

Housing Standards Review: summary *draft* response to consultation

Habinteg's mission is to champion inclusive housing and we have promoted both Lifetime Homes Standards and our Wheelchair Housing Design standard since their inceptions. On this basis, we have been involved in the Housing Standards Review convened by the Department for Communities and Local Government (DCLG).

This summary sets out the main points of Habinteg's initial response to the Housing Standards consultation published by DCLG in August 2013. The proposals for consultation describe a tiered approach to access standards ranging from Level 1 – broadly equivalent to current requirements of building regulations (Part M), to Level 2 offering an 'intermediate access standard' - comparable to the existing Lifetime Homes Standard and Level 3 which provides for wheelchair accessible and wheelchair adaptable housing.

1. Access needs upfront investment and prioritisation

Demographic realities demand that new homes meet the future needs of our population, one aspect of which is increasing numbers of older people living with impairments or long term health conditions. We also know that there is significant unmet need for wheelchair accessible housing across the country, calculated in 2008 to be around 78,000 households. Specialist housing provision alone cannot meet these demands.

It is critical that more homes are built that can adapt to the variety of changing needs that we all have over our lifetime, and provide for the needs of wheelchair users. Accessible, adaptable housing is not a niche product or 'nice to have' but an effective general solution that increases flexibility, reduces the need for costly adaptations, cuts the risk of falls and enables independent, productive living. We want new homes to be built to accessible flexible standards from the outset in order to address future housing need in the most cost effective way. The provisions of Part M that make homes 'visitable' will not go far enough to meet future demand. **Accessible, flexible housing (i.e. Level 2 or standard similar to Lifetime Homes) should be required as the default option for new housing, with the onus on housing authorities to demonstrate – through development of their local plans - where and why it is not needed or possible.**

2. Standards and regulation

We welcome efforts to make access standards simpler for builders to deliver. However regulation and enforcement is critical to back up any new standards if they are to lead to an increase in accessible housing stock. **We want to see the Level 2 standards (subject to our proposed amendments) adopted by local authorities as their default standard for new homes across all tenures, integrated to and enforced by Building Regulations - provided that the process of integration does not compromise the specification.** Prompt integration to Building Regulations would both support good practice and address poor practice, and could be extended to cover the immediate occupancy Wheelchair Standard as part of the proposed tiered approach, supported by an expectation that 10% of homes being built to the Level 3 standard.

3. Cost benefits and viability

The consultation document puts emphasis on costs and viability. In terms of costs it focuses, worryingly, on build and process costs whilst viability testing refers to the terms set in the National Planning Policy Framework. The impact assessment estimates that a two bed house would cost an additional £451 to build using the proposed new Level 2 standard, taking into account build costs and architects time. This investment can be seen as a good value option when potential savings are considered. For example, a reduction in the number of fractures sustained at home due to poor accessibility - in 2000 the costs to the NHS of hip fractures alone ran to £726 million.

There is scant consideration in the consultation document of likely savings in health, social care and housing adaptations. Societal benefits accrued by supporting independence, employment and the overall physical and mental health of older and disabled people are likewise omitted. **We want any costing and viability assessment to take these factors fully into account.** Failure to do so will risk reducing provision to housing that best delivers profit to the developer, rather than the far reaching benefits to the community and individual households which we need.

4. Limitations on practice

We are concerned that the DCLG proposes to restrict local authorities purely to the standards that may arise from the consultation. If the standards are not sufficiently demanding, some local authorities may be forced to drop higher quality solutions that they currently successfully use. The issue of limitation would be particularly obstructive where specific needs arise, such as with people living with dementia, or householders who use larger wheelchairs. It will be important for Local Authorities to have flexibility to commission dwellings with enhanced features to help meet their needs. **We believe that any new national standard should be a minimum requirement, allowing for additional features where needed.**

5. Capping provision

We do not agree with setting a cap on wheelchair standard properties in order to balance viability calculations on local housing plans. We know that there is unmet need for wheelchair housing and the numbers of wheelchair user households are likely to increase. **Local authorities should not be limited to delivering a predetermined amount of wheelchair housing through their local plans. They should be supported to devise their own targets for all tenures, with guidance from government as to how to assess local needs most effectively.**

6. Space

Whilst increased space within a dwelling can make it easier to deliver accessibility features these two design factors are not always intrinsically linked. For example smaller dwellings can be made more accessible with the application of clear accessibility standards, whilst larger ones are not necessarily more accessible unless they do. **We think the case for minimum space standards should be examined in its own right rather than being triggered by implementation of the Level 2 & 3 access standards alone.**

7. Equality impact

The extent to which new homes meet the varied access needs of households has potential consequences for the lives of disabled people, older people and families with young children. Therefore the proposals should be assessed for compliance with Section 149 of the Equality Act. **We would like to see evidence of equality impact of considerations of the proposals published as part of the review.**

8. Feedback on technical specifications

Level 1: ensuring and enhancing visitability

- In our view the level 2 standard should be the default option for all new homes, however if Level 1 were permitted within a development, we note that it allows for a stepped approach as a 'limited exception'. It is critical that such exceptions are tightly managed through application control and quality control procedures in order to keep such cases exceptional. Unless such control mechanisms are put in place we believe that Level 2 approach routes should be the minimum requirement.
- Similarly to ensure maximum visitability of Level 1 dwellings, we want to see an entrance level living space specified to allow not only entry but socialising space for any visitor unable to use steps or stairs.
- In larger Level 1 homes with step free access we would like to see a WC designed to Level 2 specification, further enhancing the visitability for people with a range of access needs. With the Level 1 standard as it is proposed, such homes could be built with a small entrance Level WC that is not accessible to a wheelchair using visitor.

Level 2: safety and practicability

- The new proposals suggest that parking, whether communal or on-plot, can be gently sloping. We have concerns that even a small gradient can make it harder for people with reduced mobility to get in and out of vehicles. Parking should be on level ground.
- Window handles and radiator controls should be positioned at a height that is safe and comfortable for all to use. The new proposals suggests that window handles may be placed up to 1400mm from the floor which would place them above shoulder height for an average wheelchair user, whilst thermostatic radiator valves are exempt from height requirements, meaning that they could be positioned so low as to be inaccessible by wheelchair users and other people with restricted movement.

Level 3: flexibility for a range of occupants

- The Level 3 standards proposed are basic minimum specifications to meet the requirements of independent wheelchair users. However we need much more ergonomic evidence to ensure that the standard stays fit for purpose into the future.
- We must also provide flexibility to housing authorities to provide additional features where occupants need them e.g. people living with dementia, or who use larger wheelchairs

This is a summary of our *initial, draft response* to the DCLG consultation and is subject to change as we continue to listen to the response of the sector. To read our detailed draft responses to the technical and policy consultation visit our website:

www.habinteg.org.uk/responses