2.12 The assessment also set out the benefits of M4(2) homes as a successor to Lifetime Homes including indirect benefits such as improvements to mental health and wellbeing. Direct benefits included reduced incidences of falls on level surfaces and stairs.

Existing Local Plan Policies

DM17 – Housing Type and Mix

- 2.13 Policy DM17 of the existing Local Development Framework for Waveney states that a proportion of all new housing shall be built to 'Lifetime Homes' standard as set out in the Code for Sustainable Homes, however no percentage is given for this requirement.

Optional Housing Technical Standards for Accessibility

- 2.14 The optional technical standards for housing are set out in Document M of the Building Regulations 2010 and were first introduced in a written ministerial statement from March 2015 which set out the policy of how these standards would be used in planning and decision making. The standards included regulations that exceeded the minimum standards in relation to water and accessibility as well as a new optional nationally described space standard. Local planning authorities are required to gather evidence to establish whether there is a need to introduce the additional standards in their area.
- 2.15 The optional technical standards for accessibility cover a wide range of factors split into two categories: accessible and adaptable dwellings (M4(2)) and wheelchair user dwellings (M4(3)). These are then divided again between factors influencing the approach to the dwelling and the private entrances and spaces within the dwelling.

- 2.16 Accessible and adaptable dwellings are dwellings where there is reasonable provision for most people to gain access to and use the dwelling and its facilities, and includes meeting differing needs, including some older people and wheelchair users. They also allow the adaptation of the dwelling to meet these needs over time. Wheelchair user dwellings follow most of the same principles except it meets the needs of a wheelchair user or at least only requires simple adaptation to do so.
- 2.17 The factors included in the approach to the dwelling include approach routes, car parking and drop-off, communal entrances and communal lifts and stairs. Private entrances and spaces within the dwelling include circulation areas, internal doorways, habitable rooms, sanitary facilities and controls for services.

3 Evidence Base

Strategic Housing Market Assessment (2017)

- 3.1 The Strategic Housing Market Assessment (SHMA) analyses the housing market geography for Waveney and produces an Objectively Assessed Need for the District that the Local Plan must make appropriate accommodations for. Part of this assessment involves projecting future demographic changes to establish what types of housing need to be in place to provide a good housing mix for the District.
- 3.2 The SHMA for the new Local Plan has projected that the population of Waveney aged over 65 is set to increase by 40.8% between 2014 and 2036.
- 3.3 The SHMA also analyses data from the Projecting Older People Population Information System (POPPI). This system concluded that the proportion of older persons aged 65 and over will increase from 36.5% in 2015 to 38.4% in 2030. The number of people aged 65 or over with a long-term limiting illness that limits them a lot is expected to increase by 37%. This is compared with only a 0.1% increase in those aged between 18-64 with a serious physical disability. The numbers of people aged between 18 and 64 with a common mental disorder is predicted to decrease by 4.3% and those with a moderate or severe learning disability are predicted to increase by 1.4%.
- 3.4 The SHMA also states that 22.3% of the existing resident population in Waveney suffers from a long-term health problem or disability, both physical and psychological. The increase in the number of people at or over 65 and the number of people with physical disabilities means that more specialist and adapted accommodation will be needed to meet their needs.
- 3.5 The SHMA also looked to project the number of future residents who may require support and assistance to remain in their own homes. This was done by looking at the number of Disabled Facility Grants that had been completed between 2011/12 and 2015/16. This analysis showed that overall the requirement for this grant had increased over the period, with the peak year being 2013/14.

Whole Plan Viability Assessment (2018)

- 3.6 The Whole Plan Viability Assessment analyse the impact of different Local Plan policies on development viability. The assessment tested a range of affordable housing levels, infrastructure contribution levels and levels of M4(2) dwellings for different site sizes and locations.
- 3.7 The assessment assumed a cost of £521 per dwelling for M4(2) dwellings. The starting point for the assessment was the 5% of dwellings per site requirement indicated in Policy WLP8.1 of the First Draft Local Plan. However, the assessment also tested a range between 40% and 80% of dwellings on-site. The results can be seen in Appendix 5. The effect on viability of an increase in proportion from 5% to 40% is marginal. For example, page 77-78 of Appendix 5 shows the viability results for a 100 unit scheme in the lower mid value area (outer Lowestoft). The first table shows that with an affordable housing level of 20% and zero CIL and 5% M4(2), the viability buffer is £913,427. With 40% M4(2) (last table on page 78) this buffer falls to £894,517. The cost of the 40% M4(2) proportion on this 100 unit scheme is less than 0.2% of total build costs.

2011 Census Data

- 3.8 The 2011 Census can be used to show a snapshot of the proportion of the population of Waveney who are disabled and therefore may require specialist housing, including accessible and adaptable dwellings, in order to live independently.
- 3.9 The 2011 Census showed that 61.4% of households did not have a disabled resident. 31.5% of households had 1 resident with a disability and 8.6% of households had 2 or more residents with a disability. This means a total of 40.1% of households in 2011 had at least 1 disabled resident.

DCLG Household Projections

- 3.10 The household projection provided by the Department for Communities and Local Government can be used to estimate the changes in the number of households in Waveney that will be 65 and over in 2036.
- 3.11 The projections, using a baseline of 2016, show that there will be a 34.8% increase in the number of households aged 65 and over between 2016 and 2036. Within this group, the largest increase will be within the 85 and over category which will increase by 108.2%.

Personal Independence Payments

- 3.12 Waveney currently has 5,615 people cleared for Personal Independence Payments, the new disability benefit replacing the Disability Living Allowance. This number makes up 92% of the total registrations for the payment. Most claims are from people suffering from psychiatric disorders, with the second and third most common being general and regional musculoskeletal disease.
- 3.13 Waveney has an existing population of 115,254. Therefore Personal Independence Payment recipients currently make up 4.9% of the Districts population. However, it should be stressed that

the number of people claiming Personal Independence Payments is increasing across the Country, meaning it is likely to do the same in Waveney. Also it should be noted that there may be some people who qualify for the payments that are currently not claiming them, therefore it is likely that the number of claimants is not fully representative of the actual disabled population. This can be seen by comparing this data to the data from the 2011 Census which shows that there is a much higher percentage of the population who are considered disabled compared to the percentage who claim Personal Independence Payments.

4 Evolution of the Policy

Options for the New Waveney Local Plan Consultation (April 2016)

- 4.1 One question was asked during the consultation relating to the optional technical standards for housing.

Question 80: Should we adopt additional optional technical standards in respect of water, access and national space standards for new residential development?

Responses to Question 80

- 4.2 Responses that related directly to accessibility standards were mixed. Carlton Colville Town Council and Southwold Town Council supported the introduction of all three standards including accessibility. Rentplus stated that the Council should assess the viability and need for the standards relating to accessibility as to not affect the deliverability of new housing. St. Johns Hall Farm and one member of the public stated that the standards should not be adopted unless there is a very good reason for them to be adopted. Badger Building and Lawson Planning Partnership did not support the adoption of any of the standards as local circumstances do not justify their adoption and their adoption would have a negative impact on viability.

Identification of Preferred Option for First Draft Local Plan

- 4.3 Two options were identified when preparing the First Draft Local Plan which were subject to sustainability appraisal. These options reflected the answers submitted in response to question 80 of the 'Options for the new Waveney Local Plan' consultation. It was suggested that the following options were taken forward for consideration in the First Draft Local Plan specifically relating to accessibility:
- Inclusion of the requirement for some sites to provide a proportion of M4(2) Accessible and Adaptable Standard homes within the Housing Mix policy (Policy WLP8.1 of the First Draft Local Plan).
 - No policy requirement

- 4.4 The preferred option was to include a requirement. This was set at 5% of dwellings on sites with a capacity of 20 dwellings or more. It was considered that this option will ensure the delivery of accessible dwellings across a range of sites allocated in the Local Plan. In the absence of specific viability evidence at the time the proportion of dwellings was limited to 5%. The use of a minimum capacity of 20 dwellings was to ensure that these dwellings are only delivered on sites which were large enough to give developers greater flexibility on which dwellings to build to the standard. The additional building costs for dwellings that meet the M4(3) Requirement are known to be significantly higher than the costs to meet the M4(2) Requirement therefore a minimum proportion for this type of dwelling was not included to ensure there was no impact on viability.
- 4.5 The option of having no standard was not preferred as this option would leave the Council with no control over what types of dwellings are developed on permitted sites. This would have a negative effect on meeting the housing needs of all sections of the community.

Responses to First Draft Local Plan consultation

- 4.6 The comments received during the First Draft Local Plan consultation relating specifically to the optional technical standards for accessibility were mixed. Reydon Parish Council, the Southwold and Reydon Society, Benacre Estates Company and Bungay Neighbourhood Development Plan Steering Group all supported the inclusion of the standards. Halesworth and Blythe Valley Partnership, South Norfolk District Council and members of the public broadly supported the whole of policy WLP8.1. Gladman Developments Ltd and some members of the public stated that the mix of housing on a site should be left to a case by case basis in response to the market and local circumstances. Somerleyton Estate added that Neighbourhood Plans should be able to set out different housing mixes to reflect local circumstances. Gladman Developments Ltd and the Home Builders Federation stated that there was insufficient evidence to justify the inclusion of the standards as required by the National Planning Practice Guidance. Badger Building stated that developing a 2 bedroom property to meet these standards would involve increasing the floorspace of the property to that of a 3 bedroom property with no subsequent increase in sale price; however they added that the threshold for sites with a capacity of 20 dwellings or more is sensible. Suffolk County Council requested discussions on the evidence of need and whether it would be possible to increase the proportion.

Final Draft Local Plan

- 4.7 Following the First Draft Local Plan consultation two new Design policies were included in the Final Draft Local Plan in order to provide more detail on what will be considered good design for new developments, Design of Open Spaces (WLP8.30) and Lifetime Design (WLP8.31). The requirement for M4(2) Standards outlined above was incorporated into WLP8.31 as it was considered to form part of meeting the requirements for the changing population of the District over the plan period.
- 4.8 Reflecting the findings of the Whole Plan Viability Assessment, the proportion requirement was increased to 40% and the threshold was set to the major development threshold of 10 dwellings to make it consistent with some of the other policies in the Local Plan. It is considered that the 40%

requirement on sites of 10 or more dwellings still provides developers with some flexibility over which dwellings to design to the M4(2) standard. Whilst the Whole Plan Viability Assessment and the evidence of need summarised above would suggest that a higher proportion could be justified, it is considered that a higher proportion would cause practicality issues for developers and therefore increase burdens on developers. This would particularly be the case for small sites as they would only be able to accommodate smaller numbers of dwellings, which would mean there would be less flexibility on which homes to design to the standard. When considered together with the affordable housing requirements and housing mix requirements outlined elsewhere in the Local Plan, a higher proportion of M4(2) could make establishing a viable mix of housing more challenging. Therefore the 40% requirement is considered a reasonable balance between need, practicality and viability.