

## **Calderdale Local Plan Examination**

### **STAGE 2 - HEARINGS**

#### **Matter 10 Other Housing Needs**

#### **Evidence for the need for new homes built to M4(3) Wheelchair accessible standard**

#### **January 2020**

- 1.1 The Council states in its Matter 10 Hearing Statement (HS10.1a) that, on the basis of available evidence, the Council does not consider it has the evidence to justify a policy requiring new development to incorporate a percentage of wheelchair accessible homes within the Local Plan. This is based on attempts to assess the need for wheelchair homes as contained within its statement:
  - a) Estimated number of wheelchair user households with unmet need 2017: 313 households (0.6% of the total number of households) (using the methodology set out in the Chapter 5 of the Habinteg publication "Mind the Step").
  - b) Number of households on the Keychoice housing register (for those seeking homes from Registered Providers) needing to move on medical or welfare grounds, including grounds relating to a disability: 764 (0.8% of households)
  - c) The CORE (Continuous Recordings) data for 2018/19 on social housing statistics show that of a total of 1317 Private Register Provider lettings, 12% of people moved due to ill health or a disability, and 7% required level access. This represents 0.2% and 0.09% respectively of the total number of households in Calderdale.
- 1.2 The Council does not consider the above evidence justifies the inclusion of a policy in the Local Plan to require a proportion of new homes to be built to M4(3) Standard. The reasons for this are:
  - a) The estimated number of wheelchair uses in housing need in 1.1a above uses data from the 2007/08 Survey of English Housing for the 'Number of wheelchair user households in the Yorkshire and Humberside Region' and 'The Number of those Households in Housing Need in the Yorkshire and Humberside Region' to give a percentage which is applied to the total number of households in the Borough. The data used is therefore out of date and the figures for the region may not reflect those for Calderdale.
  - b) The data from Keychoice provides a snapshot at a single moment in time and may not reflect future need. Not all of those needing to move on

medical or welfare grounds will need M4(3) homes. It also excludes those seeking homes in the private sector.

- c) The CORE data is perhaps more representative particularly the percentage looking for level access. However it only reflects the need for those seeking homes in the social housing sector and omits a potential market for private homes.

Overall, the number of wheelchair homes required as a proportion of the overall households in Calderdale is very small and may be open to considerable error.

## **2. Local Plan Stage 2 Hearings**

- 2.1 At the Stage 2 Hearings, the Hebden Bridge Disability Action Forum reiterated its strong support for the Council's case for all new homes to be built to the M4(2) standard.
- 2.2 However, they further urged the Inspector to require an addition to Policy HS4 requiring 10% of new homes be built to M4(3) standard, i.e. suitable for wheelchair users. Their evidence for this (as set in their Hearing Statement HS10.6), and our response is set out below:

- a) The English Housing Survey 2014 to 2015: Adaptations and Accessibility of Homes Report shows that 4% of households in England include at least one wheelchair user. Based on this proportion the Forum concludes an additional 3686 homes are needed for wheelchair users (presumably to M4(3) standard) to meet existing needs (4% of the estimated number of households in Calderdale in 2018).

*CMBC response: The requirement of 3686 for M4(3) homes in the Forum's evidence would only meet existing need. To this could be added the expected increase in the number of households to the end of the plan period; giving a total need of 4199 M4(3) homes.*

*However, this figure is based on very limited information from the English Housing Survey The proportion of households that are wheelchair users include those who use wheelchairs outdoors only and whose needs may be met by adaptable M4(2) housing which provides additional storage space for wheelchairs and potential for adding features such as stair lifts. The survey does not record the proportion of these households which require full M4(3) accommodation, the proportion that wish to move from their present accommodation (even if it is inadequate), or those whose needs could be met by the M4(2) standard and adaptations<sup>1</sup>.*

---

<sup>1</sup> Its main test of accessibility is whether a home is "visitability" a standard which falls far short of M4(3). Among all households with a wheelchair user, 84% (685,000) lived in a home that did not have full visitability including the 19% (158,000) who lived in a home that lacked any of the four features. Full visitability is defined by four features being present; level access, flush threshold to main doorway, circulation space to Part M, WC at entrance level

*Conversely it does not take account of likely rising numbers of wheelchair users in an aging population. The Council considers that the absence of this information makes the Survey an inadequate basis for determining the number of M4(3) homes needed.*

- b) The Forum takes the NHS estimate of the number of wheelchair users in the UK and applies this as a proportion of the total population of Calderdale to give an estimated number of 3771 wheelchair users in Calderdale. The Forum confirms this figure using the number of wheelchairs provided by the NHS to people in Calderdale through Rosscare (3029) and suggests that wheelchairs sourced privately would take this figure to around 3771.

*CMBC Response: The figure for a total population does not reflect housing need since there may be multiple users in the same household. Moreover, the NHS estimate indicates that 33% of wheelchair users are not regular users who may not require M4(3) homes. Equally it does not indicate the proportion of wheelchair users who wish to move to an M4(3) home.*

*In its evidence the Forum refers to a later publication by Habinteg: Housing and Disabled People; 'Planning for Accessible Homes: Toolkit for Local Authorities in England.' While this provides a useful introduction to M4(2) and M4(3) housing it does not attempt to update the methodology for calculating the need for wheelchair housing. Instead it sets out a check list suggested sources for data on disabled housing.*

### **3. Further Evidence Considered by the Council**

- 3.1 Following the comments from the Hebden Bridge Disability Forum at the Stage 2 Hearings, the Inspector asked the Council to consider the evidence in the data sources cited by the Forum to determine whether evidence would support a policy requirement in the Local Plan for M4(3) dwellings.
- 3.2 The Habinteg report mentioned above sets out a number of data sources to assist in planning for accessible and adaptable homes. A number of these are already presented in Appendix 2 of the Housing Technical Paper (CC40), however, others are discussed below.
- 3.2 Statistics on **Blue Badge holders** is available from gov.uk. The latest available data (March 2019) shows that in Calderdale, 4107 individuals are entitled to a Blue Badge. 4634 individuals hold a Blue Badge but were subject to further assessment to ascertain qualification. Both categories could include wheelchair users, but the statistics do not identify the number of Blue Badge holders that are wheelchair users.
- 3.3 Data on claimants of **Disability Living Allowance (DLA)** is available through the gov.uk website. The data shows that in Calderdale in November 2018, there were 5300 individuals with 'any disabling condition' in receipt

of DLA. The data does not provide any information on the number of DLA claimants who are also wheelchair users. DLA is being gradually replaced by Personal Independent Payment (see below).

- 3.4 Data on claimants of **Personal Independent Payment (PIP)** is also available on the gov.uk website. In July 2020, there were a total of 8954 claimants of PIP in Calderdale. Of these 4022 were in receipt of the Enhanced Mobility Award, 4571 were in receipt of the Standard Mobility Award and 358 were not in receipt of any mobility reward. Although this data gives information on the number of recipients of the Enhanced Mobility Award, it unfortunately does not state how many of these are also wheelchair users.
- 3.5 Data on **Attendance Allowance (AA)** is also available from gov.uk. Attendance Allowance is payable to 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. In February 2020, there were 3998 cases in payment of AA. As with PIP and DLA, the data does not provide a breakdown in terms of the level of AA claimants who are also wheelchair users.
- 3.6 A recent enquiry (October 2020) made to Together Housing Group regarding the number of applicants on **Keychoice** requiring wheelchair accessible homes, has shown that out of 7837 live applications, there are 183 applications where at least one names applicant is a wheelchair user. This equates to 2% of live applications.

#### **4. Calderdale Council's preferred approach**

- 4.1 Implementation of Policy HS4 would provide higher quality housing for all users and being more easily adapted to the needs of a wider range of people. The Council consider it has presented the evidence which justifies the policy requirements of Policy HS4 with regards to the provision of M4(2) homes.
- 4.2 Paragraph i of Policy HS4 sets out that the Council will seek to increase the level of housing suitable to meet the needs of older people and disabled people. In order to meet more specific needs, the Council expects to continue to match individual households with specific and complex needs with housing providers building new dwellings.
- 4.3 With regards to the provision of M4(3) homes and setting a requirement in Local Plan policy, the Council does not consider that there is robust evidence which supports the inclusion of a requirement figure in the Local Plan. From a further review of evidence, it appears to be the case that there is no one source of data which sets out the current level of wheelchair users in the borough, the projected levels of wheelchair users, or the need for wheelchair user dwellings. Much of the available data also does not make a distinction between wheelchair and non-wheelchair users. It is therefore

very challenging for the Council to identify, with any certainty, a level of need for wheelchair user dwellings for the plan period.

- 4.4 The increase in house building rates allowed through the adoption of the Local Plan will allow more homes to be matched to needs. For example, it may be possible to match affordable homes for market sale to the needs of households with specific needs. In addition, the alternative approach of a fixed proportion of M4(3) does not necessarily mean that these homes will be occupied by the households that need to occupy them or that the needs of all wheelchair user households in housing need will be met through new homes. Planning Practice Guidance is clear that Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling<sup>2</sup>.

## **5. Conclusion**

- 5.1 There is a large amount of data available, however, much of it does not allow for further analysis of wheelchair users. There appears to be a lack of basic up to date data on the housing needs of disabled people at the national and local level, and therefore there is a lack of clear evidence of the need to provide a fixed proportion of wheelchair accessible homes M4(3) as part of Policy HS4. Policy HS4 as it stands provides a flexible response to the needs of all residents and potential residents whatever their ability.

---

<sup>2</sup> Planning Practice Guidance Paragraph: 009 Reference ID: 56-009-20150327