

Insight report

A forecast for accessible homes



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Foreword

Home is a space to personalise, a place in which to build relationships, to explore our talents and interests, a base from which to study and work. A home that meets our needs is fundamental to all of us.



Most people looking for a place to live look for things like location, size and affordability, but for disabled people, the accessibility of a potential home is paramount. As the personal stories profiled in these pages demonstrate, the right home is vital to wellbeing and fulfilment. Far too often the lack of accessible housing means that disabled and older people simply don't have that place from which to build connected, independent lives.

The scale of need is significant and growing. There are 13.9 million disabled people in the UK and predictions for our ageing society show that by 2036 28% of the UK population will be 65 and over¹. However, according to the English Housing Survey just 7% of housing stock in England offers even the most basic accessibility features. If we don't address this deficit more older and disabled people will be making unwanted and costly moves to residential care, our hospitals will continue to struggle to discharge patients because of unsuitable home environments, and people will need more costly adaptations to support them to live safely.

Homes need to last a long time and meet the needs of a series of different households. Some estimate that homes built today will need to last 2000 years given our current rate of development². So it's critical that what we build now is fit for a range of needs, for current and future generations.

An official report for government in 2014 estimated that without new regulations 47% of new homes would be built to the accessible, adaptable Lifetime Homes standard by 2024³. A year later, the introduction of new Building Regulations for accessible homes was an important step, establishing a national standard for accessible housing, but what impact would the changes have on delivery?

This report demonstrates that even in the best case scenario, delivery of accessible new homes in England is set to fall far short of the 47% benchmark.

We don't think it has to be this way. In London a policy has been in place for over ten years requiring 90% of new homes to be accessible and adaptable with a further 10% built to meet the needs of wheelchair users. And whilst times are tough for local authorities and demands on planning teams are high, we are confident that there is an appetite for best practice.

Habinteg's policy team are keen to support local authorities to help boost plans for accessible homes and our technical consultancy team at Centre for Accessible Environments offer a range of training on housing standards and their practical application.

So, if the content of this report inspires a desire to improve plans in your area, do please get in touch.

Sharon Carter, Chief Executive, Habinteg

Key terminology

Since October 2015 *Building Regulations Approved document M Volume 1* has provided three technical accessibility standards that can be used in new homes⁴.

1. **M4(1) Category 1:** Visitable dwellings is the **mandatory baseline**. Whilst it offers some basic accessibility features (i.e door widths and corridors of a size suitable for a range of people including wheelchair users), it fails to guarantee the true visitability and adaptability that many households will need over their lifetimes, for example, level access into the dwelling is not always provided.
2. **M4(2) Category 2:** Accessible and adaptable dwellings is very similar to the Lifetime Homes Standard, a flexible and adaptable standard offering enhanced access features and benefits to all households over their lifetime and over the lifetime of the home.
3. **M4(3) Category 3:** Wheelchair user dwellings is broadly equivalent to Habinteg's Wheelchair Housing Design Guide (2nd edition), specifying accommodation to meet the needs of a household that includes a wheelchair user. Within the M4(3) standard two sub-categories are available to specify:
 - **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).

NB: For the purposes of this report we have reported requirements for M4(3) homes of either type as one measurement.

- **Lifetime Homes:** The Lifetime Homes Standard is a series of sixteen design criteria intended to make homes more easily adaptable for lifetime use at minimal cost.
- **Wheelchair user dwelling standards:** Before 2015 there was no singular wheelchair housing design standard. However, guides and examples of best practice existed such as the Habinteg Wheelchair Housing Design Guide (1st and 2nd edition).
- **The Planning Inspectorate** is responsible for examining local plans and ensuring they are in line with government guidelines. The Planning Inspectorate must approve all plans before they can be adopted.

Policy framework

M4 Categories 2 and 3 are 'optional technical standards'. Planning authorities have the option of setting out in their local plan a requirement for a proportion of new homes to be built to each standard. This requirement is subsequently applied through planning conditions placed on individual developments. To adopt such a policy the authority must provide evidence of need in their area and the plan overall must be viable.

Prior to October 2015 any policy wording in Local Plans relating to accessible housing would most commonly refer to the Lifetime Homes standard and the Wheelchair Housing Design Guide. However since the introduction of the optional technical standards for access, Local Planning Authorities are required to refer only to the Building Regulations (M4) standards in plan making. Therefore in terms of local planning, the Lifetime Homes and Wheelchair Housing Design Guide have been superseded.

Government guidance states:

*"Where a Local Planning Authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and/or M4(3) of the optional requirements in the Building Regulations... They should clearly state in their local plan what proportion of new dwellings should comply with the requirements."*⁵

When the new optional technical standards were introduced, the written ministerial statement set out transitional arrangements. They indicated that any adopted local plan setting requirements for older accessible housing standards such as Lifetime Homes or the Wheelchair Housing Design Guide, "...should be interpreted by reference to the nearest equivalent new national technical standard" - i.e. the M4 standard⁶.

Do accessible homes get built if the Local Plan doesn't specify a policy?

Whilst local plans are the main strategic driver for delivery of accessible housing across all tenures, sometimes accessible homes are provided for other reasons. An example of this is where developing organisation with a particular social purpose or a focus on quality will voluntarily adopt an access standard.

Examples of this have been seen in the housing association sector and more recently among local authority housing companies such as The Sheffield Housing Company and the Birmingham Municipal Housing Trust. In these instances, the local authority partnership bodies specified the Lifetime Homes standard for new homes as a way to ensure quality and long lasting usability of the homes to a range of households.

Sam's story

“The fact that there is limited housing can be frustrating. Even though I feel very grateful to have my now fully accessible home that is adapted to my needs, I do feel a little bit trapped. I am an actor and I may have to go work somewhere else for six months. Would I be able to find somewhere else that suits my needs or would I have to turn down a job opportunity because there's not enough housing that's accessible? If I meet someone, if I get married what would happen then? Would I have to ensure I have enough money to buy a property and then adapt it?”

Sam Renke

London (originally from the North West of England)

“...would I have to turn down a job opportunity because there's not enough housing that's accessible?”



Key findings

Review and analysis of 322 local plans in England reveals the following insight:

The planned development of accessible housing is set to fall short of previous official predictions³.

- Outside London just 23% of new homes are set to meet any optional access standards. A quarter of those due to be built by 2030 are planned to meet either the current M4(2) accessible, adaptable standard and the older Lifetime Homes standard.
- Just 1% of homes outside London are set to be wheelchair accessible properties, most of which are specified as M4(3) standard wheelchair user dwellings.
- London's ambition to deliver all new housing to an accessible and adaptable standard bolsters the national forecast which shows that 20% of all new homes will be built to M4(2) accessible and adaptable standard by 2030 with a further 12% nationally required to meet Lifetime Homes standard.
- Nationally just 1.8% of new homes are set to be built as M4(3) wheelchair user dwellings with a further 0.6% required to meet older wheelchair housing design standards.
- The region outside London with the highest level of requirement for current M4 accessible standards (the East of England) has plans for 29% of all new homes to either M4(2) or M4(3) with a further 8% to older standards.
- In the West Midlands region just 10% of new homes are required to be built to accessible standards however they are all specified to the older Lifetime Homes standard.

The majority of local plans have no specified requirement for a proportion of new homes to meet any accessible or adaptable housing standard.*

- Less than half of all English local plans set specific requirements for a percentage of new homes to be built to accessible or adaptable standards.
- Less than a third of local plans set requirements to build homes to the current Building Regulations 2015 'optional access standards'.
- 45 local plans still refer to older accessible housing standards, putting planning requirements at risk of challenge.
- Less than one fifth of plans include a requirement for any wheelchair user dwellings.
- One region in England had no local plans with requirements for the 2015 optional access standards.
- In one region there was no requirement to build any homes suitable for wheelchair users.

*by 'any accessible or adaptable standards' we mean either standards in use before 2015 or those introduced into building regulations in 2015 (see p.4).

Recommendations

For the Government

- Habinteg are calling on the Government to make accessible and adaptable (M4(2) Category 2) the mandatory baseline for all new housing, and for planning authorities to ensure an adequate number of wheelchair accessible properties M4(3) Category 3 are built to meet needs in their area. This policy has been in place since 2004 in London and should be rolled out nationally.

We believe it works for London because:

- M4(2) Category 2 works as a basic design standard for all homes, with only a marginal difference in space requirements.
- The build costs are not prohibitive and can be as little as £520 per property⁷.
- The design makes it cheaper and easier to adapt if the needs of the household changes, providing better value for money and increased sustainability over time.
- It creates a level playing field for all housing developers to deliver homes on an equal footing.

Until this national mandatory baseline is achieved:

- We would urge the Secretary of State to issue detailed guidance to Local Planning Authorities on how they should reflect the housing needs of older and disabled people in their plans (as required by the Neighbourhood Planning Act 2017)⁸.

For the Planning Inspectorate

- We are calling on the Planning Inspectorate to challenge any Local Planning Authority if their plan fails to set specific requirements for the delivery of a proportion of all new homes to meet M4(2) Category 2 and M4(3) Category 3 standards.

For Local Planning Authorities

- We strongly encourage Local Planning Authorities to be thorough and proactive in planning for the housing needs of older and disabled people. To increase the number of accessible homes they need to establish clear requirements for a proportion of all new housing to be built to the optional access standards set down in Building Regulations and specifically name M4(2) Category 2 and M4(3) Category 3 standards in their plans.

3 key actions

Recognising that planning resources may be stretched, we recommend that Local Planning Authorities take the following actions:

1. Make use of the supportive toolkit for planning accessible homes published by EHRC in 2018.
2. Review the wording of accessible housing policies to ensure that they refer to the correct standards and that policy wording is robust with clear percentages expected of each type of accessible home.
3. Take steps to monitor delivery of new accessible homes collecting data from planning approvals and/or building control systems. This will help them track the impact of their policy, make it easier to evidence demand in future and may support national government to monitor the impact of the national policy framework on delivery of accessible homes.



An M4(2) Category 2 family sized dwelling

Introduction

England is in dire need of more housing. The government has responded with a variety of initiatives aiming to increase and speed up supply, with the ambitious aim of delivering 300,000 new homes per year⁹.

However, as our population ages and rates of disability increase, it is clear that to meet housing needs adequately, both now and in the future, it is vital that we ensure the accessibility and adaptability of new homes. Without this disabled and older people will be increasingly excluded from ordinary aspects of daily living with negative consequences for individuals, families, communities and public services.

At present only 7% of homes in England provide the four basic accessibility criteria to be deemed 'visitable' according to the English Housing Survey¹⁰. Yet there are 13.9 disabled people in the UK, with numbers continuing to rise. The NHS estimates there are 1.2m wheelchair users in the UK¹¹. Failing to address the deficit in the number of accessible and adaptable homes would mean storing up a housing crisis of a different kind if the new homes we build are not able to meet the needs of the population. This report builds a picture of the extent to which Local Plans in

England are set to deliver homes fit for the future. Habinteg believes that the accessibility and adaptability of new homes is a critical strategic issue.

Accessible and adaptable homes – such as those delivered by the M4(2) Category 2 standard can help alleviate pressures on health and social care services and budgets. They can help speed up hospital discharge, enable greater independence at home and make adaptations faster and more economical when they are required.

For example, among the features of an M4(2) Category 2 home are stronger bathroom walls which make the addition of grab rails easier and stairs that can easily accommodate a stair lift. As well as adapting easily M4(2) Category 2 homes accommodate a wide range of people better.

Features such as level access and an easier to use entrance level WC benefit many people including families with young children or older or disabled visitors. As such they can support community cohesion and intergenerational contact, helping to combat isolation and enhance wellbeing.

Equally critical for people who need them is a sufficient supply of wheelchair accessible homes. One impact highlighted through Habinteg's 2016 research report commissioned in partnership with the Papworth Trust, *The Hidden Housing Market* was that disabled people of working age who have their accessible housing needs met are four times more likely to be in work than those who do not¹². We know from talking to our tenants and other wheelchair users how the availability of suitable housing in the right location is a key factor of their ability to secure and maintain employment.

Having a space to live that meets one's individual needs is fundamental to a self-determined life, full participation in society and fulfilment of ambitions.

Since 2004 the Greater London Authority has had a policy requiring all new homes to offer higher levels of access. All London boroughs are expected to have Local Plans in general conformity with the London Plan which requires 90% of all new homes to meet M4(2) accessible, adaptable standards, with the remaining 10% to M4(3) wheelchair user dwelling standard. This policy was adopted in recognition of the huge deficit of accessible housing in the capital.

The vast majority of homes in England today were built before any accessible design standards were introduced. It is imperative, therefore to take the opportunity to ensure the accessibility of new homes country wide in order to come close to meeting the needs of the future.

Christopher's story

"In 1986 I suffered an injury to my left leg whilst hill walking and rock climbing. Over the next 13 years the overall condition of my leg deteriorated making climbing stairs a problem. At the time, our children were still at home and the Council did not have a large enough property to suit my medical requirements plus my family, so we were transferred to Habinteg and offered a property in Oldbrook. I now use an electric wheelchair.

For me, accessible housing is not just about whether or not the wheelchair can fit through the front door but everything inside the property should be accessible: toilets, cupboards, surfaces, baths and showers. Corridors and doorways also need to be manageable.

The layout of my Habinteg bungalow takes all these features into account. This makes a great deal of difference to my day. My bungalow is in an area where people are sympathetic to people having disabilities. The immediate area houses both disabled and able bodied people."

Christopher Hicken
Milton Keynes

“...everything inside the property should be accessible: toilets, cupboards, surfaces, baths and showers.”



Methodology

Local Plans are strategic documents set out by every planning authority describing, among other things, the types of homes that need to be built and where. Policies that require a proportion of new homes to be built to Building Regulations (Part M4 Volume 1: M4(2) Category 2, or M4(3) Category 3) the 'optional technical standards' must be supported by evidence of need in the planning area. The plan as a whole must be shown to be viable in order to be judged sound by the Planning Inspectorate prior to adoption.

Between January and April 2019 Habinteg assessed all 322 Local Plans from Local Planning Authorities across England. The overall approach was to identify and analyse data available in published Local Plans relating to planning policies for accessible homes and to use this data to estimate the trajectory for delivery of accessible housing from 2019-2030.

Best efforts were used to identify the most recent versions of Local Plans, and in order to deliver analysis that represents a best case scenario, draft plans as well as adopted plans were included in the analysis where identified.

Data capture and analysis focused on references to and requirements set to deliver homes using either superseded Lifetime Homes Standard and Wheelchair Housing Design standards, or the current Building Regulations Part M4 Volume 1 M4(2) Category 2 or M4(3) Category 3 – referred to as M4(2) or M4(3) in this report.

Step 1

Each identified Local Plan or draft Local Plan was interrogated using the Find/Search function using key words that included:

- Accessible, accessibility, adaptable
- Disabled, disability
- Elderly, older,
- Housing delivery, housing trajectory
- Lifetime Homes
- M4(2), Category 2
- M4(3), Category 3
- Part M
- Per annum, plan period
- Wheelchair Housing

Step 2

Having identified the relevant sections of the document, the following details were recorded:

- Date of the document/URL link
- Status of document (i.e. adopted or draft document)
- Requirements for or mentions of Lifetime Homes, Wheelchair Housing Design standards, M4(2) or M4(3)
- Percentage of homes required to have access standards, where provided, and to which type of housing the policy applies if specified
- Overall number of homes expected to be delivered over the plan period and per annum.

Step 3

Our calculations established an average annual delivery rate of new homes to estimate how many homes would be delivered by each plan between 2019-2030 (11 years delivery), and of these how many would be delivered to accessible standards if the plan was fully implemented. The calculation used is set out below:

$$\frac{\text{Number of homes due to be built within the plan period}}{\text{Duration of the plan period (Years)}} \times 11 \times \text{\% per access standard applied in plan} = \text{number of homes forecast to be delivered in that category by 2019-2030}$$

NB: If a plan had individual accessibility requirements for particular tenure types eg market housing or affordable housing the figures were calculated separately based on the planned delivery in each tenure multiplied by the applicable percentage set down in the plan.

Step 4

Additional calculations were undertaken to demonstrate the overall proportion in each region of new homes that would be developed to accessible standards by 2030. The delivery rate was also expressed in comparison to the size of population¹¹ in each area, providing a ratio used to compare ambitions between regions.

Assumptions

- If a plan period expired before 2030 it was assumed that the minimum number of homes built after that date, would at the very least be the same going forward. E.G. if a plan period was dated 2011-2026 the average annual delivery rate across the plan period would be used to generate an estimation of total delivery by 2030.
- Where an accessible housing category was restricted to developments of a minimum size we have assumed for the purposes of our calculation that all homes delivered by the plan would be in developments of the required size to be covered by the policy requirement.
- Where a policy provides a caveat regarding application of accessible housing standards, for example that they are only required where there is no flood risk, our application of the 'best case scenario' principle means that we assumed all new homes would avoid the caveated definition and all planned homes would be delivered to the required standard.
- Local plans in the Greater London Authority (GLA) area are analysed according to the way they are written. We have not calculated delivery on the basis of 'general conformity' (see p13).

James' story

"I'd wanted to get on the property ladder for a while – private rent is costly and owning your home provides more security, as well as a more individualised environment that is specific for your needs.

Finding information on shared ownership for disabled people was incredibly difficult. There is very limited information and support available. After weeks of online researching I found some information describing a scheme called HOLD, a government backed scheme for people with a long-term disability to share in the ownership of their home with a housing association by buying a property on the open market.

While I'm thankful this scheme has helped me get onto the property ladder, I also wish there was more support and information readily available. I also believe that the lack of accessible cat 2 and cat 3 housing stock deeply exacerbates the problem and needs to be urgently addressed by the government and housing sector."

James Lee
London

“Finding information on shared ownership for disabled people was incredibly difficult.”



Findings

How many Local Plans require accessible homes?

Less than a third of the local plans analysed set out a requirement to use current accessible housing standards.

During this study 322 draft and adopted local plans were identified and reviewed. The analysis shows that:

- **Less than half of all plans (138) set a specific requirement** for a proportion of new homes to meet any form of accessible housing standards.
- **Less than a third (96) of all plans** set requirements for a proportion of new homes to be constructed to the M4(2) or M4(3) standards.
- **Less than a fifth (56) of all plans** set a requirement for a proportion of new homes to be constructed to M4(3) Wheelchair user dwelling standard.
- **Of the 138 plans that set requirements in England almost a third, (42 plans)** specify standards for accessible housing that have now been superseded for planning purposes.

Compared to the national picture some regions have a higher proportion of local plans with requirements for accessible homes whilst in other areas local plans lacked the specific requirements to accomplish their stated aims for creating accessible and adaptable places to live.

The Greater London Authority (GLA) has had policy requirements for accessible housing since 2004, with which each borough's local plan is expected to be in general conformity. Consequently Greater London has the highest proportion of local plans that specify requirements for accessible housing standards. However not all local plans in the GLA area referred to the current M4 standards and clearly spelled out requirements in their planning policies.

Outside London 110 plans (38%) set policy requirements for accessible standards (of older or current standards). The region with the highest number is the East of England where 27 of its 47 local plans require accessibility standards to be delivered in a proportion of new homes.

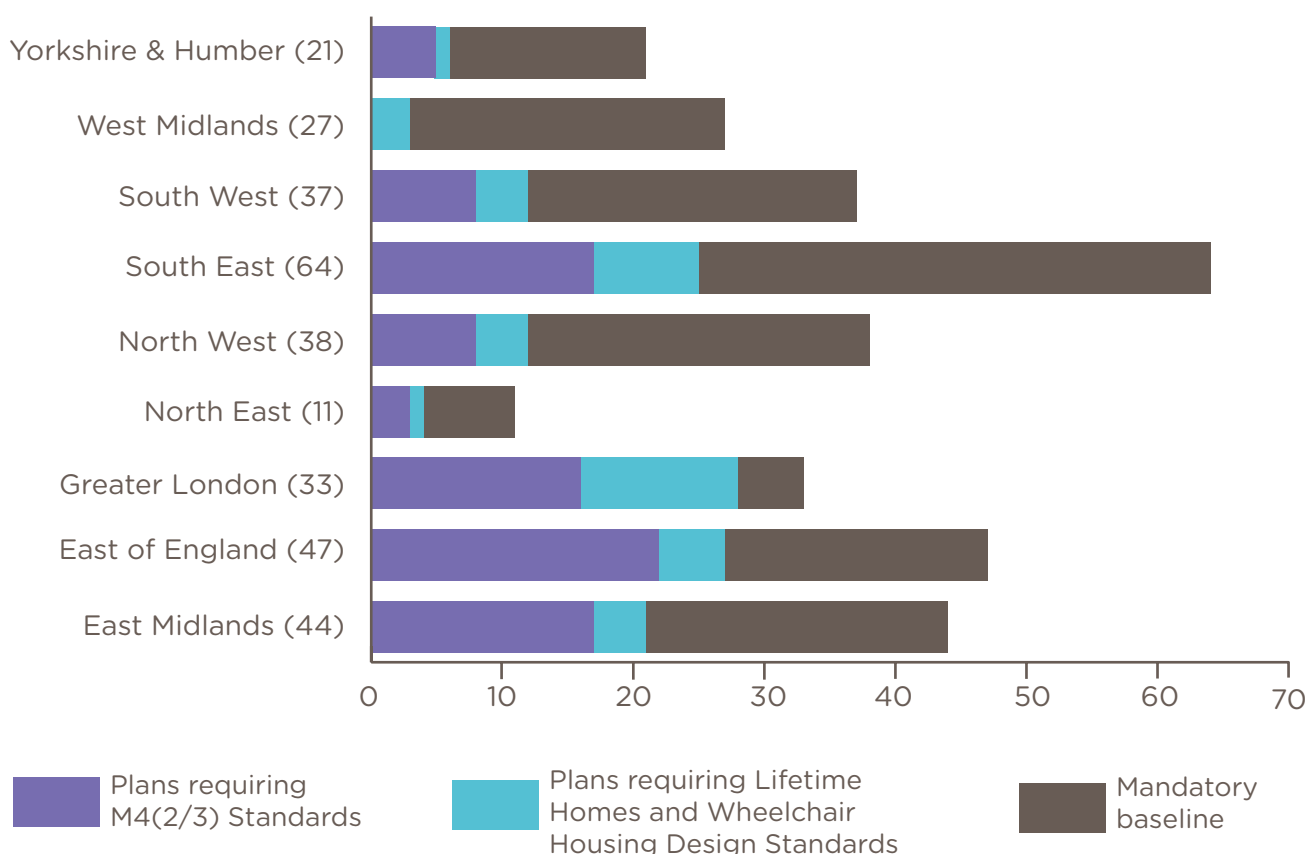
In the West Midlands, a much lower level of just over one in ten plans set specific requirements on accessibility.



Since 2015 plans have been required to refer to the optional standards set out in Part M4 Volume 1 of Building Regulations. The East of England and the North East regions have the highest proportion of local plans with

requirements for homes to be delivered to the 2015 Building Regulations standards. In both regions 45% of the plans set out requirements for M4(2) and M4(3) homes.

Fig. 1. extent of references and commitment to accessibility in Local Plans by region



Plan production and the impact of timing

A significant proportion, 42 (13%) of Local Plans nationally retain requirements to the Lifetime Homes standard and/or Wheelchair Housing Design standards which have now been superseded by Building Regulations Part M Volume 1. Some of these plans have not been updated since the new regulations were introduced.

Of the 322 plans reviewed, 101 (31%) have been adopted after October 2015 when the optional access standards were introduced. A further 80 (25%) are in draft waiting adoption. Of these 181 Local Plans, 81 (25%) have no policy

requirement for a proportion of new homes to meet accessible housing standards. Whilst 95 (30%) set requirements for the current Building Regulations, five (2.8%) set requirements to deliver homes to the older standards.

This is significant as any planning conditions put on a new development that refer to anything other than the M4 standards could be open to challenge¹³ as Government guidance is clear that only the M4 standards should be specified in plans (see p5).

Findings

The forecast for accessible homes

The proportion of new homes that, in the best case scenario, would be built to any accessible standard by 2030 if local plans are delivered varies widely across the country.

Less than one in six (15%) new homes outside London are set to be delivered to the current M4 accessible and adaptable or wheelchair user dwelling standard. A further 8% are specified to the older Lifetime Homes standard.

Accessible and adaptable M4(2) homes

- Outside London a total of 289,616 (14%) of new homes are planned to meet the M4(2) standard equating to a delivery rate of one for every 162 people in the population.

- If homes specified to the Lifetime Homes standard are delivered to M4(2) in line with transitional arrangements, a further 159,758 homes would be built to accessible adaptable

standards. This would bring total delivery to 449,347 or one home per 104 people in the population.

- Taking England as a whole the impact of the London Plan requirements bolsters the forecast with some 776,608 homes specified to M4(2) or Lifetime homes across the country or one for every 72 people.

Wheelchair user M4(3) dwellings

- Outside London just 20,159 or 1% of all new homes are set to meet the accommodation needs of wheelchair users equating to one home per 2,321 people.

- A further 1012 homes outside the capital are specified to meet an older wheelchair housing design standard. If these are developed to M4(3) standards in line with

transitional arrangements, the total delivery outside London would be 21,171 or one accessible home for every 2,210 people.

- Taking England as a whole including London plans, 57,531 or 2.4% of new homes are planned to meet wheelchair dwelling standards equating to one home for every 903 people.

This estimated future delivery of accessible homes stands in contrast to housing delivery ambitions in general. If the total housing trajectory detailed in local plans is fulfilled, by 2030 there will have been one new home built for every 23 people in England.

Table 1. Accessible homes specified for construction by 2030 in Local Plans referring to pre and post 2015 standards

	Older standards	2015 building regulations standards
Accessible and adaptable standards	Lifetime Homes 280,914	M4 Category 2 495,694
Homes to meet the needs of wheelchair users	Wheelchair Housing Design Standard Homes 14,474	M4 Category 3 43,057

Regional variations

Outside of London, policy requirements in the East of England plans would result in the highest proportion of new homes meeting accessible standards. The combined impact of plans across the region would see 88,391 (28%) of new homes built to M4(2) standard and a further 25,095 (8%) to Lifetime Homes Standard. This would mean one accessible, adaptable new home for every 54 people in the region.

Wheelchair accessible housing requirements in the East of England plans are set to result in 4477 new properties to meet the needs of

wheelchair users. The vast majority of these are specified to M4(3) standards with just 645 referring to standards.

At the other end of the spectrum plans reviewed for the West Midlands region indicate the most modest requirement for accessibility of new homes with only 21,725 (10%) accessible adaptable homes planned, referring only to the Lifetime Homes standard. The research team were unable to identify any plans in the region with policy requirements for the current Building Regulations or wheelchair accessible standards.

Plan production and timing

Of the 322 plans reviewed 101 were adopted after October 2015, when the optional access standards were introduced, and a further 80 are in draft stage awaiting adoption. Of these 181 local plans, 47 (26%) have no mention of

any accessible housing standards. A further 20 refer to the older standards whilst five set requirements to deliver homes to those older standards.

Fig. 2. Local plans adoption

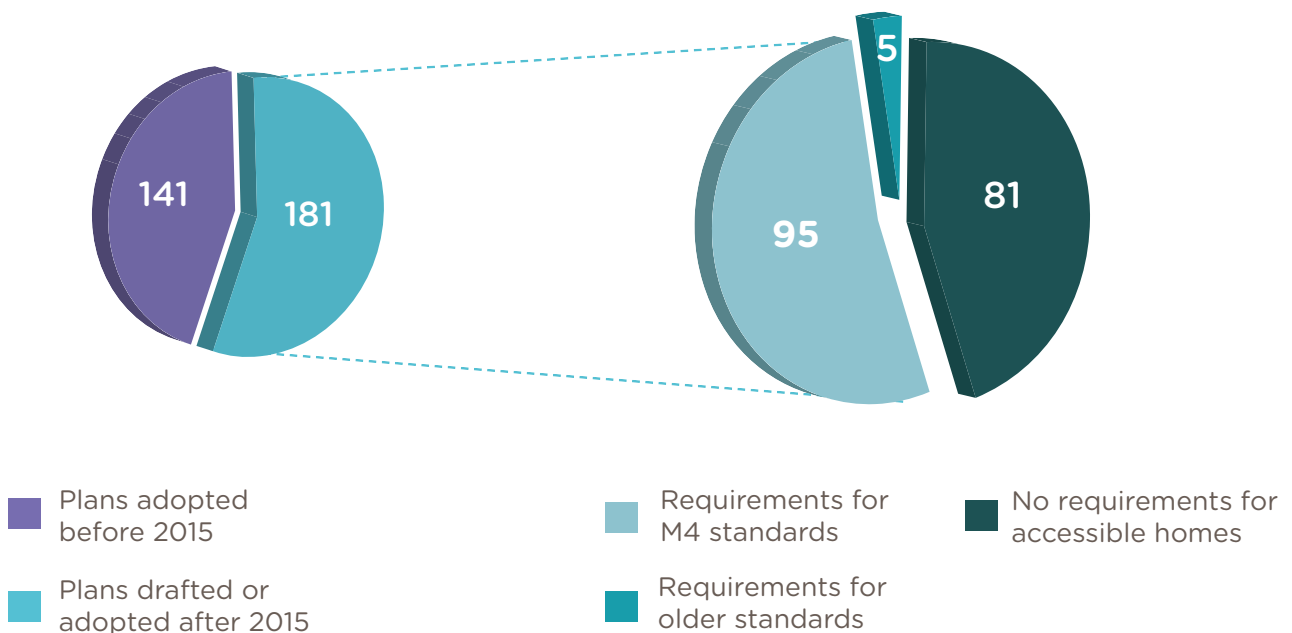


Fig 3. Best case scenario build rates in each housing category by 2030

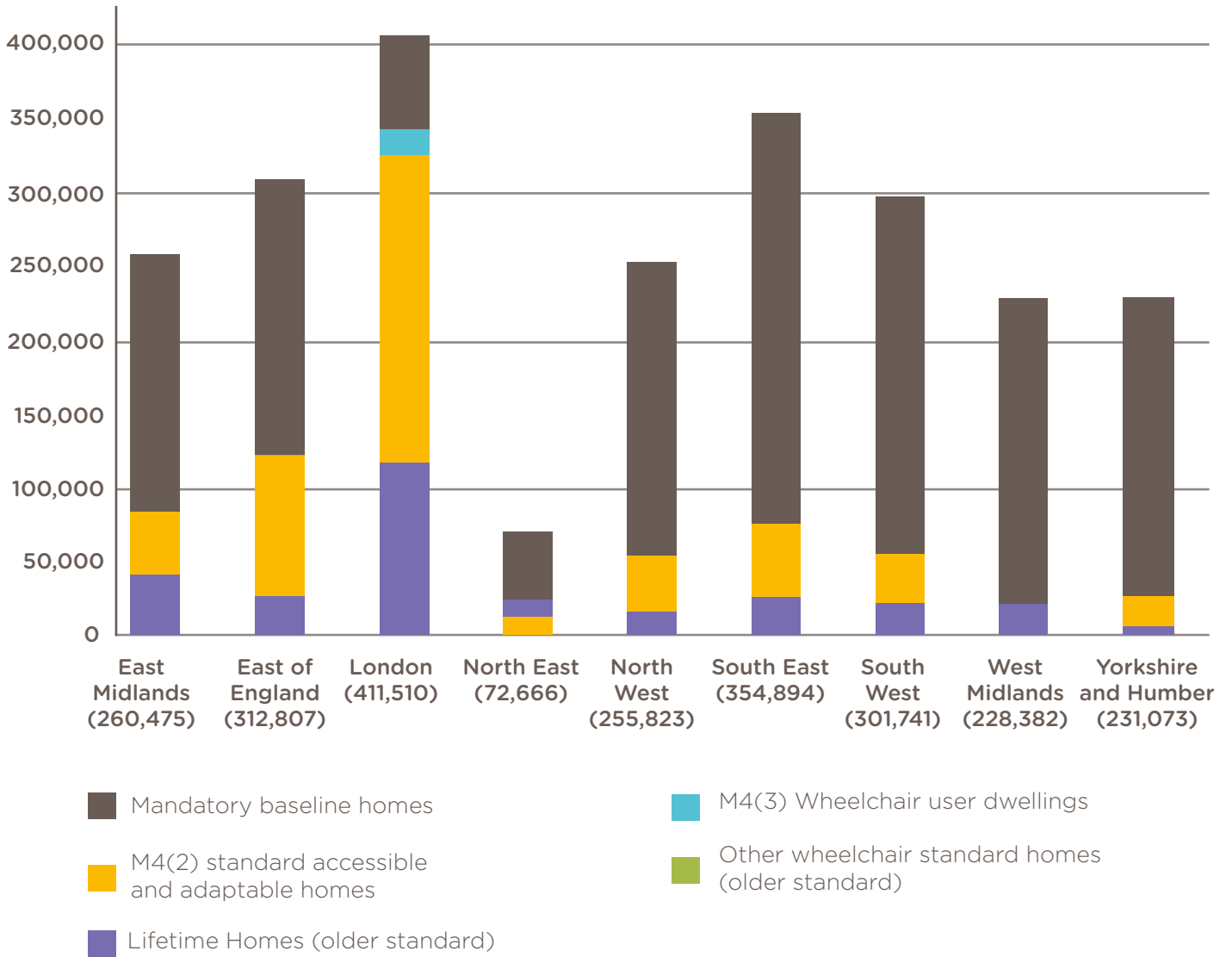
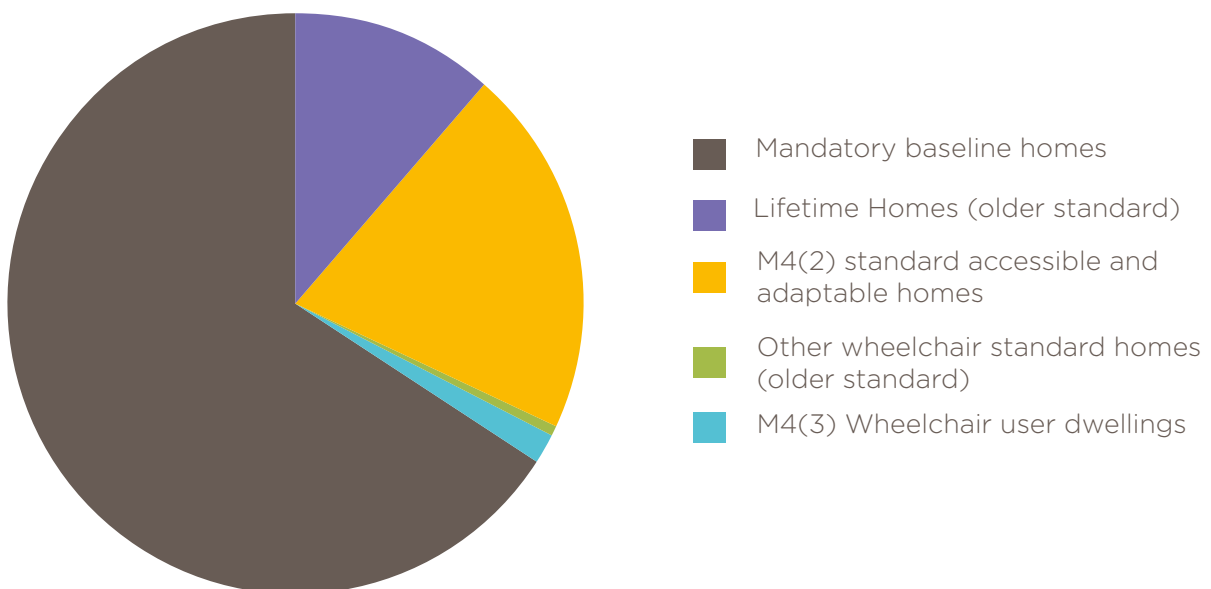


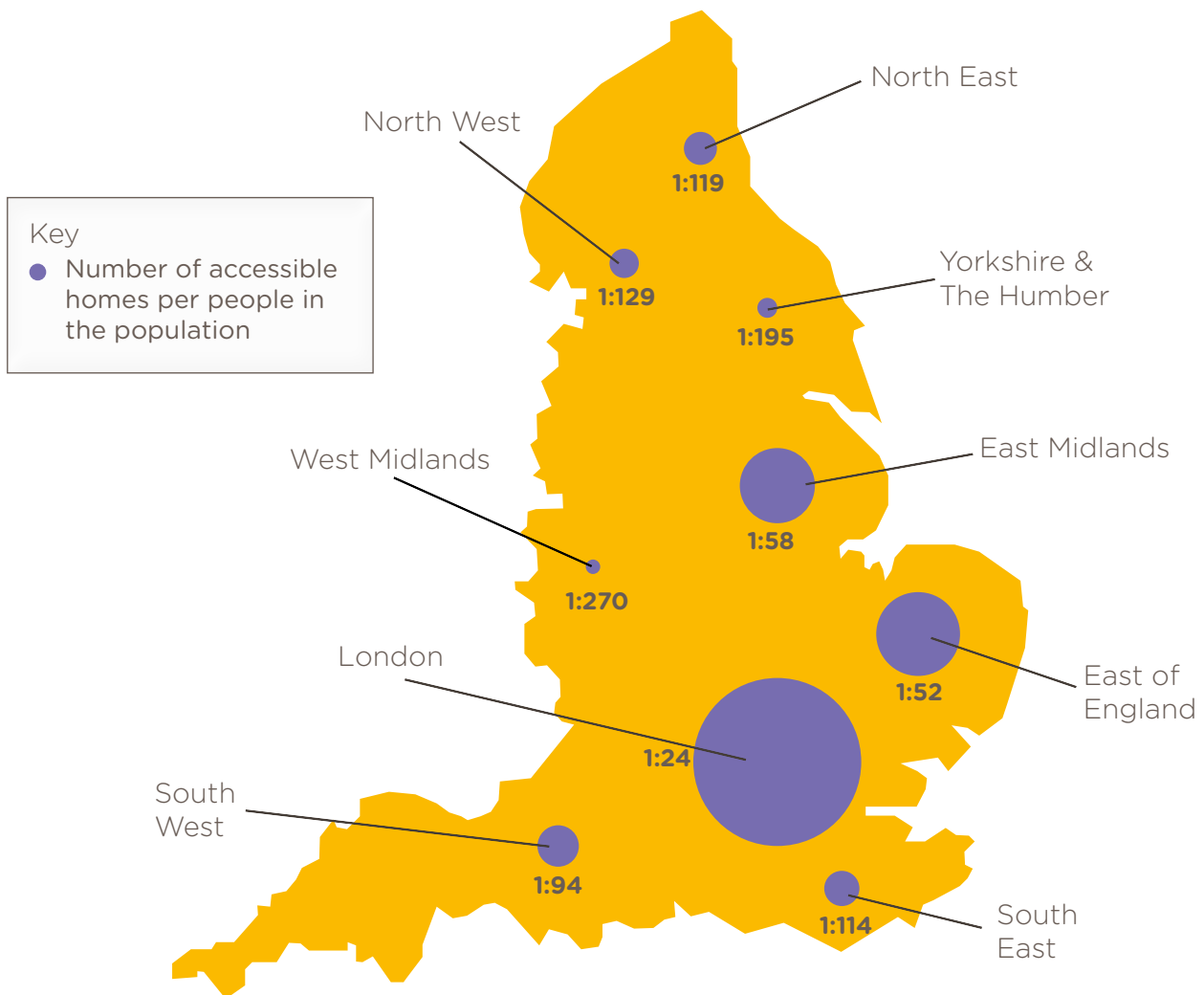
Fig. 4. Total new home delivery in England by accessible housing standard



What does this mean for people looking for accessible new homes?

- In London the numerical chances of finding a new home of either accessible and adaptable standard or wheelchair dwelling standard is the highest, with one new accessible home for every 24 people in the population.
 - In the region with the next highest requirements – the East of England, there is one new accessible homes for every 52 people in the population.
 - In the region with the lowest levels of requirements, the West Midlands, local plans demand just one new accessible home for every 270 people in the population.
- If all local plans come to fruition, people looking for an accessible home will find 11 times more new homes in London are built to an accessible standard than in the West Midlands.

Fig. 5. Extent of references and commitment to accessibility in local plans by region



The variation in supply of accessible, adaptable homes and wheelchair user dwellings is likely to result in regional inequalities of availability of accessible homes. The impact of people ‘making do’ living in unsuitable homes will include unnecessary pressure on health and

social care services as our ageing population will continue to find it difficult to remain living independently at home. In the case of wheelchair users it will perpetuate the severe difficulties many find in identifying and securing a suitable property.

What does a good policy look like?

The National Planning Policy Framework (NPPF) requires Local Planning Authorities to gather evidence to support planning policy for accessible housing. The policy must also be demonstrated to be financially viable when taken in conjunction with all other planning policies set out in the local plan. A test of soundness is completed as part of the Planning Inspectorate examination prior to plan adoption.

To result in delivery of accessible homes a local plan should clearly state what proportion of new dwellings should be built to each of the optional access standards. They should only require standards set out in Building Regulations Part M Volume 1.

Some authorities focus their requirements on a particular market segment in which case that also needs to be clear.

For example, the policy wordings below were both identified during the research process.

Daventry District Council (*emerging draft consultation*)

Policy H07 – Housing mix and type – housing standards

To meet needs of the District's residents and to deliver dwellings which are capable of meeting peoples' changing circumstances over their lifetime the following standards will need to be met:

i) 50% of all dwellings will be built to accessibility standards as follows:

- Market dwellings – 45% to M4(2) and a further 5% to M4(3)
- Affordable dwellings – 40% to M4(2) and a further 10% to M4(3)

ii) It would be expected that these standards will be implemented proportionately across the housing sizes identified in parts B and C of this policy.

Leeds City Council *(core strategy selective review publication draft)*

Policy H10 - Accessible housing standards

New build residential developments should include the following proportions of accessible dwellings:

- 30% of dwellings meet the requirements of M4(2) volume 1 of Part M of the Building Regulations 'accessible and adaptable dwellings'.
- 2% dwellings meet the requirement of M4(3) of Part M volume 1 of the Building Regulations 'wheelchair user dwellings', wheelchair adaptable or accessible dwellings.

Any requirement above 0.5 would require a single dwelling for both M4(2) and M4(3).

Where the scale of development would generate more than one accessible dwelling, the mix of sizes, types and tenures of accessible housing should reflect the mix of sizes, types and tenures of the development as a whole as closely as possible (unless there is evidenced need for additional accessible housing in one particular tenure).

The required number and mix of accessible dwellings should be clearly illustrated on drawings and via planning condition.

Key challenges

Key challenges for accessible housing policy development

- **Lack of national policy emphasis**
The NPPF sets the national policy context for the local planning process. In its 2018 revision, references to the housing needs of disabled and older people were reduced to one statement. Paragraph 61 states that “...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).” The document does not reinforce that Local Planning Authorities should specify delivery of accessible homes through planning policy requirements to build M4(2) and M4(3) homes.

- **Demonstrating evidence of need**
Gathering evidence of need on which to base local plan policies can be challenging. The Equality and Human Rights Commission (EHRC)’s 2018 Report *Housing and Disabled People: Britain’s Hidden Crisis* found that many local authorities lacked confidence in their data, with only 12% of authorities rating the data available to them as good or very good.¹⁴

It can be argued that since the M4(2) standard provides benefits to all types of households that it should simply become the regulatory baseline standard. This would focus the requirement for detailed proof of need in each local plan area on assessing

demand for wheelchair user dwellings. Since no single data source provides a comprehensive picture of need for wheelchair accessible housing building a robust estimate takes time and a collaborative approach that not all planning teams have the capacity to deliver.

- **Lack of resources**
Planning departments are severely stretched. Research published in 2018 by the Royal Town Planning Institute shows that “There have been significant reductions in Local Planning Authority budgets and staffing since 2010, with a third fewer planning staff overall, including a decrease on average of 37 per cent in planning policy staff...”¹⁵ As well as planning teams the role of access officers which may previously have supported plan development, is increasingly rare due to cost pressures.
- **Viability testing**
The viability of a local plan is based on any development it describes generating a financial return to developers and land owners sufficient to see the development delivered. The viability test applied to local plans can have a negative impact on accessible homes policies due to a perception that they are more costly to build. In reality an M4(2) home can be developed at a very modest additional cost compared to the regulatory baseline standard.¹⁸ Moreover the cost benefits of providing a suitable home for a wheelchair user can be significant compared to the alternative and often accrue directly to the local authority.

Recommendations

Having reviewed our findings and taken account of the challenges faced by Local Planning Authorities Habinteg are calling for action at both a national and local level.

- We are calling on Government to make M4(2) Category 2 the mandatory baseline for all new housing, and for planning authorities to ensure an adequate number of wheelchair accessible properties. Local Planning Authorities are built to meet needs in their area. This policy has been in place since 2004 in London and should be rolled out nationally.

Until this national mandatory baseline is achieved:

- We would urge the Secretary of State to issue detailed guidance to Local Planning Authorities on how they should reflect the housing needs of older and disabled people in their plans (as required by the Neighbourhood Planning Act 2017).
- We are calling on the Planning Inspectorate to challenge any Local Planning Authority if their plan fails to set specific requirements for the delivery of a proportion of all new homes to meet M4(2) Category 2 and M4(3) Category 3 standards.
- We strongly encourage Local Planning Authorities to be thorough and proactive in planning for the housing needs of older and disabled people. To increase the number of accessible homes they need to

establish clear requirements for a proportion of all new housing to be built to the Building Regulations optional access standards and specifically name M4(2) and M4(3) standards in their plans.

Recognising that planning resources may be stretched we recommend three key actions that Local Planning Authorities can take:

1. Make use of the supportive toolkit for planning accessible homes published by EHRC and Habinteg in 2018
2. Review the wording of accessible housing policies to ensure that they refer to the current standards and that policy wording is robust, stating clear percentages for each type of accessible home
3. Take steps to monitor delivery of new accessible homes collecting data from planning approvals and/or building control systems. This will help track the impact of local plan policy, will make it easier to evidence need in future and may support national government to monitor the impact of the national policy on delivery of accessible homes.

What you can do

If you are involved in developing a local plan:

- Make use of the [strategic planning toolkit](#) developed and published by Habinteg and EHRC in 2018. It contains ideas and tips for researching need in your area as well as information on the cost benefits of accessible homes
- Get in touch with Habinteg's technical consultancy team - the Centre for Accessible Environments - who offer a range of training on housing standards and their practical application.

If you are an MP or local councillor:

- Get in touch with Habinteg to find out more about our #ForAccessibleHomes campaign
- We encourage MPs to write to the MHCLG - as well as their Local Planning Authority - enclosing a copy of this report
- We encourage councillors to write to the cabinet member for housing, enclosing a copy of this report
- Sign up for updates on accessible homes policy at www.habinteg.org/enews

If you want to push for more accessible homes in your area:

- Contact your Local Planning Authority for a copy of the most up to date local plan.
 - If it is still in development you may be able to take part in consultation
 - If it's already adopted but doesn't mention accessible housing, contact the council's cabinet member for housing. They may be able to raise the issue with the planning department to ensure that when the plan is revised accessible homes can be included.
- Write to your local MP and local councillor, enclosing a copy of this report and request that they take action
- Visit www.habinteg.org/enews to join Habinteg's mailing list and hear about good practice, policy developments and campaign opportunities
- If you have a story to tell about the difficulty finding an accessible home, we would love to hear from you.



Endnotes and references

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- ⁵ HM Government Guidance (2015) *Accessibility and wheelchair housing standards*, .Gov.UK <https://www.gov.uk/guidance/housing-optional-technical-standards#accessibility-and-wheelchair-housing-standards>
- ⁶ HM Government Written statement to Parliament (2015) *Planning Update March 2015*.Gov.UK <https://www.gov.uk/government/speeches/planning-update-march-2015>
- ⁷ EC Harris Built Asset Consultancy (2014): *Housing Standards Review Cost Impacts Department for Communities and Local Government* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/353387/021c_Cost_Report_11th_Sept_2014_FINAL.pdf
- ⁸ *Neighbourhood Planning Act (2017)* http://www.legislation.gov.uk/ukpga/2017/20/pdfs/ukpga_20170020_en.pdf
- ⁹ BBC News (2017) *Budget 2017: Plans to build 300,000 homes a year* <https://www.bbc.co.uk/news/business-42043084>
- ¹⁰ Department for Communities and Local Government *English Housing Survey: Adaptations and Accessibility Report, 2014-2015* <https://www.gov.uk/government/statistics/english-housing-survey-2014-to-2015-adaptations-and-accessibility-of-homes-report>
- ¹¹ NHS England, *Improving Wheelchair Services* <https://www.england.nhs.uk/wheelchair-services/>
- ¹² Habinteg and Papworth Trust (2016) *Hidden Housing Market* <https://www.habinteg.org.uk/search/text-content/the-hidden-housing-market-a-new-perspective-on-the-market-case-for-accessible-homes-1043>
- ¹³ Alton Herald *Incredulity meets standards decision*, 21 November 2016 <http://www.altonherald.com/article.cfm?id=114872&headline=Incredulity%20meets%20standards%20decision§ion=news&searchyear=2016>
- ¹⁴ EHRC (2018) *Housing and disabled people, Britain's Hidden Crisis*, EHRC <https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-local-authorities-toolkit-england-planning-accessible-homes.pdf>
- ¹⁵ Royal Town Planning Institute (2018) *Investing in Delivery* <https://www.rtpi.org.uk/investingindelivery>