

Disabled People in the Housing Sector: DLUHC Select Committee Inquiry September 2023

Evidence submission from the Housing Made for Everyone (HoME) Coalition

About the HoME Coalition

The [Housing Made for Everyone \(HoME\) coalition](#) is calling for immediate action to tackle the UK's acute and growing shortage of accessible homes. We want the Government to act urgently on its commitment to raising standards to ensure all new homes in England are built to be accessible and adaptable as a minimum.

The [Housing Made for Everyone \(HoME\) coalition](#) is a group of nine charities and NGOs working together to make the case for more accessible and inclusive housing to meet the wide range of needs of disabled and older people living with a range of impairments. It is chaired jointly by [Habinteg](#), and [Centre for Ageing Better](#), with other founding members being [Age UK](#), the [Royal Institute of British Architects](#), [Disability Rights UK](#), [Housing LIN](#), the [National Housing Federation](#), [the Chartered Institute of Housing and the Town and Country Planning Association](#).

Introduction

A primary concern for the HoME coalition is the accessibility standard of new build homes and our response to the committee's call for evidence will focus largely on this aspect.

Since October 2015 Building Regulations (Approved document M Volume 1) has provided three technical accessibility standards that can be used in new homes.

M4(1) Category 1: Visitable dwellings. This is the mandatory baseline. Whilst it offers some basic accessibility features (such as door widths and corridors of a size suitable for a range of people including wheelchair users), it fails to guarantee true 'visitability' to all, and the adaptability that many households will need over their lifetimes.

M4(2) Category 2: Accessible and adaptable dwellings. This standard is an inclusive and adaptable standard offering enhanced access features and benefits to all households over the lifetime of the home.

M4(3) Category 3: Wheelchair user dwellings. This standard specifies accommodation to meet the needs of a household that includes a wheelchair user. Within the M4(3) standard two subcategories are available:

M4(3)a: wheelchair adaptable (meaning that they meet spacial and layout requirements but may not have been fully fitted and finished to accommodate immediate use by a wheelchair user)

M4(3)b: wheelchair accessible (meaning that the dwelling is fully ready for occupation by a wheelchair user household).

At present the 'visitable' standard, M4(1) is the default baseline standard for all new homes. Provision for new homes to be built to the two higher standards (M4(2), Accessible and adaptable standard and M4(3) the wheelchair user dwelling standard) is 'optional' and is prompted by Local Planning Authorities through policies established in each of England's 324 local plans.

In July 2022 government announced its intention to raise the default standard for new homes in England to the M4(2) Accessible and adaptable dwellings standard. The announcement included the intention to conduct a further industry consultation on how exceptions to the new default standard might be set out and the overall implementation timetable. However, to date there has been no further information released on either the consultation or the date on which this adjustment to regulations will come into force.

[Government projections](#) show that over 70 per cent of UK population growth between 2014 and 2039 will be in the over 60 years old age group, an increase from 14.9 to 21.9 million people. ([Housing our ageing population | Local Government Association](#)).

The M4(2) standard provides dwellings that are adaptable for people's needs over their whole life course and can be powerful in meeting the housing needs of the ageing population. Demand for new wheelchair accessible homes will also continue to rise as the population ages. [Just 9% of England's current housing stock](#) offer even the most basic 'visitability' features so against a backdrop of this accessible homes shortage it is vital that the design of new homes is addressed as a strategic priority.

1. What can the Government do to ensure disabled residents across England have access to accessible and adaptable housing?

One key response to the disadvantage that disabled people face in securing appropriate housing is to increase the number of accessible properties by ensuring that new build homes suit a wider range of needs. The National Planning Policy Framework directs local planning authorities to specify housing and planning policies using the optional (higher) standards set out in Part M of building regulations to ensure that new homes in each area will assist in meeting the needs of older and disabled people.

Whilst the aim of building new homes that are either accessible and adaptable as people's needs change (M4(2)) or are specifically designed to meet the daily living needs of wheelchair users (M4(3)) is widely appreciated as a positive goal there are a number of factors challenging this outcome, many of which Government can act to resolve.

At the Habinteg Housing Summit in March 2022, six expert panellists from across the sector identified seven barriers to providing accessible housing in the UK.

They also recommended ways to overcome those barriers, resulting in [a Roadmap for Accessible Housing](#).

The barriers they identified are:

1. The lack of an effective national baseline for accessibility
2. Concerns about viability restrict local plans' ability to deliver accessible homes

3. A lack of specialist knowledge around accessible housing. The report identified a need for accessibility training for the professionals who design pedestrian and cycle routes in new developments. Organisations should work in partnership to achieve the overarching intention to create an accessible and inclusive environment and public realm and this is particularly key in housing developments where accessible homes are built.
4. The perception that accessible homes are more expensive
5. Society's lack of awareness around the benefits of accessible housing
6. The perception that accessible means an institutional or medical feel
7. The challenge for registered providers of allocating vacant accessible homes in light of turnaround targets.

Additional evidence on the value of wheelchair user homes in particular has been recently published by Habinteg in its 2023 report, [Living not existing: the social and economic value of wheelchair user homes](#). The report, which resulted from research conducted by the London School of Economics found that the overall positive value of the benefits of new wheelchair accessible housing is far greater than the costs of building such homes.

The [Habinteg report](#), found that for a working age wheelchair user, the benefit of living in a wheelchair user home can be valued at £94,000 over a 10 year period, with average 'additional build cost of £22,000 this represents benefits worth four times the cost.

For a later years wheelchair user household (aged 65 and over), the benefit could be £101,000 over a 10 year period compared to an average additional cost to build of £18,000 this suggests 10 year value five times the one off extra cost to build.

And for a household with a child who is a wheelchair user, the benefit of living in a suitable wheelchair user home could be £67,000 over a 10 year period compared to additional build cost of around £26,000, offering a benefit two and a half times the investment.

Therefore the HoME Coalition would like to see the Government:

1. Implement without further delay the planned new M4(2) regulatory baseline for accessible homes and ensure that all Local Authorities enforce the requirements to build to the accessible and adaptable standard. This will provide greater accessible and adaptable housing choice for all.
2. Revise the National Planning Policy Framework to explicitly require all local plans to include a specific policy and target for new wheelchair accessible (M4(3) homes, and where no local target is set to require 10% of new homes to meet the standard.
3. To strengthen the Planning Inspectorate's approach to examining planning policies for accessible homes, particularly to ensure inspectors gain assurance on the adequacy of plans for M4(3) homes.
4. Ensure that Homes England prioritises funding for developments that provide new wheelchair accessible homes across a range of house types and tenures.

2. Does the National Planning Policy Framework ensure the Equality Act 2010 is complied with when building housing?

There is more work to be done in the NPPF to ensure that the Equality Act 2010 is complied with when building housing. For example, a search for the term 'inclusive' shows that it is used twice, but is not listed as one of the fundamentals of good planning (par 126).

Given that wheelchair users are disproportionately disadvantaged by the built environment if it is not designed in an inclusive way it is disappointing that the NPPF does not use the term 'wheelchair user' at all and mentions only in a footnote (footnote 49) the optional standards set out in part M of building regulations. Moreover the reference in footnote 49 is not precise, referring in general terms to 'accessible and adaptable' housing, which taken in conjunction with the Part M document itself could be misunderstood to be referring to M4(2) only.

We urge that every opportunity is taken to ensure that Public Sector Equality Duty (PSED) opportunities are maximised.

There is a clear opportunity to ensure that proposals "advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it", in particular in relation to disabled and older people as equal members of society. Paragraph 133 in particular could be strengthened to set expectations that local community engagement be conducted in as inclusive a manner as possible with references to associated useful guidance documents (see response to 'what local authorities should do').

3. Since the Government consultation 'Raising accessibility standards for new homes' (July 2022), what has been done to improve housing provisions for disabled residents in England? And has it been sufficient?

As noted in our introduction, since making this announcement there has been no further information provided on the timetable for implementation of the new updated baseline regulatory standard.

Following on from its 2020 [Forecast for Accessible Homes report](#), Habinteg examined all 324 local plans in England for a third time in the summer of 2023.

In 2023, the number of adopted local plans in England specifying building regulation M4(2) 'accessible and adaptable' standard is 40% (131). The number of adopted plans specifying the use of the building regulation M4(3) 'wheelchair user dwellings' standards has increased to 116 in 2023.

However, of the emerging local plans, a further 82 local authorities specified the M4(2) regulation and 70 specified the M4(3) regulation.

This leaves over a third of local Planning Authorities without any planning policy related to the currently 'optional' accessible homes standards.

There appears to have been no direct effect of the July 2022 announcement on local plan provisions for accessible homes.

As a consequence, a significant proportion of new homes (approximately 75% according to Habinteg's forecast calculations) that have received planning permission in the intervening months will be built out on the basis of the current default M4(1) 'visitable standard', missing

an opportunity to future proof them through the use of the M4(2) accessible and adaptable standard.

HoME Coalition recommends that:

- a) Government should, **without delay**, implement its plan to introduce the higher regulatory baseline for accessibility of all new homes (M4 Category 2), the This will provide a level policy playing field across the country and the certainty that developers want, enabling them to build homes that meet the future needs of disabled people and our ageing population.
- b) Central Government should collate and make publicly available data from every planning authority on the number of new homes built to each of the categories set out in Approved Document M4 Volume one (access to and use of buildings).
- c) Homes England, in line with action already taken by the Greater London Authority, should give priority to development bids for homes that meet M4 Category 2 standards. These should also include a number of Category 3 wheelchair accessible properties. If necessary, the additional costs should be recognised in the Value for Money assessment and grant awarded for affordable housing.
- d) Government should require Local Authorities to review and keep up to date with the accessibility of housing in their area in preparation for an accessible housing database that will make finding the right home easier for people with specific requirements.

4. What role should the Government, Local Authorities and developers have for ensuring the delivery of suitable housing for disabled people?

Government

Government should set clear national rules for local authorities and developers to follow, and should create a golden thread between these and the role of bodies such as Homes England and the Planning Inspectorate to ensure a coherent and aligned policy context for delivering the homes that disabled people need.

Right now, government should implement the preparatory steps to establish the M4(2) accessible and adaptable homes standard as default regulatory baseline without delay. The 'accessible and adaptable' homes standard should be implemented swiftly as the national baseline, with any exceptions to the standard kept to an absolute minimum.

As mentioned earlier, government should strengthen the Planning Inspectorate's approach to examining planning policies for accessible homes, particularly to ensure inspectors gain assurance on the adequacy of plans for M4(3) homes, on the basis that every local plan should address the current and anticipated need for homes to meet the needs of disabled people.

To address accessibility in the existing housing market, the government should introduce a nationally applicable mandatory accessibility assessment for sale or rental properties.

Local Authorities

Local Authorities should maintain data on the accessibility of stock in their area as well as monitoring the accessibility of new homes built.

Every local planning authority should use the analysis provided by the LSE team in its [report](#) to help set a target for delivery of new M4(3) wheelchair accessible homes. Government should set a default target of 10% if no other target is established. (Currently only half of the 324 adopted and draft Local Plans contain a target for M4(3) homes).

Local authorities should actively consult disabled and older people in the development of local area plans and the Planning Inspectorate should require evidence of this in the local area plan. Officers planning consultation events and activities may wish to refer to The Equality and Human Rights Commission [event planning guide for consultation with disabled people](#) (2018) which is a useful recommended resource. Chapter eight of The Royal Institute of British Architects [Inclusive Design Overlay](#) resource (2023) also includes a section on engaging with user groups and inclusive communication.

Allocations policy and practice for social housing should be improved to ensure better access for wheelchair users to suitable accommodation. This starts with having an understanding of the accessibility of each home and providing clear information on this at the point of listing. Landlords and local authorities should follow the recommendations set out in the [Equality and Human Rights 2018 commission toolkit for improved allocations practice](#).

We recognise that local authority resources are stretched and that, according to the [Institute for Government](#) planning teams are among the most pressurised in the public sector. So provision of additional resource is an overarching requirement if we are to improve provision of accessible new homes.

However if the recommendation to amend the regulatory baseline is implemented promptly planning teams will be relieved of the need to differentiate targets for M4(2) homes in their local plans which will free up some capacity with which to better investigate the need for M4(3) homes and potentially provide reporting on new homes built.

It should also be noted that according to the LSE research commissioned by Habinteg, if more wheelchair user homes are built the biggest financial gains accrue to local authorities in the form of reduced social care expenditure because accessible properties can reduce people's ongoing requirement for social care support at home as well as major costs incurred if a person requires residential care. The [Living not existing](#) report finds that for a working age wheelchair user the potential annual saving for a local authority is around £5,000, and for a later years wheelchair user this rises to a £9,000 potential saving per annum.

What Developers should do:

Developers should ensure accessibility standards are adequately followed in new homes, provide adequate training for all relevant roles and draw on the technical expertise of access professionals to check plans and construction specifications before dwellings are built.

Ensuring healthy and inclusive homes is not just about 'housing' in isolation but also about the surrounding neighbourhood, they are situated in. So developers should work with the

relevant local authorities, such as transport, parks and play teams to ensure that neighbourhoods are conceived to be inclusive of disabled people's varying needs.

The Healthy Homes campaign lead by the Town and Country Planning Association calls for eleven statutory principles. As well as the principle that all new homes must be accessible, inclusive and adaptable, includes a principle that all new homes must ensure access to amenities, green infrastructure and sustainable transport. We encourage the committee to reflect on the clear evidence of importance of the quality of placemaking when meeting disabled people's housing needs, including the inclusive design of streets, green spaces and wider neighbourhoods for people of all abilities and throughout their life course (e.g. refs: [Bird et al, 2018](#); [Douglas et al, 2017](#); [Mitchell and Burton, 2007](#)).

Developers should also ensure marketing information and is clear on the accessibility of properties. They should target their marketing of wheelchair accessible homes for a specified period of time when new developments come on stream. Marketing material and hoardings should include images of disabled people so that disabled households identify new properties as 'for them'.

Conclusion

HoME members have addressed in this response the inquiry questions that are most relevant to the coalition's [vision and charter](#). If committee members would value further evidence from the coalition we would be very happy to support the inquiry in any way we can.

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