

Site Specific Part 2 (SSP2) Local Plan

Background Paper: Provision of Category 3 Housing and General Housing for Older Persons

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Kettering
Borough Council

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1. Introduction

1.1 This background paper considers the need for an additional local policy on housing for Older Persons and Category 3 (wheelchair) housing to meet local needs. This is in response to representations received to the draft Site Specific Part 2 Local Plan (SSP2) consultation. The purpose of this paper is to:

- I. Gather evidence to justify the inclusion of a policy requiring a percentage of Category 3 (wheelchair) homes and;
- II. Carry out additional work to determine whether developments above a certain threshold should make provision for older persons housing.

1.1 This background paper is set out as follows:

- Section's two and three outline the planning policy context;
- Section four provides an assessment of the recent studies undertaken to understand the demand for older persons housing and wheelchair housing; and
- Section five summarises the findings of the assessment above and sets out Kettering Borough Councils policy approach to specialist housing for older persons and Category 3 housing.

Definitions of Specialist Housing

1.2 There are varying types of specialist housing and this background paper provides an assessment of housing for older people and Category 3 (wheelchair) users housing to meet local demand in Kettering. It does not provide guidance or assess specialist housing need for other vulnerable groups.

1.3 Paragraph 10 of the PPG defines housing for older people into the following categories:

1. Age restricted / age exclusive independent accommodation – usually restricted to people above 55 years of age with no additional facilities or services.
2. Specialist Housing for older people:
 - i. Retirement housing – housing for older people with some additional facilities
 - ii. Supported housing – housing for older people with a greater range of facilities and with support and care available
 - iii. Retirement villages – larger scale clusters of accommodation with a central hub providing a large range of facilities – i.e. Extra Care Housing
3. Residential and nursing homes – these are not considered specialist housing but provide care and/or nursing.

The above list should not be seen to be definitive, any single development may contain a range of different types of specialist housing.

1.4 Paragraph 12 of the PPG requires plan-makers to 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 to.

2. National Policy Context

National Planning Policy Framework (NPPF), 2019

2.1 A new NPPF was published in February 2019 and subsequently revised PPG has been published in relation to specialist housing. The most recent changes to the PPG were published on 26 June 2019.

Older Persons Housing

2.2 Section 5 of the NPPF sets out the key aims of the Government to significantly boost the supply of housing.

2.3 Paragraph 59 of the NPPF expects that the needs of groups with specific housing requirements are addressed and Paragraph 61 of the NPPF goes on to explain '*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).*'

2.4 With respect to older persons, the NPPF¹ defines this group as: "*People over or approaching retirement age, including the active, newly retired through to the very frail elderly: and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialist housing for those with support or care needs*".

National Planning Practice Guidance (PPG)

2.5 The PPG goes into further detail on the planning matters related to older persons housing. Paragraph 001 cites the need to make provision for older people as being critical due to people living longer lives and the proportion of older people in the population increasing. By offering older people, a better choice of accommodation to suit their changing needs, this can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.

2.6 Paragraph 004 of the PPG identifies sources of data to assess requirements of older people and points to evidence drawn from census data on population and forecasting from the Office of National Statistics (ONS) and the Joint Strategic Needs Assessments (JSNA) undertaken by local authorities and health and well-being boards.

2.7 Paragraph 007 expects LPAs to set out how they intend to demonstrate the need for requirement M4(2) and M4(3) of the Building Regulations based on their housing needs assessment and other available datasets.

Accessible and Adaptable Housing

2.8 The Housing White Paper² makes references to accessible housing highlighting the need to:

¹ Annex 2: NPPF glossary

² Fixing our broken housing market, 2019

- Strengthen national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs such as older and disabled people;
- Ensure a more consistent delivery of accessible housing, including a new statutory duty to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people; and
- Set a clear expectation that all planning authorities should devise policies using the Optional Building Regulations (Part M (4) Cat 2 and 3 to bring an adequate supply of accessible housing to meet local need.

Housing for Disabled People

2.9 Paragraph 002 of the PPG highlights the importance of making provision for people with disabilities in helping them to live safe and independent lives in recognition that an ageing population will give rise to increasing numbers of disabled people.

2.10 Paragraph 005 provides guidance on forecasting housing need for disabled people and identifies the multiplicity of sources of information needed to be considered in relation to disabled people who require adaptations in their homes, either now or in the future.

Category 3 (Wheelchair) Housing

2.11 Paragraph 008 of the PPG identifies the benefits of accessible and adaptable housing to enable older persons to live more independently by building accessible housing from the outset rather than have to make adaptations at a later stage, from both a cost perspective and having regard to people being able to remain safe and independent in their homes for longer.

2.12 Paragraph 009 goes onto to say where an identified need exists, plans are expected to make use of the optional technical housing standards (footnote 46 of the National Planning Policy Framework) to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:

- M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)
- M4(2) Category 2: Accessible and adaptable dwellings
- M4(3) Category 3: Wheelchair user dwellings

2.13 The PPG goes onto stress that the new optional national technical standards³ should only be required through new local plan policies if they address a clearly evidenced need, and where their impact on viability has been considered.

³ MHCLG Housing: Optional technical standards 2015.

Document M Building Regulations, 2010 (2015 edition, incorporating 2016 amendments)

2.14 Since October 2015⁴ the building regulations have offered the means to specify adaptable and accessible design standards for new homes. Of the three standards of accessibility, only one is mandatory. All new-build housing or housing development to which Part M of the building regulations applies must be built to Category 1, as the minimum mandatory standard.

2.15 This obligation only changes when local plan policies set requirements for Category 2 or Category 3 standards to be met and specific planning conditions are placed on planning permissions accordingly. This change is reflected in the emerging Kettering Site Specific Part 2 Local Plan (SSP2) and is discussed further in this paper.

3. Local Policy Context

North Northamptonshire Joint Core Strategy (NNJCS)

3.1 The North Northamptonshire Joint Core Strategy identifies a requirement of 35,000 new homes from 2011-2031 to meet the needs of North Northamptonshire's growing population. Kettering Borough Council is expected to provide an additional 10,400 dwellings over the plan period up to 2031. Accommodation for older people will be a key and integral part of both this regeneration and of the development of new communities. Policy 30 of the JCS encourages the provision of market and affordable housing to meet the specialist housing needs of older households.

3.2 JCS Policy 30 "Housing Mix and Tenure" of the NNJCS states that all new dwellings must meet category 2 of the National Accessibility Standards as a minimum, and allows Kettering Borough Council to negotiate with developers, a proportion of Category 3 (Wheelchair accessible) housing based on evidence of local needs.

3.3 Supporting paragraph 9.46, of the NNJCS, provides guidance on identifying the proportion of new development that needs to comply with Category 3 housing, by taking account of:

- The likely future need for people with disabilities;
- Whether particular sizes and types of houses are needed to meet specifically evidenced needs;
- The accessibility and adaptability of existing stock; and
- Overall impact on viability.

⁴This document streamlines and replaces the various different sets of standards, including for accessible housing, representing a significant shift away from requiring compliance with the Code for Sustainable Homes or other local technical standards and towards Category 3 (wheelchair) Housing, in response to the Written Ministerial Statement Made on 25th March 2015 (HCWS488), (WMS).

Kettering Site Specific Local Plan 2 (SSLP2) Draft Consultation

3.4 The draft SSLP2 Public Consultation asked the following questions in relation to older persons housing:

Q1. whether they [the consultee] felt it appropriate to include a policy identifying the proportion of new development that needs to comply with category 3 of the national accessibility standards; and

Q2. whether they [the consultee] felt it appropriate to include a policy requiring developments above a certain threshold to make provision for older persons.

3.5 A number of responses were received from the commercial sector seeking evidence to support a requirement, together with a viability assessment.

4. Understanding the demand for older persons housing and Category 3 (wheelchair) housing

4.1 To plan for specialist housing, this paper sets out the expected population growth and subsequent forecast housing need going forward to 2031. This document utilises a variety of data sources and evidence to provide guidance on the quantity and type of specialist housing required in Kettering, including evidence produced by Northamptonshire County Council and partners.

Population Forecasting

4.2 The baseline data used for all forecasting models is from the Office of National Statistics (ONS). In determining the need for specialist housing this paper draws on the following studies:

- **North Northamptonshire Joint Strategic Needs Assessment (JSNA), 2017;**
- **North Northamptonshire Strategic Housing Needs Assessment (SHMA Update), 2015;**
- **Study of Housing Support Needs of Older People across Northamptonshire, 2017** which utilises the latest CLG 2011-based Household Projections (adjusted and projected forward to 2031 by CCHPR) to revised *HMA and Housing Requirements Toolkits* for each authority.
- **Northamptonshire Joint Health and Well-being Strategy 2016-2020**

Population Forecasting for Older People

4.3 The 2018 population estimate for Kettering is 101,300 which represents an increase of 8.4% since 2011. The population is predicted to grow to 116,078 by 2031 from a 2016 baseline, representing an increase of 14,778 over the plan period.

4.4 The percentage of population aged 64 plus is 16.1% which closely follows the national average of 16.65% for England and Wales, using the 2011 census as a baseline. The proportion of population aged 65 plus is steadily increasing and predicted to make up around 23% of the total population by 2031. The net increase in residents aged 65 and over is estimated to be just under 10,000 people over the lifetime of the plan.

Population Forecasting for People with Physical Disabilities

4.5 The Northamptonshire JSNA 2017 demographics identifies 16,000 people in Kettering as having a disability, which is higher than the Northamptonshire average. 89% of which have a physical disability and 11% have a learning disability. 54% of people with a disability in Kettering are aged 65 and over, with the peak age group in receipt of Attendance Allowance⁵ being 90 years and over.

4.6 In May 2016, there was around 3,160 eligible Disability Living Allowance (DLA) or Personal Independence Plan (PIP) claimants in Kettering.

4.7 At a local level, applications for Disabled Facilities Grant (DFG) showed a steady increase between 2014/2015 and 2018/2019 of 30%. This grant provides an indication of the levels of expressed need.

<i>Period</i>	<i>Number of DFG's issued</i>
<i>2018 / 2019</i>	<i>69</i>
<i>2017 / 2018</i>	<i>77</i>
<i>2016 / 2017</i>	<i>76</i>
<i>2015 / 2016</i>	<i>61</i>
<i>2014 / 2015</i>	<i>53</i>

Source: Housing, Kettering Borough Council.

4.8 Kettering Borough Councils 2018/2019 KEYWAYS register identifies 154 applicants who have specific a need for some form of adaption in the accommodation they are seeking out of a total of 761 active applicants⁶; of these 108 have had an assessed sheltered housing need.

4.9 The number of residents with physical disabilities aged 75 and above will gradually increase over the upcoming 10 years in line with the regional and national averages. It is worth noting that the housing requirements for disabled people can sometimes share the same

⁵ Attendance Allowance is payable only to those aged 65 and over who have a disability that requires some assistance or supervision to safely complete daily tasks.

⁶ Accurate as at 05.04.2019

characteristics as housing for older people and in some cases can be provided together, through extra care housing.

Types of Specialist Housing

4.10 This Paper has drawn on the definitions of specialist housing as set out in the Housing Support Needs of Older People across Northamptonshire Study, (March 2017), which was intended to supplement Northamptonshire County Councils (NCC) Older Persons Accommodation Strategy and to form part of the evidence base for emerging Part II local plans. The study breaks down the types of housing for older people and defines the following categories of housing:

- Age restricted / age exclusive independent accommodation (restricted to people above a specified age, usually 55-60 years old) with no additional facilities or services.
- Specialist Housing for older people:
 - Retirement Housing – housing for older people with some additional facilities
 - Supported Housing – housing for older people with a greater range of facilities and with support and care available
 - Retirement Villages – larger scale clusters of accommodation with a central hub providing a range of facilities.
- Residential and nursing homes – institutional establishments which are not specialist housing which provide accommodation, care and/or nursing.

4.11 The PPPG makes clear that where an identified need exists plans are expected to make use of the Optional technical housing standards to help bring forth an adequate supply of accessible housing. Policies for housing can set out the proportion of new housing that will be delivered to the following standards:

- M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)
- M4(2) Category 2: Accessible and adaptable dwellings
- M4(3) Category 3: Wheelchair user dwellings

4.12 All new development should fall under at least one of the above categories with categories M4 (2) and M4 (3) being “optional requirements” as defined by the Building Regulations.

Older Persons Housing Need

4.13 The Supported Housing Needs of Older Persons report forecasts demand for new provision of 320 older persons housing per year in North Northamptonshire (see table 1). The figures are higher than those quoted in support of the NNJCS and represents a move to increase the proportion of older person households living in specialist accommodation, with demand for retirement housing being predominantly for outright ownership. The Study sets an annual target for the projected provision of specialist housing in Kettering to the end of the plan period and estimates the needs for retirement provision as being as high as 92 dwellings per year (see table 2).

Table 1: Projected specialised housing requirements of older households for Kettering

65+ Households	65+ totals	Under-occupying	Designated	Sheltered	Extra Care
Additional H'holds	5,825	3,385	366	175	320

Table 2: Forecast demand for the provision of older persons housing in Kettering

Requirement No.	Category	Open Market	Shared Equity	Social Rent	Total
1	Retirement Housing (annual target)	62	30	0	92
2	Care Home (requirement until 2030)	-	-	-	228 (18 care homes P/A)
3	Dementia Care Facility (requirement for 2020-2022)				1

Strategic Housing Market Assessment (SHMA) 2015 Update

4.14 The 2015 Update focused on the general and older persons housing requirements of the 2012 study. The SHMA toolkit enables projections to be made of the number of pensioner households requiring designated, sheltered or extra-care housing. The SHMA Update concluded a significant increase in the projected growth of older households and the subsequent requirement for an increased number of designated, sheltered or extra-care housing requirements up until 2031.

4.15 In response to the identified need for older persons housing above, Kettering Borough Council can demonstrate provision being met for this group (see below). The current pipeline for specialist housing (including completions since 2016) is set out below:

Planning Reference	Address	Pipeline	No. of older persons housing
KET/2016/0576	West Hill (land at), Kettering	Complete	66 bed residential care home
KET/2018/038	Old Satra House, Kettering	Under construction	127 units
KET/2018/0804	Albert Street Garages (KBC	With planning permission	6 Bungalows (Standard) over 55/with mobility issues via allocations scheme
KET/2017/0612	Ashley Court, Reservoir Road, Kettering	With planning permission	Additional 18 bedspaces as part of an extension to an existing care home.
Total Pipeline			217
Target up to 2031			228 (18 pa)

5. Conclusions

A key issue for North Northamptonshire is the provision of housing to meet the needs of older (65+ age group) households, which is forecast to account for 60% of household growth between 2011 and 2031 (JCS para 9.41). In Kettering, it is predicted to make up around 23% of the total population by 2031 and a net increase of almost 10,000 people over the lifetime of the plan.

The Northamptonshire JSNA 2017 demographics identifies 16,000 people in Kettering as having a physical disability. This figure is likely to increase over the next 10 to 15 years in line with regional and national trends amongst residents aged 75 and above.

In understanding the demand for older persons housing, recent studies undertaken for north Northamptonshire noted a significant increase in the projected growth of older households, over the plan period and the subsequent requirement for an increased need for specialist housing by pensioner households, including category 3 (wheelchair user) housing. While M4(2) Category 2 homes are accessible to a larger number of people, they do not provide the space or features of a wheelchair-accessible home. As such, Kettering Borough Council will continue to work with partners and developers to influence the market to develop homes that have been designed to be suitable for the changing requirements and aspirations of older people.

JCS Policy 30 "Housing Mix and Tenure" supports Kettering Borough Council to negotiate with

developers, a proportion of Category 3 (Wheel-chair) accessible housing based on evidence of local needs.

Kettering's emerging policies will provide additional local guidance on the suitability of sites to meet the specialist housing requirements of older people, and to require sites to deliver a proportion of housing to meet the needs of older people, these policies are set out below.

6. Publication Draft Kettering SSLP2 emerging policies

The following policies will ensure the housing specialist needs of older persons will be provided for in Kettering over the plan period.

Retirement Housing and Care Homes

Proposals for Retirement Housing or Care Homes will be supported where the development has good access to public transport links and to local services and facilities.

Justification

The Housing Support Needs of Older People across Northamptonshire Study, (March 2017), recommends how local plans can make provision for specialist housing and identifies sources of supply such as windfall sites, change of use from employment and retail uses and on brownfield sites. The report stresses the importance of the suitability of sites for specialist housing, such as proximity to services and facilities and close links to public transport.

Older Persons Housing

On sites of 50 dwellings or more or sites of 1.6ha, the Council will seek the provision of a proportion of dwellings that are suitable to meet the needs of older people.

In determining the precise proportion, type and tenure, account will be taken of:

- **the viability of the scheme;**
- **evidence of local need; and**
- **the scale and location of the site.**

Justification

Homes built to accessible and easily adaptable standards can help alleviate pressures on health and social care services. This could take the form of age restricted accommodation, sheltered or extra care properties, properties designed to Category 3 (wheelchair housing) or the provision of bungalows.

Evidence of demand for specialist housing for older persons and wheelchair housing has been established through recent studies undertaken by Northamptonshire County Council. As such, Kettering Borough Council will continue to work with partners and developers to identify gaps in both specialist housing for older persons and wheelchair housing provision.

Sites of 50 dwelling site size (or 1.6ha), will be required to provide a proportion of housing to meet the needs of older people. It is considered that this is a reasonable threshold for requiring sites to make provision for older persons housing. The site size threshold is based on a density of 30 dwellings per hectare on a 50 dwelling scheme. This figure has been informed by the density of the proposed housing allocations. The information can be found within the Housing Land Supply Background Paper.

Category 3 Housing

Consideration has been given to the inclusion of a policy which identifies a proportion of new development that complies with Category 3 housing. However, the evidence is currently not available to set a specific percentage requirement within a policy, therefore our approach will be to continue to negotiate on a site by site basis, in accordance with Policy 30 of the JCS, with the precise amount of Category 3 to be determined, following negotiation with the applicant as part of the planning application process.