

LDF NCC

From: Jo Mossman <[REDACTED]>
Sent: 11 March 2016 14:53
To: LDF NCC; Dawn Alvey
Cc: Jane Urquhart (Cllr); 'Anne Darby'
Subject: Comments on the Local Plan Part 2 - LAPP from Nottinghamshire Disabled People's Movement

Follow Up Flag: Follow up
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Please find below comments on the Local Plan Part 2 - LAPP from Nottinghamshire Disabled People's Movement:

4149 The LAPP states that The City Council is "committed to design excellence and promoting high quality, sustainable design, not just in terms of aesthetic appearance, but also improving quality of life, equal opportunities and economic growth."

Whilst some of the LAPP seems to support these principles, there are sections, particularly in relation to housing, employment and the environment where this approach is not consistent and there are piecemeal proposals which are not inclusive for disabled and older people. We believe the City Council should amend some of the proposals in the LAPP in order to ensure inclusion and that it is meeting its general and specific duties of the Equality Act. We hope that action will be taken as needed.

Chapter 4 Development Management Policies
Housing Size, Mix and Choice

Para. 4.7 states:

4518 "To ensure that new housing development does not exacerbate the current unbalanced housing stock it is necessary to provide a suitable mix and balance of housing across the City including family, affordable, specialist and student housing, so that there is a range of good quality homes in appropriate locations with good connections to jobs, services and leisure opportunities. In appropriate locations this may include custom or self-build housing. Alongside this, the City Council and its partners are investing in the refurbishment and improvement of housing stock."

The wording of the above sentence implies that the categories of housing mix of affordable, specialist and student housing are mutually exclusive. They are all interlinked, for example there will be a need for affordable housing whether it is family, 'specialist' or for students. This needs to be made clear in the document.

4519 We urge the City Council to apply inclusion principles to all types of housing development and housing mix, regardless of the type of housing (e.g. large family houses, student accommodation, 'specialist' housing) to incorporate 100% homes built to Category 2 National Housing standard and 10% built to Category 3 standard.

Para. 4.14 states:

4520 "Factors that will be taken into account in terms of assessing the capability and suitability of a site to accommodate family housing will include: amenity, layout, potential to incorporate outdoor amenity space, outlook, design and access to community facilities. It is recognised however that there may be instances where properties or sites are not capable or suitable for accommodating family housing. Examples of this include some smaller brownfield sites, (e.g. former petrol filling

stations) where abnormal decontamination or site assembly costs may prevent a high level of family housing provision. Equally, in particularly accessible locations, such as defined town centres or transport hubs, where higher densities may be appropriate."

- It is concerning that contamination as an issue is only mentioned as an issue in relation to family housing. This is something that is relevant to all types of housing and other developments.

Policy HO1: Housing Mix

We are very concerned about the overall tone of the policy with regard to housing that is 'suitable' for disabled and older people. Whilst the policy emphasises the need for a mix and balance, the breakdown of housing types (family, student, affordable, specialist/adaptable) does not support this approach. Dividing housing into these categories does not support an inclusive approach to housing provision and if anything, could lead to segregation and exclusion. Affordability and accessibility are an integral, essential element of housing for families, students, older and disabled people. We believe the Housing Policy should be reassessed and amended to promote inclusion and to reconsider the breakdown of housing types.

All family housing needs to incorporate affordability, accessibility, and adaptability. This is not specifically addressed in HO1 and with reference to many other types of housing. We are concerned that HO1 puts so much emphasis on family housing in non city centre areas. There are many older and disabled people who would also need to live outside of the city centre.

Para. 4.15 states:

"In addition to this, there may be instances where alternative provision on the site could meet other aims of the City Council, such as provision for older and mobility impaired people including bungalows ..."

- The implication is that housing for older and disabled people is not family housing. Some older and disabled people will be living in families.

Policy HO3: Affordable Housing

This policy states:

"1. Planning permission for new residential developments including conversions, above a threshold of 15 dwellings, or 0.5 hectares (irrespective of dwelling numbers), will be granted subject to a target of 20% of new dwellings being developed for affordable housing, where appropriate."

We welcome the building of affordable homes; as is clear from the statistical information in the LAPP, EIA, there is a major need for affordable housing in Nottingham. Affordable housing should be available in all housing development schemes whatever the size/number of dwellings and a higher proportion of dwellings in each scheme need to be affordable - 20% is too low to meet identified need. We therefore propose that HO3 is amended to reflect this.

Policy HO4: Specialist and Adaptable Housing

This policy states:

"1. Planning permission for new residential development above a threshold of 10 or more dwellings will be granted subject to a target of at least 10% of new dwellings being developed as 'Accessible and Adaptable' dwellings."

It is very clear from the statistical information in the LAPP, LAPP EIA and Housing Nottingham Plan that there is an urgent need for accessible and adaptable housing in Nottingham. Many people become disabled as they get older and society is aging. Also, many younger disabled people are living longer, and with significant impairments.

"A recent Disabled People's Housing Needs Study* estimated an increasing number of people with physical disabilities in the city who need homes and facilities to meet their needs. By 2015 it is estimated that 1055 to 1197 households in the city with a disabled member will be in unsuitable accommodation with unmet needs and will require measures to be able to remain in their home or move to a suitable property."

*Disabled Housing Needs Study – An Assessment of the Housing Needs of People with Physical Disabilities. Nottinghamshire and Derbyshire Strategic Housing Local Authorities, Overarching Report, September 2012

Consequently, we believe that the target of 10% of dwellings built to Category 2 standard will not meet the needs of people in Nottingham who are currently disabled and older and will also not meet future needs.

4523 In order to provide for current identified need and to plan inclusively for future need, we believe that all new residential development schemes (where viable), whatever their size, should be built to Category 2 standard, with 10% being built to Category 3 standard. Leicester City Council has taken the decision to include 100% of new housing being built to Category 2 standard; why not Nottingham?

This principle is covered in the Justification section of this policy, although we believe that the percentages do not meet the City Council's commitment to its Duty of Care.

Para. 4.35 states: "The NPPF states that in order to create inclusive and mixed communities, local planning authorities should plan for a mix of housing based on the needs of different groups in the community. "

and

Para. 4.36 "Where possible, new residential accommodation should be adaptable to changes in individual circumstances. This can support independent living, personal wellbeing and ensure that new homes are fit to support a range of future needs. The City Council will require that a proportion of homes within new residential schemes meet the Category 2: Accessible and Adaptable standard of the Government's National Housing Standards."

We recognise that for some developments environmental conditions may make the provision of some accessible or adaptable housing difficult.

Policy HO5: Locations for Purpose Built Student Accommodation

4524 This section of the policy makes no reference to the need for student accommodation to be built to Category 1 (visitability) standard and there are no percentages requiring Category 2 (accessible and adaptable) or Category 3 (wheelchair accessible) dwellings. There are a growing number of students who need accessible or adaptable accommodation and in the interests of inclusion, should also be able to visit student friends or colleagues who are living in purpose built student accommodation.

Gill Street (South) was part of student accommodation built for Nottingham Trent University a couple of years ago. This five storey block only has lift access between the basement and podium/ground floors. This denies many disabled students from living in or visiting parts of the block above this level. In comparison, the recently rebuilt Byron House has lift access to all levels.

From the perspective of inclusion and independent living, it is very important that the Policy specifies that the majority of new build or refurbished student accommodation should be built to Category 2 accessible/adaptable standards.

4524 It is also essential to include parking provision in any new student accommodation, particularly for Blue Badge holders and other disabled students/visitors with mobility issues who need to use cars.

Policy DE1 Building Design and Use

In the justification, para. 4.79 states:
"New residential accommodation should be adaptable to changes in individual circumstances and the City Council will negotiate a proportion of such developments to be constructed to meet the Category 2: Accessible and Adaptable' standard of the Government's Housing Optional Technical Standards (subject to viability and feasibility)."

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Whilst we welcome the reference to a percentage of Category 2 dwellings, we are very concerned that there is no reference to a proportion of new build dwellings to Category 3 specification. Inclusion of these will ensure the option of wheelchair users having full access to independent living and accessible housing and save money in relation to further adaptations and pressure on the Disabled Facilities Grant.

Policy DE2 Context and Place Making

"Development proposals will be expected to:

- d) ensure streets are direct, integrated and safe, allowing for pedestrian and cyclist priority;
- e) ensure that the hierarchy of existing and proposed streets are legible and designed to enable easy navigation;"

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We welcome the approach set out in d) and e) above and supporting paragraphs 4.85 and 4.88, but it is important that guidance linked to these principles should highlight accessibility and safety issues for disabled, older and other vulnerable people. For example, the need for cycle paths to be clearly separated from footpaths, the dangers of shared space where it may not be clear for some disabled people and some drivers, who should have right of way, where there are vehicles turning or driving etc.

Policy DE3 Principles for Development within the City Centre Primary Shopping Area

This policy states:

"1. Within the City Centre Primary Shopping Area, development will be considered against the following criteria to ensure that its design helps to reinforce positive local characteristics within the Shopping Area and support its core retail function:

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- d) whether the proposal contributes towards the creation of an attractive, safe and inclusive pedestrian environment and wider public realm, that provides good accessibility, especially for people with disabilities, reinstating or introducing new pedestrian linkages where appropriate."

Whilst d) is a positive starting point for design and development, again as in DE2 and other parts of the LAPP, guidelines linked with the policy need to emphasise that there are access issues linked with large scale pedestrianisation. For example, the Market Square is an example of a large public space which is difficult to navigate by people with a visual impairment.

Policy DE6 Advertisements

Para. 4.109 states:

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"Freestanding advertisement boards may be acceptable provided that they constitute part of the overall scheme. Freestanding advertisements will not normally be granted consent because their low height and temporary nature are likely to cause clutter and are a danger to pedestrians, particularly to disabled people."

4528 - This paragraph seems to contradict itself. We suggest that it would make more sense if the second sentence came first.

Policy TR1: Parking and Travel Planning

This policy states:

"1. Proposals will be expected to include a sufficient package of measures to ensure that journeys by private car are minimised and journeys by sustainable modes are supported in line with the transport hierarchy within Policy 14 of the Core Strategy. Where necessary, planning obligations will be sought to support appropriate sustainable transport measures including walking, cycling, public transport and Smarter Choices packages."

This policy does not seem to address issues of inclusion for disabled people who cannot use public transport and are Blue Badge holders and this needs addressing in the final document.

4529 Para. 4.193 states "Proposals for new development will be expected to minimise the provision of car parking by design, for example, by providing shared use parking, and/or car-pooling as part a Travel Plan."

- This point should stipulate that shared parking and car pooling is not accessible for some disabled people, particularly wheelchair users. Some disabled people need the option of parking next to their dwellings. We therefore propose that it is amended to reflect this need.

Para. 4.194 states "... Limitation of the use of such car parks to serve only short and medium term visits is therefore considered necessary to achieve this balance."

- This paragraph does not cover the access needs of disabled people who are Blue Badge holders or need to use taxis to travel to any destination. We therefore propose that it should be amended to cover these issues.

Para. 4.196 states "Travel Plans are an effective tool in promoting sustainable transport modes and help reduce the need for car travel and associated parking. Transport Assessments and Travel Plans or Transport Statements will be requested for development depending on its anticipated scale and impact on the transport network in line with the Department for Transport's best practice guidance or subsequent national or locally derived standards. Where appropriate planning conditions and S106 agreements will be used to secure and implement Travel Plans."

- We propose that guidelines for developers who are producing Travel Plans should include advice on accessibility and inclusion for disabled people who need to use taxis or have a Blue Badge.

LAPP Equality Impact Assessment Feedback

4530 Section 2 of the EIA covers statistical information to inform the EIA and the LAPP. In Policy EE4 Local Employment and Training Opportunities, para. 3.72 of the LAPP gives figures about qualification levels the for 16-64 year olds. In order for this information to be more relevant and informative, we propose that a breakdown by disability, gender and race is included in the EIA or in that section of the LAPP. This information can then be used to inform the EIA analysis, policies and related action.

Whilst there are some positive elements of the EIA, there are several areas where there is inconsistency and where clearly some policies will have an impact on disabled and older people, although not always covered in the EIA.

4531 For example, creating employment opportunities is as much an issue for disabled people as it is for younger people those from the black minority ethnic community and women. This is

