

House of Commons Women and Equalities Committee: Disability and the Built Environment Enquiry

The Royal Institute of British Architects champions better buildings, stronger communities and higher environmental standards through the practice of architecture and our 40,000 members. We provide the standards, training, support and recognition that put our members – in the UK and overseas – at the peak of their profession. With government and our partners, we work to improve the design quality of public buildings, new homes and new communities.

The RIBA welcomes this inquiry. We embrace all aspects of the agenda for inclusive design, which we consider to be fundamental to successful architecture. This is reflected in our extensive commitment to inclusive design in CPD, as well as other activities, such as our “Better design to improve the hotel experience for disabled and able-bodied guests” competition in partnership with the Bespoke Hotel group.

To create a built environment that works for everyone, we recommend that Government should:

- Require local authorities to set up and maintain an Accessible Housing Register;
- Provide funding for accessible affordable housing;
- Make it easier for local planning authorities to adopt the higher accessibility requirements in Building Regulations, M4(2) and M4(3), while placing a stronger duty upon them to address the needs of disabled and older people in plan-making;
- Incorporate the Nationally Described Space Standards into the Building Regulations;
- Support efforts to develop a proper evidence-base for disabled and inclusive access in the built environment.

Government policy on and current provision of accessible properties (including homes and commercial premises)

1. We do not have adequate provision of accessible housing in the UK. English Housing Survey Data shows that there are 300,000 households where an adult with a disability has an unmet need for accessible housing. It has also been estimated that half of disabled children live in housing which is unsuitable for their needs.
2. We know far too little about whether those who have an accessible home are living in a geographical location that meets their wants and needs, or in a built environment which allows them to participate fully in community life. Both are necessary if we are to build inclusive, sustainable communities.

How adequate is the supply of accessible properties (including homes and commercial premises)?

3. There is a lamentable lack of data on the supply of new accessible homes. This compares unfavourably with the extensive data collected on the supply of new affordable housing.
4. Without such data, it is impossible to say for sure whether the UK is making progress in clearing the substantial backlog of undersupply of accessible housing, while meeting the accessibility needs of an ageing population.
5. It is good practice for local authorities to set up and maintain an Accessible Housing Register. However, few local authorities actually do. Moreover, those that do use different categories and criteria for accessibility.
6. The RIBA recommends that maintaining an Affordable Housing Register become a legal duty, and that the register must conform to a nationally defined set of classifications which are based on the new optional requirements for accessibility in Part M of the Building Regulations.
7. Despite a wave of activity to adapt commercial buildings as a result of the 1995 Disability Discrimination Act, our members report that many premises are still inaccessible to many disabled people.

To what extent is the Government taking current and future needs for accessible homes into account in its policies on increasing housing supply?

8. The Government has not set any overall targets for accessible homes to be built. In contrast, it has set a target of 200,000 starter homes.
9. We welcome the Government's commitment to fund the building of 8,000 units of Specialist Homes for older, disabled and vulnerable people as part of its flagship Shared Ownership and Affordable Homes Programme 2016 to 2021. This represents 5 per cent of the volume of homes built under that Programme.

10. However, many disabled and older people are also reliant on mainstream affordable and social rented housing, funding for which is not available under the Programme, as it was under its predecessor.

11. There have been recent indications that the Government may change the parameters of the Programme to allow Housing Associations to bid for funding for affordable rented housing. The RIBA would welcome such a move.

12. On the whole, planning for accessible housing needs has been left to local planning authorities, under direction from the National Planning Policy Framework to 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)'. This is supported by the national standards in the Building Regulations.

How effective are the planning and building regulations systems in ensuring the provision of new accessible / lifetime homes?

13. The RIBA welcomes the recent integration of the rules for accessible housing into Part M of the Building Regulations. This demonstrates in principle that accessibility is considered by government to be a very important issue.

14. We believe that the three new set of requirements, by and large, are well considered and fit for purpose.

15. An exception is that space is sometimes inadequate. For instance, space for the WC in building regulation M4 (1) is insufficient to provide a decent level of visibility.

16. The policies which enable local planning authorities to adopt the higher requirements, M4(2) and M4(3), are far too cumbersome and demanding. As it stands, every local planning authority has to prove need and viability before requiring any new dwellings to meet M4(2) or M4(3). Guidance in the National Planning Policy Framework is vague and places undue emphasis on proving viability.

17. London has been able to demonstrate need and viability for new housing to be 90% M4(2) and 10% M4(3) despite having the youngest population in the country. It is questionable whether London's policy is proportionate. However, as the planning inspector for the EiP determined it is reasonable, it seems unnecessary that other local planning authorities must go through an extensive process to prove the need and viability of accessible housing requirements which may be far lower.

18. Outside London, just 3 per cent of English local authorities have policies to deliver and monitor the number of accessible homes built.¹ It is unclear whether this is due to a lack of focus on the issue, because of the difficulty in incorporating accessibility requirements into local plans, or both.

¹ <http://www.habinteg.org.uk/news/new-evidence-shows-councils-lack-plans-to-meet-accessible-housing-demand-1050>

19. The RIBA believes that it should be sufficient to determine a need (determined by demographic analysis) to be met over a reasonable period for local authorities to adopt accessibility requirements. The Government should define what a reasonable period is (for instance, 20 years) to ensure consistency in the way that the trajectory is set.

20. This should be complimented by a stronger duty upon local planning authorities to address the needs of older and disabled people in plan-making and land allocation.

21. Local authorities could be assisted in this duty through a distinct, clear planning use class for housing for older people that is designed to Housing our Ageing Population: Panel for Innovation (HAPPI) principles.

22. The RIBA also believes that the Nationally Described Space Standards should be incorporated into the building regulations as compulsory requirements. Since adequate space is required to meet Building Regulation requirements M4(2) and M4(3), these are mutually reinforcing policies.

23. Finally, it is not sufficient to simply provide adequate numbers of homes which are accessible for those with disabilities. They must be correctly located. Many disabled people need to be very near family, support systems, bus stops and shops. When any of those parameters are missing, accessible properties may go unsold or unoccupied, even when there is overall demand for accessible properties in the wider area. This is a challenge that both planners and developers must work to tackle.

The effectiveness of UK legislation, policies and standards on accessibility in the built environment

How well do Part M of the Building Regulations and Approved Document M perform in providing reasonable levels of accessibility in the built environment and what could be done to improve performance?

24. Part M is useful as a baseline for accessibility. One exception to its adequacy is that, as wheelchairs have become larger and more sophisticated, the 1500 diameter turning circle is now too small in many cases.

25. It is important to emphasize that this is a minimum baseline and does not represent best practice. Moreover, some commentators are of the view that simply following Part M will not meet always ensure that the building will meet the requirements of the Equality Act

26. Recognition of best practice, and particularly sector guidance in establishing reasonable adjustments, would help ensure new buildings represent best practice.

Is there sufficient compliance with building regulations and requests for reasonable adjustment? If not, what more could be done to increase compliance?

27. Our members report that in the past there was poor compliance, because few local planning authorities were able to employ access consultants or occupational therapists to check compliance.

28. Now that levels of home accessibility are a statutory requirement and enshrined in the Building Regulations, compliance will be monitored by Building Inspectors. Where they lack expertise it is hoped that they will supplement their skills with occupational therapists and Access consultants. There should then be fewer complaints or problems with compliance.

Do current standards regarding accessibility in the built environment take account of the full range of disability and impairment needs? (For example, are the needs of people with dementia, the visually impaired, those with mental health issues and older people given sufficient consideration? If not, what more could be done to increase inclusivity?)

29. No. The standards in the Building Regulations cover a small number of disabilities. The Government may wish to explore the possibility of extending Building Regulations for a wider range of disabilities in very specific cases, such as requiring simple and logical layouts in common areas of flats for people with sensory impairments and mental health issues.

30. In general, however, it is unrealistic to expect regulations to go beyond that which they do currently in terms of the range of disabilities they seek to address, and it is important to distinguish between specialist housing provision and that for general need.

31. Specialist housing tends to have specialist clients, but they are not always as well informed as they could be on inclusive design for specific disabilities. There are no specific standards for specialist housing provision, other than guidance provided by providers.

32. Some good practice guidance has been produced by organisations such as British Standards Institution and sector bodies such as Sport England. However, there is a lack of research in certain areas, including the needs of children, and a lack of uniform approach.

The RIBA would welcome further efforts to develop a proper evidence-base for disability access in the built environment. This could include post-occupancy evaluations of both residential and non-residential developments.

33. It is also the case that the adaptability of new-build housing is limited by lack of interior space. As stated above, the RIBA believes that the Nationally Described Space Standards should be adopted as compulsory measures within the Building Regulations, which would help address this problem.

34. The Government should support initiatives to develop housing that will maximise the period of Independent Living for people with dementia and other age related diseases, without the need to move which only aggravates their disability.

What is the role of reasonable adjustments in delivering accessibility?

35. Reasonable adjustments relate to legislation not standards, and should only be used in existing buildings where there are inherent barriers to be overcome.

36. The use of occupational therapists and Access Consultants in more projects would go a way to improving schemes and knowledge of design teams.

37. Reference to and familiarity with existing guidance and better training for all participants would

also make a difference. Documents like BS 8300 and the LLDC's Inclusive Design Standards are essential references.

Design and management of the public realm

Are the needs of all groups given adequate consideration in the design of streets, highways, parks and publicly accessible open spaces and in the provision of services such as public toilets?

38. The needs of all groups are not always given adequate consideration. For instance, we still see the following in developments:

- a. High contrast chevron patterns on shared paving which cause confusion to people with dementia or visual impairment.
- b. Rows of railings that can be indistinguishable from the gates leading to entrances.
- c. Play equipment in public parks which may be wholly unsuitable for disabled children.
- d. Public toilets which, while meeting baseline technical requirements, may be extremely difficult and burdensome for disabled people to access.

39. Access Consultants and Access Groups can input both before and after planning applications are submitted to ensure a more inclusive built environment.

- To what extent do shared space schemes in roads and highways cause barriers for disabled people and how can these be resolved?

40. There is a diversity of views about shared spaces in the architectural profession. Some argue that they are antithetical to efforts to create an inclusive built environment, due to the confusion they can create for guide dogs, for example. Others point out that in certain situations they are beneficial for those with a range of mobility disabilities, and argue that they can be the right choice.

41. What is certain is that they can be executed with greater or lesser sensitivity to the needs of those with disabilities, and that where executed poorly they are distressing and dangerous. For instance, it is essential to build in effective, but subtle, speed restrictions and make maximum use of audible warnings, and tonal and textural contrast.

42. Where shared surfaces are proposed, inclusive design considerations should be paramount.

43. The evidence base is not as clear as it should be. We would welcome further research in this area.

The role of designers, architects and built environment specialists in ensuring accessibility and inclusivity

To what extent is the need for accessibility taken into account in the design of buildings and public spaces? What can the professionals who are responsible for the creation, maintenance and retrofitting of our built environment do to ensure that buildings and public spaces are as accessible and inclusive as possible?

44. Architects have a significant role in providing creative solutions to ensure the built environment meets the needs of clients while providing accessible spaces for all.

45. Greenwich Housing, designed by Bell Phillips Architects, is a good example of what can be achieved when the need for accessibility is fully taken into account. It provides clean, simple and elegant housing for elderly and disabled people, supplying much needed homes for social rent for people over 60. The building is flexible, allowing the same typology to sit harmoniously on six different sites, with changes in brickwork to create relationships with its immediate context. The scheme won a 2016 RIBA National Award.

46. In partnership with the Bespoke Hotel group, the RIBA is running a “Better design to improve the hotel experience for disabled and able-bodied guests” competition. The Award seeks to challenge the perception of hotel facilities set aside for disabled people, which can often be viewed as joyless, poorly designed and over-medicalised.

46. However, the degree to which architects can influence the accessibility of new buildings is dependent on the client. It is difficult if the client does not see the need or understand the added value to inclusion.

How well is inclusive design built into training for built environment specialists such as planners, designers, architects and building inspectors? Is there sufficient continuing professional development on inclusive design for such specialists? What tools and techniques are needed to infuse inclusive design into education and training programmes?

47. The RIBA does not determine the curricula in schools of architecture; this is entirely correct, as it respects the prerogative of the academic community to set their own priorities.

48. However, those priorities must map against our Graduate Attributes and General Criteria (set out in the RIBA validation procedures). Among criteria that of necessity incorporate inclusive design are that:

- a. The graduate will have knowledge of principles associated with designing optimum visual, thermal and acoustic environments.
- b. The graduate will have the skills to prepare designs that will meet building users’ requirements and comply with UK legislation, appropriate performance standards and health and safety requirements.
- c. The graduate will have knowledge of the fundamental legal, professional and statutory responsibilities of the architect, and the organisations, regulations and procedures involved in the negotiation and approval of architectural designs, including land law, development control, building regulations and health and safety legislation.

49. Inclusive design is one of the ten mandatory yearly RIBA CPD core curriculum topics. RIBA members are required to do at least two CPD hours in this topic each year; depending on what they do in the practice, and what knowledge they need, they will probably exceed that. Inclusive design is also interwoven within some of the other mandatory topics: compliance, place-making, external management, and conservation and the historic environment. Comprehensive syllabus gives our members plenty of scope for study, and us plenty of scope for provision.

50. The RIBA has provided a great deal of relevant CPD over the years, every year, from free Providers Network delivery from manufacturers on up to longer courses. This year's core CPD topic, delivered in 14 cities is Inclusive access to existing buildings: how to achieve real change.

51. Manufacturers providing free CPD in the Providers Network are required to address access/inclusion issues relevant to their product. A large number of Network Providers are now doing free-to-book seminars on various aspects of inclusive design as they relate to product knowledge and specification: design for aging and design for dementia are two popular topics. Other specific ones relate to colour and contrast; building acoustics; signage and wayfinding.