

# Eden Local Plan

## Housing Standards Review and Policy HS5 Background Paper

November 2015

This paper sets out the background and evidence for Policy HS5 (Accessible and Adaptable Dwellings) in the Submission Local Plan. It was prepared following the outcome of the national housing standards review and the resultant need to amend the draft policy relating to housing for older people in the Preferred Options Local Plan.



## Contents

Background .....	3
Implications for the Local Plan .....	3
Is there a need (and if so evidence) to introduce the optional requirements? .....	4
Accessibility and Wheelchair Housing Standards .....	4
Water Efficiency .....	10
Internal Space Standards .....	11
Appendix 1 - Submission Local Plan Policy .....	12

## Background

1. In 2012 the Government commenced a review of the building regulations framework and voluntary housing standards as part of its 'Red Tape Challenge'. The review was concluded in March 2015 when the government announced a new approach to the setting of technical standards, including amended building regulations, new 'optional' building regulation standards and the introduction of a new optional national minimum space standard.
2. Following the review, local planning authorities now have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and can also opt into to the nationally described space standard. These optional standards are to be delivered through the planning system, with the requirements set out in Local Plans.
3. The amended Planning Practice Guidance states that local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.
4. In addition to introducing new optional standards the outcome of the review prohibits local authorities from setting their own additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.

*“From the date the Deregulation Bill 2015 is given Royal Assent (26.03.15), local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.” (Written Statement to Parliament)*

5. The review has resulted in the withdrawal of the Code for Sustainable Homes and the Lifetime Homes standards so these standards can no longer be applied by local authorities.

## Implications for the Local Plan

6. The conclusion of the housing standards review had a number of implications for the Local Plan as was drafted at Preferred Options stage. In particular draft policy HS5 'Housing for Older People and Those in Need of Support' required development for older people or groups who require supported housing to meet the Lifetime Homes standard.
7. As explained above local authorities can no longer apply additional standards outwith the building regulations regime or the new national space standards.

8. This therefore resulted in two broad options for redrafting this element of the Local Plan:
- *Option 1:* Remove the lifetime homes requirement from Policy HS5 and rely on standard building regulations in relation to access – M4(1).
  - *Option 2:* Replace Policy HS5 with a policy that requires the optional building regulations requirement M4(2) – Accessible and Adaptable Dwellings. The optional M4(2) requirement is broadly equivalent to the Lifetime Homes standard.
9. The national standards review also presented the options of whether to introduce the optional building regulation in relation to water efficiency and the nationally prescribed space standard. A review of available evidence was undertaken to determine whether it would be necessary or justified to introduce the new optional standards.

### **Is there a need (and if so evidence) to introduce the optional requirements?**

10. The following section explores the relevant evidence and considers the need and justification for the optional requirements.

#### **Accessibility and Wheelchair Housing Standards**

Optional Building Regulations Requirements:

M4(2) – Accessible and Adaptable dwellings

M4(3) – Wheelchair User Dwellings

11. The PPG suggests Local Authorities consider the following when determining whether to introduce the optional accessibility requirements:
- 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.
  - the overall impact on viability.
12. The PPG provides a link to a data sheet providing sources of information that LAs can draw upon to inform their assessments and the information presented below is based on these sources.

Evidence Source	Indicator	Findings in Eden														
LA Housing Statistics	People who need to move on medical or welfare grounds, including grounds relating to a disability	<p>2013-14: There were 1068 people on the waiting list at 1<sup>st</sup> April 2013. 63 people needed to move on medical or welfare grounds, including grounds relating to disability.</p> <p>2012-13: 1002 total, 33 medical/welfare/disability need.</p> <p>2011-12: 912 total, 78 medical/welfare/disability need.</p>														
Continuous Recordings (CORE)		<p><a href="#">Link to CORE Analysis gov.uk page</a></p> <p>New Core website went live on 12 October. Reports available for Eden at the link above but do not appear to include data on disability.</p>														
Personal Independence Payments	Numbers claiming personal independence payments (has replaced disability living allowance)	211 (Jan 2015)														
Census	Self-reported information on long term health problems and disabilities.	<p>2011 Census: 18.01% of people said they had a limiting illness/health problem. England: 17.64%</p> <p>2001 Census: 17.11% in Eden, 17.93% England.</p>														
Population Estimates	Estimates by age cohort.	<p>2012 based projections show an ageing population.</p> <table border="1" data-bbox="695 1839 1401 2011"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">Numbers</th> <th colspan="2">% of Total Population</th> </tr> <tr> <th>2014</th> <th>2032</th> <th>2014</th> <th>2032</th> </tr> </thead> <tbody> <tr> <td>65+</td> <td>12906</td> <td>18243</td> <td>24.48%</td> <td>34.19%</td> </tr> </tbody> </table>		Numbers		% of Total Population		2014	2032	2014	2032	65+	12906	18243	24.48%	34.19%
	Numbers			% of Total Population												
	2014	2032	2014	2032												
65+	12906	18243	24.48%	34.19%												

		80+	3403	6683	6.46%	12.52%
		All ages	52712	53361		
Household Projections	Household projections by age cohort.	2012 based household projections by age cohort (of household representative) show large forecasted increases in older households.				
		Number of households				
		Age Group	2014	2032	2014-32 Change	% change 2014-2032
		15-19	48	47	-1	-2.08%
		20-24	433	382	-51	-11.78%
		25-29	900	899	-1	-0.11%
		30-34	1161	1251	90	7.75%
		35-39	1288	1480	192	14.91%
		40-44	1796	1644	-152	-8.46%
		45-49	2278	1499	-779	-34.20%
		50-54	2358	1575	-783	-33.21%
		55-59	2115	1766	-349	-16.50%
		60-64	2348	2556	208	8.86%
		65-69	2487	2739	252	10.13%
		70-74	2021	2622	601	29.74%
		75-79	1619	2096	477	29.46%
		80-84	1319	2181	862	65.35%
		85+	1186	2602	1416	119.39%
		Total	23358	25342	1984	8.49%

13. In addition to the suggested evidence sources in the government's data sheet we have also used POPPI (Projecting older people population information) and PANSI (Projecting adult needs and service information) data sources to understand future need for accessible and adaptable homes.

POPPI Data	2014	2030
Mobility <sup>1</sup>	2308	3602
Long Term Illness (a little) <sup>2</sup>	3187	4465

<sup>1</sup> People aged 65 and over unable to manage at least one mobility activity on their own, by age and gender, projected to 2030. 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>2</sup> People aged 65 and over with a limiting long-term illness, by age, projected to 2030. Figures are taken from Office for National Statistics (ONS) 2011 Census, Long term health problem or disability by health by sex by age, reference DC3302EW.

Long Term Illness (a lot)	2434	3644
Over 75's living alone	2863	4668

PANSI Data	2014	2030
Moderate Physical Disability	2626	2366
Serious Physical Disability	818	750

### **What does the above evidence tell us?**

14. The Local Authority Housing Statistics appear to show a wide fluctuation in those people on the waiting list needing to move on medical/welfare/disability needs, with the latest figure standing at 63. Without knowing more about the case behind these numbers it is difficult to draw anything meaningful from them.
15. The 2011 Census showed a small increase from 17.11% to 18.01% in the proportion of people with a long term limiting illness or health issue. Whilst this proportion has increased in Eden, the national proportion has actually fallen from 17.93% to 17.64% meaning that Eden now exceeds the national average.
16. Population estimates forecast an increasingly ageing population in Eden. In 2014 approximately a quarter of Eden's population were aged 65+. In 2032 this is predicted to increase to 34%. The proportion of the population aged over 80 will increase from 6.5% to 12.5%. These proportions equate to an extra 5,337 over 65s and 3,403 over 80s in 2032. Whilst general health in Eden compares well against regional and national averages, a large increase in the older population will inevitably lead to an increase in the need for suitable housing that can be adapted to allow people to stay in their own homes for longer.
17. Household projections based on the 2012 population projections show a large projected increase in older households over the plan period. The number of households where the representative is aged 60+ is set to increase considerably, and the number of households where the representative is 85+ is forecast to double.
18. The POPPI data projects a significant increase in the number of over 75s living alone by 2030. It forecasts large increases in the number of people with limited mobility and limiting long term illnesses. This suggests there will be an increased need for suitable homes that can be adapted to meet their inhabitants' changing requirements.
19. The above evidence suggests that the introduction of the optional accessibility standard M4(2) could be justified in Eden due to its ageing population and forecasted increase in the number of people with mobility issues and limiting illnesses.

20. Given the need to carefully justify the introduction of such a requirement consideration has been given as to whether it would be appropriate to apply the requirement to all new housing or a proportion of it. It is considered that it would be desirable and beneficial for all new housing in the district to meet the requirement but acknowledged that given the PPG guidance it may be difficult to justify such a requirement. In considering a suitable minimum proportion of new homes that should be required to meet the optional standard evidence on the proportion of the population projected to have mobility issues or limiting illnesses was used as a starting point. POPPI data forecasts that by 2030 over 20% of the population is likely to have mobility issues or limiting long term illnesses. The 2011 census reported that 18% of people currently report themselves as having a limiting illness/health problem. By 2032 27% of all households will have a household representative aged 75 or over, and POPPI predicts that by 2030 there will be over 4600 over 75s living alone. All of the above evidence suggests that a requirement of 20% of new homes to meet the optional building regulation for accessible and adaptable homes would be the minimum considered appropriate, and the Council would of course encourage a higher proportion than this.

**Viability impacts of introducing the requirements**

21. In introducing a new policy requirement for the optional building regulation M4(2) it is necessary to consider the viability impacts of introducing the requirement. As a starting point it is useful to highlight the key differences between the compulsory M4(1) requirement and optional M4(2) requirement in order to identify where the optional requirement may increase build costs.

<b>M4(2) – Accessible and adaptable</b>	<b>Viability Implication</b>
Has an additional car parking and drop off requirement. This requires at least one parking space that can be widened to 3.3m, a standard parking bay close to communal entrances with a clear access zone of 900mm, step free access between parking bay and dwelling entrance, level or gently sloping parking bays, suitable surfacing.	Unlikely to result in cost implications as can be designed into a scheme at the outset. May have a slight impact upon densities that can be achieved.
Communal entrance to be slightly wider. Also some extra requirements e.g. lower door entry controls, level landing area outside the entrance.	Unlikely to increase costs, doorway width increase minimal.
Communal lifts – car size to be slightly bigger	Potential very slight increase in cost of lift, and slightly increased space demand.
Private entrances and spaces within dwelling –	Slight increase in costs e.g.

<p>slightly wider principal entrance door opening (850mm rather than 775mm), level external landing area and at least partly covered, automatically lit entrance (motion/dusk to dawn). Additionally some of the extra M4(2) requirements also apply to other entrances and not just the principal one.</p>	<p>installing automatic lighting. Slight increase in costs in applying standards to other entrances and not just principal.</p>
<p>Additional requirements for living, kitchen and eating areas – a living area should be on entrance storey. Min 1200mm clear space in front of and between kitchen units and appliances. Glazing to the principal window of principal living area starts at max 850mm above floor level.</p>	<p>Potential need to increase room size although could likely be achieved through layout.</p> <p>Could potentially affect the density of a scheme as would restrict house types such as 3 storey town house types with living accommodation on the 1<sup>st</sup> floor.</p>
<p>Additional requirement for bedrooms – every bedroom to provide clear access route 750mm wide from doorway to window. Varying space requirements for bedrooms e.g. principal bedroom to provide 750mm on either side and the foot of bed.</p>	<p>This requirement could require bedroom sizes to be slightly larger than some standard house type room sizes.</p>
<p>Sanitary facilities – walls, ducts, boxings etc. to be strong enough to support grab rails, seats and other future adaptations. In a 2/3 storey dwelling with 3+ bedrooms the bathroom to have an installed level access shower or potential level access shower. Some additional access zone requirements for bathroom layouts. A bathroom to be located on the same floor as the principal bedroom.</p>	<p>This requirement could potentially result in bathroom sizes needing to be increased.</p>
<p>Services and controls – additional requirements for the height of window handles. Height restrictions for boiler timer controls and thermostats.</p>	<p>No cost implications, just different positioning.</p>

22. In conclusion the above comparison does not highlight major cost implications in constructing dwellings to the M4(2) standard. Most of the differences between the standard building regulations and the M4(2) standard can be achieved through careful design and layout rather than requiring additional costs. Some of the

requirements may have implications the space required in new dwellings but they are not considered to be onerous.

## Water Efficiency

23. The new optional requirement within G2 of the Building Regulations is a reduction in the general standard of 125 litres/person/day to 110 litres/person/day.
24. The PPG is confirms that this standard should be applied only where there is a clear need, which should be established through existing sources of evidence, consultations with utilities providers and the EA and consideration of the impact on viability.
25. The table below summarises the sources of evidence that the PPG recommends using to establish if there is a clear need for such requirements:

Evidence Source	The findings for Eden
Environment Agency Water Stressed Areas Classification 2013	The United Utilities and Northumbrian Water areas are both classified as being under 'moderate stress' at present and at 'moderate stress' in a range of future scenarios. With a final stress classification of 'Not Serious', Eden is not therefore considered as an area of serious water stress.
Water Resource Management Plans	United Utilities' 2015 Final Water Resources Management Plan:  The majority of Eden's population is served from the Integrated Resource Zone that covers most of the North West. A separate North Eden Resource Zone serves a population of 14,000. The Management Plan confirms that there will be enough water available to meet the challenges of population growth, new housing, climate change and environmental protection without any need for enhanced demand management or new water sources.

### What does the evidence above tell us?

26. There are no major constraints with regards water resources and Eden is not in an area of water stress, and resultantly there is no clear need for introducing the option water efficiency building regulations standards.

## **Internal Space Standards**

27. The requirements of the space standard are set out in the Nationally Described Space Standard.
28. The PPG states that where a need for internal space standards is identified local authorities should take account of need (based on evidence on the size and type of dwellings currently being built), viability of imposing the standards, and timing to allow a reasonable transitional period.
29. It is not considered that there is an already identified need to adopt the nationally described space standard in Eden.
30. We do not monitor the size of completed units other than by number of bedrooms and it would therefore be an onerous task to determine the specific sizes of recently permitted and completed units to determine how they would compare with the national standards.
31. A quick review of Story house types approved on the Lazonby site revealed that most of their house types exceed the new national standards, with the exception of some of their smaller 2 and 3 bed semi-detached house types which tend to be their affordable units and would fail the new standards.
32. Persimmon Homes do not provide GIA on their house type plans but a rough calculation based on their Carleton Meadows house type plans indicates their smaller house types would fail their respective new standards.
33. A quick calculation of the last remaining 3 bed Russell Armer house at Cambridge Drive indicates that it would also fail the new national standards.
34. Adopting the new national space standards would therefore have likely effects on the key house builders in Eden and would require further investigation if pursued.

## Appendix 1 - Submission Local Plan Policy

### Policy HS5 – Accessible and Adaptable Homes

New housing must be designed and constructed in a way that enables it to be adapted to meet the changing needs of its occupants over time.

For this reason the Council will require 20% of new housing on sites of 10 or more new homes to meet the optional Building Regulations Requirement M4(2): Category 2 – Accessible and Adaptable Dwellings.

Only where circumstances exist where it can be demonstrated by the applicant that it is not practically achievable or financially viable to deliver this policy will new development be exempt from the requirement.

#### Explanation

4.12.1 As a result of the national housing standards review the Government has amended the building regulations and has enabled local authorities to set 'optional' building regulations requirements where there is local justification. One of these optional requirements relates to the enhanced accessibility and adaptability of dwellings. Eden Council has decided to apply the optional requirement M4(2): Category 2 – Accessible and adaptable dwellings. The requirement will be secured through a planning condition on permitted schemes.

#### Reason for this policy

4.12.2 Eden's population is ageing and over the life of the Local Plan the number of people aged over 65 is set to grow by over 40%, meaning that by 2032 more than a third of our population will be over 65. The number of households where the household representative is over 85 is set to double in the same period. It is therefore important that the Local Plan takes a positive approach to planning ahead for the housing issues that will arise from an ageing population.

4.12.3 Policy HS5 recognises that people's needs change over their lifetimes due to ageing or disability/illness. As people's needs change, having an adaptable and accessible home means that they will be able to choose for themselves whether to stay in their own home, rather than being forced to move if it becomes unsuitable. Policy HS5 seeks to ensure that an appropriate proportion of new housing in Eden is built to a standard that means it is more accessible and can be more easily adapted to suit its occupants' needs over time.