

KING'S LYNN & WEST NORFOLK LOCAL PLAN REVIEW EXAMINATION

Policy LP30 Adaptable and Accessible Homes – Justification for 50% of new homes to be built to M4(2) accessible standard (Building Regulations Part M)

On Day 10 (18 April 2014), the Inspectors requested further justification, regarding the Policy LP30 requirement, for “50% of new homes must be built to meet requirement M4(2) of Part M of the Building Regulations: Category 2 for accessible and adaptable dwellings”. This note explains, in further detail, the background evidence base supporting the inclusion of this policy criterion.

This note is a response to action point 113 of the Inspectors Action List.

Previous submissions

The Borough Council’s response to the Matters Issues and Questions (MIQs) [G6, Q350] explained that the M4(2) accessible standard requirement was derived from the Housing Needs Assessment [D3]. Viability implications were considered through the submission evidence base [D1], which found that the additional construction costs in delivering M4(2) standard housing is minimal [H43a, Q350(a)].

However, the Housing Needs Assessment found that the annual need for adaptable homes would generate a need for 38-40% of the overall local housing need to be constructed to (M4(2)) standard. The 50% requirement therefore seeks an uplift to provision of M4(2) accessible standard housing. The Borough Council proposed, through the submission Plan, that the 50% standard is aspirational but deliverable (2023 NPPF para 16(b)).

Additional evidence

Officers from the Strategic Housing and Planning Policy teams have considered the need to provide additional justification for the Policy LP30 50% M4(2) accessibility standard policy requirement, to address the Inspectors’ outstanding concerns.

The Housing Needs Assessment figure (215 M4(2) dwellings per year) equates to 39% of the updated local housing needs figure (554 dwellings per year). This is in line with previous evidence, presented in the Council’s response to the MIQs [H43a]. Therefore, the evidence remains stable, namely that there is a need for around 40% of new dwellings to be constructed to M4(2) accessibility standards.

It was previously highlighted that the M4(2) standard would have little/ minimal implications for development viability, at just £600 per dwelling [H43a, Q350(a)]. On this basis, the Council put forward that 50% was achievable and would have negligible impact on development viability.

Notwithstanding, it is accepted that the evidence of need clearly points to a 40% requirement, rather than the 50% sought through Policy LP30 (as submitted). Although the Borough Council’s position has been that 50% is aspirational, it is accepted that there is no firm supporting evidence for seeking this uplift, other than its contributing towards supporting “the health and wellbeing of our communities” (Corporate Strategy 2023-2027).

Conclusions

Further to the Council's earlier evidence [H43a, Q350] it was considered that the 50% policy requirement is aspirational and appropriate. However, the evidence base for need (38-40%), identifies minimum numbers of M4(2) standard homes needed and it is accepted that this should be the starting point in setting policy requirements.

Unless there is specific evidence to support an uplift from 40% to 50% for future M4(2) standard housing, the policy should be set at 40% to align to the Housing Needs Assessment [D3]. Therefore, a Main Modification to Policy LP30 (and consequent amendments to the supporting text, paragraphs 7.4.5/ 7.4.10) is recommended, as follows:

Policy LP30- Adaptable and Accessible Homes

All new homes must be designed and constructed in a way that enables them to be adaptable, so they can meet the changing needs of their occupants over their lifetime. Planning permission will be granted for new dwellings subject to the following:

- *50% 40% of new homes must be built to meet requirement M4(2) of Part M of the Building Regulations: Category 2 for accessible and adaptable dwellings.*

7.4.5 The National Building Regulations include specific nationally agreed construction standards (the M4(2) standard) which would deliver accessible and adaptable homes. However, as a national standard they are optional and depend partly on the viability of this aspect when considered with other requirements of the Local Plan. So, the Borough Council is requiring that 50% 40% of dwellings on a scheme must meet the M4(2) standard, in accordance with the 2020 Housing Needs Assessment (HNA). Homes built to this standard are more flexible and readily adaptable as people's needs change. They are suitable not just for the elderly but also for families with pushchair needs, or those with a temporary or permanent disability or health issue.

7.4.10 The evidence studies suggest that all new homes in the Borough should be designed to be adaptable to meet current and future needs. The HNA (page 83/84) states that the need for adaptable and accessible homes in King's Lynn and West Norfolk by ~~the end of the plan period (2036~~ (the end-date for the study) will be either be 12,354 or 13,215 depending upon whether it is assumed that all or 50% of the institutional population have mobility issues. ~~However, the~~ The Local Plan Review Viability Assessment (Simon Drummond-Hay, 2020) has concluded that it is ~~only~~ financially viable for 50% 40% of all new homes to meet requirement M4(2) of Part M of the Building Regulations. The Policy reflects the supporting evidence base findings.

