
**Additional Evidence to Support Policy HO4, Specialist
and Adaptable Housing**

**Local Plan Examination of the Nottingham Local Plan
Part 2, Land and Planning Policies Document**

Nottingham City Council

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**Nottingham
City Council**

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1 Background

- 1.1 In her note of January 2019, the Inspector sets out her thinking on several key matters under her consideration. For Policy HO4, Specialist and Adaptable Housing, she concludes:

“The need for policy HO4 is not sufficiently clearly evidenced in the light of the Written Ministerial Statement of March 2015 and the relevant Planning Practice Guidance. It should therefore be deleted unless further clear evidence can be produced sufficient to fully justify the policy.”

- 1.2 This paper responds to the Inspector’s request for further clear evidence.

2 Policy HO4, Specialist and Adaptable Housing

2.1 Policy HO4 as currently drafted is as follows:

- 1. Planning permission for new residential development above a threshold of 10 or more dwellings will be granted subject to a target of at least 10% of new dwellings being developed as 'Accessible and Adaptable' dwellings.**
- 2. In residential areas planning permission will be granted for specialist housing for older people, other vulnerable groups and for hostel accommodation provided that:**
 - a) a satisfactory residential environment can be achieved for the benefit of the intended occupants;**
 - b) the amenity of existing local residents would not be compromised;**
 - c) the use would not result in over-concentration of similar uses in any one area leading to a material change in character;**
 - d) the site is accessible to public transport and other services; and**
 - e) there will be satisfactory management arrangements in place to ensure amenity of nearby occupiers is maintained.**

3 National Policy Background

3.1 The national policy context includes the National Planning Policy Framework (NPPF), the Planning Practice Guidance and the 2015 Ministerial Statement. Each is now dealt with in turn.

a) NPPF

3.2 The 2012 NPPF (which is very similar to the 2018 NPPF) includes the following relevant excerpts:

Para 50. “To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);”

3.3 Para 159. “Local planning authorities should have a clear understanding of housing needs in their area. They should:

- prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
 - meets household and population projections, taking account of migration and demographic change;
 - addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);”

b) 2015 Ministerial Statement

3.4 The 2015 Ministerial Statement post-dates the 2012 NPPF and states:-

“The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance.

Neighbourhood plans should not be used to apply the new national technical standards.”

- 3.5 Accessible and adaptable housing (Category 2 in the Building Regulations) are included in the national technical standards, and are therefore subject to the Ministerial Statement.

c) Planning Policy Guidance (PPG)

- 3.6 PPG provides further detail and interpretation of the NPPF. The relevant excerpts from the PG are:

“What optional technical housing standards can local planning authorities set?”

Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.

Mandatory Building Regulations covering the physical security of new dwellings came into force on 1 October 2015 and planning authorities should no longer seek to impose any additional requirements for security of individual dwellings through plan policies, though designing for security of site layout remains a valid planning consideration.”

Paragraph: 002 Reference ID: 56-002-20160519

“Accessibility and wheelchair housing standards

Can local planning authorities require accessibility, adaptability and wheelchair standards in new dwellings?

The National Planning Policy Framework (NPPF) is clear that local planning authorities should plan to create safe, accessible environments and promote inclusion and community cohesion. This includes buildings and their surrounding spaces. Local planning authorities should take account of evidence that demonstrates a clear need for housing for people with specific housing needs and plan to meet this need.

How should local planning authorities assess the need for accessibility requirements?

The National Planning Policy Framework requires local planning authorities to have a clear understanding of housing needs in their area, including those for people with specific housing needs. The Framework provides guidance on the methodology that can be used to undertake the needs assessments.

Paragraph: 006 Reference ID: 56-006-20150327

What evidence should local planning authorities use to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards?

Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

- the likely future need for housing for older and disabled people (including wheelchair user dwellings).
- size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
- the accessibility and adaptability of existing housing stock.
- how needs vary across different housing tenures.
- the overall impact on viability.

To assist local planning authorities in appraising this data the government has produced a summary data sheet. This sets out in one place useful data and sources of further information which planning authorities can draw from to inform their assessments. It will reduce the time needed for undertaking the assessment and thereby avoid replicating some elements of the work.”

Paragraph: 007 Reference ID: 56-007-20150327

3.7 PPG goes on to set out method of assessment;

“Housing for older people

The need to provide housing for older people is critical as people are living longer lives and the proportion of older people in the population is increasing. The National Planning Policy Framework glossary provides a definition of older people for planning purposes, which recognises their diverse range of needs. This ranges from active people who are approaching retirement to the very frail elderly. The health and lifestyles of older people will differ greatly, as will their housing needs. Strategic policy-making authorities will need to determine in relation to their plan period the needs of people who will be approaching or reaching retirement as well as older people now.

The age profile of the population can be drawn from Census data. Projection of population and households by age group can also be used. Strategic policy-making authorities will need 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. Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that are under occupied.

The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector. Evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards also provide useful evidence for plan-making authorities. The assessment can also set out the level of need for residential institutions (Use Class C2). Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Local authorities will therefore need to identify the role that general housing may play as part of their assessment.

Housing for people with disabilities

The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in ensuring that they live safe and independent lives. People with disabilities are defined in the National Planning Policy Framework glossary. However, authorities may wish to consider groups outside of the scope of this definition in order to meet the specific needs of their community.

There is no one source of information about disabled people who require adaptations in the home, either now or in the future. The Census provides information on the number of people with a long-term limiting illness and strategic policy-making authorities can access information from the Department for Work and Pensions on the numbers of Personal Independence Payment (replacing Disability Living Allowance) / Attendance Allowance benefit claimants. Whilst these data sources can provide a good indication of the number of disabled people, not all of the people included within these counts will require adaptations in the home. Applications for Disabled Facilities Grant will provide an indication of levels of expressed need, although this could underestimate total need. If necessary, plan-making authorities can engage with partners to better understand their housing requirements.”

Paragraph: 020 Reference ID: 2a-020-20180913

d) Equalities and Human Rights Commission Studies

- 3.8 The Equalities and Human Rights Commission has produced two important studies highlighting issues faced by disabled people in finding suitable housing to meet their needs. *The Housing Experiences of Disabled People in Britain* (May 2108) is a qualitative study of disabled people’s housing which highlights the significant improvement to quality of life which accessible and adaptable housing can bring for disabled people, but also how difficult it can be to find it. *Housing and Disabled People: Britain’s Hidden Crisis* (May 2018) evidenced the significant shortage of accessible homes across Britain.

4 Evidence

4.1 Nottingham City has a comprehensive approach to housing within its area, covering not just the provision of new homes through the planning system, but also including ensuring a mix and balanced supply of new housing to meet the needs of all of its citizens. The planning approach is supported by other actions including working with Registered Providers, licensing of private rented properties, direct provision through Nottingham City Homes (the City Council's ALMO), and delivery of market housing through its development partner, Blueprint. The Nottingham Housing Strategy 2018 to 2021, 'Quality Homes for All', June 2018 ([LAPP.NCC02](#)) sets out the City Council's approach to homes in all tenures.

4.2 This Strategy supports the introduction of Policy HO4, and states:

Page 32: "Nottingham is not expected to see a significant rise in the number of older people from the 'baby boomer' generation but it does have a disproportionate number of older people living with long term health problems and disabilities. We therefore need to ensure that we have a strategy in place to offer older people a range of housing options to enable them to live safely and independently for as long as possible."

Page 33: "...we will seek to deliver new homes which are accessible and meet the lifetime needs of their occupants and continue to deliver an adaptations service which assists our own tenants and private owners and renters via disabled facilities grants (DFGs)."

4.3 The Adult Social Care Strategy, 'Better Lives, Better Outcomes', was adopted in November 2017. It has themes around preventing people needing care, promoting independence, giving people choice and control, and maintaining support from within communities. This is within an overall vision of supporting independence and minimising the use of residential care. The delivery of homes which meet the lifetime needs of disabled people is clearly part of this. The strategy summary

(<https://www.nottinghamcity.gov.uk/media/1536258/approved-asc-strategy-summary-final.pdf>) states on page 7:

"A good home underpins independence and wellbeing. Adults with care and support needs should, where possible, live in their own home and only to move to residential care when all options are exhausted."

a) Demographic evidence

4.4 These strategies and Policy HO4 are supported by a range of demographic data which gives an indication of the likely future need for housing for older and disabled people.

4.5 Older People

- Nottingham currently has 37,800 people over 65¹. This is projected to rise to 45,600 (+21%) by 2028 and 55,680 (+47%) by 2041. Currently the over 65's make up 11.5% of the City's population, this is projected to grow to **13.2% by 2028** and 15.3% by 2041. Nationally the over 65's make up 17.9%, projected to increase to 20.9% by 2028 and 24.2% by 2041. ²
- Two of the age groups that are projected to see the biggest numeric increase from 2017 to 2028 (Local Plan end date) are 60-64 and 65-69, each growing by around 3,000 people. Longer term, to 2041, the age bands over 70 are projected to increase - by a total of 15,600. These age bands comprising the over 70's are also projected to have the greatest *percentage* increases long term. This growth is projected mainly in the later years and reflects increased life expectancy.

	2017	2028	Increase 2017-2028 No.	Increase 2017- 2028 %	% of total population 2017	% of total population 2028
65-69	11,200	13,900	2,700	24.1%	3.4%	4.0%
70-74	9,100	10,900	1,800	19.8%	2.8%	3.1%
75-79	6,700	8,600	1,900	28.4%	2.0%	2.5%
80-84	5,300	6,600	1,200	22.6%	1.6%	1.9%
85-89	3,400	3,500	100	2.9%	1.0%	1.0%
90 +	2,000	2,200	200	10.0%	0.6%	0.6%
65 +	37,700	45,600	7,900	21.0%	11.5%	13.2%
Total population - all ages	327,200	346,400	19,200	5.9%	100.0%	100.0%

- 12,500 (33%) over 65's report that their day to day activities are limited a lot by a **long term health problem or disability**, and a further 10,600 (28%) are limited a little. This compares to 7% and 8% of 16-64's.³
- Assuming the proportions of people living with long term health problems or disabilities remain roughly the same, there could be an additional **4,800** people (+21%) limited a lot or a little by 2028.

	2017	2028	Increase No.	Increase %
All over 65s	37,700	45,600	7,900	20.9%
Limited a lot	12,500	15,100	2,600	20.9%
Limited a little	10,600	12,900	2,200	20.9%

¹ Source: 2017 Mid Year Estimates, ONS

² Source: 2016 based population projections, ONS

³ Source: 2011 Census, ONS

- There are currently estimated to be around 7,000 people aged 65 and over **unable to manage at least one mobility activity on their own** (i.e. going out of doors and walking down the road; getting up and down stairs; getting around the house on the level; getting to the toilet; getting in and out of bed.). This could rise to 8,120 by 2028, an increase of 1,120 (+16%)⁴.

	2017	2028	Increase No.	Increase %
Total population aged 65 and over unable to manage at least one activity on their own	7,000	8,120	1,120	16.0%

- **Attendance Allowance** (AA) is a benefit for people over the age of 65 who are so severely disabled, physically or mentally, that they need a great deal of help with personal care or supervision. (i.e. attention in connection with their bodily functions and/or continual supervision to avoid substantial danger to themselves or others).
- At May 2018, 5,070 people over 65 were receiving Attendance Allowance, of which 2,920 were receiving the higher rate.⁵

4.6 Adults with disabilities

- Nottingham currently has 227,900 people aged 16-64. This is projected to rise to 235,600 (+3.4%) by 2028.⁶ (Note, the figures in the table below are 2017 projections from the 2016 population projections, and therefore differ from the 2017 mid year estimates)

	2017	2041	Increase 2017-2028 No.	Increase 2017-2028 %	% of total population 2017	% of total population 2028
16-64	227,900	235,600	7,700	3.4%	70%	68%
All ages	327,200	346,390	19,190	5.9%	100.0%	100.0%

- Around 14,830 people aged 18-64 are predicted to have a **moderate physical disability**, with a further 4,020 having a **serious physical disability**. This is projected to rise to 15,380 and 4,250 by 2028, a total increase of 790 (+4.2%).⁷

⁴ Source: www.poppi.org.uk. Figures are taken from Living in Britain Survey (2001) applied to the 2014 based population projections from ONS.

⁵ Source: Department for Work and Pensions via Statxplora

⁶ Source: 2016 based population projections, ONS

⁷ Source: www.pansi.org.uk Figures are taken from Health Survey for England (2001) applied to the 2014 based population projections from ONS.

	2017	2028	Increase No.	Increase %
18-64 predicted to have a moderate physical disability	14,830	15,380	550	3.7%
18-64 predicted to have a serious physical disability	4,020	4,250	240	5.9%
18-64 predicted to have a moderate OR serious physical disability	18,850	19,640	790	4.2%

- Around 49,200 people aged 16-64 (22.4%) are **core disabled or work limited disabled**, under the definition of the Equalities Act. This compares to 20.1% nationally.⁸
- In May 2018, 17,400 people were claiming a **sickness benefit**, equating to 7.7% of the population aged 16-64, compared with 5.5% for England. More than 75% of City claimants who have completed work capability assessments when transferring from Incapacity Benefit to Employment Support Allowance are placed in the 'support group' for people whose condition means they are not expected to return to work. This implies that more than 13,700 claimants in Nottingham will not be expected to return to work.⁹
- People with a long term health problem or disability can apply for benefits to help pay for additional care or personal mobility requirements. Prior to April 2013, people would apply for **Disability Living Allowance (DLA)**, but now people aged 16 to 64 have to apply for a **Personal Independence Payment (PIP)**.¹⁰
- In May 2018, 15,772 working age people were claiming either Disability Living Allowance or Personal Independence Payment. This is 6.9% of the age group.
- Currently, the 15,772 claimants comprise 5,000 people claiming DLA who are awaiting reassessment, 5,200 PIP claimants who previously claimed DLA and 5,550 new PIP claimants.
- People claiming the enhanced / higher mobility rate of DLA and PIP are the most likely to also require housing-related adaptations, or provision of specifically-designed accommodation to meet their housing needs. In May 2018 there were 2,130 working age people claiming higher level DLA in Nottingham and 5,000 claiming the enhanced mobility award of PIP. This represents 3.1% of the population. If we assume that this rate will continue, in

⁸ Source: Annual Population Survey, ONS

⁹ Source: Department for Work and Pensions via Nomis

¹⁰ Source: Department for Work and Pensions via Statxplorer

Nottingham there will be 7,305 enhanced / higher level claimants by 2028. This is likely to be an underestimate as the eligibility for PIP is wider than for DLA.

4.7 Health and disability by tenure

- Of the 13,900 people aged 16-64 who have a health condition or disability which limits their day to day activities **a lot**, 51% live in social rented accommodation – more than double the proportion of all 16-64's (24%).
- Of the 11,300 over 65's with a health condition or disability which limits their day to day activities **a lot**, 35% live in social rented accommodation, compared to 26% of all over 65's, while over 57% own their own home outright or with a mortgage or loan, compared to 67%.¹¹

		Population (2011 Census)	Owned outright	Owned with a mortgage or loan or shared ownership	Social rented	Private rented or living rent free
Total population	16-64	200,100	13%	32%	24%	31%
	65 and over	34,200	58%	9%	26%	7%
Day-to-day activities limited a lot	16-64	13,900	16%	19%	51%	14%
	65 and over	11,300	49%	9%	35%	8%

4.8 Deprivation

- In the **Index of Multiple Deprivation** results, Nottingham ranks 8th most deprived out of the 326 districts in England. This compares with 20th in the 2010 index and 13th in the 2007 index.¹²
- In the Lower Super Output Area level results, 61 of the 182 City Lower Super Output Areas (LSOAs) fall amongst the 10% most deprived in the country for the Index of Multiple Deprivation.
- Out of the seven separate 'domains' that make up the Index of Multiple Deprivation, **Health Deprivation and Disability domain** (measuring morbidity, disability and premature mortality) is the domain in which Nottingham performs worst. 63 LSOAs rank within the 10% most deprived in the country.

4.7 Whilst the statistics listed above cannot be used to determine a precise level of new housing need, since it cannot be determined accurately how many

¹¹ Source: 2011 Census, ONS

¹² Source: Indices of Deprivation 2015, Department for Communities and Local Government

people currently have adequate housing for their needs, they do nonetheless show clearly that Nottingham has a disproportionately high number of older people living with long term health problems and disabilities, and people of working age who are core disabled or work limited disabled, under the definition of the Equalities Act. The Disability Housing Needs study (below) shows that many of these people are currently in unsuitable accommodation. Policy HO4 will make a significant contribution to meeting the needs of these people.

b) Disabled Housing Needs Study (2012)

- 4.9 The Disabled Housing Needs Study was an independent study commissioned by Nottinghamshire and Derbyshire local authorities and undertaken by Ecorys and CIH Consult in 2012. Its aims were to assess the level of housing need among households with physical disabilities, developing a robust evidence base for the development of suitable housing and to better understand the possible routes to delivery. Although it pre-dates the more recent strategies, it nonetheless remains relevant as a specific piece of local independent evidence supporting Policy HO4.
- 4.10 The study used a combination of literature review, existing local and national data, (e.g. Projecting Older People Population Information System specialist datasets (POPPI) and Projecting Adult Needs and Service Information System (PANSI)) as well as focus groups and interviews with local residents, providers and experts.
- 4.11 Nottingham City's individual report makes the following observations and recommendations:
- That Nottingham's 65+ aged population would increase by 21% between 2010 and 2030, reaching 43,800 people and that this will impact on need levels.
 - That by 2015, up to 1,764 households containing a disabled person would be in unsuitable accommodation and require intervention to have suitable accommodation, rising to 2,147 by 2030.
 - That those surveyed or interviewed expressed a need or preference for ground level access properties and that key adaptations of existing properties focussed on level access bathrooms, through lifts and close access parking.
 - That the estimated shortfall of suitable accommodation by 2015 would be up to 1,198 properties and 421 wheelchair suitable properties by 2013.
 - That authorities should consider, amongst other recommendations:

- Implementation of planning policy around “Special Needs Housing” – including lifetime home and wheelchair accessible properties.
- Include the results of the research in the Housing Nottingham Plan and identify where delivery of suitable homes can contribute to broader community objectives and improved outcomes for disabled and young people.
- Ensure that developers’ obligations are enforced and take account of specific design requirements when assessing site viability.

4.12 Taking the projected shortfall in the second bullet above, assuming a constant rate between 2015 and 2030, there would be 2,096 households containing a disabled person who would be in unsuitable accommodation and require intervention to have suitable accommodation at 2028, the end date of the Local Plan. This is a clear justification for introducing a policy requirement for accessible and adaptable housing.

c) Current Needs and Recent Activity

4.13 Section (a) above shows that the Disabled Housing Study findings remain broadly sound, and this is supported by more up to date evidence detailed below:

- The current “Homelink” housing register (Nottingham City Council and local Registered Providers) contains 776 households where one or more member has a disability, with 163 applying from the private rented sector or a home they own. The housing register stood at 7,940 applicants at December 2018.
- 3,888 (approximately 15%) of Nottingham City Council’s tenant households have a disability. The Council’s current stock is 25,576 properties.
- In 2016/17, the Adaptations service received 1,038 referrals from public sector housing and completed 970 adaptations. In the same year, 327 referrals were received from the private sector with 227 completions
- From 2015-18, Nottingham City Homes (NCC’s Housing ALMO) piloted a Health to Housing scheme, designed to ease the demand on the Health Service and Adult Social Care by helping people at risk of hospital admission or unable to return home due to their property being unsuitable to move home.
- A total of 237 households were rehoused, including 161 preventative moves. The estimated saving to the Health Service was £2.1m

- Of those rehoused, 79% were over 55, 12% were “essential” wheelchair users and 63% cited mobility/accessibility as the primary reason for their requiring rehousing.

4.14 The first bullet point above gives a snap shot of the “Homelink” housing register, with a total of 776 households containing a disabled person. The level of adaptations required to existing properties is very high, with 1,197 adaptations being completed in a single year. This demonstrates a very high level of demand for adaptations to be made to properties to accommodate the needs of occupants. This demand spans both the private and public housing sectors

d) Nature and adaptability of the existing housing stock

4.13 Paragraphs 3.1 and 3.11 of the Sustainable, Inclusive and Mixed Communities Background Paper 2016 ([LAPP-HOU-01](#)) gives a comprehensive analysis of the make up of the City’s housing stock in terms of dwelling size. Its main conclusions are that the existing stock is unbalanced, with a high proportion of terraced housing and flats, and a low proportion of semi detached and detached homes. Paragraph 3.3 provides a summary and states:

“Just 15% of dwellings in the City are detached, compared to over 37% in the Nottingham Core Housing Market Area (excluding Nottingham) and 22% nationally. Conversely, the City has a much higher proportion of terraced housing (29% compared to 16% in the wider Housing Market Area) and twice the proportion of purpose built flats than the wider area (20% compared to 8%) (Source: 2011 Census). The difference in proportions of flats has been exacerbated by development in recent years, particularly in the City Centre. About 70% of all new dwellings built in the City between April 2002 and March 2012 were flats (including the conversion of existing buildings, but excluding purpose-built student flats).”

4.14 The large number of small dwellings, including terraced housing and particularly flats that may not be serviced by lifts, means that the nature of Nottingham’s existing stock is not one that lends itself to adaptation. Not only this, the Disabled Facilities Grant budget is limited and therefore must be used in the most effective way; on occasions adaptation will not be the most appropriate solution for either the resident or the Council. It is all the more important therefore that new housing is provided which suits the future needs of citizens.

e) Viability

- 4.15 The Nottingham City Council Whole Plan Viability Assessment ([LAPP.NCC16](#)) was undertaken on the basis of this requirement and concluded that “the majority of the housing development proposed by the Local Plan is viable and deliverable taking account of the cost impacts of the policies proposed by the plan and the requirements for viability assessment set out in the 2012 NPPF. The viability of both apartment development and brownfield housing in the lower value sub-market area is challenging under current market circumstances and some relaxation of Affordable Housing and infrastructure contributions may need to be considered at application stage for these forms of development to be delivered”.
- 4.16 More specifically the Assessment included an additional £20sqm construction cost allowance for Category 2 Adaptable/Accessible dwellings and the study therefore assessed the viability impact of this policy. This is set out in paragraph 4.29 of the Assessment.

5 Conclusion

5.1 The Ministerial Statement requires that optional new national technical standards can only be included in Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered. In the light of section 4 above, Nottingham City Council considers that Policy HO4 is fully supported by the evidence in terms of both local need and viability.

5.2 In summary the evidence presented to the Inspector shows that:

- Nottingham's elderly population is predicted to grow at a rate well in excess of the national average by 2028.
- Around 14,830 people aged 18-64 are predicted to have a moderate physical disability, with a further 4,020 having a serious physical disability. This is projected to rise to 15,380 and 4,250 by 2028, a total increase of 790 (+4.2%).
- The Disability Housing Needs study shows that many of these people are currently in unsuitable accommodation as there would be 2,096 households containing a disabled person who would be in unsuitable accommodation and require intervention to have suitable accommodation at 2028, the end date of the Local Plan.
- Nottingham's current housing stock comprises a large number of small dwellings, including terraced housing and particularly flats which may not be serviced by lifts, meaning that the nature of Nottingham's existing stock is not one that lends itself to adaptation.
- Adaptation is not always the most appropriate or cost effective solution.
- It is critical that new housing is provided which suits the future needs of citizens and the City Council believes there is a clear justification for introducing a policy requirement for accessible and adaptable housing.

5.3 Should the Inspector accept that sufficient evidence exists to support Policy HO4, then it is suggested that changes to the Justification are made to make this clear.

5.4 The inclusion of the following text to para 4.35 of the LAPP is suggested as an additional change:

".....in the community. This includes older people and people with disabilities. Government policy allows Local Plans to seek the provision of Accessible and Adaptable Dwellings (Category 2) where they address a clearly evidenced need, and where their impact on viability has been considered. National and local statistics and the Disabled Housing Needs Study (2012) indicate that Nottingham has a disproportionately high number of older people living with long term health problems and disabilities, and people of working age who are core disabled or work limited disabled, under the definition of the Equalities Act, and many of these people are in unsuitable accommodation. The

number of older people and people with disabilities is projected to increase significantly over the plan period, and the preponderance of small houses and flats in Nottingham's existing housing stock means that many existing properties are difficult to adapt. The impact on viability of this policy on residential development has been considered through the Nottingham City Council Whole Plan Viability Assessment (August 2018) and found to be acceptable."