

ADASS response to the consultation: *Proposed reforms to the National Planning Policy Framework and other changes to the planning system*

The Association of Directors of Adult Social Services (ADASS) is the membership charity for Directors of Adult Social Care in councils and their senior teams.

1. Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?

Yes

1.1 Housing provision for older people and accessible housing for disabled people continues to be significantly under-delivered despite a clear demographic need. Many Local Planning Authorities (LPAs) lack the 'intelligence' relating to housing need for disabled people and later living housing (across all tenures). This can often lead to refusal of schemes, despite evidenced need.

1.2 NDMPs should provide clear National Policy certainty on Disabled and Older People's Housing Need including defining such housing (including M4(2), M4(3), Retirement living, Housing with Support, and Housing with Care) within statutory policy. Decision-makers should give significant weight to proposals addressing identified demographic need – and give due cognisance to the local statutory strategic plans for supported housing required by the Supported Housing (Regulatory Oversight) Act.

1.3 LPAs should be required to consider unmet need for housing for disabled people and housing for older people and benefits to Health, Wellbeing, and Social Care should be included in decision making criteria.

1.4 NDMPs must set a mandatory national standard for accessibility, specifically a 100% M4(2) 'accessible and adaptable' standard. Currently, fewer than one in eight (13%) homes in England have the basic four accessibility features that mean they can be visited by someone with access needs. There are also huge regional variations in the proportion of homes that are accessible.

2. Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree.

Please provide your reasons, particularly if you disagree.

2.1 Separating plan-making from decision-making makes the system clearer. However, in relation to older people and disabled people, the plan-making policies must explicitly require LPAs to map the 'infrastructure of care' (including planned adult social care, neighbourhood health and health hubs, accessible housing, and social infrastructure) as a fundamental part of their age-friendly and accessible spatial strategy.

3. Do you agree with the proposed set of annexes to be incorporated into the draft Framework?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Disagree.

Please provide your reasons, particularly if you disagree.

3.1 We disagree with the list of Superseded Statements in Annex A because it doesn't include the Government's announcement in July 2022 regarding the "Raising accessibility standards for new homes" consultation.

3.2 That announcement confirmed that the M4(2) standard would become the mandatory baseline for all new homes, not including it suggests reneging that promise. ADASS, alongside partner organisations, is asking the Government to urgently implement Part M4(2) as the minimum standard and require a minimum percentage of M4(3) homes.

3.3 We also need to address the accessibility needs of people with cognitive needs (e.g., people with dementia) and neuro-divergent needs (e.g., people with a learning disability or autistic people). LPAs therefore also need to align with the new local authority duties set out in the Supported Housing (Regulatory Oversight) Act.

4. Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Agree.

5. Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree

Strongly Agree.

6. Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Agree.

6.1 By 2040, the number of households aged 65 and over will grow by 37% (Older Persons Housing Taskforce 2023) therefore "Housing for our ageing population" should be recognised as a strategic priority. Failure to do so will majorly add to the challenges of our social care system.

7. Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Agree.

If not, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?

7.1 Regular updates would mean that strategies can remain aligned with changing housing, health and social care requirements. A five-year cycle is as the opportunity to keep up with demographic changes, particularly the significant growth in the number of households aged 65 and over, people with complex needs, and increasing diversity.

7.2 There is also the opportunity to align reviews with the similar requirement of the Supported Housing (Regulatory Oversight) Act in relation to the need for supported housing.

8. If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Agree.

Please provide your reasons, particularly if you disagree.

8.1 Allowing housing requirement figures to continue would support continuity in the supply of housing land to maintain momentum for the delivery of accessible and specialist housing.

9. Do you agree with the role, purpose and content of local plans set out in policy PM2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree

Agree.

10. Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan?

Yes.

10.1 Long-term health and social care infrastructure requires significant lead in time and 15 years is an appropriate timeframe for planning (e.g., Extra Care housing or Retirement Village schemes are complex and often have long lead times).

11. Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Agree.

12. Do you agree with the approach to initiating plan-making in PM7? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Agree.

Please provide your reasons, particularly if you disagree

12.1 The structured approach to initiating a plan should facilitate early agreement on housing types, accessibility standards (physical and cognitive deficits), and engagement with health and adult social care partners.

13. Do you agree with the approach to the preparation of plan evidence set out in policy PM8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Agree.

Please provide your reasons, particularly if you disagree.

13.1 Evidence must assess the full spectrum of accessibility and older people's housing needs. Mainstream M4(2) and M4(3) homes should be included, as well as housing with care and/or support. Health and social care data must be used to justify policy choices, not just housing data. This ensures plans are aligned with long-term population health outcomes.

14. Do you agree with the approach to identifying land for development in PM9? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree

Please provide your reasons, particularly if you disagree.

14.1 Identification of appropriate land/sites for housing for disabled people and for older people is essential. Sites must be well-connected to town centres, local communities, and local amenities (the 15-minute neighbourhood).

15. Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree

Please provide your reasons, particularly if you disagree.

15.1 Housing is fundamental to the health and well-being of individuals and communities (and can deliver significant efficiencies both for individuals and the public purse). The policy should require LPAs to work jointly with Integrated Care Boards (ICBs), Partnerships (ICPs), Adult Social Care, and Public Health partners when preparing plans.

15.2 The evidence of local health and social care Joint Strategic Needs Assessments (JSNAs) should be taken into consideration when assessing needs for accessible and specialist housing. Health and Care bodies must be statutory consultees in the Local Plan process to ensure it aligns with national and local health & social care strategies (e.g neighbourhood health).

16. Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree.

Please provide your reasons, particularly if you disagree.

16.1 Obligations in relation to contributions should be linked to the particular developments eg requiring contributions on housing that saves money to the public purse (particularly by reducing health and social care costs) risks viability issues and can increase the need for public subsidy (both capital and revenue)

18. Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree.

Please provide your reasons, particularly if you disagree.

18.1 The reference to M4(2) and M4(3) accessibility standards is positive but the policy should require LPAs to adopt these standards (100%). The needs assessment for M4(3) housing must be undertaken to ensure every local plan is inclusive.

18.2 This is a matter of national health and social care infrastructure and should be optional.

21. Do you agree with the principles set out in policy DM1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Agree

Please provide your reasons, particularly if you disagree.

21.1 ADASS is a strong advocate of co-production and we would encourage stronger reference to community engagement and co-production with local residents and community groups at the pre-application stage.

21.2 Meaningful co-production and community engagement is likely to take place prior to a formal application and will lead to schemes more likely to be well-designed and locally supported. This is especially the case for supported housing and housing for older people.

25. Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree.

Please provide your reasons, particularly if you disagree.

25.1 Viability assessments must be reasonable – this is essential for the Older People’s Housing/Later Living Homes and supported housing which often includes communal areas (and therefore higher capital costs) and higher operational costs than general housing.

36. Do you agree with the revised approach to the presumption in favour of sustainable development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree

Please provide your reasons, particularly if you disagree.

36.1 If sustainable development is defined as meeting the needs of the present without compromising the future we would suggest the presumption in favour of sustainable developments should explicitly recognise the need for housing for older people (by 2040, the number of households aged 65 and over will grow by 37%) and favour developments that are M4(2) compliant (housing stock that is 87% inaccessible is not sustainable).

40. Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree.

Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.

40.1 Development of housing around stations for older people and disabled people is ideal but both the housing and the environment must be if accessible – including step-free stations and platforms (otherwise older and disabled people could be effectively isolated).

48. Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree.

Please provide your reasons, particularly if you disagree.

48.1 ADASS is pleased to see reference to the necessity to assess the need for housing for older people and for disabled people.

48.2 There is an opportunity to also require the plan to take cognisance of the statutory assessment for supported housing as required by the Supported Housing (Regulatory Oversight) Act.

49. Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree.

If so, what elements should this guidance cover?

49.1 The current approach of inconsistent, incomplete, and often outdated needs assessments is producing Local Plans that fail older people, disabled people, and those in housing need. Standardised guidance for supported & specialist housing for disabled people, wheelchair accessible homes and older people's housing is required.

49.2 Current methodologies underestimate need and often use retrospective data rather than future projections. Guidance should require LPAs to review the need in line with 5 year strategies required by the Supported Housing (Regulatory Oversight) Act (and guided by health and social care planning at a local and regional level).

49.3 Guidance must be provided in relation to the assessment of need for housing for wheelchair users – meeting Building Regulation M4(3). Currently many local plans are wholly inadequate in this respect. In the absence of a minimum national target, local targets should be built from a robust assessment of need, drawing on NHS data (eg wheelchair service data), local authority occupational therapy waiting lists, disability benefit data, and other relevant sources.

49.4 Guidance should also require that housing needs assessments are integrated with health and adult social care data, to ensure that the needs of vulnerable households are adequately provided for; including disabled people, people with mental health needs, people with learning disabilities and autistic people.

55. Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly disagree.

Please provide your reasons, particularly if you disagree.

55.1 On large-scale plans should be clearer on the requirements and phasing in relation to social infrastructure.

55.2 Infrastructure, such as, GP practices, community hubs, accessible pavements is essential to inclusive place making. Co-located community assets will support the delivery of inclusive and age friendly communities alongside delivering on key Government health and social care priorities eg the Neighbourhood Health model.

55.3 To be fully inclusive large sites should deliver a mix of housing types for intergenerational living. Housing should be built to M4(2) standards and a set proportion of M4(3) (wheelchair accessible) housing should be mandatory.

57. Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree.

57.1 This is the single most important policy lever for reducing NHS costs and improving population health. Evidence from the Older People's Housing Taskforce demonstrates that unsuitable housing is a main cause of avoidable hospital admissions (e.g., from slips, trips and falls).

57.2 Requiring authorities to set a requirement for 100% M4(2) and a minimum proportion of M4(3) homes is essential to deliver sustainable, future-proof housing that supports independence.

58. Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Disagree

Please provide your reasons, and would you support an alternative minimum percentage requirement?

58.1 This target is too low.

58.2 The proposed 40% target contradicts the Government's own announcement in July 2022, which promised to make M4(2) the mandatory baseline for all new homes.

58.3 A 40% target means that 60% of new homes will still be built to the old, obsolete M4(1) standard. This is building obsolescence into our housing stock from day one. With a 37% increase in the older population coming, every new home should be accessible.

58.4 M4(2) must be the mandatory baseline for 100% of new homes. There is also a severe shortage of wheelchair-accessible homes. The NPPF should require LPAs to assess the specific local need for wheelchair user dwellings and allocate a percentage accordingly.

59. Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly Agree.

Please provide your reasons, particularly if you disagree.

59.1 However, the policy should place a duty on LPAs to identify and allocate specific sites rather than permit them to do so.

59.2 The requirement for development plans to identify sites or set requirements within allocated sites for disabled peoples housing and older people's housing should replicate the requirement in relation to general needs housing and be required to demonstrate a sufficient supply of housing land to meet the full assessed housing need.

60. Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly Agree.

Please provide your reasons and indicate if an alternative site size threshold would be preferable?

60.1 This is essential to create sustainable, inclusive, and mixed communities. It will also develop intergenerational communities which in turn supports the manifestation of strength based communities providing mutual support, creating greater levels of independence and reducing reliance on public services.

62. Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?

Strongly Support.

62.1 The requirement for substantial weight to be given to the benefits of providing accommodation that meets evidenced local needs and preferences is strongly welcomed and has the potential to significantly improve decision-making on applications for older people's housing, specialist housing, and other forms of accommodation addressing identified local need.

72. Do you agree with the criteria set out regarding the locations of specialist housing for older people? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Agree

Please provide your reasons, particularly if you disagree.

72.1 ADASS strongly supports the requirement for specialist housing to be located where residents can access services easily.

72.2 Cognisance should be given to the components of the 'age friendly communities' approach and 15-minute cities.

88. Do you agree with the proposed changes to policy for planning for town centres? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly Agree

Please provide your reasons, particularly if you disagree.

88.1 Older people, and disabled people are ideal residents for town centres. This delivers on the "15-minute neighbourhood" concept and supports the revitalisation of high streets. People spend local and provide natural surveillance (making streets safer).

88.2 Policy should encourage the conversion of empty retail or office space into accessible Later Living Homes.

of meeting the density requirements in chapter 12? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

145. Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly Agree

Please provide your reasons, particularly if you disagree.

145.1 The definition of "sustainable development" should include specialist and supported housing, including Older People's Housing/Later Living Homes and Social Infrastructure. Such sites provide good solutions for retirement communities with space for health and wellbeing facilities.

158. Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly Agree

Please provide your reasons, particularly if you disagree.

158. 1 There should be a clear objective in planning policy to improve health and reduce inequalities.

224. Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic?

Yes

If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.

224.1 *There is significant impact of these proposals on Physically Disabled People, People with a learning disability, Autistic People, and Older People.*

224.2 *If the NPPF only sets a 40% target for accessible homes (M4(2)), the majority of new housing will be inaccessible. This disproportionately disadvantages older and disabled people, limiting their choice and independence and will exacerbate health inequalities.*

225. Is there anything that could be done to mitigate any impact identified?

Yes

225.1 *Require 100% of new homes to be built to a minimum of M4 category standards and a minimum proportion of homes built to M4 category 3 standard.*

About Us

ADASS is a charity. Our objectives include:

- Furthering comprehensive, equitable, social policies and plans which reflect and shape the economic and social environment of the time;
- Furthering the interests of those who need social care services regardless of their backgrounds and status; and
- Promoting high standards of social care services.
- Our members are current and former directors of adult care or social services and their senior staff.

If you have any questions regarding this submission, please do not hesitate to contact Charlotte Newman, Policy and Co-production Lead, Association of Directors of Adult Social Services
charlotte.newman@adass.org.uk