

Central Lincolnshire Policy S23 Meeting Accommodation Needs Evidence Report

Formerly Policy S22

March 2022



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1. Introduction

- 1.1. The Central Lincolnshire Local Plan is being updated since the first Local Plan for Central Lincolnshire, an area covering the districts of City of Lincoln, North Kesteven and West Lindsey, was adopted in April 2017.
- 1.2. This Evidence Report (which is one of a collection) provides background information and justification for Policy S23, which relates to meeting the accommodation needs of residents.

2. Policy Context

National Policy and Guidance

- 2.1. Since the Central Lincolnshire Plan was adopted the National Planning Policy Framework (NPPF) was updated in July 2018 with subsequent additional changes being published in February 2019 and a further update in July 2021.

- 2.2. Paragraph 7 of the NPPF explains that:

“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”

- 2.3. Paragraph 8 goes on to state that:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

... b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and...”

- 2.4. Section 5 relates to Delivering a sufficient supply of homes. Specifically relevant to this policy are:

Paragraph 62, which states

“...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”

- 2.5. The Planning Practice Guidance (PPG) was first introduced in 2014 which offers ‘live’ government guidance. The PPG provides guidance to help in the implementation of policy in the NPPF.

- 2.6. One of the categories within the Planning Practice Guidance (PPG) is 'Housing needs of different groups'. This section of the PPG, when read as a whole, sets out how housing needs of different groups are to be assessed and planned for.
- 2.7. In September 2020 the Government held a consultation – [Raising accessibility standards for new homes](#). As the title of this consultation suggests, Government were seeking views on how to raise accessibility of new homes, particularly relating to Part M of the Building Regulations. The consultation set out 5 options, namely:
1. Consider how recently **revised planning policy** on the use of optional technical standards **impacts on delivery of accessible housing**.
 2. **To mandate the current M4(2) requirement in Building Regulations as a minimum standard for all new homes**, with M4(1) applying by exception only where M4(2) is impractical and unachievable (e.g. a new build flat above a garage). M4(3) would apply where there is a local planning policy in place in which a need has been identified and evidenced.
 3. **Remove M4(1) altogether, so that all new homes will have to at least have the accessible and adaptable features of an M4(2) home**. M4(3) would apply where there is a local planning policy in place in which a need has been identified and evidenced. This would mean that no new homes could be built as M4(1).
 4. **To mandate the current M4(2) requirement in Building Regulations as a minimum standard for all new homes** with M4(1) applying by exception only, **a set percentage of M4(3) homes would also need to be applied in all areas**. So rather than local authorities setting a local planning policy for the provision of M4(3), a defined and constant percentage would apply to all new housing.
 5. **Change the content of the mandatory technical standard**. This could be done by upgrading the statutory guidance to create a revised M4(1) minimum standard. This revised standard could be pitched between the existing requirements of M4(1) and M4(2), adding more accessible features into the minimum standard.
- 2.8. Whilst the outcomes of this consultation are not yet available, it is clear that the Government intends to increase the accessibility of homes being built and to deliver this through Building Regulations.
- 2.9. The above has been taken into account in preparing the Local Plan as a whole, and policy S23 in particular.

Local Policy

- 2.10. The adopted Local Plan includes a policy that specifically relates to Meeting Housing Need. This policy, Policy LP10, sets out that developers should provide or contribute to a mix of housing tenures, types and sizes. The policy also specifically refers to the need to cater for the needs of older people and disabled people and their changing needs over time through the provision of a proportion of homes that meet the higher access standards of Part M of the Building Regulations, with M4(2) standards being required on 30% of dwellings and positively seeking a higher proportion, or some homes that meet the enhanced M4(3) standards wherever possible.

3. Context and Evidence

- 3.1. The Central Lincolnshire Housing Needs Assessment (HNA) (April 2020) identifies that:

- The number of people aged 65 and over living in Central Lincolnshire is now in the region of 65,000, with the majority (96%) living in private households as owner occupiers. It is anticipated that this growth will continue through the plan period. In addition to ensuring there is an adequate supply of private dwellings to meet the needs of an aging population, there is a projected need for around 90 bedspaces in communal establishments each year. This is additional to the overall dwelling requirement.
- People with disabilities account for about one in five residents in this area and tend to live in private households rather than institutional accommodation. This emphasises the importance of suitably accessible housing, achieved both when new housing is delivered – by aligning with national standards, for example – and through the continued delivery of adaptations.

3.2. Chapter 6 of the Whole Plan Viability Assessment includes details of a number of costs to development, this includes the delivery of Part M4(2) standards. Table 6-6 of the Whole Plan Viability Assessment identifies that meeting this standard costs £1,400 per dwelling and when applied as the adopted Local Plan does (requiring it on 30% of dwellings) it has an average cost of £420 per dwelling.

3.3. The evidence presented in the HNA and that in the Whole Plan Viability Assessment has been used in formulating this policy as well as national policy and guidance.

3.4. This policy is one of a number of policies that address the specific aspects of housing needs, including Policy S22 Affordable Housing, and Policy S83 Gypsy and Traveller and Travelling Showpeople Accommodation.

4. Issues and Options Consultation

4.1. The Issues and Options consultation identified the existing policy LP10: Meeting Accommodation Needs as a policy not intended to be changed. A very small number of comments were received on this proposal not to change the policy. The comments are set out below:

- Should be revised to actively discourage building in the countryside and direct it into towns.
- This policy should be reviewed as the requirement for dwellings to be built to M4(2) standards is having a significant impact on viability and requires a significant amount of work to ensure compliance. Instead, it should be encouraged, not required.

5. Regulation 18 Consultation

5.1. A Consultation Draft of the Local Plan was published for consultation between 30 June and 24 August 2021. During this eight week consultation comments were received on the plan, the policies within the plan, and supporting information and evidence.

5.2. A number of comments were made in relation to this policy The comments received have been summarised as follows:

- Various comments broadly supporting the policy.

- The policy is too vague / unclear
- Concern that the policy is too restrictive in relation to location for development
- Various comments suggesting the policy needs substantial or significant rewording, especially in relation to ensuring delivery of older persons housing.

5.3. It was not considered necessary to make any specific changes to the policy in light of the majority of comments received. However, in order to enhance clarity with regard to support for applications that meet the higher access standards of Part M Building Regulations, the second paragraph of the policy has been amended as follows.

“Proposals which deliver housing at the higher access standards of Part M Building Regulations (Access to and use of buildings) to ~~M4(2) of the Building Regulations or~~ M4(3) standard will be ~~viewed favourably~~ encouraged.”

6. Proposed Approach in Draft Local Plan

6.1. The Draft Local Plan includes a policy in relation to meeting accommodation needs. Whilst this policy is based on the policy within the adopted Local Plan, there are some changes to take into account changes in national policy and the comments received during the Issues and Options Consultation.

6.2. Specifically, there is no longer a requirement for a set percentage of dwellings to be built to M4(2) standards as it is likely that this requirement will be included in Building Regulations in the near future as a result of the *Raising accessibility standards for new homes* consultation. This approach has been taken as it is clear that Government intends to incorporate the standards in building regulations in due course and as the cost per dwelling is relatively high, taking into account the other policy costs emerging from this plan.

6.3. Other elements of the equivalent policy in the 2017 Local Plan (LP10) relating to delivering a housing mix and residential care accommodation remain largely unchanged and are still sound.

7. Reasonable Alternative Options

7.1. The following alternative options have been considered for this policy (option 1 being the preferred option).

7.2. Option 2: A policy which requires a proportion of all housing to be delivered to higher accessibility standards. This option has been discounted, as although it would provide certainly in relation of delivery of homes, it raises the potential for other key infrastructure or energy efficiency standards to not be delivered as a result of viability impacts. This was considered to provide too high a level of uncertainty and risk, particularly given the expected changes to building regulations in due course.

7.3. Option 3: No policy relating to accessible housing and rely on national policy. This option has been discounted, as it would not provide an acceptable level of certainty in respect of the delivery of homes that meet the higher accessibility standards.

8. Conclusion

- 8.1. This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission Draft Central Lincolnshire Local Plan. This helps bring together relevant evidence that has informed this policy and how we have responded to comments received during the plan making process, as well as how the latest evidence and national guidance has been taken into account.