

**HEARING SESSION NOTE
BY HORSHAM DISTRICT COUNCIL &
CRAWLEY BOROUGH COUNCIL**

ISSUE 3

Lifetime and Wheelchair Adapted Homes

&

ISSUE 4

Sustainable Construction – Policy WB22

**HORSHAM DISTRICT AND CRAWLEY BOROUGH LOCAL
DEVELOPMENT FRAMEWORKS**

**WEST OF BEWBUSH JOINT AREA ACTION PLAN
DEVELOPMENT PLAN DOCUMENT**

February 2009



**Horsham
District
Council**



Issue 3: Affordable Homes adapted to Lifetime Homes Standards and for Wheelchair Users

1.0 Introduction

- 1.1 In relation to the targets for Lifetime Homes and wheelchair adapted homes within Policy WB11 (Affordable Housing), the Councils were asked at the hearing session on 27th January to provide comparative evidence of the needs for affordable homes adapted for special needs within their local authority areas.
- 1.2 Such evidence as was available has been gathered and is presented in Appendix 1 of this document.

2.0 Evidence of the Special Needs Requirements in Horsham District and Crawley Borough

- 2.1 The comparative evidence available and presented in Appendix 1 suggests that the level of households with one or more people requiring special needs adapted housing is not significantly higher than average in Horsham District. Although Crawley Borough's level of households with special needs appears at first sight to be high, it should be noted that Crawley Borough used a different methodology for calculating this need compared to other authorities in West Sussex at least. Therefore, it cannot be shown with any certainty that, on a like for like basis, Crawley's need is especially high.
- 2.2 Given the available evidence, the Council's wish to propose changes to Policy WB11 in order to ensure that the Policy is justified in relation to its evidence base as set out in Paragraph 4.52 of PPS12 and can therefore be considered 'sound'.

3.0 Proposed Changes to the JAAP

- 3.1 The Councils propose the following wording changes to the JAAP for the Inspector's consideration.
- 3.2 **4.18** A range of non-general needs housing ~~will be required~~ should be provided, such as wheel chair accessible homes, independent move-on accommodation, clustered accommodation and extra care. It is ~~anticipated~~ recommended that a ~~minimum~~ approximately of 25% of all affordable homes should meet fully adapted wheel chair standards and, in the event that national requirements do not come into force, the developers are encouraged to design approximately 20% of the scheme designed affordable homes to meet Lifetime-Homes standards.

3.3 Policy WB11 Affordable Housing

Developers are encouraged to design and build approximately A
~~minimum of 52%~~ of all affordable homes should be to fully adapted

wheel chair standards and approximately 20% of affordable homes should be designed to meet Lifetime-Homes standards.

3.4 Monitoring Framework

WBC4613	Supply of supported (non-general) needs housing	WB11	<ul style="list-style-type: none"> • A minimum of 5% <u>proportion</u> of all affordable dwellings to be fully adapted for wheelchair users (<u>approximately 2%</u>) • A minimum of 20% <u>proportion</u> of affordable dwellings to meet Lifetime Homes Standards (<u>approximately 20%</u>)
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Issue 4: Sustainability and Sustainable Construction – Policy WB22

4.0 Introduction

4.1 At the hearing session on 27th January, the Councils were asked by the Inspector to reconsider the targets and requirements within Policy WB22 in light of the limited evidence available to justify setting requirements ahead of and in anticipation of national requirements and likely changes to the Building Regulations. The Councils were asked to consider proposing changes to the Policy that would encourage rather than require sustainable construction and the provision of renewable and low carbon energy generation where these were additional to the current national and or regional requirements.

5.0 Proposed Changes to the JAAP

5.1 The Councils therefore propose the following wording changes to the JAAP for the Inspector's consideration.

5.2 Sustainability / Sustainable Construction

4.65 Sustainable development is widely recognised as '*development which meets the needs of the present without compromising the ability of future generations to meet their own needs.*' These aims are reflected in the PPS (Supplement to PPS1) on *Planning and Climate Change*, which sets out the need for spatial planning to make a full contribution to delivering the Government's Climate Change Programme as part of the drive to improve global sustainability. There is also a need to ensure that development has the potential to adapt successfully to likely future changes in the climate.

4.66 Both Councils recognise that spatial planning has a vital role to play in the setting of a framework within which development can become sustainable, reduce its overall impact on the environment and increase its ability to support life in its widest sense. The Core Strategies of both Councils recognise that the development should be based on maximising the opportunities for the promotion of renewable and low-carbon energy generation and the use of sustainable construction methods. In order to ensure that this Joint Area Action Plan fully embraces the principles of sustainable development, a number of issues are considered below, ~~including the overall standards of sustainable construction that will be required in residential and other development, as well as the need for~~ strongly encourage decentralised energy generation and water conservation for residential and other development in order to achieve an exemplary development in sustainability terms.

Reducing Energy Use and Carbon Emissions

4.67 The developers involved in constructing the new neighbourhood will be expected to develop a robust and ambitious energy strategy that will meet the objectives of the PPS on Climate Change, the South East Plan and of the Core Strategies of both Councils. In doing this, the developers will need to consider more than just the buildings themselves; for example, taking account of the likely energy demands of transport generated by the development itself.

<Image caption> Targets are included for on-site renewable and low-carbon energy generation

4.68 The energy strategy for the development should give primary emphasis to the need for energy efficiency and demand reduction. These should be achieved through a combination of measures including high specification construction techniques, building orientation that facilitates passive cooling and warming and education of building occupiers through, for example, home guides.

4.69 For residential development, the Government has set out an ambitious timetable for the reduction of emissions through the progressive tightening of the Building Regulations that will seek to achieve 'zero carbon' homes by 2016 and non-residential buildings by 2019. The Councils will expect all homes within the new neighbourhood to meet this timetable. However, reflecting the opportunities presented by the scale, mix and location of this development, there will also be an expectation that every effort is made, through the energy strategy, to ~~ensure that homes enable development to~~ exceed the national timetable for emission reductions. This additional ~~requirement~~ expectation will depend on the ability of the development to achieve an appropriate 'critical mass'. This is an estimate of the development's ability to provide enough demand to allow the viability of a wider range of sustainable and decentralised energy generation technologies. The critical mass involves aspects such as the layout, density and mixing of development that will determine the energy approach that can be used.

4.70 The form of development set out in this Joint Area Action Plan provides good opportunities to attain the critical mass that would be required for a significant 'community energy system' ~~based on, but not limited to,~~ possibly including a CHP system fuelled by locally sourced biomass or other sustainable and low-carbon source of fuel. Such systems depend on relatively dense development layouts and on the inclusion of a significant proportion of non-residential energy users that could provide the daytime demand for heat and hot water. The Councils also recognise that there may be further opportunities for an appropriately sized community energy system to serve new or existing development adjacent to the new neighbourhood covered by this Joint Area Action Plan. The developers will be expected to explore such opportunities in order to off-set carbon emissions of the new neighbourhood and strive to achieve a 'zero carbon development'. It is considered that this opportunity represents an appropriate strategy for the developers to meet the ~~requirement~~ expectation to exceed the Government's national timetable for emissions reduction for the development to make a contribution towards meeting the national,

regional and sub-regional targets for renewable energy and carbon emissions reductions.

4.71 It is likely that energy efficiency measures and a ~~community energy system~~ will not, in themselves, be sufficient to allow the emissions reductions targets set out in the national programme to be met and exceeded. Therefore, the energy strategy devised will need to set out a clear 'independent energy approach' that will show how ~~integrated~~ community and stand-alone low and zero carbon energy generation techniques can meet the required carbon emissions savings. Overall through the energy strategy, the developers will be expected to show how a minimum target of ~~5~~10% of the new neighbourhood's annual (non-transport) energy demands can be achieved through the generation of ~~on-site~~ decentralised renewable and low-carbon sources by the completion of the development.

Water Conservation, Harvesting and Reuse

<Image caption> Wherever ~~possible~~ feasible, rainwater harvesting through water butts will be incorporated

4.72 The need to conserve water supplies is a critical element of the overall strategy for achieving sustainable development in the new neighbourhood. All new development in this area must ensure that it incorporates a robust strategy to both conserve supplies as well as to ensure that wherever ~~possible~~ feasible water is reused and rainwater intercepted and harvested.

4.73 The developers involved in the neighbourhood will be expected to put in place such a strategy that will ensure that water ~~usage~~ demand is ~~minimised~~ substantially reduced and that there are no significant detrimental effects of the development on ecosystems downstream of the development. At the development level, this should include, where appropriate ~~s~~Sustainable ~~d~~Drainage ~~s~~Systems (SUDS) that are capable of reducing peak storm run-off and increasing local infiltration that can reduce the likelihood of flooding and protect aquatic ecosystems.

4.74 At the household level the Councils expect high standards of sustainable construction, including measures to ~~be put in place to achieve a maximum level of usage equivalent to 105 litres per person per day (pppd) which represents a saving of approximately one third of current water consumption in Horsham and Crawley~~ reduce overall water demand to exceed Building Regulations wherever feasible. In the same way as for energy, the water strategy will need to ~~use~~ consider both an 'independent dwelling' as well as a 'community' approach to demand reduction. Wherever feasible, ~~individual~~ homes should incorporate ~~appropriate maximum consumption levels as well as~~ water efficient fittings and appliances ~~wherever feasible. Wherever possible,~~ and simple rainwater harvesting through water butts ~~must be incorporated~~ to reduce external water consumption. Where further reductions are required, ~~for example in achieving Levels 5 or 6 of the Code for Sustainable Homes~~ possible, or where water butts are

~~inappropriate, household rainwater harvesting or gray water recycling systems or community rainwater harvesting systems will be required should be considered. Where, due to density considerations, water butts are inappropriate or where further water consumption reductions are required, community rainwater harvesting systems will be required.~~

Adaptation to Climate Change

4.75 National policy and best practice requires that new development is planned and designed in ways that recognise the likely impacts of climate change over the lifetime of the buildings and create a built environment that is resilient to both extreme and more gradual effects of a changing climate. For example, summer temperatures may rise in the future giving rise to the need for natural or low carbon ventilation methods in buildings.

4.76 It is essential, as a principle of design, that buildings are as flexible and adaptable as possible to allow for future changes and developers will be required to show how this has been considered for all types of buildings. This will include, for example, demonstrating, through water and energy strategies, how the design of all types of buildings could be made to incorporate adaptation features that will allow the management of overheating, increased rainfall intensity and increased frequency and severity of drought. Such features may include natural/low-carbon ventilation systems, methods of shading such as brise soleil and green roofs that can offer flood abatement and natural building insulation.

Environmental and Sustainability Performance of Dwellings

4.77 In December 2006 the Government introduced the Code for Sustainable Homes that sets out a new assessment framework for residential development. This replaced the former EcoHomes assessment method in April 2007. The new Code has been designed to integrate with the Building Regulations as a single national standard to guide the industry in the design and construction of sustainable homes, with the intention being to reduce the environmental impact of new residential development.

4.78 The Code sets out a range of standards in a number of sustainable construction areas that the developer should reach. There are six different levels that can be reached, with Level One being the lowest Level Six the highest. This is set out in detail in the Code for Sustainable Homes, which has informed this Joint Area Action Plan.

~~**4.79** The need to create a sustainable and exemplary neighbourhood incorporating a range of land uses, justifies the requirement for all homes to meet high levels of sustainability performance. Consequently all homes, from the commencement of the development, must meet Level 3 of the Code. Subsequently, from 2013, when the Government emission reduction target of 44% above Part L of the Building Regulations begins to apply, all homes must meet Level 4. Further, the developers must plan to provide a significant proportion of homes at~~

~~Levels 5 and 6 of the Code in the later stages of the development. These requirements apply equally to all homes including affordable homes, subject to any additional requirements of the Housing Corporation or successor bodies.~~

~~**4.80** The result of the requirements will be that the majority of the homes provided will meet Level 4 or above of the Code, with early phases meeting Level 3. This is considered a reasonable approach that fully reflects the requirements above relating to energy and water use. At each stage of the development, the emissions reduction targets, which are well known to constitute the largest portion of additional costs required in meeting the Code Levels, will reflect and be led by the Government's national timetable. This is considered the most reasonable approach in order to avoid prejudicing the requirements set out above for the energy strategy in terms of the delivery of a 'community energy system'. Further, the early work by the developers on the feasibility of a sizable 'community energy system' has suggested that high levels of emissions reduction, and possibly even a net zero carbon development, may be possible by the end of the plan period, assuming the appropriate critical mass can be achieved. Equally, the water consumption target levels for both Code Level 3 and 4 are equal at 105 litres pppd, reducing to 80 litres pppd for Levels 5 and 6. This represents a modest improvement over the maximum consumption levels that will soon be required by Building Regulations and is considered reasonable considering the potential impact of the development on water resources in this area of West Sussex.~~

~~**4.81** Given the factors outlined above, it is considered essential that, in addition to the targets for emissions and water use reduction, the development be designed to incorporate the other aspects of the Code for Sustainable Homes.~~

4.79 The development at West of Bewbush will offer the opportunity to create a genuinely sustainable and possibly an exemplary neighbourhood in sustainability terms. In order to achieve the objective of a sustainable new neighbourhood, the developers will need to ensure that opportunities are exploited to design and build the new homes to incorporate high standards of sustainable construction. This might involve the use of construction practices and technologies that go beyond those needed to achieve the energy and water requirements of Building Regulations and seek, in addition, to address the full range of aspects covered by the Code for Sustainable Homes. This approach would be encouraged to ensure, for example, that the sustainability of construction materials was carefully considered, that pollution was reduced, that the reduction and recycling of waste was planned for and that the ecological value of the site was protected and enhanced where feasible and viable.

4.80 Under current Homes and Communities Agency grant funding rules, all affordable homes must achieve Level 3 of the Code, which is a base level for homes to be considered sustainable. This minimum rating may be increased in the future. Reflecting these requirements and the need for a balanced approach between housing tenures and

mindful of the need to consider a full range of sustainable construction aspects, the developers are strongly encouraged to ensure that all of the homes on the development meet at least Level 3 of the Code. Where feasible and viable, homes achieving higher levels of the Code would be expected, particularly during the second and third phases of the development.

Environmental and Sustainability Performance of non-residential buildings

4.821 The new Code for Sustainable Homes applies only to residential development which leaves the established BREEAM standard as the only relevant choice for the assessment of the environmental and sustainability performance of commercial, retail, public and employment developments. The BREEAM standard has four levels attainable; 'Pass', 'Good', 'Very Good' and 'Excellent'. The Councils will expect that, wherever feasible and viable, the non-residential development within this neighbourhood should be built to at least 'Very Good' standard and, where opportunities allow, should include, ~~wherever possible,~~ individual buildings that meet the 'Excellent' standard.

4.832 This requirement expectation reflects the crucial role played by non-residential buildings in helping to achieve the critical mass required for the potential community energy system outlined above. In many respects the construction of larger commercial, employment, leisure or public (educational) buildings presents great opportunities for the use of sound sustainable construction techniques, renewable and low-carbon energy generation and water recycling. The developers will be expected to exploit these opportunities in order to secure high levels of sustainability performance and increase the viability of any community energy and water approaches employed.

Policy WB 22

Sustainability / Sustainable Construction

The design and construction of the development should incorporate high standards of sustainable construction and seek to exploit opportunities for the creation of a genuinely sustainable new neighbourhood.

An energy strategy will be required indicating how ~~both~~ independent and/or community approaches to renewable and low-carbon energy generation will be implemented to meet and exceed (where ~~possible~~ feasible and viable) the national timetable for carbon emissions reductions in new homes. Overall the energy strategy should show how at least 510% of the development's annual (non-transport) energy needs can be met through ~~on-site~~ decentralised renewable and low-carbon generation.

A water strategy will be required to show how the development's overall water demand can be reduced in order to meet and exceed

(where feasible and viable) the Building Regulations. all homes can be designed to achieve a maximum water consumption target of 105 litres or less pppd.

The new neighbourhood should be designed and constructed to incorporate the principle of adaptation to climate change.

New homes should Developers are strongly encouraged to incorporate the sustainable construction practices and technologies required to address the full range of aspects covered by the Code for Sustainable Homes and should strive to ensure that all homes meet a minimum of Level 3 of the Code, for Sustainable Homes, rising to a minimum of Level 4 for dwellings constructed in or after 2013. Later phases (post 2016) should include a significant proportion of homes that meet Levels 5 and 6 of the Code. Where feasible and viable, homes achieving higher levels of the Code will be expected, particularly within the second and third Core Phases.

Developers are strongly encouraged to ensure that Aall non-residential development in the neighbourhood should meets a BREEAM standard of at least 'Very Good' or its equivalent under any replacement code, with a proportion of buildings meeting the 'Excellent' standard.

In the event that, for viability reasons, the developer considers the full requirements for sustainability can not be met in part or all of the development, the local planning authority will need to be satisfied fully that this is the case. In these circumstances it will discuss with the developer how and to what extent the requirements might be amended.

5.3 Monitoring Framework

WB 18	Delivery of energy infrastructure	WB 22	<ul style="list-style-type: none"> Completion of a 'community energy and/or heat system' including a CHP plant and ESCo establishment by 2015/16
WBC 19 15	Renewable/Low-carbon energy generation capacity installed by type	WB 22	<ul style="list-style-type: none"> A minimum of 510% of the new neighbourhood's overall (non-transport) annual energy requirements to generated from on-site renewable and low-carbon sources by 2018
WC20	Renewable/Low-carbon Energy (including hot water) generated on site that is consumed off-site	WB 22	<ul style="list-style-type: none"> Maximise sale of site generated renewable/low-carbon energy to achieve a near net 'zero carbon development' by 2018 Potential to achieve full net 'zero carbon development' beyond the plan period
WBC 21 16	Environmental and sustainability performance of buildings <u>The proportion of all homes meeting Level 3 or above of the CSH</u>	WB 22	<ul style="list-style-type: none"> All homes completed from 2011 to 2013 to achieve Level 3 or above of the CSH All homes completed from 2013 to 2016 to achieve Level 4 or above of the CSH Homes completed after 2016 to achieve a broad mix of Levels 4, 5 and 6 of the CSH All relevant non-residential development to achieve a mix of 'Very Good' and 'Excellent'

			levels of BREEAM or equivalent <ul style="list-style-type: none"> • <u>100% is being encouraged by Policy WB22</u>
WC17	The proportion of all <u>relevant non-residential buildings meeting BREEAM 'Very Good' or above</u>	WB22	<ul style="list-style-type: none"> • <u>100% is being encouraged by Policy WB22</u>

Appendix 1

Issue 3: WB 11 – Affordable Housing

Comparative Evidence of People with Special Needs requiring Lifetime Homes and Wheelchair Adapted Homes

Table 1: Incidence of Disability by Tenure

District	Population (2006)	Owner Occupied no mortgage %	Owner occupied mortgage %	Private rented %	Housing Association rented %	Council Rented %
Adur	60,300	23.4	14.4	31.0	37.3	38.8
Arun	145,700	24.9	12.3	19.9	25.0	40.4
Chichester	108,900	14.7	8.7	12.5	31.0	-
Crawley	99,900	No data included in 2004 Crawley Housing Needs Report				
Horsham	128,300	20.3	6.9	11.1	31.7	-
Maidstone	140,600	19.8	8.9	16.6	41.3	-
Mid Sussex	129,100	15.0	6.2	13.4	28.8	-
Surrey Heath	81,600	39.9	24.9	6.5	26.3	-
Winchester	104,511	7.9	15.6	11.2	24.9	29.3
Worthing	98,700	23.4	9.1	20.9	38.0	-

Sources: 2003/4 David Couttie Associates conducted Housing Needs Surveys, cited in: WSCC Commissioning Strategy for Supported Housing Individual Local Authority Housing Needs Surveys

- Adur and Arun have the highest incidence of disability in West Sussex in all cases with the exception of Housing Association Rented, whereby Worthing have the highest incidence.
- Horsham's incidence of disability is highest in the Housing Association Rented sector.

Table 2: Total level of Disability by District

	Estimated Number of Households with one or more person with a disability	Estimated % of all Households with one or more person with a disability	Estimated number of People with a disability
Adur	5,641	21.9	6,547
Arun	12,742	19.5	14,419
Chichester	6,907	14.9	7,711
Crawley*	10,582	26.4	13,829
Horsham	7,764	14.6	7,399
Mid Sussex	6,491	12.3	7,079
Worthing	8,033	18.3	9,342
Total	58,160	17.8	66,326

Source: 2003/4 David Couttie Associates conducted Housing Needs Surveys, cited in WSCC Commissioning Strategy for Supported Housing

*Crawley used a different and broader definition in the survey used and therefore should be assumed to have a higher incidence than would be expected using the survey used by other Local Authorities

- Adur and Arun have the highest levels of disability, with the exception of Crawley (whereby methodology needs to be confirmed)

Table 2a: Total level of Disability by District (outside of Horsham District- for comparison)

	Population (2002)	Estimated Number of Households with one or more person with a disability	Estimated % of all Households with one or more person with a disability
Baslidon	165,661	12,149	16.8
Castle Point	86,601	7,373	21.2
Rochford	78,489	5,463	16.9
Southend-on-Sea	160,257	10,154	13.7
Thurrock	148,397	13,290	21.9

Source: 2003/4 David Couttie Associates conducted Housing Needs Surveys – Thurrock Council

Table 3: Predicted number of wheelchair users by District

	Population 2006	Wheelchair uses	Wheelchair users % of population
Adur	60,300	975	1.62
Arun	145,700	2,355	1.62
Chichester	108,900	1,760	1.62
Crawley	99,900	1,610	1.61
Horsham	128,300	2,090	1.63
Mid Sussex	129,100	2,100	1.63
Worthing	98,700	1,605	1.63

Source: WSCC Commissioning Strategy for Supported Housing

Table 4: Incidence of Disability on Housing Register

	Housing Register	% Disability registered or application
Crawley ¹	2,950	5
Horsham	1,300	4.4
Mid Sussex ²	2,905	7.9
Waverley ³	3,325	1

Source: Local authority Housing Registers

Note: Measures of disability on housing registers vary by authority. ie

¹ Crawley - figures include all special needs. 1% of register have a Physical Disability.

² Mid Sussex – no of applicants on Supported Housing database is 199 (7.9%)

³ Waverly - figures likely to be low as others with disabilities are included in other categories that cannot be separated.