

Broads Local Plan Examination

Suffolk County Council Statement on Matter 10 – Other environment policies

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1. Introduction

1.1 This statement concerns Suffolk County Council's comments on inclusive, accessible and adaptable design, as relevant to the questions identified under Matter 10. These relate to questions g) and h).

2. Question g)

Are criteria h) and k) in Policy PUBDM42 on adaptability and accessibility robustly based in line with national guidance and on optional technical standards? Is there clear evidence on local need, and has their impact on viability been assessed?

2.1 Criteria h) and k) of Policy PUBDM42 set out the following requirements:

*h) **Adaptability:** Developments shall be capable of adapting to changing circumstances, in terms of occupiers, use and climate change (including changes in water level). In particular, dwelling houses should be able to adapt to changing family circumstances or ageing of the occupier(s) in accordance with Lifetime Homes' standards, and commercial premises should be able to respond to changes in industry or the economic base.*

[...]

*k) **Accessibility:** Applicants are required to consider if it is appropriate for their proposed dwelling/some of the dwellings to be built so they are accessible and adaptable and meet Building Regulation standard M4(2) and M4(3). If applicants do not consider it appropriate, they need to justify this. For developments of more than 20 dwellings, 5% will be built to meet the Building Regulation Standard (M4(2).*

2.2 As set out by the Broads Authority in a statement to the examination, the planning authority proposes to amend the policy to:

- (i) Delete the reference to the Lifetime Homes standard and
- (ii) Correct a drafting error, such that the policy requires that 20% of dwellings meet the M4(2) standard on sites of 5 dwellings or more.

2.3 The County Council welcomes the amendment to criteria h), making the plan consistent with Government policy that optional housing standards should be integrated into and applied through local planning policy. This is consistent with

a comment made by Suffolk County Council at the Regulation 19 consultation stage.

- 2.4 The County Council also welcomes the increase in the percentage requirement for M4(2) housing from 5% to 20%. There is a clear need for additional accessible/adaptable homes, which would justify increasing the percentage further.

Local Policy

- 2.5 The NPPF, in paragraph 17, states that the planning system should ‘take account of and support local strategies to improve health’. The Suffolk Health and Wellbeing Strategy, endorsed by local NHS organisations, Suffolk Police and various local voluntary organisations, as well as Suffolk local authorities, includes the following objectives:

- Improving independent life for people with physical and learning disabilities.
- Older people in Suffolk have a good quality of life.

- 2.6 The provision of M4(2) homes will help to achieve these objectives. Homes built to this higher standard also support the County Council (as lead authority for public health and adult social care) in its efforts to help people retain their independence and remain in their own homes.

- 2.7 The Suffolk Health and Wellbeing Board has identified housing as a key focus area for 2018/19. Its report - Suffolk Housing and Health Needs Assessment (March 2018)¹ – sets out the benefits of M4(2) homes, as the successor standard to Lifetime Homes (page 29).

A paper by the Department of Communities and Development in 2012, assessed the direct and indirect benefits of Lifetime Homes. The report suggested that the indirect health benefits of Lifetime Homes included improved mental health and wellbeing. For example, having neighbourhoods that are formed of Lifetime Homes may create closer communities, therefore tackling social isolation and promoting independent living. Potential direct health benefits of Lifetime Homes were calculated through a model based on the English House Condition Survey and the Housing Health and Safety Rating Scheme. It predicted that reductions in falls on level surfaces, falls on stairs and intruders in the home would be the top three benefits of residents in Lifetime Homes. The modelling predicted a 20% reduced risk of falling on levels surfaces and 10% reduced risk of falling on stairs with lifetime home adaptations.

- 2.8 Similar benefits can be expected from M4(2) homes.

¹ See: https://www.healthysuffolk.org.uk/uploads/Suffolk_Housing_and_Health_Final_Mar18HWP.pdf

Evidence

1.1 Evidence submitted by The Broads Authority shows that:

- There is a waiting list of people who need to move on medical grounds.
- There is demand for accessible housing within the affordable housing sector, which also provides an indication of need within the private housing market.
- The 2011 Census shows that, based on a self rated assessment, a greater proportion of people in the Broads Authority area had their day to day activities limited due to a health condition than the national average. Furthermore, proportionately fewer people reported themselves as being in very good or good health than the national average.
- The Broads Authority area has a population that is older than the national average, and that the population is estimated to become older during the course of the plan period.

1.2 This shows that there is significant demand for housing which can meet the needs of occupants with changing mobility. Additional evidence is set out below.

1.3 The 'Projecting Older People Population Information System', operated by Oxford Brookes University and the Institute of Public Care, provides a useful indicator of the increasing prevalence of reduced mobility amongst the older population. The following table sets out a projection of the number of people aged 65 and over, per District, who are expected to be unable to manage at least one mobility activity on their own, projected to 2035. Activities include: going out of doors and walking down the road; getting up and down stairs; getting around the house on the level; getting to the toilet; getting in and out of bed.

1.4 This is based on ONS population projections and prevalence rates taken from the 'Living in Britain Survey (2001)'. It suggests a significant increase in the number of older people who could benefit from adaptable homes.

Total population aged 65 and over unable to manage at least one activity on their own. Source: POPPI v10.1 June 2018, www.poppi.org.uk accessed 13/06/18

	2017	2020	2025	2030	2035	% increase, 2017-2035
Broadland	6,085	6,545	7,369	8,326	9,455	55.4%
Great Yarmouth	4,276	4,551	5,028	5,752	6,498	52.0%
North Norfolk	6,264	6,703	7,521	8,485	9,473	51.2%
Norwich	4,027	4,109	4,395	4,957	5,561	38.1%
South Norfolk	5,853	6,326	7,281	8,317	9,494	62.2%
Waveney	5,825	6,182	6,909	7,813	8,701	49.4%
England	1,838,539	1,963,484	2,219,877	2,546,936	2,897,354	57.6%

1.5 The County Council's view is that the requirement that 20% of new homes be built to the M4(2) standard is justified by the evidence of need and is consistent with national policy.

2. Question h)

Does the Plan make sufficient provision for inclusive design and accessible environments in accordance with paragraphs 57, 58, 61 and 69 of the NPPF?

2.1 Policy PUBDM42 sets out that development must:

- Be easy to navigate

Supporting text identifies the relationship between ease of navigation and dementia, with wayfinding elements aiding people with cognitive impairments (such as dementia) to navigate the built environment. Several examples are given as to how this requirement can be delivered.

- Promote permeability and accessibility

This requirement, which applies to all new development, helps to recognise the needs of an increasing number of people with mobility problems.

- Be capable of adapting to changing circumstances

Again, this requirement applies to all new development. A key changing circumstance is the ageing population, with an increase in the number (and proportion) of people with physical and cognitive impairments.

2.2 Arguably, the Plan as set out by the Broad could provide greater clarity as to the intent and detailed requirements of the design policies, but it is not the case that the Plan is unsound as submitted.