A forecast for accessible homes 2025: one decade on, milestone or millstone?





## **Contents**

About this forecast3
Key findings4
Annette's story6
Accessible homes policy context7
Why isn't M4(1) 'visitable' standard good enough?8
Benjamin's story9
Benefits of accessible homes10
Research and analysis approach11
Lorraine's story12
National findings13
Max's story19
Regional findings20
Stuart's story25
Policy opportunities26
Conclusion27
Recommendations28
Sophie's story30
References 31

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## About this forecast

October 2025 marks 10 years since the introduction of two optional accessible housing design standards to Part M of English Building Regulations.

These standards, M4(2), accessible and adaptable homes and M4(3), wheelchair user dwellings, (see p5), will influence the accessibility of new housing only if they are explicitly referenced in housing policies set out in local plans.<sup>i</sup>

Habinteg has set out to track the use of these optional standards in English local plans, having formally published previous Forecasts in 2019 and 2020. This 2025 update is a new snapshot of the use of the optional standards in 311 plans and an estimate of the maximum possible impact on future delivery of new accessible homes over the coming 10 years.

The stories of lived experience in this report show how the availability of the right type of accessible housing, in the right places, affects the day to day lives and wellbeing of disabled people up and down the country.



# Why accessible housing matters

For disabled people, finding a place to live that offers the accessibility, safety and independence they need can be an impossible task. Their housing choices are far fewer than those available to non-disabled people.

England's housing stock is recognised to be the oldest in Europe, the vast majority having been built before accessible and inclusive design was even conceived. Unpublished English Housing Survey data, reported in July 2025 by Centre for Ageing Better, revealed that just 12.6% of English homes are considered even to be 'visitable' in accessibility terms, 87% is inaccessible."

The lack of accessible housing across all tenures takes a toll on disabled people's health and wellbeing as well as their life chances and prospects of employment. The predominance of inaccessible homes also drives demand for costly health and social care services because disabled and older people need more daily support and are more prone to accident and ill-health if their access needs are not met. The value of accessible homes to society is therefore significant, as shown in Habinteg's 2023 report, Living not Existing.

For society to be truly inclusive disabled people must have the opportunity to access appropriate housing. This means we need to increase the availability of accessible homes so that disabled people can secure suitable housing options on an equitable basis.

By monitoring the use of the optional standards, and combining this with planning authorities' stated housing delivery targets, Habinteg has estimated the potential delivery of new accessible homes over the coming decade, identifying both progress and residual risks and inequalities.



1,394,983

M4(2) homes to be built over the coming decade

A rise of

163%



from 2020
when the forecast stood at

530,504

In Greater London



new wheelchair accessible home for every

210 people in the population

In the North West



new wheelchair accessible home for every

2006 people in the

## **Key findings**

In the best case scenario, over the next 10 years, up to 1,501,102 homes are forecast to be built in England to either M4(2) or M4(3) standards, equivalent to one new accessible home for every 38 people in the English population.

 There will be one new M4(2) home for every 41 people and there will be one new M4(3) home for every 538 people in the population.

Planning for M4(3) wheelchair-accessible homes has lagged behind M4(2) accessible and adaptable housing.

- The forecast shows 1,394,983, M4(2) homes could be built in England over the coming decade, that's a rise of 163% from 2020 when the forecast stood at 530,504.
- The forecast shows 106,119 M4(3) homes could be built in England over the coming decade compared to 44,919 in 2020, that's a rise of 136%.

Regional variations in plans for accessible homes are particularly marked in policies for wheelchair accessible properties with a ten-fold difference between the most ambitious and least ambitious region.

- In the Greater London region there will be one new wheelchair accessible home for every 210 people in the population.
- In the North West there will be just one new wheelchair accessible home for every 2006 people in the population.

An increasing number of plans propose to link requirements for a higher proportion of accessible homes to affordable housing tenures. This makes delivery vulnerable to developer negotiations on grounds of viability.

Differentiation of policy between tenures also sees significantly fewer wheelchair standard properties planned for market homes.

- 61 draft plans set different requirements for accessible homes according to affordability.
- Within plans that differentiate, 83.7% of affordable homes are required to meet one of the optional access standards compared to 64.1% of all market homes
- Market homes are expected to deliver just 11,008 wheelchair standard homes compared to 14,649 expected among the affordable delivery.

Draft local plans tend to propose higher requirements for accessible homes than adopted plans.

- 69% of draft plans require a percentage of homes to M4(2) v 65% of adopted plans.
- 56% of draft plans require a percentage of homes to M4(3) v 37% of adopted plans.



83.7%

affordable homes required to meet one of the optional access standards

compared to

64.1%

of all market homes



Market homes are set to deliver just

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# Annette's story

Annette Stuart, 62, lives in Lancashire, Bolton. Annette is a wheelchair user and lives with her partner, who she co-owns her home with. They live in a two-storey unadapted house. Annette is unemployed.

"I'm not on my local council's list for an M4(2) accessible and adaptable home or an M4(3) wheelchair user home. I believe I'd have to sell my own home to be able to rent, or buy, an accessible local authority home.

My current home is not very accessible. It has a ramp to my front room only. Key elements in my current home that would have a great impact on my life are: easier access to another room, like the kitchen; a downstairs toilet and bathroom; a through-floor lift; an upstairs bathroom or wet room.

We have tried to sell this property three times. But as I need two bedrooms, room for me to move around with a powered wheelchair, an accessible bathroom, kitchen and outside area, and ramps have to be factored in, it's difficult.

Honestly, I'm in despair. Affordable accessible homes are just in such short supply.

My partner supports and cares for me, and he has his own health issues. We can't afford a mortgage without selling the property we live in. The average cost of a property is around £350,000.

We'd only get around £219,000 for our home. There's a big shortfall and the majority of properties we've looked at need complete modernisations and adaptations... we feel so trapped."



Honestly, I'm in despair. Affordable accessible homes are just in such short supply.

# Accessible homes policy context

Since October 2015, Building Regulations Part M4 Volume 1 has provided a framework of three technical accessibility standards that can be used in new homes.

- M4(1) Category 1: Visitable dwellings is the mandatory baseline, providing some basic accessibility features (e.g. door widths and corridors of a size suitable for a range of people including wheelchair users).
- M4(2) Category 2: Accessible and adaptable standard is based on to the Lifetime Homes Standard, a flexible and adaptable standard offering enhanced access features such as larger entrance level WC and adaptability benefits such as stronger bathroom walls to easily take grab rails.
- M4(3) Category 3: Wheelchair user dwelling standard specifies accommodation to meet the needs of a household that includes a wheelchair user. It includes two sub-categories:
  - M4(3)(a): wheelchair adaptable (meets spatial and layout requirements but may not have been fully fitted and for immediate use by a wheelchair user)
  - M4(3)(b): wheelchair accessible (a home that is fully ready for occupation by a wheelchair user household, for example with kitchen and bathroom features specifically designed).

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

M4(2) and M4(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 then 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.

Since the 2015 introduction of the optional technical standards, the National Planning Policy Framework (NPPF) has required Planning Authorities to refer only to the Building Regulations M4(2) and M4(3) standards in plan -making for accessible homes. No other standards may be used.

In July 2022 the then government announced its decision to change the regulatory baseline to M4(2) Accessible and adaptable home standard. However, this was not implemented before the general election. At the time of writing, the new administration - having announced a target to build 1.5 million new homes - has not confirmed its plans for implementation.

Since Habinteg's 2020 forecast, revision of many local plans was delayed by the impact of the Covid pandemic and because authorities awaited updates to the NPPF.

With the new government in place, activity on local plans has picked up pace. The results contained in this report indicate that newer plans reflect the direction of travel indicated in the July 2022 announcement, with a notable number effectively requiring M4(2) accessible and adaptable homes as a minimum for all new development.

# Why isn't M4(1) 'visitable' standard good enough?

Unpublished data from the English Housing Survey - reported first in July 2025 by Centre for Ageing Better - suggests that 12.6% of homes are now deemed to be "visitable for most people, including wheelchair users" - up from 9% in the previous assessment published in 2020.

The four features required for a property to be deemed 'visitable' are:

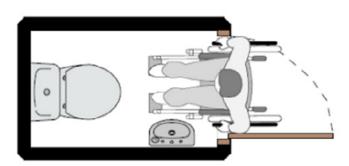
- 1. Step-free access from the street or front gate to the home's main entrance.
- 2. A low or flush entrance at the front door.
- 3. Wide enough doorways and hallways these can still be as narrow as 900mm for hallways and 750mm for doorways - barely more than the width of many wheelchairs, offering little room to turn or manoeuvre.
- 4. An entrance level toilet A toilet must be provided on the entry level of the home, but could be so small that many wheelchair users would be unable to enter and close the door behind them for privacy. (See fig 1).

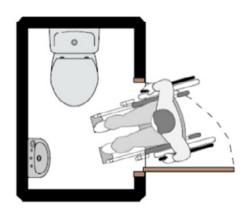
Therefore, while nearly 13% of homes in England offer some basic accessibility features, there is no guarantee that all these homes are truly visitable to all in any meaningful way. Moreover, they lack the adaptability that many households will need over their lifetimes.

M4(2) standard homes have significantly more accessible features and are more realistically liveable as well as truly visitable.

For example, the entrance level WC is large enough to be used independently by a wheelchair user, or for an person to receive assistance if needed. The standard also requires step free thresholds to both main and secondary entrance.

Fig 1. Example layouts of entrance level WC that complies with M4(1) standard.





# Benjamin's story

Benjamin James, 28, lives in South East London. He used to work in healthcare communications, and is now a freelancer and does peer research work for charities supporting the Duchenne Muscular Dystrophy community. He is also studying a part-time distance learning course in Sustainable Development at the School of Oriental and African Studies, in London. Benjamin is a wheelchair user.

"I live with my family in a privately owned flat. I am on my local council's list for an accessible and adaptable home or a wheelchair user home, but I'm unsure of my current status on the list.

While my family home is accessible, the kitchen is difficult, but possible for me to access.

Our flat has been adapted via a Disabled Facilities Grant. I have ramp access to the home and garden, widened doors, a wet-room, overhead hoists and powered/automated front and back doors.

Key elements that would make my current home easier to live in include increased space in the bathroom via an extension to the property, an H-frame hoist in the bedroom and bathroom, and wider doors.

These things would make a difference to my day-to-day life as the flat would have more space, and that would make navigating it in a wheelchair much easier, especially the bathroom. It would make it easier for me to support myself in my day-to-day life, and I wouldn't have to worry about the limited space I have to manoeuvre.

As a younger adult living at home, I don't have the same housing options as my peers. This creates a feeling of exclusion and restricts my ability to live fully independently. It is frustrating to have fewer choices for housing, and living at home requires compromises that make it challenging to maintain independence, particularly when support from others is needed in daily life."



family home is accessible, the kitchen is difficult, but possible for me to access.

## Benefits of accessible homes

Accessible homes provide economic and social benefits to individuals and families, government, local authorities, the NHS, and society in general:

#### 1. Cost effective adaptations:

An M4(2) home offers more liveable space to all, while also future-proofing for the people's changing needs. For example:

- Stairlifts are straight forward to fit to a straight run staircase.
- Bathroom grabrails can be fitted without the need to open and strengthen the wall and make-good.
- In three-bed properties and larger, the downstairs WC is ready fitted with drainage to provide a walk-in shower, should it be required.

# 2. Remove or reduce the cost of care assistance in the home.

Accessible homes reduce the costs of domiciliary care because they are easier to use without support and facilitate more cost-effective adaptations which in turn help people stay independent in their home for longer.

# 3. Reduce demand for permanent esidential care.

Accessible and adaptable homes can delay or eliminate the need for a move to more costly residential settings. Typical annual savings range from £27,000 to £39,000 for basic care home services.

#### 4. Speed up hospital discharges.

Lack of accessible homes delay hospital discharges and put pressure on NHS resources. Accessible housing enables patients to return safely to a suitable environment more easily.

#### 5. Reduce trips and falls in the home.

It is estimated that accessibility needs are affected by falls and require ambulance and hospital assistance each year. Building new wheelchair user homes can limit this risk factor.<sup>vi</sup>

# 6. Reduced welfare benefits and greater contribution to tax and National Insurance.

Disabled people with accessible homes are four times more likely to be employed compared to those without accessible homes.<sup>vii</sup>

#### 7. Higher disposable income.

Having work done to a standard home can be costly for wheelchair users. A wheelchair user home may also require fewer ongoing adaptions, leaving the individual with more income to spend on other aspects of their life.

Habinteg's 2023 Living not Existing report is based on work by the London School of Economics that assessed the cost benefits of wheelchair accessible homes. It found that within a 10-year period the benefits achieved for an M4(3) property, occupied by a working age wheelchair user household, would be £94,000 and for a disabled person of pensionable age, would exceed £100,000.

With England's ageing population and increasing rates of disability, Habinteg believes it is critical to ensure that all new homes are designed, at a minimum, to M4(2) standard in order to harness these benefits to individuals and to release hard-pressed public resources to where they are most needed.

# Research and analysis approach

Between June and July 2025 Habinteg identified and assessed 311 English local plans.

This was 13 fewer than in 2020 due to some authorities electing to create joint local plans to tackle housing, infrastructure, transport, and environmental issues that cross council boundaries, allowing them to share evidence, cut costs, and present a coherent regional strategy. Best efforts were used to identify the most recent versions of local plans, and to create a best-case scenario calculation, draft plans as well as adopted plans were included.

The local plans were scanned using a bespoke AI process to identify policy requirements for M4(2) and M4(3) homes. A 10% quality check was undertaken to verify findings.

Taking a best-case approach, the following rules were used in the analysis:

- Where a local plan specifies 100% M4(2) but also has requirement for M4(3) we have reduced the M4(2) requirement accordingly to avoid double counting homes.
- Where policies apply to developments of a given size, or a specific type of location such as green field, the assumption was made that all homes will be built in developments that meet these criteria.
- Where a condition is applied relating to the type of home, such as 'all new homes with ground floor living accommodation', we have assumed that all new homes in target will meet the requirement.

- Where policies differentiate between affordable homes and market homes (those built for private sale or private rent) the team applied the policy requirement to the number of homes anticipated to be built in each category.
- Where affordable homes' rates differ according to location (i.e. a higher proportion on brownfield land) the calculation of the quantum of affordable homes was based on the assumption that all affordable homes will be built in locations that attract the highest accessible homes requirement.
- Where a draft plan does not designate a target for a housing category, such as affordable homes, and we cannot calculate delivery, the result was zero.
- Where an early draft does not specify an accessible homes policy, we have taken the previous local plan content forward if that has a relevant policy.

As local plan time frames vary, the team calculated the average annual housing delivery target for each plan, using this as the basis for the number of M4(2) and M4(3) homes that could be delivered over the coming decade.

The calculations used were:

Number of homes due to be built within the plan period

Duration of the plan period (Years)

X

M4(2) and M4(3) policies Annual accessible homes average

× 10 :

Ten year accessible homes forecast

# Lorraine's story

Lorraine Stanley, 52, is selfemployed and lives in South West England with her husband and an adult child. She is a wheelchair user.

"I've previously spent years on council housing waiting lists, and have been imminently homeless on at least three occasions. Now I live in a housing association property, which is extremely accessible. It has made it possible for me to stabilise my health enough that I am now self-employed part-time, running my own training consultancy.

My home has been adapted and has a wet room bathroom, and I can get into every room with my wheelchair, as well as my garden. This is amazing because my electric wheelchair is longer from front to back than the majority of wheelchairs.

The property also has an electric front door that I can open by pressing a remote control, and there's a door release entry phone system that means I can check who is at the door before I press the button to open it (I'm mostly bed-based).

Three features in my home that have made the most difference to me are the combination of the door release entry phone system with the remote controlled electric front door; the wet room, and my wheelchair accessible garden (this because I'm mostly house-based).

There is an additional key feature which is not a 'gizmo', but very crucial - I have a secure tenancy, which means I'm no longer at the mercy of private landlords selling my home from underneath me. I'll only need to leave this home if I choose to do so."



This is amazing because my electric wheelchair is longer from front to back than the majority of wheelchairs.

# **National findings**

In 2025 more accessible homes are planned per head of population than in 2020, but 41% of new homes remain planned to the inadequate current baseline.

Over the next 10 years, if all plans are realised and new homes are built under the optimum possible conditions, there will be 1,501,102 new accessible homes built in England to either M4(2) or M4(3) standards, equivalent to one new accessible home for every 38 people in the English population.

There will be one new M4(2) home for every 41 people and there will be one new M4(3) home for every 538 people in the population.

2025

user dwellings (4%)

The number of new M4(2) and M4(3) homes forecast is equivalent to 59.7% of planned housing delivery, leaving at least 40% - over a million new homes - to be built without the accessibility and adaptability features to make them fit for the future.

#### Percentage of accessible homes forecast over 10 years

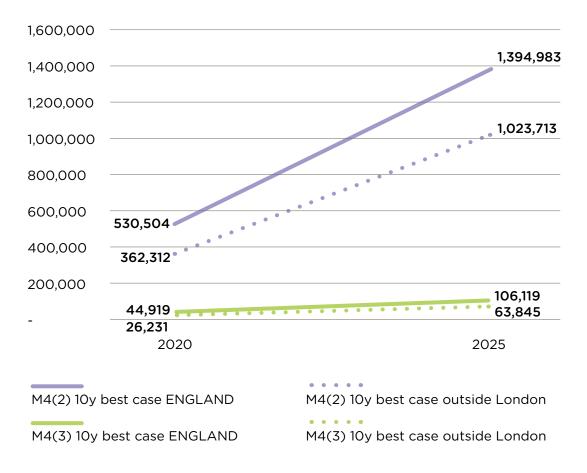
2020

user dwellings (2%)

# M4(1) current baseline / other (41%) M4(2) accessible and adaptable homes (55%) M4(3) wheelchair M4(3) wheelchair M4(3) wheelchair

Over the last five years, the forecast number of wheelchair accessible homes that could be built over the coming decade has grown less than the forecast for M4(2) accessible and adaptable homes.

# Growth in best case scenario accessible homes ten year forecast



The best-case scenario for delivery of new M4(2) homes in England over the coming decade is 1,394,983, a rise of 163% from 2020 when the forecast stood at 530,504.

The best-case scenario for delivery of new M4(3) homes in England over the coming decade is 106,119 compared to 44,919 in 2020, a rise of 136%. This, combined with the geographic variation in policy requirements, means that wheelchair users are overall faring worst as potential occupants for new build homes.

#### Differentiation between affordable and market homes

Some 61 local plans apply different policies to market and affordable housing supply. Where they do this, 83.7% of affordable homes are expected to be developed to one of the optional access standards, compared to 64.1% of market homes.

For the M4(2) accessible and adaptable standard, plans that differentiate between tenures indicate potential 10 year delivery of 122,645 (75%) of affordable homes and 203,198 (61%) of market stock. The difference in forecast delivery is the effect of the dominance of market homes in housing plans.

The way this group of plans differentiate between tenures sees far fewer wheelchair standard properties planned for market homes, with just 11,008 (3.3%) planned over the coming decade compared to 14,649 (8.9%) in affordable tenures.

It is questionable whether the result of treating tenures differently in this way will meet the needs of the population as a whole as access needs can arise in any household at any time of life

Sometimes developers negotiate a reduction in affordable homes requirements on grounds of viability. This means that plans which set a proportion of affordable homes to be designed to M4(2) or M4(3) standards are at risk of under achieving against the number accessible homes they intend to deliver. particularly where the policy applicable to market homes is substantially different from that for affordable homes.

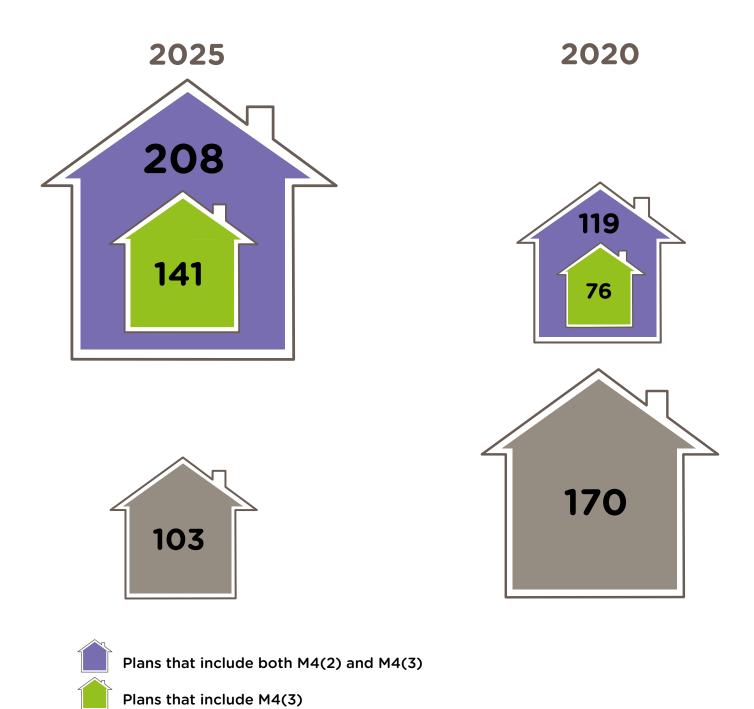
Habinteg is also concerned with the anecdotal evidence that M4(3) homes in market provision are often developed without any strategic marketing plan to target potential wheelchair user buyers, rather they are presented as a premium home to the general market.



## Accessible homes targets in local plans

The majority of English local plans now include requirements for M4(2) and M4(3) access standards, almost doubling the number that did so in 2020.

208 out of 311 local plans assessed contain policies setting requirements for a proportion of homes to be built to M4(2) accessible and adaptable standard and/or M4(3) wheelchair user dwelling standard. This compares to 119 plans in 2020 (and 96 in 2019).



Plans that provide only for homes that meet he baseline

# Draft plans are more likely to contain policies requiring accessible homes

- 69% of plans that are currently draft require a percentage of homes to be delivered to M4(2) compared to 65% of adopted plans
- 56% of plans that are currently draft require a percentage of homes to be delivered to M4(3) compared to 37% of adopted plans.





#### Widespread adoption

The London Plan requires all new homes in the Greater London Area (GLA) to meet M4(2) as a minimum, with 10% to be built to M4(3). This policy addresses the overall lack of accessible homes in the capital and the need to catch up with demand for wheelchair accessible homes in particular.<sup>ix</sup>

The 2025 forecast found 11 local plans that mimic the London plan and 75 where policies amount to a minimum of M4(2) for all homes some with differing requirements for M4(3) homes according to tenure. Of these, 54 are draft plans and 32 are adopted. Of the plans that don't take this approach, policy requirements vary significantly and are far from in line with the July 2022 government goal to establish M4(2) as the minimum standard.

The tendency for newer plans to include a higher requirement for accessible homes may be the impact of the July 2022 announcement of the government's plan to establish M4(2) as the regulatory baseline for all homes. Some draft plans state this in their explanatory material.

Another driver may be the effect of planning authorities following the approach of adopted plans that have passed inspection with high requirements for accessible homes. For example, an authority from the North West with this highly defined policy wording:

- The Council will seek that, as a minimum, all homes should be provided to Building Regulation Standard M4(2) 'Accessible and Adaptable dwellings'.
- The Council will seek that 10% of new housing meets Building Regulation requirement M4(3) 'Wheelchair user dwellings' i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users on sites over 0.5 of a hectare or of 10 dwellings or more.
- In cases where the above requirements are genuinely not viable or technically feasible, the Council will expect to see evidence of this before any lower level of provision is permitted.



# Max's story

Max Smith, 25, lives in Lincolnshire with his sister, Dakota, 13, and his mum, Karen. The family live in a shared ownership three-bedroom, end terrace house with a garden. Max is unable to work and is a wheelchair user. Max's mum, Karen, spoke to us on his behalf.

"I found our home in June 2019. It was a newbuild property that was being advertised as an accessible property. The development, which had been bought from the builders by a housing association, was in the final phase of sales. Importantly, it offered a shared ownership scheme, was adaptable and in a safe area.

Our home is now adapted to suit Max's needs. A Disabled Facilities Grant helped us with a through-floor lift into his bedroom, ceiling hoists, a wet room, and ramps.

But there are a number of key elements of our home that would make a big difference to Max's day to day life if they were changed. They include removal of the lift from the living room, which would give Max more privacy and not take up so much space in the only living room; extending the ground floor of the house, which would provide easier access for Max, as well as space for another separate living area; and, finally, a better front door entry system to enable Max to have greater independence."



A Disabled Facilities Grant helped us with a through-floor lift into his bedroom, ceiling hoists, a wet room, and ramps.

# Regional findings

The people who will experience the greatest regional inequality are disabled people who need wheelchair accessible properties.

London continues to lead in planning for accessible homes, despite seven local plans not explicitly demonstrating conformity with the London Plan. Overall there will be one new accessible home built in the next 10 years for every 21 citizens in Greater London.

The North East shows lower ambition by around seven times (one new accessible home of any kind per 156 citizens.)

Discounting the GLA area, there is a fivefold difference between the region with the highest ambition (East of England: 1 per 28 head of population) and the region with the lowest (North East).

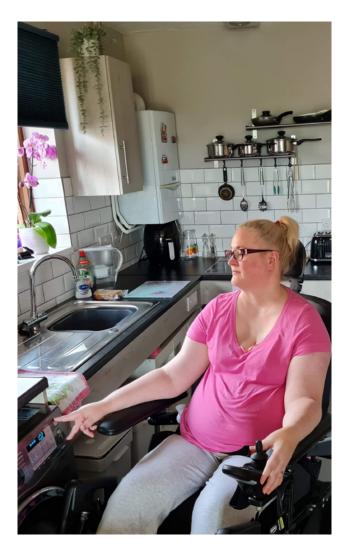
The 10 year forecast for delivery of M4(2) homes in London is over seven times higher than the North East which has the lowest ambition (one M4(2) home per 24 people versus one for every 184 people).

The ambition for delivery of M4(3) homes in London is almost 10 times the North West, which has the lowest ambition (one for every 210 people versus just one M4(3) home for every 2006 people).

The ambition to deliver wheelchair accessible homes in the North West is around one quarter of the national average. (One per 2006 citizens versus one per 538 citizens).

The forecast for the North West and North East regions could be due to the lower proportion of draft plans included in the analysis. Overall, two thirds of the plans in these regions were adopted, with one third at draft stage. However, it is notable that some plans adopted relatively recently remain moderate in their accessible homes ambitions, with fewer London Plan 'lookalikes' than more ambitious regions.

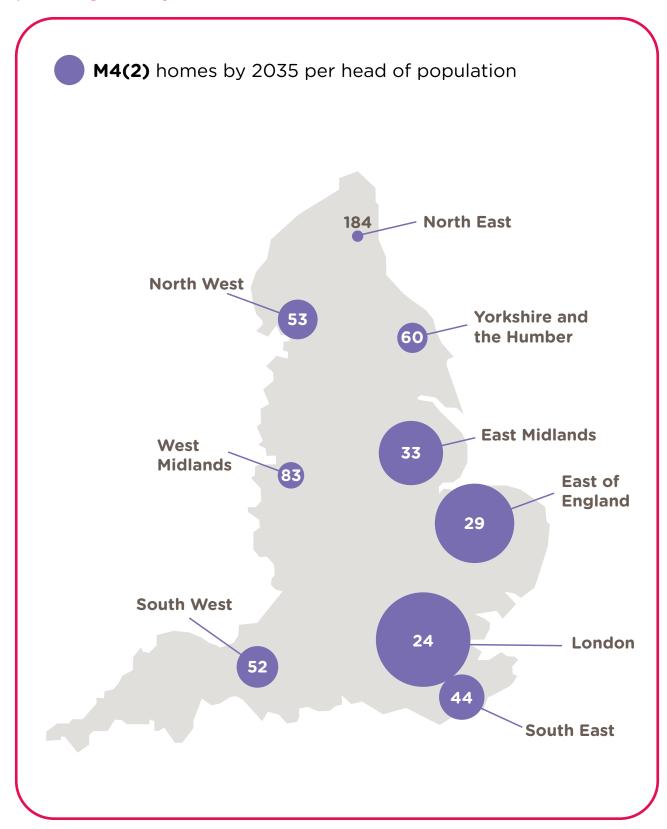
In the North West it is notable that of the nine authorities that make up the Greater Manchester Combined Authority, none have a policy requiring any M4(3) properties.

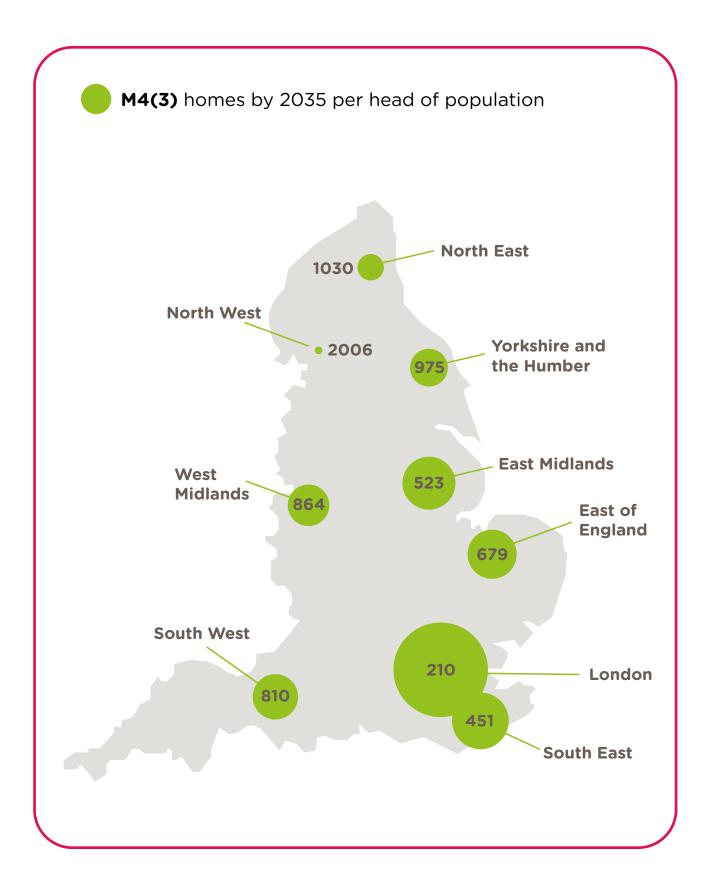


## 2020/2025 Accessible homes ambitions by region



# Number of accessible homes planned per region by 2035





#### Policy wording

Policy wording varied between authorities and regions.

More precise wording provides a more clear context for planning applicants and decision makers, such as this policy wording from a West Midlands planning authority's preferred options consultation:

- All new dwellings shall meet the requirements for Category 2 – accessible and adaptable dwellings set out in Part M4(2) of Schedule 1 to the Building Regulations2010 (as amended).
- On developments of 10 or more homes, ten per cent of dwellings shall meet the requirements for Category 3 – wheelchair user dwellings set out in Part M4(3) of Schedule 1 to the Building Regulation 2010 (as amended).

Some plans have wording which, whilst it establishes a positive tone regarding accessible housing, lacks precision and firm requirements. Such as this example from a South West planning authority:

- To enable people to stay in their homes as their needs change an appropriate proportion of new homes on sites of 10 or more dwellings should meet M4(2) of the Building Regulation 2015 (accessible and adaptable dwellings). This will be determined on a site by site basis taking into consideration local demographic requirements, site specific circumstances, and the overall design requirements set out under Policy D2. Where step free access is not viable, due to flood risk, topography or other relevant site constraints this will be taken into consideration.
- Dwellings that meet M4(3) (wheelchair user dwellings) will be supported and can count towards the requirement above.

Planning policy wording which introduces an element of doubt are common. Some list factors such as flood risk, topography or general 'site specific factors' as reasons that accessible homes may not be required. Others use phrases such as 'wherever possible', 'where practical' or 'unless it can be demonstrated that it is unfeasible to do so'. Anecdotally, Habinteg understands that planning inspectors sometimes require such wording to be added into planning policies. Such caveats open the door to challenges from developers that are seeking to minimise accessible homes obligations and can therefore minimise the intended outcome of the policy requirement.

As previously noted, there are fewer wheelchair accessible properties required of market tenures, and inclusion of policies on M4(3) in general have not kept pace with those for M4(2).

Plans which do require M4(3) sometimes give a rationale for doing so either in the policy wording or a foot note. One such plan from the South East requires:

"...for proposals providing 10 or more dwellings, 10% of the residential units should be suitable for occupation by a wheelchair user in accordance with Building Regulation M4(3).. and be evenly spread across both private and affordable tenure

The plan includes a footnote explanation: ...in accordance with the Equality and Human Rights Commission recommendation that at least 10% of new-build housing across all tenure types should be built to higher wheelchair-accessible standards

# Stuart's story

Stuart Brown, 56, lives in a three-storey house in Telford, in the West Midlands. Stuart has made adaptations to his home to suit his needs after he became a wheelchair user five years ago. He has installed a lift and has made other alterations to his home so he can access his front door and rear garden unassisted.

"I unexpectedly became wheelchair dependent and aphonic (a medical term for losing your voice) aged 51, which meant that the home I was living in was suddenly no longer suitable. My home was built in 2009, has three storeys, a needlessly stepped front and rear access, and a gravel strip at the entrance to the garden.

I initially looked for an alternative home such as a bungalow but found most were smaller and more expensive than my current house, had stepped entrances and doors too narrow for a wheelchair, not all of which could be widened.

After weighing up my options, I decided to modify my own home. I had a lift installed that now serves all three storeys of the house, along with an additional handrail for the stairs to ensure I could still use them in the event of an emergency. In fact, Building Control would not approve the installation of the lift until they were convinced I could safely evacuate via the stairs if needed. Alongside the lift, other building alterations mean I can now access the front door, garden, and garden gate without assistance, and move from floor to floor in my home with dignity.



It was only a combination of my own training in construction management and finding a very good builder that saved the project. I'd recommend anyone else embarking on such a project to check their architect's experience in accessibility adaptations.

From the whole process, I learned that far too few houses are built to M4(2) adaptable and accessible standard and the M4(3) wheelchair user standard. I'm pleased that my local authority's new local plan outlines a percentage of homes that must be M4(2) and M4(3) in developments of over 100 homes.

However, I think this size of development is too large as my own home is in a development of 3,300 homes that was approved in smaller phases, some of which were less than 100 homes."

After weighing up my options,
I decided to modify my own home.

# **Policy opportunities**

Since forming in July 2024, the Labour Government has committed to a major programme of planning reform and increased housebuilding.

Several initiatives and upcoming strategies support these goals:

# Long-term housing strategy

The forthcoming long-term housing strategy is expected to set a framework for meeting national housing needs. Habinteg and others have called for close consideration of the needs of older and disabled people within the strategy. Government has the opportunity to:

- Set out a timeline to implement M4(2) as the baseline for all new homes;
- Set requirements for local plans to include targets for M4(3) homes.

# Planning and Infrastructure Bill

The Planning and Infrastructure Bill is aimed at streamlining the planning system and supporting housing delivery. Opportunities within the Bill include:

- By mandating stronger planning powers, aligned infrastructure delivery, and local control over development standards and funding, enabling accessibility to be prioritised in new housing developments, the Bill has the opportunity to promote the development of M4(2) homes.
- Enhancing training for planning committee members on building regulations, particularly Part M, to ensure accessibility is properly considered in both local plans and new developments.

- The potential for Spatial Development Strategies (SDS) to assess and plan for the housing needs of older and disabled people.
- In the context of devolution, an SDS will allow metro mayors to set a vision for regional housing, decide where and how many wheelchair accessible homes should be built, and ensure this is backed by transport and public service infrastructure.

#### Homes England funding

In support of housebuilding targets, Homes England will continue to distribute public investment to unlock housing delivery. Future funding programmes present opportunities to:

- Make M4(2) accessibility a minimum requirement for funded developments.
- Prioritise schemes that include M4(3) wheelchair user homes.

#### **New Towns**

To support its growth ambitions, the government aims to deliver up to 100 New Towns, this presents the government with an opportunity to:

- Establish design quality standards for new developments.
- Ensure new settlements meet inclusive design principles, with M4(2) homes a minimum requirement and M4(3) standards reflected in plans.

## Conclusion

Conducting the Accessible Homes Forecast 10 years on from the introduction of the optional standards has shown a gradual adoption of policies using the M4(2) and M4(3) standards in all regions with a significant increase in plans which do so in the last five years.

The calculations Habinteg has made, based on the best possible circumstances for development, show that just over half of new homes due to be delivered in the next 10 years could be built to one or other of the optional standards. However, for this to happen all development would have to be of a size, tenure and location to qualify for the planning requirements, and planning teams would have to apply the policies, without any exceptions argued on site characteristics or viability.

Linking accessibility policies to affordable housing targets presents a potential risk to delivery. Accessible homes are undoubtedly needed in affordable tenures – disabled people being more prevalent as tenants in the social sector. However, affordable housing quotas are vulnerable to being reduced should developers look to negotiate obligations in pursuit of higher profit margins.

It is also problematic to assign accessible housing provision to affordable homes in different proportions to market homes. Impairments that lead to disability can emerge in any household at any time and nationally we have an ageing population driving an increasing incidence of age-related disability. M4(2) features benefit everyone by enabling people to remain in their homes longer, supporting families to have healthy, active lives, and improving overall housing quality. Likewise, while a greater number of wheelchair users live in social housing, tenure splits in local plan policies create a two-tier system that risks excluding disabled and older people from accessing suitable homes in the open market.

Regional variations in the proportion of accessible homes forecast do not reflect the universal need for accessible housing, and the pronounced differential in anticipated delivery of M4(3) homes creates an unacceptable postcode lottery for wheelchair users seeking to find suitable places to live.

Not only will these variations have an unfair negative impact on the day to day lives of older and disabled people, they drive up avoidable future costs to the public purse in the form of more expensive adaptations and increased health and social care costs, much of which falls to local authorities to maintain.

To mitigate this risk, Habinteg will continue to champion the implementation of the M4(2) accessible and adaptable standard as the regulatory baseline for all homes.

We believe the planning inspectorate has a key role that should be carried out in line with the Public Sector Equality Duty of the Equality Act 2010, ensuring that all local plans specifically address the needs of older and disabled people through robustly worded policy requirements for M4(3) homes.

Finally, we need to track accessible homes delivery at local, regional and national level. This forecast exercise has shown the complexity and variation in approaches to setting local plan policies and has offered a method for very a broad estimate of how many accessible new homes such plans could generate. But to truly understand the impact of such policies on the design of new homes and to provide realistic data to support future strategic planning - we need clear annual data on the number of planning permissions issued to each standard and ultimately, the number of homes approved by building inspectors under each category. Doing this will help us understand what happens once a plan is approved and enable the sector to identify and address any practical barriers to delivery of local and national policy targets.

## Recommendations

#### 1. Recommendations for central Government

Objective: Embed inclusive design as a national standard and ensure legislative and funding mechanisms reflect the diverse needs of the population—particularly disabled and older people.

- Mandate the M4(2) accessible and adaptable standard as the national baseline standard for all new residential development across all types and tenures. This ensures all future homes meet basic accessibility standards, enabling residents to remain in their homes as their needs change over time. By applying M4(2) requirements universally, this approach mitigates the risk of non-delivery and ensures a consistent, inclusive standard across the entire housing market. It also aligns with demographic trends showing an ageing population and growing demand for flexible living environments.
- Mandate that a minimum requirement for new homes to meet M4(3) wheelchair user standards is included in every local plan, setting 10% as the starting point where plans fail to do so, whilst allowing flexibility to set higher targets based on local need. This responds to chronic undersupply of wheelchair-accessible homes and supports government aims to reduce health inequalities and support independent living
- Introduce explicit wording within the Planning and Infrastructure Bill and the National Planning Policy Framework (NPPF) to require the needs of disabled and older people to be strategically addressed in housing policies and land use planning. Inclusion of these groups should be considered a national priority, not optional. Legislative clarity will remove ambiguity and prevent inconsistent interpretation across planning authorities.

- Ensure Homes England's new funding framework (including its Prospectus) includes a requirement for all funded schemes to meet M4(2) standards, with preference given to schemes that deliver M4(3) homes. Public money should only fund developments that offer long-term value, inclusivity, and reduce the cost of future adaptations and care provision.
- The government should embed accessible and adaptable design guidance into the UK's upcoming long-term plan for housing (or national housing strategy) to ensure a consistent national approach that delivers more accessible, age-friendly, sustainable and future proof homes that support population health, independence, and building long-term resilience in the housing system.

# 2. Recommendations for the Planning Inspectorate

Objective: Ensure consistency in the interpretation and application of accessibility standards in local plans and decision-making.

- Reject Local Plans that fail to include clear policies on M4(3) wheelchair user homes in all types and tenures, and any that do not respond to local evidence of need for accessible housing. Nationally defined standards and targets must be upheld in plan-making to avoid neglecting disabled people's housing needs at the local level.
- Establish a consistent and robust approach
  to planning policy wording, which supports
  delivery of accessible and adaptable
  housing. Current inconsistency, ambiguity
  and phrases that open the door to challenge
  in local plan language lead to unequal
  application of standards and confusion for
  developers. A template or best practice
  framework should be introduced to support
  uniformity across planning authorities.
- Provide planning inspectors with enhanced training on accessible housing policies, including demographic drivers, inclusive design principles, and technical details of Part M of the Building Regulations.

#### 3. Recommendations for local authorities

Objective: Build local capacity to plan for and enforce accessible and inclusive housing.

- Ensure local plans include specific targets and policies for M4(3) homes. A proactive approach to inclusive housing should be embedded in local strategic planning. Inclusive housing must be a core component of local strategic planning - not an optional consideration - with measurable, time-bound targets that directly respond to the needs of the population.
- Implement mandatory, ongoing training for Planning teams committee members and Building Control officers on the technical requirements and policy framework for M4(2) and M4(3) homes. Better understanding of these regulations will lead to more informed decision-making and effective implementation of local plan policies.
- Provide mandatory training for enforcement officers and compliance teams to enable them to properly assess developments for compliance with accessibility standards

   this will help reduce the risk of noncompliance and ensure that accessibility is not compromised during or after the construction process.

# 4. Recommendations for developers and housebuilders

Objective: Promote innovation, responsibility, and market leadership in inclusive housing design.

- Commit to delivering M4(2) as the standard design for all new housing, including market-sale, affordable, and build to rent schemes

   this provides long-term market value, supports social responsibility goals, and helps to future-proof developments for an ageing population.
- Incorporate a proportion of M4(3) homes across all developments, not just specialist housing schemes, based on local authority policy or demonstrated local need. A more balanced housing mix will better reflect the diversity of households and support community sustainability.
- To maximise uptake and ensure homes reach those who need them, developers and housing providers should also adopt targeted marketing practices that actively promote accessible homes to disabled people and older potential residents.

# Sophie's story

Sophie Garland, 35, lives just outside Bristol, in the southwest of England. Sophie has lived in a wheelchair accessible flat since October 2021. She moved into her home after spending 14 months in a nursing home's dementia ward due to a lack of accessible housing. She was aged just 30 at the time.

"In February 2020, I was diagnosed with a functional neurological disorder after attending hospital for a severe ear infection. My condition meant I needed to use a wheelchair. When I was discharged from hospital early due to the pandemic, doctors moved me to a nursing home's dementia ward because of a lack of accessible housing.

"The plan was for me to stay there for a month before moving into somewhere with assisted living, but that turned into 14 months. If the pandemic didn't exist, the nursing home would have been fine, but I was shut away in a room under strict rules.

"They didn't let anyone in or out. Being on a dementia ward, I felt I was either treated like their granddaughter or a patient with dementia. It was extremely hard on my mental health.

Working with my social worker, I looked at various flats just outside of Bristol before applying for a Habinteg accessible and adaptable flat. In October 2021, I made the move to my home in Gainsborough Court.

"I love my new flat. My mental health has improved dramatically. There's so much space for me to move from room to room in my wheelchair, and I'm free to leave whenever I want.

"I have carers who come in four times a day, but the countertop in my kitchen is wheelchair height if I want to cook for myself, and I have an accessible bathroom. The access in the flat is fantastic, and it's so spacious."



I love my new flat. My mental health has improved dramatically.

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#### **About Habinteg**

Habinteg is a housing association that champions inclusion by providing and promoting accessible homes and neighbourhoods that welcome and include everyone. With over 50 years' experience in housing and disability, we manage over 3300 accessible properties across England. We believe that people are disabled by barriers in society and negative public attitudes, rather than by their individual impairments.



# Habinteg Accessible homes. Independent lives.

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