Note for Inspector
Policy A6 – Accessible and adaptable homes evidence

1.1   This note confirms the evidence used and subsequently updated to inform Policy A6 'Accessible and adaptable homes' of the Gloucester City Plan, focusing on the data provided at a local i.e. county and city level. It also provides the latest data from the Council's Housing Register that shows demonstrable need for accessible and adapted housing within the Affordable Housing sector, which is just one element of the need.

1.2   The initial evidence base was submitted as part of the Housing Background Paper (Submission Document HOU001), Section 2. The evidence base justifying the policy in relation to accessible and adaptable homes has been updated through the commissioning of a Local Housing Needs Assessment (LHNA) carried out by Opinion Research Services (ORS) on behalf of the Gloucestershire local planning authorities.

1.3   Paragraphs 30 and 31 of the Executive Summary of the LHNA states:

'30 *Based on the projected household growth and the changing demographics of the area, the LHNA has established the future need for adapted housing. Whilst there is inevitably uncertainty about how many households will be able to meet their housing needs without moving and how many will move to existing homes rather than new housing; Figure 83 summarises the identified need for M4(3) Category 3 housing (both adaptable and adapted) and the minimum need for M4(2) Category 2 housing.'*

Figure 83: Summary of need for M4(2) and M4(3) housing by area

	Local Authority						TOTAL
	Cheltenham	Cotswold	Forest of Dean	Gloucester	Stroud	Tewkesbury	
Need for M4(2) housing	7,215	6,138	6,796	8,647	8,254	6,397	43,446
Need for M4(3) adaptable housing (market housing)	571	520	451	602	684	573	3,401
Need for M4(3) adapted housing (affordable housing)	213	210	170	387	297	232	1,509
Overall need for adapted housing	**7,999**	**6,868**	**7,417**	**9,636**	**9,235**	**7,202**	**48,356**

*31. The evidence supports the need for a target of **67% of all housing to meet M4(2) Category 2 requirements,** and preferably more to take account of the lack of provision in the existing housing stock; and a target of **8% of all housing to meet M4(3) Category 3 requirements'.***

Relevance of submitted evidence.

1.5   Mr Jonathon Lee of ORS has commented that ORS has taken an approach that:

'… is supported by NPPF para 31, which states that evidence should be proportionate; and in terms of this specific issue, PPG ID 56-007-20150327 [1] explicitly signposts suggested data (including the national data) in order 'to assist local planning authorities. …The approach that we have taken uses the majority of the data sources that CLG identifies. We also use additional locally-specific data on residents in receipt of the mobility component of disability benefit – which is administrative data about the actual number of claimants, rather than survey estimates. Whilst the analysis does take national rates as a starting point, these are all adjusted based on local circumstances – and it is the local population and household projections that provide the baseline to which the rates are applied. Whilst it would be possible to produce local rates without using the national data, this would depend on primary survey work which would be disproportionately costly and unnecessary, given that making local adjustments to the national rates is entirely adequate.

1.6   Mr Lee has confirmed that the ORS approach has informed policies that Inspectors have found to be sound in each of these plans, which have all been adopted:

- •   Daventry Local Plan Part 2
- •   Bedford Borough Council
- •   Durham Council
- •   East Hertfordshire District Council
- •   Hackney, London Borough of - Local Plan 2033
- •   Harlow District Council
- •   Milton Keynes Council (Plan: MK)
- •   Stockton-on-Tees Borough Council
- •   Tower Hamlets, London Borough of - Local Plan
- •   Wycombe District Council

1.7   The approach taken by ORS reflected that taken within the Housing background paper and the Housing Background paper approach reflected that taken by Cambridge City Council whose plan was adopted in 2018 and included a policy to create accessible homes that delivered 100% of all new homes to M4(2) and 5% at M4(3).

1.8   The Housing Background Paper cited a number of national studies and applied these to Gloucester, in line with the NPPG guidance. These are referenced in the document and included the Lancet report (2017) *'Forecasted trends in disability and life expectancy in England and Wales up to 2025: a modelling study'*, NHS data on Wheelchair users and services[2] and Disability Sports factsheet on disabled people[3]

Household Projections

1.9   The LHNA sets out at paragraph 3.3 an estimated range of household growth of between 5,622 and 4,831 between 2019-29. It states that *'The new ONS method for household formation yields a higher growth than the 2016-based principal projection: sensitivity analysis 1 holds the HH formation rates at 2016 rates but shows that the new method increases the growth based on the previous 2014-base population projection to 5,001 households'*.

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[1] https://www.gov.uk/guidance/housing-optional-technical-standards)
[2] https://www.england.nhs.uk/wheelchair-services/
[3] http://www.disabilitysport.org.uk/facts-and-figures-about-disabled-people-in-the-uk.html

1.10   The household projections have an impact on likely need for adapted and adapted housing in particular when considered with changes in the demographic profiles.

Demographic Profile

1.11   Paragraph 6.2 of the LHNA highlights the issue of the increasing ageing population; '*Overall for Gloucestershire, the growth in the older population represents over 90% of the overall population growth; 63,368 persons from a total growth of 69,372 persons are projected to be aged 65 or over, including an increase of 20,218 persons aged 85 or over.*'

1.12   This is particularly important when establishing the types of housing required and the need for housing specifically for older people.

Figure 23: Population projections 2021-41 by 5-year age cohort for Gloucestershire (Source: ONS sub-national projections 2016)
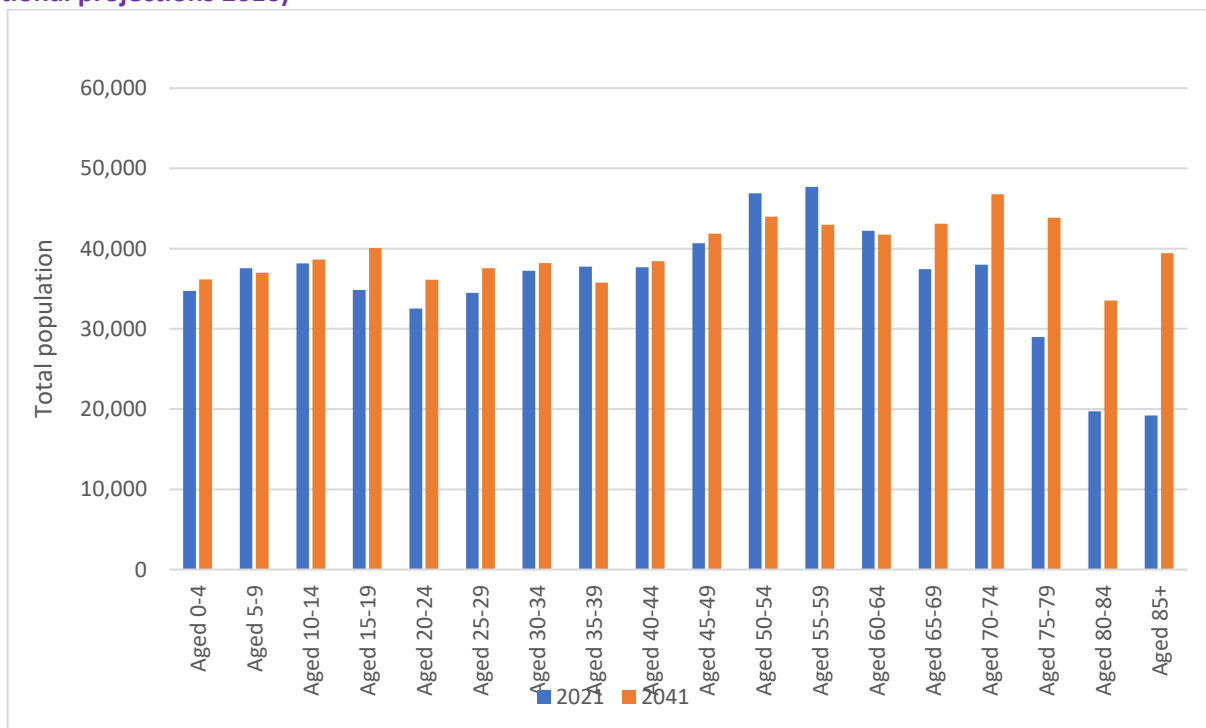
1.13   In relation to Gloucester the LHNA states in paragraph 6.4 that '…the growth in the older population aged 65 and over (12,130) is a large proportion, but smaller than the overall population growth of 16,783. There is growth in most of the under 65 age groups, particularly those aged 15 – 29.'

1.14   The Housing Background Paper provided evidence on the impact of increasing number of the population with a long-term health problem or disability which limited their day-to-day activities The LHNA provides an up to date view of this issue. Figure 77 identifies the number of households with one or more persons having a limiting long-term illness or disability and the likely impact on their housing needs, with further explanation in the following paragraphs.

	Local Authority						TOTAL
	Cheltenham	Cotswold	Forest of Dean	Gloucester	Stroud	Tewkesbury	
Households with one or more persons with a LLTI or disability	14,126	10,798	12,513	17,077	15,118	11,385	81,017
Does not affect housing need	9,612	7,078	8,450	11,824	10,205	7,632	54,801
Households where a LLTI or disability affects housing need	**4,513**	**3,721**	**4,063**	**5,254**	**4,913**	**3,753**	**26,216**
Current home suitable for needs	3,773	3,145	3,405	4,345	4,125	3,166	21,960
Current home needs adaptation	375	288	334	458	401	298	2,155
Need to move to a suitable home	365	287	323	450	387	289	2,101

'9.93 The analysis identifies that there will be around 81,017 households living in Gloucestershire in 2021 where one or more persons with a limiting long-term illness or disability. This includes around 26,216 households where their health problems affected their housing needs.

*9.94 Nevertheless, it is estimated that **in 2021 there will be around 2,101 households** needing to move to a more suitable home due to a disability or another long-term health problem. These households would represent an existing need for M4(2) housing, however some of these households would be wheelchair users needing M4(3) housing. A further 2,155 households needed adaptations to their current home…*

*9.97 Whilst around 26,216 households living in Gloucestershire in 2021 will have a health problem that will already affect their housing requirements, the ORS housing model cohort health analysis suggests **that it is likely that a further 12,095 households will develop health problems within 10 years**…*

*9.99 Continuing the modelling of health needs suggests that by 2041 there will be **an additional 34,160 households either already experiencing health problems or likely to develop health problems within 10 years.**'*

Current Housing Waiting List Data for Gloucester City

1.15 The following table provides information on from the Housing Registers (Gloucestershire Homeseeker) from the Locata system.

1.16 It provides more granular information regarding the city. It is an indication of demand for accessible and adapted homes in the city. However, it will not pick up much of the demand from such housing within the owners occupied sector. It is also a snap shot in time and does

not take into account factors such as increases in the aging population or increases in the number of households comprising of someone with a disability or a long-term limiting illness.

	WCU in household March 2021	Registered Disabled	Ground Floor or Lift Required
1 bed	70	285	370
2 bed	36	110	130
3 bed	23	62	56
4 bed	6	29	15
5 bed	1	7	3
6 bed	0	0	0
7 bed	0	0	0
8 bed	0	0	0
9 bed	0	0	0
Total WCU	**136**	**493**	**574**
% of Register (Silver to Emergency bands)	7%	27%	31%

1.17 As at the end of March 2021 the Housing Register showed that there were 1,853 applicants registered in the bands from Silver to Emergency i.e. in significant housing need.

Existing Supply Affordable Homes

1.18 509 affordable homes have been built to 'Lifetime Homes Standard' or M4(2) standard between 2004 and Q1 of 2021-22. Much of this delivery was driven by the Homes and Communities Agency Design and Quality Standards linking to the Life Times Homes Standard. These ceased to be requirements from 2016.

1.19 57 new homes have been built to wheelchair standard since 2007, initially these were built in line with the Habinteg Wheelchair User Guide, since 2018 10 homes a have been built to M4(3) Standards.

1.20 The Housing Background Paper estimated the need for wheelchair units to be approximately 97 households based on 2% of households having a wheelchair user and that 9% of these households were in unsuitable housing. To meet this need over a 5-year period this would require 19 homes built per annum to M4(3) and M4(3)b standards. The table below shows that the estimated increase in Households over the next ten years would increase the number of households with a wheelchair user and those with unmet need.

	Gloucester City % based on Habinteg Toolkit	Household Estimate used for Housing Background paper	Estimated Households LHNA including growth 2019-29 (ONS methodology)
		53658	58,659
No. of users with a wheelchair user	**2%**	1073	1173
Wheelchair user with an unmet housing need	**9%**	97	106