



**Communities Scrutiny Group & Growth and Development
Scrutiny Group**

Thursday, 17 October 2024

Rushcliffe
Borough Council

Accessible Housing

Report of the Director - Neighbourhoods

1. Purpose of report

- 1.1. The report provides an overview of the current approach, challenges and recommendations for the provision of accessible housing to support individuals with disabilities.

2. Recommendation

It is RECOMMENDED that:

- a) the Communities Scrutiny Group & Growth and Development Scrutiny Group scrutinises the information provided by officers to enhance the provision of accessible housing; and
- b) explores actions that the Council can take to meet the housing needs of residents with disabilities.

3. Reasons for Recommendation

- 3.1. Accessible housing is essential for fostering inclusive communities and ensuring individuals can live with dignity and independence. Prioritising accessible housing on new developments and the adaptation of existing homes will enable the Council to promote social equity and enhance the quality of life for everyone.
- 3.2. With an ageing population and growing demand for adaptations, the role of district councils to promote a more accessible housing sector is crucial to improving public health and easing the strain on health and social care systems.

4. Supporting Information

- 4.1. Accessible housing crosses the boundaries between housing, health and social care. A system wide approach to support disabled and older people to be independent through the provision of a range of services and accommodation, will be a vital component in meeting future needs and overcoming the barriers to delivery.

5. Housing Needs

- 5.1. As planning authorities, district and borough councils prepare housing need assessments to inform their Local Plans. Paragraph 50 of the National Planning Policy Framework requires that local planning authorities plan for a mix of housing based on the needs of different groups in the community and identify the size, type tenure and range of housing that is required in particular locations. **Appendix 1** sets out some of the key indicators of need to inform the provision of accessible housing locally.
- 5.2. Nottinghamshire County Council plays an important part of the housing system in Nottinghamshire, coordinating, commissioning, and market shaping activity to ensure housing is available for vulnerable people and those with care and support needs to reduce health inequalities, support independent living and a better quality of life. The Nottinghamshire County Council's Housing Strategy 2024-2029 identifies 'enabling people to live independently' as a strategic goal and commits to working with Borough and District Councils to achieve the following actions:
- *In collaboration with our local housing authority colleagues to ensure delivery of a seamless, person-centred support, equipment and adaptations service to those with mobility needs who need them*
 - *To ensure timely adaptations delivery to facilitate people being safely discharged from hospital and also to use adaptations as a preventative intervention to support carers, prevent falls, reduce loneliness and avoid moves into residential or nursing care*
 - *Advocate for the highest proportion of homes to be built to Lifetime Homes (LTH) standards within new housing areas to provide flexible and adaptable homes*
 - *Advocate for the supply of new family sized homes suitable for children and young people with disabilities.'*
- 5.3. There is a general lack of suitable, affordable housing for those who need it in many parts of Nottinghamshire. Given the prominence of housing in the Health and Wellbeing Strategy and other key strategic and policy frameworks including wider Integrated Care Systems, it is envisaged that collaborative approaches will continue to develop which will assist with the overall housing provision.

6. Building New Accessible Homes

- 6.1. Paragraph 135 subsection (f) of the National Planning Policy Framework states that planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. A footnote to this paragraph states that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.

- 6.2. The optional technical standards set out in the building regulations can be applied through the setting of policies within a council's local plan where it can be justified by evidence and where, when considered alongside other policy requirements, does not make the delivery of development unviable. The optional standards are as follows:
- Category 2: Accessible and adaptable dwellings M4(2)
 - Category 3: Wheelchair user dwellings M4(3), of which there are two standards: adaptable M4(3)(a) and accessible M4(3)(b). The difference between the two categories is that 'adaptable dwellings' are to be constructed to be adjustable for occupation by a wheelchair user, whereas 'accessible dwellings' should be constructed for immediate occupation.
- 6.3. The present local plan comprises of Local Plan Part 1, Rushcliffe Core Strategy (LP1), adopted December 2014, and Local Plan Part 2, Land and Planning Policies, adopted October 2019. Present planning policy on adaptable dwellings is contained within Policy 12, Housing Standards of LP2. This requires that subject to viability, 1% of new dwellings on sites of over 100 dwellings should comply with the M4(3)(a) standard.
- 6.4. The policy requirement does not distinguish between whether the units should be either market or affordable housing, either would be acceptable in principle on this basis. However, Strategic Housing do request that the accessible dwelling should form part of the affordable housing mix. Any accessible housing requirement should be secured through a condition on a planning permission.
- 6.5. The majority of homes on sites that are allocated within both parts of the Local Plan secured planning permission prior to the adoption of LP2 in October 2019, therefore the requirement for M4(3)(a) was not secured via condition. Planning applications on qualifying sites are now conditioned to secure the required units. Despite this, the Borough Council has successfully secured provision of wheelchair adaptable or accessible units as part of the affordable housing scheme on reserved matters applications. To date, 9 accessible units have been completed, with a further 2 in the pipeline. In addition, a further 5 adaptable units have been secured, of which 2 have been built.
- 6.6. In relation to the emerging Greater Nottingham Strategic Plan (which is being produced jointly by Broxtowe Borough Council, Gedling Borough Council, Nottingham City Council and Rushcliffe Borough Council), and based upon the evidence contained within the housing needs study (extract contained within **Appendix 1** of this report) the draft policy on housing mix requires that all new dwellings should meet at least the M4(2) standard of accessibility. Should this policy pass independent examination by a Planning Inspector, and be adopted by the Council, then this will replace the LP1 and be the Council's planning policy. Such a requirement would be secured by condition. The 1% requirement for M4(3)(a) provision on sites of 100 dwellings or more would also remain in force.
- 6.7. One of the main considerations at the Strategic Plan's examination is whether any policy costs, including for accessible dwellings are viable. Viability work

undertaken in support of the Strategic Plan indicate that alongside the provision of 30% affordable housing across the Borough on qualifying sites, and assumptions made in relation to other policy costs (such as improvements to schools, health facilities, etc.), it is viable for all dwellings to meet the additional costs associated with the M4(2) standard. With respect to potentially increasing the proportion of M4(3) dwellings sought, this will be considered in subsequent updates of the Local Plan.

7. Adaptation of Existing Homes

- 7.1. There are a range of services to help individuals with disabilities to remain in their existing accommodation:

Integrated Community Equipment Service (ICES)

- 7.2. The ICES service is funded through joint health and social care budget. This provides reablement services to meet the short-term needs of people coming out of hospital through the provision of equipment and minor adaptations.
- 7.3. The community Occupational Therapists (OTs) rely on both ICES and Disabled Facilities Grant (DFG) funding, as most disabled people needing their home adapting require a range of services including equipment, such as specialist beds, perching stools, or walking aids (ICES budget); minor adaptations such as grab rails or stair rails (ICES or part of DFG budget); alongside more major works, such as showers and stairlifts (DFG budget).

Handy Persons Adaptation Scheme (HPAS)

- 7.4. HPAS provides help and support to individuals over 60, or who have a disability, to undertake small practical jobs and essential adaptations.
- 7.5. HPAS (handy persons jobs) provides a handy person's service to people on low incomes to undertake a range of small jobs such as changing light bulbs, fixing loose carpets to remove trip hazards and fitting door locks and key safes. The costs of a handy person job is currently £15.
- 7.6. HPAS also provides adaptations to people who own their home or rent from a private landlord (Registered Provider should provide this service to their tenants). The adaptation service has trusted assessors who can supply and fit small adaptations free of charge including an additional internal stair rail, internal and external grab rails.
- 7.7. HPAS is currently funded through top sliced money from the DFG. The HPAS budget is 8.1% of the total Nottinghamshire DFG budget (£7,886,632), excluding previous years' underspends or additional allocations by the UK government.

Table 1: Nottinghamshire DFG and HPAS Budget Forecast (24-25)

District	% of Total DFG Allocation Received by Each LA	Total Projected DFG 24/25	Total HPAS Projected Spend for 2024/25
HPAS Ashfield	13.28%	£1,142,064	£120,493
HPAS Bassetlaw	16.80%	£1,444,910	£170,407
HPAS Broxtowe	12.47%	£1,073,265	£114,713
HPAS Gedling	15.08%	£1,297,131	£142,921
HPAS Mansfield	18.07%	£1,554,962	£130,990
HPAS Newark	14.70%	£1,264,474	£115,562
HPAS Rushcliffe	9.60%	£825,541	£86,929
Total		£8,602,347	£882,015

- 7.8. There has been a 22.3% increase for HPAS services between 2020-2023. This coupled with increased cost resulted in an overspend of £139,720 for 2023-24. The County Council have agreed to cover the 2023/24 overspend but are not able to continue to do this in future years.
- 7.9. A review of HPAS is currently underway to develop a more sustainable countywide model of delivery and funding for 2024-25 and beyond. This includes moving away from a formula led approach to demand led allocations and exploring how future investment by the Integrated Care Board (ICB) would accelerate hospital discharge functions leading to bed cost savings.
- 7.10. In Rushcliffe, HPAS enabled 322 preventative adaptations during 2023-24 alleviating pressures on the mandatory DFG budget.

Disabled Facilities Grant (DFG)

- 7.11. DFG is a crucial component of the UK government's strategy to support individuals with disabilities by enabling them to make adjustments to their homes to meet their specific needs. Services can include the provision of minor adaptations and equipment, installing ramps and stairlifts to more structural modifications such as widening doorways, adapting bathrooms and kitchens or creating a ground floor extension.
- 7.12. Section 23 of the Housing Grants, Construction and Regeneration Act 1996 governs the operations of DFG. The DFG capital allocation is awarded to districts and boroughs through the Better Care Fund (BCF) which is administered by Nottinghamshire County Council as part of their Public Health role. National guidance sets out who is eligible for assistance and how DFGs should be administered. The allocation formula used to distribute funds to local authorities plays a vital role in determining how effectively these grants are delivered.
- 7.13. The DFG is a mandatory grant, which means that it is a legal requirement for local authorities to provide help to people who meet the eligibility criteria, whether or not the authority has sufficient budget. These criteria include

ensuring that the works are necessary and appropriate to meet the needs of the disabled person, and that they are reasonable and practicable given the age and condition of the property.

- 7.14. In 2022 Nottinghamshire districts and boroughs committed to an aligned countywide DFG policy to ensure a consistent level of service provision and clarity for the Occupational Therapists (OT services) and contractors working cross boundary.
- 7.15. A DFG award consists of two elements, a mandatory grant and a discretionary element. Mandatory DFGs are available from local authorities and are issued subject to a means test. They fund the cost of essential adaptations to give qualifying persons access to essential facilities in and around the home. There is an upper limit on the help available of £30,000 and a discretionary limit of £20,000.
- 7.16. The Council along with other districts and boroughs in the County can have a discretionary budget that allows them to top up the grant awardable under the legislation. Due to the continued pressures on the DFG budget and to prioritise mandatory DFG applications, the Council suspended its discretionary grant element in 2022. However, a growing number of major adaptations are priced above the current £30,000 limit, bringing into question the Council's ability to meet the needs of households with complex needs. This, coupled with the inflationary pressures within the construction sector, have resulted in significant shortfalls in grant to meet most major adaptations applications.
- 7.17. DFG eligibility and processing arrangements are set out in **Appendix 2 and Appendix 3**.

Types of DFG Adaptations & Costs

- 7.18. Overall, the most common DFG adaptation is a level access shower (42%). Stairlifts make up 18% of applications approved, ramps 17% and hoist and other equipment 10%. Extensions and remodelling, the most expensive adaptations for people with more severe impairments, only comprise of 13% of approvals but have the potential to have a significant impact on the budget.

The average costs of a DFG in 2023-24:

- 42% cost less than £5,000 (stairlifts, ramps or hoists)
- 33% were under £10,000 (mainly level access showers)
- 12% cost less than £20,000 (more complex jobs with multi elements)
- 13% of DFGs were over £20,000 (extensions and remodelling work).

- 7.19. The average cost of a grant has risen from just over £13,161 in 2022-23 to nearly £15,324 in 2023-24. This is likely to be due to a combination of factors: first, the increased complexity of cases, and secondly the increased costs of materials and labour in the construction sector.

- 7.20. Expensive grants are usually for more complex cases where people have severe impairments or limited mobility, particularly wheelchair users. Children with learning disabilities, autism spectrum disorder or social/behavioural problems, may need additional space separate from siblings. The work may include major remodelling of the existing living space and/or the building of a level access bedroom/bathroom extension.
- 7.21. The upper limit of the DFG is £30,000. This has not increased since 2008 and has not kept pace with inflation. The Council can place a local land charge if the cost of work is over £5,000, with a maximum of £10,000 able to be claimed back. During 23-24, £62,000 of land charges were placed on 13 properties, and no land charges were reclaimed in the same period.

DFG by Tenure

- 7.22. People who are homeowners, registered provider renters or private tenants can apply for a DFG. Adaptations to council owned properties are typically funded via the Housing Revenue Account.
- 7.23. Demand for accessible and adapted homes significantly outstrips the supply of suitable accommodation across tenures.
- 68% of DFGs go to tenants of Registered Providers,
 - 31% to owner occupiers
 - 1% to private rented sector tenants (23-24).
 - 9% of all applicants are from parents of children with disabilities who reside in the owner occupied and social housing sector.
- 7.24. Registered Providers continue to make significant use of the DFG which may also be attributable to clearer signposting. DFG adaptations not only benefit the applicant but also lead to improvements in the housing stock yet there is a general reluctance of Registered Providers to contribute to any shortfalls in DFG assessments. By taking a more proactive stance in providing financial assistance this would assist in removing barriers that prevent people with disabilities from accessing and using their services.
- 7.25. Nationally homeowners on low incomes have always been the biggest recipients of DFG funding as the grant mostly goes to older people (over 65) (MHCLG English Housing Survey 2014-15). In Rushcliffe during 23-24 the working age population (18-64 years) made up the largest sector requiring adaptations (54%), however, the age profile is likely to rise in the 2020s due to an increasing number of people with impairments getting into retirement age.
- 7.26. The private rented sector is clearly a major problem for those requiring adapted properties due to the transitory nature of the accommodation with private rented sector landlords often unwilling to facilitate adaptations. Only a small proportion (1%) of applications are received from applicants in this sector, but this is likely to increase as numbers in this tenure become greater due to the pressures on social housing.

DFG Resource Allocation

- 7.27. DFG is a crucial financial support mechanism that enables individuals with disabilities to gain greater independence in their homes through necessary adaptations. However, the effective delivery of this grant is increasingly challenged by budget constraints:

Funding Shortfalls

- 7.28. DFG grants are funded through a Better Care Fund (BCF) allocation paid directly to Nottinghamshire County Council, however, the legal responsibility for the provision of DFGs remains with the housing authority. One of the aims of the BCF is to achieve improved integration of care and support services through the improvement of local delivery of DFGs.
- 7.29. The allocation from national to local government is derived by way of a government formula and is intended to contribute towards meeting local need for DFG and other health related services but is not expected to meet all local needs. Rushcliffe Borough Council has historically received the lowest DFG allocation across all Nottinghamshire district/boroughs (see Table 1). The outdated government funding formula dating back to 2011 is a key causal factor for the current budget pressures.

Rising Costs of Adaptations

- 7.30. Inflation and supply chain disruptions have led to rising costs for materials and skilled labour, affecting the total number of adaptations that can be funded under the existing budget, resulting in affordability gaps for many disabled applicants. Cumulative inflationary rise since 2021 is 17.9%, however, funding increased by 8.7 % in the same period.

Increased Demand

- 7.31. A growing population with disabilities, exacerbated by a focus on aging in place, means higher requests for adaptations than can be financially supported. Housing in need of adaptations rose from 45% to 53% over 5 years (2015-2020, Source: English Housing Survey 2019-20).
- 7.32. The rising demand for Disabled Facilities Grants (DFGs) has highlighted the necessity for effective adaptations to residential properties to support individuals with disabilities. Pre-pandemic the Borough coped with DFG demands within its budget. Post pandemic the Council has seen exceptional cost and demand pressures in the Borough, with commitments and projections for future years show a worsening of financial pressures. This led to Rushcliffe injecting £500k of its own resources to meet expenditure demands.
- 7.33. Although the Council received the lowest allocation and carry forward for 23-24 (excluding the injection of RBC own resources and County Top-up grants),

spend was the highest in the County and RBC percentage of allocation spent was by far the highest:

Table 2: DFG Allocation in Nottinghamshire

District	Allocation & Carry Forward	Actual Spend	% Spend of Allocation
	£000s	£000s	£000s
Bassetlaw	2,964	651	22
Newark & Sherwood	2,897	369	13
Mansfield	2,110	1,048	50
Broxtowe	1,716	658	38
Ashfield	1,712	703	41
Rushcliffe	1,362*	1,087	80
Gedling	1,293	924	71

***1,362 is inclusive of RBC's own resources and County Top-Ups, net of these the allocation and carry forward would be 876.**

- 7.34. There is currently a misalignment between Government funding for DFG and actual expenditure on DFG at a local level resulting in an inequitable distribution of resources relative to need. In Nottinghamshire some Councils are not spending their allocations while others report being able to approve more DFGs if they had been awarded additional resources. This is the case in Rushcliffe with waiting lists being introduced to enable the Council to remain within current DFG allocations. Current waiting list times in Rushcliffe are 11 months.

8. Rehousing as an Alternative Option

- 8.1. Rehousing is an alternative to adapting where a property is unfeasible or very expensive to adapt, or where rehousing would provide a better solution and providing the household is willing to move. However, desire declines with age, with older people being the least prepared to relocate.
- Currently there are 3 applicants on the Councils' housing register who are owed a homelessness duty and require wheelchair adapted properties.
 - 25 (4%) applicants advise that they use a wheelchair in their home.
 - 48 (8%) applicants' state that they require adaptations to their existing homes and as such are looking to move.
 - 111 (19%) applicants claim high or medium rate Disability Living Allowance/Personal Independence Payments (this could be for a number of reasons including mental health, not just physical disabilities).
- 8.2. A common problem for many Councils is the matching of existing adapted properties to applicants with disabilities on the housing register. Quite often, the Registered Provider will only have a 4 week notice period to relet the property and will only be required to advertise this for 2 weeks on the Council's Choice Based Lettings System. Due to individuals' specific needs, it can be difficult to match up properties with adaptations and these may also be in an area that the household is not willing to consider.

- 8.3. Options are currently being explored with Nottinghamshire County Council to commission consultants to map the adapted housing stock in Nottinghamshire. Better use of the existing stock and the potential to establish an accessible housing register could create significant savings to DFG budgets and reduce length waiting times for customers. Joint working is also underway with the Nottinghamshire OT's to ensure the matching process of applicants with disabilities to adapted properties is more efficient.

9. Barriers to Accessible Housing

- 9.1. Various barriers exist that can impede access to accessible housing. Some of these barriers include:

- **Accessibility Standards**

Only a small proportion new-build properties adds to the accessible housing stock each year. Most disabled and older people are in the existing stock, not in specialised accommodation and rely on voluntary arrangements with developers to deliver accessible homes.

- **Data Collection and monitoring**

Home adaptation services have been good at reporting outputs (number of grants and amount spent) but not as good at measuring outcomes and impact (number of people helped to remain independent and impact on health and wellbeing) as this is much more difficult.

- **Tenure Inequalities**

There needs to be greater pressure placed on Registered Providers and private landlords to support adaptations funded by DFG in their properties. Registered Providers do not contribute to adaptations in their properties, yet they take up a large proportion of the DFG budget allocation.

- **Eligibility**

The DFG means test is in urgent need of reform and the current upper limit of £30,000 needs adjusting to account for inflation and to better reflect the cost of works (a ground floor extension to provide a bedroom and wet room may cost somewhere in the region of £60,000-80,000).

- **Service Pathways**

Housing authorities have the mandatory duty for the DFG, but social care has the ultimate duty for disabled and older people as well as disabled children. The DFG legislation requires the housing authority to consult the social care authority, resulting in occupational therapists in social care handling the first part of the customer journey with a handover to the housing authority to complete the work. There is no service with overall responsibility or a single point of contact throughout the customer pathway.

- **Inequity in Resource Availability**

Despite efforts to promote equity, the nationally set DFG formula can still result in disparities. Some local authorities may receive disproportionately higher funding compared to others based on historical data which may not

accurately reflect current needs. This means that individuals in some areas will have greater access to funds for home modifications than others leading to unequal opportunities for support and service. Within Nottinghamshire, Rushcliffe receives the lowest DFG allocation and must operate a waiting list of significant time. The resulting effect is a 'post code lottery' for access to adaptations

10. Future Options for Change

10.1. Addressing the barriers requires a multi-faceted approach, involving policy changes, a commitment to inclusive design from all stakeholders involved in housing development, better joined up working focused on outcomes and improved funding. Potential options for change:

- The latest housing needs evidence base suggest that there is a need to increase the supply of accessible and adaptable dwellings, including wheelchair-user dwellings to meet local housing need. Without raising accessibility standards in new homes and mandating the current M4(2) requirement in Building Regulations as a minimum standard for all new homes, there is a risk that the housing market will continue to fail to deliver accessible homes of the nature and scale required
- Advocate for increased funding from central government and a more equitable distribution of funds based on local needs so that local authorities can meet rising demand for DFGs, including moving away from formula led DFG and HPAS allocation to demand led (historical) allocations. This would go some way towards addressing the imbalance between budget and demand, causing some councils to use their own funds to continue funding mandatory DFGs
- A key reason for the difficulties in the operation of the DFG is the split in responsibilities. Councils currently separately manage their allocations and the processes required to manage requests for adaptations. Developing centralised back-office functions could lead to cost savings and risk sharing speeding up the customer journey and ensuring the most effective use of resources given the potential impact on health and care outcomes
- Raising awareness of the benefits of adaptation provision within wider service pressures and demands across other health and social care budgets which assist in the number of people helped to remain independent at home. More recently, the Nottinghamshire Integrated Care Board have agreed to review how investment is made into adaptations and hospital discharge services which can lead to bed costs savings.

11. Conclusions

11.1. The Borough Council's current local plan seeks a small proportion of accessible dwellings on qualifying sites. The emerging Greater Nottingham Strategic Plan, should it be found sound by a planning inspector and adopted by the Borough Council as its planning policy, will significantly improve upon this by requiring

all new dwellings to meet the M4(2) accessible and adaptable dwelling standard.

- 11.2. The DFG process and Handypersons schemes are a vital component of support for individuals with disabilities facilitating necessary home adaptations in existing housing. However, delivering DFG within the existing budget constraints poses significant challenges that can potentially hinder the ability of the Council to support disabled individuals effectively.
- 11.3. By addressing the barriers through targeted recommendations and strategic planning, the Council can support the independence and well-being of community members with disabilities thereby reducing the demand on health and care systems. Continued collaborative working between housing, health and social care to identify integrated solutions would assist in addressing some of the current disparities in service provision within the county.

12. Risks and Uncertainties

- 12.1. The requirement in the future for all new dwellings to meet at least the M4(2) accessible and adaptable dwelling standard depends upon the policy being found sound by a Government appointed planning inspector.
- 12.2. The demand for DFGs and pressures in the building sector have increased leading to concerns about the historic methodology of DFG funding allocation to meet current demands for property adaptations.

13. Implications

13.1. Financial Implications

In 2022, the Council put an additional £500k capital into the provision of DFGs in the borough and this was partly used to meet expenditure in 2022/23 and 2023/24. It is projected that the balance of £206k will be needed to support expenditure demands in 2024/25 and 2025/26. These are grants to support residents to stay in their properties by undertaking capital works to the premises when the resident has additional needs due to a disability. The grants are means tested unless they are for the needs of a disabled child in which case they are not means tested. Grants are for up to £30k of works (mandatory grants).

£826k was allocated to RBC in 2024/25 by BCF administered by Nottinghamshire County Council. This is based on a government formula. Rushcliffe is allocated less than any other district in the county – see table 1 . In the proposed budget, it is not planned to top the allocation up from the Council's own resources.

There is a small team that manages and administers the Disabled Facilities Grants for the borough. The effect of having less budget is that the waiting list for a DFG is lengthened. "Time of the essence" cases are prioritised. The council has highlighted to Nottinghamshire County Council and to Civil Servants

the issues with the current allocation of money to Rushcliffe not meeting all the demand. Like many services, the Council needs to work to the budget allocated. To continue the budget top up of £250k p.a. would put additional strain on the Council's capital resources which are diminishing. In terms of the MTFs, over 5 years, this would amount to an additional £1.25m reducing the projected capital resources available for future capital spend from £3.395m to £2.145m.

This pressure is not sustainable in the long run. As they are capital grants to individuals there is no financial return to the council or economic benefit to what is grant funding albeit there is a clear social benefit to the effected residents and the wider community. It is anticipated that spending demands can be achieved in 2024/25, however, if the allocation for Rushcliffe is not increased going forwards, it is projected that there will be a break even position for 2025/26 but a year on year deficit from 2026/27 in the region of £300k per annum. Given this, it is recommended that the Council continues to push for a change in the amount of BCF allocated to Rushcliffe and works within the budget constraints of the government grant allocation. Any additional funding has to be considered in the context of other priorities (such as Climate Change) and is ultimately approved with the budget to Full Council. As stated above, fundamentally existing capital resources are fast diminishing and the Council has to 'cut its cloth' accordingly whilst adhering to legislation.

13.2. Legal Implications

The provision of Disabled Facilities Grants (DFGs) is a statutory requirement.

The preparation and review of a Local Plan is a statutory requirement.

13.3. Equalities Implications

The Council is committed to promoting a more inclusive and accessible housing sector by utilising planning powers on new developments and the provision of DFG grants to facilitate adaptations to existing properties across all tenures.

The Disabled Facilities Grant Policy takes account of the effect of the Council's priorities on all residents of the Borough and is supported by the Council's Equality and Diversity Scheme. An equality impact assessment has been carried out and no adverse impacts have been identified.

13.4. Section 17 of the Crime and Disorder Act 1998 Implications

There are no Crime and Disorder implications in this report.

13.5. Biodiversity Net Gain Implications

There are no biodiversity implications in this report.

14. Link to Corporate Priorities

The Environment	Large scale works will adhere to updated environmental regulations thereby improving the efficiency of the dwelling
Quality of Life	Continued investment to make homes fully accessible will enhance the lives of disabled residents
Efficient Services	An aligned approach at a county level to meet demand for accessible housing and adaptations will provide economies of scale and better joined up working practices
Sustainable Growth	Increasing the supply of accessible housing will enable disabled residents to remain independent in the community and reduce the pressures on statutory services

Recommendations

It is RECOMMENDED that:

- a) the Communities Scrutiny Group & Growth and Development Scrutiny Group scrutinises the information provided by officers to enhance the provision of accessible housing; and
- b) explores actions that the Council can take to meet the housing needs of residents with disabilities.

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Background papers available for Inspection:	'Current and Future Pressures in Disabled Facilities Grants Facilities' considered on 12 July 2022 and 'Disabled Facilities Grant Policy' considered on 8 February 2022	
List of appendices:	Appendix 1 - Housing Needs Appendix 2 - DFG Eligibility Appendix 3 - DFG Processing Arrangements	

Appendix 1 – Housing Needs

1. According to the 2021 Census, 17.7% of people in England have a disability. Government, local authorities and developers all have a role for ensuring the delivery of suitable, accessible housing for their residents.
2. The latest Housing Needs Assessment was produced by Icenl in 2024 to support the emerging Local Plan. This identified that there is a need for specialist housing in the Borough, in particular for adapted or adaptable housing
3. Table (i) shows the proportion of people who are disabled under the Equality Act drawn from 2021 Census data, and the proportion of households where at least one person has a disability. The Rushcliffe data suggests that nearly 30% of households contain someone with a disability and 16% of the population has a disability, slightly lower numbers when compared with other areas.

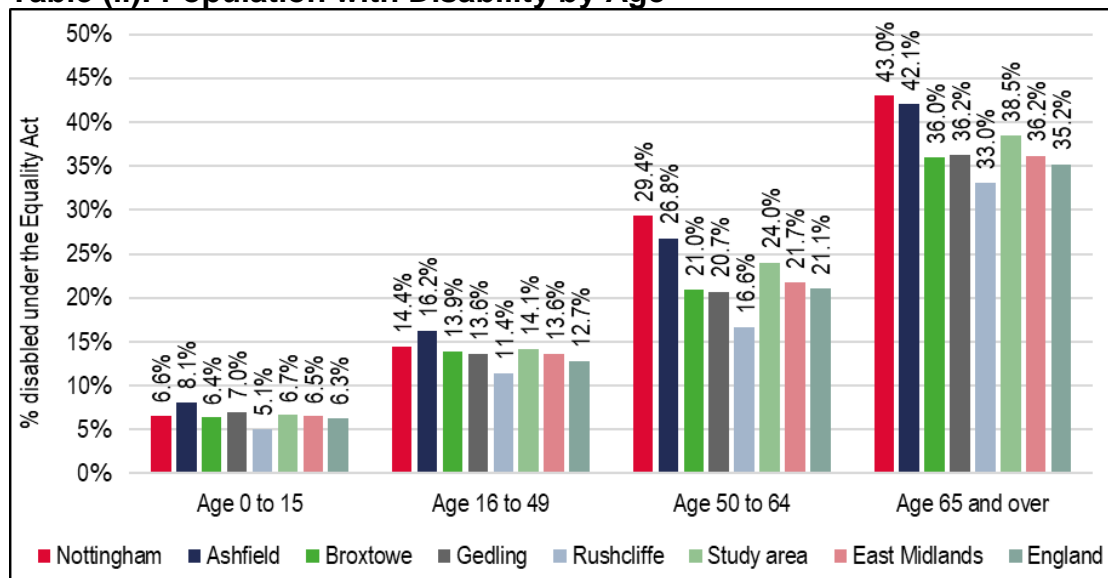
Table (i): Households and People with a Disability 2021

	Households Containing Someone with a Disability		Population with a Disability	
	No.	%	No.	%
Nottingham	44,780	35.9%	60,218	18.6%
Ashfield	20,992	38.5%	27,809	22.0%
Broxtowe	16,135	33.4%	20,978	18.9%
Gedling	17,230	33.4%	22,062	18.8%
Rushcliffe	14,565	29.2%	19,074	16.0%
Study Area	113,702	34.6%	150,141	18.8%
East Midlands	680,791	33.4%	894,920	18.3%
England	7,507,886	32.0%	9,774,510	17.3%

Source: 2021 Census

4. Table (ii) shows how the age profile will likely impact upon the number of people with a disability, as older people tend to be more likely to have a disability. Within Rushcliffe 5.1% are in the 0-15 age group, 11.4% are in the 16-49 age group, 16.6% are in the 50-64 age group and 33% are in the age 65 and over age group.

Table (ii): Population with Disability by Age



Source: 2021 Census

- The incidence of a range of health conditions is an important component in understanding the potential need for care or support for a growing older population. Table (iii) shows an increase in all disabilities, with a 42% increase in the number of older people with mobility problems in Rushcliffe.

Table (iii): Projected Changed to population with a range of Disabilities (Rushcliffe)

Disability	Age Range	2023	2041	Change	% Change
Dementia	65+	1,860	2,785	924	49.7%
Mobility problems	65+	4,774	6,782	2,008	42.1%
Autistic Spectrum Disorders	18-64	594	679	85	14.3%
	65+	234	311	76	32.6%
Learning Disabilities	15-64	1,563	1,775	211	13.5%
	65+	521	683	162	31.1%
Impaired mobility	16-64	3,546	3,811	265	7.5%

Source: POPPI/PANSI and Demographic Projections

- Invariably, there will be a combination of those with disabilities and long-term health problems who continue to live at home with family, those who chose to live independently with the possibility of incorporating adaptations into their homes and those who choose to move into supported housing.
- Table (vi) data estimates that within Rushcliffe 456 wheelchair user homes will be required by 2041(5 dwellings per annum).

Table (iv): Estimated Need for Wheelchair User Homes, 2023-41 – Local Authorities (based on 25% of projection)

	Current need	Projected need (2023-41)	Total current and future need
Nottingham	1,337	328	1,665
Ashfield	635	144	780
Broxtowe	430	79	509
Gedling	481	103	584
Rushcliffe	359	97	456
Study area	3,242	752	3,994

Source: Derived from a range of sources – Greater Nottinghamshire and Ashfield Housing Needs Update 2024, Icen

8. The projected change shown in the number of people with disabilities and the estimated need for wheelchair user homes provides further evidence to support delivering ‘accessible and adaptable’ homes as defined in Part M4(2) of Building Regulations. To meet this need, the Council could seek a proportion of all new market homes to be M4(3)(A) compliant (adaptable) and potentially a higher figure in the affordable sector to be M4(3)(B) (accessible).
9. As well as evidence of need, and site suitability, the viability challenge is particularly relevant for M4(3)(B) standards. These make properties accessible from the moment they are built but involve additional costs that could in some cases challenge the deliverability of a policy target. Table (v) shows estimated costs for different types of accessible dwellings (these costings are now 10 years old but do still indicate the relative costs of different options).

Tables (v): Access Cost Summary

	1-Bed Apartment	2-Bed Apartment	2-Bed Terrace	3-Bed Semi Detached	4-Bed Semi-Detached
M4(2)	£940	£907	£523	£521	£520
M4(3)(A) – Adaptable	£7,607	£7,891	£9,754	£10,307	£10,568
M4(3)(B) – Accessible	£7,764	£8,048	£22,238	£22,791	£23,052

Source: EC Harris, 2014

10. There is no reliable, easily accessible data at local authority level on whether people require and could benefit from adaptations to their home. Baseline indicators such as means tested benefits, indices of multiple deprivation (IMD) and census information for people with long term disabilities can only be regarded as proxy indicators of need.

Appendix 2 – DFG Eligibility

Eligibility for a DFG is determined by several factors:

- **Disability:** The applicant must have a physical or mental disability that significantly impacts their ability to carry out daily activities. This includes conditions that affect mobility, vision, hearing, or cognition.
- **Age:** There is no specific age limit; however, the grant is often sought by individuals who are elderly or have disabilities developed in childhood.
- **Means Testing:** Applicants' financial situations will be assessed to determine if they qualify for assistance. This involves assessing income and savings
- **Ownership and Tenure:** Applicants must either own their home or have a long-term lease; social housing tenants can also apply, with permission from their landlords.

Appendix 3 – DFG Processing Arrangements

The timeline for processing the application can vary significantly, depending on the complexity of the case, assessment duration, and required adaptations. The legislation itself contains very little about how the grant process should work, apart from saying that:

- The grant cannot be approved if works have already started
- There is a need to consult the social services authority
- A decision notice is to be issued within 6 months of the date of a valid application.

Processing arrangements means that there can be different waiting lists. There may be a wait for an initial assessment for aids, equipment or minor works; another wait for a full occupational therapy assessment; and a further wait for a DFG means test and grant approval.

An added complexity for the operation of the DFG is the split in responsibilities. Housing authorities have the mandatory duty for the DFG, but social care has the ultimate duty for disabled and older people as well as disabled children. The DFG legislation requires the housing authority to consult the social care authority, resulting in occupational therapists in social care handling the first part of the customer journey with a handover to the housing authority to complete the work.

