

IPSWICH CORE STRATEGY REVIEW AND SITES ALLOCATIONS & POLICIES EXAMINATION
LOCAL PLAN EXAMINATION - STAGE 2

Matter 8 – Heritage, Design, and the Natural Environment

8.1 Are the policies in connection with heritage, design, and the natural environment soundly-based? If you contend that they are not how should they be modified?

DM5: Design and Character

The part of the policy relating to the optional technical standards for Part M is unsound because it is a) unjustified; and b) ineffective.

Part of the policy requires that in developments of 10 or more dwellings, 35% of the units will be built to Part M4 (2) of the Building Regulations – accessible and adaptable homes. Where affordable housing is provided in a scheme a proportion of the homes is required to be built to Part M4 (3) of the Building Regulations – wheelchair accessible homes.

Firstly, the Core Strategy does not state what the threshold site size will be that will trigger affordable housing obligations. If it is 11 or more dwellings in line with the Written Ministerial Statement of 28 November 2014, then we are concerned that schemes of 11 or more dwellings will be required to provide 35% of the units as Part M4 (2) dwellings and an as yet unspecified proportion as Part M4 (3) wheelchair accessible units. This may not only present viability difficulties, but the policy lacks clarity in terms of what the Council is actually seeking. The Council needs to clarify precisely how many of the affordable homes will need to be provided as Part M4 (3) wheelchair accessible homes.

Secondly, the Council needs to satisfy the tests set out in the NPPG to justify the adoption of the optional technical standards. The Council has not properly considered the viability implications of requiring compliance with these standards. The Council has acknowledged that housing delivery is sensitive to policy costs (paragraph 7.9.1 of the Viability Assessment supporting the Core Strategy). It can only sustain 15% affordable housing. The viability assessment warns against introducing “other additional policy costs” which would prevent sites being delivered. We also have noted paragraphs 7.3 and 7.4 of the *Background to the proposed requirement for accessible and adaptable dwellings and wheelchair user dwellings*, December 2015 report. We agree that the cost of building to Part M4 (2) is broadly comparable to the cost of Lifetime Homes, so one could argue that this is covered by the allowance that is made for the Code for Sustainable Homes in the viability assessment since Lifetime Homes was one of the elements of the Code (see paragraph 7.3). However, paragraph 7.4 observes correctly the much higher costs associated with building to Part M4 (3) – wheelchair user dwellings. The DCLG

report to support the Housing Standards Review titled *Housing Standards Review: Cost Impacts*, September 2014 (EC Harris) summarises the costs on page 38. The cost of building to Part M4 (3) adds an average of about £16,000 to the cost of construction. The Council has not modelled the effect of this on viability. In paragraph 7.4 it argues that since the standard will only apply to the affordable housing element it will treat this as an exceptional cost which can be negotiated against other policy requirements. The Council may well choose to do this but its approach would be contrary to paragraph 174 of the NPPF, which requires the local authority to assess the cumulative costs of all existing and proposed standards. We refer back to the cautionary note in the Council's Viability report about not overloading development schemes with additional policy related costs.

The Council has come up with a reasonable case for the necessity of adopting these standards. We have noted the document *Background to the proposed requirement for accessible and adaptable dwellings and wheelchair user dwellings*, December 2015. This shows that 23.6% of the population will have reached retirement age by 2031. To this one must add the 3% of residents who have stated that they already have a need. However, these figures do not justify 35% of homes constructed to Part M4(2) plus an unspecified number built to Part M4(3) in addition to this. This would suggest that 27% of people may need an accessible or wheelchair accessible home. Moreover, people are not the same thing as households. At best we consider that a 25% requirement for Part M4 (2) would be justified.

The policy should also be amended to reflect the guidance in the NPPG (ID 56-008-20150327) which states that "Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied". In paragraph 5.2 of the *Background to the proposed requirement for accessible and adaptable dwellings and wheelchair user dwellings*, December 2015 report the Council observes that "due to the topography of Ipswich, many older properties are accessed by a number of steps". There are likely to be residential development locations in Ipswich which will be unsuitable for the Part M optional standards. Policy DM5 should be amended to refer to this by saying: "In locations of the Borough where it is not possible to provide step-free access owing to the topography, neither of the Optional Requirements will apply".

The Council will need to be mindful of the Government's intention that Starter Homes will need to be provided as 15 or 20% of the total units of any residential scheme above 10 units. Setting targets in excess of the Building Regulations will remove the Council's ability to secure contributions to other policy objectives (the entire affordable housing element of all schemes in Ipswich will need to be provided as Starter Homes).

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