

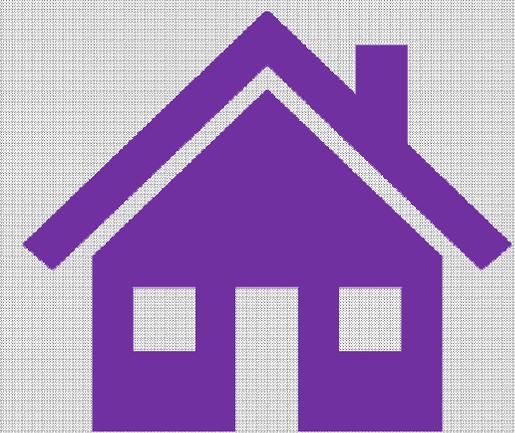
Access Advisory Forum  
9 September 2019

Lisa Hughes

# Accessible homes for RBWM residents with disabilities



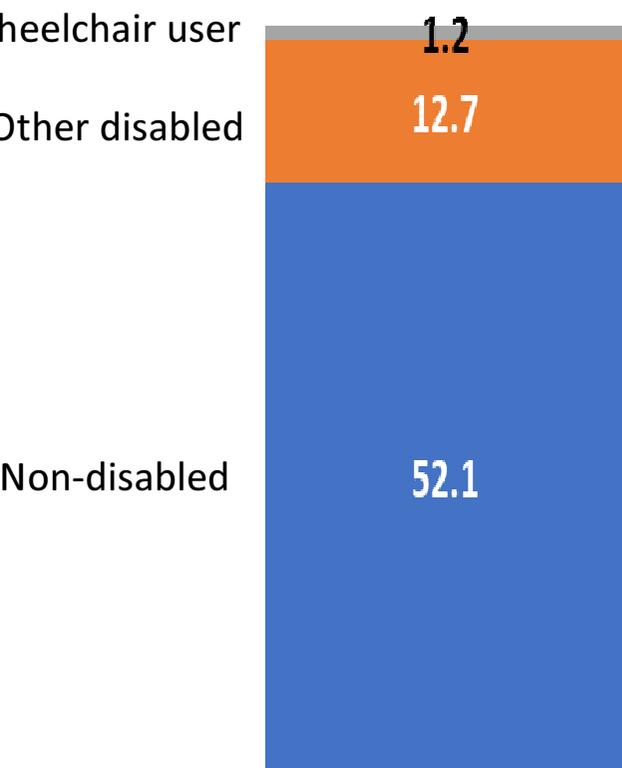
- Disability & accessible homes, the national picture
- Disability & accessible homes in RBWM
- How does RBWM compare with other local authorities ?
- Habinteg report June 2019 : Recommendations
- AAF : Recommendations



# Disability & Accessible Homes : The national piccture

# Disability in the UK population

**1 in 5 people have one or more disabilities**

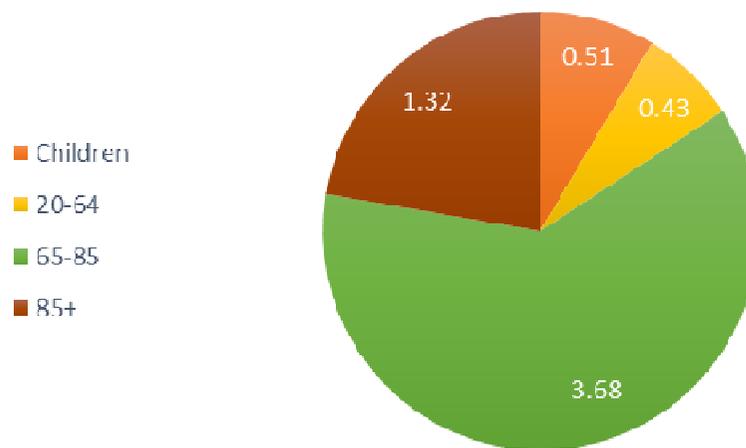


Population in millions

**The likelihood of having disabilities rises as we age**

- 1 in 40 children
- 1 in 6 working age adults
- 1 in 3 adults between 65 & 85
- 2 in 3 adults over 85

## 2016 to 2035 UK population increase



ONS UK Population

This equates to an extra **2 million** older adults with disabilities

# Relevant Law & Regulations

## Legislation

### **1995** : Disability Discrimination Act (DDA)

- From Dec 94 – Unlawful for service providers to treat disabled people less favourably for a reason related to their disability;
- From Oct 02 – Service providers have to make 'reasonable adjustments'
- From Oct 04 – Service providers may have to make 'reasonable adjustments' to the physical features of their premises

### **2005** : Disability Discrimination Act

- Extends the DDA 1995 to cover public transport
- Introduces a duty on public authorities to promote equality for disabled people.

### **2010** : Equality Act replaces DDA

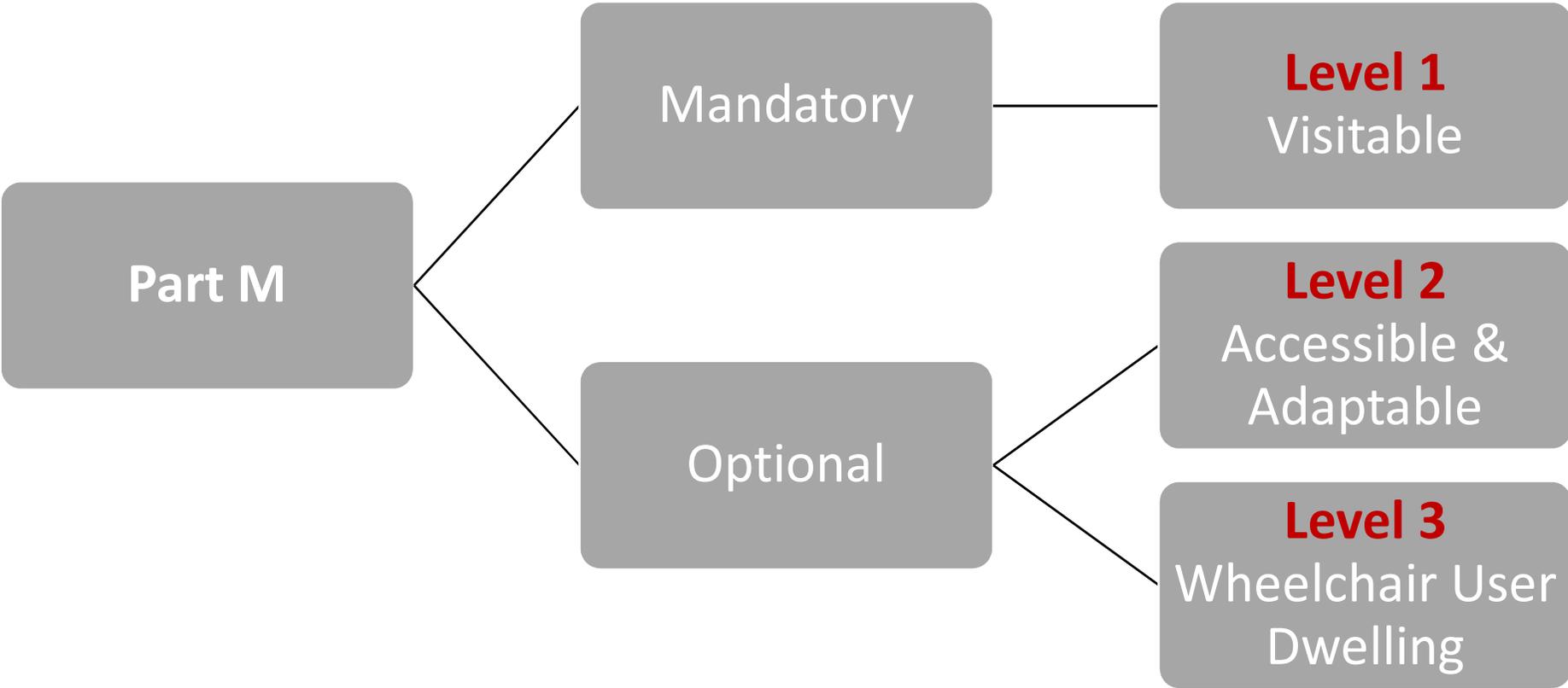
## Building Regulations

**1999**: Approved document **Part M**, Access to & use of buildings, is introduced. It provides a baseline for accessibility in the built environment

**2015** : Compliance with a minimum standard for new homes in Part M becomes mandatory. This enables some people with disabilities to **visit** a new home

*See Appendices for more on Building Regulations*

# 2015 Part M Building Regulations for New Homes



# 2015 Part M Building Regulations for New Homes

**Level 1** Reasonable provision is made for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey

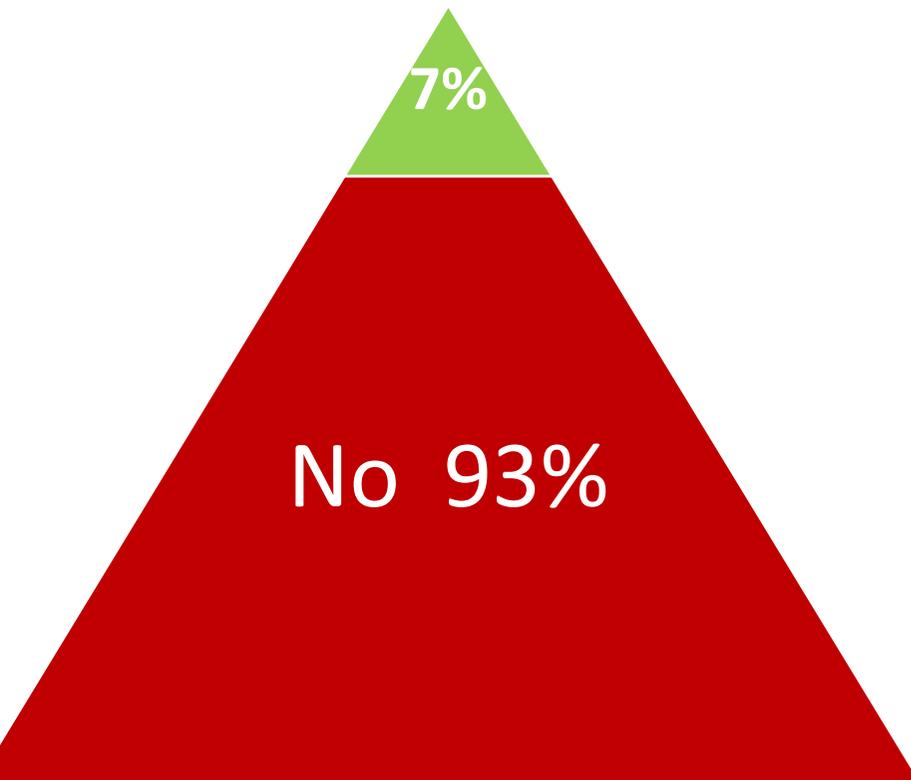
- × Approaches to the building and to dwellings within apartment blocks do not have to be step free
- × Access to rooms and WC on the entrance storey does not have to be step free
- × A WC does not have to have walls strong enough for grab rails or supports
- × Minimum door width (750mm) is much narrower than in a wheelchair user dwelling (850mm)

**Level 2** Reasonable provision is made for people to gain access to, and use, the dwelling and its facilities. The provision made must be sufficient to meet the needs of occupants with differing needs, including some older or disabled people; and to allow adaptation of the dwelling to meet the changing needs of occupants over time.

**Level 3** Splits further into

- Wheelchair Adaptable : The provision is sufficient to allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs
- Wheelchair Accessible : The provision is sufficient to meet the needs of occupants who use wheelchairs.

# Visiting an Existing Home

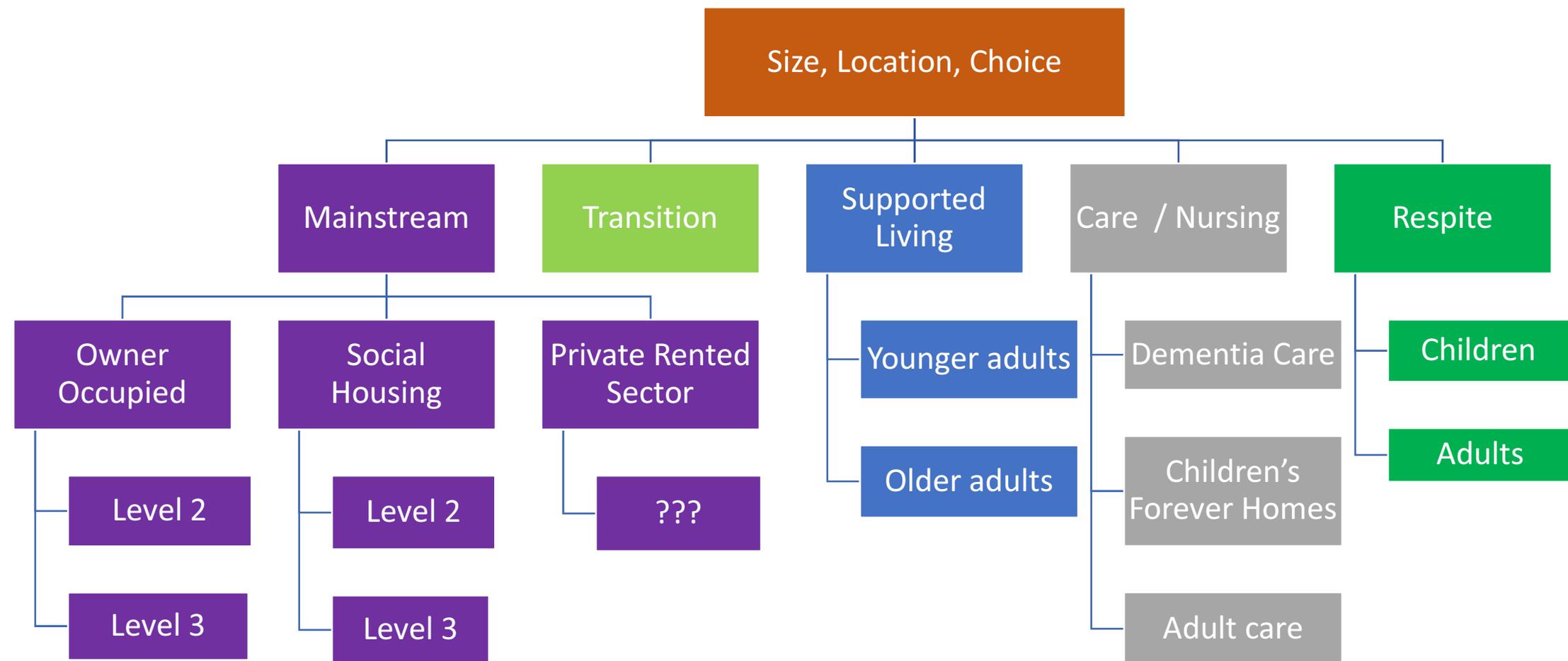


Existing English homes meeting the four "visitable" criteria

72% of UK homes that lack full **visitability** could feasibly be adapted

Terraced houses	50%
Flats	73%
Semi-detached houses	85%
Detached houses	86%

# Differing housing needs of people with disabilities



# Accessible Housing Needs

proportion of PwD have identified accessible mainstream housing needs

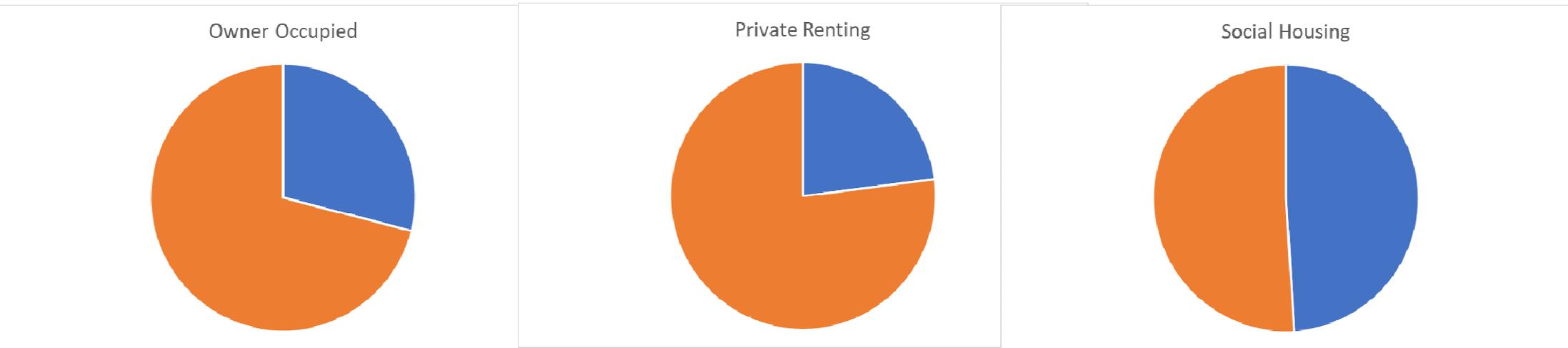
*No data on households containing children with disabilities*

**1 in 5** households with working age PwD

**1 in 3** households with older PwD

# Disabled people in mainstream housing

■ % of Households containing one or more people with disabilities (PwD)



Proportion, by sector, of disabled people who report they are living in unsuitable accommodation

1 in 7

1 in 3

1 in 5

Source : English Housing Survey & EHRC, Housing and Disabled People

# Wheelchair users

- There are 1.2 million wheelchair users in the UK
- **84%** of homes in England do not allow a wheelchair user to get to and through the front door without difficulty
- **4 in 5** wheelchairs users are currently living in a home that does not fully meet their needs
- **91%** have experienced barriers to accessing the Private Rented Sector
  - 62% said this was due to a lack of accessible properties.
  - A respondent commented that a “rental agent withdrew my offer when I turned up in a wheelchair”.
- 50% would like to privately rent a home but only 18% are currently doing so
- Data from local authorities shows a median wait of **5 years** for wheelchair accessible social housing

# Adapting Existing Homes

There is **no data** on the percentage of homes that can feasibly be made **habitable** for PwD. It will be much lower than those which can be made visitable as some key features are far more costly and difficult to retrofit.

Examples :

- widening doorways
- strengthening walls and ceilings
- the configuration and width of staircases

The average cost of adapting a typical home is **5 times higher** than making one adaptable at the design stage

Disabled people often have a long wait, even for minor adaptations in owner occupied homes

- The average time between a Disabled Facilities Grant application and installation is **22 weeks**
  - 8 weeks for a decision and 14 weeks for installation
  - Some local authorities have waiting times of a year or more

# Adapting Existing Homes

There are particular problems in the private rented sector

- Disabled people, occupational therapists and local authorities all reported that private sector landlords are reluctant to allow adaptations
- Short-term tenancies act as a disincentive to installing adaptations
  - The property owner must agree to the adaptations being carried out, and the tenant must confirm their intention to live in the property as their only or main residence for at least three years
- Many buy-to-let mortgages specify a 12-month maximum tenancy, meaning that landlords cannot agree to the three or five-year requirements of the Disabled Facilities Grant

# Additional Issues

- Parents and carers of disabled children face challenges in supporting them to live independently.
  - At local authority level they may face **poorly funded social care** and a **lack of commitment** to independent living to ensure that people can move out of their family home if they wish
- PwD and their carers raised concerns that local authority professionals are insufficiently aware of the needs of people with sensory impairments, learning disabilities or autism spectrum disorders
- Choice Based Lettings (where applicants bid online for properties) can disadvantage people with learning disabilities or visual impairments and often the information about properties doesn't include accessibility
- People can be offered properties that are **miles from their support network or local amenities**, or where the **local area is inaccessible** for them (eg, there are no dropped kerbs)
- A report by the BBC found that some PwD were stranded in psychiatric hospitals for long periods and even years, due to a lack of available housing and support (BBC, 2017). There is a lack of clarity between local authorities and the NHS over about responsibility for commissioning housing for people to leave hospitals and residential settings



# 2035 Forecast of RBWM Residents

	All Residents
	2035 Forecast
Children	37,220
Working Age Adults	92,035
Adults 65-84	31,000
Adults 85+	9,000
<b>Total</b>	<b>169,255</b>

Residents with Moderate or Severe Disabilities		
2035 Forecast	% of all residents	Change from 2017
893	2%	17
14,372	16%	624
11,171	36%	2,806
5,876	65%	3,003
<b>32,312</b>	<b>19%</b>	<b>6,450</b>

*Data sources : POPPI, PANSI, 2011 census, 2014-based Subnational population projections, Table 2: Local authorities and higher administrative areas within England*

# Submitted RBWM Borough Local Plan 2018

**Policy HO2, Housing Mix and Type** : The provision of new homes should contribute to meeting the needs of current and projected households by having regard to the following principles:

- a. provide an appropriate mix of dwelling types and sizes, reflecting the most up to date evidence as set out in the Berkshire SHMA 2016, or successor documents
- b. be adaptable to changing life circumstances
- c. for proposals of 20 or more dwellings, 5% of the dwellings should be delivered as accessible and adaptable dwellings...unless evidence can be provided to demonstrate that the impact on project viability, or of physical or environmental impact would make such provision unsuitable
  - Equates to a maximum **400** new homes built between 2016 & 2035 to be accessible & adaptable
  - There is no requirement for any wheelchair user dwellings to be built
  - Ignores location and dwelling size
  - We were unable to find the data sources used by RBWM to estimate the projected number of accessible & adaptable or wheelchair user dwellings required

Housing Site Allocation HA34 (Sunningdale Park) is the only reference in the Borough Local Plan to possibly **including specialist accommodation for older people**

# Mainstream Housing

How many of us currently live in inaccessible / unsuitable homes ?

Around 26,000 PwD live in RBWM



By 2035 that will increase by 6,450



That's 1 in 5 RBWM residents

14,500 new homes in the RBWM 2018 BLP



Max 400 Level 2 homes are proposed

Zero Level 3 homes are proposed



That's 1 in 36 new homes

**London**

Has one Level 2 or 3 home for every **24** residents

**RBWM**

Will have one Level 2 home for every **342** residents

# Types of non-mainstream housing

Children	Young Adults	Older Adults
	Transition	
	Supported Living	Supported Living
Forever	Care / Nursing	Care / Nursing / Dementia
Respite	Respite	Respite

What is the need for each now and in the future in the Borough ?

What is the current & planned provision ?

# Submitted RBWM Borough Local Plan 2018

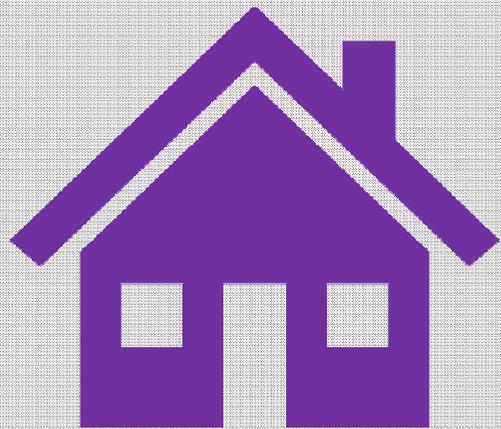
**Policy HO2, Housing Mix and Type** : The provision of new homes should contribute to meeting the needs of current and projected households by having regard to the following principles:

- a. provide an appropriate mix of dwelling types and sizes, reflecting the evidence as set out in the Berkshire SHMA 2016, or successor documents
- b. be adaptable to changing life circumstances
- c. for proposals of 20 or more dwellings, 5% of the dwellings to be delivered as accessible and adaptable dwellings...unless evidence can be provided to demonstrate that the impact on project viability, or of physical or environmental impact would make such provision

- Equates to a maximum **400** new dwellings between 2016 & 2035 to be accessible & adaptable
- There is no requirement for wheelchair user dwellings to be built
- Ignores location and density
- We were unable to find the sources used by RBWM to estimate the projected number of accessible & adaptable wheelchair user dwellings required

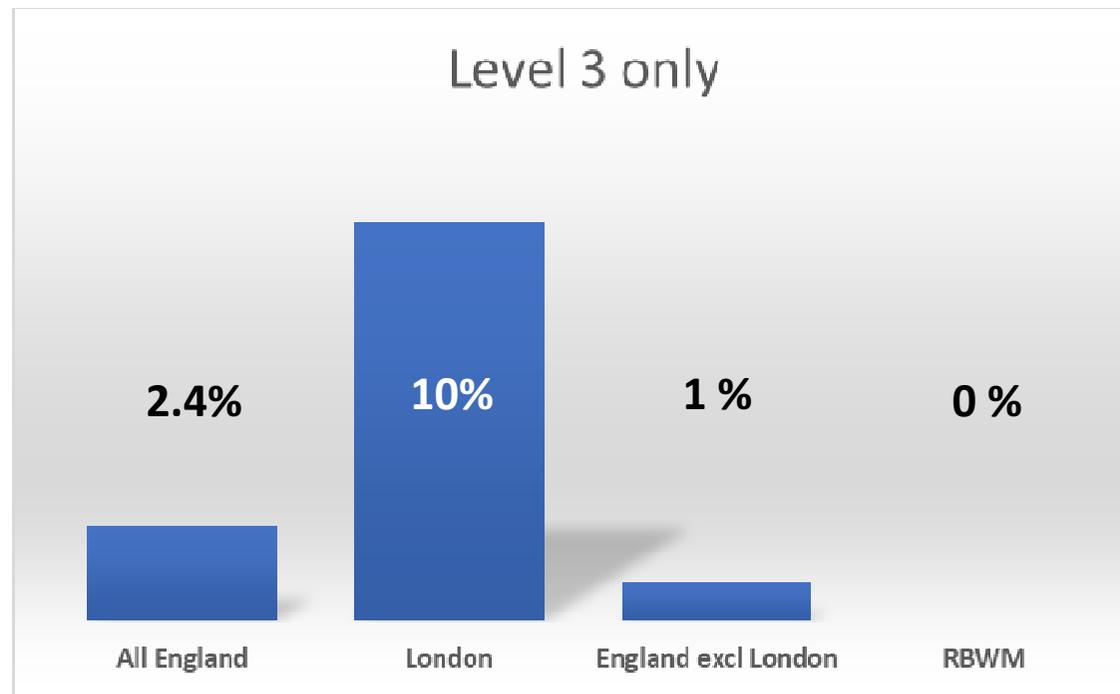
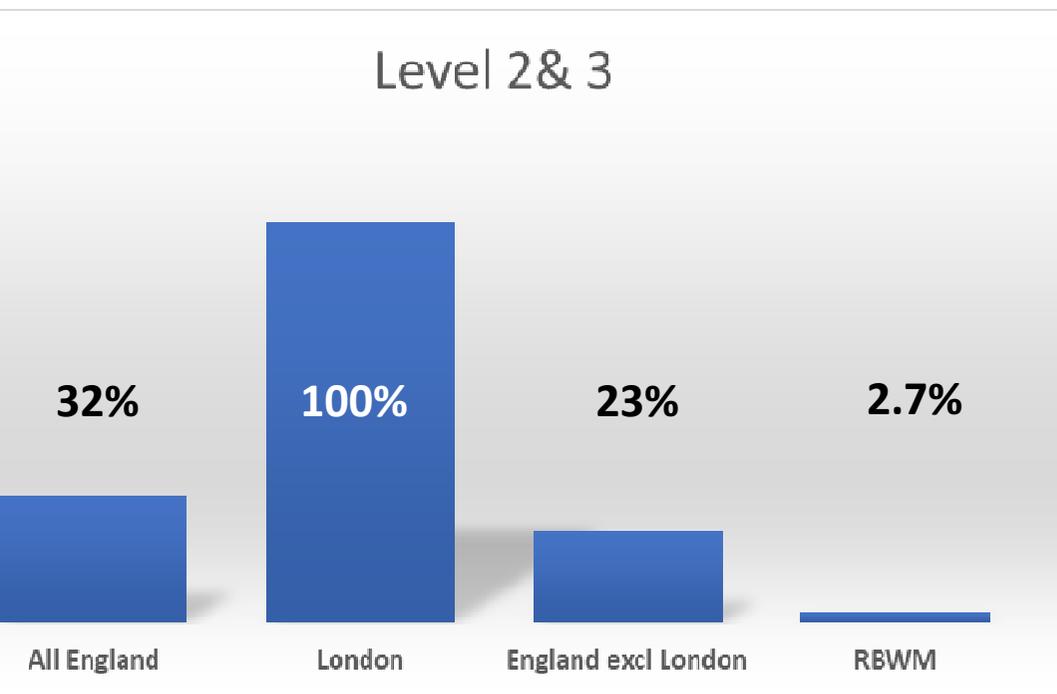
Housing Site Allocation H... (Winningdale Park) is the only reference in the Borough Local Plan to possibly **including specialist accommodation for older people**

**Nowhere near enough!**

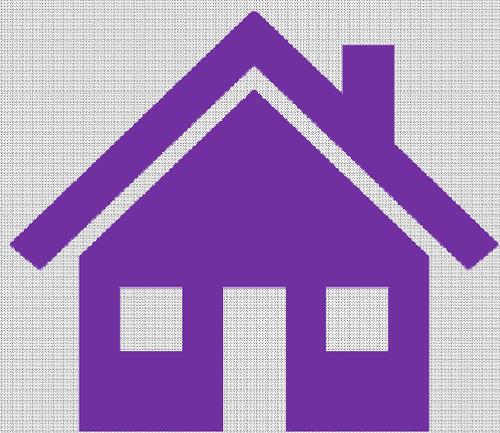


How does RBWM  
compare with other  
local authorities ?

# Accessible New Homes Planned in England to 2030



Sources : RBWM data from the 2018 submitted Borough Local Plan. All other data from the June 2019 Habinteg Report "A forecast for Accessible Homes".  
Note : The London standards of 90% at Level 2 and 10% at Level 3 have been applied since 2004.



# Habinteg\* Report : A Forecast for Accessible Homes (June 2019)

\* See Appendices for information about Habinteg

“As rates of disability increase it is vital to ensure the accessibility and adaptability of new homes.

Otherwise disabled & older people will be increasingly excluded from ordinary aspects of daily living with negative consequences for individuals, families, communities & public services”

# Habinteg : Recommendations for Central Authorities

- The **Government** to make Accessible & Adaptable M4(2) the mandatory baseline for all new homes, and for planning authorities to ensure an adequate number of Wheelchair Accessible Dwellings M4(3) are built to meet local needs. This policy has been in place since 2004 in London and we believe it works there because :
  - M4(2) works as a basic design standard for all homes, with only a marginal difference in space requirements
  - **The build costs are not prohibitive and can be as little as £520 per property**
  - .The design makes it cheaper and easier to adapt if the needs of the household changes, providing better value for money and increased sustainability over time
  - It creates a level playing field for all housing developers to deliver homes on an equal footing

Until this national mandatory baseline is achieved :

- The **Secretary of State** to issue guidance to Local Planning Authorities (LPA) on how they should reflect the housing needs of older and disabled people in their plans (as per the Neighbourhood Planning Act 2017)
- The **Planning Inspectorate** to challenge any LPA if their plan fails to set requirements for the delivery of a proportion of all new homes to meet M4(2) & M4(3) standards.

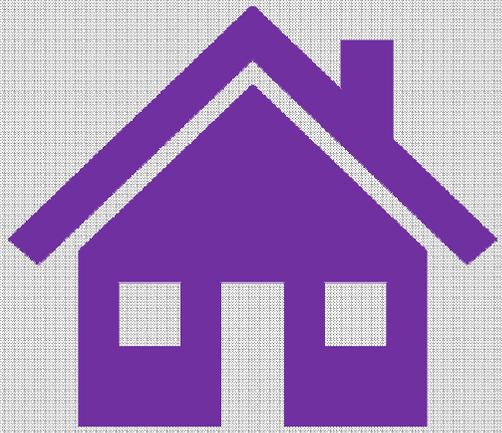
# Habinteg : Recommendations for Local Authorities

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

Potential  
Access Advisory Forum  
Recommendations for  
RBWM

# Potential recommendations and questions to RBWM

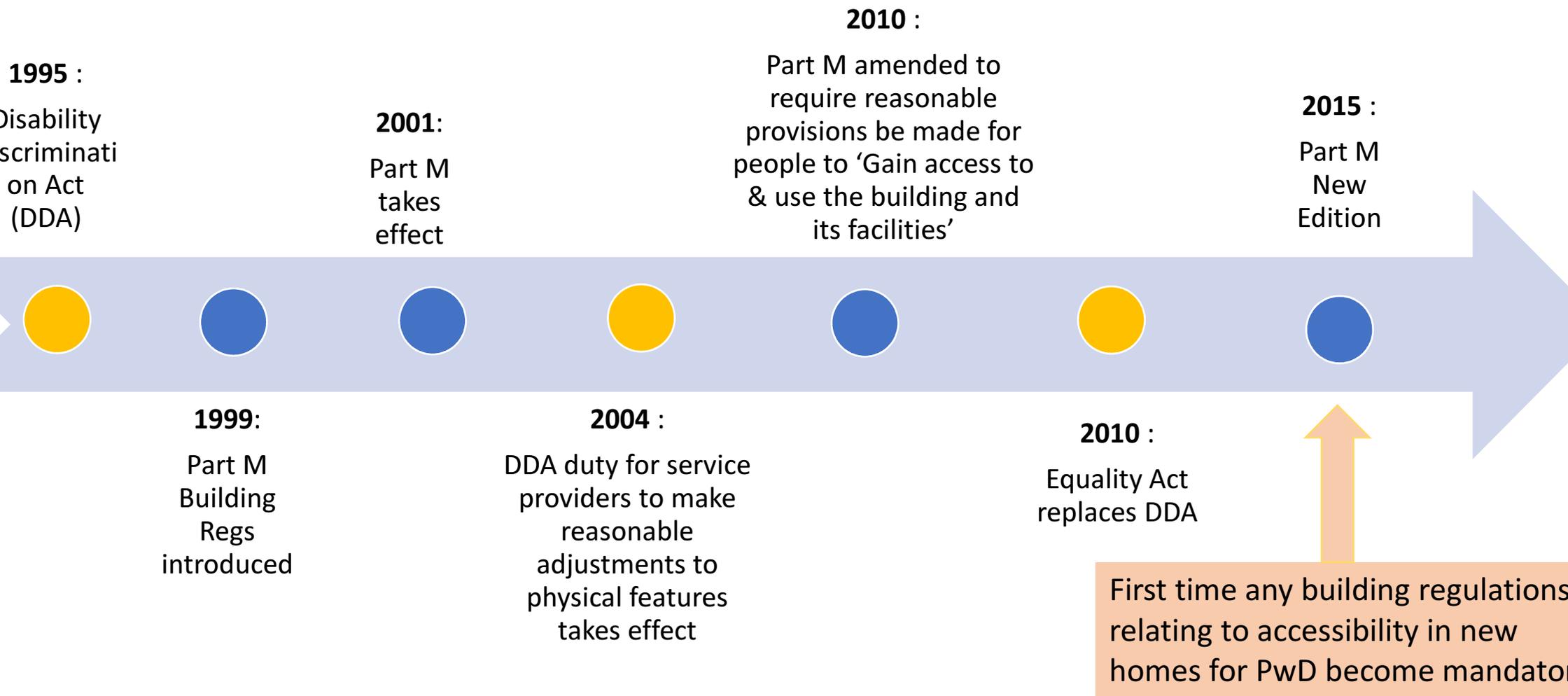
- Adopt the same policy as London have had since 2004
  - 90% of new homes to be built Level 2 standards
  - 10% to be built to Level 3 standards
- Reassure developers about the viability of this approach
  - Developers in London have been doing this for 15 years
  - Government data shows that a Level 2 home can be built for as little as £521 more than building to the mandatory standard.
  - There is no evidence that any additional costs cannot be recouped from the home buyer
  - There is only a marginal difference in space requirements
- Engage with the Access Advisory Forum & other local organisations to identify and plan to meet the current & future needs for
  - Transition accommodation
  - Supported Living
  - Care / Nursing home places
  - Respite care
- Does RBWM have an accessible housing register ?



---

# Appendices

# Historic Timeline : Building Regulations / Legislation relating to Home Accessibility for People with Disabilities (PwD)



# Building Regulations (in England & Wales)

Building regulations are statutory regulations that seek to ensure the policies set out in the Building Act 1984 are carried out. They are periodically reviewed and amended, 2016 is the latest update

The regulations are scheduled within 16 Approved Documents, each designated by a letter ("Part A" to "Part R"). They cover aspects such as

Structure	Fire safety	Toxic substances	Sound isolation
Ventilation	Drainage	Sanitation	Electrical safety
Security	Glazing	Energy efficiency	<b>Access to &amp; use of buildings</b>
High speed broadband infrastructure			

The approved documents present the expectation of the Secretary of State concerning the minimum standards required for compliance with the Building Regulations.

# Who are Habinteg ?

“We are a housing provider with a strong vision and ambitious aims.

We want communities to include disabled people, offering places to live that meet their needs and provide the highest levels of independence, choice and control over their daily lives.

Our mission is to champion inclusion by providing and promoting accessible homes and neighbourhoods that welcome and include everyone.

Our policy work supports our commitment to independent living and inclusive design. We produce and promote evidence to influence legislation, national and local housing policy and support best practice in accessible housing.

We work with central, regional and local government to support the development of inclusive policy and good practice. We also partner with other organisations to campaign for amendments to proposed legislation or the introduction of new or revised policies. “

# Habinteg Report Methodology

Between January & April 2019 Habinteg assessed all 322 Local Plans from Local Planning Authorities across England.

The approach was to identify and analyse data available in published Local Plans relating to planning policies for accessible homes and to use this data to estimate the trajectory for delivery of accessible housing from 2019-2030.

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

Data capture and analysis focused on references to and requirements set to deliver homes using either

- superseded Lifetime Homes Standard and Wheelchair Housing Design standards, or
- current Building Regulations Part M4 Volume 1 M4(2) Category 2 or M4(3) Category 3.

# Habinteg : Societal benefits of building more accessible homes

- Help alleviate pressures on health and social care
  - Speeding up hospital discharge,
  - Enabling greater independence at home
  - Making necessary later adaptations quicker and more economical
    - Stronger bathroom walls which make the addition of grab rails easier
    - Stairs that can easily accommodate a stair lift.
- Benefit many people beyond disabled residents
  - Families with young children
  - Older residents
  - Wide range of older and disabled visitors
- Support community cohesion and intergenerational contact, helping to combat isolation and enhance wellbeing.