

Comment

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Event Name	Local Plan Publication Consultation June 2023
Comment by	Rosanna Tunnadine (1338677)
Comment ID	41
Response Date	21/07/23 15:01
Consultation Point	Policy 13 Housing Mix and Standards (View)
Status	Submitted
Submission Type	Web
Version	0.1

Part(s) of Local Plan responding to

To which part(s) of the Local Plan does your response relate to?

Please indicate the documents(s) and part(s) you are commenting on.

Publication Local Plan (including changes to the Policies Map designations) - Page number(s) / Paragraph number(s) / Policy no./name / Place-based strategy / Site Allocation(s) no./ name / Maps / Tables

Sustainability Appraisal Report - Page number(s) / Paragraph number(s)

Other (for example an omission or alternative approach)

Publication Local Plan - Page 227 - Section 17 - Housing Mix and Standards - Policy 13.E

Legal Compliance, Soundness and Duty to Co-operate

Do you consider the Local Plan is:

Legally Compliant

Sound

Complies with the Duty to Co-operate

Reason Consider Unsound

Do you consider the Local Plan is unsound , because it is not:

Details of reason(s) for representation

Please give details of why you consider the Local Plan is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments. *Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.*

About Habinteg

Habinteg has over 50 years of experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response, therefore, focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Richmond-upon-Thames.

Please don't hesitate to contact us if we can help in any way

Modification(s) consider necessary

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified in the question above. Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. *Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.*

As an expert housing provider with a specialism in accessible homes, Habinteg welcomes the opportunity to comment on the development of the Richmond-Upon-Thames local plan.

We note that Policy 13.E of the draft local plan is in general conformity with the London Plan and states that

"At least 10% of all new build housing (via works to which Approved Document M (ADM) Volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings' and all other new build housing (created via works to which Part M volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings', in accordance with London Plan Policy D7. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement as set out in London Plan Policy D5 to demonstrate how the highest standards of accessible and inclusive design have been achieved."

Habinteg strongly supports this policy and recommends that all new homes meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in Richmond-upon-Thames.

In order to address a deficit of wheelchair accessible homes, Habinteg strongly approves that 10% of all new homes meet Part M4 (3) Standard (wheelchair user dwelling) irrespective of being market or affordable dwellings.

Habinteg believes that every local plan needs to:

- Establish clear requirements for a proportion of all new housing to be built to the Building Regulations optional access standards.
- Specifically name M4(2) and M4(3) standards in its plan with clear percentages of new homes required in each, regardless of whether a regional strategy or plan indicates an overarching requirement or not.

We are therefore encouraged to see these standards specifically mentioned in policy 13.E.

Suggestions for final policy wording

Habinteg has conducted detailed analysis of local plans in respect of their accessibility policies and in the course of this work has identified examples of good practice which we would recommend are given

consideration in the finalisation of the wording of the Richmond-Upon-Thames policy statement.

1. We would recommend consideration be given to including additional wording to emphasise the overall intent of the policy to adequately provide for accessible housing requirements across all tenures and throughout developments. This will help to increase options for a wide range of households who may require accessible properties.

We have identified good practice in drafting local planning policies that may help with this, for example a paragraph stating:

'Where the scale of development would generate more than one wheelchair accessible home, based on the requirements of this policy, the mix of sizes, types and tenures of wheelchair user dwellings should reflect the mix of sizes, types and tenures of the development as a whole as closely as possible (unless there is evidenced need for additional wheelchair accessible properties in one particular type or tenure).' (Source: Doncaster local plan)

2. We recommend additional wording that is very specific about the scope for exceptions. This can be supported by including wording along the following lines within the planning policy itself for the avoidance of doubt:

'Exceptions to this requirement will only be considered where the applicant can robustly demonstrate with appropriate evidence that site specific factors make the policy unfeasible or unviable. (Source: Doncaster local plan)

3. In relation to requirements for wheelchair accessible properties, distinguishing between what regulations require of market homes - M4(3)a Wheelchair Adaptable standard, as distinct from homes for which the council have referral or nomination responsibility - M4(3)b Wheelchair Accessible standard is helpful detail for developers. For example by including a paragraph such as:

Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'. (Source: Reading local plan).

Participation at Examination

Do you consider it necessary to participate in examination hearing session(s)?

If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.