



Document Reference
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East Cambridgeshire
District Council

Policy LP6 – Meeting Local Housing Needs

November 2017

Contents

1. Introduction and Policy Context.....	1
2 East Cambridgeshire Context in Relation to Policy LP6.....	2
3 Local Plan Policy – Preliminary draft	6
4 Local Plan Policy – Further Draft.....	7
5 Alternative Reasonable Options.....	12
6 Conclusion	13

1. Introduction and Policy Context

Introduction

- 1.1 East Cambridgeshire District Council is reviewing its Local Plan, which was last adopted in April 2015. The new Local Plan, which is hoped to be adopted in 2018, will provide a framework for development in the district until 2036 and beyond.
- 1.2 This Evidence Report (which is one of a collection) provides background information and justification for policy LP6 (of the Proposed Submission Draft Local Plan, November 2017), which relates to meeting local housing needs.

National policy

- 1.3 The National Planning Policy Framework (NPPF) was published in March 2012 and the National Planning Practice Guidance (NPPG) was introduced in 2014 which offers 'live' government guidance.
- 1.4 Section 6 of the NPPF concerns the delivery of a wide choice of high quality homes and there is a separate section on "Plan-making". The following paragraphs are particularly relevant to this policy:
 - Paragraph 50- To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should: plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).
 - Paragraph 159- Local planning authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs... including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).
 - Paragraph 173- Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.
- 1.5 In addition to the above, following the Housing Standards Review (2013/14), Government issued a written statement on 25 March 2015 which confirmed their intention to prevent Local Plans from setting their own standards and instead impose national standards via the Building Regulations system (the revisions to Building Regulations came into force in October 2015). The three exceptions to this are:
 - A Local Plan could require internal minimum space standards for all dwellings, though such standards could only be those as prescribed by government.
 - A Local Plan could require water efficiency measures in new houses which would aim to reduce average occupier use of water down from 125 litres (as required by Building Regulations) to 110 litres.
 - A Local Plan could require higher standards than required by Building Regulations in relation to access to, from and within buildings, though such standards could only be those as prescribed by government.
- 1.6 A Local Plan can only require one or more of these optional standards if the standard will address a clearly evidenced need and the viability implications of introducing the standard have been adequately considered.

1.7 The following National Planning Practice Guidance is relevant to meeting accommodation needs:

“Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and / or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

- the likely future need for housing for older and disabled people (including wheelchair user dwellings).
- size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
- the accessibility and adaptability of existing housing stock.
- how needs vary across different housing tenures.
- the overall impact on viability. ...

(Reference ID: 56-007-20150327)

“Establishing future need for housing is not an exact science. No single approach will provide a definitive answer. Plan makers should avoid expending significant resources on primary research (information that is collected through surveys, focus groups or interviews etc and analysed to produce a new set of findings) as this will in many cases be a disproportionate way of establishing an evidence base. They should instead look to rely predominantly on secondary data (eg Census, national surveys) to inform their assessment which are identified within the guidance.”

(Reference ID: 2a-014-20140306)

1.8 In addition to the above NPPF/NPPG matters, two more recent Acts are also important to this policy.

1.9 The Self-build and Custom Housebuilding Act 2015 places a requirement on Local Planning Authorities to maintain a register of individuals and associations of individuals who have expressed an interest in acquiring land for the purposes of self-build or custom build.

1.10 More importantly, on 12 May 2016 the Housing and Planning Act was granted Royal Assent. This Act has wide ranging implications for the planning system, including plan making. This included new duties relating to houseboats and caravan dwellers (s124). However, notably, the elements relating to Starter Homes still require to be ‘enacted’ and/or supported by Regulations in order for it to come into force, from a practical sense, and there remains some doubt in this respect, particularly in the context of what the Housing White Paper 2017 proposes.

1.11 The above NPPF policy, NPPG guidance and legislative framework has been taken into account in preparing the Local Plan as a whole, and policy LP6 in particular.

2 East Cambridgeshire Context in Relation to Policy LP6

2.1 East Cambridgeshire falls within the Cambridge Sub-Region Housing Market Area (HMA), and the district council fully cooperate with all those districts which similarly fall within the HMA.

2.2 The Strategic Housing Market Assessment (SHMA) for the HMA is produced slightly different to other locations, in that it is a ‘live’ document in many aspects, and sections

(rather than the whole SHMA) updated as and when required. The latest publication date is May 2014, based on updated information in 2013, and is therefore entitled 'SHMA 2013'. The SHMA contains a wide range of information, much of which is not directly relevant to plan making.

- 2.3 Whilst, ideally, a full SHMA review would be welcomed alongside preparation of the new Local Plan, collectively across the HMA area this was not agreed (for the primary reason that Local Plans are being progressed or recently adopted based on the 2013 work), then the following NPPG paragraph applies:

"Where Local Plans are at different stages of production, local planning authorities can build upon the existing evidence base of partner local authorities in their housing market area but should co-ordinate future housing reviews so they take place at the same time."
Source: Planning Practice Guidance Reference ID: 2a-007-20150320

- 2.4 The districts have a long history of such joint working, and collectively sign up to the latest SHMA (2013 version, published in 2014), the Population, Housing and Employment Forecasts Technical Report 2013 (April 2013) and the Cambridgeshire & Peterborough Memorandum of Cooperation 2013.

- 2.5 At around 2013, plan making across the HMA area was broadly aligned from a timing perspective, and based on the above evidence. However, for a variety of reasons this is no longer the case. Some of the Local Plan have been adopted, (Fenland, 2014 and East Cambs, 2015), whilst others are at examination stage (Cambridge City and South Cambs) and another is yet to commence its examination (Huntingdon).

- 2.6 In addition, two districts have commenced preparation of a new Local Plan (East Cambridgeshire / Forest Heath). The intention is for these two Local Plans to be adopted in 2017 or 2018. In commencing the preparation of these two Local Plans, the question was raised within the HMA area whether a full SHMA update, for the whole HMA area, should be produced, in order to meet the above NPPG expectation. However, due to the fact that a number of Local Plans were at an advanced stage of preparation using the 2013 version of the SHMA, it was collectively noted, at an officer level, that a full SHMA review would not take place in the immediate future.

- 2.7 In that regard, the above NPPG advice applies.

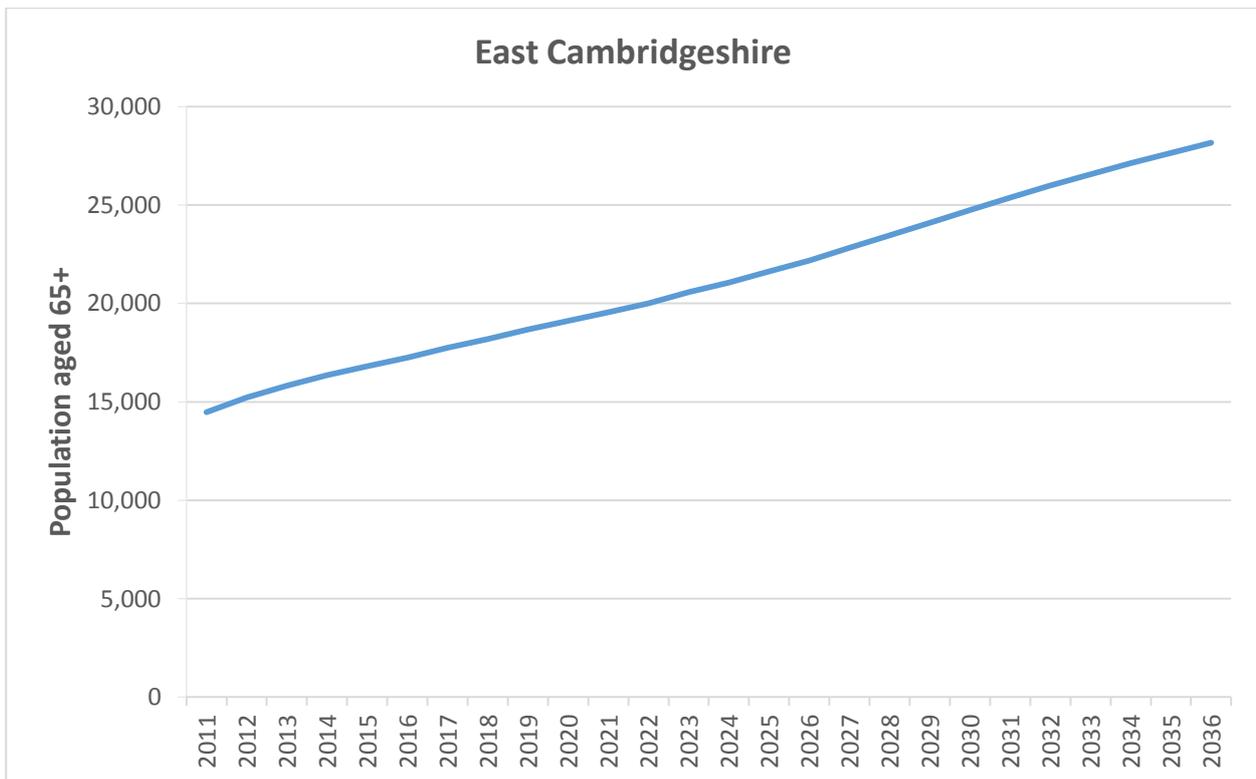
- 2.8 As such, a variety of shorter update reports have been produced by individual districts as considered appropriate by those districts to inform their Local Plan preparation. These update reports primarily focus on establishing an up to date objectively assessed need for that individual district, building on the evidence base of partner local authorities.

- 2.9 In the medium term, and in acknowledgement of the above NPPG advice, the districts acknowledge that a full refresh of the SHMA will be necessary at some point, which will inform a completely new round of Local Plans to be prepared thereafter.

- 2.10 For the present emerging East Cambridgeshire Local Plan, the Cambridgeshire Research Group prepared an 'Objectively Assessed Housing Need' report, dated January 2016 (published February 2016), which was subsequently updated in October 2016. This report provided emerging evidence relating to the overall housing need for East Cambridgeshire, including affordable housing need for the district.

- 2.11 For the purpose of Policy LP6, the affordable housing need is most relevant. The January 2016 version (http://www.eastcambs.gov.uk/sites/default/files/ECDC_OAN-Update_08-02-2016.pdf) identified a total need for affordable housing of 2,854 dwellings for the period 2014-36, which amounted to 20-22% of the overall housing need figure.
- 2.12 The report was updated again (dated October 2016) over the summer 2016, but, for affordable housing purposes, the same conclusions apply (namely that a total need for affordable housing of 2,854 dwellings for the period 2014-36, which amounts to 25% of overall supply (the slight % increase reflecting the fact that the total housing need/supply is reduced in the October 2016 version)).
- 2.13 In terms of Higher Access standards, East Cambridgeshire follows similar national trends in terms of matters such as an ageing population, disability rates, and inadequate accessible housing.
- 2.14 Data from the government Office for Disability Issues show that there are more than 11 million disabled people in Great Britainⁱ.
- 2.15 The number of 'disabled' people is rising. This is partly because society is ageing: the Office for National Statistics estimates that in England in 2021, compared to 2011, there will be 24 per cent more people aged 65 and over and 101 per cent more people aged 85 and overⁱⁱ. As impairment rises with age, the number of disabled people is rising in part due to this growth in the older population in the given environment. [Estimates](#) show there will be an increase in the number of older disabled people, rising from 2.3 million in 2002 to 4.6 million by 2041ⁱⁱⁱ.
- 2.16 This increase in 'disability' is also due to the slow progress made in tackling the inequality that faces people with impairments (disabled people) – so impairments have a more disabling impact that they would if barriers were tackled.
- 2.17 In relation to housing Government [data](#) from the English Housing Survey^{iv} shows that 21.5 million homes in England are not even fully 'visitable' by disabled people, meaning that they do not have four very basic design features: level access; a flush threshold; door width and circulation space compliant with Part M of Building Regulations and a toilet on the entrance level. These four features are much less than needed to allow a property to be liveable in by many disabled people, but still only 5 per cent of homes had these four features.
- 2.18 [Habinteg](#) reported in 2010 that 78,300 wheelchair user households in England have unmet housing needs^v, while [Aspire](#), in 2014, found that only 14 per cent of people with spinal cord injury in England are discharged from hospital to a permanent accessible property^{vi}. Leonard Cheshire Disability has estimated that there are [300,000 disabled people](#)^{vii} on housing waiting lists across Great Britain.
- 2.19 As housing has historically been built to poor standards of accessibility, demand for housing adaptations is particularly high: demand for Disabled Facilities Grants, to fund adaptations, is [estimated](#) to be 10 times available funding^{viii}.

- 2.20 Poor design standards in nearly 10 million homes in England mean that [adaptive work](#) to make the property visitable (not liveable in) by a disabled person would be expensive or impossible^{ix}. These and other factors [mean](#) that:
- 1 in 3 households with a disabled person still live in non-decent accommodation;
 - 1 in 5 disabled people requiring adaptations to their home believe that their accommodation is not suitable;
 - More than a quarter of disabled people say that they do not frequently have choice and control over their daily lives^x.
- 2.21 Inaccessible housing can increase physical and psychological distress: the combined [cost](#) of hospitalisation and social care for hip fractures (most of which are due to falls) is £2 billion a year or £6 million a day^{xi}. Even if only a proportion of these are linked to poorly designed housing, the savings from designing housing to be accessible could be huge. Inaccessible housing can also mean people moving unnecessarily and against their choice to care homes the average cost of which (without nursing cost) ranges from £480 a week in the north west of England to £625 in London^{xii}. Inaccessible housing can also delay hospital discharge and again the costs can be significant: the average cost of an [excess bed day](#) was £273 in 2012/13^{xiii} and available data cites 41,789 days delay [waiting](#) for community equipment/adaptations and 53,584 days for other 'housing' reasons^{xiv}.
- 2.22 93 per cent of [older people](#) live in mainstream housing and while there is a shortage of specialist housing for older people in England, older people will continue to want to live in mainstream housing – underlining the growing need for accessible housing for this group^{xv}.
- 2.23 More locally, for East Cambridgeshire district, the following graph prepared by the Cambridgeshire Research Unit illustrates the forecast rapid rise in the older people (65+) in the district. The Unit has also provided evidence to confirm that there is a forecast of an increase of 7,620 people aged over 75 between 2014-36, with this age group particularly prone to ill health and mobility issues.



3 Local Plan Policy – Preliminary draft

3.1 The Preliminary Draft Local Plan (February 2016) contained a policy entitled Meeting Local Housing Needs. A number of representations were made on the policy, and in summary the key issues raised for the policy were:

- Policy is premature as Government’s housing agenda is not finalised.
- Policy not consistent with current council practice ‘Boosting Housing Supply’ position paper
- Policy not in accordance with Written Ministerial Statement (WMS) dated 25th March 2015 which confirms that: “the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”. The Council has not provided sufficient evidence to justify adoption of higher access standards.
- Threshold/ requirements for affordable, self- build, higher access standards should be subject to robust viability testing taking account of other policy costs.
- It is suggested that residential care accommodation should include all supported housing accommodation for the elderly and provision should be based on needs assessment.
- Concern that policy requirement that all development proposals should set aside a proportion of the site (likely to be a minimum of 5% of the net developable area) for self-build plots. NPPF and Housing and Planning Bill do not stipulate any mandatory requirement.

3.2 The following response to the above issues, and changes (or not) to the Local Plan were made for the Further Draft Local Plan, as follows:

3.3 The Local Plan has to address the emerging issues from, amongst other matters, the Housing and Planning Act. The Local Plan cannot wait until the national picture is clearer, as inevitably, at that point, government will shortly thereafter issue another new initiative.

- 3.4 The 'Boosting Housing Supply' position paper provided a 'short term' solution to housing delivery and it was to be replaced by the emerging Local Plan. Local Plan polices will provide a long term solution to boosting housing supply.
- 3.5 Viability is an important issue. It is acknowledged that the policy requirements on affordable housing and access standards do add cost to development schemes and that these requirements need to be carefully considered before including these in the policy. The Council has published a viability report (January 2017) that takes into account the policy requirements in the Local Plan and assesses their impact on viability. This viability report justifies the affordable housing targets and access targets, with evidence on 'need' for access standards set out in this evidence report and (for demographic information, for example) the SHMA.
- 3.6 The policy is fully consistent with national policy, including Written Ministerial Statements.
- 3.7 The suggestion to widen or amend the residential care accommodation section was not accepted, as it is considered the policy is flexible enough to deal with a variety of scenarios, without being too prescriptive about exactly what does or does not apply.
- 3.8 In respect of the self-build 'ask', there is a strong demand for self-build plots in East Cambridgeshire, as demonstrated by the large number of self-build properties claiming CIL relief and the high number of people listed on our statutory Self-build and Custom Housebuilding Register. National policy requires the Council to put in place measures to help meet such demand, and the policy is considered a reasonable response to such demands. The current Local Plan (2015) contains a very similar framework (Policy HOU1), which has been found sound and works in practice. Data on CIL self-build relief in East Cambridgeshire is as follows:

CIL self build relief given	
1 January – 31 December 2014	49
1 January – 31 December 2015	56
1 January – 31 December 2016	87

- 3.9 The policy therefore has firmed up the 5% 'ask', but clarifies this is only for sites of 100 dwellings or more. This matches the 2015 Local Plan policy. More generally, the policy was also boosted by an 'in principle' support for self-build.
- 3.10 Finally, the policy also introduced a short section on 'Park Homes', clarifying that these will be acceptable on sites suitable for permanent dwellings.

4 Local Plan Policy – Further Draft

- 4.1 The Further Draft was consulted upon, and the following summarises the issues raised:
- Some support the current wording of Draft Policy LP6.
 - Support the broad aim of Policy LP6 which suggests that affordable housing is set at 20% in Soham.
 - Needs more flexibility for viability.
 - Should make reference to Key worker housing.
 - Clearer wording required on general & specialist older peoples housing including specified proportions of bungalows.
 - Some concerns about the practicalities of delivering self build plots by a self-builder alongside the delivery of the majority of housing within a larger

development by house builders. It could be that the self build plots could remain uncompleted for a number of years after the main development has finished and this has health and safety implications for residents.

- Starter homes should be replaced with the term used in the White Paper, namely “affordable home ownership products” (White Paper, page 101).
- It may be more appropriate for the affordable housing requirement to be up to 30% rather than a minimum of 30%.
- It would be more appropriate to encourage self-build homes rather than require 5% of all plots to be self-build when there may not be market demand for self-build homes as part of larger sites.
- The increased life expectancy and the increased time that people spend in poor health or with a limiting chronic illness demonstrate the need for specialist care for elderly people in the District.
- Whilst we support the requirement for a minimum of 30% affordable housing provision onsite, the draft policy wording is too prescriptive and contains no flexibility for assessment of viability.
- Lack of evidence for M4(2) requirement
- Should be some category M4(3)

4.2 The following response to the above issues, and changes (or not) to the Local Plan have been made for the Proposed Submission Draft Local Plan, as follows:

4.3 Key Worker housing is not a form of affordable housing, and therefore not appropriate to refer to in this policy. That said, Key Workers may well benefit from the policy.

4.4 The practicality of delivering 5% self-build is not of concern. The policy has been applied over a number of years, and works satisfactorily. Good masterplanning of a site will ensure no conflict, or health and safety issues, with the main developer of the site. There is also a clear demand for self-build in the district, as demonstrated by the high proportion of ‘self build relief’ given. And, as a result of this demand, it is not considered necessary to put in place a complex policy requirement to account for scenarios where self-build plots are not taken up (with some representors saying in such scenarios, the land should revert back to the main developer to build homes). Indeed, by putting in place such a policy framework could have the unintended (or perhaps even intended) consequence of the 5% self-build plots being marketed under such poor terms so as to never be sold, and hence trigger the reversion back to the main developer (for the benefit of the main developer).

4.5 It is agreed that the words ‘a minimum of’ should be deleted, so that it simply reads ‘provide 30% affordable housing’.

4.6 It is also agreed that wording needs introducing in respect of viability.

4.7 A number of respondents referred, in a general sense (i.e. not specific policy wording) to the need for the plan to deliver homes for the elderly. The Council agrees with these sentiments (as does the recent Housing White Paper). Whilst national policy on this matter is expected (indeed required, by virtue of recent legislation), in advance of such national policy, the plan has been amended. By way of context for such changes, it is known that older people occupy nearly a third of all homes. Nearly two-thirds (60%) of the projected increase in the number of households from 2008 to 2033 will be headed by someone aged 65 or over.

4.8 As people get older, their housing needs often change. Some people need support to be able to continue living in their own homes. Some people, of all ages, have disabilities that mean their homes need to be adapted. Providing homes for older people could help people to live independently for longer, and reduce costs for health and social care services.

- 4.9 Helping older people to remain in their own homes and preventing or delaying the need to go into hospital or residential care can help improve the quality of life for older people and reduce costs to local services. Providing more options for older people to move to more suitable housing, when they want to, can also help to free up larger homes for use by families.
- 4.10 Many older people do not want or need specialist accommodation or care and may wish to live in general housing, or in homes which can be adapted to meet any change in their needs.
- 4.11 Existing national policy is somewhat light in terms of what planning authorities should do about planning for homes for older people. There is a short reference at NPPF para 50, which states “...local planning authorities should...plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, **older people**, people with disabilities, service families and people wishing to build their own homes)”
- 4.12 The supporting document to the NPPF, the NPPG, says a little more:

“Housing for older people

The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). The age profile of the population can be drawn from Census data. Projection of population and households by age group should also be used. Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish. Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that are under occupied. The future need for specialist accommodation for older people broken down by tenure and type (eg sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Local authorities should therefore identify particular types of general housing as part of their assessment.”

- 4.13 The matter is raised in the Housing White Paper (HWP) (DCLG, Feb 2017), where it states at para 1.16 “...we know that more people are living for longer. We propose to strengthen national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.”
- 4.14 Further at paragraphs 4.42-43 of the HWP, it states:

*“Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, **the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older***

and disabled people. *Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services. It will also set a clear expectation that all planning authorities should set policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. In addition, we will explore ways to stimulate the market to deliver new homes for older people.*

4.43 Helping older people to move at the right time and in the right way could also help their quality of life at the same time as freeing up more homes for other buyers. However there are many barriers to people moving out of family homes that they may have lived in for decades. There are costs, such as fees, and the moving process can be difficult. And they may have a strong emotional attachment to their home which means that where they are moving to needs to be very attractive to them and suitable for their needs over a twenty to thirty year period. There is also often a desire to be close to friends and family, so the issues are not straightforward.

*4.44 The Government is committed to exploring these issues further and finding sustainable solutions to any problems that come to light. To do this we will draw on the expertise of a wide range of stakeholders including housebuilders (both specialist and mainstream); mortgage lenders; clinical commissioning groups; housing associations and local authorities; and most importantly older people and the groups that represent them. **We want to build on the evidence that already exists to help deliver outcomes that are best for older people.** This conversation will generate a range of ideas for incentives and other innovations for the Government to consider: improved information and advice for older people about housing choices, including advice on adaptations; supporting custom build for older people; looking at how community living could work; as well as innovative models of housing with support available. These will sit alongside the Government commitments to fund and develop supported housing, including sheltered, step down and extra care housing, ensuring that the new supported housing funding model continues to provide the means for older people to live independently for longer while relieving pressure on the adult social care system.*

4.15 The **Neighbourhood Planning Act (2007)**, as referred to in the HWP, states:

“The Secretary of State must issue guidance for local planning authorities on how their local development documents (taken as a whole) should address housing needs that result from old age or disability”

4.16 As set out above, it is clear that Government intends to ‘do something’ about homes for the elderly, but at this stage it is not clear exactly what. This will only become clear once new national policy on this matter is published, and we are unlikely to know what this is until the NPPF is published later this year.

4.17 Cambridgeshire County Council (CCC) clearly has an interest in this matter, particularly as it has close links to the wider (and costly) adult social care agenda.

4.18 CCC has prepared a number of related evidence sources or strategies, most of which can be found here: <http://cambridgeshireinsight.org.uk/older-peoples-housing>.

4.19 However, reading through this collection of evidence, whilst it highlights extensively the issue of homes for older people, and highlights we ‘must do something’ about it, there appears no direct recommendation as to how, exactly, planning policy should ‘do something’.

- 4.20 The Further Draft Local Plan reflected current national policy, and is relatively light on homes for older people, and certainly so in a direct sense. Of the limited reference, Policy LP6 (Meeting Local Housing Needs) stated, by way of introduction, that: *“Development proposals for housing will be supported where they cater for the needs of all sections of the community, providing a range of high quality homes of varying sizes, types and tenures to meet current need, including homes for market rent and plots for self-build”*
- 4.21 Policy LP6 also included a section on *“Dwellings with Higher Access Standards”* though the Policy and supporting text isn’t specifically referencing older people, though in reality it is older people alongside disabled people which will benefit most from the policy, because dwellings built to these standards are more adaptable and easier to use for the more vulnerable and frail in society
- 4.22 It can be challenging for a Local Plan (or the planning system as whole) to do a lot about homes for the elderly, because it is very rare for the planning system to stipulate who resides in a building once complete. Planning can only really stipulate design measures, which can influence who then resides in such properties. (for example, a new bungalow built may attract older people to purchase it, but there would be nothing to stop anyone of any age doing so, and when it comes to a planning application, conditions would not be added to an approval of a scheme which stated that *‘these homes are only for older people’*).
- 4.23 As such, the Local Plan:
- couldn’t realistically insist on bungalows or other features aimed at the elderly on certain sites, unless that specific site had wider (mostly likely visual) reasons for doing so;
 - couldn’t insist on a certain site (or parts of a site) being set aside only for developers which specialise in providing homes for the elderly.
- 4.24 However, the Local Plan has been amended in a few ways, to help address the issue.
- 4.25 First, as a minor tweak, LP6 introduction spells out more clearly that it means homes for the elderly, so that it reads:
- “Development proposals for housing will be supported where they cater for the needs of all sections of the community, providing a range of high quality homes of varying sizes, types and tenures to meet current need, including homes for: older people; market rent; and plots for self-build”*
- 4.26 Secondly, LP6 has a new section, specifically referencing older people. This is predominantly a supportive policy (rather than one which requires something in all instances), though it does require the applicant to at least consider, and evidence such consideration, older people and their needs. This is considered an appropriate and pragmatic position to take in the Local Plan.
- 4.27 On a separate matter, a new second paragraph has been added to the policy, directing developers to the latest evidence on housing need. This wording matches recently found sound wording in the Central Lincolnshire Local Plan.
- 4.28 On another separate matter the third paragraph now makes reference to ‘negotiating’ the amount of affordable housing, so as to ensure viability is considered.
- 4.29 On another separate matter, whilst not something raised during the consultation process, Policy LP6 has been extended through the introduction of a section on houseboats.

- 4.30 East Cambridgeshire has a number of navigable waterways and, to a limited degree, **houseboats** can be found in the district (a houseboat is defined by s8(3) of the Housing Act 1985, as inserted by s124 of the Housing and Planning Act 2016, as '*a boat or similar structures designed or adapted for use as a place to live*'). It is acknowledged that houseboats are a lifestyle choice for some residents and they contribute to the diversity of homes within the District.
- 4.31 The Council has a statutory duty (s8(3) of the Housing Act 1985, also inserted by s124 of the Housing and Planning Act 2016) to '*consider the needs of people residing in or resorting to their district with respect to the provision of ... places on inland waterways where houseboats can be moored*'. However, on the basis of: the very limited number of houseboats in the district (10 are officially registered as such, via published Council Tax data); no representations received during the preparation of the plan seeking locations to be identified for houseboats; and no wider evidence of 'need' for houseboat accommodation being presented, the Council determined that it was not appropriate to attempt to identify suitable sites for houseboats. To do so would not be a proportionate response to the duties under the Act.
- 4.32 Nevertheless, the Council accepts that, during the lifetime of the plan, there may be instances whereby someone wishes to seek permission for a houseboat, or houseboats. As such, a policy framework for such instances is necessary, and in providing such a policy, the Council is, from a planning policy context, satisfying its statutory duties above.
- 4.33 In setting out a policy for houseboats, the Local Plan aims, as a whole, to deliver new development in sustainable locations and so the same principle apply to proposals for houseboats. The policy below will ensure that potential residents of houseboats benefit from the same level of access to services and facilities as those living in traditional housing.

5 Alternative Reasonable Options

- 5.1 The following alternative options have been considered for this policy. (Option 1 in each case is the preferred policy approach which has been included in the Proposed Submission Draft.)

(a) Policy LP6 – Meeting Local Housing Need (Affordable Housing)

The alternative options considered for this policy were:

1. A policy requiring a proportion of housing to be affordable
2. No policy, rely on national policy

Providing affordable local housing will help in accommodating people in need. Having a clear policy in the Local Plan (Option 1) will not only provide affordable housing but also help to address inequalities based on income. There is a need for more affordable housing in the district. A clear policy based on local need and supported by evidence will help to deliver more affordable housing than just relying on national policy. The proportion of affordable housing sought (20-30%, on site over 10) is based on need (around 25% of all dwellings) and viability (20-30%).

(b) Policy LP6 – Meeting Local Housing Need (Dwellings with higher access standards)

The alternative options considered for this policy were:

1. Policy requiring all dwellings to meet Part M (volume 1) category 2
2. No policy, rely on national policy

3. Policy requiring a proportion of dwellings to meet Part M (volume 1) category 2
4. Policy requiring a proportion of dwellings to also meet Part M (volume 1) category 3

Providing dwellings that are accessible creates more inclusive communities and enable those with limited mobility to access a dwelling. There are cost implications for the developers in providing housing with accessibility standards. Balance has to be reached in providing housing to accessibility standards and making the scheme unviable. Whilst options 2 and 3 are the most 'viable' options, they fail to address the need identified.

(c) Policy LP6 – Meeting Local Housing Needs (Self-build homes)

The alternative options considered for this policy were: Options Considered

1. Policy requiring a proportion (5% net developable area) of new residential sites to be set aside for self-build homes
2. No policy, rely on national policy
3. Policy requiring higher proportion of site area/ lower site threshold to provide higher proportion of self-build homes
4. Policy requiring lower proportion of site area/ higher site threshold to provide lower proportion of self-build homes

Option 1 is considered most appropriate as it addresses need, without overly burdening landowners and developers.

(d) Policy LP6 – Meeting Local Housing Needs (Residential care accommodation)

The alternative options considered for this policy were: Options Considered

1. Policy as drafted, including ensuring residential care accommodation is well related to existing settlements
2. No policy, rely on national policy

Option 1 emerges as a clear favourite as it will provide benefits to people requiring care. This option may include the use of undeveloped land outside of settlement boundaries, where it is necessary, but there are many clear benefits associated with this option.

(e) Policy LP6 – Older People, Houseboats, Caravan Dwellers / Park Homes,

The alternative options considered for this policy were: Options Considered

1. Policy as drafted, which are essentially supportive, criteria based policies
2. No policy, rely on national policy
3. Policy(s) which allocate specific sites for some or all of these forms of accommodation

Option 2 is rejected, as there is national policy / legislation expectation for a Local Plan to provide a steer on such forms of accommodation

Option 3 is also rejected, because a more flexible criteria based policy is considered to be appropriate to deal with proposals as they emerge, partly reflecting the relatively low need/demand for Houseboats and Caravan dwellers, and partly because it is inappropriate for the planning system to stipulate age requirements on certain land rather than others. No suggested sites aimed only at one of these categories were put to the council.

6 Conclusion

- 6.1 This Evidence Report demonstrates the rationale for the policy as contained in the Proposed Submission Draft Local Plan (November 2017). It is hoped this helps

demonstrate how we have responded to comments received during the consultation stages, as well as how the latest evidence and national guidance has been taken into account.

ⁱ Disability Facts and Figures, [Office for Disability Issues](#) and [Department for Work and Pensions](#), January 2014.

ⁱⁱ Ready for Ageing? www.parliament.uk April 2013

ⁱⁱⁱ Lifetime Homes, Lifetime Neighbourhoods, DCLP/DWP/DH, 2008

^{iv} English Housing Survey 2012, DCLG.

^v Mind the Step, Habinteg, 2010.

^{vi} 'Aspire's research finds massive shortfall in accessible housing in the UK', www.aspire.org.uk

^{vii} No Place Like Home, LCD, December 2014.

^{viii} Disabled Facilities Grants in England, Astral Advisory, April 2013

^{ix} English Housing Survey 2012, DCLG.

^x Disability Facts and Figures, [Office for Disability Issues](#) and [Department for Work and Pensions](#), January 2014.

^{xi} Later Life in the United Kingdom, AgeUK, July 2015.

^{xii} Paying for Care, www.payingforcare.org

^{xiii} Reference costs 2012-13, DH.

^{xiv} Delayed transfers of care, England 2012-13, www.england.nhs.uk/statistics

^{xv} Later Life in the United Kingdom, AgeUK, July 2015.