

# Consultation Response

## Raising accessibility standards for new homes

Ministry of Housing, Communities and Local Government

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## **About this consultation**

In June 2019, the government announced its intention to consult on the accessibility of new homes. This consultation considers how to raise accessibility standards, recognising the importance of suitable homes for older and disabled people. In particular, it considers how the accessible and adaptable standard for homes (known as M4(2) in Part M of the Building Regulations) and the wheelchair user standard (known as M4(3)) should be used as technical standards and seeks views on various options.

## **Key points and recommendations**

- There is currently a huge shortage of accessible and adaptable homes, and the planning system does not support developers trying to build to higher accessibility standards.
- With an ageing population, demand for accessible housing is growing fast and a failure to address this will create significant problems both for individual older people and for the cost of caring for our ageing population.
- Accessible housing is key to the well-being of an older person with implications for their ability to connect with their local community, to contribute to society and for issues such as loneliness and isolation.
- Lack of accessible housing puts further pressure on the NHS and Social Care. There are avoidable health consequences for those living in un-adapted and inaccessible homes. Hospital discharges are delayed, Individuals are unable to live independently and need help with daily tasks.
- Aiming to build 300,000 homes a year in an environment which discourages building to higher standards is a wasted opportunity.
- If the Government is to ensure that the UK's housing stock is suitable for our ageing population, it is essential that it makes higher accessibility standards mandatory.
- Age UK supports the consultation's Option 4 – a universal requirement for Part M4 Category 2 of the building regulations (Accessible and adaptable dwellings) and a quota of 10% of homes meeting Category 3 (Wheelchair user dwellings).

## **About Age UK**

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances. In the UK, the Charity helps more than seven million older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people. Its work focuses on ensuring

that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe and secure at home; and feel valued and able to participate.

## **Introduction**

Age UK has long argued for higher accessibility standards for new-build housing, and we welcome both this consultation and the Government's stated policy intention. Accessible housing is essential if we are to accommodate and look after our country's ageing population, and currently far too little meets the required standard.

Mainstream housing is the key issue, and improving it is vital. 96% of older households live in mainstream housing, so getting this right is of crucial importance.<sup>i</sup>

This is a golden opportunity to begin the process of future-proofing our housing stock, and over time this will make a significant difference to the cost of caring for our ageing population and the lives of many older and disabled people across the country.

## **Consultation questions**

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

We support the intention to raise accessibility standards of new homes – we believe this is essential if we are to make any progress towards making the UK's housing stock age friendly.

There is currently a significant shortage of accessible homes. Analysis of the 2018/19 English Housing Survey shows that only 9% of homes have all four features that make it possible for a wheelchair user to visit a dwelling and there are over 400,000 wheelchair users living in homes which are neither adapted nor accessible.<sup>ii</sup> Those homes with the four "visitable" features - level approach and access, sufficient space for a wheelchair to turn and a WC at entrance level - do not necessarily have other accessible features. Much of our existing housing stock is difficult, often impossible, to adapt. Plumbing is configured in such a way that it is difficult to install a walk-in shower, internal staircases are often narrow with bedrooms and bathrooms on an upper floor, access is not level. This has significant implications for those living with a disability, including many frailer older people who would benefit from a more accessible home.

Some of the most common adaptations financed by the Disabled Facilities Grant are ramps, stair lifts, walk-in showers and grab rails. Current Category 1 regulation does not require level access, stairs to which a lift can be installed, plumbing which can be adapted for a walk-in shower or bathroom walls strong enough to take a grab rail. These are relatively minor adaptations, commonly needed, that can transform daily life for an older person and are all features of higher Category 2 accessibility standards.

A lack of accessible housing means that many disabled and frail older people are living without the adaptations they need. This has implications for their ability to remain connected to the community around them, for their sense of loneliness and isolation and for the cost of caring for our ageing population. The ability to adapt a house is key to preventing unnecessary falls, the speed and ease of discharging vulnerable patients from hospital, avoiding the unnecessary cost of help with daily tasks or moving older people with mobility issues into residential accommodation with care.

If a home modification defers entry into residential care, it could save an average of £29,270 per person pa.<sup>iii</sup> The combined cost of hospitalisation and social care for hip fractures (most of which are caused by falls) is approaching £2bn a year.<sup>iv</sup> The average cost of installing a ramp funded by the DFG was £3,928 in 2016/7 and the average cost of an extension to provide accessible accommodation was £31,939<sup>v</sup>. Failure to provide accessible housing is expensive.

As the introduction to this consultation acknowledges, this unmet need is set to increase substantially over the coming years as our population ages. Specialist housing for older people has a part to play and increasing the choice available may make this a more attractive solution. Timing a move into specialist housing is difficult. People often say that they would be happy to move in the future but not immediately. If they do look for somewhere new, specialist accommodation seems too much of a step at younger ages and at a time when it feels more suitable, people usually prefer to remain in the home they are used to. A small-scale survey conducted by BMG Research in July 2017 showed that 31% of 55-64 year olds said that they wanted to move as they got older, only 12% of those over 75 wanted to move.<sup>vi</sup> This is backed up by analysis from the Institute for Fiscal Studies (IFS) showing that moving is more common for people in their 50's and 60's, when specialist housing seems less suitable, falls for those in their 70's and increases rapidly as a result of necessity for people in their 80's.<sup>vii</sup> Imaginative specialist housing can respond to this challenge and make the step more appealing to younger aged groups and the market is set to grow.

However, specialist housing alone will not fill the gap. 96% of older households currently live in mainstream housing<sup>viii</sup> and even with significant growth in the specialist market, the majority of older people will continue to do so. Accessible mainstream housing is crucial in bridging the needs of a younger and older life. Offering that choice is important for older people and for healthy intergenerational communities. Accessible mainstream housing is key to housing an older population.

We have spoken to a large number of builders over the last six months to understand this issue from their perspective. Again, and again, we have heard that many would be willing to build to the higher accessibility standards of Category 2 and Category 3 but need a level

playing field to make this economic. Those that do build to Category 2 are competing for land with others building to lower standards. We attach a letter from Kier Group (Appendix 1) which summarises this much-repeated position. The current system is complex and discourages building to higher standards. One of the larger builders pointed out that with multiple divisions, building within multiple local authorities they are dealing with numerous different variables. This creates unnecessary cost and the lack of a level playing field means that the lowest common denominator wins.

Given the social and financial benefits of accessibility, the lack of accessible homes currently available and the demands of our ageing population building new homes to higher accessible standards is essential. To aim to build 300,000 new homes per year without higher accessibility standards is a wasted opportunity, storing up further problems for the future. To be building these homes within a planning framework which discourages those builders wanting to raise standards is something that needs to urgently change. Higher accessibility standards need to be national and mandatory.

**3. Which of the 5 options do you support? You can choose more than one option or none. Please explain your reasons, including the advantages and disadvantages of your preferred option(s)**

Age UK supports Option 4. As explained above, many minor, commonly needed adaptations such as grab rails, stair lifts and walk-in showers require building to Category 2. Given the urgent and growing need for accessible housing, all new homes should be built to Category 2 as a minimum.

The forecasts in this consultation suggest that trying to achieve this through the status quo will lead to 30% of new homes being built to Category 2 in ten years' time. Our discussions with builders confirm that mandatory national standards would be required to achieve more than this. The estimated figure of 30% of new homes being built to Category 2 in ten years' time is vulnerable to an economic downturn but even at this level, it is simply not enough to meet the needs of an ageing population.

More work needs to be done in forecasting the need for accessible housing. Putting together a number of factors, however, one can see that if only 30% of homes are built to Category 2 demand will substantially exceed supply. The BMG 2017 research showed that 24% of those aged between 65 and 74 had an adaptation in their home as did 32% of those aged 75 and over.<sup>ix</sup> Other studies suggest that 27% of older people have adaptations installed in their home.<sup>x</sup> Applying these figures to ONS forecasts for the growth in older households, together with figures for working age/child disability, it is easy to see that even with an increase in the size of the specialist market a 30% build to Category 2 will not be nearly sufficient to meet demand.

It is worth bearing in mind that the 30% will not be spread evenly across the country. The status quo produces very different outcomes in different areas. Furthermore, not all

accessible homes will be lived in by those who need them. There will be a significant degree of mismatch.

Older people now represent about a third of annual property moves and state a preference for new build.<sup>xi</sup> So, they are likely to be an important part of the new build market. Homes are being built to house many generations of occupants and making all homes Category 2 allows maximum flexibility, future proofs our housing stock and avoids unnecessary expense retrofitting homes to meet the needs of future generations of occupants. The cost is one of the main reasons older people do not make adaptations<sup>xii</sup> and this can be high if the original build standards do not lend the dwelling to change.

Regulation requiring 90% of homes to be built to Category 2 and 10% to Category 3 has worked well in London and Manchester and this is a good precedent to follow. Exemptions should be kept to a minimum, and any subsequent legislation must be careful about how these are framed.

It is only if we build all new homes to a minimum of Category 2, that we can hope to be in a position where there is enough accessible housing stock to meet the needs of our ageing population.

If the regulation is mandatory, processes will be standardised reducing costs, the complexity of negotiating numbers of homes to be built to which Category at local authority level will fall away, leaving a much simpler, more efficient system. It will provide the level playing field which builders need and avoid the downward pressure on standards that is created by the existing system.

- 4. If you answered 'None' to Q4, do you think the Government should take a different approach?**
- 5. Do you agree with the estimated additional 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 e.g. detached, semi-detached or flats? Please provide any evidence to support your answers.**

Estimating an average cost for building to Category 2 is difficult, given the different characteristics of each development. Much of the extra cost, approximately £850, in the £1,400 figure mentioned in the consultation is associated with the extra space required. In the many cases, the site can be redesigned to incorporate higher accessibility standards without a loss of density and this estimated extra cost falls away. If minimum space standards are also introduced, then the extra space costs of Category 2 will reduce. The build cost element is then relatively small.

It is clear from our discussions with builders that making this mandatory does much to reduce the impact. The extra cost is lower if the system is simpler and products and processes designed to deal with the same accessibility standards on all sites and in all companies. Importantly, if there is a level playing field for all developers, the market, particularly land values, will adapt to incorporate any extra costs there are. The impact

of the extra cost of building to the higher standards on an individual company, which at the moment can be an issue, will be much reduced.

Where there are extra costs these are relatively low and overwhelmingly outweighed by cost savings.

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

As mentioned above, it seems that these forecasts are vulnerable to an economic downturn. If higher accessibility standards are optional and the costs fall disproportionately on particular companies there will be many who, faced with a difficult economic environment, feel obliged to lower standards.

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

Option 1: For the reasons set out above, building to Category 2 under Option 1 is more expensive than it would be under a mandatory framework and the impact of that extra cost would continue to fall disproportionately on those companies trying to raise standards. The result would be fewer accessible homes with the social and economic cost that entails.

Option 5: Changing the content of the technical standards should not delay implementing a change which is long overdue. The current standards work well in London and Manchester.

**8. 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.**

Given the uncertainty of the current economic environment, we are not convinced that Option 1 will lead to an increase in the number of accessible homes and so do not agree that all options will necessarily “advance the equality of opportunity between people who share a protected characteristic and those who do not”.

Furthermore, the fact that our population is ageing, that there is therefore a growing demand for accessible housing and that it is already in short supply is well known.

“Advancing the equality of opportunity between people who share a protected characteristic and those who do not” must require taking mitigating action to offset known events that will advance inequality. With demand for accessibility increasing, the status quo will not produce sufficient accessible housing to prevent the shortage of accessible housing increasing.

If we want to turn the fact of our ageing population into something that is positive and help older people to contribute both socially and economically, we will need policies, of which this is one, that create the right environment. Failing to act where necessary will limit the ability of older people to contribute. This will not help to “foster good relations between people who share a protected characteristic and those who do not”.



# Appendix 1



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3 November 2020

Dear Lisabel

## Delivering Accessible Homes

Thank you for your letter of the 15<sup>th</sup> October regarding the above. This is clearly a complex issue and one that requires strong intervention from Central Government.

The key to delivering more accessible homes is to ensure that no individual developer is made less competitive or disadvantaged when doing so. Your letter clearly recognises this point. As I expect you are aware, land on which to build new homes is the life blood of any developer. Put simply, if new land is not regularly secured by a home building business that business will fail. Unsurprisingly, the land market is highly competitive, making buying land a difficult process.

Kier Living has delivered a number of homes that are compliant with Part M4(2) of the Building Regulations. The business has also recently purchased sites where it will be building such homes in the future (one such site will deliver over 300 M4(2) compliant dwellings). We are able to do this because it was made very clear at the land purchase stage that there was a requirement to deliver homes that meet the M4(2) requirements. All of the developers bidding for these sites were aware of this and assessed the value of the sites accordingly. We were (to pick up on a point in your letter) all competing on a level playing field.

Were we to bid for a site where there was no obligation to comply with M4(2) requirements, but decided to apply them nonetheless, we would be very unlikely to win the site in open competition. The margins between winning and losing a site are often very tight and M4(2) compliant dwellings tend to be larger, with more extensive footprints, costing more to build. All things that reduce competitiveness. It may be that on smaller sites in niche areas such things may not be so important, however, we look to purchase sites that range from 50 to 300 units (and occasionally larger) where to be successful it is necessary to be as efficient as possible.

We are supportive of the broader principle of providing housing that meets the requirements of an ageing population, but this really needs to be driven through the Building Regulation process as Part M was back in the day.

Kind regards



Mike Coker  
Operations Director – Kier Living

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<sup>i</sup> Building Research Establishment briefing paper. Available at:

[https://www.bre.co.uk/filelibrary/Briefing%20papers/86749-BRE\\_briefing-paper-PHE-England-A4-v3.pdf](https://www.bre.co.uk/filelibrary/Briefing%20papers/86749-BRE_briefing-paper-PHE-England-A4-v3.pdf)

<sup>ii</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/898205/2018-19\\_EHS\\_Adaptations\\_and\\_Accessability\\_Fact\\_Sheet.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/898205/2018-19_EHS_Adaptations_and_Accessability_Fact_Sheet.pdf)

<https://www.housinglin.org.uk/Topics/type/English-Housing-Survey-2018-19-Accessibility-of-English-homes/>

<sup>iii</sup> [www.moneyadvice.service.gov.uk/en/articles/care-home-or-home-care](http://www.moneyadvice.service.gov.uk/en/articles/care-home-or-home-care)

<sup>iv</sup> [https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/rb\\_july14\\_housing\\_later\\_life\\_report.pdf](https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/rb_july14_housing_later_life_report.pdf)

Based on 2011 data. Updated costs are therefore likely to be higher.

<sup>v</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/762920/Independent\\_Review\\_of\\_the\\_Disabled\\_Facilities\\_Grant.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762920/Independent_Review_of_the_Disabled_Facilities_Grant.pdf)

Based on 2016/17 data

<sup>vi</sup> <https://www.bmgresearch.co.uk/housing-insight-older-people-preparing-homes-staying-put/>

<sup>vii</sup> <https://www.ifs.org.uk/uploads/publications/bns/BN239.pdf>

<sup>viii</sup> Building Research Establishment, [https://www.bre.co.uk/filelibrary/Briefing%20papers/86749-BRE\\_briefing-paper-PHE-England-A4-v3.pdf](https://www.bre.co.uk/filelibrary/Briefing%20papers/86749-BRE_briefing-paper-PHE-England-A4-v3.pdf)

<sup>ix</sup> <https://www.ageing-better.org.uk/sites/default/files/2018-10/Adapting-for-ageing-report.pdf>

<sup>x</sup> <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/communities-and-local-government-committee/housing-for-older-people/written/49158.pdf>

<sup>xi</sup> IMLA, 2019. Intermediary Mortgage Lenders Association, Last-time buyers, the challenges and opportunities for 55+ home-owners wanting to move home. <http://www.imla.org.uk/resources/publications/last-time-buyers-the-challenges-and-opportunities-for-55-home-owners-wanting-to-move-home-imla-april-2019.pdf>

<sup>xii</sup> <https://www.bmgresearch.co.uk/housing-insight-older-people-preparing-homes-staying-put/>