

Matter 4 – Type and Mix of Housing

Issue 3 – Accessible and Adaptable Housing

Q1 What are the requirements in Policy HOU4 based on and are they deliverable and viable?

- 1.1 The requirements in Policy HOU4 are based on evidence set out in the South West Herts Local Housing Needs Assessment Update 2024 (HOU 02.01) and are considered to be both deliverable and viable.
- 1.2 The LHNA 2024 addresses requirements for accessible and adaptable housing in detail, including at:

9.1 This section studies the characteristics and housing needs of the older person population and the population with some form of disability. The two groups are analysed within the same section as there is a clear link between age and disability. It responds to the NPPF (Para 63) which identifies the need to assess the need of older people and Planning Practice Guidance on Housing for Older and Disabled People published by Government in June 2019. It includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards).

9.2 The PPG on Housing for Older and Disabled People outlines that the need to provide housing for older people is critical, given the growth in the projected older population, and can help to provide older and disabled people with choice, to live safely and independently and to reduce costs to the social care and healthcare systems. It identified that needs assessments should consider the needs for specialist housing and for care homes, and for accessible and adaptable housing, and this can inform plan-making. Plans should set clear policies to address these needs including providing indicative figures or a range for the number of specialist housing units needed over the plan period. It is up to planning authorities whether to allocate sites to meet specialist housing needs, but the PPG advises that doing so can provide greater certainty for developers and encourage provision in suitable locations. The PPG in addition provides guidance on inclusive design.

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9.19 The projected change shown in the number of people with disabilities provides clear evidence justifying delivering 'accessible and adaptable' homes as defined in Part M4(2) of Building Regulations, subject to viability and site suitability. The Councils should ensure that the viability of doing so is also tested as part of drawing together its evidence base although the cost of meeting this standard is unlikely to have any significant impact on viability and would potentially provide a greater number of homes that will allow households to remain in the same property for longer.

Accessible and Adaptable Homes

9.67 The PPG sets out that delivery of accessible and adaptable homes have an important role to play in enabling people to live independently. Planning policies for accessible and adaptable homes (Class M4(2)) and wheelchair-user dwellings (Class M4(3)) need to be based on evidence of need and viability; and policy application needs to take account of site-specific factors such as topography and the potential for level access.

9.68 In respect of accessible and adaptable homes, the analysis earlier in this section has pointed to a very substantial increase in those with mobility problems and impaired mobility, which supports policies seeking provision of new homes which meet Class M4(2) standards – these are properties which can be adapted to meet households changing needs in situ, such as by providing for level access, minimum corridor and doorway widths and living area at entrance level.

9.69 The analysis below draws on secondary data sources to estimate the number of current and future wheelchair users and to estimate the number of wheelchair accessible/adaptable dwellings that might be required in the future. Estimates of need produced in this report draw on data from the English Housing Survey (EHS) – mainly 2018/19 data. The EHS data used 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.

9.70 The table below shows at a national level the proportion of wheelchair user households by the age of household reference person. Nationally, around 3.4% of households contain a wheelchair user – with around 1% using a wheelchair indoors. There is a clear correlation between the age of household reference person and the likelihood of there being a wheelchair user in the household.

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9.72 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. We therefore need to consider what proportion of homes might not be suitable for wheelchair users, or cannot be adequately adapted. 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 ‘visitable’ – this is around 25% of wheelchair user households.

9.73 Applying this to the current number of wheelchair user households and adding the additional number projected forward suggests a need for around 3,700 additional wheelchair user homes in the 2021-41 period. If the projected need is also discounted to 25% of the total (on the basis that many additional wheelchair user households will already be in accommodation), this leads to a need estimate of 2,100 homes. These figures equate to a need for 103-185 dwellings per annum. These figures and for individual local authorities are shown in the tables below.

Table 9.23 Estimated need for wheelchair user homes, 2021-41

		Current need	Projected need (2021-41)	Total current and future need
Dacorum	Total	429	580	1,009
	@ 25% of projection	429	145	574
Hertsmere	Total	296	422	718
	@ 25% of projection	296	106	402
St Albans	Total	321	416	737
	@ 25% of projection	321	104	425
Three Rivers	Total	235	349	584
	@ 25% of projection	235	87	322
Watford	Total	241	404	645
	@ 25% of projection	241	101	342
South West Herts	Total	1,522	2,172	3,694
	@ 25% of projection	1,522	543	2,065

Source: English Housing Survey; 2021 Census and demographic projections

9.74 Furthermore, information in the EHS (for 2018/19) also provides national data about wheelchair users by tenure. This showed that, at that time, around 7.1% of social tenants were wheelchair users (including 2.2% using a wheelchair indoors), compared with 3.1% of owner-occupiers (0.7% indoors). These proportions can be expected to increase with an ageing population but do highlight the likely need for a greater proportion of social (affordable) homes to be for wheelchair users.

Table 9.24 Proportion of wheelchair user households by tenure of household reference person – England

Tenure	No household members use a wheelchair	Uses wheelchair all the time	Uses wheelchair indoors only	Uses wheelchair outdoors only	TOTAL
Owners	96.9%	0.5%	0.2%	2.4%	100.0%
Social sector	92.9%	1.6%	0.6%	4.8%	100.0%
Private renters	98.8%	0.1%	0.1%	0.9%	100.0%
All households	96.6%	0.6%	0.3%	2.5%	100.0%

Source: English Housing Survey (2018/19)

9.75 To meet the identified need, the Councils could seek a proportion (maybe up to 5%) of all new market homes to be M4(3) compliant and potentially a higher figure in the affordable sector (say 10%). These figures reflect that not all sites would be able to deliver homes of this type. In the market sector these homes would be M4(3)A (adaptable) and M4(3)B (accessible) for affordable housing.

9.76 As with M4(2) homes it may not be possible for some schemes to be built to these higher standards due to built-form, topography, flooding etc. Furthermore,

provision of this type of property may in some cases challenge the viability of delivery given the reasonably high build out costs (see table below).

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9.80 As well as evidence of need, the viability challenge is particularly relevant for M4(3)(B) standards. These make properties accessible from the moment they are built and involve high additional costs that could in some cases challenge the feasibility of delivering all or any of a policy target.

9.81 It will be for viability evidence to consider specifically the costs of delivering homes at M4(2) and M4(3) standards. Our experience is however that the costs of meeting M4(3) standard can be notably higher than those for M4(2).

9.82 It should be noted that local authorities only have the right to request M4(3)(B) accessible compliance from homes for which they have nomination rights. They can, however, request M4(3)(A) adaptable compliance from the wider (market) housing stock.

9.83 A further option for the Councils would be to consider seeking a higher contribution, where it is viable to do so, from those homes to which they have nomination rights. This would address any under delivery from other schemes (including schemes due to their size e.g. less than 10 units or 1,000 square metres) but also recognise the fact that there is a higher prevalence for wheelchair use within social rent tenures. This should be considered when setting policy.

- 1.3 As set out above, the LHNA 2024 provides evidence that the approach taken in Policy HOU4 is reasonable, deliverable and viable.
- 1.4 The BNPPRE Local Plan Viability Report SADC (2024) (INF 10.01) provides evidence that the policy approach in HOU4 is deliverable and viable. The report addresses accessible and adaptable housing directly, including at:

P12 - Table 2.38.1: Emerging policies with Cost Implications

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HOU4	Accessible and Adaptable Housing All residential development (Use Class C3) to achieve compliance with Building Regulations Part M4(2) and for residential development proposals of for 10 homes or more (Use Class C3) 5% of market dwellings to comply with Part M4(3)(a) and 10% of affordable housing dwellings (rent and home ownership) to comply with wheelchair standard Part M4 (3)(b) of the building regulations.	Cost uplifts for achieving these standards reflected in the appraisals.
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Accessibility Standards

4.23 We have tested the impact of applying accessible and adaptable dwellings standards (Category 2 and Category 3) at the rates summarised in Table 4.23.1. These costs are based on the MHCLG 'Housing Standards Review: Cost Impacts' study but converted into percentages of base construction costs so that they can be applied to contemporary costs.

Table 4.23.1: Costs of accessibility standards (% uplift to base construction costs)

Standard	Flats	Houses
M4(2) accessible and adaptable	1.15%	0.54%
M4(3) (a) wheelchair user - adaptable	9.28%	10.77%
M4(3) (b) wheelchair user - accessible	9.47%	23.80%

4.24 Our appraisals assume that all units are constructed to meet wheelchair accessibility standards (Category 2) and that Category 3(a) applies to 5% of the market housing dwellings (sites of 10 units and more) and Category 3(b) applies to 10% of the affordable housing units (rented and shared ownership). These costs address both parts A and B of the requirements (i.e. that the communal areas are designed and fitted out to allow wheelchair access and also that the dwellings themselves are designed and fitted out to facilitate occupation by wheelchair users)

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Conclusions and recommendations

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Accessibility : We have tested the impact of the Council's emerging policies in relation Accessibility and our costs to reflect Building regulations Part M4(2), Part M4(3)(a) and Part M4(3)(b) have a modest impact on residual land values and can therefore be viably absorbed.

- 1.5 N.B. A Main Modification (as set out in SADC/ED85A and SADC/ED85C) is proposed for Policy HOU4 as follows:

Amend Policy HOU4 as follows:

The Council will support development proposals which:

- a) Provide new accessible and adaptable housing which meets the changing lifetime needs of the occupants;*
- b) For all residential development (Use Class C3) achieve compliance with the required Building Regulations (Part M4(2)) (or equivalent) except where this is not possible for viability or other reasons such as built form, topography and flooding;*
- c) For residential development proposals for 10 homes or more (Use Class C3) 5% of market dwellings comply with Part M4(3)(a) of the Building Regulations (or equivalent) and 10% of affordable (rent and home ownership) dwellings comply with Part M4(3)(b) (wheelchair user dwellings) of the Building Regulations (or equivalent); and*
- d) For M4(2) and M4(3) housing are located, where possible, with good access to public transport and local facilities.*

- 1.6 Overall, the requirements in Policy HOU4 are based on evidence set out in the South West Herts Local Housing Needs Assessment Update 2024 (HOU 02.01) and are considered to be both deliverable and viable.