

## Home Builders Federation

### Matter 10

## NEW FOREST DISTRICT LOCAL PLAN EXAMINATION

### Matter 10: Other Policies

Issue- Whether policies relating to transport and travel, community services, infrastructure and facilities, safe and healthy communities, developer contributions, development standards and monitoring are justified, effective and consistent with national policy

Relevant Policies: Policy 7, Policy 8, Policy 29, Policy 31, Policy 34, Policy 35 and Policy 36

10.7 How do the accessibility standards for new homes set out in Policy 35 compare with those required by Building Regulations? What is the evidence that justifies the need for the particular standards set out in part i of the policy? How has the effect of these standards on viability been taken into account?

Whilst we recognise that there may be a need to provide some homes to higher accessibility standards there is insufficient evidence presented to indicate that all new homes will be required to be built to part M4(2) of the building regulations. When considering the approach to be taken to accessible homes the Government recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made 'optional' with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability.

PPG (ID 56-07) identifies the type of evidence required to introduce a policy for accessible and adaptable homes, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for NFDC which justifies the inclusion of optional higher standards for accessible and adaptable homes. Evidence of an ageing population or those with a disability as set out in paragraph 9.11 of the Local Plan and section 3 of topic paper SD16: Housing Mix does not in itself justify the requirements of this policy. Consideration needs to be given as to the numbers of people in NFDC who will need an adaptable or accessible home in future.



Just because a person is over 75 does not mean they will require their home to be adapted in future and even less for those who live in a recently constructed house. It must be remembered that all new homes will be built to part M4(1). 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.

If the Government had considered that the ageing population seen across the Country to be sufficient to require all homes accessible & adaptable homes standards, then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The optional higher M4(2) standard should only be introduced on a “need to have” rather than a “nice to have” basis.

No consideration appears to have been given to the type and tenure of dwelling that is likely to need adaptation. We may have expected to see information in relation to the proportion of people that may need an accessible home from the social rented tenure for example, or in relation to the how the need is consistent across the Borough rather than in particular locations, whether there were any sizes or types of homes that were of particular need for example will it be single people, older couples or will it be family homes with facilities for older or disabled members. No evidence is provided in relation to the accessibility and adaptability of the existing stock nor consideration given to the fact that the majority of those who will need adaptations already live within NFDC. The increase in households containing an older person is principally the result of an ageing population rather than through migration.

Providing for accessibility requirements also needs to be balanced against other requirements from building standards, the wider aspirations of consumers for their homes (including affordability) and the other contributions which are sought from new housing towards community benefit. Given the high proportion of affordable housing required within the Borough, and poor delivery against similar targets in the past the council will need to consider the priorities for housing delivery through this plan.

The policy does not address all the requirements set out in the PPG, and as such could not be considered to be effective. The PPG is clear that policies should also take into account site specific factors such as vulnerability to flooding, site topography and other site-specific circumstances which may make certain sites less suitable for M4(2) or M4(3) development. This is not evident within the policy as presently drafted.

The HBF does not consider that there is sufficient evidence to require all new homes be built to part M4(2) or higher. If the Council wish to include such a policy, it is incumbent on it to assess the number of new homes that are likely to be occupied by someone who will need their home adapted.

10.8 What is the evidence in terms of the need for the higher water use efficiency standard set out in part ii of the policy? How has the effect of this standard on viability been taken into account?

If the Council are to include this optional standard, they will need to ensure that there is clear local need as set out in paragraph 57-015 of PPG. If no such evidence is presented the Council should not adopt this policy.

10.9 In overall terms is Policy 35 effective, justified and consistent with national policy?

As set out above we consider there to be elements of policy 35 that have not been justified and will need to be amended in order for the policy to be considered sound.

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