

## CIH response to MHCLG consultation on raising accessibility standards in new homes

### Introduction

CIH welcomes the opportunity to respond to the Government's consultation on [raising accessibility standards in new homes](#).

CIH has long called for all new homes to be developed to higher standards of accessibility and adaptability, and we are a member of the Housing Made for Everyone ([HoME](#)) coalition. This is a group of ten organisations which have come together to bring a greater urgency to that call for action.

### Responses to detailed questions

#### **Q3. Do you support the Government's intention to raise accessibility standards for new homes? Please explain your reasons.**

CIH supports the government's aim to raise accessibility standards in new homes; we believe that Building Regulations Part M 4 (2) should be made the mandatory baseline for new housing, to increase the number of homes that are more accessible and easily adaptable to meet the changing needs of our current and future population.

There is support within the population for homes to be built to standards that make them suitable for people of all ages and abilities; [polling](#) of more than 4,000 people in the UK in 2019 by the Centre for Ageing Better revealed that nearly three-quarters (72 per cent) agreed with this.

Our homes are fundamental to enabling us to live safe and healthy lives; however, the age, design and size of too many of our existing homes mean that these often require significant adaptations to make them safe for disabled people or those with limiting conditions to undertake daily tasks of living. Poor and non-adapted housing has significant risks and costs for the people living in them and for wider society; for example BRE has [estimated](#) that falls in the home cost the NHS £435 million.



The UK has the oldest housing stock in Europe, with nearly 38 per cent built before 1946 (see [BRE research](#)). Currently in England [91 per cent](#) of existing homes lack the four basic accessibility features which make a home more visitable, rather than liveable. The shortfall in building new homes in the UK over decades means that all of the housing we develop now will need to last a very long time (anywhere up to 2,000 years according to an [estimate](#) by the LGA), and support numerous households with varying needs over that period.

14.1 million people or 21 per cent of the UK's [population](#) is disabled, including a significant increase in people of working age and children within that figure. Habinteg estimates that over [400,000](#) wheelchair users in England alone are living in unsuitable homes that are not accessible or adapted. This has a huge impact on disabled people's ability to undertake daily tasks of living independently, or to participate in social and economic activity. Disabled people living in an inaccessible home are [four times](#) more likely to be unemployed.

We also have an ageing population; ONS [estimates](#) that the number of people 85 and older will nearly double over the next 25 years, and one in four will be over 65. With increased age comes increasing likelihood of help being required to complete activities of daily living; [a recent health survey](#) revealed that 19 per cent of people over 65 required such help and 47 per cent of those 80 and older. However, only one new accessible home is planned for every fifteen people over 65 by 2030 (see [Habinteg's analysis](#)).

The COVID-19 pandemic and lockdown have further highlighted how important a decent home is; [research](#) by Habinteg illustrated that disabled people were 3 times more likely than non-disabled people to report that their home undermined their wellbeing during the lockdown due to its inaccessibility, and 17 times more likely to report that it meant they could not undertake daily tasks of living without help.

In spite of the evidence of the need to build homes to higher standards of space and accessibility, currently we are failing to do so. [Analysis](#) of local plans showed that outside London, only 23 per cent of homes planned would meet any optional accessibility standard and only 1 per cent would be suitable for wheelchair users. A [survey](#) of local planning authorities for the Centre for Ageing Better revealed that 97 per cent of the respondents will see the need for accessible homes increase in the next ten years, and one quarter report the need is already severe. To drive forward improvement we need government to mandate the higher accessibility standard as the basic requirement, and to be clear about the expectation for increased provision of wheelchair accessible homes (M 4 (3)).

**Q4. Which of the five options do you support? Please explain your reasons, including the advantages and disadvantages of your preferred option(s).**

CIH supports option 2 for government to mandate the current M4 (2) requirement in Building Regulations as the minimum standard for all new homes. There should be a clear expectation that local planning authorities will identify and plan to meet local needs for wheelchair accessible housing - M4 (3) - set out in local planning policies.

There should also be clear and very limited circumstances in which the local planning authority may be able to grant planning permission for housing to be developed to M4 (1), with the requirement for the developer to evidence and justify why it cannot comply with some or all of the requirements of M4 (2).

Setting the higher standard as the requirement for all new homes will give greater certainty to all developers, ensure this is factored into land prices, and tackle challenges on viability that are the biggest barrier to providing more accessible homes (79 per cent as reported to the Centre for Ageing Better's [survey](#)).

CIH supports option 4 as an alternative, whereby government would set both M4 (2) as the mandatory standard for all homes alongside a percentage of homes to be delivered across all local authorities to M4 (3) wheelchair standard. If this is the option to be applied, local planning authorities should be able to set out plans to deliver a higher number of wheelchair accessible homes, where they identify greater local need.

The same exceptional use of the lower M4 (1) should apply.

In both cases, there should also be an expectation that local authorities will develop accessible housing registers that can help people find suitable homes, including across local authority boundaries.

CIH does not support option 1 relying on revised planning policy on the use of optional technical standards. This effectively maintains the existing situation which is failing to deliver the higher standards of accessibility we need in new homes. We already have a significant shortfall of appropriate accessible and adaptable homes to meet the needs of our current and future population (as set out in our response to question 3 above) and therefore a stronger mandatory standard is required.

CIH does not support option 5 to change the content of the mandatory technical standard, to a position in between M4 (1) and (2). Such a revision would cause unnecessary delay, and we also believe that the current M4 (2) is the appropriate minimum standard.

Option 3 proposes the removal of M4 (1) entirely so that no new homes can be developed to this standard. We are concerned that this would remove the flexibility for local authorities to obtain homes that could meet local needs, albeit at a lower accessibility standard than is desirable. We think this flexibility should be retained but within very limited circumstances and with the requirement for the developer to evidence and justify why it cannot comply with some or all of the requirements of M4 (2).

**Q5. If you answered 'none' to question 4, do you think the government should take a different approach? If yes, please explain what approach you consider favourable and why.**

N/A

**Q6. Do you agree with the estimated cost per dwelling of meeting M4 (2), compared to current industry standards, in paragraph 45? If no, please comment on what you estimate these costs to be and how you would expect these costs to vary between types of housing. Please provide any evidence to support your answers.**

The government consultation paper sets out an estimated cost of £1,400 per dwelling to build to M4 (2) rather than the lower category 1. This is a reasonable estimate for one type of property only. Given the range of location, size and type of developments it is very difficult to make an assessment of the overall costs for the alternative options.

The paper is not clear about how this figure is made up in terms of technical and space costs. Where the local planning authority requires homes to be built to the Nationally Described Space Standards (NDSS) or the developer voluntarily uses this, the additional costs to deliver the technical changes required to meet M4 (2) would be less. From April 2021, all homes developed under permitted development rights will be required to meet the NDSS. If this was introduced for all new homes, alongside the introduction of M4 (2), all developers will be factoring in the additional requirements and buying land with the same assumptions. It would simplify the planning system, give greater certainty to developers, and deliver better homes.

**Q7. Do you agree with the proportion of new dwellings already meeting or exceeding M4 (2) over the next 10 years in paragraph 45? If no, please comment on your alternative view and how you would expect this to vary between types of housing. Please provide any evidence to support your answers.**

Government estimates that 10 per cent of new homes meet or exceed M4 (2) and that this would increase to 30 per cent over the next 10 years. It is not clear what

has informed this estimation, but [analysis](#) of local plans by Habinteg revealed that less than half set specific requirements for a percentage of new homes to be built to any accessible or adaptable standard, and less than one fifth included a requirement for any wheelchair user dwellings.

There are some areas of the country, such as London, which have already set the requirement for all new homes to be built to higher accessible and adaptable standards, and also for a percentage to be wheelchair accessible. This shows what is possible but also skews the overall delivery; ensuring that this approach is taken throughout England will mean people do not suffer from a postcode lottery in their access to a suitable home. The urgency of the case, in view of the number of people already living in unsuitable housing, and the implications of an ageing population (as set out in the answer to question 3) means that intervention is necessary to ensure the development of accessible and adaptable homes.

**Q8. Do you have any comments on the costs and benefits of the other options set out? If yes, please comment including any evidence to support your response.**

The benefits of people living in an accessible home that supports their health and wellbeing are many, both for themselves and their households, as well as for wider society in terms of their ability to be socially and economically active. There are also significant impacts for public services such as health and care. Not all of these benefits are easy to quantify.

Living in an accessible home supports disabled people to engage with education, training and employment, and support good physical and mental health.

Homes built to M4 (2) accessible standards would significantly reduce the risk of falls in the home, which [BRE](#) has calculated costs the NHS £435 million (first year treatment costs). Suitable and accessible homes would also support people to be discharged from hospital more quickly and safely. By enabling people to undertake daily tasks more safely, accessible homes are likely to reduce or delay the need to enter residential care (with average costs over £30,000 a year) and similarly reduce the need for formal care packages.

Government committed £573 million of funding for adaptations to existing homes at the spending review; this level of investment is likely to be required for many years to come, but a requirement for all new homes to be built to the higher M4 (2) standard will eventually help to address the growing demand that still continues to outstrip increasing investment in adaptations.

**Q9. Do you have any comments on the initial equality impact assessment? If yes, please provide your comments including any evidence to further determine the positive and any negative impacts.**

More information on the evidence and modelling used to assess the impact of the different options would be useful. However, as both options 2 and 4 would increase the overall number of homes built to higher accessibility standards, these would be more likely to benefit older and disabled people. Options 1 and 5 would not increase this type of housing or at least would delay any further significant increase in the numbers, which would mean a negative long term impact for older and disabled people, given that the numbers of both groups within the population are increasing.

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Further information is available at: [www.cih.org](http://www.cih.org)

CIH is a member of the HoME coalition, a group of organisations that have a shared vision to review society's approach to housing and to ensure that all new housing is suitable for the changing needs of our ageing population and disabled people. Find out more [here](#).

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