# **Ipswich Borough Council Local Plan**

Background to the proposed requirement for accessible and adaptable dwellings and wheelchair user dwellings (Policy DM5)

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### Context

- 1.1 This note sets out the justification for the introduction of a requirement for accessible and adaptable dwellings and wheelchair user dwellings within Ipswich Borough. Policy DM5 of the adopted Core Strategy and Policies DPD (2011) contains a requirement within policy DM5 for buildings that are: 'highly sustainable and are designed for long life by being capable of adaptation to accommodate changing needs and uses over time.' The supporting text referred to Lifetime Homes as a possible way of achieving this requirement.
- 1.2 Following the publication of the Planning Update Ministerial Statement in March 2015, local planning authorities may now only require enhanced accessibility through reference to the new Building Regulations standards Part M4(2) and Part M4(3).
- 1.3 A dwelling built to Part M4(2) is one which makes 'reasonable provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants including older people, those with reduced mobility and some wheelchair users'. A dwelling built to Part M4(3) is one which makes 'reasonable provision, either at completion or at a point following completion, for a wheelchair user to live in the dwelling and use any associated private outdoor space, parking and communal facilities that may be provided for the use of the occupants'.

### **National Policy**

- 2.1 The National Planning Policy Framework (NPPF) states that planning authorities should 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own home' (paragraph 50). The NPPF also states that 'The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities' (paragraph 69).
- 2.2 In March 2015, the Government published a ministerial statement which stated that requirements for accessible dwellings should only be set in relation to the new national optional standards which have been introduced as Part M4(2) and Part M4(3) of the Building Regulations. The adopted Ipswich Core Strategy and Policies development plan document contains a requirement for homes to be 'capable of adaptation to accommodate changing needs and uses over time' under policy DM5. However, following the introduction of the ministerial statement, the guidance in which has been taken forward into revised planning practice guidance, the Council must review its policy.
- 2.3 The Planning Practice Guidance states that the following should be taken into account when identifying the need for accessible dwellings:
  - The likely need for future housing for older and disabled people (including wheelchair user dwellings);
  - Size, location, type and quality of dwellings needed (for example retirement homes, sheltered homes or care homes);
  - The accessibility and adaptability of the existing housing stock;
  - How needs vary across different housing tenures;
  - The overall impact on viability.

- 2.4 These are considered in the analysis below. To assist local planning authorities in taking the above into account, the Planning Practice Guidance also includes a data sheet which contains a number useful data sources, some of which have been used in this analysis.
- 2.5 Initially it should be noted that there is no precise forecast of the need for accessible dwellings. An appropriate requirement for Ipswich has been identified through consideration of a number of statistics and projections.

## **Local Policy**

- 3.1 The proposed policy approach would make an important contribution to local health, housing and social care strategies.
- 3.2 The Suffolk Health and Wellbeing Strategy<sup>1</sup>, which the Borough Council supports, includes four strategic outcomes. One strategic outcome is to ensure that older people have a good quality of life, and suitable housing can play an important role in implementing this objective, particularly in respect of reducing hospital admissions and enabling older people to remain settled in their own communities. There is also a priority within the strategy to improve access to suitable housing.
- 3.3 Suffolk County Council has responsibility for social care in Ipswich. The Market Position Statement<sup>2</sup>, which sets out the County Council's commissioning priorities, identifies the new approach to supporting customers with three different 'Tiers' of support. Tier 1, which applies to everyone in Suffolk, is 'Help to Help Yourself'. Accessible homes support this approach by better enabling people to manage their own lives at home, without the need for care support. Tier 2 is 'Help when you need it: immediate short term help'. Accessible homes assist this Tier of support by making homes more easily adaptable when needed, and by assisting with discharge from hospital.
- 3.4 The Ipswich Housing Strategy<sup>3</sup> recognises the specific needs of older people and those with care and support needs as priorities in improving housing supply. The independence of older and vulnerable people are key issues under the 'supporting and including people' priorities.
- 3.5 The Ipswich and East Suffolk Clinical Commissioning Group have a set of priorities which include 'promoting self care'. The provision of accessible dwellings will assist in meeting this priority.

The Likely Need for Future Housing for Older and Disabled People (including type and tenure)

4.1 The 2011 Census showed that 17.2% of the Ipswich population identified themselves as having a long term health problem or disability. 55% of those falling within this category were under 65, indicating that the need for accessible dwellings does not just relate to the elderly. During 2013/14, there were 230 people in Ipswich on the

<sup>&</sup>lt;sup>1</sup> Suffolk Joint Health and Wellbeing Strategy (Suffolk Health and Wellbeing Board, May 2013) http://www.healthysuffolk.org.uk/

<sup>&</sup>lt;sup>2</sup> Adult and Community Services Market Position Statement 2015-16( Suffolk County Council) https://www.suffolk.gov.uk/assets/suffolk.gov.uk/Care%20and%20Support/Adult/ACS%20Market%20Position%20Statement%20HR.pdf

<sup>&</sup>lt;sup>3</sup> Ipswich Housing Strategy 2010-11 – 2015-16 (Ipswich Borough Council) https://www.ipswich.gov.uk/content/ipswich-housing-strategy

Local Authority housing waiting list who 'need to move on medical or welfare grounds, including grounds relating to a disability'.4

Ipswich Strategic Housing Market Survey

- 4.2 The Ipswich Housing Market Area (HMA) comprises Ipswich Borough and the adjoining districts of Babergh, Mid-Suffolk and Suffolk Coastal. The Ipswich Housing Market Area Strategic Housing Market Assessment<sup>5</sup> (2012) identified the following in relation to housing needs for older or disabled people.
- 4.3 The SHMA shows that the Ipswich HMA has a higher than England average proportion of over 65 year olds, although Ipswich has a lower proportion. However the proportion as well as the overall number is projected to increase by 2031. In relation to Ipswich the SHMA states 'The total number of households is projected to increase from 56,000 in 2012 to 68,000 in 2031, an average annual increase of 636 households over this period. Most (48%) of this change would be in households with a reference person aged 60-79. By contrast with the other areas, the number of households aged 40-59 is projected to increase by 17%.' Further analysis of population projections<sup>6</sup> show that in 2011 the percentage of the Ipswich population at retirement age or older was 17.7% (23,600 people) but project that by 2031 this will be 23.6% (36,500).
- 4.4 The SHMA contains an assessment of households currently in need of suitable accommodation. Amongst other factors this includes 'Households containing people with mobility impairment or other specific needs living in unsuitable dwelling (e.g. accessed via steps), which cannot be made suitable in-situ;' Within Ipswich the SHMA identified that 2,025 households in Ipswich were currently in unsuitable housing, although the SHMA does not identify what proportion is due to accessibility. This figure for Ipswich was greater than that for the other three districts within the HMA and represented 48.5% of those in unsuitable housing across the HMA.
- 4.5 The SHMA identifies that Ipswich has the highest number of cases in the HMA of applications for Disabled Living Allowance<sup>7</sup> (DLA), despite having a population similar to that of Suffolk Coastal. The SHMA stated that one reason for this could be that the location or type of housing in Ipswich is more suitable for the type of households receiving DLA. Includes
- 4.6 The SHMA also identifies that the total number of people aged 65 and over in residential and nursing care during the year, purchased or provided by the Council with Social Services Responsibilities (i.e. Suffolk County Council) will increase by 61% in Suffolk between 2011 and 2030.
- 4.7 The provision of accessible dwellings may also help to free up existing homes. The SHMA states that 'With more older people being assisted to remain at home, the trend for larger homes to be under-occupied is likely to increase. This could have a

https://www.ipswich.gov.uk/sites/default/files/Ipswich HMA Projections September 2013.pdf

<sup>4</sup> https://www.gov.uk/government/collections/local-authority-housing-data#2013-to-2014

<sup>&</sup>lt;sup>5</sup> Ipswich Housing Market Area – Strategic Housing Market Assessment (Babergh District Council, Mid-Suffolk District Council and Suffolk Coastal District Council, 2012)

https://www.ipswich.gov.uk/sites/default/files/ipswichdistricts-shma-aug-2012 0.pdf

<sup>&</sup>lt;sup>6</sup> Ipswich Housing Market Population and Household Projections (September 2013)

<sup>&</sup>lt;sup>7</sup> Note the Disable Living Allowance has now been replaced with the Personal Independence Payment

knock-on effect of constraining the supply of homes. At the same time, older people will expect more choice on the type, quality and location of accommodation.'

#### POPPI and SHOP@ data

- 4.8 POPPI (the Projecting Older People Population Information Service) projects rates of older people with specific health conditions to 2030. The tool uses the May 2014 subnational population projections available for England which project forward the population from 2012 to 2037. In terms of mobility the tool identifies that within Ipswich, based upon a presumed rate, there are currently 4,045 over 65s who are unable to manage at least one of the defined activities on their own. By 2030 POPPI projects this as being 5,752 over 65s, an increase of 1,707 or 42%. The rates of those unable to manage at least one mobility task are taken from the Living Britain Survey (2001). Whilst the figures may not be directly based on Ipswich-specific evidence, it is reasonable to assume that the number of people unable to carry out the defined activities is increasing.
- 4.9 SHOP@ (Strategic Housing for Older People Analysis Tool) identifies demand for elderly persons housing at the local authority level. This assumes rates per 1,000 based on the More Choice Greater Voice (2008)<sup>9</sup>, however the prevalence rates used for the Suffolk SHOP@ info are related to but not necessary a direct reflection of those set out in More Choice Greater Voice. The More Choice Greater Voice report was commissioned on behalf of DCLG and the Department of Health to assist in the production of accommodation and care strategies for older people, although does not set rigid criteria. The population data used in the tool is from the May 2014 Office for National Statistics (ONS) sub-national population projections. The tool indicates that based on current provision there would be an undersupply of the specific types of housing below by 2030 and 2035 as follows:

Туре	Shortfall by 2030	Shortfall by 2035
Sheltered housing	372	622
Enhanced sheltered	306	346
Extra care	186	236
Registered care	578	798

- 4.10 By 2030 the shortfall equates to 864 units (excluding registered care spaces) and by 2035 equates to 1,204 units (excluding registered care spaces). The increase in demand represents an increase in 47% in total number of spaces from 2014. It should be emphasised that this tool focuses on the needs of those over 75 only, and there may be needs for the types of accommodation identified above in the younger age groups also.
- 4.11 Whilst the provision of accessible homes will not meet every need outlined above, it may help to reduce that need by providing accommodation that enables people to stay in their home for longer. The Top of the Ladder<sup>10</sup> report, produced by cross-party think tank Demos, states that 'Specialist housing for older people delays and often prevents the need for residential care.'

http://www.housinglin.org.uk/AboutHousingLIN/HowdolusetheHousingLIN/KeyDocuments/?&msg=0&parent =1648&child=2545

<sup>&</sup>lt;sup>8</sup> Activities include: going out of doors and walking down the road; getting up and down stairs; getting around the house on the level; getting to the toilet; getting in and out of bed

<sup>&</sup>lt;sup>9</sup> More Choice Greater Voice (DCLG, 2008)

<sup>&</sup>lt;sup>10</sup> Top of the Ladder (DEMOS, 2013) http://www.demos.co.uk/files/TopoftheLadder-web.pdf?1378922386

- 4.12 In addition the SHOP@ tool identifies that the number of over 75s living alone will increase by 36% by 2030 from 5,156 to 7,029, a total increase of 1,873. Whilst it cannot be assumed that all of these people will need all elements of accessible dwellings, the provision of such dwellings may enable them to remain in their own home for longer. Again, this is based upon the More Choice Greater Voice model, but it can be reasonably assumed that the number of elderly living along in Ipswich is increasing.
- 4.13 The More Choice Greater Voice report referred to above identified some factors, which apply nationally, which are pertinent to considering the need for accessible dwellings:
  - The majority of older people will live until the very end of their lives in general housing and may need adaptations and other forms of help and advice to cope with their homes.
  - An increasing proportion of older people are homeowners (around 75-80% in most places) and they will be reluctant to transfer into rented accommodation in old age and see the value of the equity in their homes eroded.
  - Much specialised accommodation is in sheltered housing, some of which is now quite old and lacks the space standards and facilities now accepted as normal.
  - The average age of those living in such accommodation has moved upwards very rapidly in the last two decades, bringing higher levels of need for support that the design of these buildings does not always allow.
  - Some sheltered schemes have seen the retreat of amenities, such as shops, access to doctors and pharmacy and proximity to public transport – making independent life for their residents more difficult.
  - New models of enhanced and extra care housing have emerged, offering not only the possibility of supporting higher levels of dependency but also an environment for a lively and active old age.
  - Local authority residential care provision is generally housed in buildings that are now showing the limitations of their design concepts, even when the fabric is in good condition. Whilst dedicated staff add enormous value to the lives of those who live in such homes the pattern is inherently institutional. Local authorities have generally found it unfeasible to continue the direct provision of such accommodation.
  - In the private sector the provision of traditional residential care in relatively small units is financially precarious and many providers continue to leave the market.
  - While the nursing home sector continues to provide a context for the care of the more physically dependent and mentally confused older people, the steadily rising cost makes it imperative that other solutions are explored.
- 4.14 The policy will support the work of Suffolk County Council Adult and Community Services. Adult and Community Services commissioners work with the borough and district councils in Suffolk to influence the quality and the design of homes so that they remain suitable should people develop difficulties in mobility, dementia or other debilitating conditions. Work with developers and suppliers of social housing is focussed on finding innovative ways to meet the challenges of providing sustainable, independent housing for an ageing population.

### Suffolk Housing Survey

- 4.15 The Suffolk Housing Survey was carried out in spring 2014 and took the form of a postal survey which was sent to a random sample of 25% of households in Suffolk. An online survey was also available to complete by any resident of Suffolk.
- 4.16 The results for Ipswich show that 1,194 out of 2,288 people responded to a question asking whether their home or the access to it has been built or adapted to meet the needs of someone with a disability. 3% of respondents to the survey in both Ipswich and across Suffolk stated that their home had not been adapted but needed to be. 10% of respondents to the survey stated that their home had been adapted (and that those adaptations are still needed). 8.8% of those who stated which adaptations were required quoted wheelchair access, 10% required a downstairs wet room, 4.9% required a downstairs bedroom, and 22% required access to the property or a ramp. The greatest requirement, at 32%, was assistance maintaining the home or garden, which may not represent a need for an adaptation as such. Assuming that the question was not relevant to those who did not answer, the above percentages can be used to identify a broad requirement across Ipswich, based upon current level of need.
- 4.17 Those who completed the survey include those living within nursing homes, residential care homes, sheltered accommodation and very sheltered accommodation and therefore the results are considered to take on board the accommodation needs of these residents.
- 4.18 2.6% of respondents who answered the question asking them to state the most important reason for moving house stated that this was due to access problems in their previous home. In relation to the question asking what is the most important reason for wanting to move home, 1.9% stated that their current home is difficult to access.

# Accessibility and Adaptability of Existing Stock

- 5.1 The English Housing Survey 2013 identified that across England found that between 2007 and 2013 there was increase in the proportion of homes in England which had all four visitability features (level access, flush threshold, sufficiently wide doors and circulation space and a WC at entrance level). Of those dwellings built after 1990 27% had all four features whereas only 1% built before 1945 did. Of those built after 1990 21% would require only minor works to make the fully visitable, whilst 54% of those built before 1919 were not feasible to make fully visitable. Whilst this data is not available specifically for Ipswich, much of the housing stock in Ipswich is dates from before 1945 including many Victorian terraces and inter-war properties. Due to the topography of Ipswich, many older properties are accessed by a number of steps.
- 5.2 Since 2007 a total of almost 1,600 adaptations<sup>11</sup> have been carried out on council housing stock within Ipswich Borough. These have ranged in scale and nature although many have consisted of provision of grab rails whilst a number of others have included provision of ramped access, removal of thresholds and incorporation of level access shower. Just two of the adaptations have related to a full adaptation for wheelchair use.

<sup>&</sup>lt;sup>11</sup> Each adaptation relates to one record which may include a number of individual measures.

#### Calculating a requirement for Ipswich

- 6.1 3% of respondents to the Suffolk Housing Survey stated that their home had not been adapted but needed to be. 10% of respondents to the survey stated that their home had been adapted (and that those adaptations are still needed). Assuming that the question was not relevant to those who did not answer, the above percentages can be used to identify a broad requirement across Ipswich, based upon current level of need.
- 6.2 In 2011, there were 58,700 households living in Ipswich Borough (2011 Census). Assuming the 3% referred to in 3.15 above is a representative sample of households across the Borough, this would equate to a need for adaptations in 1,761 houses. Further, of the 13,550 dwellings needed across the Borough to 2031, 1,761<sup>12</sup> of these would need to be adaptable to meet needs based of future occupants based on a 13% requirement (10% plus 3% of existing residents having either a met or unmet need for adaptations). This equates to an indicative requirement for 3,522 (1,761 + 1,761) homes to be built to be 'accessible' in some way by 2031 based on the current age structure of the population. This equals 25% of the housing requirement of 13,550 dwellings to 2031.
- 6.3 However, it is necessary to also factor in the future trends of an ageing population. The population projections referred to above 13 show that in 2011 the percentage of the Ipswich population at retirement age or older was 17.7% (23,600 people) but project that by 2031 this will be 23.6% (36,500). The growth in population is accounted for within the housing figure for Ipswich, but a 33% increase in the proportion of the population who are elderly would suggest an equivalent increase in the requirement for accessible dwellings. It is acknowledged that it is not only the older population that might require homes that are easier to access but there is more certainty over the likelihood that this demographic will have specific access needs.
- 6.4 It is therefore proposed that 35% (25% plus 33% to account for the increase in elderly in paragraph 3.3 above) of new housing should meet the requirements of M4(2) 'accessible and adaptable dwellings'. The policy requirement for M4(2) accessible and adaptable dwellings should align with other policy requirements and therefore it is proposed to set the requirement for major development (i.e. 10 or more dwellings). Excluding development already completed or permitted (3,433 dwellings at 1<sup>st</sup> April 2015) and the small windfall allowance (900 dwellings), a requirement of 35% would aim to deliver 3,257 accessible dwellings by 2031.
- 6.5 Bearing in mind the accessibility needs of the elderly identified in paragraphs 3.8-3.12 above and that in addition to this 55% of those with a long term health problem or disability were under 65 at the time of the 2011 census (paragraph 3.1 above), provision of the scale above would appear to be appropriate.
- 6.6 It is therefore proposed that 35% (25% plus 33%) of new housing should meet the requirements of M4(2) 'accessible and adaptable dwellings'. The policy requirement for M4(2) accessible and adaptable dwellings should align with other policy requirements and therefore it is proposed to set the requirement for major development (i.e. 10 or more dwellings).

<sup>&</sup>lt;sup>12</sup> Note it is by coincidence that both figures in the two separate calculations in this paragraph equal 1,761.

<sup>&</sup>lt;sup>13</sup> Ipswich Housing Market Population and Household Projections (September 2013) https://www.ipswich.gov.uk/sites/default/files/Ipswich HMA Projections September 2013.pdf

6.7 Of the requirement, an indicative 327 (2%) would need to be wheelchair accessible based on the 8.8% requirement identified under question E5 of the Suffolk Housing Survey. The planning practice guidance states that 'Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.' Wheelchair accessible dwellings should therefore be provided as part of the social housing provision of new development. This would form part of the 35% requirement for accessible and adaptable dwellings. As wheelchair accessible dwellings can only be provided in this way, it is sensible to align any policy requirements for these with requirements for affordable housing which is proposed to be set at sites for 15 or more houses and for provision to reflect identified needs at the time.

# **Viability**

- 7.1 The Housing Standards Review: Cost Impacts (EC Harris Built Asset Consultancy for DCLG, September 2014) report identifies the costs associated with building to the requirements of Part M4(2) and Part M4(3).
- 7.2 The cost of meeting the M4(2) requirement are identified as £289 £866 per dwelling (dependent on size/type of dwelling) after cost recovery (i.e. after higher sales values are factored in).
- The 'Viability Testing for the Ipswich Local Plan' report (2014)<sup>14</sup> on the Ipswich Local 7.3 Plan identified costs of around £2,000 per dwelling (2.5% build costs) to meet the requirements of the Code for Sustainable Homes. Whilst this policy requirement has been withdrawn the Council will still be requiring new dwellings to meet the optional water standard of 110 litres per person per day. The costs of this are identified in the Housing Standards Review: Cost Impacts report as being £0 - £9 per dwelling. The Council will also still be requiring energy standards equivalent to level 4 of the Code for Sustainable Homes to be met. Viability testing for the 2015 Minor Alterations to the London Plan<sup>15</sup> identified costs for meeting their proposal for achieving zero carbon homes (i.e. level 4 energy equivalent plus carbon offsetting) as 1-1.4% of build costs. Therefore the requirements for accessible dwellings and water between them can be seen to broadly replace the costs assumed in relation to the Code for Sustainable Homes in the Peter Brett Associates report. However, it is proposed that consideration of viability is built into the policy in similar to manner to other policy requirements.
- 7.4 The costs of building a wheelchair user dwelling are notably higher and therefore the policy would only require this as a part of the affordable requirement to meet a specified need and the costs would be considered as part of the overall viability considerations in relation to affordable housing provision.
- 7.5 In terms of impacts upon densities (i.e. the number of homes that can be accommodated on a particular site) the Impact on Site Density of Lifetime Homes report<sup>16</sup> suggests that building to Lifetime Homes standard would not have a significant impact on density with the exception of narrow frontage dwellings.

<sup>&</sup>lt;sup>14</sup> Viability Testing for the Ipswich Development Plan (Peter Brett Associates, 2014) https://www.ipswich.gov.uk/sites/default/files/ipswich\_viability\_testing\_for\_dev\_plan\_report.pdf

<sup>&</sup>lt;sup>15</sup> https://www.london.gov.uk/what-we-do/planning/london-plan/minor-alterations-london-plan/minor-alterations-london-plan-2015

<sup>&</sup>lt;sup>16</sup> Impact on Site Density of Lifetime Homes (DCLG, 2012) http://www.housinglin.org.uk/\_library/Resources/Housing/OtherOrganisation/Impact\_on\_site\_density\_of\_Lif etime Homes.PDF

Category M4(2) is acknowledged as being broadly similar to Lifetime Homes. The report, whilst acknowledging that it is difficult to reach any precise conclusions, suggests that any impact would be greatest on suburban developments of 30-60dph and specifically states 'In general terms, the results of this initial investigation suggest that the likely impact of Lifetime Homes is equivalent to the loss of 1-1.5 dwellings per hectare for schemes with a typical mix of 2-4 bedroom, 2/3 storey house types, in the middle of the suburban density range (i.e. 40-50 dwellings per hectare).' The report concludes that lower density and higher density schemes are not thought to be noticeably impacted. The report also recognises that there are many other factors which have an influence upon density.

## Draft policy

8.1 The following policy wording and supporting text is therefore proposed to be added to Policy DM5:

# Policy:

In new residential development of 10 or more dwellings, 35% of new dwellings will be required to be built to Building Regulations standard M4(2). Where affordable housing is provided a proportion of dwellings are required to be built to Building Regulations standard M4(3) as part of the affordable housing provision. The Council will consider waiving or reducing the requirement where the circumstances of the site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable.

### Supporting text:

In 2015, the Government introduced new 'optional' Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings. These optional standards can only be required through a planning policy requirement. The national Planning Practice Guidance states that 'Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements.'

The 2014 Suffolk Housing Survey indicates that 10% of Ipswich residents live in a home which has been adapted in some way for accessibility purposes. The results indicate that a further 3% of Ipswich residents currently require adaptations to their dwellings. Since 2007 almost 1,600 adaptations have been carried out on the Council's housing stock. The number and proportion of elderly residents in the Borough is predicted to increase over future years, potentially further increasing the need for dwellings to be accessible and adaptable.