

**INSIGHT**  
**APR 2019**

# Solutions to an age old problem

Planning for an ageing population



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# Executive summary

**Our ageing population is growing. This has wide ranging policy and practical implications and we must ensure that the associated housing needs are met. Yet only around 10% of Local Plans in England, Wales and Scotland have a specific policy to address older people's housing needs.<sup>1</sup> The House of Commons has called for a national strategy to bring together and improve policy on housing for older people.<sup>2</sup>**

National planning policy<sup>3</sup> sets out that we need to meet the housing needs of the population, including older people, but this is clearly not being addressed through Development Plans. Instead, planning policy is heavily tilted towards getting people onto the housing ladder. Local Plans are crucial in ensuring that the housing needs of older people are met, yet the current position is inadequate.

There are a variety of types of accommodation that meet the housing needs of the older population, including elements of care where appropriate. However, there are no widely accepted definitions and even less agreement in regard to what Use Class the different types of accommodation should fall within.

Currently, national and local planning policy is deficient in addressing the implications of the growing older population. This research explores the different types of housing for older people, highlighting inconsistencies in how they are considered within the planning system and the implications of this.

Case studies from the seven local planning authorities (LPAs) across England, Scotland and Wales with the highest absolute and relative numbers of older people, and particularly where there are high dependency ratios, clearly demonstrate that whilst there is a broad recognition of the need to provide a range of housing choices for older people, this rarely translates through to meaningful policies or allocations.

This research provides recommendations on how the planning system can help to facilitate the delivery of housing for older people which should be acted upon to ensure that the 'ticking time bomb' scenario that is so often referenced is not realised.

<sup>1</sup> Lichfields research

<sup>2</sup> House of Commons Communities and Local Government Committee Housing for Older People Second Report of Session 2017-2019 (5 February 2018)

<sup>3</sup> National Planning Policy Framework (2019) Paragraph 59



# Key figures

60%

of Development Plans in England, Scotland and Wales<sup>4</sup> have generic policies relating to a requirement for housing for older people

14%

of Development Plans in England, Scotland and Wales have specific policies relating to a requirement for housing for older people

7%

of Development Plans in England, Scotland and Wales include land allocations for housing for older people

81%

of Scottish authorities monitor delivery of homes for older people compared with 16% in England and Wales

5.2m

the number of additional people aged over 65 by 2036 (from 2016) in Great Britain

17m

the number of people aged over 65 in Great Britain by 2036

24%

of the population will be aged over 65 in Great Britain by 2036

<sup>4</sup> Post NPPF adopted plans in England, all adopted Local Development Plans (LDPs) in Wales and Scotland

# O1 Introduction

The House of Commons has called for a national strategy<sup>5</sup> which brings together and improves the policy on housing for older people to facilitate the delivery of a suitable type and amount of new homes. Evidence provided to the House of Commons identifies a shortage of desirable mainstream accessible and specialist housing in both the private and social sectors.

In line with the wider global trend, the UK population profile is ageing dramatically. Inevitably the implications of this are wide ranging as the country's demographic profile is the foundation upon which public finances are designed and major policy decisions are made. The planning system will therefore continue to play a crucial role in facilitating the delivery of the homes and facilities required to meet the needs of this growing demographic.

If sufficient new accommodation isn't provided to meet the needs and demands of this group there could be a greater burden on the NHS and local authority services (despite them having their own supply and funding issues) and more older people remaining in their current homes. Whilst clearly many older people choose to remain in their home, insufficient supply could lead to many more remaining against their desires or despite the property being unsuitable for their needs.<sup>6</sup> This would impact on the supply of houses suitable for younger households.



This report explores the topic of how the planning system currently addresses the delivery of accommodation for older people through a review of Development Plan policies and allocations and draws on case studies from across the UK. It makes recommendations to inform the national strategy so that the planning system is well placed to support the correct amount and type of accommodation.

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<sup>5</sup> Relating to England

<sup>6</sup> Government Office for Science Future of an ageing population report (2016) suggested that 58% of people over 60 were interested in moving but cannot find suitable properties (page 54)

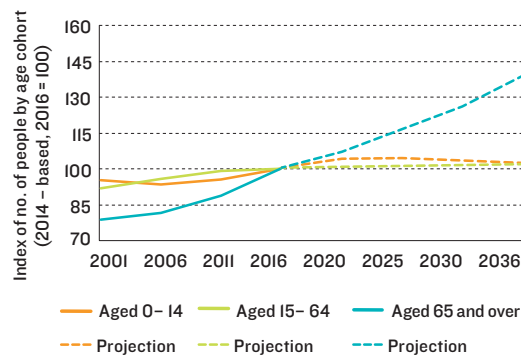
# 02 Context

33%

of all people aged 65 are expected to live in coastal localities by 2036

In Great Britain, the number of people aged 65 and over is projected to increase faster than any other age cohort as shown in Figure 1.

Figure 1: Index of people by age cohort (England: 2016-based, Scotland & Wales: 2014-based)



Source: ONS, National Records of Scotland, Welsh Government, Lichfields analysis

Whilst improvements to healthcare have led to remarkable improvements to life expectancy, with this major demographic change comes economic and social challenges including a change in housing needs. Importantly, older people generally live in smaller households (single or couples) so the housing implications of the population increase will be disproportionately significant.

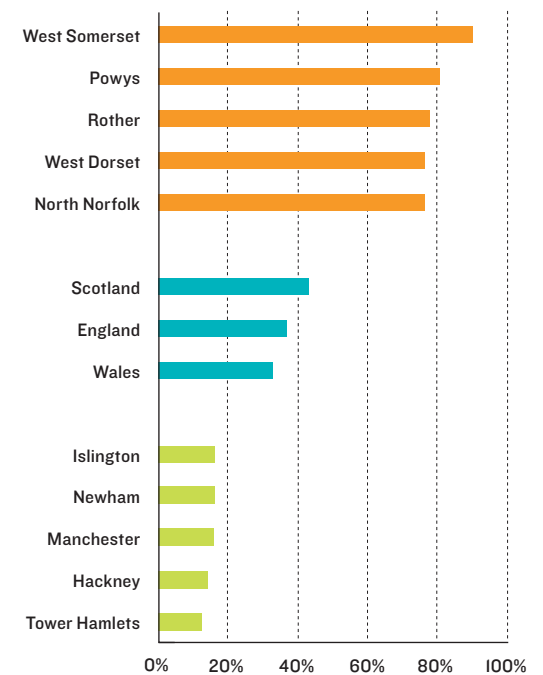
Within the UK, the degree to which each local authority will be affected by the demographic shift varies significantly. This can be shown by looking at the old-age dependency ratios – a measure of the number of people aged over 65 for every person aged between 15 and 64.

As Figure 3 shows, coastal locations are expected to have higher old-age dependency ratios than urban areas. However the largest absolute increase in the number of older people will take place in urban areas. On average, by 2036, coastal locations are expected to have an old-age dependency ratio of 53% (i.e. 53 people aged over 65 for every 100 people aged 15-64) compared with 38% in urban areas.

Overall, just under one third of all people aged over 65 (5.1 million) are expected to live in coastal localities by 2036, with around 40% in rural areas and 60% in urban areas. Cities' old-age dependency ratio will remain lower relatively speaking thanks to the net inflow of younger people. This is not experienced to the same degree in coastal locations.

By 2036, there will be over four people aged over 65 for every 10 people between 15 and 64 in Great Britain as a whole. Local figures will range between just over one in 10 in Tower Hamlets to over eight in 10 in West Somerset, as shown in Figure 2.

Figure 2: Top and bottom five LPAs by old-age dependency ratio

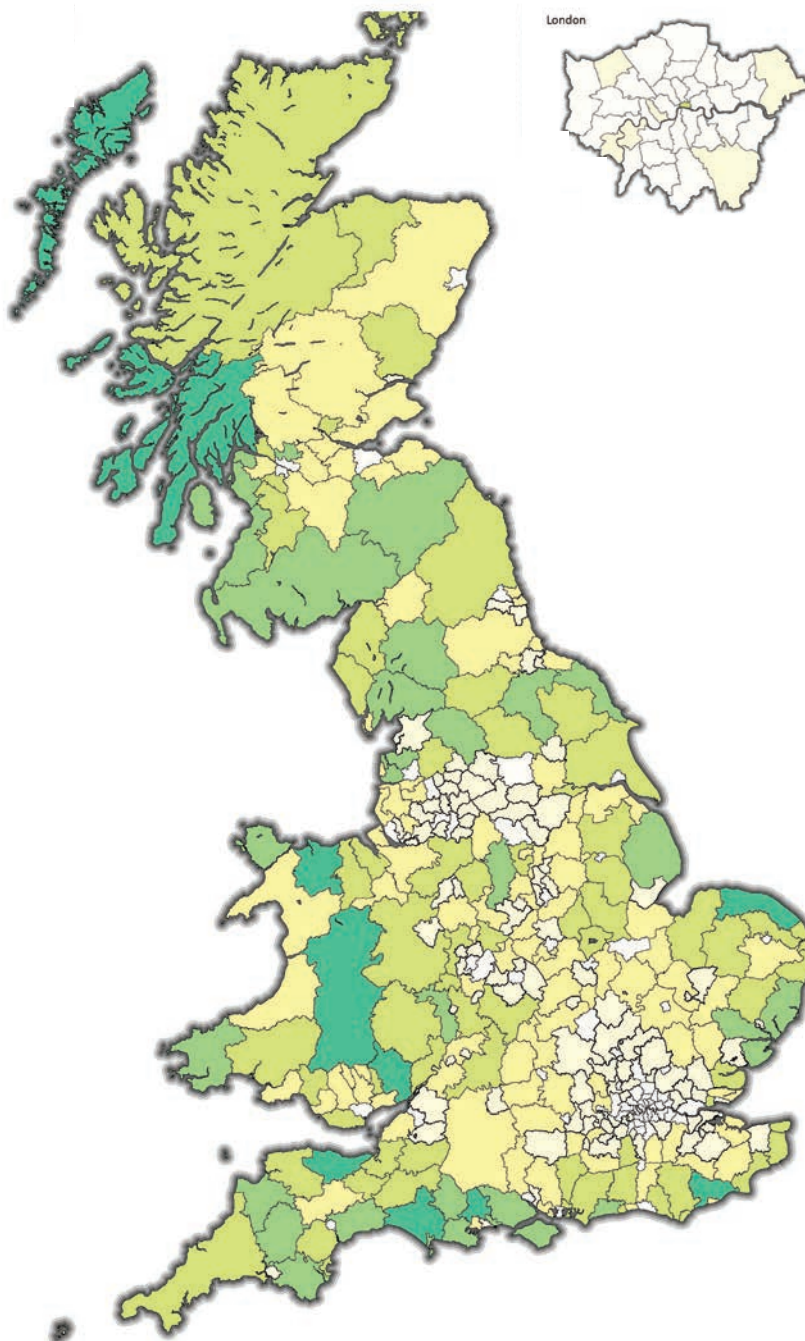
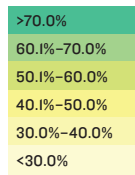


Source: ONS, National Records of Scotland, Welsh Government, Lichfields analysis

Whilst the extent of the problem nationally is clear, local authorities in some areas will have to address some fairly extreme situations.

Figure 3: Forecasted dependency ratios by local authority by 2036

Dependency  
ratio, 2036:



Source: Lichfields analysis

## BY 2036

there will be almost  
four people aged over  
65 for every 10 people  
between 15 and 64

## Types of housing for older people

As people live longer and health care improves, the types of accommodation needed by the older population varies. Key factors include general health, levels of dependency, finances of individual households, as well as the condition of the current accommodation and the extent to which it can be adapted to meet specific needs.

The Elderly Accommodation Counsel National Housing Database (2014) includes the following types of accommodation:



**Sheltered Housing** – where a manager (warden) service is provided on site on a regular basis but where no registered personal care is provided



**Enhanced Sheltered Housing** – where service provision is higher than for sheltered housing but below extra care level



**Extra Care** – where care (registered personal care) is available on site 24/7



**Residential Care** – care homes registered with the Care Quality Commission to provide residential (personal) care only. All beds are allocated to residential care



**Nursing Care** – where a care home is registered with the Care Quality Commission to provide nursing care. All beds are allocated to nursing care

However, within the planning arena there is no fixed or agreed definition of what constitutes different types of housing for older people. In England and Wales, the only subtlety lies in whether a development sits within Use Class C3 (Residential) or C2 (Residential Intuitions) and in Scotland Class 8 or Class 9.

Appeal decisions in England show how Inspectors have wrestled with the issue. For example, in one appeal for *retirement apartments* for over 55s,<sup>7</sup> the Inspector considered the use

class to be C3 because they were wholly self contained and noted that, whilst they were serviced, this is different from care.

In a separate case,<sup>8</sup> the Inspector considered that *assisted living* units were C2 because, whilst they were self contained, they were accessed via communal spaces and residents had access to communal facilities. Occupants had to be over 60 and receive a minimum of two hours care per week, albeit the definition of care was very broad.

In two cases relating to *extra care* provision, both Inspectors concluded these were C2 uses. In the first instance<sup>9</sup> this was because residents were provided with a care package and in the second case<sup>10</sup> because, whilst the units were self contained, they did not represent independent living.

In England and Wales the categorisation of the accommodation as falling in Use Class C2 or C3 has financial implications in regard to policy requirements and obligations such as CIL charges and affordable housing requirements. C3 uses typically have to make contributions whilst C2 do not. Key issues in determining the appropriate Use Class include the levels of care provided and the amount of shared facilities.

In addition in England it is notable that the ability for local authorities to require the Lifetime Homes standard<sup>11</sup> has been withdrawn following a Ministerial Statement in 2015,<sup>12</sup> and the Government is now stipulating that developments need only comply with Part M4(1) of the Building Regulations, or more stringent Nationally Described Space and Access Standards where there is an evidenced local need to do so.<sup>13</sup>

This seems to be a backwards step. Whilst the change was intended to improve viability for housebuilders, it will also increase the pressure on the availability of accommodation which is specifically designed to meet the needs of older people.

<sup>7</sup> APP/R0335/W/15/312881207 (March 2016)

<sup>8</sup> APP/M2270/W/16/3161379 (14 June 2017)

<sup>9</sup> APP/L3815/W/17/3180078 (16 March 2018)

<sup>10</sup> APP/J0405/W/17/3181140 (5 April 2018)

<sup>11</sup> <https://www.gov.uk/government/speeches/planning-update-march-2015>

<sup>12</sup> <https://www.gov.uk/guidance/housing-optional-technical-standards>

<sup>13</sup> <https://www.gov.uk/guidance/housing-optional-technical-standards>



# 03 Current planning policy

## National

### England

#### National Planning Policy Framework

The revised National Planning Policy Framework (NPPF) (published February 2019) states that planning policies should reflect the size, type and tenure of housing needed by different groups, including older people .

The NPPF 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.”* (Lichfields emphasis).

#### Planning Practice Guidance

The Planning Practice Guidance (PPG) states that the need to provide housing for older people is “critical” . It emphasises that strategic policy makers should consider both how to support older people to live independently and safely in their own homes and should support the provision of specialist accommodation, e.g. sheltered, extra care and registered care.

#### Housing Delivery Test

The revised NPPF introduced the new Housing Delivery Test (HDT), an annual measurement of housing delivery, against which local planning authorities are judged, and sanctions applied, in order to boost supply . The first HDT results were published in February 2019. The HDT Measurement Rule Book states at paragraph 11 that the delivery of bedspaces in communal establishments, e.g. residential care homes, will be counted towards this test on a pro rata basis . This means that delivery of all types of specialist accommodation for older people will contribute towards local authorities' housing supply and can help them meet the HDT.

#### Housing for Older People Inquiry

In its response to the Housing, Communities and Local Government Select Committee inquiry into Housing for Older People (2017-19), the Government emphasised its commitment to:

*“do more to ensure that more homes suitable for older people are being built”*. It also recognised the need to provide a better choice of accommodation for older people to:

*“enable them to live independently for longer, improve their quality of life and free up more family homes for other buyers”*.

### Wales

In Wales, national planning policy is set out in the Welsh Government's Planning Policy Wales (PPW) (Edition 10, 2018). PPW emphasises the importance of developing and maintaining places that *“support healthy, active lifestyles”* across all age groups (paragraph 3.2.2). In respect of housing, it requires local planning authorities to:

*“plan for a mix of market and affordable housing types to meet the requirement and specifically consider the differing needs of their communities; this should include the housing requirements of older people...”* (paragraph 4.2.5).

It goes on to require planning authorities to promote *“barrier free housing”*, such as those built to Lifetime Homes standards *“to enable people to live independently and safely in their own homes for longer”* (paragraph 4.2.11).

## Scotland

National planning policy in Scotland is currently set out by the National Planning Framework (NPF), the spatial expression of the Scottish Government's Economic Strategy, and by Scottish Planning Policy (SPP).

SPP requires LPAs to:

*"consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation, including care homes and sheltered housing... supporting independent living for elderly people and those with a disability."* (Paragraph 132).

The Scottish Government is presently undertaking a review of the planning system, which is currently working its way through the legislative system. At the time of writing, it is unclear precisely when the Bill will pass through parliament or what aspects will be carried through to its final iteration. As presently worded, following its second stage reading in parliament, the Bill proposes significant restructuring of the development plan hierarchy. This would elevate the NPF (which would incorporate SPP) to development plan status. It would also introduce requirements for LDPs to include *"targets for how, through the exercise of their functions, the planning authority will ensure the building of new housing to meet the needs of older people and disabled people"*.

## Local

### Local Plan Analysis

Lichfields has undertaken a review of all post-NPPF adopted plans in England, and all adopted Local Development Plans (LDPs) in Wales and Scotland. This review (summarised in Figure 4) identifies that very few local authorities are currently actively addressing the increasing housing need of the growing older population.

Across England, Wales and Scotland, only 16 out of the 149 plans reviewed have identified a specific requirement for older people's housing and only six have specifically allocated land for this express purpose.

## Strategic Housing Market Assessments

Our review also looks at a sample of Strategic Housing Market Assessments (SHMAs) in England published between 2010 and 2017. Our research and experience shows that the majority of SHMAs recognise, to varying degrees, the general need for specialist older people's accommodation or adapted dwellings within their respective housing market areas.

The needs for older people's accommodation are often articulated most strongly in SHMAs through the results of household surveys and stakeholder consultations. However, some SHMAs also use demographic and statistical analysis to provide a more accurate and robust assessment of need.

For example, the Leeds SHMA (2017) uses the Housing Learning and Improvement Network (LIN) Strategic Housing for Older People 'SHOP'<sup>14</sup> tool to estimate current and future needs for specialist older person's housing from 2014 through to 2030. The results of the SHOP data for Leeds showed that against the 2014 prevalence rates there are shortfalls in provision across all types of accommodation for older people with the exception of extra care.

Where we have found SHMAs to be lacking is in the translation of need into the overall objectively assessed housing need (OAHN) figure (if appropriate), and ultimately a specific requirement for C2 or adapted/specialist C3 dwellings, in addition to the OAHN.

As an example, the Kirklees SHMA (2016) states that by 2030 there is a need for an additional 388 units of housing with care for rent, 628 units for sale or shared ownership and an additional 291 units of provision for older people with dementia. It also adds that the range of housing options available to older people needs to be diversified, for instance through the development of open market housing designed for older people and the development of sheltered accommodation, extra care housing and co-housing for rent or sale. However, there is no specific reference to this need in the final OAHN calculation.

<sup>14</sup> <https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/ExtraCareStrategy/SHOP/>

Whilst Local Plan Policy PLP11 encourages new developments to include dwellings which can be adapted to meet the needs of people into later life, no specific allocations to meet these needs are provided in the Plan.

The Government indicated that it was aware of potential difficulties in identifying housing needs for specific groups such as older people in housing needs assessments in the 'Planning for the right homes in the right places' consultation (Question 10a). In its response to the consultation, MHCLG has advised that it intends to build on existing guidance that sets out how the needs for different types of housing should be addressed and add further information where this would assist with the identification process. Whilst an acknowledgement of the need to improve existing guidance was positive, the revised NPPF and PPG provided the ideal opportunity to do so, but has been missed. No such guidance has been provided in the revised NPPF or in revisions to the PPG.

## **Monitoring Supply**

Lichfields has undertaken a review of the current supply of accommodation for older people and whether LPAs are actively monitoring its delivery. The results show that very few LPAs (16%) within England and Wales monitor the delivery of such accommodation. Out of those that are monitoring the delivery, many have only begun to do so in recent years with a small number providing data for a longer number of consecutive years since the adoption of their Development Plan.

By contrast, the majority (81%) of local authorities in Scotland are currently monitoring the supply of accommodation for older people, with the results published on the Scottish Government's website. The data shows the number of dwellings each year since the start of the relevant Local Development Plan period which includes sheltered, very sheltered, medium dependency accommodation as well as dwellings which have been wheelchair adapted.

The amount delivered differs between each LPA, however, the majority show that delivery has been steady since the start of the plan period. Whilst it is positive that monitoring is happening in Scotland, if this is not related to a clear policy on requirement or land allocations the impact will be limited.

An analysis of the data has found no clear patterns between local policy and the delivery of accommodation for older people. Those authorities that have identified a specific requirement within their adopted plans are not necessarily those that currently monitor the supply of housing. Nor is there any correlation between those authorities that are actively addressing the older people's housing need or monitoring the delivery of housing for older people and the authorities that have been found to have the largest populations of older people.

The position is very mixed but overall it is clear that the vast majority of local authorities do not have up to date strategies, policies, allocations or monitoring to ensure the delivery of a suitable amount and type of accommodation through the planning process for their older population.

Whilst to date, many LPAs are yet to address older people's housing need within local planning policy, many are taking a step in the right direction and have acknowledged that a greater focus is needed to tackle the implications of an ageing population.

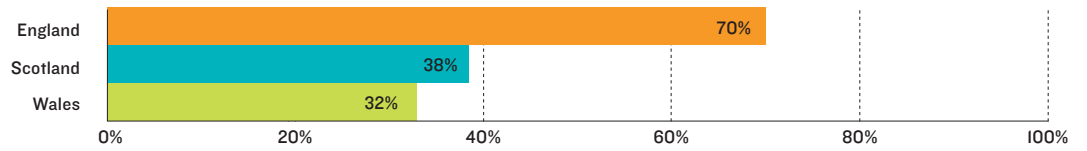
During the review, it became apparent that many LPAs have acknowledged that monitoring of the supply of older people's housing is needed in the future. However, there is a crucial gap when it comes to the translation of evidence into policy. Whilst it is positive that the issues are being considered in evidence, this will ultimately have no real impact until it is incorporated into planning policy.

**7%**

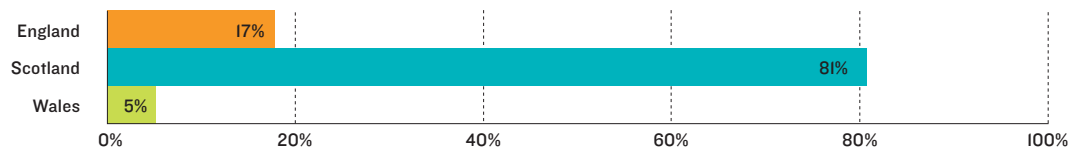
of local plans in England, Scotland and Wales include allocations for housing for older people

Figure 4: Analysis of local plans

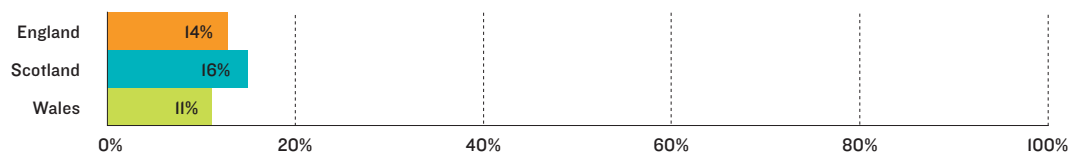
% of Development Plans that include a generic policy relating to the housing needs of older people



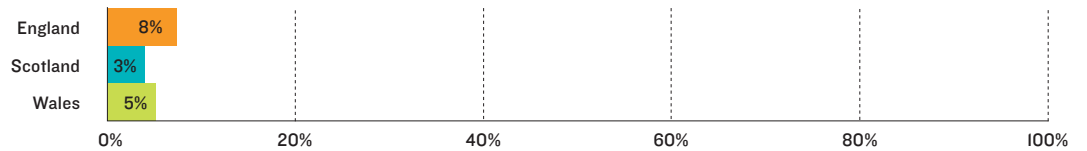
% of local authorities that monitor the delivery of housing for older people



% of Development Plans that include a specific requirement for housing for older people



% of Development Plans that include allocations for housing for older people



Source: Lichfields analysis

# 04 Case studies

Lichfields has analysed seven LPAs across England, Scotland and Wales with high absolute and relative numbers of older people, particularly where there are high dependency ratios. The research summarises how these LPAs are planning to meet the housing needs of their older residents and lessons learned to provide recommendations to inform a national strategy.

From the research below and from Lichfields' experience, we have not found any LPAs that have a comprehensive positive planning strategy to proactively identify and meet the housing needs of its older population, allocating sites to meet this need and monitoring delivery. However, we would welcome discussions with any LPA who does do this to feed into this ongoing area of research.

LPA	Context		Supportive policy	Allocation	Monitoring	Other comments
	% of people aged over 65	Old-age dependency ratio (2036)				
West Somerset Council	43.7%	89.7%	✗	✗	✗	Council's policy team suggests encouraging people to down size and attracting developers are key challenges.
Derbyshire Dales District Council	35.8%	64.5%	✓	✗	✗	Council has enabled a bungalow programme with most affordable housing schemes having two or more bungalows built to the adopted standard in Building Regulations, delivered predominantly through SIO6 agreements.
Scottish Borders Council	34.8%	68.7%	✓	✗	✓	Positive policy but not proactive in requiring allocations.
Ryedale District Council	33.8%	59.8%	✓	✗	✓	Implementation of policy through CIL, developer contributions and allocations but no site allocations for older people's housing provision in the draft Ryedale Plan Sites Document.  Large retirement schemes that significantly exceed the identified need will be resisted to prevent the in-migration of older people.
Isle of Anglesey County Council	32.5%	64.1%	✗	✗	✗	Three new Extra Care Schemes delivered due to a £26m Extra Care Housing boost in North Wales from the Social Housing Grant Programme and the Welsh Government.  Affordable housing contribution relief is afforded to C2 development.
South Oxfordshire District Council	28.1%	45.9%	✗	✗	✓	Extra care, independent living, care homes and residential institutions pay £0 in CIL recognising the need to support such developments.
London Borough of Bromley Council	17.2%	30.5%	✓	✗	✗	No affordable housing relief provided for older people's accommodation.

# 05 Findings and recommendations



It is a well-known fact that our society is ageing... while this is something to be celebrated, it also presents challenges as people's housing needs and preferences change as they grow older...  
**House of Commons, Housing for older people Second Report (5 February 2018, para 4)**

It is well documented that **we have an ageing population** and the implications of this are wide ranging. A **clear plan is needed** to ensure the housing needs of this demographic are adequately met. National and local planning policy is not currently doing this.

At national level, planning policy should **require LPAs to objectively assess the housing needs of its older population**. It should **recognise the roles of different types of accommodation** and ensure that policy is fit to enable delivery, mindful of the differing considerations that can help or hinder delivery in terms of financial implications, land requirements, business models and design requirements. The need for such accommodation should be additional to the OAHN.

Linked to this, is a need to ensure **standard definitions** are more widely used which will help to provide more certainty at a local level as to what Use Class a development falls within, recognising the difference between housing with care and general retirement housing.

At a local level, whilst a number of LPAs recognise the need to meet the needs of the ageing population, and some identify a more specific requirement for such provision, this often fails to translate into any meaningful policy that proactively supports delivery which is actively monitored. **Development Plans at a local level should identify specific requirements based on a robust evidence base, ensure they have a positive policy context in place, identify and allocate sites and monitor delivery.** In the same way that action should be taken if standard housing delivery fails to meet the identified need, action must be taken if delivery of older people's housing fails to meet need. This should not be at the expense of general needs housing.

Similar to the **'carrot and stick'** approach that exists in national policy to ensure that general housing needs are met, within any new national strategy for the delivery of housing for the older population, a comparable approach is needed to ensure the delivery of housing to meet the needs of our population's biggest and fastest growing age cohort.

Whilst it is time to plan at national and local level, it is equally important that **all sectors within the industry engage in the planning process** to positively shape a new policy landscape. This is in order to **assess the need; identify appropriate sites; understand financial implications; monitor delivery to ensure appropriate action can be taken if delivery is not forthcoming;** and, **work cross sector to better understand the economic and social benefits of doing so.**

## Recommendations

1. The Government should publish a national strategy providing detail on how the housing needs of older people will be met.
2. Expedite the new statutory duty on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older people, requiring LPAs to include positive policies and allocations for housing for older people and monitor its delivery. Parallel guidance should be issued by Scottish Government and Welsh Government.
3. Clarity should be provided in PPG, PPW and SPP regarding standard definitions of older people's housing and what Use Classes they fall within, including whether a new Use Class is required.
4. National guidance should be produced on how older people's housing is considered within CIL Charging Schedules and other obligations such as affordable housing.
5. Clear guidance must be published on how housing for older people is considered when calculating the objective assessment of housing need. We recommend that it is made clear that this requirement is in addition to meeting other needs.
6. Adopt an older people's Housing Delivery Test whereby failure will result in, for example, an LPA entering special measures or facing Government intervention to ensure that adequate delivery is achieved.

# The Lichfields perspective

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Securing the right mix in residential development proposals

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