



National Planning Policy Framework Consultation proposals (Ministry of Housing, Communities and Local Government)

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About Age UK

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances. In the UK, the Charity helps more than seven million older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people. Its work focuses on ensuring that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe and secure at home; and feel valued and able to participate. Age UK's subsidiary charity, Age International, supports older people globally in over 30 developing countries by funding programmes such as vital emergency relief and healthcare and campaigning to raise awareness and change policies.

About this consultation

The Government consultation on the National Planning Policy Framework is linked to measures set out in the Government White Paper 'Fixing Our Broken Housing Market' to increase the supply of new homes and reach the target of 300,000 homes each year. This consultation is also linked to previous consultations and consists of several documents including the National Planning Policy Framework (NPPF) - consultation proposals and draft text as well as Draft Planning Practice Guidance.

The draft NPPF clarifies considerations local authorities should take into account in devising their strategic plans – including accessible design. The Draft Planning Practice Guidance sets out factors local authorities should consider when looking at the housing needs of older people. These are fairly general and provide a signpost to other resources. The mention of older people in the draft NPPF continues to be limited. However, in the summer, the Ministry of Housing, Communities and Local Government (MHCLG) is due to release specific guidance on the housing needs of older and disabled people (Age UK participated in the detailed consultation for this guidance). This is a requirement of the Neighbourhood Planning Act 2017 and will work alongside the final NPPF.

The consultation asks whether the Government should remove the requirement on local authorities to devise a Local Plan – which sets out a detailed approach towards developments in specific places and is subject to community consultation. There will remain an obligation to produce a Strategic Plan linked to broad principles set out in

the National Planning Policy Framework. Detailed Neighbourhood Plans will remain in place.

1. Key points and recommendations

- The proposed removal of obligations to devise a Local Plan could undermine the delivery of measures and targets on **accessible and healthy home design** to promote independence and wellbeing.
- Demographic changes as the result of an ageing population should require all local authorities to have a **Local Plan** that directly addresses the **housing needs of older people** across all tenures. Catering for an ageing population should be part of the definition of **sustainable development**.
- We welcome new **guidance on housing for older and disabled people** under the Neighbourhood Planning Act 2017. However, at this stage, it is unclear what impact the guidance will have in relation to the draft NPPF, especially in the absence of the requirement for a Local Plan.
- There is insufficient detail in the guidance on planning strategies designed to deliver **suitable housing options for older people** – despite the opportunity to increase the supply of larger homes for young families.
- The NPPF should operate in tandem with enhancements to the building regulations to deliver higher **accessibility standards** and features for all new homes. The optional 'Category 2' standard based on the lifetime homes standard should be made obligatory for all new homes. There should be a target to ensure 10% of new homes are **wheelchair accessible**.
- The draft NPPF gives little attention to encouraging improvements in the quality of the **private rented sector**, including build to rent. With the projected increase in the number of older private rented tenants, planning must help to improve the quality of this tenure for future generations.
- The NPPF does not do enough to encourage the development of **retirement housing** to rent and buy for both lower income and better off older homeowners. The NFFP should specify the need to identify suitable locations linked into local transport hubs and key services. It should also be linked to the reform of planning class categories to reduce the development cost for specialist housing. .
- The revised NPPF should do more to encourage the **improvement and refurbishment** of existing homes that help older people to remain independent. As well as increasing the supply of homes the NPPF needs to encourage a

strategic approach to improvements in the existing housing stock – especially for vulnerable groups.

- If the NPPF reduces obligations under the **Climate Change Act 2008**, it could have a detrimental impact on many older people who are particularly at risk in cold weather or heatwaves. Strategic planning should have a key role in reducing the number of cold homes and homes that overheat in warm weather.

2. Introduction

Projected increases in the number of older households across the UK will create enormous challenges for housing and the built environment. Strategic planning should respond to this challenge and help to create the conditions that allow more of us to remain independent and in control of our lives as we get older. An effective strategic planning framework and vision for the future is not just important for new homes and improvements to existing homes but will fundamentally impact on the way we access social and health care and the way we engage with our local communities.

For Age UK the question is whether the revised National Planning Policy Framework (NPPF) and guidance provides a robust basis to address the housing needs of older people. To do so it must be linked to tangible improvements, such as progress on the building regulations to deliver accessible and flexible housing. The housing market on its own cannot deliver the changes we need partly because most people do not fully consider the accessibility of their home or environment until they find themselves struggling remain independent or are forced to move into residential care.

Strong planning guidance at national and local level should help to address the rising costs and demand placed on the NHS and social care system. The MHCLG should work with the DHSC to ensure that local planning is used to ensure the smooth delivery of social care reforms as part of the forthcoming Social Care Green Paper.

Removing the requirement to devise a Local Plan will curb the implementation of detailed measures to deliver accessible and healthy homes. We believe this could be counter to local authorities meeting their Public Sector Equality Duties under the Equality Act 2010. We also question definitions of affordability contained in the draft NPPF (based on 80 per cent of market rent rather than income) which fails to offer truly affordable lower rent housing.

3. Consultation response

Local Plans and Equality Act 2010

Despite improvements to the draft NPPF and practice guidance we are concerned about the implications of removing local authorities' obligation to devise a Local Plan. This could worsen an already unsatisfactory situation. Less than 10 per cent of local authorities have policies on older peoples' housing and specific site allocation. In addition, some local authorities continue to block housing schemes for older people

because they believe this will lead to increased demand on social care budgets. This is incorrect, because in fact planning and developing good retirement housing should allow older people to remain independent for longer and eases pressure on local care budgetsⁱ.

The absence of a local planning strategy for older people's housing makes it easier for some local authorities to ignore older people's needs and aspirations. Age UK believes that increases in the number of older household's warrants a specific requirement on all local authorities to have a housing strategy for older people with specific measures set out in the Local Plan. The possible removal of obligations to produce a Local Plan at all would be an unhelpful step in this respect.

Lifetime homes and age friendly places

We recognise that approaches to planning age friendly or dementia friendly places will vary depending on location. Given this, a strategic approach based on clear principles is needed to allow local authorities discretion based on local conditions. However, planners across all local authorities need to apply consistent accessibility guidance and standards, regardless of where older people live.

We want to see advances in the building regulation to make 'Category 2' compliance (based on the lifetime homes standard) obligatory for all new homes. Planning should promote improved space standards to make it easier for older people to adapt their homes. Planners need to recognise that although people may need less space as they age, housing still must be designed with sufficient space to make downsizing an appealing proposition.

We would like to see the NPPF encourage the development of bungalow housing connected to key services to make developments sustainable.

Age UK has particular concerns that viability assessments could be used to bypass measures to meet accessible housing standards under the building regulations. We hope the revised position on viability will place more priority on longer term benefits for local communities, rather than short term interests and costs to the developer, by putting greater emphasis on outcomes such as relieving pressure on local NHS and social care systems.

Planning and assessing the needs of older people

Planning relies on local authorities having accurate data about the housing needs of the population. At an expert planning seminar, organised by Age UK and ILCⁱⁱ, attendees agreed that 'there are huge gaps in knowledge at a local level', which consequently create difficulties in 'both mapping what we have, noting where the gaps are, and conveying information to describe the different options available to older people'. A report by Leonard Cheshire Disabilityⁱⁱⁱ that found that only 16 per cent of councils could provide data on whether homes were wheelchair accessible, and only 10 per cent could provide data on lifetime home standards. Habinteg Housing Association found that only 8.2 per cent of local authorities could produce data on accessible housing when requested. The Planning Practice Guidance refers to the importance of assessing the needs of older and disabled people, but provides limited

advice. We hope the forthcoming guidance on older and disabled people will help to address this.

Social care green paper and housing options for older people

The planning system should encourage a range of housing options for older people to make it easier to downsize to a more manageable environment. The NPPF should be linked to the forthcoming Government Green Paper on social care to look at delivering suitable housing for older people that facilitates care and support at home.

We would also like to see the NPPF making it easier to develop extra care and specialist housing. This should be linked to suggested reform of the planning use class system and identifying suitable sites in good locations close to key local services and transport links that help older people to stay independent. Although the majority of older people want support while continuing to live in mainstream housing there is a growing demand for retirement housing in privately leased or rented schemes, as well as sheltered social rented housing, which is not being met.

Safe and supportive environments

The Grenfell Tower Inquiry has led to questions over the role of planning to ensure safety in the refurbishment of existing building and new housing developments, which as the same time proactively engage with the local community on safety and design issues. Planning policies need to give greater consideration to vulnerable older people with restricted mobility living in high rise flats, by including measures to guarantee their safety in an emergency.

Responding to climate change

Planning policy needs to consider the impact of climate change on people who may be in vulnerable circumstances, including disabled and older people. This includes flooding, but also heatwaves. We are very concerned by reports that up to 20 per cent of homes may exceed defined thresholds for overheating^{iv}. Planning and building regulations in general need to do more to take into account the risk of overheating, finding holistic solutions to both cold and hot weather to ensure that everyone can live in comfort.

ⁱ DEMOS (2017) The Social Value of Sheltered Housing. Available online - <https://www.demos.co.uk/project/sheltered-housing/>

ⁱⁱ Housing of Common planning roundtable event - ILC/Age UK 20/11/17

ⁱⁱⁱ LCD (2014) No place like home. Available online - <https://www.leonardcheshire.org/sites/default/files/no-place-like-home-leonard-cheshire-disability.pdf>

^{iv} <http://www.zerocarbonhub.org/sites/default/files/resources/reports/ZCH-OverheatingInHomes-TheBigPicture-01.1.pdf>