

Matter 11: Issue: Policy H1F

The Programme Officer has kindly allowed/advised that the issue of Policy H1F will be considered at the Examination Hearing under Matter 11XX Issue XX. This appears the only way that EFDC will be challenged openly on Policy H1F, which has major deficiencies.

Previously, I have resisted the temptation to submit Statements in addition to Regulation 19 objections. Having attended hearings, and read statements by others appearing, it seems appropriate to add this statement.

While I am concerned about Policy H1F, its lack of logic, and how it will operate; **I do not have any property interest in a site or bungalow in the District.** However, I am an individual living in the District (and a retired RTPI Member, also a former long-time Forward Planning Manager at EFDC).

Statement

H1F states: “The loss of bungalows and specialist accommodation will be resisted.”.

This policy is unclear what “resisted” will mean in practice: does it mean demolition will be refused, or not? There is nothing in the policy text, nor the accompanying text (3.1-3.8) to explain how this might operate. So people wishing to do the ‘right thing’ may be deterred from demolishing a bungalow, whereas a ‘hard-nosed’ developer would be likely to apply for redevelopment of a bungalow site. These two approaches might take place sequentially for the same property: by the first person selling to someone who turns out to be the second type. This is unfair, and helps bring planning into disrepute if the bungalow is subsequently redeveloped for a house or two, or flats.

If the policy meant to say that demolition will be refused then, apart from external appearance, this would appear to give bungalows more protection from demolition than listed buildings!

The supposed policy justification only says that the needs of people with accessibility needs and older people “**can**” be supported by bungalows and that bungalows have “**potential**”

ease of adaptation. Not that they will. The only thing of which we can be certain is that bungalows will be easier for anyone, no matter of age, who has difficulty with stairs.

Many bungalows were built, and for which there was demand, before stair-lifts (and even now domestic lifts) became widely available; making previously difficult to access upper floors accessible: useful to older people who wish to remain in their own house, in which they may have lived for many years.

The loss of specialist accommodation, i.e. specially built, is a sensible plan aim and paragraph 3.6 rightly deals with this: and separately from bungalows, unlike Policy H1F which combined the two. Specialist accommodation is very different to the position of bungalows; which may well have been built (largely in the 1930s and 1960s) before current accessibility considerations arose, such as the “Category 2: Accessible and Adaptable Homes standards” quoted in Plan paragraph 3.4. While by definition they will not have stairs, there is no certainty at all that the internal arrangement will allow easy access e.g. for someone using (or soon requiring) a wheelchair. I know of such a 1930s building with accommodation on only one floor elsewhere, which would require removal of several internal walls, widening of doorways, and provision of ramps (internal and external) to make it accessible.

But the policy doesn’t address the potential -or not- for adapting a bungalow: instead assuming that retaining bungalows is a good thing.

Purpose built replacement accommodation, whether new bungalows, flats or houses with lifts/stair-lifts are not just likely to be built to better accessibility standards: they are also likely to be warmer and with energy/resource saving features which should make life better for older people, many of whom will rely on just pension income; and elderly people feel the cold more.

There are other issues with deterring or preventing the loss of bungalows.

Bungalows, especially those built years ago in the middle of a plot, don’t make best use of urban land, nor non-greenbelt land.

The Plan, e.g. paragraphs 3.80 and 3.92 (third bullet) quotes the need to make best/better use of urban land; in that case achieved by local parking standards. However this aim is ignored in policy for existing bungalows.

The policy as it stands, and depending on its exact meaning (as above) would prevent the beneficial redevelopment e.g. of one bungalow in the middle of its plot with two bungalows: to modern standards and making better use of land.

The bungalow retention policy in H1F would interfere with the operation of the market, and the need for sustainability, without a convincing planning reason: compared to what the market might provide; and to what other policy alternatives could be adopted, as below.

Flats, including private garden space, lifts, built to modern accessibility standards including full accessibility requirements; fits with the aim of housing policy set out in paras. 3.2 & 3.4.

Flats may be viewed as “multi-story bungalows”. As well as providing purpose built and accessible accommodation with lifts, they can greatly reduce Green Belt take in the District; accommodating twice, thrice, or more the number of homes on a given surface area of land. Managed maintenance of external fabric can relieve this burden from amateur and/or older inhabitants.

Often in the past, flats haven’t had private gardens; with green space around them being communally maintained. However there have been sites where ground and upper floor flats have private rear, and sometimes front, gardens: e.g. house to flat conversions, railway workers flats in Leyton which look like a terraced houses. Another example is of external improvements to 3 storey 1950s council flats some years ago in Longbenton, Newcastle-upon-Tyne, where some areas of soulless open space was fenced-off to provide rear private gardens. Upper flats commonly have balconies, and there is a new trend to provide larger terrace areas above ground.

So planning policy could usefully encourage/require flats, especially ground floor flats, to have private garden space in addition to communally maintained grounds: to make flats more attractive to older people who like a garden. And to encourage terrace areas, or larger balconies, for upper floors.

Rather than trying to retain existing bungalows, which may in fact not meet the plan’s aim to provide accessible accommodation, policy would be more effective and sound if it required a proportion of purpose built bungalows on new large sites, whether Plan allocations or not. This would also fit with the objective of housing policy set out in paras. 3.2 & 3.4 which talk about “new homes”, “mixed and balances communities”, and “accessibility needs”.

Bungalows can be incorporated into new sites, including high density sites, notwithstanding the point about flats –and flats with private external space- above being a helpful alternative.

For example, a high density development of a site close to the greenbelt in Whitley Bay, Tyne & Wear (Chathill and Elford Closes) comprised 2 and 3 storey terraced houses and flats with bungalows at the ends of the non-straight terraces (terraces turn at right angles).

Parents with disabled children can often extend a house to provide appropriate accommodation, usually at ground floor level. Families with elderly parents/grandparents may seek/build a 'granny annex'. Both don't rely on bungalows: the space in which may be too limited, particularly for an extended family.

Plan paragraph 3.7 says the "Council will work with landowners and developers to deliver... self-build and custom housebuilding". But as anyone who has followed the plot-finding websites for self-builders (Plotfinder and PlotSearch) will know, many opportunities -which aren't vacant plots or Permitted Development barn conversions- will be (often dilapidated) bungalows. Self-builders may be seeking an opportunity to provide for accessible and 'lifetime' homes which they can't easily find elsewhere (including perhaps for disabled family members, or their own old age).

Plan paragraph 3.5 notes Authority Monitoring Report information on the "gradual erosion of the District's existing stock of bungalows". This does not mean that whatever buildings replace these are less accessible and therefore poorer than existing bungalows: they might easily be more accessible. Equally, with EFDC's "approach... that all new homes should be built to Category 2: Accessible and Adaptable Homes standards" quoted in Plan paragraph 3.4; any further bungalows lost should be redeveloped to better accessibility standards.

So an erroneous attempt to keep existing bungalows prevents/deters:

- New build bungalows as a better accessible alternative;
- Better use of urban and non-Green Belt land;
- Flats with private garden space as an alternative; and
- Self-builders redeveloping bungalows;

Soundness The policy isn't Justified (not the most appropriate strategy given alternatives set out above) nor even an appropriate strategy (in latest NPPF terms). It isn't consistent with sustainable development and therefore national policy; nor an appropriate interference of planning in the market.

Modification/s sought:

- Removal of "bungalows" in Policy H1F;
- If not removed, then clarification of "resisted" and under what circumstances bungalows should not be lost (e.g. where they meet the accessibility standards set out in the Plan, i.e. para. 3.4;
- Addition of encouragement/requirement for private external space in flats developments; and
- Addition of new build bungalows requirement for large sites.