

Consultation Response

Proposed reforms to the National Planning Policy Framework and other changes to the planning system

Ministry of Housing Communities and Local Government

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About this consultation

This consultation seeks views on the Government's proposed approach to revising the National Planning Policy Framework.

Key points and recommendations

Age UK hopes that revisions to the National Planning Policy Framework (NPPF) will transform the way plans are developed and planning decisions made so that new build really addresses the huge shortage of housing for an ageing population. We welcome many of the changes proposed. In particular:

- Recognition in the draft Design and Placemaking Planning Practice Guidance that the majority of older people will age in mainstream housing. In the past, local plans have focused on specialist housing with care for the “older old” and not properly addressed over 90% of older people who live – and will continue to live – in general mainstream housing.
- The separation of older and disabled people into two distinct categories. The needs of a young child living with a disability are very different to the needs of an ageing population.
- A proposal to provide new guidance on housing for older people. Current guidance is not resulting in the kind of granular analysis of different older demographic groups required and new guidance is essential.
- The allocation of sites for specialist older people's housing.
- The emphasis on community infrastructure, green spaces, genuinely walkable amenities, healthy, safe integrated communities and reducing isolation. These elements are important for all age groups but particularly for older people who are likely to spend more time in their homes and immediate surroundings.

However, we were disappointed to see the proposal that only 40% of new homes have to be built to Part M4 Category 2. Setting such a low baseline will reduce the targets people are inclined to set, reverse momentum towards higher standards and it does not simplify planning or remove the structural incentive for developers to lower standards in order to compete.

There is a danger that reversing plans to mandate category 2 in the context of disappointing housing starts will have a negligible impact on viability but a substantial effect on other costs such as funding for the Disabled Facilities Grant, temporary accommodation, hospital discharge, housing benefit, social care, the NHS and local authority funding.

Accessibility is important – not just for helping older people to live independently but also because it increases the number of housing options older people have and so their ability to find a home that is affordable, in good condition and near to support networks. Health, poverty and the accessibility of our housing stock are interconnected.

We would also like to see changes to the wording in some areas to ensure that needs assessments are detailed and based on an accurate understanding of how older people move home and the kinds of homes they therefore need.

We would like to see the following changes to the proposed framework.

- An explicit reference to planning for the needs of an ageing population.
- Greater emphasis on health infrastructure (doctors/hospitals /health-hubs/pharmacies/social services).
- Revised guidance on assessing need for older people's housing.
- Part M4 Category 2 as the mandatory baseline for all new build.
- Allowing for the inclusion of wider age friendly features, which go beyond simple accessibility. such as elements of the HAPPI principles, dementia design and care-ready design.

These additions should be achievable and would ensure that the many positive elements of this revised NPPF really feed through into what is required in new build for an ageing population.

About Age UK

Age UK believes every older person should be included and valued. We're working locally, nationally and internationally to change the way we age. Together with our partners, we're changing the day-to-day experience of getting older through essential services and local support. In the UK, the charity helps more than seven million older people each year by providing advice and support, including through our national advice line and our friendship services. It also researches and campaigns on the issues that matter most to older people, aiming to put older people at the heart of public policy and shift the way ageing is treated and represented.

Introduction

Through our advice line and network of local Age UKs, we frequently hear from older people struggling with aspects of their housing. Those trying to move to somewhere better suited to ageing find a shortage of workable options. The comments below come from a discussion with Age UK staff working with older people across the country:

Yesterday I went to see a lady in a 7th floor flat. The lift only goes to the 5th floor and so she can't leave. She only goes out to go to the hospital, and the ambulance men carry her down.

The caller and her husband have lived in a privately rented home for 11 years. The landlord told them that he was planning to sell last year, and they have been looking for somewhere to move to since. The date of their eviction is approaching. They have completed a homelessness application with their local authority and have been bidding on properties but without success.

A caller's mother-in-law has been in hospital for two months. Her home is not suitable to return to, so she has been trying to find supported accommodation. There is nothing that is likely to be available for some weeks, so she has been placed in temporary accommodation. The temporary accommodation is not suitable or safe, and she cannot get in or out without support as it is not possible to open the door while using her walking frame. The caller had contacted the housing team who have told her that this is the only option available.

There are options but often they are not suitable. Bungalows with ice on the inside of the building. Old, poor-quality stock. Homes at the top of steep hills. We have a lovely range of private extra care housing, but it is extraordinarily expensive, and even if you can buy or rent, the service charges are huge. People move in and find they run out of money.

In a survey of Information and Advice managers working in local Age UKs across the country, 92% said they came across older people living in unsuitable housing often, a quarter very often. 95% said it was difficult for older people to find suitable housing which they could afford, 35% very difficult.

In 2025 Age UK commissioned nationally representative polling which supported this anecdotal evidence. The figures show a substantial proportion of older people concerned about ageing in their homes with renters, lower income groups, women, carers and ethnic minority respondents disproportionately concerned. Amongst private renters over the age of 75, for example, 50% say they are worried about affording their home as they age, 47% worried about its accessibility and 26% about its condition.

With households headed by someone over the age of 65 forecast to account for 84% of household growth between 2018 and 2043 it is essential that changes to the National Planning Policy Framework deliver the right kind of homes for an ageing population.

The Government's target of building 1.5 million new homes may represent just over 5% of the English housing stock but it is, for example, 34% of the number of homes that currently have step free access. New build is likely to be more energy efficient, if properly built in

good condition and easier to maintain. It ticks many of the boxes for an older mover. It could make a significant difference to the housing choices older people have.

Consultation Questions

Question 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.

We agree with the separation of plan making and decision-making policies and hope it will mean that the needs of older people are addressed more consistently in all areas of the country. However, it obviously gives nationally set plan making policies greater influence and limits the ability of local authorities to stipulate design and other features where they are not set out at a national level. It is essential therefore that the nationally set plan making policies properly address the needs of an ageing population. We have therefore proposed a number of changes to the NPPF framework through this consultation response. Including:

- Explicit reference to planning for the needs of an ageing population.
- Greater emphasis on health infrastructure (doctors/hospitals /health-hubs/pharmacies/social services).
- Part M4 Category 2 as the mandatory baseline for all new build.
- Including wider age friendly features, which go beyond simple accessibility. such as elements of the HAPPI principles, dementia design and care-ready design where appropriate.
- Revised guidance on assessing need for older people's housing.

These additions should be achievable and would ensure that the many positive elements of this revised NPPF really feed through into what is required in new build for an ageing population.

Question 4: 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.

Partly agree.

We would like to see an explicit reference in PM1 to planning for the needs of an ageing population. Spatial strategies must consider health infrastructure, for example, and this is not referenced.

Households headed by someone over the age of 65 are forecast to account for 84% of household growth between 2018 and 2043. Current planning does not begin to recognise the scale of this challenge – or the opportunity it offers. There is much in the draft NPPF and draft Design and Placemaking Planning Practice Guidance which addresses what an

older person might need, and we welcome the references to community, genuinely walkable amenities, adaptation, accessibility, site allocation for specialist provision and much else. However, the needs of an ageing population must be set out explicitly as a distinct issue to make sure it gets appropriate priority.

Question 5: 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.

Most current plans do not properly address the needs of an ageing population. Where older people are considered, it is often confined to housing for the “older old”. The fact that over 90% of older people live in general mainstream housing is not properly taken into account. The new NPPF and accompanying documents do much to address this and could transform the way older people’s housing is considered, substantially increasing the number of suitable housing options older people have.

However, properly evaluating older people’s housing need will require a change in mind set and this will take time to feed through into local plans. One local authority Age UK spoke to told us that they did not want to build age friendly mainstream housing because their aim was for older people to move out of mainstream housing into specialist housing as they aged. The reality is that older people tend to want to move in their 50s, 60s and 70s, when they have the energy to do so and when a mainstream option is more likely to appeal.

Nationally representative polling conducted for Age UK’s 2025 report, “Late Movers” showed that many more people move home between the ages of 50 and 75 than often assumed but after the age of 75 moving is considered difficult.ⁱ

- Just under half (47%) of those aged 66 to 74 have moved since the age of 50.
- 72% of all respondents over the age of 65 thought it would be difficult to move over the age of 75; and of those 30%, thought it would be very difficult and something they could not manage - even with help.
- Previous polling has shown that 70% of over 55-year-olds say that a strong motivation behind considering a move is wanting a home better designed to meet their needs as they age.

What an ageing population really needs is mainstream, accessible housing in all tenures and for different income groups which appeals to those in their 50s, 60s. and 70s so that they can find the homes they are looking for.

These trends and others (such as the growth in older renters) are widely misunderstood and changing this mindset will take time. The new NPPF can help to achieve change, but some local plans will be developed which don’t adequately address what is required. So, changes within five years will allow more accurate assumptions to feed through to plan making in time.

Question 7: 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.

Partly agree.

Again, as above the need to address an ageing population has to be explicitly referenced to ensure that a new generation of plans takes into account the types of homes and the infrastructure that will be required.

Older people often express a preference for new build. It should offer the good condition, easy to maintain, energy efficient, community-based housing that they typically want.

Question 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.

Preventing duplication of standards will help to make plans simpler, more consistent across different areas and processes more efficient. However, as set out in our answer to question 2, limiting the ability and importantly the inclination (given the general way in which local plans will be assumed to default to national standards) of local authorities to set their own standards on specific issues, makes it very important that the national policies they have to implement, fully reflect what an ageing population needs.

Question 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.*

Partly agree.

The list of bodies to cooperate with should include ICBs and health and social care partners. The interaction of housing and health is well documented and the shortage of suitable housing for an ageing population impacts on NHS, social care and unpaid carers. Health partners should be part of the process for deciding about both the quantity, type and location of housing for an ageing population.

We have heard anecdotal stories of health boards pushing back against planning for older people's housing on the grounds that it might draw older people into an area and increase pressure on local health systems. The 2021/22 National Housing survey showed only 21% of owner occupiers over the age of 65 chose to move somewhere more than 50 miles from their previous home. Most moves are within a relatively small area so cross border collaboration between neighbouring authorities is important.

We do need a national system that allows older people to move to be near family and friends and to live in homes that help them retain their independence. Analysis of cases coming into the Age UK Information and Advice line shows younger family members struggling to find suitable accommodation for older family members near to where they live.

Question 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.*

Partly Disagree.

We think that Part M4 Category 2 should be mandatory for all new build so that the reference to it here would not be needed.

We are also concerned about the restriction on stipulating the internal layout of a building.

“Not cover matters relating to the construction or internal layout of buildings unless they are to implement the nationally described space standard”.

The internal layout of a building is very important for older people and internal features can make the difference between someone being able to live well and independently or having to move into residential care. The only reference to age friendly internal layout in the NPPF is to Part M4 Category 2 and accessibility. There is no reference to wider age friendly features. So if a local authority wanted to plan general mainstream homes which would appeal to all ages but would be suitable for the substantial number of people aged between 50 and 75 who are moving to find a better place to age, they would find it difficult to stipulate certain features, other than those set out in Part M4 Category 2. They would not be able, for example, to require a developer to include an age friendly kitchen design or storage space. Where to put walkers and wheelchairs is a common issue and in blocks of flats can cause trouble with neighbours and fire safety.

The explanation of the proposed reforms states that market operators are best placed to identify what these internal features are. However, demand led design does not work for the older people's housing sector.

There is a distinction between what older people “need” if they become less mobile and what they “want” as purchasers in a market. People are only aware of the importance of the layout of a kitchen or bathroom when they need it. One FTSE housebuilder we spoke to developed several flats within a project with age friendly features but found them hard to sell. Older people were actually buying the other flats without these features in the same block. Older people who tend to be moving when still healthy do not consider themselves “old” and often don't respond to “older people's” marketing. Age friendly features do not have to cost more to incorporate and can make a big difference to an older person's life, but developers are unlikely to include them, and buyers are unlikely to ask for them. Future proofing for older people's housing has to be done through regulation not market demand.

We need to see an exception to this rule for older people's housing, and it needs to be clearly set out so that local authorities do not default to no guidance on internal layout.

Question 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.*

Partly agree.

Age UK welcomes the separation of older and disabled people into two separate categories. The needs of a family with a disabled child are very different to the needs of an ageing population and this is something we have been calling for.

We would like to see a reference to “general mainstream housing” included in the list of options for older people.

The current wording is: *“Older people (including those who require retirement housing, housing-with-care and care homes)”*.

Local plans tend to address specialist options at the moment but as mentioned above, do not address the over 90% of older people who live – and want to continue to live - in general mainstream homes. As mentioned in our answer to Question 5 properly evaluating need requires a change in mindset and better understanding of the age at which older people move and the kinds of home they therefore need. The NPPF must emphasise general mainstream housing so that it is not ignored.

We would like to see the wording amended to read, “Older people (including those who require *general mainstream housing*, retirement housing, housing-with-care and care homes)”.

This needs to be supported by revised guidance, as set out in our answer to question 49, so that evaluation is more granular and all tenures and types of older people’s housing are properly assessed.

Question 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.

Age UK is pleased to see this question included in the consultation. Revised guidance on older people’s housing is key to ensuring that the many positive changes in this draft NPPF actually feed through to build.

a) If so, what elements should this guidance cover?

1. Background information about housing and an ageing population to ensure that the assumptions underlying assessment of need are accurate. This should include details of how and when older people move and the kinds of homes they therefore need, addressing areas where there are common misunderstandings. It should include the following:

- Over 90% of older people live in general mainstream homes and the vast majority will continue to do so. Only 12% of homes currently have step free access and there is an extreme shortage of suitable mainstream housing for older people.
- Specialist housing is also in short supply, particularly in some geographic areas and for lower income groups. We need to encourage the welcome innovation we see in

this sector helping to provide fuller, more independent lives for older people and making moves into this kind of living environment a positive choice.

- Fewer older people move each year than younger cohorts but over time these smaller numbers moving accumulate so that around half of those aged 75 have moved since they were 50. 70% are looking for somewhere better to age. New build must address this demographic. It offers a considerable opportunity to help a large proportion of older people into homes that will help them to age well.
- More move over the age of 75 but as they age people become more inclined to stay in their existing home. In 2025 polling 72% of all respondents over the age of 65 thought it would be difficult to move over the age of 75; and of those 30%, thought it would be very difficult and something they could not manage - even with help. People will age in homes they move to when younger.
- With people largely moving between the ages of 50 and 75, they are looking for homes that reflect that stage of their life. Some will be working, still feel responsibility for adult children or for grandchildren and older people tend to value a spare bedroom. A spare bedroom can be really important for a couple to sleep separately if one is unwell, for a carer or to have friends and family to stay. 80% of older people already live in homes with three bedrooms or less and only a third of movers downsize. A third move somewhere the same size and a third somewhere bigger. The right home for later life is more about configuration than size.
- The number of people ageing in the private rented sector is predicted to more than triple over the next twenty years with 17% of older people forecast to live in privately rented homes by 2042. Together with social renters, this will mean 36% of older people will be renting, as against 21% in 2022.
- Over 50% of renters aged between 45 and 64 have no savings. There is a cohort entering retirement who may not be able to afford their current rent in retirement. This group need options. The Pensions Policy Institute estimates that if current trends continue the cost of housing benefit for older renters will increase by 40%, an additional £2bn pa.
- Spreading older people's options across geographic areas is important so that older people can move near to friends and family providing support. It is worth considering the role good housing has in supporting unpaid care. It is much easier to help a parent who lives close by and can do most daily tasks independently. Where carers have to travel too far or help an older person get to a shop or upstairs without a stair lift the pressure can prove too great. An older person is much more likely to need social care or to move into some kind of supported housing. The structure that unpaid carers provide is fragile. It is often minor issues which prove the "straw that breaks the camel's back" and where carers cannot cope the cost to local authority provision rises. The value of unpaid care is estimated at £162bn pa.

- There is a huge current shortage of suitable housing for older people of all types and in all tenures. Needs assessments must address this shortage not just add a percentage increase in line with the ageing population to existing provision.

2. Links to data sets allowing local authorities to see how these trends affect their local area. The easier the process of collating evidence and more detailed the help available through the guidance the more likely that analysis of need will be comprehensive.

3. Links to tools allowing local authorities to map their health and other ageing infrastructure. Identifying walkable communities must take into account practical detail such as gradient, safety and accessibility so that a ten-minute walk is actually possible for an older person.

4. Guidance on site allocation for specialist older people's housing and the kinds of sites that would be suitable.

5. Guidance on assessing need for Part M4 Category 3 (wheelchair accessible) homes and links to datasets supporting analysis. Assessment should be based on identifiable need not arbitrary percentages. Part M4 Category 2 should be mandatory.

6. The 5-point typology proposed by the Older People's Housing Taskforce as reference to ensure that all housing types are addressed.

- Mainstream Homes/Housing: (New build M4(2)/M4(3) and adaptations).
- Community-Led Homes/Housing: (e.g. Co-housing, Shared Lives).
- Service-Led Homes/Housing with Support: (e.g. Sheltered/Retirement Living).
- Service-Led Homes/Housing with Care: (e.g. Extra Care/Integrated Retirement Communities).
- Care Homes.

7. Guidance on how to identify the proportion of these different typologies needed in each tenure and for different income groups. Links to datasets which help to achieve this.

8. Guidance must also ensure that local planners identify the role that alms houses and other charitable bodies can play in providing affordable older people's housing. The guidance needs to make sure that delivery strategies and requirement figures do not unintentionally exclude models that fall outside standard developer led routes.

Age UK would welcome the opportunity to help with drafting new guidance.

Question 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 agree.

The requirements need to explicitly reference an ageing population. There is a reference to blue badge holders and welcome references to specialist housing for older people, also further references in the linked transport policies. However, an ageing population has real impact on transport and other needs, and this should be spelt out.

Some older people will stop driving and become more reliant on accessible transport, but others will find even accessible transport difficult. Where mobility and strength reduce, carrying shopping bags on buses is a real challenge. People need genuinely walkable amenities. Older people are likely to be interested in the housing provided by new large-scale developments and the large number moving in their 50s. 60s and 70s may move at a time when driving and the transport available seems sufficient. Many of this group will age in place though and then find they are dependent on others to help with shopping.

The framework should address the phasing of development so that residents do not have to wait for the last phases for an area to feel like a community. Health and other infrastructure should be central and built early; older people's housing mixed across all housing types and tenures and incorporated in all phases of developments. We must avoid older groups being segregated into separate areas, specialist housing on the edge of towns so that communities are mixed at all phases and not just collectively at the end of many years of building.

The NPPF should therefore include more guidance on phasing, integrating older people's housing into all types and tenures (particularly important if the decision to only build to a baseline of 40% Category 2 goes ahead) and an explicit reference to an ageing population.

Question 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.

Partly agree.

Age UK agrees with the requirement to ask authorities to set out the proportion of homes that should be delivered to Part M4 Category 3. We think that Part M4 Category 2 should be mandatory across all new build in which case there would be no need to set out this category as a separate item.

If 40% remains as the Category 2 baseline, then it is essential that authorities are required to set out the proportion of homes to be delivered to both Category 2 and Category 3.

Local authorities should also record the number and type of homes that meet these standards so that we can see whether having a target baseline achieves what is intended.

Question 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. a) Please provide your reasons, and would you support an alternative minimum percentage requirement

Strongly disagree.

The 40% baseline for Part M4 Category 2 may seem like a suitable compromise but will not achieve what is required and in some cases may reduce the target a local authority sets for accessibility.

- **The psychology of setting out such a low baseline is likely to have some positive, but also some negative impacts.**

Habinteg's analysis of current local plans shows that 103 out of 311 have no reference to Part M4 Category 2. Of those that do have a reference, 148 refer to both market and affordable homes and the average target is for 75% to be delivered to Category 2. The rest split delivery between market and affordable with the average target being 66% for market homes and 80% for affordable homes.

In the 103 areas where there is currently no reference, one would hope that the draft proposals would ensure that their target for new build would be set at or above the 40% minimum. However, where targets are set, they average between 66% and 80% considerably above 40%.

By stating the 40% figure it may be that people's inclination to higher numbers is actually reduced. The first number mentioned in a decision-making process has considerable impact as a benchmark. It is why the opening bid in a negotiation plays such an important role.

Part M4 Category 2 is explicitly excluded from the default assumption to national standards on the basis of being only a baseline. However, the climate of the NPPF is that any deviation from a national standard is exceptional and this backdrop is likely to have some impact.

There is a danger that having a baseline of 40% reduces ambition in some areas and also legitimises any under delivery. In those areas where there are higher targets, we know that the number of homes actually built to Category 2 tends to be lower.

- **It upsets the momentum towards full implementation of Category 2.**

The sense that the Government was moving towards mandatory Part M4 Category 2 has played a key part in the progress we have seen over the last few years as more plans set higher targets for Part M4 Category 2. Moving away from the mandatory 100% target removes this incentive.

The key message to come from the 2022 consultation on Part M4 Category 2 was that all parties wanted a level playing field. This would remove the structural pressure to reduce standards. The compromise of 40% doesn't remove this fundamental driver.

- **It doesn't go far enough to address the current shortage of accessible housing.**

Polling conducted for Age UK in 2025 showed the extreme shortage of accessible housing for older people. 44% of those over the age of 50 are worried about the accessibility of their home. Around half of 75-year-olds have moved home since the age of 50, 70% looking for a better home to age in, but the number over the age of 75 who are concerned

is not much lower (40%). Movers are not managing to find the kind of accessible homes they need.

New build has the potential to substantially increase the number of suitable options older people have. Not all older people need step free access but looking at this single measure illustrates the effect. Only 12% of homes currently have step free access. The Government's target of building 1.5 million new homes may represent just over 5% of the English housing stock but it is 36% of the number of homes with step free access. If all new build had step free access this would increase the number of options by a third.

- **More accessible homes are needed to help address issues people have with other aspects of housing including condition, security, affordability and location.**

Poverty, health and accessibility are all connected. If the only ground floor flat is in poor condition, above budget or far from family and support networks an older person may have to compromise. These compromises play out over time eating into savings, creating poverty, loneliness, isolation and poor health. The impact of the shortage of accessible housing goes beyond mobility within the home environment.

- **The sums involved are minimal and have to be seen outside of the context of viability.**

The debate around Part M4 Category 2 has been caught up in a wider discussion about viability. There are real issues around the cost of building, the viability of developments and the urgent need for additional numbers of homes. These need to be taken seriously. It is also important to recognise the accumulative effect of regulation and obligation on development.

However, it is easy to get caught up in this immediate debate and lose sight of the numbers involved.

The additional cost of mandating Part M4 Category 2 for all new build is estimated to be £265m pa. (However, discussions we have had with small and large developers suggest that in many cases the cost is less in practice than in theory and often negligible. Changes to design can negate the additional land costs and additional material and build costs are absorbed in wider work. The £265m also includes one off transition costs which will fall away in time. It is, however, based on 2019 figures).

With 40% mandated some of this £265m is already committed so we are effectively looking at a proportion of this figure as the additional cost of mandating the full 100%. This sum needs to be seen in the context of the DFG, health and social care funding, the cost of housing benefit, temporary accommodation, hospital discharge, pressure on unpaid care, not just viability.

The proportion of £265m required seems small against some of the figures mentioned in our response to this consultation – the Pension Policy Institute's estimate of a £2bn pa increase in housing benefit for older people; the £39bn affordable housing programme

and the extent to which additional funding comes via contributions from developers through Section 106; the £162bn estimated cost of unpaid care.

There is a danger that we make easy small savings, sums which don't address the real viability leavers such as Section 106 contributions and the more expensive elements of regulation, and in doing so we store up significant additional expenditure in the future.

If the 40% target does go ahead, we would like to see:

- The 40% as an annual baseline, rather than a baseline for the total time period of the local plan. Annual targets are required to avoid end loading the obligation. This would also tie outcomes to the tenure of decision makers providing greater accountability.
- Substantial rewriting of the current guidance on assessing housing need for older people so that planners understand the importance of accessible and adaptable mainstream housing when they set targets. (Details in our answer to question 49). We welcome the stated recognition in the Design & Placemaking Planning Practice Guidance that the majority of older people live in general mainstream housing, but many people do not understand this. When considering older people's housing they think of the "older old" and specialist provision. So, there is a tendency to underestimate the importance of Part M4 Category 2.
- The 40% as a baseline for all developments - across all tenures, all types of home, all geographic areas and homes built for all income levels. Otherwise, there is a danger that the 40% target is filled by a few developments and homes in one category where it is easier to achieve the numbers. It may be that all affordable homes are built to Category 2 and fill the 40% target leaving insufficient market homes for an ageing population. In other areas, it may be that larger market homes for higher income groups can easily meet the Category 2 benchmark, but smaller affordable homes cannot – and aren't required to because the target has already been met.
- The number of homes actually built to both Category 2 and Category 3 are recorded. Historical outcomes suggest that numbers built tend to be below the target set. Records are needed to make sure that the baseline is enforced.

Question 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.

We welcome the requirement to provide sites for specialist older people's housing.

Question 72: Do you agree the 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.*

Strongly agree.

We welcome the additional criteria with regard to the location of specialist housing for older people so that older people can access community infrastructure by walking or using mobility aids.

Question 148: Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

Age UK welcomes the principles set out in DP3 and the draft Design and Placemaking Planning Practice Guidance. Community, a healthy environment, safe accessible access to green and other infrastructure and walkable amenities are important for all ages but essential for older people who tend to spend more time in the area immediately surrounding their home.

We were particularly pleased to see recognition that the “majority of older people live in mainstream housing, which should be accessible and adaptable to meet their needs, enabling safe and independent living”; also, the separation of older and disabled people into two separate categories.

The needs of older people are implied in much of what is written but we would like to see an explicit reference in both the NPPF and Design and Placemaking Planning Practice Guidance to considering an ageing population.

As discussed in our answer to previous questions local plans do not begin to evaluate what is needed at the moment and we need a change in mindset. Spelling out the extent of the changes that are taking place and what is required is important.

We would also like to see a National Model Design code for an ageing population incorporating the features set out in the HAPPI principles, dementia ready and care ready design to guide decision making. Many of the features needed do not cost any more to include but accumulatively change the environment for an older person making independent living much easier. Plan makers should be signposted to this through the NPPF and Design and Placemaking Planning Practice guidance.

ⁱ <https://www.ageuk.org.uk/siteassets/documents/reports-and-publications/reports-and-briefings/safe-at-home/late-movers-how-the-shortage-of-suitable-housing-affects-our-ageing-population-october-2025..pdf>