

House of Commons Communities and Local Government Committee: Housing for older people inquiry

The Royal Institute of British Architects champions better buildings, stronger communities and higher environmental standards through the practice of architecture and our 40,000 members. We provide the standards, training, support and recognition that put our members – in the UK and overseas – at the peak of their profession. With government and our partners, we work to improve the design quality of public buildings, new homes and new communities.

The RIBA welcomes this inquiry. Architects have a key role to play in ensuring we meet the challenges of an ageing population. The RIBA has a significant interest in housing design for older people, and we provide information and training to architects on this subject.

We recommend the following Government actions to ensure an adequate provision of housing for older people:

- Introduce a distinct, clear planning use class (or classes) for housing for older people that is designed to Housing our Ageing Population: Panel for Innovation (HAPPI) principles;
- Make it less onerous to adopt accessibility requirements M4(2) and M4(3) into local plans;
- Incorporate the Nationally Described Space standards into the Building Regulations;
- Make it a legal duty for local authorities to maintain an Accessible Housing Register;
- Ensure that housing which meets Building Regulation requirements M4(2) and M4(3) is easily identifiable in sales and lettings markets.

- **The adequacy of provision of homes for older people and the challenges people face in accessing housing which meets their needs.**
1. The RIBA believes that for the provision of homes for older people to be considered adequate, there should be:
 - a. Adequate accessibility and adaptability of general needs housing;
 - b. Specialist provision to cater for the enormous diversity of not only needs but also lifestyle choices of older people;
 - c. Excellence in the design of homes for older people.

Mainstream Housing

2. Many older people may not wish to move home as they get older for very good reasons, such as a desire to stay close to existing neighbours and family members. Accessibility and adaptability of the general stock is therefore important.
3. Part M sets out accessibility requirements the Building Regulations. The baseline, M4(1) 'Visitable Dwellings' (or 'Category 1'), are minimal. In 2015 two higher 'optional requirements' were added. The first higher option, described as M4(2) 'Accessible and Adaptable Dwellings' (or 'Category 2'), is similar to the 16 point 'Lifetime Homes Standard', and the second, M4(3) 'Wheelchair User Housing' or 'Category 3', is a set of measures intended to make a home suitable for a wheelchair user. This category is further divided into 'Wheelchair Accessible Dwellings' (suitable for a wheelchair user to occupy on completion), and 'Wheelchair Adaptable Dwellings' (easily adaptable to become suitable for a wheelchair user at a later date). The RIBA supports these categories, but they will not be useful unless homes are actually built to these specifications.
4. It is good practice for local authorities to set up and maintain an Accessible Housing Register. This should, in theory, provide disabled and older people knowledge about the accessible housing available in areas they want to live. However, few local authorities actually maintain registers.¹ Moreover, those that do have a register use different categories and criteria for accessibility – not necessarily the categories in the Building Regulations. This means that disabled and older people may be unable to find housing with the level of accessibility that suits their needs, even if it may be available.
5. There is also lamentable lack of data on the supply of new and existing accessible homes. This compares unfavourably with the extensive data collected on the supply of new affordable housing.

¹ <https://www.leonardcheshire.org/sites/default/files/no-place-like-home-leonard-cheshire-disability.pdf>

6. English Housing Survey Data shows that that are 160,000 retirement-age households where an adult with a disability has an unmet need for accessible housing.² This is likely the result of inadequate appropriate supply and inadequate information.

Specialised Housing

7. Specialist provision can cater for the enormous diversity of not only needs but also lifestyle choices of older people
8. As was noted by the Housing our Ageing Population: Panel for Innovation (HAPPI), there are a wide variety of different housing options between general use and residential care.³ These include:
 - a. Retirement housing – independent living, where each household has their own front door. It may include 24-hour alarm systems, a warden, lounge, and a programme of activities;
 - b. Extra care - independent living with managed on-site care and support services;
 - c. Close care - independent living with on-site care and support, linked to a care home.
9. There are also different forms of innovative housing solutions for older people. These include:
 - a. Co-housing - self-organised "intentional communities" of older people, who may share facilities to a greater or lesser extent depending on preferences.
 - b. Multigenerational housing - typically older and younger generations of the same family living under the same roof in UK (e.g. "granny flats"). However, on the Continent there are also highly successful schemes of multigenerational housing where residents are unrelated. This allows for greater social inclusion of older people, while bringing benefits to other residents, such as childcare.⁴
10. Housing design can have an enormous effect upon the wellbeing of older people. It also affects the intrinsic attractiveness of housing schemes for older people. The included case study of St Bede's Extra Care, Bedford, which won a 2016 RIBA East Award, demonstrates what can be achieved. Again, the HAPPI have outlined some general principles, which the RIBA endorse.^{5 6}

² <http://sticerd.lse.ac.uk/dps/case/cr/casereport109.pdf>

³ <https://www.gov.uk/government/publications/housing-our-ageing-population-panel-for-innovation>

⁴ <http://www.homerenaisancefoundation.org/docs/thinkpiece.pdf>

⁵ <https://www.gov.uk/government/publications/housing-our-ageing-population-panel-for-innovation>

⁶ See also: http://www.housinglin.org.uk/_assets/DWELL_DesigningWithDownsizers.pdf

- a. Generous Space Standards;
- b. Natural light;
- c. Avoidance of internal corridors and single aspect dwellings for light and ventilation;
- d. 'Care ready' homes to accommodate emerging technologies;
- e. Circulation that avoids institutionalisation and encourages interaction;
- f. Lively multi-purpose social spaces that link with the community;
- g. Engagement with the street;
- h. Energy efficient buildings;
- i. Adequate storage inside and outside home;
- j. Homezone design of outside spaces with pedestrian priority.

Case Study: St Bede's Extra Care. Bedford



Credit: Tim Crocker

St Bede's Extra Care is a housing scheme in Bedford designed by PRP Architects and developed by Orbit Homes. It won a 2016 RIBA East Award 2016 and a HAPPI (Housing our Ageing Population: Panel for Innovation) Project Award at the Housing Design Awards in 2011.

The development provides 104 one-bedroom and two-bedroom independent living apartments specifically designed for the over-55s, with a combination of shared ownership and social rent to ensure that the scheme is accessible to all, regardless of their budget. For customers who need it, extra care and support is available on site 24 hours a day, seven days a week.

The design solution exploits the site restrictions, working with the three retained Victorian villas, and relating the new work to both the existing properties on the site as well as the adjacent housing. Despite the amount of accommodation that had to be provided on a tight site the internal spaces are generous, clear in their layout and well-lit from the roof

lights, with both the space and natural light adding to the feeling of calmness to the communal accommodation areas.

A diverse palette of materials is used across the site with various elements complimenting each other and the neighbours. Balcony access is used in a very positive way, creating opportunities for social interaction, personalisation of external space and the opportunity of having an external front door, which is important to a number of the residents.

The scheme incorporates a number of community facilities such as a restaurant, hair salon, fitness suite and guest suite. A number of areas of the development are being taken on by the residents themselves; from the running of their own shop facility in the main entrance area to undertaking all the gardening to the communal gardens.

11. There is every indication that the housing market is failing to provide attractive options for specialist housing for older people. In particular:
 - a. 32% of homeowners over 55 have already considered moving to a smaller property in the last five years. But only 7% of homeowners actually did so. A quarter of those who considered downsizing but did not cited the lack of suitability of options for downsizing;⁷
 - b. There are shortages of the provision of housing with care: JLL recently reported "a chronic under-supply of high quality Housing with Care in the right locations".⁸
12. While pensioner poverty persists among a minority, 80% of the over 65 population will be classified as being within mid and high end affluence by 2025.⁹ The primary issue is not a lack of purchasing power among older people. Rather, the housing market appears to be failing to deliver attractive options with adequate care.
13. There is a strong business case for developers to look to build more housing for older people. This can be supported by Government initiatives and planning policy.
 - **The adequacy of current planning policy and Government initiatives in England in meeting the housing needs of older people**

Government Initiatives

14. There have been some useful Government initiatives in recent years to ensure better provision of housing for older people. They include:

⁷ http://www.legalandgeneralgroup.com/assets/portal/files/pdf_175.pdf

⁸ <http://www.jll.co.uk/united-kingdom/en-gb/research/286/retirement-living-where-is-the-opportunity>

⁹ http://www.jll.co.uk/united-kingdom/en-gb/Research/JLL_Retirement%20Living%20Report_WEB.pdf?81bda408-de40-4412-80ed-bd278c7fea10 p3

- a. Funding for specialist homes for older people through the Shared Ownership and Affordable Homes Programme;¹⁰
 - b. The 'FirstStop' service, which provides independent advice on housing and care options of older people to enable them to plan ahead.¹¹
15. It is doubtful whether these initiatives are adequate to meet the scale of need. It is also worth noting that the continuing uncertainty around funding arrangements for supported housing has the potential to undermine the ability of housing associations and other providers to provide sheltered and other forms of accommodation suitable for older people.¹²
16. There could also be an enormous potential for multigenerational housing to meet the housing needs of older people in the UK, but so far it has not got off the ground. The RIBA therefore recommends that the Government should establish a pilot scheme for a new and innovative multigenerational home. Ideas for the pilot could be generated through a design competition.

Planning Policy: Specialist Housing

17. Many local plans poorly account for the needs of older people. The RIBA therefore welcomes plans announced in the Housing White Paper to strengthen national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older people, which is something we have been calling for.¹³
18. However, the planning system's ability to respond to the needs of older people is severely hampered by the planning use class system.
- a. At the moment, the relevant planning use classes for housing for older people are C2 (institutional including Care Homes) and C3 (ordinary housing);
 - b. This fails to reflect the wide variety of housing solutions for older people, which we outlined in paragraphs 5 and 6;
 - c. As a result, inappropriate planning policies can apply. For instance, Extra Care (probably the most common form of specialised housing) is sometimes classed as C2 for planning purposes and sometimes classed as C3. This is entirely down to the individual local authority, but neither

¹⁰

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/517678/SO_and_AHP_prospectus_13_04_16.pdf

¹¹ <https://www.gov.uk/government/news/better-homes-and-bungalows-for-britains-older-people>

¹² http://s3-eu-west-1.amazonaws.com/pub.housing.org.uk/Supported_housing_consultation_-_Federation_response.pdf

¹³

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

classification is satisfactory. The GLA expects Extra Care to be classed as C3 which makes it liable for Section 106 contributions and also means that their normal housing standards apply. However, this is problematic because many standards are irrelevant (such as the very high cycle storage requirements) while others are inadequate (space standards and accessibility for example);

- d. The planning system is even more blind to innovative housing solutions for older people. For instance, it is notoriously difficult to obtain land and planning permission for co-housing schemes, which means that they can take many years, much expense, and much effort to get off the group;
- e. Without relevant use-classes, it is difficult to reference housing for older people in Local Plans, to get land specifically allocated and identify them as in housing need assessments.

19. The RIBA therefore recommends that a distinct, clear planning use class (or classes) should be introduced for housing for older people that is designed to Housing our Ageing Population: Panel for Innovation (HAPPI) principles (see paragraph 7). This would enable local authorities to develop appropriate policies for specialist housing for older people.

Planning Policy: Mainstream Housing

20. The Government plans to strengthen national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs such as older and disabled people. But local planning authorities' ability to act is hampered in the sphere of mainstream housing.

21. The policies which enable local planning authorities to adopt the higher requirements, M4(2) and M4(3), are far too cumbersome and demanding. As it stands, every local planning authority has to prove need and viability before requiring any new dwellings to meet M4(2) or M4(3). Guidance in the National Planning Policy Framework is vague and places undue emphasis on proving viability.

22. London has been able to demonstrate need and viability for new housing to be 90% M4(2) and 10% M4(3) despite having the youngest population in the country. It is questionable whether London's policy is proportionate. However, as the planning inspector for the EiP determined it is reasonable, it seems unnecessary that other local planning authorities must go through an extensive process to prove the need and viability of accessible housing requirements which may be far lower.

23. The RIBA believes that it should be sufficient to determine a need (determined by

demographic analysis) to be met over a reasonable period for local authorities to adopt accessibility requirements. The Government should define what a reasonable period is (for instance, 20 years) to ensure consistency in the way that the trajectory is set.

24. As noted above, it is good practice for local authorities to set up and maintain an Accessible Housing Register. However, few local authorities actually do.¹⁴ Moreover, those that do use different categories and criteria for accessibility.
25. The RIBA recommends that maintaining an Affordable Housing Register become a legal duty, and that the register must conform to a nationally defined set of classifications which are based on the new optional requirements for accessibility in Part M of the Building Regulations.
26. It would also be highly useful if housing that meets Building Regulation requirements M4(2) and M4(3) were more generally identifiable in the market. To this end, we recommend that the Government ensure this information is available through sales and marketing literature, and lettings details, as well as local accessible housing registers.
27. The RIBA also believes that the Nationally Described Space Standards should be incorporated into the building regulations as compulsory requirements. Since adequate space is required to meet Building Regulation requirements M4(2) and M4(3), these are mutually reinforcing policies.
 - **Whether more housing designed specifically for older people could help address England's wider housing needs**
 - **The availability of finance to help older people 'right size' in retirement, and the impact of the cap on Housing Benefit from April 2017 on the development of specialist housing**
28. Many older people under occupy large homes which may be suitable for families. A successful housing market would provide older people with opportunities to move to a housing that suits their needs in later life. This would also release homes suitable for families.
29. There is a clear appetite among some older people to move into smaller housing. 25% of homeowners over 55 who have considered moving to a smaller property in the last five years have not been able to do so. Of these, one fifth cited stamp duty as the reason why.¹⁵ The RIBA therefore recommends that the removal of stamp duty when moving to a smaller home should be piloted.

¹⁴ <https://www.leonardcheshire.org/sites/default/files/no-place-like-home-leonard-cheshire-disability.pdf>

¹⁵ http://www.legalandgeneralgroup.com/assets/portal/files/pdf_175.pdf

- **The extent to which improving specialist housing provision in England could improve people’s health and wellbeing, and deliver savings in public expenditure**

30. The RIBA has collated a vast amount of existing knowledge – from architects, other built environment professionals, academics and other researchers – about housing design for older people and its impact on health and wellbeing.¹⁶

31. Better provision of specialist housing could improve people’s health and wellbeing, and deliver savings in public expenditure. For example:

- a. Longitudinal research found that the rate of falls per year for older people in extra care housing was 31%, whilst the fall rate in a matched sample drawn from the wider community was 49%;¹⁷
- b. The same study also found that residence in extra care housing is associated with a lower level of hospitalisation. Older people in extra care aged 80+ spent 5 nights per year in year hospital on average, in comparison to 6 nights per year for a matched sample drawn from the wider community. The financial impact of a lower incidence of hospitalisation show that the savings in terms of hospital beds could reach up to £512 per person.¹⁸

32. It is also important that homes for older people are well designed. It must be remembered that people over the age of 65 years spend more than 80% of their time in their homes, and those aged over 85 years spend more than 90% of time in their homes.¹⁹ Everything we know about the importance of home design (including space, light and accessibility) for wellbeing is therefore especially important for older people.

33. A study on the relationship between building design and residents' quality of life in extra care housing schemes found that there was great variation in terms of how schemes performed on the basis of their design.²⁰ The results suggested that

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<https://www.architecture.com/RIBA/Professionalsupport/Researchandinnovation/Projects/DesignforanAgeingPopulation2014.aspx>

¹⁷ [http://www.cpa.org.uk/cpa-lga-evidence/ExtraCare_Charitable_Trust/Kneale,ULC-UK\(2011\)-EstablishingtheextrainExtraCare.pdf](http://www.cpa.org.uk/cpa-lga-evidence/ExtraCare_Charitable_Trust/Kneale,ULC-UK(2011)-EstablishingtheextrainExtraCare.pdf)

¹⁸ [http://www.cpa.org.uk/cpa-lga-evidence/ExtraCare_Charitable_Trust/Kneale,ULC-UK\(2011\)-EstablishingtheextrainExtraCare.pdf](http://www.cpa.org.uk/cpa-lga-evidence/ExtraCare_Charitable_Trust/Kneale,ULC-UK(2011)-EstablishingtheextrainExtraCare.pdf)

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https://www.researchgate.net/publication/235715948_The_relationship_between_building_design_and_residents'_quality_of_life_in_extra_care_housing_schemes

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https://www.researchgate.net/publication/235715948_The_relationship_between_building_design_and_residents'_quality_of_life_in_extra_care_housing_schemes

designers of extra care housing should strive to build in features that support frail older users in such a way that an institutional atmosphere is not created, and that signifiers of 'old age' and frailty are kept to a minimum, in order to support wellbeing.