

Core Strategy Selective Review

Accessible Housing Need Assessment Background Paper

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Contents

1.	Introduction	Page 3
2.	Policy context	Page 5
3.	Accessible housing standards- overview and application <u>Table 1.</u> Accessible housing standards contained within Part M volume 1 of the Building Regulations <u>Table 2.</u> Key features of accessible housing standards in Part M volume 1.	Page 7 Page 7 Page 9
4.	M4(1) Category 1- visitable dwellings	Page 10
5.	Optional technical standard M4(2) Accessible and adaptable dwellings <u>Table 3.</u> Benefits of an M4(2) dwelling <u>Table 4.</u> Estimated costs of adaptations- standard home Vs lifetime home	Page 13 Page 14 Page 17
6.	Optional technical standard M4(3) Wheelchair user dwellings	Page 18
7.	Need <u>Table 5.</u> likely disability levels (based on national averages) <u>Table 6.</u> SHMA household survey findings <u>Table 7.</u> M4(2) need	Page 23 Page 25 Page 26 Page 27
8.	Recommended policy requirements for accessible housing	Page 30
	<u>Appendix A:</u> SHMA 2017 Evidence of household survey on need for accessible housing	Page 32
	<u>Appendix B:</u> LCC adaptations study M4(2) housing	Page 34
	<u>Appendix C:</u> LCC adaptations study M4(3) housing	Page 40

1. Introduction

- 1.1 In October 2012 the Department of Communities and Local Government (DCLG) launched the Housing Standards Review (HSR).
- 1.2 As a result of the HSR, on 27 March 2015 the Government announced, in a Written Ministerial Statement (WMS)¹, a new national approach to the setting of technical housing standards in England. This was accompanied by the publication of a new set of streamlined national technical standards², which included accessible housing standards³.

New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burden and help bring forward much needed new homes.

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

- 1.3 The accessible housing standards are contained within Part M Volume 1 of the Building Regulations⁴, which provides a 3 tier system of accessible housing standards, two of which are optional standards.
- 1.4 From 1 October 2015, the new optional national accessible standards could be required through the planning process, if requirements are incorporated into planning policy. For this to happen clearly evidenced need, and consideration of impact on viability in accordance with National Planning Policy Framework⁵ and Planning Guidance⁶.
- 1.5 Powers to require these optional requirements are now included in the Building Act 1984 (as amended by the deregulation act 2015)⁷. For a new optional building regulation standard to be applied to a new dwelling, a condition on the planning consent must require it.
- 1.6 This document aims to establish a level of need for M4(2) and M4(3) dwellings in Leeds, to inform new planning policy requiring the optional accessible housing standards via the planning process.
- 1.7 This new planning policy will be introduced via a selective review of Leeds City Councils Core Strategy.

2. Policy Context

¹ <https://www.gov.uk/government/speeches/planning-update-march-2015>

² <https://www.gov.uk/guidance/housing-optional-technical-standards>

³ <https://www.gov.uk/guidance/housing-optional-technical-standards#accessibility-and-wheelchair-housing-standards>

⁴ https://www.planningportal.co.uk/info/200135/approved_documents/80/part_m_-_access_to_and_use_of_buildings

⁵ <https://www.gov.uk/guidance/viability>

⁶ <https://www.gov.uk/government/collections/planning-practice-guidance>

⁷ Building Act 1984 (as amended by the deregulation act 2015).

- 2.1 The National Planning Policy Framework (NPPF) requires that Leeds City Council plan to ensure a choice of high quality homes, suitable for its diverse population, including appropriate levels of accessible housing, stating:

“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...)”⁸

- 2.2 In 2017 the House of Commons Women and Equalities select committee published the findings of their enquiry into disability and the built environment⁹, which highlighted a significant deficit in the availability of accessible housing stating:

“85. Although no definitive figures are available, a wide range of organisations giving evidence to us reported a significant deficit in the availability of homes that met what they considered an acceptable standard of accessibility: these included disabled peoples organisations and local Access Groups, the Design Council, the RTPI, RIBA, British Healthcare Trades Association and other professional bodies. Habinteg, a charity and housing association specialising in accessible homes, told us that there are at least around 300,000 disabled adults whose housing need is unmet, and that this figure was likely to be an under-estimate. Age UK cited research from 2005–06 estimating that over 750,000 people aged 65 and over needed specially adapted accommodation because of a medical condition or disability, and of these, 145,000 reported living in homes that did not meet their needs. Age UK argued that those figures are now likely to be even higher.”

- 2.3 To assist local authorities in achieving the right mix of housing the Government created a new approach for the setting of technical standards for housing, which rationalises the many previous standards into a simpler, streamlined system, which aims to reduce burdens and help bring forwards much needed new homes. The Government set out its policy on the application of these standards in a [Written Ministerial Statement](#).¹⁰
- 2.4 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 are required to gather evidence to determine whether there is a need for additional

⁸ <https://www.gov.uk/guidance/national-planning-policy-framework/6-delivering-a-wide-choice-of-high-quality-homes>

⁹ <https://publications.parliament.uk/pa/cm201617/cmselect/cmwomeq/631/631.pdf>

¹⁰ <https://www.gov.uk/guidance/housing-optional-technical-standards>

standards in their area, and justify setting appropriate policies in their Local Plans.¹¹

- 2.5 Planning practice guidance also explains that local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment.¹²
- 2.6 The adopted Core Strategy does not currently contain any requirements for accessible housing standard. It does contain policy requirements around housing for independent living, but not for accessible housing.
- 2.7 For this reason, it is proposed to introduce a new planning policy to require or 'switch on' the new accessible housing standards.

¹¹ <https://www.gov.uk/guidance/housing-optional-technical-standards>

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

3. Accessible housing standards- overview and application

- 3.1 Three national accessible housing standards were introduced in October 2015 and are contained within Part M volume 1 of the Building Regulations¹³.

Table 1. Accessible housing standards contained within Part M volume 1 of the Building Regulations

Standard label	Standard title	Level of accessibility provided	Mandatory or optional
M4(1)	Visitable dwellings	Level access not necessarily provided into the dwelling- few accessible features	Mandatory baseline
M4(2)	Accessible and adaptable dwellings	Level access is provided into the dwelling- easy to adapt to make more accessible- not suitable for most wheelchair users	Optional
M4(3)	Wheelchair user dwellings	Dwellings suitable for wheelchair users: either wheelchair accessible or wheelchair adaptable	Optional

- 3.2 M4(1) visitable dwellings is the mandatory minimum standard applied to all new dwellings (to which Part M of the Building Regulations applies).
- 3.3 M4(2) and M4(3) are optional standards which can only be applied if 'switched on'/ required by planning policy (see section 2) and a condition placed on the planning consent which requires dwellings to be built to these standards.
- 3.4 Only one accessible housing standard can apply to any dwelling- therefore if a dwelling is required to meet an optional accessible housing standard (M4(2) or M4(3))- M4(1) will not also apply.
- 3.5 The type of planning application which the optional accessible housing standards can apply to is determined by the Building Regulations, and their 'limits of application' as defined by the Statutory Instruments 2010 No. 2214 Building and Buildings, England and Wales, The Building Regulations 2010¹⁴, amended by Statutory Instruments 2015 No. 767 Building and Buildings, England and Wales The Building Regulations &c. (Amendment) Regulations 2015¹⁵.
- 3.6 The definition of development, or 'works' to which Part M of the Building Regulations can apply is defined in these documents, which dictate that

¹³ https://www.planningportal.co.uk/info/200135/approved_documents/80/part_m_-_access_to_and_use_of_buildings

¹⁴ http://www.legislation.gov.uk/ukxi/2010/2214/pdfs/ukxi_20102214_en.pdf



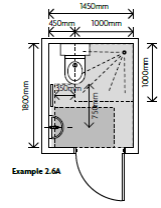

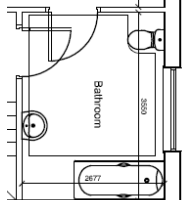
¹⁵ http://www.legislation.gov.uk/ukxi/2015/767/pdfs/ukxi_20150767_en.pdf

the requirements of Part M volume 1 generally only apply to new build dwellings.

- 3.7 New build dwellings does not 'cover' purpose built student accommodation- under the Building Regulations, student accommodation is classified as hotel accommodation- which is defined (in terms of access for disabled people) by Part M volume 2 of the Building Regulations¹⁶, which requires 1 in 20 rooms to be wheelchair accessible.
- 3.8 For this reason, any planning policy which requires accessible housing (i.e. via the optional accessible housing standards provided in Part M volume 1), will not also apply to student accommodation. This assessment of 'need' will therefore not apply to, or take into account student accommodation.
- 3.9 Table 2 (below) illustrates key features provided by the different accessible housing standards contained in Part M volume 1.

¹⁶ https://www.planningportal.co.uk/info/200135/approved_documents/80/part_m_-_access_to_and_use_of_buildings/2

Table 2. Key features of accessible housing standards in Part M volume 1.

Feature	Picture	M4(1) Visitable dwellings	M4(2) Accessible and adaptable dwellings	M4(3) Wheelchair user dwellings
Guidance on accessible parking bay size (to be applied where parking required by planning)		✗	✓ Where parking is provided: additional space to one side- not full sized disabled persons parking bay	✓ Where parking is provided: space for full size disabled persons parking bay.
Level access into the dwelling		✗ Level access may not necessarily be provided into the dwelling	✓	✓
Ground floor toilet suitable for disabled person or wheelchair user		✗ Ground floor toilet provided but design would be un- usable for many disabled people to use with dignity i.e. being able to close the door	✓	✓
Bathroom and WC/ cloakroom walls strong enough to support grabrails, seats and other adaptations.		✗	✓	✓
Wheelchair accessible kitchen and bathroom or can be adapted to be wheelchair accessible		✗	✗	✓

4. M4(1) Category 1- visitable dwellings

- 4.1 M4(1) visitable dwellings is not an optional housing standard, it is the mandatory national baseline standard which is applied to all dwellings to which Part M of the Building Regulations applies (unless one of the optional standards either M4(2) or M4(3) is to apply). The requirements of M4(1) are cited in Part M of the Building Regulations as:

Requirement M4(1): Category 1 – Visitable dwellings

This section of the approved document deals with the following requirement from Part M of Schedule 1 to the Building Regulations 2010.

Requirement	Limits on application
Category 1 – visitable dwelling Access and use M4(1). Reasonable provision should be made for people to— (a) gain access to; and (b) use, the dwelling and its facilities	Requirement M4(1) does not apply to: (a) an extension to a dwelling; or (b) any part of a building that is used solely to enable the building or any service or fitting in the building to be inspected, repaired or maintained.

Performance

In the Secretary of State's view, requirement M4(1) will be met when a new dwelling makes reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey. Reasonable provision is made if the dwelling complies with all of the following.

- Within the curtilage of the dwelling or the building containing the dwelling, it is possible to approach and gain access to the dwelling.
- It is possible to gain access to the dwelling, or the building containing the dwelling, from the most likely point of alighting from a car.
- A disabled person who is able to walk is able to visit any dwelling in a building containing one or more dwellings.
- Visitors can access and use the habitable rooms and a WC within the entrance storey of the dwelling (or the principal storey where the entrance storey does not contain a habitable room).
- Where the habitable rooms and the WC are located on the entrance storey, access between them is step free.
- Wall-mounted switches and socket outlets in habitable rooms are reasonably accessible to people who have reduced reach.

- 4.2 This standard was contained in the previous 2004 edition of Part M¹⁷ of the Building Regulations as a minimum baseline, and its requirements remain unchanged in the 2015 edition¹⁸.

- 4.3 M4(1) provides a very basic level of accessibility and in practice may not result in the provision of level access into the dwelling.

¹⁷

http://webarchive.nationalarchives.gov.uk/20141202130611/http://www.planningportal.gov.uk/uploads/br/BR_PDF_AD_M_2004.pdf

¹⁸ https://www.planningportal.co.uk/info/200135/approved_documents/80/part_m_-_access_to_and_use_of_buildings

- 4.4 As M4(1) is a mandatory baseline standard it is automatically applied via the Building Regulations where an optional housing standard has not been applied, and is not subject to planning policy or planning conditions.

5. Optional technical standard M4(2) Accessible and adaptable dwellings

- 5.1 M4(2) is an optional technical standard contained within Part M volume 1¹⁹ of the Building Regulations, and can be applied to a dwelling if 'switched on' i.e. required by a planning condition.
- 5.2 The requirements of M4(2) are cited as:

Optional requirement M4(2): Category 2 – Accessible and adaptable dwellings

This section of the approved document deals with the following optional requirement from Part M of Schedule 1 to the Building Regulations 2010.

Requirement	
<i>Optional requirement</i>	<i>Limits on application</i>
Part M access to and use of buildings	
Category 2 – accessible and adaptable dwellings	
M4(2) optional requirement	
(1) Reasonable provision must be made for people to— (a) gain access to; and (b) use, the dwelling and its facilities.	(a) may apply only in relation to a dwelling that is erected; (b) will apply in substitution for requirement M4(1); (c) does not apply where optional requirement M4(3) applies;
(2) The provision made must be sufficient to— (a) meet the needs of occupants with differing needs, including some older or disabled people; and (b) to allow adaptation of the dwelling to meet the changing needs of occupants over time.	(d) does not apply to any part of a building that is used solely to enable the building or any service or fitting in the building to be inspected, repaired or maintained.

Performance

In the Secretary of State's view, optional requirement M4(2) will be met where a new dwelling makes reasonable provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users. Reasonable provision is made if the dwelling complies with all of the following.

- Within the curtilage of the dwelling, or of the building containing the dwelling, it is possible to approach and gain step-free access to the dwelling and to any associated parking space and communal facilities intended for the occupants to use.
- There is step-free access to the WC and other accommodation within the entrance storey, and to any associated private outdoor space directly connected to the entrance storey.
- A wide range of people, including older and disabled people and some wheelchair users, are able to use the accommodation and its sanitary facilities.
- Features are provided to enable common adaptations to be carried out in future to increase the accessibility and functionality of the dwelling.
- Wall-mounted switches, socket outlets and other controls are reasonably accessible to people who have reduced reach.

- 5.3 M4(2) dwellings are flexible, adaptable and will be suitable for the majority of the population. The features of an M4(2) dwelling will benefit many disabled people, older people, families with young children, people with temporary impairments or injuries or people carry items or moving objects.

¹⁹ https://www.planningportal.co.uk/info/200135/approved_documents/80/part_m_-_access_to_and_use_of_buildings

5.4 Table 3. Below highlights some of the benefits of, and people who would benefit from an M4(2) home:

Table 3. Benefits of an M4(2) dwelling

People	Design feature(s)/ benefit
People with an ambulant mobility difficulty	All M4(2) provisions; including the specific provision of level access, and the ability of an M4(2) home to easily and cheaply incorporate and accommodate adaptations required which may be required, for example- bathroom, WC or cloakroom walls reinforced to accommodate grab rails, seats or other adaptations.
People who are blind or partially sighted	Suitable and uniform switch and socket locations and heights. Space and manoeuvring zones- could be particularly beneficial for someone using a guide dog.
Families with young children	Provision of level access- benefit for people using push chairs or prams. Suitable clear opening width of doors and gates for push chair or pram access. Suitably sized ground floor toilet to allow assisted/ accompanied use.
Older people	All M4(2) provision can have a positive impact on the mobility and independence of this group within the home. May enable people to stay in their home for longer, or return home sooner after a hospital stay. Many common age related adaptations (grabrails within bathroom, WC or cloakroom etc.) can be fitted with ease due to the provision of relevant design features (reinforced walls).
Some wheelchair users	M4(2) is not a wheelchair accessible housing standard, however some wheelchair users will at least be able to visit an M4(2) dwelling. Some wheelchair users may be able to live in an M4(2) dwelling, however the storage of wheelchairs may be difficult- depending upon the size of the home.
People with temporary impairments or injuries	Someone's mobility can be affected by various events throughout their life. It would be very unusual for someone to not experience a life event which affects their mobility to some extent, for example injuries and post (or pre) operation periods. M4(2) features may enable people to return to their homes from hospital sooner. People could also potentially 'live' on the entrance storey on a temporary basis of an M4(2) home.
People moving large items/ moving home	Level access (whether level or via a lift) will benefit people moving home or moving or carrying large items, or even carrying shopping.

M4(2) and Lifetime Homes

- 5.5 M4(2) accessible and adaptable dwellings standard is based on, and in 2015 effectively replaced, the 'Lifetime Homes' (LTH) standard²⁰.
- 5.6 Lifetime homes were described as 'ordinary homes' designed to incorporate 16 design criteria that can be universally applied to new homes at minimal cost to provide flexibility and adaptability. Each design criteria/ feature adds to the comfort and convenience of the home, and supports the changing needs of individuals and families living in the home at different stages of life.
- 5.7 The Department of Communities and Local Government (DCLG) in 2007 published their document 'The future of the code for sustainable homes'²¹, highlighting the benefits of lifetime homes:
- "Where they are adopted they ensure that homes are better able to adapt to the needs of their occupants at different stages of their life – as they grow and as they age. They also ensure that, when faced with a sudden crisis such as an incapacitating accident, injury or illness, the families living in these homes are able to make short-term adaptations to allow time to consider future needs, and longer-term adaptations should their wish be to remain the family home... Ultimately, the indirect health benefits associated with the Lifetime Homes Standard focus on improving the quality of life of occupants. The Partial Regulatory Impact Assessment (PRIA) – Lifetime Homes⁷ suggests that implementing the Lifetime Homes Standard would have the following impacts on health and costs attributed to health:
- reduce, or delay the need for people to move to residential care
 - reduce the demand for temporary residential care
 - ensure that people are discharged from hospital into suitable accommodation instead of remaining in hospital in much needed acute hospital beds because their accommodation is unsuitable
 - reduce the need for home care for disabled people...
- ...they ensure that homes are better able to adapt to the needs of their occupants at different stages of their life – as they grow and as they age. They also ensure that, when faced with a sudden crisis such as an incapacitating accident, injury or illness, the families living in these homes are able to make short-term adaptations to allow time to consider future needs, and longer-term adaptations should their wish be to remain the family home."
- 5.8 The 2007 DCLG document also explained that the home building market was not reacting as quickly as necessary to meet the dramatic changes, and that if action is not taken to make sure the homes that are built meet the needs of an ageing population, this country will face increasing difficulties in meeting the populations needs over the coming decades.²²
- 5.9 In 2012 DCLG commissioned a report 'Assessing the health benefits of Lifetime Homes'²³ which was produced by the Building Research

²⁰ <http://www.lifetimehomes.org.uk/>

²¹ <http://www.lifetimehomes.org.uk/data/files/Reports/makingaratingmandatory.pdf>

²² <http://www.lifetimehomes.org.uk/data/files/Reports/makingaratingmandatory.pdf>

²³

https://www.housinglin.org.uk/_assets/Resources/Housing/OtherOrganisation/Health_benefits_of_Lifetime_Home_Standards.pdf

Establishment (BRE), and highlighted some of the cost savings associated with Lifetime Homes:

“The total cost of building-related hazards is calculated to be approximately £2.48bn per annum in direct health costs or £40bn as a potential cost to society. Homes built to current building regulations offer significant health advantages over the average stock, and may provide direct NHS health cost savings per dwelling in excess of £4,000 during a 60-year expected lifespan. Building to the Lifetime Homes Standard could provide an extra £194 of savings over 60 years, or £700 if the potential adaptations to bathrooms and access to a bedroom/bathroom were made.

When considering the potential cost to society, the savings are likely to be much higher. Using the model, it is suggested that a home built to current building regulations could save £83,000 during a 60-year lifespan, compared to the average for the current stock. Building to the Lifetime Homes Standard could provide a further £1,600 in savings, or £8,600 if the potential adaptations were made.”

- 5.10 Leonard Cheshire’s 2014 publication ‘The hidden housing crisis’²⁴ provided a comparison of costs of adapting a standard non LTH dwelling against a LTH, highlighting that incorporating the 16 design criteria of LTH to new homes could be done at an average cost of £1,100. This makes the new homes ‘easily adaptable’. It then compared the costs of making simple adaptations to a LTH dwelling, as opposed to a standard dwelling- and found that the adaptations to the standard dwelling could cost more than five times the cost of those adaptations to a LTH, estimates are provided in Table 4. below:

Table 4.Estimated costs of adaptations- standard home Vs lifetime home

	Cost of adaptation in a standard home	Cost of adaptation in a Lifetime Home*
Installing a ramp	£450	£0
Widening entrance door	£2,500	£0
Widening internal doors	Estimating this could be four doors, the total would be £2,000	£0
Installing a stair-lift	£9,600	£2,400
Installing ten grab bars	£2,500	£500
Wet-room conversion of bathroom	£3,500	£0
Initial building costs	£0	£1,100
Total	£20,550	£4,000

*It is £0 where it is unnecessary as it comes as standard

(Leonard Cheshire 2014 The hidden housing crisis²⁵.)

- 5.11 M4(2) accessible and adaptable dwellings standard has effectively ‘replaced’ the LTH standard, providing a very similar standard, similar design requirements and at least the same level of accessibility (although M4(2) is slightly more onerous on the provision of level access). It is therefore fair to

²⁴ <https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

²⁵ <https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

assume that the benefits of and cost savings associated with LTH dwellings are also provided by M4(2) dwellings.

6. Optional technical standard M4(3) Wheelchair user dwellings

- 6.1 M4(3) is an optional technical standard contained within Part M of the Building Regulations²⁶, and can be applied to a dwelling if 'switched on' i.e. required by a planning condition.
- 6.2 The requirements of M4(3) are cited in Part M of the Building Regulations as:

Optional requirement M4(3): Category 3 – Wheelchair user dwellings

This section of the approved document deals with the following optional requirement from Part M of Schedule 1 to the Building Regulations 2010.

Requirement	Limits on application
Optional requirement Category 3 – wheelchair user dwellings M4(3) optional requirement	Optional requirement M4(3)–
(1) Reasonable provision must be made for people to— (a) gain access to, and (b) use, the dwelling and its facilities.	(a) may apply only in relation to a dwelling that is erected; (b) will apply in substitution for requirement M4(1); (c) does not apply where optional requirement M4(2) applies;
(2) The provision made must be sufficient to— (a) allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs; or (b) meet the needs of occupants who use wheelchairs.	(d) does not apply to any part of a building that is used solely to enable the building or any service or fitting in the building to be inspected, repaired or maintained. Optional requirement M4(3) (2)(b) applies only where the planning permission under which the building work is carried out specifies that it shall be complied with.

Performance

In the Secretary of State's view, optional requirement M4(3) will be met where a new dwelling makes reasonable provision, either at completion or at a point following completion, for a wheelchair user to live in the dwelling and use any associated private outdoor space, parking and communal facilities that may be provided for the use of the occupants. Reasonable provision is made if the dwelling complies with all of the following.

- Within the curtilage of the dwelling or of the building containing the dwelling, a wheelchair user can approach and gain step-free access to every private entrance to the dwelling and to every associated private outdoor space, parking space and communal facility for occupants' use.
- Access to the WC and other accommodation within the entrance storey is step-free and the dwelling is designed to have the potential for step-free access to all other parts.
- There is sufficient internal space to make accommodation within the dwelling suitable for a wheelchair user.
- The dwelling is wheelchair adaptable such that key parts of the accommodation, including sanitary facilities and kitchens, could be easily altered to meet the needs of a wheelchair user or, where required by a local planning authority, the dwelling is wheelchair accessible.
- Wall-mounted switches, controls and socket outlets are accessible to people who have reduced reach.

- 6.3 The optional requirement M4(3) states that reasonable provision must be made for people to gain access to, and use the dwelling and its facilities, and that this provision must be sufficient to either; allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs, or meet the needs of occupants who use wheelchairs (from the outset).
- 6.4 M4(3) homes are designed to be either:
- Wheelchair accessible M4(3)(2)(b); or
 - Wheelchair adaptable M4(3)(2)(a)

²⁶ https://www.planningportal.co.uk/info/200135/approved_documents/80/part_m_-_access_to_and_use_of_buildings

- 6.5 Part M volume 1 of the Building Regulations²⁷ explains how M4(3)(2)(b) and M4(3)(2)(a) standards should be applied if 'switched on' by planning condition, stating:
"0.5 Where a local planning authority sets a planning condition for Category 3 (wheelchair user) housing it can specify which dwellings should be wheelchair accessible by including in the planning permission a condition stating that optional requirement M4(3)(2)(b) applies. Where no such condition is applied, optional requirement M4(3)(2)(a) will apply by default requiring that dwellings should be wheelchair adaptable."
- 6.6 Certain design features need to be provided to enable a wheelchair user to live in and use a home. Wheelchair adaptable homes are designed to incorporate the space, electrical and plumbing requirements to allow a property to become wheelchair accessible for a particular user at a later date, easily and cheaply.
- 6.7 Wheelchair accessible homes are designed to be usable for a wheelchair user from the outset i.e. at point of completion a wheelchair user could live in the home and it is 'kitted out' with all the services equipment required.
- 6.8 Planning Practice Guidance²⁸ has been provided by DCLG on wheelchair accessible and wheelchair adaptable units, which explains that Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily usable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.
- 6.9 It goes on to explain that a local plan policies should only require a wheelchair accessible dwelling (as opposed to a wheelchair adaptable dwelling), where they are responsible for allocating or nominating the person who will be living in that dwelling. Generally M4(3) market homes are likely to be wheelchair adaptable dwellings as opposed to wheelchair accessible dwellings.
- 6.10 Habinteg housing association and the Town and Country Planning Association (via Habinteg's wheelchair accessible housing toolkit²⁹) cite Aspire research which was undertaken in 2014 and found that fewer wheelchair accessible homes were built in 2013 than in 2005, and that there are around 24,000 wheelchair users in England waiting for appropriate social or affordable housing.
- 6.11 Habinteg research³⁰ undertaken in 2010 found that:
- The majority of homes in England (84%) do not allow someone using a wheelchair to get to and through the front door without difficulty and only 0.5% of homes are reported to be 'accessible and adaptable'.
 - There were around 607,200 wheelchair users in England, living in some 586,700 households (figures updated), spread across all tenures.
 - The estimate of wheelchair user households in England with unmet housing needs is 78,300, which translates to 240 households in an 'average' local (housing) authority with a total of 68,064 households.

²⁷ https://www.planningportal.co.uk/info/200135/approved_documents/80/part_m_-_access_to_and_use_of_buildings

²⁸ <https://www.gov.uk/guidance/housing-optional-technical-standards>

²⁹ <https://www.habinteg.org.uk/toolkit-data-on-wheelchair-accessible-housing>

³⁰ <https://www.habinteg.org.uk/toolkit-data-on-wheelchair-accessible-housing>

- 6.12 The introduction of planning policy to require wheelchair accessible or adaptable dwellings in accordance with M4(3) would assist creating a housing market which could increase choice for wheelchair users.
- 6.13 Below are elevational views and plans of a home designed (for Leeds City Council) to M4(3) wheelchair accessible standards.



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PROJECT
**ACCESSIBLE
DWELLING**

TITLE
**ELEVATIONS OF SEMI
DETACHED**

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7. Local need

- 7.1 Both national and local data and statistics will be used to accurately assess local 'need' for accessible housing. The process will focus on the population groups who would benefit from the provision of accessible housing, including disabled people (which includes wheelchair users) older people, and families with young children.
- 7.2 Appendix 2 provides data on the potential assumed 'need' via Leeds City Council's adaptation spend records for adaptations which would either not have been necessary or could have been undertaken at a reduced cost if the home being adapted were an M4(2) dwelling.
- 7.3 Appendix 3 provides data on the potential assumed 'need' via Leeds City Council's adaptation spend records for adaptations which would either not have been necessary or could have been undertaken at a reduced cost if the home being adapted were an M4(3) dwelling.
- 7.4 The information contained within these 3 appendixes illustrates significant 'need' in Leeds for accessible housing, whether it be to an M4(2) or M4(3) standard.
- 7.5 In addition to this, DCLG's 'Guide to available disability data'³¹ provides the following data covering households which contain someone with a long term illness or disability, and those which contain a wheelchair user:

³¹

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/416475/150323_Guide_to_disability_data_final_web_version.pdf

The wider picture

The following tables provide information on the current situation on demographics and housing stock across England. This will provide a general indication of the current situation on disabled housing need. The tables include information on:

- vulnerable and disadvantaged groups
- older households
- household projections
- housing stock and visitability features.

Vulnerable and disadvantaged households as percentage of total households

England	2011	Tenure			All households
		Owner Occupier	Private Rented	Social Rented	
<i>Thousands (Percentage)</i>					
Households with reference person with long term illness or disability ¹		3,857 (26.8)	813 (21.9)	1,859 (48.5)	6,528 (29.8)
Households with one or more wheelchair users ²		-	-	-	726 (3.3)
<i>Thousands (percentage)</i>					
Total Households		14,368 (100.0)	3,716 (100.0)	3,834 (100.0)	21,918 (100.0)

Source: English Housing Survey 2011 to 2012, household report, annex table 6.1 & 6.11

¹ Long term illness is anything that has troubled the household reference person over a period of time, or that is likely to affect them over a period of time (English Housing Survey: Questionnaire documentation 2011 to 2012)

² Note households with one or more wheelchair users is included as part of Households with long term illness or disability

7.6 The Papworth Trust 'Disability in the United Kingdom 2016 facts and figures'³² explains that the distribution of disabled people is fairly evenly spread across the UK. The North East, Wales, the North West and East Midlands have the highest rates of disability, whilst London and the South East and the East of England have the lowest.

7.7 Assuming a 'fairly even' distribution, and that Leeds has 'average' numbers of disabled people, and based on the above 2011 statistics provided by DCLG, it is possible to produce the following Leeds specific table showing (likely) levels of disability within the population, using the population total for Leeds of 784,700 (SHMA table 3.9).

³²

<http://www.papworthtrust.org.uk/sites/default/files/Disability%20Facts%20and%20Figures%202016.pdf>

Table 5. Leeds likely disability levels (based on national averages)

Thousands (percentage)	Tenure			All households
	Owner occupier	Private rented	Social rented	
Households with reference person with long term illness or disability	52,069 (26.8%)	42,549 (21.9%)	94,229 (48.5%)	100,516 (29.8%)
Households with one of more wheelchair users	-	-	-	11,131 (3.3%)
Thousands (percentage) Total households	194,286 (100%)	67,123 (100%)	75,893 (100%)	337,302 (100%)

7.8 Government has published the following statistics³³ on households with a reference person over the age of 65, and projections and likely change for these statistics to 2021:

Household Projections			
England	2011	2021	Percentage change
<i>Thousands</i>			
Households with reference person under 65	16,153	17,178	6
Households with reference person 65-74	2,974	3,429	15
Households with reference person between 75-84	2,143	2,544	19
Households with reference person over 85	832	1,157	39
Total households with reference person over 65	5,949	7,130	20
Total Households	22,102	24,307	10
Source: Household interim projections in England, 2011 to 2021, table 2a			

7.9 The incidence of disability increases with age. The Papworth Trust³⁴ explains that in 2012/13:
-7% of children were disabled (0.9 million)

³³

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/416475/150323_Guide_to_disability_data___final_web_version.pdf

³⁴

<http://www.papworthtrust.org.uk/sites/default/files/Disability%20Facts%20and%20Figures%202016.pdf>

- 16% of adults of working age were disabled (6.1 million), and
- 42% of adults over state pension age were disabled (5.1 million)

- 7.10 The Strategic Housing Market Assessment (SHMA) 2017 provides evidence of housing need up to 2033. Part of this exercise was the Household Survey which was undertaken in May 2017 and provides detailed information to help provide a picture and understanding of the real housing needs and aspirations of Leeds residents.
- 7.11 Appendix 1 presents data sourced from the Strategic Housing Market Assessment (SHMA) 2017, specifically:
- the number and percentage of households in Leeds containing a disabled person
 - the number and percentage of households in Leeds containing an older person (65 years +)
 - the number and percentage of households in Leeds containing a younger person (under 4 years of age)
- 7.12 These groups have been identified in this assessment as they are most likely to benefit from the design features provided by the optional accessible housing standards – as highlighted in tables 2 and 3.
- 7.13 The SHMA also provides data on :
- households whose current home has been adapted or purpose built due to someone's disability
 - households whose reason for previously moving was the need for housing suitable for an older or disabled person
 - households who felt the reason for them moving in the next 5 years would be to move into housing suitable for an older or disabled person
 - households which need adaptations for a wheelchair user now and in 5 years time
 - the combined data for households who need adaptations for a wheelchair user now and households which contain a member with a disability.
- 7.14 Table 6 below presents and combines the SHMA data provided in Appendix 1 to provide a picture of need for accessible housing in Leeds.

Table 6. SHMA household survey findings

	Number of households	Percentage of households
Population levels		
Households containing 1 or 2 members with a disability	53,334	15.8%
Households containing an older person aged 65+	78,199	23.2%
Households containing a younger person under 4 years of age	39,894	11.8%
Suitability of accommodation		
Current home has been adapted or purpose built for someone's disability	28,740	8.7%
Reason for previously moving home: needed housing suitable for older / disabled person	4,543	3.80%
Reason for moving home in the next 5 years: Need housing suitable for older / disabled person	3,936	6.00%
Wheelchair adaptations		
Households which need wheelchair adaptations now	3,647	1.10%
Households which need wheelchair adaptations in the next 5 years	7,617	2.30%
Total: households which need wheelchair adaptations now + in the next 5 years	11,264	3.30%

Note: it is not possible to provide totals for these figures as this would result in some double counting.

- 7.15 It is difficult from the data presented above to accurately ascertain how many households contain a wheelchair user in Leed. However given that 3.3% of households cited a need for wheelchair adaptations either now or in the next 5 years, it is possible to say that it is likely at least 3.3% of households in Leeds contain a wheelchair user (however this figure may be higher). This is also reflected in Table 5 Leeds likely disability levels (based on national averages) and the national picture highlighted in 7.5.
- 7.16 The national picture (7.5 above) states that 29.8% of all households contain a reference person with a long term disability or illness, which could equate to 100,561 households in Leeds (Table 5). The SHMA suggests that 15.8% of households in Leeds contain 1 or 2 members who are disabled. The likely reason for this significant difference between the national picture and the SHMA findings will be differing definitions between the two studies of 'long term disability or illness' and 'disability'.
- 7.17 Table 7 below provides 2 total need figures for M4(2) housing in Leeds, which have been derived from Leeds SHMA data. Two total need figures have been provided to avoid double counting of some disabled people, the

first of which takes into account households containing a young person under the age of 4 and the second of which does not take into account this group. As although many of the design features provided by the optional accessible housing standards would be of benefit to households with children under the age of 4, they would be unlikely to be considered essential for these households to live there- as they could be for households containing an older or disabled person.

7.18 It should however be noted that some double counting will still exist, for example some households will contain both an older person aged 65+ and a young person under 4 years of age. The data in table 6 should therefore be taken as an indication of need and not strict and definitive figure.

7.19 Table 6 also provides data indicating likely need for wheelchair housing (derived from table 5 above), and this has been taken off the two totals below- as M4(2) housing is unlikely to be suitable for full time wheelchair users.

Table 7. M4(2) local need

	Number of households	Percentage of households
Population levels		
A. Households containing 1 or 2 members with a disability	53334	15.8%
Households containing an older person aged 65+	78199	23.2%
B. Households containing an older person aged 65+ excluding disabled people aged 65+	54875	16.3%
C. Combined A + B	108209	32.1%
A. Households containing 1 or 2 members with a disability + B. Households containing an older person aged 65+ excluding disabled people aged 65+		
A. - F. (below)= i.e. total households containing a disabled person, older person, excluding households in need of wheelchair adaptations (and therefore likely to need M4(3) wheelchair housing= M4(2) need taking into account households containing: -a disabled person -an older person 65 years+ Excluding disabled people in need of wheelchair user housing	96945	28.7%
Households containing a younger person under 4 years of age	39894	11.8%

D. Households containing a younger person under 4 years of age excluding disabled younger person under 4 years of age	39738	11.8%
E. Combined number and households and percentage of households: A. Households containing 1 or 2 members with a disability + B. Households containing an older person aged 65+ excluding disabled people aged 65+ + C. Households containing a younger person under 4 years of age excluding disabled younger person under 4 years of age	147947	43.9%
F. Total from table 5 above: Total: households which need wheelchair adaptations now + in the next 5 years	11264	3.30%
E. – F. above= i.e. total households containing a disabled person, older person or younger person, excluding households in need of wheelchair adaptations (and therefore likely to need M4(3) wheelchair housing= M4(2) need taking into account households containing: -a disabled person -an older person 65 years+ -a younger person under 4 years of age Excluding disabled people in need of wheelchair user housing	136683	40.5%

7.20 Table 7 therefore shows two different scenarios in terms of how many households in Leeds would benefit from accessible housing. Taking into account households with young children, older people and disabled people **40.2% of households require/ would benefit from M4(2) housing**, taking into account just older people and disabled people it is **28.7% households require/ would benefit from M4(2) housing**.

7.21 As explained above it is difficult to definitively state whether families with young children require, or would benefit from accessible housing- it is recommended that a mid-point figure between the two totals above is taken as an indication of the current 'need' for accessible and adaptable M4(2) housing in Leeds.

7.22 These calculations have **not** taken into account age projections, and as the incidence of disability increases with age, see 7.8 above, it is likely that the need for accessible housing will increase in the future, and planning policy requirements should take this into account.

- 7.23 To ensure that people who require accessible housing have some level of choice, the lack of existing accessible housing stock could also be taken into account when determining a level of accessible housing to be required by planning policy. Leeds has not had a planning policy requirement for accessible housing before, it is therefore likely that very limited numbers of dwellings will have been built to an accessible housing standard (whether M4(2), lifetime homes standard, M4(3) or the standard provided by the wheelchair housing design guide). To improve the level of choice and bring forward the point in time at which people who require accessible housing will have choice in the housing they can live in- the percentage requirement for new dwellings to be built to an accessible standard could be increased above the basic level of need, an approach adopted by the Greater London Authority approach to the minor alterations to the London Plan in 2015³⁵ which set accessible housing planning policy requirements for London.
- 7.24 It should however be noted that any percentage requirements for accessible housing are subject to cumulative viability testing³⁶.

³⁵ <https://www.london.gov.uk/what-we-do/planning/london-plan/minor-alterations-london-plan/minor-alterations-london-plan-2015>

³⁶ <https://www.gov.uk/guidance/housing-optional-technical-standards>

8. Needs based recommendations for policy requirements for accessible housing

- 8.1 Based on the evidence of need presented in this document, it is recommended that require, via planning policy:
- 8.2 **35% M4(2) accessible and adaptable dwellings**
- 8.3 **3.5% M4(3) wheelchair user dwellings**
- 8.4 These levels will require cumulative viability assessment along with all other Local Plan policy requirements, in accordance with planning practice guidance³⁷ which states:
“Local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment.”
- 8.5 It is recommended that the above level of accessible housing are viability tested as a reflection of Leeds current ‘need’.

³⁷ <https://www.gov.uk/guidance/housing-optional-technical-standards>

Appendix 1: SHMA 2017 Evidence of household survey on need for accessible housing

No. households in Leeds containing a disabled person

Q18. Member of the household with a disability (1 or 2 members)		
	Number	Percent %
	53,334	15.8
Total households	337,302	

No. households in Leeds containing an older person (aged 65 years +)

HRP			
	Frequency	Percent %	Valid percent %
Under 65 years	259,103	76.8	76.8
Over 65 years	78,199	23.2	23.2
Total	337,302	100	100

No. households in Leeds containing a younger person (under 4 years of age)

Q12. Member of the household aged under 4		
	Number	Percent %
0-4 years	39,894	11.8
Total households	337,302	100

Disability and adaptations

Q19. Current home been adapted or purpose built for disability?		
	Frequency	Percent %
	28,740	8.7
Total households	337,302	100

Q33. (housing history) why did you previously move home?		
Needed housing suitable for older / disabled person	Count	4543
	Column N%	3.80%

Q42. (future moves) why do you think you will move in the next five years?		
Needed housing suitable for older / disabled person	Count	3936
	Column N%	6.00%

Q42 + Q46. Households who wish to move due to needing more suitable housing AND are registered with 'Leeds homes' Choice Based Lettings Scheme

	Numbers	Percent %
Total moving	3,936	
Registered	281	7.10%

Wheelchair users

Q21 Households who need wheelchair adaptations now and in 5 years time

	Numbers	Total households	Percent %
Need now	3,647		1.10%
Need in five years	7,617		2.30%
Total	11,264	337,302	3.30%

Q21 + Q18 Households who need wheelchair adaptations now AND household members with a disability

	Number	Percent %
Total number disabled and who answered the adaptations questions also	36,406	
Need adaptations now	1,638	4.50%

English Housing Survey data on types of wheelchair users suggests the national portion of wheelchair users is around 3.6% and of that only 1.3% use wheelchairs all the time/ indoors.

Appendix 2: LCC adaptations study M4(2) housing

A1. LCCs adaptations services face significant challenges, as highlighted in the Environment and Neighbourhoods, Children and Young People and Adult Social Care, Housing Adaptations Strategy 2010 – 2013:

1.2 Challenges Facing the Adaptations Service

The current adaptations service faces future challenges from three sources

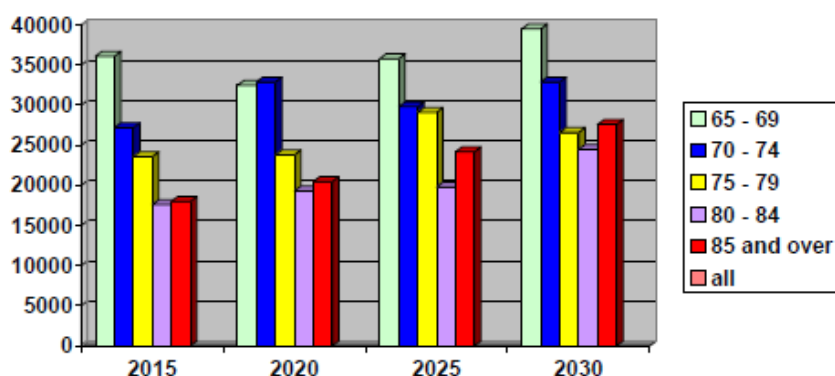
- 1) The increasing demand for adaptations
- 2) Funding challenges
- 3) Delivering services in a personalised way

1) The increasing demand for adaptations

According to the ONS (Office for National Statistics), the number of people nation-wide aged 65yrs or over will increase by 23% by 2019 and by 56% by 2031. The number of people aged 75yrs and over will increase by 70% by 2031.

In Leeds the number of over 65's unable to manage at least one self care activity is predicted to increase by 9% by 2015, and by 17% by 2020. Many of these people will have needs that require adaptations to enable them to achieve independent living and to remain in their own homes. Approximately 70% - 80% of the current adaptations work within the city is provided for older people so this represents a significant projected increase in demand for services.

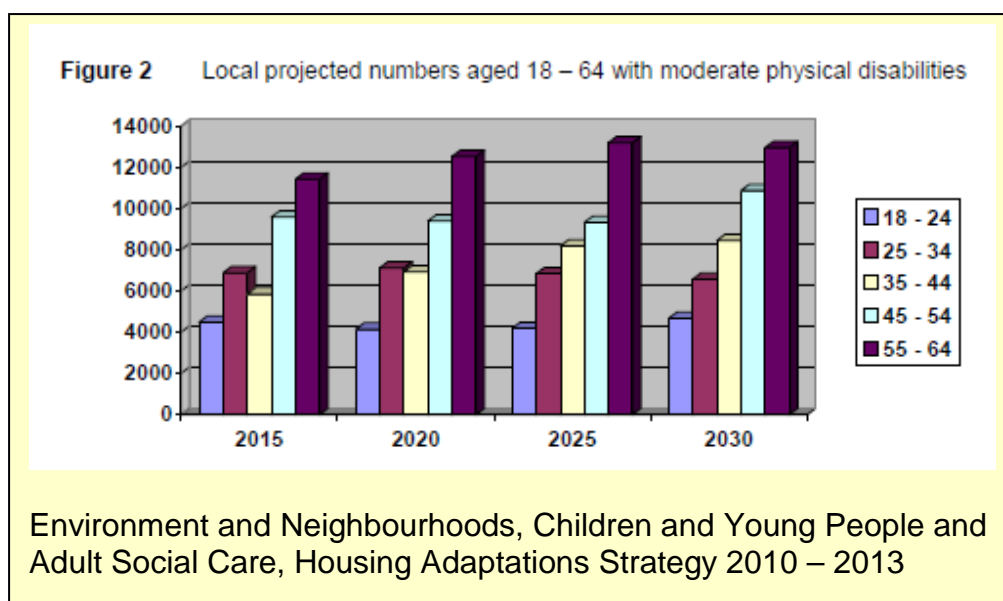
Figure 1 Local projected population for people aged 65 and over



Increasingly, disabled people, including disabled children with high support needs or complex medical conditions are enjoying longer life expectancy and this will also impact on the future demand for adaptations as well as other support services.

Environment and Neighbourhoods, Children and Young People and Adult Social Care, Housing Adaptations Strategy 2010 – 2013

Figure 2 from this strategy highlights the local projected increases in numbers of people aged 18-64 with 'moderate physical disabilities':



LCC completed adaptations 2014/15

Total spend	£5,717,819
Number of grants paid	924
Average grant paid	£6,188

NOTE: These figures are for private sector housing only.

A2. LCC undertake a significant number of adaptations every year to an individuals homes to enable them to remain living in their homes. For the purposes of this report, these adaptations have been scrutinised to gain an understanding of how many of these were:

- a) unlikely to have been required, or;
- b) could have been undertaken at a significantly reduced cost; if the home in question were built to M4(2) standards.

A3. A sample of 1000 pieces of adaptation work has been compiled, starting April 2014. This sample represented a wide ranging geographical distribution throughout the city and is a large enough sample size to be significant.

A4. It is however important to note that each piece of adaptation work is treated in isolation, more than one adaptation may have been undertaken per dwelling, the sample therefore does not represent 1000 dwellings (it was not possible to eliminate double counting dwellings to which more than 1 adaptation was completed on).

A5. As illustrated in Fig 3. below (a), 105 of the 1000 adaptations in the 'sample' are unlikely to have been required if the home were designed and built to the optional technical standard M4(2).

Fig 3. LCC adaptations and M4(2)

Total sample size= 1000 adaptations

Sample= first 1000 adaptations starting April 2014

Average adaptation cost (see Table 2) per adaptation = £6,188

	No. adaptations	Percentage of total
a) No. of adaptations which are <u>unlikely</u> to be required to an M4(2) home	105	10.5%
b) No. of adaptations which <u>may not</u> have been required or could have been undertaken at a reduced cost to an M4(2) home	625	62.5%
c) No. of adaptations which would still be required to an M4(2) home i.e. 1000 (sample size) minus a) minus b) (above)	270	27%
TOTAL	1000	

A6. Examples of adaptation works which would not have been required if the home were an M4(2) home:

- Many of these adaptations involved the installation of permanent or temporary ramps. As M4(2) requires level access to be provided into the home, the installation of a ramp would not be required to an M4(2) home.
- Works to create an accessible garden would also not be required to an M4(2) home as level access is also required to external spaces.

A7. Fig 3. above also illustrates that 625 of the 1000 adaptations in the 'sample' may not have been required, or if still required could have been undertaken at a reduced cost to an M4(2) home (b) above.

A8. The wording 'may not have been required' has been selected in this case as it is very possible the adaptation would not be required, however this could not be said with certainty (and therefore come under category a) above) due to the lack of information provided by the adaptation description.

A9. An example of an adaptation which could have been undertaken at a significantly reduced cost in this table would include the installation of a stair lift. M4(2) states that:

Private stairs and changes of level within the dwelling

- 2.23 To allow people to move between storeys, and to allow a stair-lift to be fitted to the stairs from the entrance storey to the storey above (or the storey below where this contains the bathroom required by the provisions of paragraph 2.29), stairs should comply with all of the following.
- Access to all rooms and facilities within the entrance storey is step-free.
 - Level changes within every other storey are avoided where possible.
 - The stair from the entrance storey to the storey above (or below) has a minimum clear width of 850mm when measured 450mm above the pitch line of the treads (ignoring any newel post).
 - All stairs meet the provisions of Part K for private stairs.

http://www.planningportal.gov.uk/uploads/br/BR_PDF_AD_M1_2015.pdf

A10. Adaptations within the sample of 1000 have not been 'double counted' for the purposes of Fig x. Adaptations have either been categorised into a), b) and those which would not come under a) or b) i.e. adaptations which would still be required to an M4(2) home and would not be addressed on any level by the design criteria contained within are presented under c) which is made up of the total sample (1000), minus adaptations categorised under a), minus adaptations categorised under b).

A11. This means that of the first 1000 adaptations undertaken by Leeds City Council, financial year 2014-2015, only 270 would not be 'addressed' on some level (either avoided or reduced cost) by the technical standard provided by optional building regulation M4(2).

A12. Given the information provided in above highlighting LCC completed adaptations 2014/15, citing the total number of adaptations undertaken by LCC per annum, the and given the resultant average cost per adaptation of £6,188.11, also presents potential cost savings to adaptations undertaken by LCC per annum if they were all undertaken to M4(2) homes.

A13. This indicative cost saving is based on certain assumptions:

- Average cost of an adaptation
- That an adaptation which comes under b) i.e. adaptations which may not have been required or could have been undertaken at a reduced cost to an M4(2) home; is assumed to have a cost saving of half i.e. the adaption would have been achievable at half the cost (average cost). This is a crude broad brush approach, however it is felt that many of the adaptations in this category may not have been necessary at all (3.19 above), and that could be seen as being countered by the fact that some cost savings may not be as great as half-halving the costs therefore takes an average and is felt to be a 'reasonable approach' given the data available.

A14. It is unlikely that Leeds housing stock will ever be 100% M4(2), and Table 3 therefore does not show a potential cost savings per 1000 adaptations.

A15. Table 4 illustrates that the introduction M4(2) housing in Leeds could have a significant impact on the need for adaptations, and the cost of adaptations in the future. In addition to cost savings, social benefits include: people being able to remain in their home for longer, or return home from hospital quicker.

Appendix 3: LCC adaptations study M4(3) housing

B1. LCC undertake a significant number of adaptations every year to individuals homes to enable them to remain living in their homes. For the purposes of this section of this report, these adaptations have been scrutinised to gain an understanding of how many of these were:

- a) unlikely to have been required, or;
- b) could have been undertaken at a significantly reduced cost if the home in question were built to M4(3) standards (wheelchair adaptable).

B2. The first 1000 pieces of adaptation work were taken as a 'sample' from financial year 2014-15. These presented a diverse geographical distribution throughout the city and a large enough sample size to be significant.

B3. It is however important to note that each piece of adaptation work is treated in isolation, more than one adaptation may have been undertaken per dwelling, the sample therefore does not represent 1000 dwellings.

B4. As illustrated in Fig 4 below (a), 105 of the 1000 adaptations in the 'sample' are unlikely to have been required if the home were designed and built to the optional technical standard M4(3).

Fig 4. LCC adaptations and M4(3)

Total sample size= 1000 adaptations

Sample= first 1000 adaptations starting April 2014

Average adaptation cost (see Table 2) per adaptation = £6,188

	No. adaptations	Percentage of total
a) No. of adaptations which are <u>unlikely</u> to be required to an M4(3) home	615	61.5%
b) No. of adaptations which <u>may not</u> have been required or could have been undertaken at a reduced cost to an M4(3) home	179	17.9%
c) No. of adaptations which would still be required to an M4(3) home i.e. 1000 (sample size) minus a) minus b) (above)	206	20.6%
TOTAL	1000	

B5. Examples of adaptation works which would not have been required if the home were an M4(3) home:

- The provision of a ramp
- The provision of wet floor or level access showers

B6. Table 6 also illustrates that 206 of the 1000 adaptations in the 'sample' may not have been required, or if still required could have been undertaken at a reduced cost to an M4(2) home (b) above.

B7. The wording 'may not have been required' has been selected in this case as it is very possible the adaptation would not be required, however this could not be said with certainty (and therefore come under category a) above) due to the lack of information provided by the adaptation description.

B8. An example of an adaptation which could have been undertaken at a significantly reduced cost in this table would include the installation of a hoist as M4(3) requires:

Sanitary facilities

General provisions

3.36 Dwellings should provide suitable toilet and washing facilities. Reasonable provision will vary depending on whether dwellings are wheelchair adaptable or wheelchair accessible. To provide suitable and convenient sanitary facilities, a dwelling should comply with all of the following.

- a. WC facilities are provided which comply with the relevant requirements of paragraphs 3.37 to 3.40, and bathroom facilities are provided which comply with the relevant requirements of paragraphs 3.41 to 3.43.
- b. Any dwelling with four or more bedspaces provides access to a minimum of two WCs in separate bathrooms or WC/cloakrooms (see Table 3.5).
- c. Every room that contains an installed level access shower is constructed as a wet room.
- d. All walls, ducts and boxings to every WC/cloakroom, bath and shower room are strong enough to support grab rails, seats and other adaptations that could impose a load of 1.5kN/m².
- e. The ceiling structure to bathrooms and WC/cloakrooms required by paragraphs 3.36 to 3.40 is strong enough to allow for the fitting of an overhead hoist capable of carrying a load of 200kg.

B9. Adaptations within the sample of 1000 have not been 'double counted' for the purposes of Table 6. Adaptations have either been categorised into a), b) and those which would not come under a) or b) i.e. adaptations which would still be required to an M4(3) home and would not be addressed on any level by the design criteria contained within are presented under c) which is made up of the total sample (1000), minus adaptations categorised under a), minus adaptations categorised under b).

B10. This means that of the first 1000 adaptations undertaken by Leeds City Council, financial year 2014-2015, only 206 would not be addressed on some level

(either avoided or reduced cost) by the technical standard provided by optional building regulation M4(3).

B11. Given the information provided in Table 3 above, citing the total number of adaptations undertaken by LCC per annum, the annual spend of adaptations and given the resultant average cost per adaptation of **£6,188.11**, table 6 also presents potential cost savings to adaptations undertaken by LCC per annum if they were all undertaken to M4(3) homes.

B12. It is unlikely that Leeds housing stock to which adaptations are undertaken will ever be 100% M4(3). Table 6 therefore does not show a potential cost savings per 1000 adaptations, as it is felt that this would be misleading.

B13. However, the table above should illustrate that the introduction of policy requiring a level of M4(3) housing in Leeds could have a significant impact on the need for adaptations, and the cost of adaptations. Benefits beyond cost savings to LCC include: people may be able to remain in their home for longer, or return home from hospital quicker, potentially less significant works/ disruption when adaptations are required.

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Core Strategy Selective Review
Accessible Housing Need Assessment
Background Paper

Leeds Local Plan
Development Plan Document
February 2018