

Home Builders Federation

ID: 19OTH0036

Matter 11

EPHING FOREST LOCAL PLAN EXAMINATION

MATTER 11: Housing

Issue 1: Will Policy H1 be effective in securing an appropriate mix of housing?

1. Is Part A sufficiently specific in relation to the mix of housing required such that a potential developer would know how to react to the policy? Should it reflect up to date evidence on the actual mix required?

We would expect an indication within the supporting text as to the broad mix of housing the Council is seeking to achieve within developments. This would provide an indication to the development industry as to what a policy compliant scheme would look like and allow for more efficient decision making where the developments meet this mix. However, we welcome the flexibility of this policy that the mix will also be defined by the nature of the site and types of housing within that area.

We are also concerned that the policy as written will apply to all development. We would suggest that consideration of the mix of the type and size housing should only be applied to major development. Requiring smaller development to consider delivering a range of housing types and size is not an effective policy and adds to the burden on smaller house builders a sector that the Government is seeking to support.

2. Does the policy, and the Plan generally, do enough to support the specific needs of older people?

No comment

3. Is Part D, which simply cross-refers to Policy H2, necessary? Could it be deleted for clarity/simplicity?

Part D is not necessary and should be deleted.

4. Does the policy require all new homes to meet the Optional Technical Standards M4(2) and/or M4(3) of the Building Regulations for accessible & adaptable dwellings and wheelchair user dwellings respectively? If so, is the need for these standards justified by evidence such as that suggested by the PPG? Should the policy allow for consideration of site-specific factors which might render such standards unachievable or unviable?



The Council's policy is unclear as to its intentions with regard to accessible homes. If the Council is seeking to apply part M4(2) of the building regulations it must state this and provide the necessary evidence to support their application to all new homes. However, on the basis of the Council's evidence we do not consider such a policy to be justified at present. As we set out in our representations that whilst there is undoubtedly an ageing population within the Borough the Council has not seemingly presented any evidence as to the number of older people who will require their home to be adapted in future.

Evidence from the English Home Survey which examined the need for adaptations in 2014/15¹ noted that 9% of all households in England had one or more people with a long-term limiting disability that required adaptations to their home and that this had not changed since 2011-12. The survey also found that in 2014-15, 81% of households that required adaptations in their home, due to their long-term limiting disability, felt their current home was suitable for their needs. The evidence also indicates that those over 65 are more likely to consider their home suitable for their needs. So, whilst there is an ageing population there may not be a consequential increase in the need for adaptations or more adaptable homes. For many older people, a new home built to the mandatory M4(1) standard will offer sufficient accessibility for the rest of their lives and as such to require all new homes to comply with Part M4(2) is disproportionate to the likely need within the plan period.

The evidence indicates that for the majority of people over 65 homes built to the mandatory standard (M4(1)) will be sufficient to meet their needs throughout their lives. According to Part M of the Building Regulations meeting M4(1) will ensure reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey. As such these standards are likely to be suitable for the significant majority of people as they get older. This level of accessibility is considered by Government to be sufficient for the majority of people regardless of their age and which is one of the reasons why the Government required this standard to be applied on the basis of needs rather than introducing it as a mandatory element of the building regulations.

As such the evidence indicates that some but not all homes should be built to Part M4(2). This would provide sufficient scope to meet the need for such homes whilst also ensuring development design and mix is not compromised by the demand for all homes to be built to the part M4(2).

6. Will the policy be effective in providing opportunities for self-build/custom housebuilding? Having regard to the duties set out in the Self-build and Custom Housebuilding Act 2015, should the Plan set out how many such homes it aims to deliver, and should it be stronger in terms of how the necessary land will be secured?

The policy is in accordance with national policy which establishes that Council's should engage with land owners to identify appropriate sites for self and custom build housing and have policies that are supportive of such housing.

Mark Behrendt MRTPI
Planning Manager – Local Plans SE and E

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf