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19/05/2021

Dear Sir / Madam,

### **HAMBLETON LOCAL PLAN EXAMINATION: POST HEARING CONSULTATIONS**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Hambleton Local Plan Examination Post Hearing consultations.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

#### **Note relating to policy HG 2 requirement for optional accessibility standards**

3. Policy HG2<sup>1</sup> states that *'a proposal for housing development will be supported where . . . all homes meet building regulation requirement M4(2) accessible and adaptable dwellings (or replacement standards), across all tenures, and within a large scale development, defined in the Glossary, a proportion of homes are further enhanced to meet building regulation requirement M4(3) wheelchair adaptable dwellings (or replacement standards), having regard to identified need'*.
4. The Note on Accessible Housing is intended to identify the need for accessible housing and to inform any changes to the policy and the justification text. Section 2 of the note is intended to provide the evidence to support the need for the policy. It identifies that the PPG<sup>2</sup> set out the evidence that a local planning authority (LPA) can considered in determining the need for the optional standards in relation to accessibility and adaptability standards, including the likely future need for housing for older and disabled people (including wheelchair user dwellings); the size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes); the accessibility and adaptability of existing housing stock; how needs vary across different housing tenures; and the overall impact on viability. However, the note does not then go on to address each of the potential considerations.

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<sup>1</sup> Publication Draft (July 2019)

<sup>2</sup> PPG ID: 56-007-20150327



5. The Note makes it clear that detailed information in relation to the housing stock in Hambleton is not available, so it goes on to consider national information provided by the English Housing Survey (EHS) from 2016. The HBF does not consider that it is appropriate to consider national data, if the national information on the accessibility of dwellings had been sufficient to require the introduction of the M4(2) or M4(3) standards the Government would have introduced those instead of the baseline requirement of M4(1). Instead, the Government set optional standards which require LPAs to gather evidence to determine whether there is a need for additional standards in their area, and to justify setting appropriate policies in their Local Plans. It is also noted that as the requirement for homes to meet the M4(1) visitable dwellings was only introduced in 2015, meaning that all newer homes will now be visitable, and that this information would not have fed into the information utilised in the EHS.
6. The note goes on to suggest that specialist housing should not and can not meet all of the housing needs of older people. It does not provide any evidence to suggest what proportion of needs may be met by specialist accommodation or in relation to what numbers of people in Hambleton may wish to use specialist accommodation or may wish to stay in their own homes. It also does not provide any information in relation to how many older people would consider moving into a new home that was built to M4(2) or M4(3) standards.
7. The note goes on to reiterate much of the information from the SHMA in relation to older people. The note assumes that M4(2) homes would cater to any long-term health problems associated with ageing. However, there is no evidence to support this assumption, or that faced with a long-term health problem that an older person would choose to stay in their own home.
8. The note then goes on to consider the Housing Register and any self-identified disabilities, it suggests that approximately 9% of the current applicants have a mobility issue, and that nearly 10% of applicants identify as needing some form of adaptation. It does not consider how many of the existing homes available are already adapted to meet these needs, or how many could be cost effectively adapted to meet these needs.
9. Again, the report highlights that information in relation to the need for wheelchair users in Hambleton is difficult to obtain, and again the note seeks to use national data from the EHS. Table 7 of the note clearly shows that the proportion of people where day to day activities are limited a lot is lower in Hambleton than the English average, which suggests that the local need for adjustment is likely to be lower than the national requirements. The EHS suggests that a total of 3.5% of all households contain a wheelchair user. This suggests that the requirement for wheelchair accessible homes is likely to be significantly lower than that proposed by Hambleton in their justification text. It is not considered that it is appropriate to expect the remaining new homes to provide for the whole identified need for M4(3) homes. It is not known whether the remaining homes would be provided in locations that would be appropriate, suitable or wanted by those needing M4(3) homes, or whether they would provide the appropriate size of

homes required, as no evidence has been provided in relation to these elements of need.

10. The conclusion of this section of the note suggests that to meet the identified needs the Council should seek 14% of all new market homes to be M4(3) and 36% of affordable homes. It also suggests that market homes should be built to M4(3a) and that affordable homes should be built to M4(3b). The HBF does not consider that this is appropriate and does not consider that the evidence provided is sufficient to support the existing policy either.
11. The Viability Assessment has assumed that all dwellings will comply with M4(2) and that for development of 200 dwellings or more that 9% of market homes and 30% of affordable homes will meet the M4(3a) standards. The Viability Assessment assumes a cost of £1,110 per house and £750 per apartment for M4(2) homes and £5,500 per house for the M4(3a) standard. The Government's consultation on Raising Accessibility Standards for New Homes (Sept 2020) estimates the additional cost per new dwellings is approximately £1,400, this is quite a significant difference in cost per dwelling. It is noted that the EC Harris Report (2014) looking into the costs of the optional housing standards suggested a cost of between £7,607 for an apartment and £10,568 for a detached 4-bed house to meet the M4(3a) standard and £7,764 for an apartment and £23,052 for a detached 4-bed house, these figures would now need to be adjusted for inflation. However, these figures are significantly above the costs used in the viability assessment. It is considered that the use of these revised figures, the potential proposal from the Council to include the need for affordable homes built to M4(3b) standard and the potential to encourage the provision of M4(3) on sites of less than 200 dwellings could have significant effects on the viability of development. The HBF considers that the viability evidence in the Viability Assessment does not support the need to provide the evidence to meet the M4(2) and M4(3) standards, and certainly does not support any further increases in the requirements.
12. The note suggestions that homes built to the M4(2) or M4(3) standards may command a premium and therefore a higher sales value. The Council do not provide any evidence to support this assumption. The HBF suggests that if the Council wanted to know if there was any evidence to support this assumption it would have been beneficial to speak to the homebuilding industry. However, it is assumed that this may have given them an answer they did not want.
13. The HBF continues to consider that the Council does not have the appropriate evidence to support the introduction of the optional standards, M4(2) and M4(3), the HBF continues to consider that this requirement should be deleted.
14. However, if the policy is to be retained if the Council does provide the appropriate evidence, including viability, and this policy is to be included, then the HBF continues to recommend that the policy should:
  - take into account site specific factors such as vulnerability to flooding, site topography and other circumstances which may make the site less suitable for M4(2) and M4(3) compliant dwellings as set out in PPG;

- ensure that if step-free access is not viable that M4(2) and M4(3) should not be applied; and
- ensure an appropriate transitional period is included.

### **Future Engagement**

15. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
16. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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