



# Adaptable M4(2) Homes

## Public Health Advisory Note

*Director of Public Health and Wellbeing, Dr Sakthi Karunanithi MBBS MD MPH FFPH*



<b>Introduction .....</b>	<b>3</b>
Wider Determinants of Health.....	3
Housing and Health .....	3
<b>Housing Policy .....</b>	<b>5</b>
A Decent Home .....	5
Accessible and Adaptable Housing .....	6
<b>Population Need .....</b>	<b>9</b>
Aging Population .....	9
People Living with Disability .....	14
Family Friendly Housing .....	16
<b>Cost Benefit .....</b>	<b>17</b>
<b>Further National Policy .....</b>	<b>18</b>
Housing for older and disabled people .....	18
Healthy ageing: consensus statement.....	18
National Disability Strategy.....	18
<b>Adaptable Homes Planning Policies .....</b>	<b>21</b>
London .....	21
Huntingdonshire .....	21
South Lakeland.....	22
Cambridge .....	23
Reading .....	23
Bristol .....	23
<b>Recommendation .....</b>	<b>25</b>
<b>References .....</b>	<b>26</b>



## Introduction

This Public Health Advisory Note covers how local planning authorities can help to ensure accessible, sustainable, and lifelong communities by increasing the minimum adaptability standard of new build houses within Lancashire. It outlines the increasing need for adaptable homes at all levels of society and provides examples of similar policies elsewhere in the country.

## Wider Determinants of Health

The health and wellbeing of individual people and local communities is affected by a wide range of factors. Some factors concern the environment, including the built environment. Spatial planning can be used to address a range of health issues such as air quality, physical inactivity, social isolation, and obesity.

Within the National Planning Policy Framework<sup>1</sup> (NPPF, 2021) guidance is provided on how health should be considered by the planning system. As part of the delivery of the social dimension of sustainable development, planning has a role in supporting and developing strong, vibrant, and healthy communities.

One of the core planning principles that underpin both plan-making and decision-taking is for planning policies and decisions to ensure that developments "create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users" (paragraph 130, point f) NPPF). This is accompanied by footnote 49 which states "Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties."

Lancashire County Council's Director of Public Health, through the Health Equity, Welfare and Partnerships service, is collaborating with Lancashire's local planning authorities (LPAs) to take account of local health issues and considerations, through the provision of local health data and advice.

## Housing and Health

Where we live plays an enormous part in our health and wellbeing. Living in a home where we feel comfortable and is safe and secure allows us to prosper. Housing has such a big role in our wellbeing that in 2018 the World Health Organisation (WHO) produced a report<sup>2</sup> dedicated to the topic. They stated "Improved housing conditions can save lives, prevent disease, increase quality of life, reduce poverty, and help mitigate climate change. Housing is becoming increasingly important to health in light of urban growth, ageing populations and climate change."

Using the WHO report, the Centre for Aging Better summarised the impacts of housing on health which can be seen below in Figure 1. The Centre for Aging Better also states "Despite this evidence, an estimated 10 million people in England are at risk because they live in a poor-quality home. This is the equivalent of 4.3 million homes, close to

<sup>1</sup> National Planning Policy Framework – <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>2</sup> WHO Housing and health guidelines – <https://www.who.int/publications/i/item/9789241550376>



half of which are homes lived in by someone over 55 years old and a million with at least one child." [1]

**Figure 1: Housing as a key determinant of health [1]**

### **Housing as a key determinant of health**

Housing is a key determinant of health, with the supply, quality and design of homes all impacting on population health and wellbeing. According to the World Health Organisation:

- Structurally deficient housing increases the likelihood that people slip or fall, increasing the risk of injury.
- Poor accessibility to their home puts disabled and elderly people at risk of injury, stress and isolation.
- Housing that is insecure, sometimes due to affordability issues or weak security of tenure, is stressful.
- Housing that is difficult or expensive to heat contributes to poor respiratory and cardiovascular outcomes.
- High indoor temperatures can cause heat related illnesses and increase cardiovascular mortality.
- Indoor air pollution is connected to a wide range of non-communicable diseases, harms respiratory and cardiovascular health, and may trigger allergic and irritant reactions, such as asthma.
- Crowded housing increases the risk of exposure to infectious disease.
- Inadequate water supply and sanitation facilities affect food safety and personal hygiene, and therefore lead to the development of communicable diseases.

(World Health Organization, 2018)

Mainstream Accessible housing is "housing that is not age-specific but with design criteria that ensure accessibility and inclusivity to promote better living among all ages" [2]. This is a concept that is popular amongst the vast majority of the population with 72% of people agreeing that "homes should, as standard, be built to be suitable for people of all ages and abilities" [3] and 81% of people saying they would buy homes with accessible features such "level access entrances, walk-in showers or handrails" [3].

# Housing Policy

## A Decent Home

The government outlines what classifies a 'decent' home in A decent home: definition and guidance<sup>3</sup>. The document outlines four criteria for a decent home and in what circumstances a property fails to meet these criteria. It uses the Housing Health and Safety Rating System (HHSRS)<sup>4</sup> to assess the hazards which could cause harm to health. A home can be categorised as non-decent for more than one measure. The criteria and domains of the HHSRS can be seen below in Figure 2.

**Figure 2: Criteria for a decent home and HHSRS domains adapted from A decent home: definition and guidance [4] and HHSRS Operating guidance [5].**

Criterion:	It meets the current statutory minimum standard for housing	It is in a reasonable state of repair	It has reasonably modern facilities and services	It provides a reasonable degree of thermal comfort
Dwellings which fail to meet this criterion are those...	<p>...containing one or more hazards assessed as serious ('Category/Class 1') under the Housing Health and Safety Rating System (HHSRS)</p> <p>There are 29 hazards in the HHSRS split into four domains:</p> <p>A. Physiological requirements – Hygrothermal conditions (i.e. damp and extremes of temperatures), and Pollutants (non-microbial, e.g. Asbestos)</p> <p>B. Psychological requirements – Space, Security, Light, and Noise</p> <p>C. Protection against infection – Hygiene, Sanitation, and Water supply</p> <p>D. Protection against accidents – Falls, Electric shock, Burns and Scalds, and Building related Collisions</p> <p>Category 1 hazards are those with the most extreme outcomes including death, lung cancer, and paralysis</p>	<p>...where either:</p> <ul style="list-style-type: none"> <li>• One or more of the key building components are old and because of their condition, need replacing or a major repair; or</li> <li>• Two or more of the other building components are old and because of their condition, need replacing or major repair</li> </ul> <p>Key building components are those which, if in poor condition, could have an immediate impact on the integrity of the building and cause further deterioration in other components. E.g. walls, roofs, windows/doors, heating, plumbing, and electrics</p>	<p>...which lack three or more of the following:</p> <ul style="list-style-type: none"> <li>• A reasonably modern kitchen (20 years old or less)</li> <li>• A kitchen with adequate space and layout</li> <li>• A reasonably modern bathroom (30 years or less)</li> <li>• An appropriately located bathroom and WC</li> <li>• Adequate insulation against external noise (where external noise is a problem)</li> <li>• Adequate size and layout of common areas for blocks of flats</li> </ul>	<p>...which lack both effective insulation and efficient heating.</p>

26% of homes where residents are aged 55-64 are classified as non-decent, this is higher than any other age band [1]. Across all ages, the presence of a Category 1 hazard is the most common reason for being classed as non-decent [1]. In homes with residents aged over 55, around 85% of the Category 1 hazards were as a result of Risk of Falls and Excess Cold [1]. Building to an adaptable standard can greatly reduce the risk of falls in the home.

<sup>3</sup> A decent home: definition and guidance – <https://www.gov.uk/government/publications/a-decent-home-definition-and-guidance>

<sup>4</sup> Housing health and safety rating system (HHSRS) guidance - <https://www.gov.uk/government/collections/housing-health-and-safety-rating-system-hhsrs-guidance>



## Accessible and Adaptable Housing

Approved Document M Volume 1 – Access to and use of buildings<sup>5</sup>, outlines the standards to which new dwellings should be built in order to comply with The Building Regulations 2010. This document identifies three categories of dwelling [6]:

- M4(1) Category 1: Visitable Dwellings – Mandatory
- M4(2) Category 2: Accessible and Adaptable Dwellings – Optional
- M4(3) Category 3: Wheelchair User Dwellings – Optional

In order for reasonable provision to be met for the relevant type of occupant, each type of dwelling has a series of requirements that need to be implemented within the property. These requirements can be seen below in Figure 3. All new dwellings must meet the requirements for M4(1) and, for every requirement, there are two subsequent levels with increasing accessibility for M4(2) and M4(3) [6]. The document then goes on to outline a series of standards that, if implemented successfully, would achieve reasonable provision for each level.

These standards came into effect in 2015 and replaced the existing ones; The M4(2) standard replaced The Lifetime Home Standard and the M4(3) standard replaced the Wheelchair Housing Standards [7].

The Local Authority Building Control (LABC) has outlined the key differences between M4(1) and M4(2) on their website [8]. These are stated below:

"To help you plan and budget, here's a simple roundup of the main differences between M4(1) (the basic standard) and M4(2) (the intermediate standard):

### External differences

- All external doors must have a level threshold - the lower standard is just one door
- Approach routes must have a minimum clear width of 900mm or 750mm where there are obstructions, the gradient should be between 1:20 and 1:12
- Every gateway must have an 850mm clear opening, with a 300mm nib on the leading edge to allow users to reach the handle
- Parking spaces within the private curtilage of the dwelling (but not a car port or garage) must include at least one standard parking bay that can be widened at a later date to 3.3m
- Every principal entrance must have a canopy covering a minimum width of 900mm and depth of 1200mm. This can't be a porch
- External doors must have an openable width of 850mm and have a 300mm nib on the leading edge (see diagram 2.2 ADM)

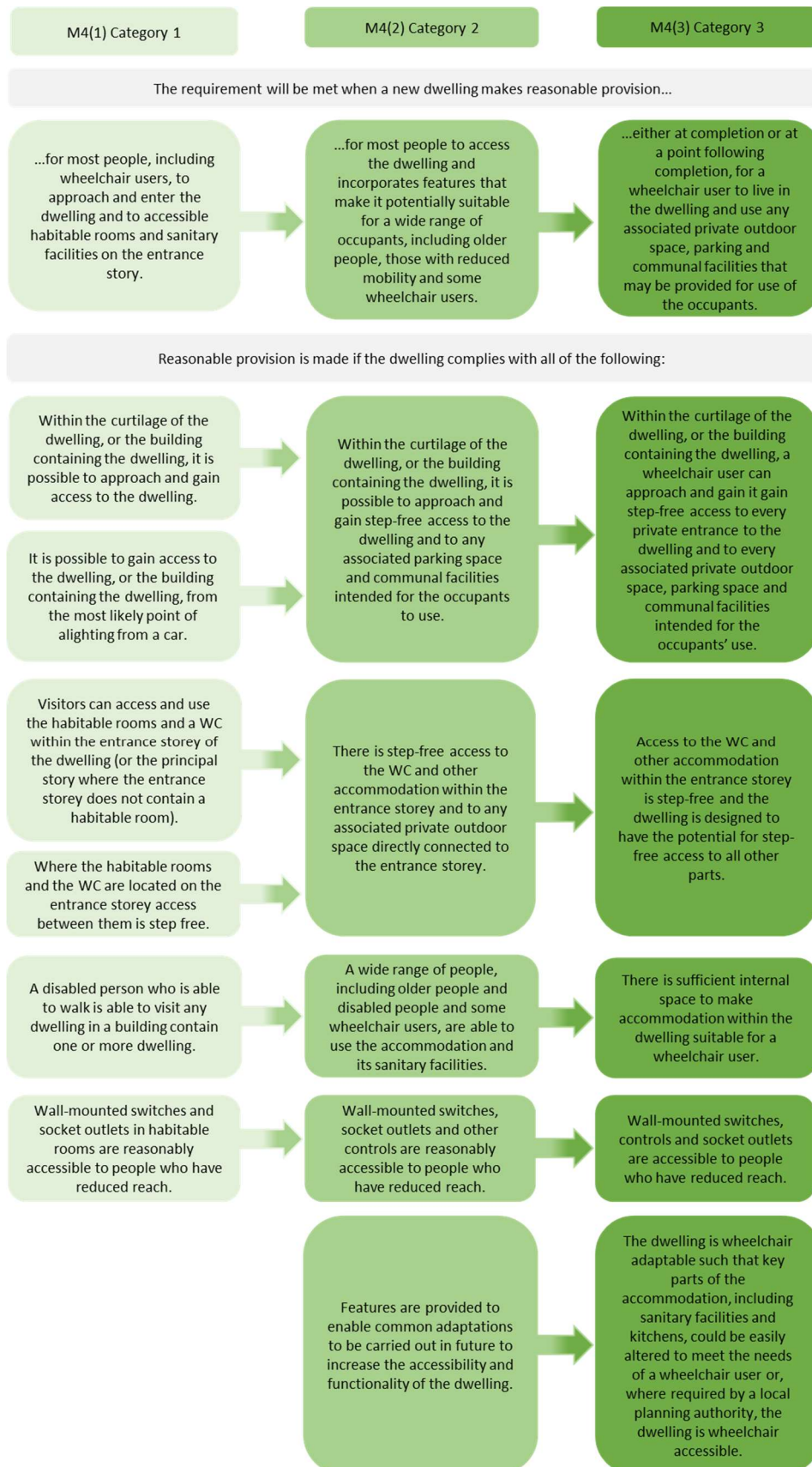
### Internal differences

- Stairs must be a minimum width of 850mm to allow the future installation of a stair lift

<sup>5</sup> Approved Document M Volume 1 – Access to and use of buildings – <https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m>



**Figure 3: Dwelling requirements for different categories, details adapted from Approved Document M [6]**



- At least one bedroom must have a 750mm clear access zone from the foot of the bed and on both sides. Every other double bedroom will need a clear access zone on one side and the foot of the bed. Plans of furniture layouts in this case will need to be provided to show compliance
- Walls, ducts and boxings on all WC, bathroom and wet rooms must be strong enough to support grab rails, shower seats and other adaptations, which can take a load of 1.5kn/m<sup>3</sup>.
- A bathroom must be located on every floor that has a bedroom
- Ground floor WC must have a hidden drainage connection and be large enough to accommodate a shower
- Consumer units must be mounted at a height between 1350mm and 1450mm above floor level
- Handles for windows, unless on a remote opening system, must be located between 450mm and 1400mm above floor level"





## Population Need

The Habinteg Housing and Disabled People Toolkit states: "To ensure that the Local Plan meets statutory requirements, local authorities will need to have gathered sufficient information on the current and projected demand for accessible and adaptable housing, and reflected this in their proposals." [9] As such, the following section outlines the need for adaptable housing in Lancashire by identifying those that would benefit from these houses.

### Aging Population

When planning for housing for older people, many assume that this is specialist housing or care homes but, in reality, 95% of people over 65 live in mainstream housing, with only a quarter of over 55s saying they are currently considering moving home [2]. Despite this, just 7% of our current homes meet the lowest level of accessibility [10] and only one new accessible home is planned for every 15 people over 65 by 2030 [3].

There is also a misconception that when older people do move, it will be to downsize to a smaller property, but this often is not the case. Only 39% of older homeowners who moved to a new build home between 2010 and 2016 downsized; a third kept the same number of bedrooms and 28% upsized to a home with additional bedrooms [10].

When asked what their strongest motivations were for moving home seven in ten adults wanted to live in housing better designed to meet their needs, prioritising at least one of the following requirements "ground floor living, enabling independent living or being adaptable to changing needs" [2]. However due to limited housing, 60% of older people are unable to move from their current home even if it becomes unsuitable [10].

The Manchester School of Architecture proposes the idea of Rightsizing – "it is an older person's active, positive choice to move home as a means of improving their quality of life" [10]. They identify two types of older movers, those that are availability driven and those that are accessibility driven (including poor home design). The differences between the two can be seen below in Figure 4.

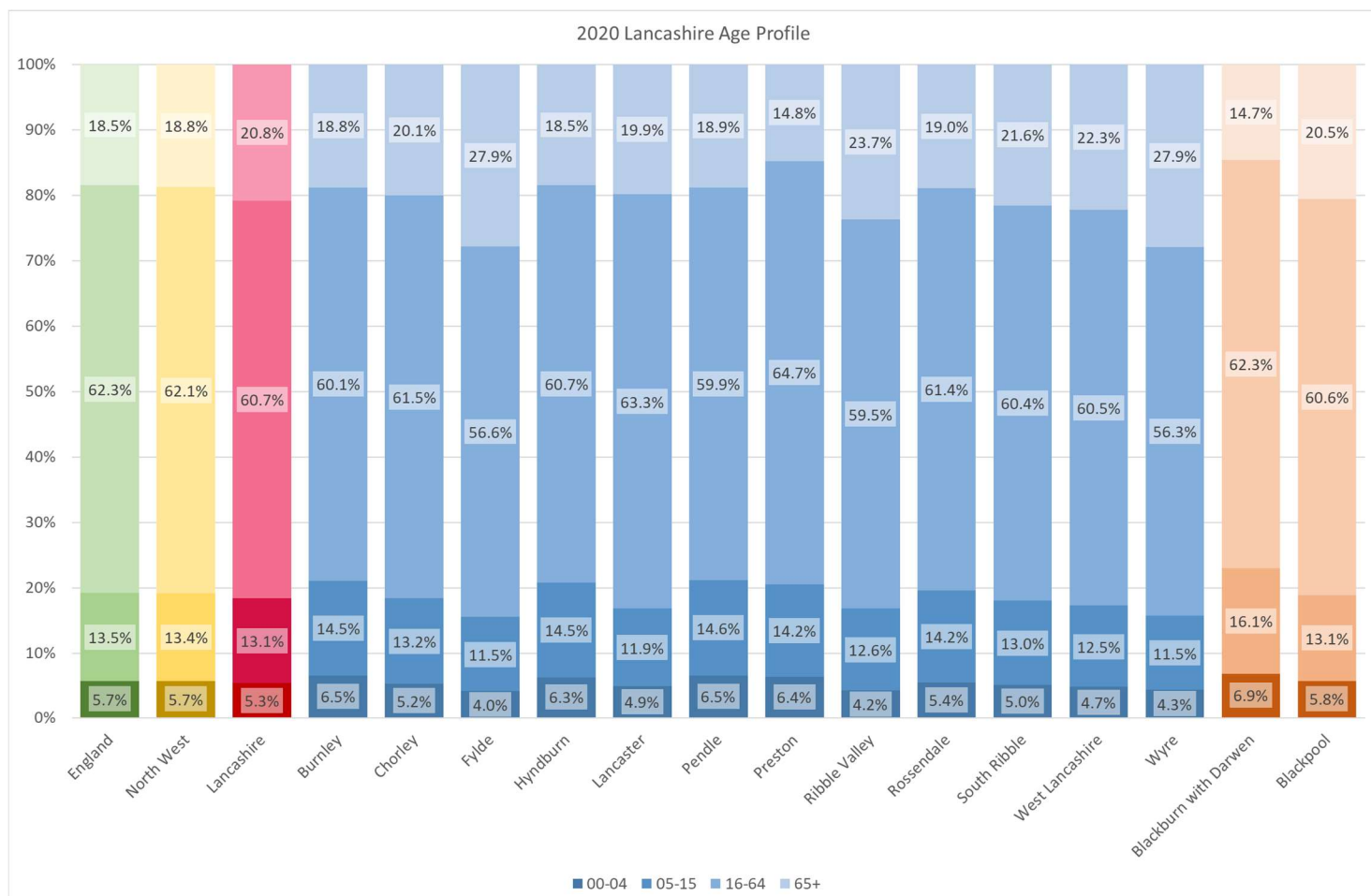
**Figure 4: Two types of older movers [10]**

Availability driven	Accessibility driven
<ul style="list-style-type: none"> <li>▶ Based mostly on aspiration, dependent on the (limited) availability of options that allow them to meet these aspirations.</li> </ul>	<ul style="list-style-type: none"> <li>▶ Based mostly on problems, dependent of the (limited) accessibility of options that allow them to solve these issues.</li> </ul>
Reasons for moving	Reasons for moving
<ul style="list-style-type: none"> <li>▶ Moving in with partner/new spouse.</li> <li>▶ Move to be closer to family or friends.</li> <li>▶ Move for work or to reduce commuting time.</li> <li>▶ Move after retirement (ie. when proximity to work is no longer needed).</li> <li>▶ Wanting better home quality/larger home.</li> <li>▶ Wanting a specific type of accommodation.</li> <li>▶ Wanting to become a homeowner.</li> <li>▶ Wanting more privacy.</li> <li>▶ Wanting to move to a specific place/ a rural community.</li> <li>▶ Wanting a change.</li> </ul>	<ul style="list-style-type: none"> <li>▶ Moving away from spouse/divorce.</li> <li>▶ Eviction from rental accommodation.</li> <li>▶ Poor housing conditions (eg damp).</li> <li>▶ Problems with home design (eg. unable to climb stairs).</li> <li>▶ To go to accommodation with health support.</li> <li>▶ Dislike current house.</li> <li>▶ Feeling socially isolated.</li> <li>▶ Moving away from bad neighbours, noise or crime.</li> </ul>



In Lancashire, roughly a fifth (20.8%) of the population is 65 or over, this works out at an estimated 255,637 people. The full 2020 age profile of Lancashire and the districts can be seen below in Figure 5 a) and Figure 5 b) shows the proportion of 2020 population that is aged 65 or over.

**Figure 5: a) Lancashire 2020 ONS population, broken down by age bands**



Source: ONS Mid-year Estimates, Lancashire JSNA<sup>6</sup>

As can be seen from these graphs, whilst the 60.7% of the population is of working age, 16-64, Lancashire (20.8%) has a 65+ population that is significantly higher than both the England (18.5%) and North West (18.8%) proportions.

There is a quite a lot of variation amongst the districts:

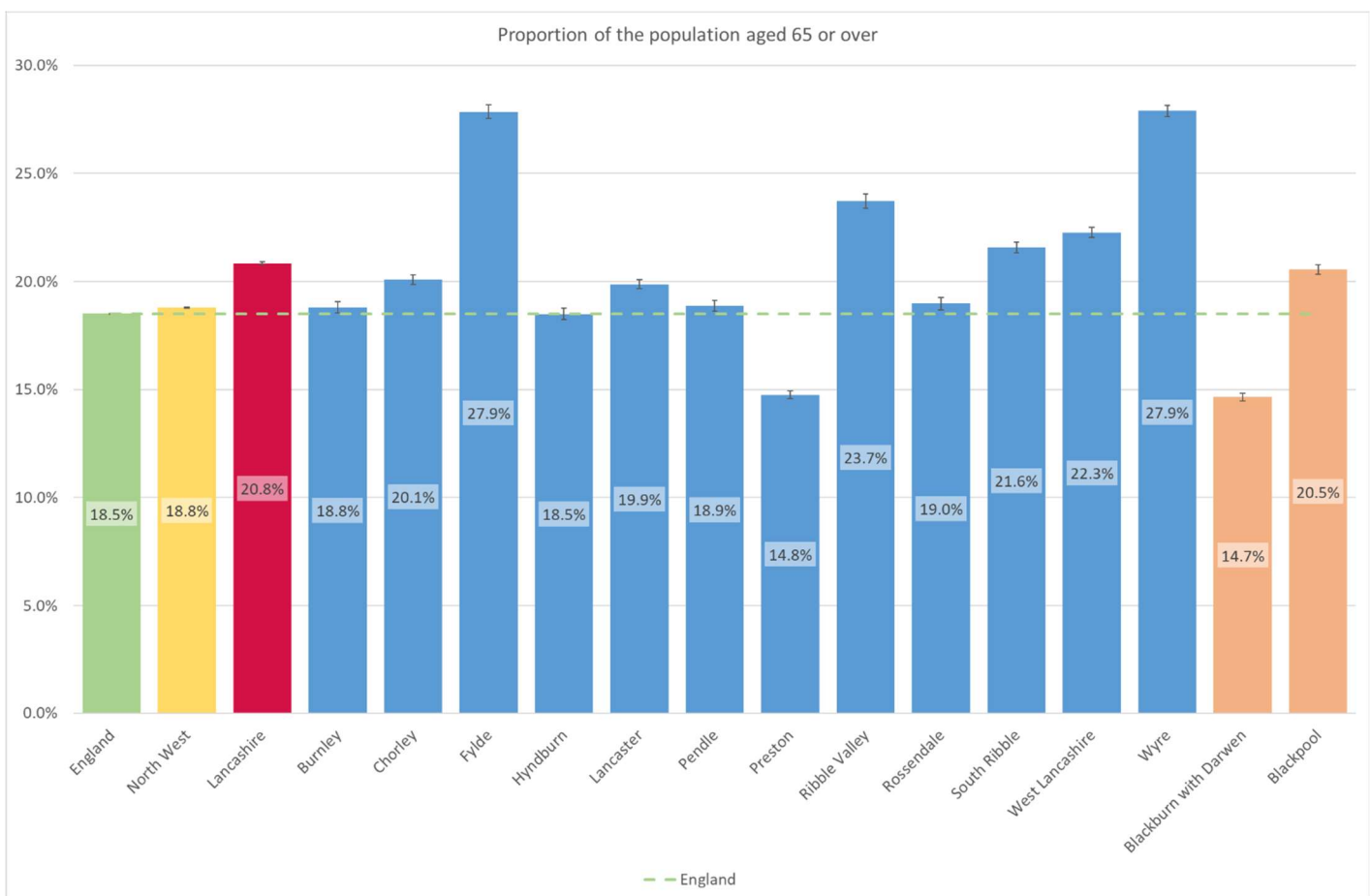
- Fylde and Wyre have the highest proportion of 65 or over both at 27.9% each.
- Preston has the lowest rate of over 65's at 14.8%
- With the exception of Hyndburn (18.5%) and Preston (14.8%), all of the districts have proportions of over 65s that are significantly higher than England

<sup>6</sup> ONS Mid-Year Estimates, Lancashire JSNA - <https://www.lancashire.gov.uk/lancashire-insight/population-and-households/population/mid-year-population-estimates/>



- Chorley (20.1%), Fylde (27.9%), Lancaster (19.9%), Ribble Valley (23.7%), South Ribble (21.6%), West Lancashire (22.3%) and Wyre (27.9%) are all significantly higher than the North West
- Hyndburn (18.5%) and Preston (14.8%) are significantly lower than the North West
- Fylde (27.9%), Ribble Valley (23.7%), South Ribble (21.6%), West Lancashire (22.3%) and Wyre (27.9%) are significantly higher than Lancashire
- Burnley (18.8%), Chorley (20.1%), Hyndburn (18.5%), Lancaster (19.9%), Pendle (18.9%), Preston (14.8%), and Rossendale (19.0%) are significantly lower than Lancashire

**Figure 5: b) Proportion of the 2020 ONS population that is aged 65 or over**



Source: ONS Mid-year Estimates, Lancashire JSNA<sup>7</sup>

As mentioned above, falls are one of the biggest risks of unsuitable housing to older people. In Lancashire, in 2019/20, there was a directly standardised rate of 1963.41 per 100,000 people for emergency hospital admissions due to falls in people aged 65 and over. Whilst this lower than the England (2221.76) and North West (2437.38) rates, it translates to 4920 people in a single year [11]. This fact is more concerning when you consider that in the 2011 Census 13.3% of all houses contained only a single adult over the age of 65 and 61.7% of these had a long-term condition [12].

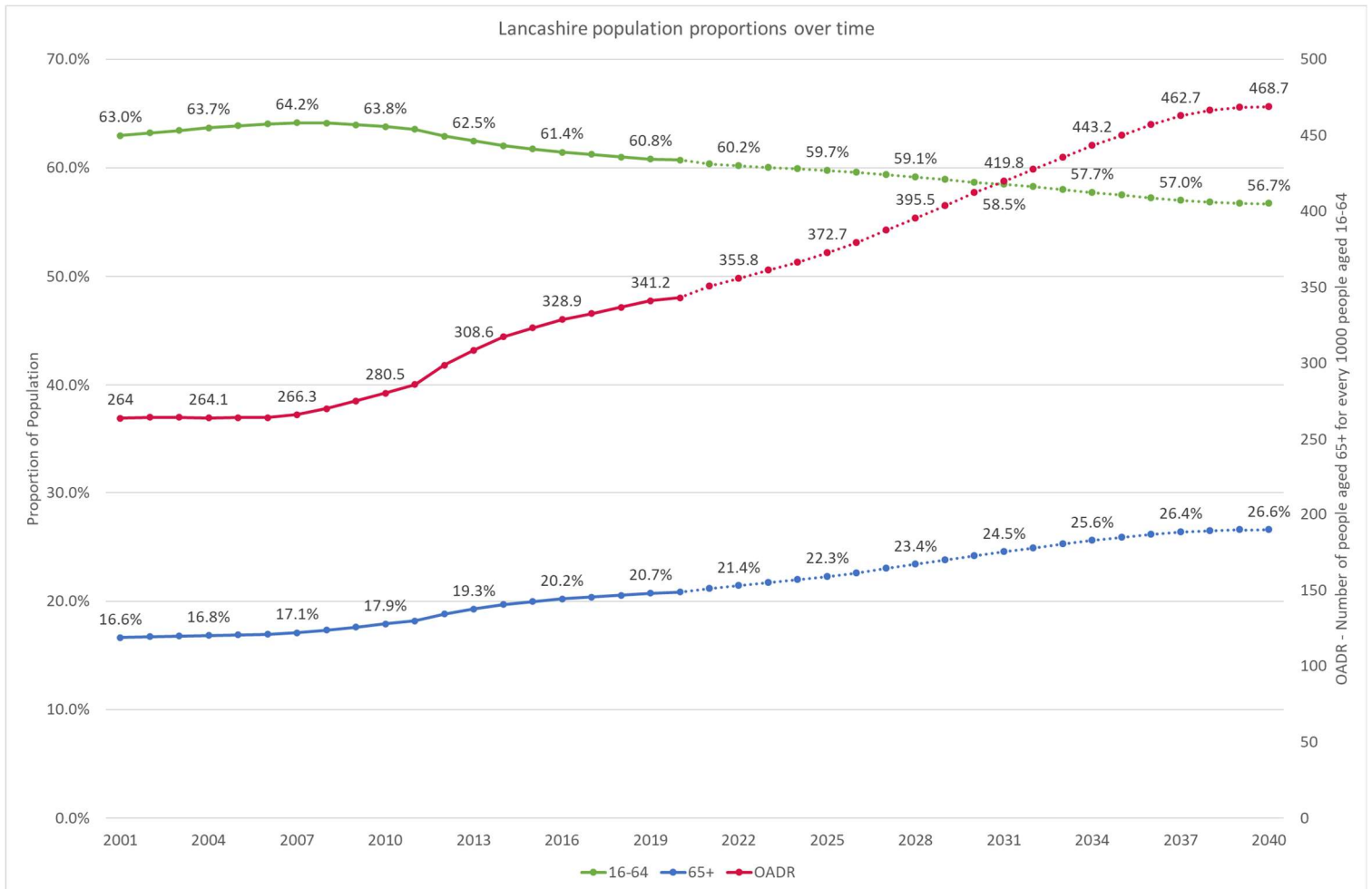
<sup>7</sup> ONS Mid-Year Estimates, Lancashire JSNA - <https://www.lancashire.gov.uk/lancashire-insight/population-and-households/population/mid-year-population-estimates/>



Furthermore, the number of older people in our population is increasing. In 2001 there were 188,986 people in Lancashire that were aged 65 or over; this made up 16.6% of the population. In 2020 this had increased to 255,637 people aged 65 or over making up 20.8% of the population. ONS population projections predict this trend will continue and by 2040 the 65 and over age bracket will make up 26.6% of the total Lancashire population. This in turn goes with a decrease in the number of working age people (16-64) as shown below in Figure 6.

Also shown in Figure 6 is the increase in The Old Age Dependency Ratio (OADR). This is a measure that considers the impact of an ageing population. It works out the number of people aged 65 and over per 1000 people aged 16-64. Table 1 shows the 2020 district figures for this ratio showing that Lancashire has a higher OADR ratio at 343.1 compared to England (297.0) and the North West (302.7).

**Figure 6: Time Series showing Lancashire population proportions alongside the OADR between 2001 and 2040**



Source: ONS Mid-year Estimates, Lancashire JSNA<sup>8</sup> and ONS Population Projections<sup>9</sup>

<sup>8</sup> ONS Mid-Year Estimates, Lancashire JSNA - <https://www.lancashire.gov.uk/lancashire-insight/population-and-households/population/mid-year-population-estimates/>

<sup>9</sup> ONS Population Projections - <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandz1>



**Table 1: 2020 Old Age Dependency Ratio**

Area	Number of people aged 16-64	Number of people aged 65 or over	OADR
England	35233879	10464019	297.0
North West	4572870	1384396	302.7
Lancashire	745117	255637	343.1
Burnley	53701	16798	312.8
Chorley	73154	23863	326.2
Fylde	45942	22622	492.4
Hyndburn	49277	15004	304.5
Lancaster	93779	29435	313.9
Pendle	55225	17392	314.9
Preston	93266	21270	228.1
Ribble Valley	36895	14712	398.8
Rosendale	43883	13549	308.8
South Ribble	67063	23965	357.4
West Lancashire	69234	25496	368.3
Wyre	63698	31531	495.0
Blackburn with Darwen	93526	21986	235.1
Blackpool	83865	28433	339.0

Source: ONS Mid-year Estimates, Lancashire JSNA<sup>10</sup>

This data indicates that in Lancashire older people already make up a significant part of the population and this is likely to increase. The population in Lancashire is aging and as it does so, the need for adaptable homes increases. By building all homes to the M4(2) standard as a baseline we allow individuals to 'age in place', with their home adapting to meet their additional needs as they arise. If all properties are built to this standard, individuals will not be limited to the type of property they can purchase, and houses will meet both their needs and their desires.

<sup>10</sup> ONS Mid-Year Estimates, Lancashire JSNA - <https://www.lancashire.gov.uk/lancashire-insight/population-and-households/population/mid-year-population-estimates/>

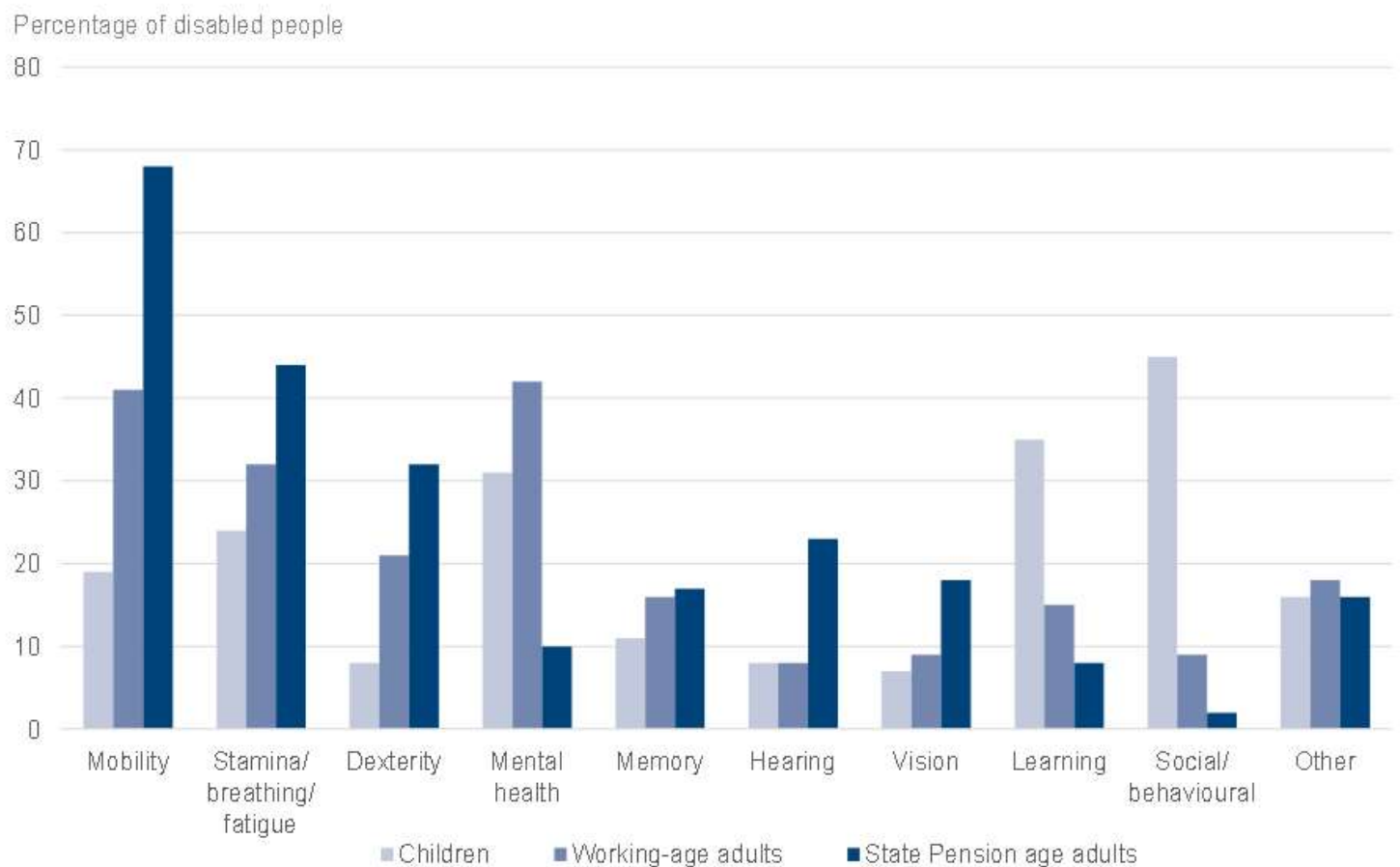


## People Living with Disability

The 2019/20 Family Resources Survey estimated that 22% of people in the UK have a disability; 56% of these are working aged adults [13]. Across all age groups the most common type of disability is a mobility impairment which makes up 49% of all disabilities. There is variation across the age groups with older people more likely to have physical impairments, working age equally likely have physical or mental health impairments, and children more likely to have behavioural or learning impairments [13]. The breakdown by age groups can be seen in Figure 7.

**Figure 7: Impairment type by age band, from the Family Resources Survey [13]**

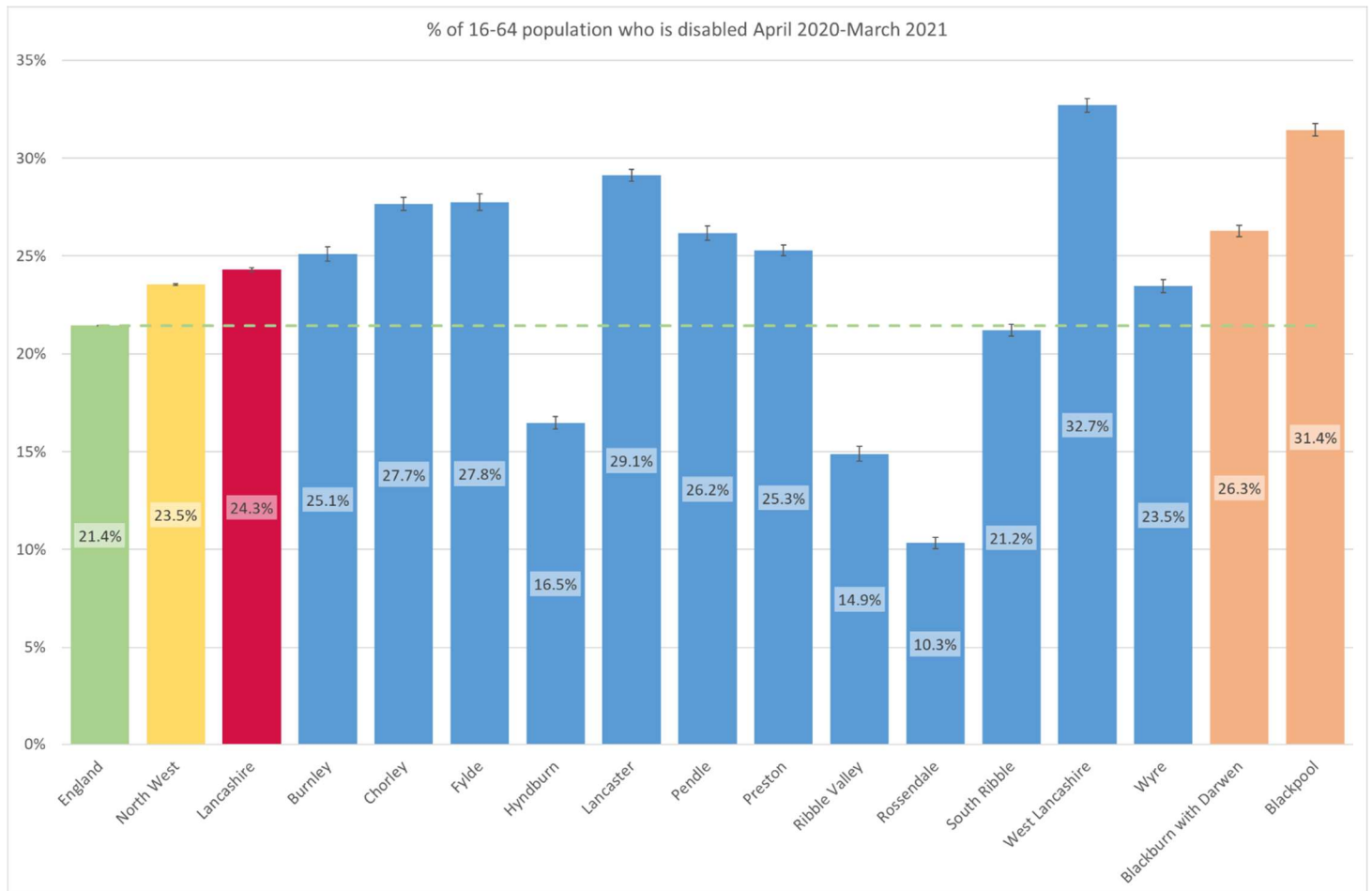
**Impairment types reported by disabled people, by age group, 2019/20, United Kingdom**



The Annual Population Survey states that between April 2020 and March 2021, in Lancashire, 24.3% of the working age population had some form a disability or condition that limited the work they could do [14]. This is significantly higher than both the England (21.4%) and the North West (23.5%) rates [14]. The district breakdown can be seen below in Figure 8.



**Figure 8: Proportion of working age population that has a disability, April 2020- March 2021**



Source: Annual Population Survey<sup>11</sup>

Research carried out by Habinteg and Papworth Trust in 2015 found that "people with unmet need for accessible housing are four times more likely to be unemployed or not seeking work because they are sick or disabled than those whose needs are met or who are disabled but do not need accessible housing." [15].

Their research suggests that the reason for this is people in unsuitable housing have to spend considerably more time and energy on everyday living tasks than those in suitable housing, leaving them unable to hold down a job [15]. These individuals are also more likely to experience "increasing dependence on others and are at higher risk of social isolation" [15].

As can be seen in Table 2, in Lancashire, 54.3% of disabled working age people are in employment compared to 82.2% of non-disabled working age people; this is a difference in percentage of 27.9% [14]. This is greater difference than the England figure of 25.5%

<sup>11</sup> Annual Population Survey – Nomis - <https://www.nomisweb.co.uk/datasets/apsnew>



**Table 2: Difference in employment rates between disabled and non-disabled working age people, April 2020-March 2021**

Area	Employment rate aged 16-64 - disabled			Employment rate aged 16-64 - not disabled			Difference in percentage between non-disabled employment rate and disabled employment rate
	Number employed	Total disabled	Proportion employed	Number employed	Total not disabled	Proportion employed	
England	4,130,100	7,474,500	55.3%	20,788,100	25,755,700	80.7%	25.5%
North West	537,000	1,056,000	50.9%	2,549,300	3,181,100	80.1%	29.3%
Lancashire	95,000	175,100	54.3%	446,900	543,700	82.2%	27.9%
Burnley	8,200	13,300	61.7%	30,900	39,700	77.8%	16.2%
Chorley	7,500	19,000	39.5%	41,200	49,700	82.9%	43.4%
Fylde	8,000	12,100	66.1%	25,600	31,600	81.0%	14.9%
Hyndburn	5,500	8,400	65.5%	32,900	42,600	77.2%	11.8%
Lancaster	16,000	25,000	64.0%	51,000	60,600	84.2%	20.2%
Pendle	7,200	14,600	49.3%	35,000	41,200	85.0%	35.6%
Preston	9,200	22,500	40.9%	50,400	66,600	75.7%	34.8%
Ribble Valley	3,700	5,300	69.8%	24,200	30,300	79.9%	10.1%
Rossendale	2,400	4,400	54.5%	32,400	37,000	87.6%	33.0%
South Ribble	8,600	14,100	61.0%	44,100	52,200	84.5%	23.5%
West Lancashire	11,700	22,500	52.0%	37,400	46,300	80.8%	28.8%
Wyre	7,100	14,100	50.4%	42,000	46,000	91.3%	40.9%
Blackburn with Darwen	9,900	23,700	41.8%	39,000	54,300	71.8%	30.1%
Blackpool	12,500	25,500	49.0%	35,100	43,000	81.6%	32.6%

Source: Annual Population Survey<sup>12</sup>

The 2019/20 English Housing Survey reports that nationally there are 1.9 million households that have a need for accessible housing; just shy of 760,000 are households with working age residents [16]. Within Lancashire, in 2011 Census 36% of all households contained at least one person with a long-term disability or illness [12]. Addressing the housing needs of these individuals, by building to M4(2) standard, would have considerable benefit both on their personal wellbeing and also on the local economy by adding labour to the workforce.

### Family Friendly Housing

In 2020, 5.3% of the population in Lancashire were children under 5; this works out at roughly 65,000 children. The Census 2011 found 28.2% of all households had a dependent child living at the property [12].

Adaptable homes would not only benefit older people and those with disabilities, the larger surface area, wider doorframes, and step free access of homes built to M4(2) standard will help families, especially those with young children (i.e. in a pushchair).

<sup>12</sup> Annual Population Survey – Nomis - <https://www.nomisweb.co.uk/datasets/apsnew>





## Cost Benefit

The Ministry of Housing, Communities & Local Government produced a consultation paper in September 2020 entitled "Raising accessibility standards for new homes". Within this paper, they estimated the additional cost to build to M4(2) standard rather than M4(1), including the extra space required, was roughly £1,400 per dwelling [17]. A full breakdown of costs can be seen in Figure 9 below, taken from the Local Authority Toolkit from Habinteg.

**Figure 9: The additional cost for meeting Category 2 and 3 standards compared to the standard of Category 1 [9]**

	Access (build) cost		Access-related space cost (after space cost recovery)	Total cost
<b>Category 2</b>				
1 bed apartment	£940	+1sq.m	£289	£1,229
2 bed apartment	£907	+1sq.m	£289	£1,196
2 bed terraced	£523	+2sq.m	£578	£1,101
3 bed semi-detached	£521	+3sq.m	£866	£1,387
4 bed detached	£520	+3sq.m	£866	£1,386
<b>Category 3 Adaptable</b>				
1 bed apartment	£7,607	+8sq.m	£2,310	£9,908
2 bed apartment	£7,891	+14sq.m	£4,043	£11,934
2 bed terraced	£9,754	+21sq.m	£6,065	£15,819
3 bed semi-detached	£10,307	+24sq.m	£6,931	£17,244
4 bed detached	£10,568	+24sq.m	£6,931	£17,499
<b>Category 3 Accessible</b>				
1 bed apartment	£7,767	+8sq.m	£2,310	£10,077
2 bed apartment	£8,048	+14sq.m	£4,043	£12,091
2 bed terraced	£22,238	+21sq.m	£6,065	£28,303
3 bed semi-detached	£22,791	+24sq.m	£6,931	£29,722
4 bed detached	£23,052	+24sq.m	£6,931	£29,983

The costs of adapting an existing home far outweighs building to the adaptable standard as a baseline. It is estimated it would cost £7,000 in Disabled Facilities Grant to adapt a Category 1 home to a Category 2 level [3]. Additionally, if your house becomes unsuitable for your needs to the point where you need to move, it would cost £29,000 per year in residential care costs [3].

Furthermore, unsuitable and poor housing has wider costs to the society. It is estimated that the cost of poor housing to the NHS across all ages is £1.4 billion per annum in the first year of treatment alone [1]. In the over 55 age bracket it estimated that poor housing costs the NHS £513 million in avoidable treatment, with £177 million of this being as a result of falls [1]. There is also the impact on: employment, due to lost working days and leaving the workforce early because of poor health; social care, due to increase demands from avoidable incidents; and welfare benefits, due to higher unemployment and disability payments [1].



## Further National Policy

### Housing for older and disabled people

Outlined on the Government's website is guidance from 2019 entitled Housing for older and disabled people<sup>13</sup>. The guidance states:

"Accessible and adaptable housing enables people to live more independently, while also saving on health and social costs in the future. It is better to build accessible housing from the outset rather than have to make adaptations at a later stage – both in terms of cost and with regard to people being able to remain safe and independent in their homes.

Accessible and adaptable housing will provide safe and convenient approach routes into and out of the home and outside areas, suitable circulation space and suitable bathroom and kitchens within the home. Wheelchair user dwellings include additional features to meet the needs of occupants who use wheelchairs, or allow for adaptations to meet such needs." [18]

### Healthy ageing: consensus statement

Public Health England and the Centre for Aging Better have set out a "shared vision for making England the best place in the world to grow old" in the Healthy ageing: Consensus Statement<sup>14</sup>. Within this statement they make five principles across a range of areas that all have an impact on health. One these area's is Ensuring good homes and communities and they make the commitment to:

"Ensuring good homes and communities to help people remain healthy, active and independent in later life. Poor housing can contribute to and exacerbate many long-term health conditions. We want to improve the quality of our existing mainstream housing stock and future-proof new homes, ensuring they are built to be accessible and adaptable" [19].

### National Disability Strategy

Following a public consultation, the Government outlined the National Disability Strategy<sup>15</sup> in July 2021. This strategy considers the difficulties faced by disabled people in the UK and makes a commitment to improve conditions in all aspects of their lives. The strategy is split into three parts: Part 1, Practical steps now to improve disabled people's everyday lives; Part 2, Disabled people's everyday experience at the heart of government policy making and service delivery; and Part 3, A cross-government effort to transform disabled people's everyday lives. Within each part there are relevant sections relating to accessible housing [20].

Part 1 – Practical steps now to improve disabled people's everyday lives.

Housing is identified as one of eight key areas where work can be carried out to improve the lives of disabled people, with the strategy stating, "A decent home is the

<sup>13</sup> Housing for older and disabled people - <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

<sup>14</sup> Healthy ageing: Consensus Statement – <https://www.gov.uk/government/publications/healthy-ageing-consensus-statement>

<sup>15</sup> National Disability Strategy – <https://www.gov.uk/government/publications/national-disability-strategy>



foundation for an independent life." [20]. The importance of an accessible home is recognised within this section of the strategy and the government has committed to "boost the supply of housing for disabled people by rising accessibility standards for new homes" [20]. As part of this work a consultation into raising the accessibility standards was carried out in 2020 by the Ministry of Housing, Communities & Local Government. The results should be published in December 2021 [20].

Part 2 – Disabled people's everyday experience at the heart of government policy making and service delivery.

As quoted above, the Government has recognised that good quality housing is crucial to ensuring an independent life. Supporting independent living is one of the five areas that will underpin all commitments around disability made by Government. The list of five areas can be seen below in Figure 10. Also relevant to housing areas 1. Ensuring fairness and equality and 2. Consider disability from the start, as building to M4(2) would allow individuals to access and live in any community they wished and enable people to stay in their homes should disability arise later in life.

**Figure 10: National Disability Strategy, five areas which will guide the Government's work [20]**

We will work across government departments to embed the following elements, which underpin our future approach to disability:

1. **Ensure fairness and equality** – we will empower disabled people by promoting fairness and equality of opportunities, outcomes and experiences, including work and access to products and services.
2. **Consider disability from the start** – we will embed inclusive and accessible approaches and services to avoid creating disabling experiences from the outset.
3. **Support independent living** – we will actively encourage initiatives that support all disabled people to have choice and control in life.
4. **Increase participation** – we will enable greater inclusion of a diverse disabled population in the development and delivery of services, products and policies.
5. **Deliver joined up responses** – we will work across organisational boundaries and improve data and evidence to better understand and respond to complex issues that affect disabled people.

Part 3 – A cross-government effort to transform disabled people's everyday lives. The Government's commitment to "boost housing supply for disabled people" falls under the control of The Ministry of Housing, Communities and Local Government (MHCLG)<sup>16</sup>. The full list of commitments under MHCLG control to improve accessibility across society can be seen below in Figure 11.

<sup>16</sup> The Ministry of Housing, Communities and Local Government changed its name in September 2021 to The Department for Levelling Up, Housing and Communities as part of the post-COVID levelling up agenda- <https://www.gov.uk/government/news/ambitious-plans-to-drive-levelling-up-agenda>

**Figure 11: MHCLG commitments to improving accessibility [20]**

The department will take action across housing and planning to create more accessible homes and communities.

MHCLG commits to:

- boost England’s housing supply for disabled people by setting out plans to increase the accessibility of new homes, options for supported housing and home ownership
- ensure the safety of disabled people in buildings, for when there are emergencies
- consider how we can support projects that will increase high street accessibility for disabled people, through the design of any future local growth funding
- accelerate the roll out of specialist Changing Places toilets across the country
- encourage local authorities to build and refurbish more inclusive playgrounds for disabled children



## Adaptable Homes Planning Policies

Aligned to the National Planning Policy Framework, many local authorities across the UK are beginning to implement policies requiring houses to be built to the adaptable standard. The Habinteg Forecast for Accessible Homes 2020 found that of the 324 local planning areas in England, 48% (154) had a policy within their local plan setting a percentage of new homes to be built to adaptable standard [21]. 119 of these specified the use of the Building regulations M4(2) and M4(3) standards [21].

In the North West, only 9 Local Plans out of the 39 planning areas had policies requiring M4(2)/M4(3). 4 areas had requirements for old Lifetime Homes and Wheelchair Housing Design Standards [21].

Between different local authorities, the minimum number of new homes built to the adaptable standard varies but over the past several years areas have started to commit to all new homes being built to M4(2) as a baseline, with a some further specifying a percentage should be built to M4(3). Whilst not an exhaustive list, presented below are series of case studies which can be used as examples when developing policies within Lancashire.

### London<sup>17</sup>

The Greater London Authority was the first area to implement full coverage of the adaptable home standards [22]. They did this through a Minor Adaptation to their Local Plan<sup>18</sup>. The finalised policy required 90% of homes to be built to M4(2) standard and the remaining 10% be built to M4(3) standard. The policy reads:

"Standard 11: 90 per cent of new build housing should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation requirement M4(3) 'wheelchair user dwellings'."<sup>19</sup>

### Huntingdonshire<sup>20</sup>

Within Huntingdonshire's 2016-2036 Local Plan Policy LP25 outlines their plan for Housing Mix. This includes a section specifically about Accessible and Adaptable homes where they commit to all new homes being built to M4(2) standard unless impractical or unviable. Their policy reads:

"Accessible and adaptable homes

A proposal that includes housing will be supported which meets the optional Building Regulation accessibility standards (or replacement standards) as

<sup>17</sup> Greater London Authority Housing SPD –

[https://www.london.gov.uk/sites/default/files/housing\\_spg\\_revised\\_040516.pdf](https://www.london.gov.uk/sites/default/files/housing_spg_revised_040516.pdf)

<sup>18</sup> Greater London Authority Housing Standards Minor Alterations to The London Plan –

[housing\\_standards\\_malp\\_for\\_publication\\_7\\_april\\_2016.pdf](https://www.london.gov.uk/sites/default/files/housing_standards_malp_for_publication_7_april_2016.pdf) (london.gov.uk)

<sup>19</sup> Please note: in the published standard there is a typo where requirement is spelt requirment – for clarity this has been corrected in the quoted extract.

<sup>20</sup> Huntingdonshire Local Plan – <https://www.huntingdonshire.gov.uk/media/3872/190516-final-adopted-local-plan-to-2036.pdf>



set out below, unless it can be demonstrated that site-specific factors make achieving this impractical or unviable:

f. ensuring 100% of new dwellings, across all tenures provided, meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' (or replacement standards); and

g. within a large scale development proposal the construction standards of a proportion of new market

dwellings should be further enhanced to meet Building Regulation requirement M4(3) 'wheelchair adaptable dwellings' (or replacement standards); and

h. for all affordable housing an appropriate proportion meeting Building Regulation requirement M4(3) 'wheelchair adaptable dwellings' (or replacement standards) should be negotiated with the Council's Housing Strategy team."

## South Lakeland<sup>21</sup>

South Lakeland produced an evidence review into the need for the optional housing standards in 2017. After considering their population demographics (e.g. age and disability) and their existing housing stock they concluded that all new housing should be built to M4(2) standard as a minimum and 5% of dwellings on sites over 40 homes should be built for M4(3). The only exception to these rules is when it is physically infeasible to achieve the requirements of an M4(2) property. Their policy states:

"The evidence presented in this paper clearly demonstrates the need for more accessible and adaptable homes in South Lakeland. The Council is taking the approach that it is logical and justified that all new homes should be flexible and to be built to a standard that is suitable for a range of different people with different characteristics and at different life stages. The proposed policy recognises the situations whereby it may not be feasible or practical to meet these requirements (e.g. due to topography or flood risk) and allows for exceptions where justified. However the Council proposes that the general expectation is that all new homes should meet these standards where possible."

"... it is proposed that a requirement for 5% of Category 3 dwellings on residential sites of 40 units or more would generate a realistic supply of wheelchair adaptable dwellings to meet unmet need. ... Applying this requirement to only larger sites will also help ensure wheelchair user dwellings are provided in the most suitable and sustainable locations as larger housing sites are steered towards these locations through the Local Plan..."

<sup>21</sup> South Lakeland Optional Housing Standards Evidence Paper - <https://www.southlakeland.gov.uk/media/4174/updated-optional-housing-standards-evidence-paper-aug-2017.pdf>

## Cambridge<sup>22</sup>

In October 2018 Cambridge adopted their Local Plan and it will last until 2031. There is a specific policy relating to adaptable homes requiring all new homes be built to M4(2) and a 5% of affordable homes be built to M4(3). The wording for Policy 53: Accessible Homes is below:

"In order to create accessible homes:

- a. all housing development should be of a size, configuration and internal layout to enable Building Regulations requirement M4 (2) 'accessible and adaptable dwellings' to be met; and
- b. 5 per cent of the affordable housing component of every housing development providing or capable of acceptably providing 20 or more self-contained affordable homes<sup>42</sup>, should meet Building Regulations requirement M4 (3) 'wheelchair user dwellings' to be wheelchair accessible, or be easily adapted for residents who are wheelchair users"

## Reading<sup>23</sup>

Reading adopted their Local Plan in November 2019 and it will last until 2036. Policy H5: Standards for New Housing outlines the requirements that new housing should be built to. This includes the requirements for all new homes to be M4(2) unless built to M4(3) standard. The policy reads:

"New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable: ...

...e. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations, unless it is built in line with M4(3) (see below).

f. On developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations. Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'"

## Bristol<sup>24</sup>

Bristol is currently (Nov 2021) reviewing their Local Plan. In March 2019 they published their Draft Policies and Development Allocations. Within this document they have highlighted the need for more adaptable and accessible homes and therefore have proposed Draft Policy H9: Accessible Homes which reads:

<sup>22</sup> Cambridge Local Plan – <https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf>

<sup>23</sup> Reading Local Plan – [https://images.reading.gov.uk/2019/12/Local\\_Plan\\_Adopted\\_November\\_2019.pdf](https://images.reading.gov.uk/2019/12/Local_Plan_Adopted_November_2019.pdf)

<sup>24</sup> Bristol Local Plan Review: Draft Policies and Development Allocation – <https://www.bristol.gov.uk/documents/20182/34536/Local+Plan+Review+-+Draft+Policies+and+Development+Allocations+-+Web.pdf/2077eef6-c9ae-3582-e921-b5d846762645>



"To ensure new homes are accessible to all, residential development should include:

At least 10% of new build housing in proposals of 50 dwellings or more designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users (compliant with Building Regulations M4(3) Category 3: Wheelchair user dwellings).

All new build housing designed to be accessible and adaptable (compliant with Building Regulations M4(2) Category 2: Accessible and adaptable dwellings) except for those dwellings that are designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users."





## Recommendation

The evidence presented in this document demonstrates an existing and growing need for adaptable and accessible homes across Lancashire and provides sufficient justification for introducing the optional standards M4(2). With only 7% of existing homes meeting accessibility standard [10] and only one new accessible home is planned for every 15 people over 65 by 2030 [3], there is not enough housing neither currently available nor planned to meet demand. If only a proportion of new homes were built to M4(2) standard in the future, individuals will not have a fair and equal opportunity to live in homes that are adaptable. We want houses that offer a lifetime home and can grow with a person and family as they age. Therefore, to ensure equity and fairness across the county, we recommend:

**100% of all new build homes should be built in accordance with the requirements laid in out in M4(2) Accessible and Adaptable Dwellings unless this is superseded by M4(3) building regulations or other specialist requirements.**



## References

- [1] Centre for Aging Better, “Home and dry - The need for decent homes in later life,” 2020.
- [2] Royal Institute of British Architects & Centre for Towns, “A Home for the Ages - Planning for the future with age-friendly design,” 2019.
- [3] Centre for Ageing Better, “Homes for life - It's time to build the homes we need,” 2020.
- [4] Department for Communities and Local Government, “A Decent Home: Definition and guidance for implementation,” 2006.
- [5] Ministry of Housing, Communities & Local Government, “Housing health and safety rating system (HHSRS) operating guidance: housing inspections and assessment of hazards,” 2006.
- [6] Ministry of Housing, Communities & Local Government; Department for Levelling Up, Housing and Communities; “Access to and use of buildings: Approved Document M,” 2015.
- [7] Department for Communities and Local Government, “Housing Standards Review - Final Implementation Impact Assessment,” 2015.
- [8] Local Authority Building Control (LABC), “Building Regulations Approved Document Part M in a Nutshell,” Local Authority Building Control (LABC), 25 07 2016. [Online]. Available: <https://www.labc.co.uk/news/building-regulations-approved-document-part-m-in-a-nutshell>. [Accessed 30 09 2021].
- [9] Habinteg; Equality and Human Rights Commission, “Housing and disabled people - A toolkit for local authorities in England: Planning for accessible homes,” 2018.
- [10] Manchester School of Architecture, “Rightsizing: Reframing the housing offer for older people,” 2018.
- [11] Public Health England, “Emergency hospital admissions due to falls in people aged 65 and over,” Public Health England, 2019/20. [Online]. Available: <https://fingertips.phe.org.uk/search/emergency%20hospital#page/4/gid/1000042/pat/6/ati/102/are/E10000017/iid/22401/age/27/sex/4/cat/-1/ctp/-1/cid/4/tbm/1/page-options/car-do-0>. [Accessed 15 10 2021].
- [12] Census 2011; Nomis; “Household composition by number of people in household with a long-term health problem or disability,” Census 2011, 2011. [Online]. Available: <https://www.nomisweb.co.uk/census/2011/dc1301ew>. [Accessed 05 October 2021].
- [13] Department for Work and Pensions, “Family Resources Survey: financial year 2019 to 2020,” Department for Work and Pensions, 25 March 2021. [Online]. Available: <https://www.gov.uk/government/statistics/family-resources-survey-financial-year-2019-to-2020>. [Accessed 18 October 2021].



- [14] Annual Population Survey; Nomis, “Annual Population Survey,” Annual Population Survey, 2021. [Online]. Available: <https://www.nomisweb.co.uk/datasets/apsnew>. [Accessed 08 October 2021].
- [15] Habinteg; Papworth Trust; “The hidden housing market - A new perspective on the market case for accessible homes,” 2015.
- [16] Ministry of Housing, Communities & Local Government, “English Housing Survey, 2019 to 2020: home adaptations,” Ministry of Housing, Communities & Local Government, 8 July 2021. [Online]. Available: <https://www.gov.uk/government/statistics/english-housing-survey-2019-to-2020-home-adaptations>. [Accessed 18 October 2021].
- [17] Ministry of Housing, Communities and Local Government, “Raising accessibility standards for new homes,” 2020.
- [18] Department for Levelling up, Housing and Communities; Ministry of Housing, Communities & Local Government, “Housing for older and disabled people,” 26 June 2019. [Online]. Available: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>. [Accessed 12 11 2021].
- [19] Public Health England; Centre for Aging Better, “A consensus on healthy ageing,” 2019.
- [20] HM Government , “National Disability Strategy,” 2021.
- [21] Habinteg, “Forecast for Accessible Homes 2020,” 2021.
- [22] Royal Institute of British Architects, “Standards for accessible housing in England,” 03 May 2018. [Online]. Available: <https://www.architecture.com/knowledge-and-resources/knowledge-landing-page/accessible-housing-in-england>. [Accessed 18 November 2021].