

Royal Institute of British Architects

Response to Levelling Up, Housing and Communities Committee inquiry: disabled people in the housing sector

The Royal Institute of British Architects is a global professional membership body driving excellence in architecture. We serve our members and society in order to deliver better buildings and places, stronger communities and a sustainable environment. Being inclusive, ethical, environmentally aware and collaborative underpins all that we do.

RIBA welcomes the opportunity to provide evidence to this inquiry. We have long campaigned to raise accessibility standards in the housing sector, including as a founding member of the [Housing Made for Everyone \(HoME\) Coalition](#). We urge the Committee to engage with the Coalition as part of the evidence-gathering process in this inquiry.

We were pleased by the Government announcement in July 2022 that all new homes must be compliant with Part M4(2) of the Building Regulations. This is welcome progress towards ensuring that everyone is able to access a home that meets their needs. However, there is still a great deal of work to undertake to meaningfully centre disabled people in the housing sector.

As such, RIBA recommends that the Government:

- Launches the awaited consultation on the implementation of raised minimum accessibility standards for all new homes.
- Invests in building up the capacity of local authority planning departments, particularly with qualified design expertise.
- Takes steps, with guidance and input from the housing and disability sectors, to examine how to better facilitate home adaptations for a) older housing stock and b) disabled tenants in the private rented sector.
- Examines what more can be undertaken to incentivise developers to prioritise sufficient provision of accessible homes.
- Ensures that sprinklers are standard in all settings where vulnerable people are living.

What can the Government do to ensure disabled residents across England have access to accessible and adaptable housing?

The reality is that millions of people, particularly those who are older or disabled, live in homes that do not meet their daily needs, facilitating independence and a high quality of living. England's existing housing stock is not suitable for the diverse and changing needs of our population, and often the new homes we build do not meet high standards of accessibility. Architects have a key role to play in ensuring that homes are designed to be accessible to all and meet the needs of the whole population. The [2023 English Housing Survey](#) found that 1.3 million households with someone who has a long-term illness or disability lived in a non-decent home – a total of 15% of the population. There is a pressing need to rectify the current situation.

Resolving the need for more, including new, accessible housing requires investment in the planning system and a greater role for design expertise in the development of new housing. The current lack of qualified design expertise in planning departments is concerning, and as the role of architects in the delivery of mass-market housing has declined, it is not just design standards that have suffered: we have also seen growing challenges around the sustainability, safety and quality of new homes. This has a knock-on impact on the ability of local planning authorities (LPAs) to facilitate the design and building of accessible homes.

While resourcing and upskilling LPAs is a long-term solution, which we will expand upon later in this response, there is work that the Government can undertake now. The Government announced in July 2022 that all new homes must be compliant with Part M4(2) of the Building Regulations. These higher M4(2) requirements include a living area at entrance level, step-free access to all entrance level rooms and facilities, wider doorways and corridors, and clear access routes to windows. The requirements will also require features to make homes more easily adaptable over time. The M4(1) standard will apply by exception only, where M4(2) is deemed to be impractical and unachievable, and developers will need to justify its use on a home-by-home basis.

Mandating adaptability of homes has a clear benefit for people living with reduced mobility and chronic health conditions, providing stability, space and flexibility to changing circumstances. We therefore urge the Government to prioritise launching the awaited consultation on the implementation of Part M4(2) as a minimum accessibility standard for new homes.

In the longer-term, we recommend the Government progresses measures to ensure the provision of homes which meet Part M4(3) standards, by which homes become fully wheelchair accessible. Further information on the benefits of Part M4(3) housing, authored by RIBA for Accessible Homes Week, is available [here](#).

We have responded in further detail on what the Government can do to ensure that existing housing stock can be made accessible and adaptable later in this inquiry.

Does the National Planning Policy Framework ensure the Equality Act 2010 is complied with when building housing?

It is vital for both the current National Planning Policy Framework (NPPF) and any upcoming revisions of the NPPF that ensuring an adequate amount of accessible housing is an absolute priority. As our colleagues at Habinteg have raised, the current NPPF only mentions Part M of the Building Regulations in a footnote, and we are concerned that this low level of attention will not deliver an increase in accessible homes.

‘Access for all to adequate, safe and affordable housing’ by 2030 is a UN Sustainable Development Goal. All efforts should be taken to ensure that a commitment to securing genuinely affordable housing of all tenures and types to be available to those on all incomes is treated with the gravity that it deserves.

Colleagues at the Chartered Institute of Building (CIOB) have raised that there is ‘a considerable amount of confusion’ regarding the planning requirements in England for accessible homes. Further, the CIOB notes that the NPPF does not require adequate information at planning application stage to determine whether requirements such as accessibility will be met. We support its call to strengthen the collection of information at the planning stage through the NPPF to ensure sufficient supply of accessible housing.

We look forward to engaging with the outcome of the March 2023 consultation on revisions to the NPPF and any further consultations to ensure that accessible housing is treated as an integral part of national planning policy.

Since the Government consultation ‘Raising accessibility standards for new homes’ (July 2022), what has been done to improve housing provisions for disabled residents in England? And has it been sufficient?

RIBA welcomed the announcement in July 2022 that minimum accessibility standards of all new homes would be raised to meet Part M4(2) of the Building Regulations. This is a significant step in terms of making new homes broadly more accessible.

However, it is disappointing that the announced consultation on implementation of the new minimum standard has not been launched. Given that there will likely also be a transition period, we are concerned that further delays will unacceptably impact the length of time during which disabled people will continue to have inadequate access to suitable homes – and that in the meantime, homes that are in the process of being built will not meet accessibility standards.

We were pleased to see the establishment of the Older People’s Housing Taskforce in the intervening period but support this Committee’s previous [recommendation](#) that a separate taskforce should be established to support issues specific to disabled people’s housing provision. This would ensure that issues pertaining to housing for all disabled people receive the attention and nuance that they deserve. These taskforces must be equipped with the resource and cross-department focus needed to make substantive improvements to existing housing stock and any planned new developments.

What role should the Government, Local Authorities and developers have for ensuring the delivery of suitable housing for disabled people?

We must focus on ensuring that local authorities have qualified design expertise to recognise and promote housing which is suitable for the needs of disabled people. The Government has a clear role to play here, in comprehensively resourcing planning departments to ensure that they can recruit and retain the necessary expertise.

Planning departments have experienced one of the most severe cuts in terms of real terms budget allocation in recent years, which has had a clear impact with regards to both current capacity within LPAs but also the recruitment and retention of qualified design professionals. Numerous assessments have revealed that there is a concerning lack of specialist design expertise within local government, which will in turn have a significant impact on the quality and delivery of accessible housing.

In addition to this, there is work that can be carried out in the existing planning system. As Habinteg [analysis](#) has found, in 2023 the amount of adopted local plans in England specifying M4(2) standards is 40%, while 162 of England's 324 local plans have no targets for M4(3)-compliant homes – showing more can clearly be done. Local authorities should ensure that sufficient specialised housing for older and disabled people is allocated through local plans, including allocating specific sites for suitable housing across all tenures. We were pleased to see the inclusion of a clause to support the supply of specialist housing for older people in the revised text of the NPPF earlier this year – however, we would welcome explicit assurances in the revised NPPF that homes which are suitable for disabled people will also be facilitated through the planning system.

There is also a role for developers to play in delivering suitable housing for disabled people. 2018 [research](#) by the Equalities and Human Rights Commission stated that many developers do not view accessible housing as profitable and as such, take steps to negotiate down the number of accessible homes built. This research also illustrates the discrepancy between the amount of developers at the time who do not deliver sufficient amounts of accessible housing – calculated at 68% - and the amount of local authorities who subsequently take action against developers on accessibility grounds – at just 3%. This clearly shows the consequences of LPAs not receiving adequate resource to ensure that accessible housing is delivered.

Collaborative working between national and local government is vital to achieve accessible housing provision. We continue to recommend that national and local government should support the development of a national accessible housing register, so that it is easier for disabled people to find and apply for suitable housing, in all types, tenures and locations.

There is also a clear role for national and local government in facilitating the provision of sprinklers as standard in settings which house vulnerable people. In our recent [response](#) to the Department for Levelling Up, Housing and Communities (DLUHC) consultation on sprinklers in care homes, removal of national classes, and staircases in residential buildings, we advocated for sprinklers to be used across new and converted buildings, particularly where there is a higher risk to vulnerable occupants. We would be pleased to see the Committee support this recommendation.

RIBA recently released the [Inclusive Design Overlay](#) to the RIBA Plan of Work, which is a resource for all built environment professionals to support better long-term inclusion and access outcomes. Such

resources are highly valuable for built environment professionals at every part of the processing of designing and building accessible places.

How can the Government ensure it provides sufficient provisions to support disabled residents who do not live in new build homes?

The UK has the oldest housing stock in Europe, and 80% of the buildings we will use in 2050 have already been built. That means that we must ensure that the housing stock that is already in use meets the needs of disabled people. At present, figures released in the [2020 English Housing Survey](#) showed that an overwhelming 91% of homes do not provide the four main features for even the lowest level of accessibility – a home that is ‘visitable’, which is cause for concern.

As such, it is vital that we take steps to make it easier for homes to be adapted to meet the needs of residents. Research has shown that there are often multiple barriers placed in the way of procuring adaptations, and that adaptations are often refused. Confusing funding structures, splits in legal responsibility for adaptation work and prevalent views of adaptation as minor operational works rather than a transformative measure in terms of quality of life, are named as some of the factors which have led to the process of acquiring accessibility adaptations being unduly complicated.

When adaptations are facilitated, the reported effect on the lived experience of disabled people who benefit from them is highly positive. [Research](#) from the Centre for Ageing Better has highlighted the impact of even the most minor home adaptations, with outcomes providing not just functional assistance for participants’ lives but also facilitating meaningful emotional and social gain.

One option posited as a solution to make adaptations more accessible is bringing in industry to develop a training offering. This is referred to as a ‘whole home’ approach, incorporating both adaptation and retrofit skills. Such an approach would have the benefit of not only positively impacting access to home adaptations, but also going some way to ensuring we have the skills needed to tackle the decarbonisation of our homes.

In a broader and more structural sense, there is also rethinking needed in terms of how we frame adaptations and accessibility, and how they are considered and understood in the policy and decision-making space at both national and local level. [Research](#) undertaken as part of the Intersectional Stigma of Place-based Ageing project, with support from Housing LIN, argues for an ‘Inclusive Living’ approach to adaptation and calls for the reframing of adaptation as a ‘public issue’. This looks at thinking of accessibility and adaptations in terms of public interventions rather than solutions focused on a particular individual, emphasising the wider social and economic good that increased accessible housing stock will lead to.

What can the Government do to support disabled tenants in the private rented sector?

Disabled tenants in the private rented sector have relatively few rights when it comes to ensuring that their homes meet their needs. While disabled people have the right to portable support aids or temporary adaptations, the law currently does not mandate landlords allowing the removal or alteration of a physical feature or changing shared areas to accommodate disability.

[Research](#) by the Equalities and Human Rights Commission shows 93% of UK rentals are inaccessible to disabled tenants. Poor quality housing and unsuitable housing has a significant impact on the mental wellbeing of residents. As this research outlines, inaccessible housing can also raise the risk of disabled tenants having less access to independent living, raising reliance on family and carers and increasing the risk of avoidable accidents and hospital admissions.

By focusing on prevention and ensuring that everyone has access to a home that fully meets their needs, we will not only futureproof our housing stock, but also provide immediate benefits to tenants and residents who are currently feeling the effects of living in unsuitable accommodation. This will be a significant challenge, but one that Government must take active steps in the short and long term to address.

In the shorter term, the Government must utilise the expertise of the housing and disability sectors, including consultation with people with lived experience of disability, to examine ways in which to strengthen the rights of disabled tenants in the private rented sector.

In the longer term, reviving public sector-led house building is key to delivering the homes we need in the areas they are needed most, including an emphasis on varied type and tenure. While we have welcomed the Government's decision to apply the Decent Homes Standard to the private rented sector, for too long, too many tenants have had no option but to remain in homes that do not meet their needs.

To address this issue in a holistic way which includes accessibility and quality of life, we must not only build new homes, but consider elements such as quality and location. This means working to design homes and places to the highest standards – including embedding new homes in the wider community, with public transport and amenities nearby; and promoting meaningful inclusion and accessibility. In terms of benefits, this would have a positive impact in terms of social isolation while promoting mixed and thriving communities.