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Dear Sir/Madam,

RE: WITCHFORD NEIGHBOURHOOD PLAN CONSULTATION RESPONSE

On behalf of Bellway Homes Limited (Eastern Counties), Savills has been asked to submit comments in relation to the emerging Neighbourhood Plan for Witchford. Whilst Bellway support the Parish Council's production of a Neighbourhood Plan, as well as the primary principles and objectives it contains, there are concerns with the suitability and deliverability of the latter part of draft policy WNP- H1. This states:

'Homes should be designed to be suitable for independent living and built to be accessible and adaptable dwellings (M4(2) standard).'

These concerns have been raised at the previous Regulation 14 consultation stage. Whilst it is noted that the Council has produced a further 'Housing Standards Evidence Report' to seek to justify the requirement, it is not considered that this provides the necessary justification to ensure a sound Plan.

Furthermore (and notwithstanding whether the evidence base is considered sufficient – we consider it is not), the actual implications of including this policy could in fact hinder key objectives set out within the Neighbourhood Plan, such as the delivery of much needed homes at more affordable prices. The Neighbourhood Plan states itself that a key housing issue is:

"the need for smaller housing units to enable young people to stay in Witchford..., for affordable housing units for single-person households and families, and for bungalows or adaptable housing units to allow older residents to downsize from family homes to free these up."

This phrasing in itself confirms that the need for adaptable housing is just one of several key housing priorities for the settlement and the expectation that **all new homes** meet the M4(2) requirement will undermine the ability to maximise the affordability of smaller homes for other members of the community. This and other principal concerns with the M4(2) policy requirement are set out below:

1. Inadequate evidence

The optional building regulation M4(2) seeks to achieve homes that are accessible and adaptable. This primarily affects those persons that may have a mobility impairment, whether through age or disability. The Council has prepared a 'Housing Standards Evidence Report' to seek to justify the application of this optional building regulation on all new properties within the Neighbourhood Plan area. This Evidence Report refers to various principles within the NPPF which support the national policy intention of achieving inclusive communities. However, we would reiterate that the requirement for **all** properties to meet the M4(2) standard risks jeopardizing this national policy intention through limiting opportunities for smaller more affordable market homes (see above as well as points 2 and 3 below). Furthermore, the Planning Practice Guidance also acts as



a significant material consideration, setting out the Government's specific intentions relating to the application of optional technical standards such as M4(2). This states:

*'Local planning authorities should take account of evidence that demonstrates a **clear need** for housing for people with specific housing needs and plan to meet this need' (own emphasis) (Reference ID: 56-005-20150327).*

In other words, the justification for an M4(2) requirement must be based on a clear **need**, rather than an aspirational desire, no matter how laudable this desire might be.

The Evidence Report also refers to the 2015 Local Plan and policy HOU 1 which suggests that schemes of 50 or more units should provide a proportion of homes suitable or adaptable for the elderly or those with disabilities, through meeting Lifetime Homes or the equivalent standard. The Evidence Report claims '*The Part M4(2) standard could be interpreted as being similar to the Lifetime Homes standard, and is endorsed by the NPPF*'. The NPPF makes no such endorsement for Lifetime Homes, which was revoked in 2015. The application of such a policy requirement is consequently out of date and does not warrant use to seek to justify the application of M4(2) standards. In any event, the Lifetime Homes standard was historically only applicable to a proportion of homes that met a specified size threshold (i.e. 50). The current Neighbourhood Plan seeks to apply a far more restrictive policy on all new homes built within Witchford than even the now obsolete Local Plan policy, yet with inadequate evidence to justify this onerous requirement.

In terms of the evidence contained within section 3 of the Evidence Report, this provides some anecdotal, high level statistics on general trends regarding age demographics and health but fails to provide any evidence on the existing housing stock within Witchford and the extent to which it addresses (or otherwise) this potential demand. There is also no evidence to suggest the tenure from which the demand might arise, as identified as an evidence tool within the NPPG (Reference ID: 56-007-20150327).

Based on the simplistic evidence that is presented, one can infer that 23.4% of the Witchford population are estimated as aged 65+ in 2017. However, again, there is no evidence as to their lifestyle or tenure type. For instance, whether they live in private housing, social housing or registered care. This cannot consequently be extrapolated to understand the demand for adaptable dwellings specifically within Witchford. Whilst some national trends are identified, such as the fact that 29% of households nationally will include a person aged over 65 by 2021, this once again does not provide any 'clear understanding' (Reference ID: 56-006-20150327) on the resultant housing **need**.

Some brief figures relating to illness and disability are also provided, though again at the national level. There is also no understanding or clarification provided as to the age demographic of those with specified illness or disability, without which one cannot understand the extent that may fall within the over 65 category and so risk 'double counting' if such statistics were simplistically used to make any kind of assumption on need for homes to meet the M4(2) optional standards. Furthermore, the Witchford-specific figures on activity level are out of date, being from 2011 and once again provide no age profile.

Whilst the evidence supplied does show some simplistic trends that there is a slightly higher proportion of elderly population in Witchford than the national average, it also indicates a generally more healthy population than the national average. However, these trends are mostly based on 2011 census data, which is now somewhat out of date. The fundamental issue is that these more general trends have not been transferred to an understanding of local housing need within the designated area where the Neighbourhood Plan will apply. Without such an understanding, there is no justification for any requirement for the application of optional M4(2) standards. The high proportion of private ownership within Witchford does not help justify a need for the application of the M4(2) standard. If anything, a private owner has greater capability to make more fundamental adaptations to a home than a party who may live within a different tenure such as private or social rent. Whilst it may be more costly to adapt a home that has not been built to M4(2) standards, this does not restrict opportunities for such adaptations outright.

In terms of viability, section 4 of the Evidence Report has failed to appreciate the implications of a 100% M4(2) compliant scheme. In order to achieve this standard, larger plot size is required to allow for the larger car parking spaces, as well as a larger property footprint to allow for the larger circulation areas within the properties. As a result, one cannot simplistically extrapolate a 100% assumption of M4(2) compliance onto the baseline. A lower density scheme would inevitably result, which has not been taken into account when understanding the RLV/ha. Furthermore, whilst a reduction in value of 6.2-12.6% may on its own not appear wholly restrictive, the Evidence Report does not appear to consider other policy criteria or S.106 obligations for which an allowance should be provided. The baseline appears to only address assumptions on the CIL contributions and 30% affordable housing provision. This leaves a significant amount of potential site specific mitigation or costs left unconsidered. To have a potential reduction in value of 6.2-12.6% as a result of a single policy requirement that is not suitably justified by evidence, is wholly unsound.

2. Risks the efficient delivery of homes

The requirements of M4(2) specifically require increased circulation space within corridors and all the primary rooms within the house including wash rooms, bedrooms, kitchens and living areas. As already noted, such increased requirements result in a greater overall floorspace to each home and subsequently reduced ability to use each housing site as effectively as would otherwise be possible. This is compounded by external requirements, such as ensuring a car parking space allocated to each property can increase in width to that of a disabled bay. All such criteria mean fewer homes can be accommodated on each site, which ultimately means the same number of homes will need to be delivered on more housing sites. This does not appear to have been taken into account in selecting housing allocations.

3. Higher purchase prices

In light of the M4(2) standard resulting in larger properties, this has a negative impact on the affordability of homes available within the local market area. Property prices are typically led by the sqft of a property and as such, increasing the size available to accommodate the M4(2) requirement will inadvertently increase the purchase price of the properties on the market. Given a number of young families or those seeking starter homes will likely prioritize property cost rather than future adaptability, it is not considered such a policy requirement is effectively addressing the needs of all the community. If the Witchford Neighbourhood Plan imposes this policy requirement on all homes within their area, it risks pressuring those that cannot afford the higher cost that results from this optional building regulation from living in the village and instead having to locate to nearby villages where such a requirement is not imposed.

The Neighbourhood Plan itself states a Housing objective is:

"to maintain a thriving community through the provision of housing to meet the range of needs of current and future residents of Witchford ... [and that] it is particularly important that the stock of smaller homes is increased in the Parish."

The requirement for **all** new homes within Witchford to meet M4(2) requirements would appear to run wholly counter to such objectives and lead to the Plan being unsound in this respect.

Summary

On the basis of the above, it is considered that a requirement for **all** new homes in Witchford to be built to the optional M4(2) standard would not be evidentially-based or justified, and would thus be unsound.

Such a requirement will result in the less effective use of sites due to the footprints required to meet the M4(2) standard so resulting in the need for more housing sites, as well as higher resulting purchase prices to reflect the higher floorspace, thus resulting in all new homes being less affordable.

Given these adverse implications and the fact that evidence does not suggest all homes would need to meet M4(2) standards, it is considered that the M4(2) policy requirement should be removed from the Neighbourhood Plan.

Yours faithfully,

A handwritten signature in black ink that reads "Mills". The signature is written in a cursive style with a large, looped initial 'M'.

Claire Mills MSc MRTPI
Associate