

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY SUBCOMMITTEE ON 27 FEBRUARY 2019

PART A : REPORT

**SUBJECT: PROVISION OF ACCOMMODATION SUITABLE FOR OLDER PEOPLE
AND PEOPLE WITH DISABILITIES**

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DATE: 7 January 2019
EXTN: 37760
PORTFOLIO AREA: Planning

EXECUTIVE SUMMARY:

This report seeks approval for the Council to adopt the following recommendations as interim guidance on the provision of accommodation suitable for older people and people with disabilities.

RECOMMENDATIONS:

That the Planning Policy Sub Committee agrees the following:

- a) That the proposed standards for the provision of accommodation suitable for older persons and people with disabilities are approved for the purposes of consultation
- b) That appropriate consultation on the proposed standards be undertaken and any consultation responses reported back to the Sub Committee
- c) That the proposed standards for the provision of accommodation suitable for older persons and people with disabilities are treated as a material consideration in respect of the determination of all relevant planning applications
- d) That the Equality Impact Assessment at section 6 is noted.

1. BACKGROUND:

The Council adopted its Local Plan in July 2018. In due course a Design Guide will be produced to give more detailed effect to some of the policies of the Local Plan. However, in the meantime it is proposed that the Council should adopt the following as interim guidance on the provision of accommodation suitable for older people and people with disabilities.

The 2018 version of the National Planning Policy Framework contains the following guidance at paragraph 61:

“Within this context, the size, type and tenure of housing needed for different

groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes). (my emphasis)

In the Government's response to the Second Report of Session 2017-19 of the Housing, Communities and Local Government Select Committee inquiry into Housing for Older People the following comments were offered;

"We have strengthened national planning policy to reflect the importance of housing for older people. The revised National Planning Policy Framework was published on 24 July 2018 and sets out that plan making authorities are expected to have clear policies for addressing the housing needs of older and disabled people. The revised National Planning Policy Framework also includes a wider definition of older people in the glossary that includes those approaching, as well as over, retirement age. This will enable plan-making authorities to plan for the needs of people seeking to move to more suitable accommodation at an earlier age."

In the same document the Government offered the following guidance;

"The Government will continue to consider the range of housing available to older people, including new innovative models and those which support interactions across generations. We have made good progress to create options in new mainstream housing by developing a robust framework linking planning to building regulations. Every local authority can now plan to deliver housing that suits local need and viability. We have also introduced an optional technical standard into Building Regulations which gave local authorities a choice in that range between visitable dwellings, accessible and adaptable dwellings and wheelchair user dwellings. This took earlier independent Lifetime Homes guidance and embedded it as a broadly equivalent category of statutory guidance: Category 2 - M4(2). This can be applied as a planning condition, in a proportion that fits in with the local plan.

In contrast to new build homes, adapting existing homes relies on the home's fabric being suitable for adaptations. The built fabric of some houses will be unsuitable for the sorts of adaptation some people need, such as structural works to widen existing doors. Other homes will be very suitable to add extra steps, ramps and handrails or fit a level access shower room within an existing bathroom. Much depends on the existing building, but also the mobility and the degree of need for each resident. Building Regulations allow for all new homes to include a degree of access and adaptability suited to staying in a home for longer.

Local authorities can now evidence a need for more new accessible and adaptable properties in their area. When developing their local plan policies, each area has the means through planning and building regulations to ensure an appropriate supply of M4(2) Category 2: Access and adaptable dwellings and M4(3) Category 1:

Wheelchair user dwellings. The Government will be publishing further guidance shortly to accompany the revised National Planning Policy Framework on how local authorities should plan to meet the needs of older and disabled people.”

Members will be aware that over the coming months and years the Council is likely to receive numerous applications to deliver the required level of housing required by the Local Plan. Therefore, now is considered to be the right time to set out what the Council's expectations are as a starting point in negotiations on individual schemes.

Both the Select Committee report and the Government's response contain helpful observations on a range of other health matters relating to older people including loneliness and other initiatives aimed at allowing older people to live as independently for as long as possible. Consideration is being given to these matters as part of the process of assisting developers devise schemes which are likely to best meet the needs of the future population of Arun. However, in the context of this paper it is worth noting that barriers to accessibility, both within the home and in the local environment can increase a person's loneliness.

In the current Local Plan policy D DM1 addresses specific aspects of form and design quality. The policy states;

Policy D DM1

Aspects of form and design quality

When considering any application for development the Council will have regard to the following aspects.

5. Adaptability

Acknowledge diversity and difference. Buildings and places should be flexible to future adaption, including the changing needs of occupants (for example aging users, family circumstances), changes in wider work and social trends, and be able to accommodate potential differing uses of public space.

In addition policy D DM2 offers the following policy guidance on Internal Space Standards.

Policy D DM2

Internal Space Standards

The planning authority will require internal spaces to be an appropriate size ... to meet the requirements of all occupants and their changing needs. Nationally Described Space Standards will provide guidance.

Relevant extracts from the current National Planning Policy Guidance currently predate both the July 2018 version of the NPPF and the Select Committee report and Government response; hence there is some conflict between the guidance and commentary offered in

these documents. The proposed policy response for the Council is therefore based on the more recent documents.

To address this issue in the context of Arun it is firstly helpful to consider the need for such policy initiatives in Arun. The 'Updated Housing, Needs Evidence, Arun District Council, Final Report, September 2016' provides the following data and commentary.

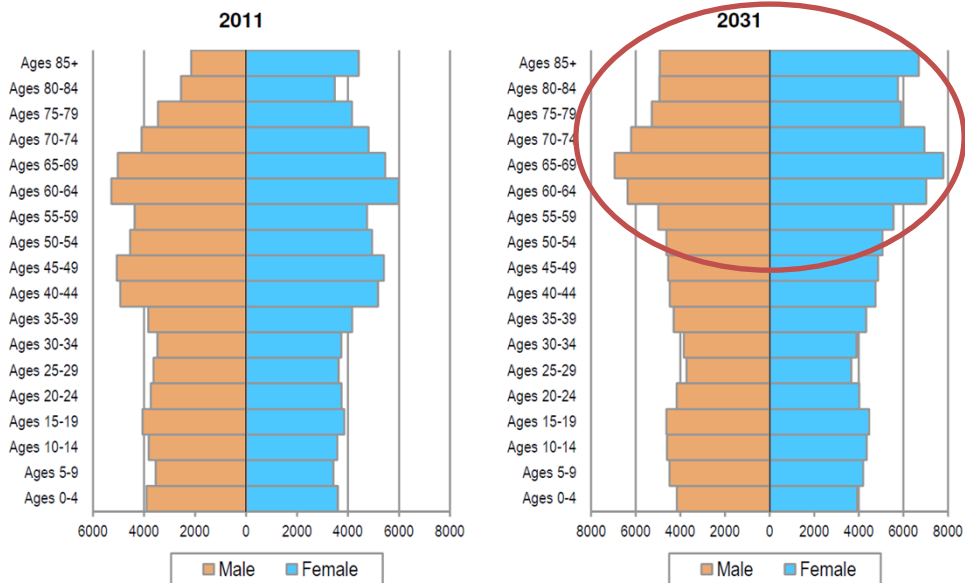
“1.8 The population of older persons is expected to grow significantly over the plan period, increasing by 55% (21,800 persons). A growing older population of older persons, particularly for those aged in their 70s, 80s and above, is projected to result in an increased need for specialist accommodation for older persons. This report identifies a need for 2,257 units of specialist accommodation over the plan period, such as sheltered or extra care provision. This is equivalent to 113 homes per annum, and equates to 12% of the overall housing need. The report recommends that broadly 60% of provision of specialist housing should be for market, and 40% for affordable housing.

1.9 In addition there is a need for 991 residential care/ nursing home bedspaces (an average of 50 per annum). This need is for C2 accommodation, and is separate and additional to the overall need / OAN for housing (for 18,380 dwellings). If provision of nursing/ care home bedspaces exceeds 50 per annum, it would be realistic to count the additional provision against the housing target on the basis of the general housing released.

5.6 Given the ageing population and higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist housing options moving forward.” (My emphasis)

The same document contains a number of useful tables and charts to explain the evolving situation in Arun. Firstly, figure 4 overleaf shows the substantial increase in people aged over 55.

Figure 4: Distribution of Population 2011 and 2031 (2014-based SNPP) – Arun



Source: ONS

This is reinforced by Table 7 below which shows that each five year band from 65 onwards is due to increase by 2031 by in excess of 40%

Table 7: Population Change 2011 to 2031 by five-year age bands – Arun

| Age group | Population 2011 | Population 2031 | Change in population | % change from 2011 |
|-----------|-----------------|-----------------|----------------------|--------------------|
| Under 5 | 7,499 | 8,086 | 587 | 7.8% |
| 5-9 | 6,965 | 8,690 | 1,725 | 24.8% |
| 10-14 | 7,396 | 8,961 | 1,565 | 21.2% |
| 15-19 | 7,916 | 9,082 | 1,166 | 14.7% |
| 20-24 | 7,478 | 8,187 | 709 | 9.5% |
| 25-29 | 7,262 | 7,394 | 132 | 1.8% |
| 30-34 | 7,216 | 7,740 | 524 | 7.3% |
| 35-39 | 8,005 | 8,635 | 630 | 7.9% |
| 40-44 | 10,116 | 9,231 | -885 | -8.8% |
| 45-49 | 10,485 | 9,410 | -1,075 | -10.2% |
| 50-54 | 9,490 | 9,692 | 202 | 2.1% |
| 55-59 | 9,117 | 10,546 | 1,429 | 15.7% |
| 60-64 | 11,262 | 13,384 | 2,122 | 18.8% |
| 65-69 | 10,492 | 14,732 | 4,240 | 40.4% |
| 70-74 | 8,904 | 13,156 | 4,252 | 47.7% |
| 75-79 | 7,606 | 11,179 | 3,573 | 47.0% |
| 80-84 | 6,038 | 10,688 | 4,650 | 77.0% |
| 85+ | 6,564 | 11,615 | 5,051 | 76.9% |
| Total | 149,811 | 180,407 | 30,596 | 20.4% |

Source: ONS

To put this into some form of context, Table 23 below from the same document shows that the percentage of people over the age of 65 in Arun is already 10% greater than the national picture at 28%.

Table 23: Older Person Population (2015)

| | | Under 65 | 65-74 | 75-84 | 85+ | Total | Total 65+ |
|-------------|-----------|----------|--------|--------|-------|---------|-----------|
| Arun | Popn | 111,736 | 22,548 | 14,636 | 6,812 | 155,732 | 43,996 |
| | % of popn | 71.7% | 14.5% | 9.4% | 4.4% | 100.0% | 28.3% |
| West Sussex | % of popn | 77.7% | 11.6% | 7.3% | 3.5% | 100.0% | 22.3% |
| South East | % of popn | 81.2% | 10.1% | 6.0% | 2.7% | 100.0% | 18.8% |
| England | % of popn | 82.3% | 9.6% | 5.7% | 2.4% | 100.0% | 17.7% |

Source: ONS 2015 Mid-Year Population Estimates

Table 24 below shows how this contextual situation is likely to change going forward.

Table 24: Projected Change in Population of Older Persons (2011 to 2031)

| | Under 65 | 65-74 | 75-84 | 85+ | Total | Total 65+ |
|-------------|----------|-------|-------|-------|-------|-----------|
| Arun | 8.0% | 43.8% | 60.3% | 76.9% | 20.4% | 55.0% |
| West Sussex | 6.7% | 49.1% | 58.7% | 83.0% | 17.4% | 57.9% |
| South East | 7.1% | 48.3% | 62.7% | 93.5% | 16.2% | 59.8% |
| England | 6.8% | 43.5% | 56.8% | 88.3% | 14.6% | 54.1% |

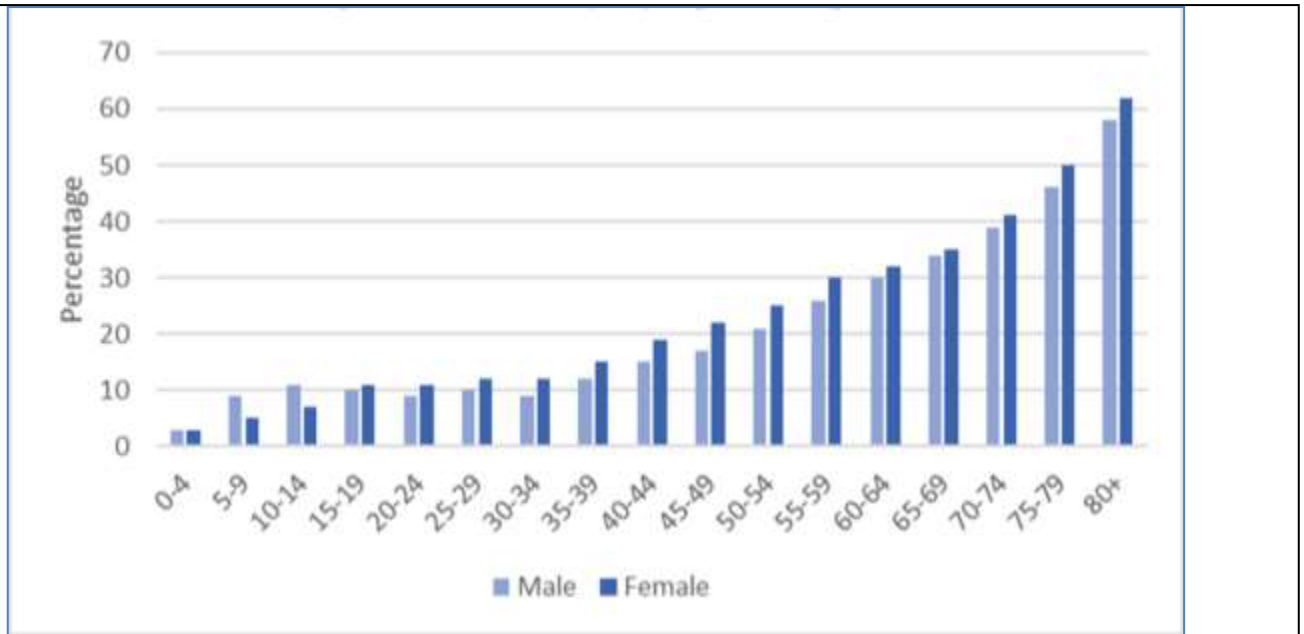
Source: ONS subnational population projections (2014-based) and MYE

According to the Centre for Ageing Better currently just 7% of homes in England are accessible meaning that 93% of homes don't provide reasonable provision for most people, which includes wheelchair users to access and enter the dwelling, and access habitable rooms and sanitary facilities on the entrance level.

Research by the LGA indicates that 21% of people in Arun have a limiting long-term illness or disability, which is higher than the national average of 18%. Additionally Government research in 2011-12 showed that nearly 30% of households have one person with a long term illness and over 3% have one or more wheelchair user.¹

The table overleaf shows the number of disabled people by age in the UK. It is clear with a high proportion of residents in Arun being above the age of 65, it is reasonable to assume that a high proportion of Arun residents will have a disability.

¹ As quoted in Eastleigh BC- Accessible housing and internal space standards background paper



Source: Family Resources Survey 2016/17 Table 4.3 (taken from the Independent Review of the Disabled Facilities Grant 2018)

Data from Department of Work and Pensions (Mar 2018) Family Resources Survey 2016/17 shows that the main types of disability for people of state pension age adults is mobility (65%+) followed by Stamina (45%+) and dexterity (35%+).²

In terms of the cost to the development industry the Centre for Ageing Better reports that an impact assessment carried out by the Government estimated that, in terms of the accessibility estimate and not including the cost of extra space, a three-bed property built to category 2 accessibility standards costs just £521 more in build costs and £866 more in access-related space cost than its less accessible version. A total of £1,387.

Applying the same approach to create a wheelchair accessible home the figures are £22,791 for build costs and £6,931 for access-related space cost than its less accessible version. A total of £29,722.

However, there is also the cost to the nation of not making adequate provision in terms of retrofitting accessibility features or causing people to require non independent care is substantially higher.

The Equality and Human Rights Commission estimate that the cost of an early move to a residential care home is £26,500 to £38,500 per annum; the same with nursing care is £34,500 to £54,000; whilst a single extra night in hospital due to temporary access needs not being met is £400. The cost of retrofitting an access ramp to a property is usually in excess of £1000.

² A person may have more than one disability

2. PROPOSAL(S):

Therefore in order to ensure that there is a reasonable level of provision in Arun for accessible and wheelchair friendly homes the standards below are recommended. To provide such context for these recommendations the following is a sample of what other authorities are doing. Members will note that there is a wide range of approaches. Consideration has been given to having a stepped approach for Arun to the implementation of these standards, with steps in 2022 and 2025. However, the vast majority of the development allocated in the Local Plan will be considered as formal planning applications before 2022, therefore rendering a stepped approach somewhat meaningless. Therefore, the recommended standard is a simplified one step approach to be applied immediately, with the weight that should be accorded to this policy increasing once the committee has had the opportunity to consider any responses to the consultation.³

Approach of Other Councils

| Authority | M4(2) Accessible Homes | M4 (3) Wheelchair Accessible Homes |
|---------------------|--|---|
| London Mayor | 90% | 10% |
| Hart | 15% on sites of more than 5 for market homes and 15% on schemes of 11 or more for affordable homes | Evidenced by local need |
| Eastleigh | 80% | On sites of greater than 40 units 8% of affordable units and 7% of market units |
| Colchester | 10% market housing and 95% affordable housing | 5% affordable homes |
| Waveney | Sites above 10 units – 40% | Unknown |
| Basingstoke & Deane | 15% | Unknown |
| Peterborough | 100% with certain exceptions | 5% on schemes of 50 units plus |

³ The standard will be applied at the time any application is determined

Finally, the Select Committee report commented on the ongoing popularity of bungalows and noted that:

“While better provision of advice and information about other housing options may encourage older people to consider alternative options, we believe that, given the enduring popularity of bungalows among older people and their accessibility features more councils and developers should consider the feasibility of building bungalows.”

Bungalows are traditionally ‘land hungry’ leading to low densities which requires more than to be provided for housing to achieve the same numbers that higher densities could deliver. However, there are an increasing number of examples of well-designed bungalow schemes at higher densities. Therefore recommendation 5 makes a positive statement encouraging developers to consider bungalow provision on larger schemes where the overall density can still be maintained relatively high.

Proposed Standards

- 1. For schemes of less than 10 units – no requirement**
- 2. For schemes of between 11 and 50 units inclusive – a minimum of 30% of units to be designed to m4(2) standard - Access and adaptable dwellings , plus two additional units to be designed to m4(3) wheelchair accessible, where the number of units proposed is greater than 21.**
- 3. For Schemes greater than 51 units inclusive – 50% of units to be designed to m4(2) standard- Access and adaptable dwellings, plus two additional units to be designed to m4(3) wheelchair accessible, for every 50 units proposed thereafter.**
- 4. The provision of these units should both be in the open market and affordable sectors**
- 5. Schemes larger than 100 units should make some provision for bungalows.**

NB. To illustrate the above the table below indicates the application of the standard to a range of developments

| Size of Development | M4(2) Accessible Homes | M4 (3) Wheelchair Accessible Homes |
|----------------------------|-------------------------------|---|
| 10 | None | None |
| 20 | 7 | none |
| 30 | 10 | 2 |
| 40 | 13 | 2 |
| 50 | 15 | 2 |

| | | |
|------------|-----------|----------|
| 60 | 30 | 4 |
| 70 | 35 | 4 |
| 80 | 40 | 4 |
| 90 | 45 | 4 |
| 100 | 50 | 4 |
| 110 | 55 | 6 |

3. OPTIONS:

At this time the proposal is to undertake consultation on the proposed standards so the main options are to undertake the consultation or not. Upon the receipt of any consultation responses the Council will have the opportunity to adopt the standards as currently proposed, amend them or decide not to adopt any standards at all.

4. CONSULTATION:

This will follow if the recommendations as set out above are agreed.

| Has consultation been undertaken with: | YES | NO |
|---|-----|----|
| Relevant Town/Parish Council | | x |
| Relevant District Ward Councillors | | x |
| Other groups/persons (please specify) | | x |
| 5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below) | YES | NO |
| Financial | | x |
| Legal | | x |
| Human Rights/Equality Impact Assessment | x | |
| Community Safety including Section 17 of Crime & Disorder Act | | x |
| Sustainability | | x |
| Asset Management/Property/Land | | x |
| Technology | | x |
| Other (please explain) | | x |

6. IMPLICATIONS:

The 'protected characteristics' defined in the Equality Act 2010 include both Age and Disability. The intended outcomes of this report are considered to have a positive impact upon these protected characteristics and are not considered to have a negative impact upon the remaining 'protected characteristics'.

7. REASON FOR THE DECISION:

The recommendations are intended to ensure that a reasonable proportion of new dwellings constructed in Arun, based on the needs of the area, are accessible to older people and those with disabilities and that an additional proportion are also accessible by those that need to use a wheelchair. This accords with the aims and intentions of the Local Plan and recent government advice.

8. BACKGROUND PAPERS:

<https://www.arun.gov.uk/planning-policy>