



Consultation Response

Proposed reforms to the National Planning Policy Framework and other changes to the planning system

Ministry of Housing, Communities and Local Government

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About this consultation

This consultation seeks views on the Government's proposed approach to revising the National Planning Policy Framework which aims to achieve sustainable growth in our planning system. It also seeks views on a series of wider policy proposals in relation to increasing planning fees, local plan intervention criteria and appropriate thresholds for certain Nationally Significant Infrastructure Projects.

About Age UK

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and around 120 local Age UKs across England, to help everyone make the most of later life, whatever their circumstances. In the UK, the Charity helps millions of older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people.

Introduction and key points

Households headed by someone over the age of 65 are forecast to account for 84% of the growth in households between 2018 and 2043ⁱ but the current National Planning Policy Framework is not producing the number or type of homes that older people need. Age UK would like to see further reforms in addition to those proposed to ensure that local authorities properly assess local need for older people's housing and build what is required.

Good housing is key to an older person's well-being but also to the cost of caring for an ageing population.

One aspect of cost saving that isn't often discussed is the extent to which good housing sustains unpaid care. It is much easier to help a family member or friend with the odd task once a day, than go morning and evening to help someone get in and out of a bath, climb stairs, cook meals and so on. The value of unpaid care is estimated at £162bn pa.ⁱⁱ

The glossary to the National Framework defines older people 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 specialised housing for those with support or care needs."ⁱⁱⁱ

Guidance emphasises the range of lifestyle and health needs that this broad group will have and refers to inclusive design, the HAPPI principles and mainstream housing as well as specialist housing built specifically for older people.

However, too often, assessments of local need for older people's housing focus on a few housing types and only consider a small part of this diverse group.

Analysis is often limited to specialist homes built specifically for older people and where mainstream housing is considered, to a proportion of accessible homes and encouraging more people to downsize. Even within this limited view, the numbers planned do not match real need. The Elderly Accommodation Council estimates that less than 7,500 units of specialist housing will be built in 2024 across the whole of the UK.

A reformed NPPF must:

Ensure local authorities undertake more detailed assessment of the needs of older people, particularly within mainstream housing: Assessments rarely set out a detailed analysis of what different groups of older people really need within the mainstream sector. Few, for example, consider the third of homeowners aged 50 who will have moved home by the age of 70 or of older renters approaching retirement, many of whom will be unable to afford their current rent in retirement. 60% of renters aged 50 will have moved by the age of 70 and together with the third of homeowners this amounts to a substantial proportion of the older population.

By ignoring the housing needs of just these two groups – and there are others - we are missing an opportunity to help over a third of older people, moving anyway, to find homes where they can age well and independently. Older renters need age-friendly, accessible, affordable build to rent and in some cases social housing. 50- to 70-year-olds homeowners may still be working, have older children at home and need homes that suit both their current life but also a time when they may be less mobile or have cognitive issues.

Ensure local plans recognise that people are likely to age in homes they move to when younger and embed age friendly and inclusive design: With large numbers already moving, encouraging more people to downsize is easier in theory than in practice.

- As the figures above suggest, large numbers of older people are moving home anyway.
- Downsizing does not add up financially in many parts of the country.
- 80% of older people already live in homes with 3 beds or less.^{iv}
- A deep-seated knowledge of a home and long-standing community are key to ageing, particularly for those with dementia.
- The decision to move home involves assessing many different factors such as future care needs, where friends and family might be living, house prices, pension adequacy, investment returns, rent levels and care costs. These factors are easier to evaluate at older ages, but we know that people become less keen on moving home as they age.

So, we need to accept that many old people are making the right decision for their set of circumstances when they choose to age in place.

We must therefore plan on the assumption that many people will age in homes they moved to when younger and homes need to be adaptable for many stages of life. People will move to homes aged 40, 50 and upwards and remain there into later life. Building with inclusive design and to the higher accessibility standards of part M4 category 2 of the building regulations is essential if we hope to meet the housing needs of an ageing population.

Optional standards have not produced the number of homes required. Category 2 standards have to be mandatory.

Age UK would like to see revisions to the framework, in addition to those suggested in this consultation, that ensure the Government's ambitious building plans really provide the kinds of homes that an ageing population needs. Much can be done by adjusting what is being built anyway and without significant additional cost.

1. Local plans should be supplemented with clear guidance on how councils will specifically meet the needs of an ageing population, reflecting the full range of health and lifestyle needs identified in the glossary definition.
2. Given that the current wording is not translating into a sufficiently detailed analysis of what categories of housing older people might need within the mainstream sector, the

wording must emphasise this element. It may require a check list of different groups and tenures and examples of what should be considered.

3. Part M4 Category 2 must be mandatory for all new build and a minimum of 10% of homes built to Category 3. Inclusive design must become mainstream.
4. The reforms must address the planning barriers hindering specialist housing providers, for example providing a clearer methodology for assessing need, guidance on use classes and viability, more site allocation and greater awareness of the wider benefits.

Responses to specific questions

QUESTION 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes.

Even with reform, the private rented sector will remain a difficult tenure for some older people.

Much can be done to drive up standards and increase the number of age friendly, accessible private rented homes. Reform can improve access to adaptations, but many older people will still struggle to find affordable rents and a secure tenure. Tenants will still be asked to leave in certain circumstances, facing upheaval, risking the loss of a local support network and in some cases changes in doctors and care packages. With older private renters on average spending nearly 40% of their income on rent, affordability will remain an issue.^v

We need to accept that for some groups, even a reformed private rented sector is not suitable, and many require social housing. The numbers are set to increase with demographic change. Over 50% of renters aged between 45 and 64 have no savings and many will struggle to afford their rent in retirement.^{vi} The Pensions Policy Institute (PPI) estimates that if current trends continue the cost of housing benefit for older renters will increase by 40% in 2041, an additional £2bn pa.^{vii}

With a shortage of age friendly general needs social housing, all new housing, including social rented housing, must be built to Part M4 Category 2 standards and with inclusive design. We also need more homes to Category 3. A third of those who needed Category 3 homes in 2022/2023 were placed in social homes which were not accessible or adapted for wheelchair use.^{viii}

More accessible stock would not only mean more tenants living in appropriate homes but also reduce voids and delay. Inclusive design means that a home will work for tenants with differing needs and makes allocating homes easier.

Much age friendly design can be done without significant extra cost and would reduce the need for subsequent costly adaptations. Over half of the £623m Disabled Facilities Grant budget is spent on putting in walk-in showers which cost nearly 40% less in a home built to the higher Category 2 accessibility standards.^{ix}

The NPPF framework needs to ensure provision of more social homes but importantly, those homes must have the right structure to meet the needs of an ageing population.

QUESTION 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes.

Too often older people's housing is seen as a separate category. Assessment of what older people need is often limited to a discussion about different types of specialist housing, a narrow view of downsizer homes and a proportion with higher accessibility standards.

This ignores the needs of the vast majority. Over 90% of older people currently live in mainstream homes and even with a step change in both supply and demand for specialist housing, the vast majority will continue to do so.

Promoting a mix of tenures and types is an opportunity to build a broader range of homes and address the needs of older people within mainstream development.

There is, for example, a large group of older people moving home between the ages of 50 and 70 who do not have adequate options. Only 3.4% of older people move each year, which is considerably less than younger age groups, and so there is a common assumption that older people in general do not move home. However, over the years these moves accumulate, and the Institute for Fiscal Study's research suggests that over a third of homeowners and over 60% of renters aged 50 will have moved by the age of 70.^x

70% of over 55-year-olds say that a strong motivation behind considering a move is wanting a home better designed to meet their needs as they age.^{xi} However, most do not manage to find one. Only a third, for example, buy a home with the potential to have a bedroom on the same floor as the kitchen/sitting room.^{xii} Many in this group are not looking for a traditional idea of "older people's housing". Anecdotally, we hear of older people moving into new build homes marketed to younger age groups.

This is just one group of older people who need more new build solutions which the current framework doesn't adequately address and there are others. Our answer to question 47 on social rent, for example, refers to older renters who also need solutions.

How a policy to promote mixed tenure and type is worded though is important. It needs to actively encourage planners to think about the range of housing different groups of older people need, looking way beyond the limited focus on specialist housing and downsizer homes.

The consultation document on mixed tenure and type reads:

"This can include a mixture of ownership and rental tenures, including rented affordable housing and build to rent, as well as housing designed for specific groups such as older people's housing and student accommodation, and plots sold for custom or self-build."

Once again, older people are referred to as a part of "housing designed for specific groups". They also need to be considered in general mainstream housing. The 60% of renters who move between the ages of 50 and 70 need age friendly build-to-rent, for example, rented homes which will appeal to someone aged 50 but designed to help them live well and independently if they become less mobile with clear and positive policies on home adaptations.

Promoting mixed tenure and type within mainstream is an opportunity to get local plans to really address this broad definition of older people which isn't currently getting sufficient attention.

QUESTION 59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to ‘beauty’ and ‘beautiful’ and to amend paragraph 138 of the existing Framework?

No.

We need to make additional changes to ensure that “well-designed” includes inclusive, accessible design. Part M4 Category 2 of the building regulations has to be mandatory for all new build. Category 2 includes basic features that many older people will need such as walls strong enough to take a grab rail or plumbing which allows a shower to be installed instead of a bath.

Households headed by someone over the age of 65 are forecast to account for 84% of the growth in households between 2018 and 2043.^{xiii} The vast majority will be living in mainstream homes.

We have a huge shortage of accessible homes. Accessibility statistics for our existing stock have been well aired - only 9% of homes have the four features that allow a wheelchair to just visit, not actually live in a home.^{xiv} Much of our existing housing stock has steep narrow staircases, bedrooms on an upper floor, baths to climb in and out of and steps up to a front door. We need new build to address this shortage.

We can't second guess where an older person will live and match a certain number of accessible homes with those who need them. People move to a home aged 30, 40 or 50 and may well stay there as they age. People may have older family members to live with them either permanently or temporarily and need accessibility. In order to get developers to build to this standard they need to be competing to buy land for sites on a level playing field, with all other builders subject to the same requirements.

In terms of practical day to day living, this goes beyond Part M4 Category 2 and is also about inclusive design (an oven at waist height not at the bottom of a stack, good lighting etc.). Well-designed homes work for people at all stages of life and allow flexibility.

Optional standards haven't produced the number of accessible homes we need. Only 31.5% of new homes to be built in England 2020-2030 under the current system will meet Category 2 accessibility standards.^{xv} Higher accessibility standards have to be mandatory to start to address this shortage.

Much can be done without additional cost. Many design features are cost neutral and, in many instances, good design will mean that the extra space required for Category 2 will not result in a loss of density. With mandatory Category 2, processes will become standard.

There will be some cases though where building to Category 2 will be more expensive and there are a number of studies which attempt to quantify the social and fiscal benefits of the higher standards. One aspect of cost saving that isn't often discussed is the extent to which good housing sustains unpaid care. It is much easier to help a family member or friend with the odd task once a day, than go morning and evening to help someone get in and out of a bath, climb stairs, cook meals and so on. The value of unpaid care is estimated at £162bn pa.^{xvi}

QUESTION 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Certain basic standards need to be set at a national level so that discussions about viability do not dilute the key elements that all homes should have. This would also provide clarity,

simplicity and avoid the back and forth between planners and developers that contributes to delay.

Given the extent of demographic change, the shortage of housing that is suitable for our ageing population and the health impact of this shortage, the higher accessibility standards of Part M4, Category 2 need to be included as part of this mandatory basic standard. As referred to in our answer to question 59, the current system is not producing the type and number of homes an ageing population needs.

An older person living in an appropriate home and within an accessible, age-friendly community is more likely to be able to live independently without help. Conversely, those in the wrong kind of home are more likely to need help washing and getting up, buying food, cooking and undertaking other daily tasks. Category 2 homes have many age-friendly features in place, avoiding the need for costly later adaptations. Where an adaptation is needed the cost of installation is significantly lower and it is much easier to do. The impact of the right kind of housing goes way beyond the ability to undertake that one particular task. One study following up a group of older people after the installation of a walk-in shower showed that it gave people autonomy and a confidence that had wider implications for their participation in many other aspects of life.^{xvii}

Age-friendly, accessible homes and communities are essential for the health of individual older people but also the cost of caring for an ageing population. The basic standards need to be set as mandatory within the national framework.

QUESTION 106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

The housing needs of older people are not properly addressed in these current proposals. We need to ensure that Part M4 Category 2 is mandatory for all new build and that local plans build for all groups of older people – those who need specialist housing but also the different groups within the vast majority who will live in mainstream housing. We need a broad, nuanced and detailed assessment of what older people need incorporated into all local plans.

Local plans should be supplemented with clear guidance on how councils will specifically meet the needs of an ageing population. The wording needs to ensure that this goes beyond an assessment of specialist units and encouraging more people to downsize. Large numbers of people are moving anyway and currently into homes that do not meet their longer-term needs. Encouraging more to do so is difficult. Downsizing is more difficult in practice than theory.

Supplementary guidance must look at general mainstream housing, identifying older groups with particular needs, such as the 50- to 70-year-olds or renters, as well as homes specifically designed for older people and ensure that we build flexible homes, adaptable to people's changing needs which really meet the needs of our ageing population.

ⁱ [Household projections for England - Office for National Statistics](#)

ⁱⁱ [Unpaid care in England and Wales valued at £445 million per day | Carers UK](#)

ⁱⁱⁱ [National Planning Policy Framework: draft text for consultation \(publishing.service.gov.uk\)](#)

^{iv} Age UK analysis of data from the Office for National Statistics' 2021 Census for England and Wales

^v [English Housing Survey 2021 to 2022: private rented sector - GOV.UK \(www.gov.uk\)](#)

^{vi} [English Housing Survey 2021 to 2022: private rented sector - GOV.UK \(www.gov.uk\)](#)

^{vii} [pensionspolicyinstitute.org.uk/media/fjgl1kv/202311-the-uk-pensions-framework-final2.pdf](#)

^{viii} [Social housing lettings in England, tenants: April 2022 to March 2023 - GOV.UK \(www.gov.uk\)](#)

ix [DFG Review 2018 Summary.pdf \(publishing.service.gov.uk\)](#)

[Adaptations to older homes could cost households thousands: Habinteg | Latest news | Habinteg Housing Association](#)

x https://ifs.org.uk/sites/default/files/output_url_files/BN239.pdf

xi https://www.housinglin.org.uk/_assets/Resources/Housing/OtherOrganisation/11756-AgeFriendly-Report-FINALpdf.pdf

xii [DownloadTemplate 4.pdf \(cam.ac.uk\)](#)

xiii [Household projections for England - Office for National Statistics](#)

xiv [2018-19 EHS Adaptations and Accessibility Fact Sheet.pdf \(publishing.service.gov.uk\)](#)

xv [Insight report: A forecast for accessible homes | Habinteg Housing Association](#)

xvi [Unpaid care in England and Wales valued at £445 million per day | Carers UK](#)

xvii [Original research: Bathing adaptations in the homes of older adults and their carers \(BATH-OUT\): a qualitative extended follow-up study with concurrent nested outcome assessments - PMC \(nih.gov\)](#)