

1. Introduction

Purpose

- 1.1 This paper identifies the need for accessible housing in Hambleton, informing the Hambleton Local Plan policy that aims to meet this need of:

HG 2: Delivering the Right Type of Homes

- Supporting application of this policy
- Supporting the requirement for all new homes to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings', and for a proportion of new homes to meet requirement M4(3) 'wheelchair adaptable dwellings'
- Using available information and evidence to inform any changes that may be necessary for this policy and justification text to be clear and implementable

National policy context

- 1.2 Within the National Planning Policy Framework (2019) (NPPF)¹ section 5 addresses (or sets out) the objective of delivering a sufficient supply of homes. In this section paragraph 60 and 61 set out the expectations of local planning authorities:

60. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
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).

- 1.3 Further to this the NPPF, at paragraph 127 f), sets out that planning policies and decisions should ensure that developments:

- ...
f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

¹ NPPF <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

46: Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.

- 1.4 Further to this the Planning Practice Guidance (PPG) includes sections on, among other topics, identifying the housing requirements of older and disabled people², households with specific needs on accessible and adaptable housing, and internal space standards³.
- 1.5 In relation to housing for older people, the PPG states that Local Planning Authorities should:
- ...
- b. 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;
- ...
- e. identify particular types of general housing as part of their assessment.
- 1.6 In relation to households with specific needs, the PPG is less prescriptive in its requirements. It identifies several information sources 'about disabled people who require adaptations in the home, either now or in the future'. Unlike the guidance on housing for older people, it does not require local planning authorities to meet a specific target or have dedicated policy provision for disabled people, merely noting that 'if necessary, plan makers can engage with partners to better understand their housing requirements'.
- 1.7 This paper addresses the PPG sub-sections relating to housing for older people and households with specific needs, given that the needs of these groups and the related housing 'solutions' overlap in some ways; for example, housing that includes particular accessibility features will meet the needs of those people with a mobility restriction, regardless of age.

Terms used

Older people

- 1.8 The term 'older people', refers to the population aged 65+. This age threshold is used because much of the available population data is presented for age groups that are split to

² Paragraph: 002 Reference ID: 63-002-20190626 <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

³ <https://www.gov.uk/guidance/housing-optional-technical-standards>

cover people up to and including age 64 and those who are 65 or over. This is therefore a convenient threshold for describing the needs of older people as a group.

Lifetime Homes

- 1.9 The concept of Lifetime Homes was developed to ensure that homes are accessible and inclusive. It was developed in the early 1990s by the Helen Hamlyn Foundation, Habinteg Housing Association, and the Joseph Rowntree Foundation. The Lifetime Homes standard incorporates 16 design criteria that can be universally applied to new homes and had the flexibility to be adapted to meet the changing needs of individuals and families at different stages of life.

Wheelchair user dwelling

- 1.10 Before 2015 there was no singular wheelchair housing design standard. However, guides and examples of best practice existed such as the Habinteg Wheelchair Housing Design Guide. This guidance, currently on its third edition, provides guidance and good practice standards helping to deliver good quality wheelchair accessible housing.

Focus on independent living

- 1.11 North Yorkshire County Council (NYCC) is working to support people to live in their own homes and maximise their independence for as long as possible⁴. Within this strategy a range of housing options are supported with the aim of improving choice for those in need.
- 1.12 The theme of independent living particularly emphasises the need for self-contained housing which meets the needs of an ageing population in preference to institutional care.
- 1.13 The Equality and Human Rights Commission (EHRC) has identified that securing accessible housing and associated support is the foundation of independence for many disabled people, without which it is much harder to access employment, education, leisure and recreational opportunities often taken for granted by non-disabled people.

Other evidence

- 1.14 There have been calls to raise the minimum access standard to M4(2). The Women and Equalities Committee recommended this in its report 'Building for Equality: Disability and the Built Environment' in 2017⁵. The Royal Institute of British Architects (RIBA) published a report in July 2019⁶ which includes the recommendation that Government should make

⁴ North Yorkshire County Council, 2015. 2020 North Yorkshire Care and Support Where I Live Strategy [https://www.northyorks.gov.uk/sites/default/files/fileroot/Health%20and%20social%20care/Adult's%20social%20care/Care_and_support_where_i_live_strategy_\(apr_2015\).pdf](https://www.northyorks.gov.uk/sites/default/files/fileroot/Health%20and%20social%20care/Adult's%20social%20care/Care_and_support_where_i_live_strategy_(apr_2015).pdf)

⁵ <https://publications.parliament.uk/pa/cm201617/cmselect/cmwomeq/631/63102.htm>

⁶ RIBA, 2019. A Home for the Ages: Planning for the Future with Age-Friendly Design <https://www.architecture.com/-/media/GatherContent/Work-with-Us/Additional-Documents/11756-AgeFriendly-Report-FINALpdf.pdf>

M4(2) the basic requirement for all new housing, subject to specific exemptions where step-free access is not feasible.

- 1.15 The Government's forecasts in 2014/2015, supporting the introduction of optional technical standards, set out that with the use of M4(2) the proportion of homes built to the Lifetime Homes Standard was expected to increase from 31% in 2015 up to 45% by 2024. However, this is unlikely to be achieved; Habinteg, after assessing all 322 local plans from local planning authorities across England, found that most local plans have no specified requirement for a proportion of new homes to meet any accessible or adaptable housing standard⁷.

⁷ 'The Insight Report' (June 2019)

2. Optional Accessibility Standards in Hambleton: Evidence of Need

Introduction

- 2.1 This section provides evidence of need to apply the optional housing accessibility standards in Hambleton, and justifies the requirement within policy HG 2: Delivering the Right Type of Homes.
- 2.2 This section is set out as follows:

Background to the housing accessibility standards

- Explanation of some of the terms used;
- An introduction to the optional accessibility standards that can be required by Local Planning Authorities;
- What evidence is needed to justify such a requirement; and
- Why providing homes meeting the optional accessibility standards is an important way of meeting the needs of a changing population.

Local evidence for applying the optional accessibility standards in Hambleton

- Evidence of need for M4(2) Accessible and adaptable dwellings in Hambleton;
- Evidence of need for M4(3) Wheelchair user dwellings in Hambleton; and

Viability

- The part provides information about how the viability testing for the Local Plan took account of the proposed requirements for accessible homes.

Background to the housing accessibility standards

Terms used

- 2.3 Several different terms are used in this section which relate to disabilities, and to housing types addressing various disabilities. These are often linked to specific evidence sources that have used differing definitions.

Optional accessibility standards

- 2.4 This refers to M4(2) Accessible and adaptable dwellings and M4(3) Wheelchair user dwellings collectively. Definitions of these are set out below.

Accessible dwellings

- 2.5 This refers to dwellings with accessibility features, both in relation to the previous Lifetime Homes and Wheelchair Housing Design Guide standards and to current M4(2) Accessible and adaptable dwellings and M4(3) Wheelchair user dwellings. An example of where this is used is in Government evidence documents examining the potential benefits of M4(2) and M4(3) standards, where evidence relating to Lifetime Homes is used as a proxy for evidence relating to M4(2) and M4(3) standards.

What accessibility standards can be required?

- 2.6 Current national housing access standards are set out in Building Regulations Approved Document M: Volume 1 - Access to and Use of Dwellings, 2015 Edition. The table below sets out the three M4 standards. M4(1) is the mandatory standard that must be met by all housing and M4(2) and M4(3) are the two 'optional' standards that can be required.

Table 1: M4(1), (2) and (3) dwellings

1. M4(1) Category 1: Visitable dwellings is the mandatory baseline.

Whilst it offers some basic accessibility features (i.e door widths and corridors of a size suitable for a range of people including wheelchair users), it does not guarantee the visitability and adaptability that many households will need over their lifetimes, for example, level access into the dwelling is not always provided.

Requirements include:

- a. Within the curtilage of the dwelling or the building containing the dwelling, it is possible to approach and gain access to the dwelling.
- b. It is possible to gain access to the dwelling, or the building containing the dwelling, from the most likely point of alighting from a car.
- c. A disabled person who is able to walk is able to visit any dwelling in a building containing one or more dwellings.
- d. Visitors can access and use the habitable rooms and a WC within the entrance storey of the dwelling (or the principal storey where the entrance storey does not contain a habitable room).
- e. Where the habitable rooms and the WC are located on the entrance storey, access between them is step free.

f. Wall-mounted switches and socket outlets in habitable rooms are reasonably accessible to people who have reduced reach.

2. M4(2) Category 2: Accessible and adaptable dwellings

This level is very similar to the Lifetime Homes Standard, a flexible and adaptable standard offering enhanced access features and benefits to all households over their lifetime and over the lifetime of the home.

Requirements include:

- a. Within the curtilage of the dwelling, or of the building containing the dwelling, it is possible to approach and gain step-free access to the dwelling and to any associated parking space and communal facilities intended for the occupants to use.
- b. There is step-free access to the WC and other accommodation within the entrance storey, and to any associated private outdoor space directly connected to the entrance storey.
- c. A wide range of people, including older and disabled people and some wheelchair users, are able to use the accommodation and its sanitary facilities.
- d. Features are provided to enable common adaptations to be carried out in future to increase the accessibility and functionality of the dwelling.
- e. Wall-mounted switches, socket outlets and other controls are reasonably accessible to people who have reduced reach

3. M4(3) Category 3: Wheelchair user dwellings

This is broadly equivalent to Habinteg's Wheelchair Housing Design Guide (2nd edition), specifying accommodation to meet the needs of a household that includes a wheelchair user.

Requirements include:

- a. Within the curtilage of the dwelling or of the building containing the dwelling, a wheelchair user can approach and gain step-free access to every private entrance to the dwelling and to every associated private outdoor space, parking space and communal facility for occupants' use.
- b. Access to the WC and other accommodation within the entrance storey is step-free and the dwelling is designed to have the potential for step-free access to all other parts.
- c. There is sufficient internal space to make accommodation within the dwelling suitable for a wheelchair user.
- d. The dwelling is wheelchair adaptable such that key parts of the accommodation, including sanitary facilities and kitchens, could be easily altered to meet the needs of a wheelchair user or, where required by a local planning authority, the dwelling is wheelchair accessible.

Wall-mounted switches, controls and socket outlets are accessible to people who have reduced reach.

Within the M4(3) standard two sub-categories are available to specify:

- M4(3)a: wheelchair adaptable (meaning that they meet spacial and layout requirements but may not have been fully fitted and finished to accommodate immediate use by a wheelchair user)
- M4(3)b: wheelchair accessible (meaning that the dwelling is fully ready for occupation by a wheelchair user household).

2.7 The PPG states that Local Plans may only set district-wide policy requirements for a proportion of new homes to be wheelchair adaptable (M4(3)a). Local Plan policies for wheelchair accessible homes (M4(3)b) should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling⁸.

⁸ Paragraph: 009 Reference ID: 56-009-20150327 https://www.gov.uk/guidance/housing-optional-technical-standards#paragraph_009

For clarity, this section of the paper provides evidence for a policy requirement for a proportion of new homes to be wheelchair adaptable (a). It does not seek to evidence individual households' needs.

Accessible dwellings have multiple benefits

2.8 As noted above homes meeting the M4(2) accessible and adaptable dwellings standard include design features that enable the housing to be flexible enough to meet the current and future needs of most households. Such homes help meet the particular needs of those with restricted mobility, including older people and those with disabilities, and also families with young children who may need to manoeuvre buggies or children's equipment around⁹. Homes such as these are also visitable for people with restricted mobility.

2.9 Accessible dwellings, enabling residents to live independently in their own home for longer, provide a number of benefits in the following areas:

- **Personal health benefits:** Research¹⁰ modelling the potential cost savings of Lifetime Homes (roughly equivalent to M4(2) accessible and adaptable dwellings) indicates that the standards are likely to have a number of direct health benefits by reducing the likelihood of injuries. The areas of life where the likelihood of injury is expected to be reduced include:
 - Access
 - Falls on stairs
 - Falls on the level
 - Falls associated with baths
 - Personal hygiene
 - Ergonomics (relating to controls, fixtures and fittings)

The same study indicates that the standards are likely to have additional benefits for factors that can influence health and wellbeing indirectly:

- Increased independence
 - Reduced need for external assistance
 - Reduced stress-related illnesses
 - Reduced fear of crime
 - Improved psychological wellbeing
 - Creates stable communities
- **Personal psychological benefits:** Accessible dwellings enable older and disabled people to visit and stay with friends and family, thereby supporting informal care networks and social inclusion, and helping to prevent loneliness¹¹.

⁹ GLA, 2006. Accessible London: achieving an inclusive environment: Lifetime Homes

¹⁰ DCLG. 2012. Assessing the health benefits of Lifetime Homes

¹¹ DCLG, 2008. Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society

- **Social cost benefits:** The Housing Standards Review – Final Implementation Impact Assessment¹² identified several personal, public health and social care cost savings of providing more accessible housing, primarily through reduced cost:
 - of and need for care assistance in the home
 - to the health service arising from unsuitable housing and including trips, falls and injury to carers
 - of, or need for, adaptations
 - of removing adaptations
 - in administration of re-housing older or disabled people
 - for residential care by delaying long term need to move into care accommodation
 - by enabling return from hospital

It also identified reduced bed blocking in primary health care due to inappropriate housing preventing the return home for a patient.

- 2.10 The Foundations report¹³ found that the average Disabled Facilities Grant to adapt a M4(1) home was £7,000 (one-off payment) and that residential care costs if a person's home becomes unsuitable were an average of £29,000 per year.
- 2.11 The above-mentioned research modelling of the potential cost savings of Lifetime suggests that the cost saving to society over a 60-year building lifespan of a dwelling built to that standard, compared to the average for the current housing stock, could be £1,600. Dwellings meeting Lifetime Homes standards, and M4(2) requirements, are accessible to a wide range of occupants, but also include features which enable common adaptations to be carried out in future to increase the accessibility and functionality of the home. If these further potential adaptations were made, the research calculated the cost savings to society could be £8,600 over a 60-year building lifespan.

Addressing PPG: What evidence should local planning authorities use to demonstrate a need to set optional accessibility, adaptability and wheelchair housing standards?

- 2.12 The PPG states that local planning authorities can decide how to approach demonstrating the need for requiring M4(2) accessible and adaptable dwellings, and/ or M4(3) wheelchair user dwellings, based on their housing needs assessment and other available datasets¹⁴.
- 2.13 Local planning authorities can consider a wide range of published official statistics and factors, including:

¹² DCLG, 2015. Housing Standards Review – Final Implementation Impact Assessment, para 252

¹³ Foundations, 2015. Linking Disabled Facilities Grants to Social Care Data: A Freedom of Information Survey <http://foundationsweb.s3.amazonaws.com/4210/foundations-dfg-foi-report-nov-2015.pdf>

¹⁴ Paragraph: 007 Reference ID: 56-007-20150327 https://www.gov.uk/guidance/housing-optional-technical-standards#paragraph_007

- 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; and
- the overall impact on viability.

2.14 To assist local planning authorities in appraising data the Government has produced a summary data sheet¹⁵. This paper considers the evidence factors identified in the list above, using several of the data sources identified in the Government data sheet, as well as other sources that are considered relevant. A full list of sources used is included at Appendix A: List of sources used.

Why providing dwellings meeting the optional accessibility standards M4(2) and M4(3) is an important way of meeting the needs of a changing population

Existing housing stock is not accessible.

2.15 Detailed information about the housing stock in Hambleton is not available. However, information for England as a whole is available in the English Housing Survey (EHS)¹⁶. There is likely to be a small variation between Hambleton and the national picture, but this is likely to be limited so the data is considered to be applicable.

2.16 The ‘visitability’ of homes for the EHS was based on four key accessibility features which are the most important for enabling people with impaired mobility to either access their home or visit someone else’s home:

1. Level access;
2. Flush threshold (a wheelchair can be wheeled directly into the dwelling from outside the entrance door with no steps to negotiate and no obstruction higher than 15mm);
3. Sufficiently wide doors and circulation space;
4. WC at entrance level.

2.17 These four features form the basis for the requirements in part M of the Building Regulations, although the EHS cannot exactly mirror the detailed requirements contained in the regulations.

2.18 The EHS data shows that only 7% of homes in England are fully visitable for those with restricted mobility.

¹⁵ MHCLG, 2015. Building regulations: guide to available disability data, <https://www.gov.uk/government/publications/building-regulations-guide-to-available-disability-data>

¹⁶ DCLG, 2016. English Housing Survey 2014 to 2015: adaptations and accessibility of homes report, <https://www.gov.uk/government/statistics/english-housing-survey-2014-to-2015-adaptations-and-accessibility-of-homes-report>

2.19 Adaptations to existing stock not already fully visitable are often not practically or financially feasible. The data shows that of all homes surveyed that were not already fully 'visitable', more than a quarter (28%) could not practically be made visitable.

Table 2: Estimates of work needed to make homes in England fully visitable

| Proportion of all homes in England not already fully visitable | Description of work to make the home fully visitable |
|--|--|
| 12% | Minor work |
| 45% | Moderate work |
| 15% | Major work |
| 28% | Not feasible to make fully visitable |

Source: DCLG, 2016. English Housing Survey Adaptations and Accessibility Report

<https://www.gov.uk/government/statistics/english-housing-survey-2014-to-2015-adaptations-and-accessibility-of-homes-report>

2.20 The data from the EHS shows that the issue of homes not being fully visitable is an issue that affects homes of all tenures. The table below sets out the work required by tenure of property.

Table 3: Level of work required to make dwellings fully 'visitable' by tenure (England)

| Tenure | Minor work only | Moderate work only | Major/problematic | Not feasible | Already fully visitable |
|---------------------|-----------------|--------------------|-------------------|--------------|-------------------------|
| Owner occupied | 13% | 47% | 12% | 24% | 5% |
| Private rented | 8% | 31% | 18% | 35% | 8% |
| Local authority | 8% | 39% | 25% | 21% | 7% |
| Housing association | 8% | 34% | 16% | 23% | 18% |

Source: DCLG, 2016. English Housing Survey Adaptations and Accessibility Report

<https://www.gov.uk/government/statistics/english-housing-survey-2014-to-2015-adaptations-and-accessibility-of-homes-report>

2.21 From this table we can see that for example, for private rented dwellings, 16% are already fully visitable or would require only minor work to make them fully visitable, 49% would require moderate or major work to make them fully visitable, but 35% could not feasibly be made fully visitable. In contrast, for housing association dwellings, 26% are already fully visitable or would require only minor work, 64% would require moderate or major work, and only 23% could not feasibly be made fully visitable.

2.22 Applying these proportions to the 2011 tenure split in Hambleton shows that there are low numbers of accessible homes across all tenures. The greatest need for accessible and adaptable homes (due to the lack of fully visitable homes) is not in the affordable housing sector, but in the owner occupied and private rented sector. Given this, it is clear that any Local Plan policy requiring new dwellings to meet the optional accessibility requirements of M4(2) should apply to all housing, both private and affordable.

Table 4: Estimated level of work required to make dwellings fully 'visitable' by tenure in Hambleton

| Tenure | Minor work only ¹ | Moderate work only ¹ | Major/problematic ¹ | Not feasible ¹ | No work needed as dwelling already fully visitable ¹ | Total households |
|------------------------------|------------------------------|---------------------------------|--------------------------------|---------------------------|---|------------------|
| Owner occupied | 3,544 | 12,815 | 3,272 | 6,544 | 1,363 | 27,268 |
| Private rented | 461 | 1,788 | 1,038 | 2,019 | 461 | 5,770 |
| Local authority ² | 0 | 0 | 0 | 0 | 0 | 0 |
| Housing association | 406 | 1,727 | 816 | 1,168 | 914 | 5,079 |
| Totals | 4,411 | 16,330 | 5,126 | 9,731 | 2,738 | 38,117 |

Source: DCLG, 2016. English Housing Survey Adaptations and Accessibility Report

<https://www.gov.uk/government/statistics/english-housing-survey-2014-to-2015-adaptations-and-accessibility-of-homes-report> and [Census 2011](#)

1. numbers are not exact as they are calculated using percentages from table 3
2. Hambleton District Council transferred its local authority rented stock to housing associations prior to 2011 so households shown in the Census as living in local authority dwellings are attributed to housing associations.

Cost of work

2.23 The cost of the work that would be required to make homes visitable is potentially substantial. The table below sets out the costs that the EHS identified for completion of required works.

Table 5: Cost of required work to make the home fully visitable

| Description of work to make the home fully visitable | Cost |
|--|-------------------|
| Minor work | <£1,000 |
| Moderate work | £1,000 to £15,000 |
| Major work | >£15,000 |
| Not feasible to make fully visitable | N/A |

Source: DCLG, 2016. English Housing Survey Adaptations and Accessibility Report

2.24 Across all tenures 60% of homes would require work costing £1,000 or more. This rises to 65% for local authority housing.

Specialist housing should not and cannot meet all of the growing accommodation needs of older people

- 2.25 Most older people currently live in mainstream housing, rather than in specialist accommodation. Currently in the whole of Britain 90% of older people live in general housing, 6% in some form of sheltered housing and 4% in residential institution settings. Development of specialist housing for older people is a growing sector, but for the foreseeable future most older people will continue to live outside of specialist housing.
- 2.26 The agenda that has prevailed for some time for health and social care, affecting future provision of care, promotes independent living rather than institutional care, aiming to enable people with health and social care needs to remain in mainstream housing⁴. This emphasises the need for self-contained housing which meets the needs of an ageing population, in preference to institutional care. It is therefore reasonable to expect that mainstream housing should be capable of meeting the needs of this group.
- 2.27 Combined with the predicted increase in the numbers and proportion of the population aged 65 and over it is clear that an increase in accessible housing is required across all tenures and types of homes.

Local evidence for applying housing accessibility standards in Hambleton

Evidence of need for M4(2) Accessible and Adaptable dwellings in Hambleton

2.28 As noted above M4(2) dwellings meet the needs of a diverse range of people, including people with restricted mobility of all ages, both older people and those of working age, as well as families with young children. The diversity of needs within these groups makes it difficult to calculate a requirement for a specific proportion of new housing to meet M4(2) standards based upon a single evidence source. However, identifying at least an estimate of the scale of need is helpful in justifying policy requirements.

Calculated evidence approach

- 2.29 As noted above, this approach assumes that all households aged 65+ would benefit from a dwelling meeting the M4(2) Accessible and Adaptable standard. The main justification for this assumption is that it helps cater for the needs of any long-term health problems associated with ageing. It is true that not everyone aged 65+ will need such housing at any point in their lifetime. However, as we age an increasing proportion of us will have a long-term health problem or disability.
- 2.30 Table 50 of the SHMA (January 2016) indicates that the number of residents aged 65 and over across the district is projected to increase by 52.5% over the 2014 -2035 period. Within this growth there is an expected 167.6% increase in the most elderly 85+ cohort, as a result of a growing older population and increasing life expectancy. This would equate to an increase in 11,279 people aged 65 and over for the plan period.
- 2.31 Linked to this growth, Table 51 of the SHMA suggests the number of older people with mobility problems will increase by 3,093 by 2035 which is around 80.2%. It also highlights a projected increase of 104.7% in persons with dementia.
- 2.32 While the growth in the elderly population along with the growth in other conditions does not directly translate into a need for specific levels of M4(2) properties the scale of growth justifies the Council seeking 100% of new homes to be M4(2) compliant where this is viable. Although it is recognised that some developments, because of their built form and/or topography, may not be suitable for this type of development.
- 2.33 By providing as much M4(2) compliant homes as viable will allow people to live in their homes for longer. This will in turn slow the demand for specialist accommodation which is less cost effective to the public purse than the estimated £1,400 per unit¹⁷ required to make new homes M4(2) compliant.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/930274/200813_con_doc_-_final_1_.pdf

Further evidence supporting a requirement for M4(2)

Adults of working age with disabilities

2.34 Table 53 from the SHMA shows that the estimated change in the population with a long-term health problem or disability (LTHPD) is expected to increase from 15,831 in 2014 to 22,025 in 2035. This is an increase of 6,194 or just over 39%.

Families

2.35 A significant proportion of Hambleton households comprise families with children. In 2011, 9,508 households in Hambleton comprised a family with one or more dependent children¹⁸. This is approximately 25% of all households in the district. Projections suggest that the proportion of total households comprising one or more dependent children will fall over the plan period. However, there will be an overall growth in the number of such households.

Those in need of affordable housing

2.36 Information from the Housing Register from January 2021 shows that there are currently 1,139 active applications. Of these some applicants have self-identified that they have a disability:

- Autistic = 9
- Hearing impairment = 11
- Learning disability = 17
- Mental Health = 152
- Mobility = 101
- Progressive disability / chronic illness = 67
- Visual impairment = 5
- Does not wish to disclose = 22
- Other = 42

2.37 While there is some double counting in these figures it is clear that those with disabilities make up a sizeable proportion of applicants. For example, those identifying as having a mobility disability make up approximately 9% of all applicants.

2.38 Applicants who have stated that they require adaptations consist of:

- Level access shower or wet room, ramped or level access accommodation & wheelchair adapted = 10
- Level access shower or wet room & ramped or level access accommodation = 27
- Level access shower or wet room = 66
- Ramped or level access accommodation = 9

2.39 This shows that nearly 10% of applicants need some form of adaptation.

¹⁸ Census 2011. QS113EW - Household composition - Households

Conclusion

- 2.40 Taken together, the calculated evidence approach and further evidence provide justification for including a Local Plan policy requirement for a very high proportion of new homes to meet M4(2) Accessible and Adaptable standards. The calculated approach in particular indicates a compelling case for seeking M4(2) compliance for all new homes.

Evidence of need for M4(3) wheelchair adaptable dwellings in Hambleton

- 2.41 Information about the need for housing for wheelchair users is difficult to obtain, particularly at a local level and estimates of need produced in this report draw on data from the English Housing Survey (EHS) which provides a range of relevant data, but often for different time periods.
- 2.42 The EHS data we have drawn on includes the age structure of wheelchair users, information about work needed to homes to make them 'visitable' for wheelchair users and data about wheelchair users by tenure.
- 2.43 The analysis below sets out estimates of the number of wheelchair users in the District; this is based on estimating prevalence rates from the 2011-12 EHS (Annex Table 6.11) combined with Census data. At the time, the EHS showed there were 184,000 households where the oldest person in the household was aged under 60 and it contained a wheelchair user; the 2011 Census showed around 40.6 million people aged under 60 and therefore a base prevalence rate of 0.005 has been calculated for this group (0.5%) – essentially for every 1,000 people aged under 60 there are around 5 wheelchair user households.
- 2.44 The table below shows data for a full range of age groups; it should be noted that whilst the prevalence rates mix households and population they will provide a reasonable estimate of the number of wheelchair user households as there are very few households with multiple wheelchair users.

Table 6: Baseline prevalence rates by age used to estimate wheelchair user households – data for England

| | Number of wheelchair user households | Household population | Prevalence (per 1,000 household population) |
|-------------------------|--------------------------------------|----------------------|---|
| Under 60 years | 183,938 | 40,562,374 | 5 |
| 60 - 74 years | 204,822 | 7,668,495 | 27 |
| 75 - 84 years | 191,249 | 2,831,815 | 68 |
| 85 years or over | 145,842 | 997,247 | 146 |

Source: Derived from EHS (2011-12) and 2011 Census

- 2.45 The analysis also considers the relative health of the population of Hambleton. For this, data has been taken from the 2011 Census for the household population with 'day to day activities limited a lot' by their disability (Table DC3302EW). The table below shows this information by age in both Hambleton and England, and also shows the adjustment made to reflect differences in health between the areas.
- 2.46 Due to the age bands used in the Census, there has been some degree of adjustment for the under 60 and 60-74 age groups. The data shows lower levels of disability for all age groups in the district in comparison to England, pointing to a slightly lower than average proportion of wheelchair user households.

Table 7: Proportion of people with day-to-day activities limited a lot (by age) – 2011

| | % of age group with day-to-day activities limited a lot | | Hambleton as % of England | Prevalence rate (per 1,000 population) |
|-------------------------|---|---------|---------------------------|--|
| | Hambleton | England | | |
| Under 60 years | 2.9% | 4.2% | 70.8% | 3 |
| 60 - 74 years | 9.2% | 13.9% | 65.7% | 18 |
| 75 - 84 years | 23.7% | 29.1% | 81.3% | 55 |
| 85 years or over | 48.1% | 52.3% | 91.8% | 134 |

Source: 2011 Census

2.47 The local prevalence rate data can be brought together with information about the population age structure and how this is likely to change moving forward. The data estimates a total of 1,213 wheelchair user households in 2014, and that this will rise to 2,130 by 2036 (an increase of 918).

Table 8: Estimated number of wheelchair user households (2014-36) – Hambleton

| | Prevalence rate (per 1,000 population) | Household population 2014 | Household population 2036 | Wheelchair user households (2014) | Wheelchair user households (2036) |
|-------------------------|--|---------------------------|---------------------------|-----------------------------------|-----------------------------------|
| Under 60 years | 3 | 60,663 | 62,542 | 195 | 201 |
| 60 - 74 years | 18 | 18,059 | 21,052 | 317 | 370 |
| 75 - 84 years | 55 | 6,860 | 11,491 | 377 | 631 |
| 85 years or over | 134 | 2,415 | 6,919 | 324 | 929 |
| Total | | 87,997 | 102,004 | 1,213 | 2,130 |

Source: Derived from a range of sources

2.48 The finding of an estimated current number of wheelchair user households does not indicate how many homes might be needed for this group – some households will be living in a home that is suitable for wheelchair use, whilst others may need improvements to accommodation, or a move to an alternative home.

2.49 Data from the EHS (2014-15) shows that of the 814,000 wheelchair user households, some 200,000 live in a home that would either be problematic or not feasible to make fully 'visitible' – this is around 25% of wheelchair user households.

2.50 Applying this to the current number of wheelchair user households and adding the additional number projected forward suggests a total need for 1,216 additional wheelchair user homes in the 2014-36 period – this equates to 17.5% of all housing need (as set out in the table 9 below).

2.51 However, it should be acknowledged that this approach assumes that it will be possible to apply a requirement to all housing need. As can be seen from the recently published Housing Supply Updated Position document (L019) most of the housing need will be met through development of sites that already have the benefit of planning permission. That document identifies the possibility of some 3,200 homes coming from future windfall sites

(although significant caution should be used as future windfall sites may not come forward in the same way). Added to the 627 homes from local plan allocations, an estimate of the number of homes that a requirement could be applied to is somewhere in the region of 3,800 homes, substantially less than the housing need figure.

Table 9: Estimated need for wheelchair user homes, 2014-2036

| | Current need | Projected additional need (2014-36) | Total current and future need | Housing need (2014-36) | % of housing need |
|------------------|--------------|-------------------------------------|-------------------------------|------------------------|-------------------|
| Hambleton | 298 | 918 | 1,216 | 6,930 | 17.5 |

Source: Derived from a range of sources

- 2.52 Furthermore, information in the EHS (for 2017/18) also provides national data about wheelchair users by tenure. This showed that, at that time, around 7.1% of social tenants were wheelchair users, compared with 2.7% of market households (owner-occupiers and private renters) – a total of 3.5% of all households contained a wheelchair user.
- 2.53 The analysis above shows (for the District) moving forward to 2036 that there is a need for 17.5% of additional dwellings to be suitable for wheelchair users – this is about 5 times higher than the current number of users (at a national level).
- 2.54 In looking at a future tenure split, it can therefore be estimated that the proportion of wheelchair user households in both market and affordable tenures will also be around 5 times higher than the current proportions. Hence the need for market wheelchair user housing is around 14% (2.7% times 5) and a figure of 36% in the affordable sector (7.1% times 5).

Table 10: Estimated need for wheelchair user homes by tenure, 2014-2036

| | Market | Affordable |
|------------------|--------|------------|
| Hambleton | 14% | 36% |

Source: Derived from a range of sources

Conclusions

- 2.55 To meet the identified need the council should seek 14% of all new market homes to be M4(3) compliant and 36% in the affordable sector. Not all sites would be able to deliver homes of this type due to the settlement built-form, topography, flooding risk etc. Therefore, higher percentages could be sought in order to be sure of meet the need. In the market sector these homes would be M4(3)a (adaptable) and M4(3)b (accessible) for affordable housing (see table 1 above).
- 2.56 It is worth noting that the Government is currently consulting on changes to the ways in which the needs of people with disabilities and wheelchair users are planned for as a result of concerns that, in the drive to achieve higher housing numbers, the delivery of housing

that suits the needs of households (in particular those with disabilities) is being compromised on viability grounds¹⁹.

- 2.57 One of the policy options in this consultation document is to remove M4(1) altogether, so that all new homes will have to at least have the accessible and adaptable features of an M4(2) home. M4(3) would apply where there is a local planning policy in place in which a need has been identified and evidenced.
- 2.58 This is consistent with the evidence presented in this report, although the trade-off identified in the consultation paper between viability and the need to deliver sufficient numbers of market homes to meet general housing needs is unavoidable.

¹⁹ Raising accessibility standards for new homes, a consultation paper, page 10

Viability

What did the Whole Plan Viability Study test?

2.59 Table 3.14 of the Whole Plan Viability Assessment (2019)²⁰ sets out the key policy requirements used to test the viability of development. This includes the requirement for the optional accessibility standards. The table states:

‘We have assumed that all of the dwellings in each scheme that is tested will comply with M4 (2) ‘accessible and adaptable dwellings’ standards.

For large scale development proposals of 200 dwellings or more, we have assumed that 9% of the market housing and 30% of the affordable housing will meet the requirements of M4 (3)a including further design features so that homes are capable of meeting or being adapted to meet the needs of most wheelchair users.’

2.60 The details of the costs associated with meeting the accessibility standards are set out in Appendix A of the assessment. The costs identified for M4(2) were £1,100 per house and £750 per apartment, and for M4(3)a £5,500 per house. These costs are similar to, but slightly lower than, those identified by Government in the Housing Standards Review Cost Impacts²¹.

2.61 In relation to testing of the requirement for all homes to meet M4(2) the assessment stated that:

‘The results of this testing show the impact of this requirement is a reduction in the level of surplus of between £10 and £14 per sq.m. This is not material and these standards can generally be supported.’

2.62 In relation to the requirement for a proportion of homes to meet M4(3) the assessment stated that:

‘The additional requirements to achieve M4(3a) on developments over 200 dwellings increase the viability impact with a reduction in the surplus of around £21 per sq.m.’

2.63 The conclusions of the viability assessment were that testing for generic sites demonstrates that greenfield sites across the market towns are viable based on the cumulative plan policy requirements and that the respective allocations in these locations are also viable.

2.64 The testing of generic brownfield typologies shows that they have more limited viability with higher land costs. The assessment acknowledged that no allocations were proposed on brownfield sites. While the results for Inner Northallerton show that at development densities of 35 dwellings per hectare (dph) the majority of sites could support 20% affordable housing together with cumulative plan requirements. However, the council

²⁰ HDC, 2019. Whole Plan and Community Infrastructure Levy Viability Assessment. (SD01)

<https://www.hambleton.gov.uk/downloads/download/225/local-plan-submission-supporting-documents>

²¹ DCLG, 2014. Housing Standards Review Cost Impacts

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/353387/021c_Cost_Report_11th_Sept_2014_FINAL.pdf

considers it unlikely that urban brownfield sites in Northallerton would come forward at densities as low as 35dph and so development that complies with the all policy requirements could be viable.

- 2.65 It is worth noting that there seems to be very little in the way of calculation about whether homes that meet the M4(2) or M4(3) standards would command a premium when sold in any of the evidence reviewed. Given the very low proportion of existing homes that meet equivalent standards and the levels of need it would be hard to assume that there would be no difference in price.

3. Conclusions

- 3.1 This paper considers the evidence available to support the requirement in policy HG 2: Delivering the Right Type of Homes for new homes to meet the optional accessibility standards M4(2) and M4(3).
- 3.2 The calculated and broad approaches used to establish evidence for applying M4(2) to new homes identifies justification for all new homes to meet this standard.
- 3.3 The calculated and broad approaches used to establish evidence for applying M4(3) to new homes identifies justification for seek 14% of all new market homes and 36% in the affordable sector.
- 3.4 The evidence from the local plan viability testing concludes that development is viable if seeking:
 1. 100% of homes meet M4(2); and
 2. for sites of 200 dwellings or more, 9% of the market housing and 30% of the affordable housing will meet the requirements of M4(3)a.
- 3.5 Despite the evidence of need for a significant percentage of homes to meet M4(3) the council considers that the costs involved with meeting this standard as set out in the viability testing are significant. As such it is considered appropriate for policy HG 2 be clarified in seeking all homes meet the M4(2) standard and that on sites of 200 or more homes 9% of market homes and 30% of affordable homes meet the M4(3) standard.
- 3.6 In recognition of the evidence of need for M4(3) it is also considered appropriate for policy HG 2 to clarify the specific type of M4(3) homes being sought; M4(3)a compliant homes for market properties and M4(3)b²² for affordable homes (subject to be restriction regarding responsibility for allocation/nomination).
- 3.7 Further, it is considered appropriate for the policy to be amended so that it is supportive of the provision of homes that meet the M4(3) standard being provided on sites below 200 homes and that the council will work with developers/providers to achieve such provision.

²² See Table 1 above

Appendix A: Sources used

Census 2011. Table KS401EW - Dwellings, household spaces and accommodation type
www.nomisweb.co.uk

Census 2011. Table QS113EW - Household composition – Households www.nomisweb.co.uk

Census 2011. Table DC3404EW - General health by long-term health problem or disability by occupancy rating (bedrooms) by age www.nomisweb.co.uk

Census 2011, Table QS405EW - Tenure – Households www.nomisweb.co.uk

Census 2011, Table QS404EW - Tenure - Household Reference Person aged 65 and over.
www.nomisweb.co.uk

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