

MAYOR OF LONDON

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Mayor of London response to MHCLG consultation: Raising accessibility standards for new homes consultation

Date due 1/12/2020

Summary

MHCLG is consulting on options to [raise the accessibility of new homes](#). In particular, it considers how the accessible and adaptable standard for homes (M4(2) in Part M of the Building Regulations) and the wheelchair user standard (M4(3)) are currently used as optional technical standards.

The requirements used in the Approved Document 2015 are:

- M4(1) Category 1: **Visitable dwellings** - sets basic standards for all new homes.
- M4(2) Category 2: **Accessible and adaptable dwellings** - sets a higher standard for accessible homes, broadly equivalent to the Lifetime Homes Standard.
- M4(3) Category 3: **Wheelchair user dwellings** - sets a standard for wheelchair adaptable homes (which includes design features to make a home easy to convert to be fully wheelchair accessible) and wheelchair accessible homes (which includes the most common features required by wheelchair users).

Currently, M4(1) is a mandatory standard and M4(2) and M4(3) are optional requirements for dwellings which local authorities can apply through planning policies where they have identified a local need and where the viability of development is not compromised.

The Government is considering raising the minimum access standard to M4(2) and is seeking views on five options to raise the accessibility of new homes. These are outlined below including the proposed officer response.

Since 2016, after the Government introduced the optional technical housing standards, London Plan policy has required 90 per cent of new-build dwellings to be built to M4(2) standards and 10 per cent to M4(3). The standards are well established in London. The London Plan Annual Monitoring Report (AMR) from October 2015 to March 2016 showed that 96.3 per cent of new-build homes achieved M4(2) or M4(3).

It is recommended that our preferred policy option is Option 4, to require M4(2) as a minimum (with M4(1) applying by exception only) and a set percentage of M4(3), but with an improved standard for M4(1) (Option 5) where exemptions apply.

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Response to consultation questions

Question 1 Respondent details:

Greater London Authority

Please state whether you are responding as an individual or the organisation stated above

Responding as an organisation

Question 2 Please indicate whether you are applying to this consultation as a:

Regional Authority

Question 3 - Do you support the Government's intention to raise accessibility standards of new homes? YES/NO Please explain your reasons

Yes, the Mayor of London fully supports the Government's intention to raise the accessibility standards of new homes. The London Plan has had planning policy requirements for accessible housing since the first version of the London Plan published in 2004. Pre-2015, the London Plan required that 100 per cent of new homes met the Lifetime Homes Standards and 10 per cent were wheelchair accessible or adaptable. Since 2016, after the Government introduced the optional technical housing standards, London Plan policy has required 90 per cent of new-build dwellings to be built to M4(2) standards and 10 per cent to M4(3). The London Plan Annual Monitoring Report (AMR) from October 2015 to March 2016 showed that 96.3 per cent of new-build homes achieved M4(2) or M4(3). These London Plan policies have, over the last 16 years, been successful in increasing both the number of accessible properties built in London, and the level of choice for people who require accessible housing. The requirement to deliver accessible housing is well embedded in London's development industry.

Analysis of London's 35 Local Plans in the Town and Country Planning Association's (2019) report 'London - Planning for a Just City' showed that 94 per cent were in line with the draft new London Plan requirements of 10 per cent M4(3) and 90 per cent M4(2), while 6 per cent (two Local Plans) did not specify any requirements.¹ However, these boroughs could apply London Plan policy, as the London Plan forms part of borough Development Plans. As highlighted by the Government, raising accessibility standards may result in lower familiarisation costs and shorter familiarisation time amongst local planners if the policy is mandated nationally.

The Equality and Human Rights Commission (EHRC) (2018) inquiry 'Housing and disabled people: Britain's hidden crisis' highlights a chronic shortage of accessible homes.² For example, in England only 7 per cent of homes offered minimal accessibility features (DCLG, 2015a and Design Council, 2018). The Government's own consultation document estimates that only 10 per cent of new dwellings meet or exceed M4(2). Therefore, as highlighted by the EHRC (2018) inquiry there is a chronic shortage of accessible homes for disabled people, affecting their ability to live independently.

¹ Town and County Planning Association (2019) [London – Planning for a Just City. Exploring how local planning authorities are embedding equality and inclusion in planning policy](#)

² Equality and Human Rights Commission (2018) [Housing and disabled people: Britain's hidden crisis](#)

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Twenty-one per cent (13.3 million) of people in the UK reported a disability in 2017/18.³ The London School of Economics (LSE) (2016) report 'No Place Like an Accessible Home' found that at least 1.8 million households (one in twelve of all households) in England have an identified need for accessible housing.⁴ 0.7 million households (around one in thirty of all households) have more significant needs corresponding roughly to Building Regulations M(2) or M(3) (LSE, 2016). The real need is estimated to be higher however, as the English Housing Survey does not include figures for disabled children requiring accessible housing. Among all households with a wheelchair user, 84 per cent (685,000) lived in a home that did not have full visitability including the 19 per cent (158,000) who lived in a home that lacked any of the four features (DCLG, 2016)⁵. Terraced (41 per cent) and semi-detached (34 per cent) houses were far more likely to have none of the four accessibility features than detached houses (9 per cent) or flats (10 per cent). VISIBLE features are also unlikely (on their own) to ensure homes are suitable for disabled people to live in on a day-to-day basis (LSE, 2016).

In terms of London, the GLA (2018) report 'Equality, Diversity and Inclusion Evidence Base for London' highlighted that there are 1.3 million disabled adults (not including under 16's), comprising 19 per cent of London's population, rising to 26 per cent of the population aged 65 and over.⁶ Accessible housing is important for many groups, including disabled people, older people and people with small children. The Family Resources Survey (2015) showed that 1.8 million households in London included either a disabled person, older person (65+) or child under 5 in 2014.⁷

The result of inaccessible homes is that disabled people wait long periods of time, even for minor adaptations to make their living conditions acceptable. Eight per cent of all households in England say that the illness or disability of one or more household members requires adaptation(s) to the home (GLA, 2019). This is 6 per cent for London – around 180 000 households. A relatively high proportion of people who require a home adaptation in London are looking to move to more suitable accommodation - around 20,000 households say they are currently attempting to move. This is 12 per cent of people who require a home adaptation in London, compared to 8 per cent at the national level (GLA, 2015).

Disabled people are also more likely to be living in poverty and therefore less likely to be able to afford adaptations. Research by MHCLG (2016) showed that one of the most cited reasons for not getting required adaptations is not being able to afford the adaptation. Leonard Cheshire Disability (2015) surveyed local authorities and found that almost half (44 per cent) had examples of disabled people waiting more than two years for payment of grants to make adaptations.

It is important also to raise standards for accessible housing to meet the needs of an ageing population, as outlined by the Government. Thirteen per cent of the working age population are disabled, while 28 per cent of people are aged 65 or over (ONS 2019). The number of Londoners aged 65 or over is projected to increase by 86 per cent between 2019 and 2050, faster than

³ Office for National Statistics (2019) Family Resources Survey 2017/18

⁴ DCLG (2016) English Housing Survey Adaptations and Accessibility Report 2014-2015

⁵ The English Housing Survey sets out four key visitability features considered to be the most important for enabling people with mobility difficulties to either access their home or visit someone else's home. These are level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space, and a WC at entrance level.

⁶ Greater London Authority (GLA) Intelligence (2018) [Equality, Diversity and Inclusion Evidence Base for London](#)

⁷ Department for Work & Pensions, Family Resources Survey – 2013/14, June 2015

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younger age groups (GLA City Intelligence Unit, 2018). Therefore, there will be a growing need for infrastructure that supports an ageing population, including accessible housing (Compass, 2017). Eighty-five per cent of current homes will still be standing in 50 years, so it is essential that we also address the issue of making current housing accessible.

Finding appropriate, accessible housing can transform people's lives for the better, enabling disabled people to live independently, improving health and wellbeing, and enhancing prospects for employment and study where homes meet individuals' accessibility requirements (EHRC, 2018).

Raising the accessibility standards of new homes could also support working age disabled people's employment rates. Londoners with a health condition or disability that limits their day-to-day activities are much less likely to be in work (GLA, 2019). Fifty-two per cent of disabled Londoners are in employment, versus 78 per cent among people who are not disabled, a 26-percentage point gap.⁸ The English Housing Survey 2014 to 2015 highlighted that nearly half of households (47 per cent) that wanted to move somewhere more suitable for their needs contained a person with a long-term disability aged under 55 (DCLG, 2016). Research by the LSE (2016) showed that 580,000 (one third) of households that have an identified need for accessible housing in England are working age. Raising the accessibility standards of new homes could significantly improve disabled people's employment rates, particularly if the expectation to work more flexibly and from home - as we have seen during the current crisis for many roles - continues in the long-term. Disabled people have been disproportionately negatively impacted by Covid-19 in health, social and economic terms. Accessible housing is key to ensuring that as many people as possible maintain a good quality of life, remain socially and economically active including having the option to work from home comfortably if they need to in the future.

There is strong evidence that housing that meets people's needs will save on health and social care costs in the future, as well as considerably lowering the cost of adaptations when they are needed (EHRC, 2018).

Ensuring that accessibility standards are raised in a coherent strategy nationally would help to ensure that disabled people are able to live with [dignity](#), improve employment opportunities and reduce the need for adaptations, adult social care and occupational therapy in the future.

It is also important that people are able to easily find out the standard that a new dwelling complies with. The London Development Database (LDD) provides this information for new dwellings in London. Similar to energy assessment ratings, a simple way of highlighting the level with which a new dwelling complies could support people's choice and decision making with regard to finding accessible homes. The Mayor has made the LDD data easily accessible through the Accessible and Specialist Older Persons housing locator.⁹

Question 4 Which of the 5 options do you support? You can choose more than one option or none. Option 1/2/3/4/5/None Please explain your reasons, including the advantages and disadvantages of your preferred option(s).

⁸ Annual Population Survey Jul 2016 – Jun 2017

⁹ <https://www.london.gov.uk/what-we-do/planning/accessible-housing>

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Preferred options - 4 and 5

Option 4: To mandate the current M4(2) requirement in Building Regulations as a minimum standard for all new homes with M4(1) applying by exception only, a set percentage of M4(3) homes would also need to be applied in all areas. So rather than local authorities setting a local planning policy for the provision of M4(3), a defined and constant percentage would apply to all new housing.

London Plan policy already mandates M4(2) as the minimum standard unless exemptions apply. Percentages should be set for both M4(2) and M4(3) that do not lower any existing targets within Local Plans and should be high enough to meet the long term need for accessible housing.

The percentage of M4(3) homes should be set at a minimum of 10 per cent but allowing for this to be raised where there is greater demand in local planning authority areas and where the 10 per cent target might not sufficiently reduce long waiting times for wheelchair-accessible housing. This is supported by the EHRC (2018) which has called for the UK Government to amend M4(2) so that it is the default and the mandatory minimum standard for the design and delivery of all new housing and to mandate that all local authorities must ensure that a minimum of 10 per cent of new-build houses across all tenure types are built to higher wheelchair-accessible standards (M4(3)). The consultation feedback on the GLA Housing Standards Viability study for the London Plan 2016 also showed majority support for 10 per cent wheelchair accessible housing from housebuilders and developers.¹⁰

The remaining percentage of homes should meet M4(2), as per London Plan policy. All units with direct access at ground floor should be provided as M4(2).

If M4(1) were to remain, the standard should be raised as set out in the response to option 5 below and exemptions when this standard is defaulted to should be clearly set out. A cap or maximum percentage of M4(1) new-build dwellings could be introduced to ensure that the vast majority of new-builds are accessible. This would support the changing needs of people over their lifetime, ensuring that people can live well and independently for longer in their homes.

Option 5: Change the content of the mandatory technical standard. This could be done by upgrading the statutory guidance to create a revised M4(1) minimum standard. This revised standard could be pitched between the existing requirements of M4(1) and M4(2), adding more accessible features into the minimum standard.

Should M4(1) remain in place as an exemption, it is imperative that the standard is revised and raised. A suite of higher access standards should be set out with those that are implementable, incorporated into schemes to ensure homes that cannot implement M4(2) or M4(3) are still as accessible as possible. Potential measures, for example include ensuring sufficient space in entrance ways and hallways and on stairs for stairlifts - where lift access is not viable, lowering the rise on steps, where possible.

¹⁰ [GLA Housing Standards Review Viability Assessment Appendices](#)

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M4(2) should also be raised. For example, M4(2) should require a clear turning circle 1500mm in diameter provided in the entrance area, behind the entrance door when closed - this is currently only required for M4(3). M4(2) refers to 'reasonable reach for wall sockets' however this needs to be more clearly defined to ensure that wherever possible wall sockets meet the needs of wheelchair users. M4(2) should require that door entry and lift controls are accessible, and lobby or porch doors are a minimum of 1500mm apart, with a minimum of 1500mm clear space between door swings. M4(2) refers to ramped approach routes and minimum landing distances and depths, however it is important to ensure that entrance hallways and stairs have sufficient space for wheelchairs and stairlifts.

M4(2) should also incorporate space for a member of the household to temporarily sleep on the entrance level if needed (e.g. after a hip operation) as had been required by the Lifetime Homes standards. Sufficient space for storage of mobility scooters and buggies should also be considered.

M4(2) should also require a power socket for powering a stair-lift is provided close to the foot or head of any stair to which a stair lift may be needed. Additionally, accessible taps which are lever operated, double sockets and toilet handles suitable for people with limited grip, should also be required as per M4(3). These additions to M4(2) are simple changes that would reduce disabled people's need for adaptations in the future and improve their quality of life and independence.

As set out in London Plan policy, all the standards should require evacuations lifts, in addition to fire fighter's lifts, where lift shafts are provided.

It is important that the standards adopt an inclusive design approach, based on the social model of disability, recognising the needs of people with hidden or invisible disabilities as highlighted during the House of Lords Committee on the Equality Act 2010 and Disability evidence session in 2015¹¹. A study by PRP Architects commissioned by MHCLG found that the Approved Document M needed to be improved to address the needs of older people, people with complex and multiple disabilities and people with cognitive impairments, whilst also reflecting advances in the built environment to supporting people affected by sight loss and people with a hearing impairment¹². It is important that the standards adopt an approach which supports people with hidden or invisible disabilities, including mental health and neurodiverse conditions, and recognises that conditions can fluctuate. Also, people's mental wellbeing can deteriorate caused by the stress of living in unsuitable accommodation and facing an uncertain future (EHRC 2018).¹³

Therefore, our preferred policy option is Option 4, to require M4(2) as a minimum (with an improved M4(1) applying by exception only) and a set percentage of M4(3).

Comments on the remaining options are set out below.

Option 1: Consider how recently revised planning policy on the use of optional technical standards impacts on delivery of accessible housing.

¹¹ <https://parliamentlive.tv/Event/Index/47c5a298-bef4-4fa8-a22f-61bca35af5e7>

¹² MHCLG (2018) [Government response to the Report of the House of Commons Women and Equalities Committee Building for Equality: Disability and the Built Environment.](#)

¹³ EHRC (2018) [The housing experiences of disabled people in Britain](#)

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Option 1 is not supported as London Plan policy already sets M4(2) as the minimum accessibility with over 96 per cent of schemes meeting or exceeding this standard from October 2015 to March 2016. In addition, the London Plan sets a 10 per cent target of homes to meet M4(3).

The Minor Alterations to the London Plan Evidence in Public Matter Statement 1 Housing Standards highlighted the lack of accessibility of existing housing stock for older and disabled people and the issue of the time lag between approvals and completions, particularly for approved large schemes.¹⁴ The overall quantity of modern accessible and adaptable stock nationally is insufficient to address the needs of disabled and older people, and hence it is important for accessibility standards nationally to be raised. Including standards in the Building Regulations can have a more immediate impact than through planning policy.

The English Housing Survey for 2018 showed that only 9 per cent of all dwellings had all four accessibility features whilst just 18.8 per cent had level access to the main entrance.¹⁵ In 2009 only 1.5 per cent of all dwellings had a stair lift adaptation and only 8.5 per cent had any adaptations. These figures only increased to 2.1 per cent and 9.4 per cent respectively in 2018, whilst the figure for a ramp adaptation for all dwellings reduced from 1.9 per cent to 1.7 per cent from 2009 to 2018. In 2018 just 2.5 per cent of all dwellings had a kitchen adapted for disabled use, 7.2 per cent had a bathroom adapted for disabled use and 10.8 per cent had a level access shower. These figures highlight the very limited progress nationally and the urgent need for accessibility standards of new homes to be raised nationally and immediately if we are to meet the needs of disabled people and an ageing population.

Option 2: To mandate the current M4(2) requirement in Building Regulations as a minimum standard for all new homes, with M4(1) applying by exception only where M4(2) is impractical and unachievable (e.g a new build flat above a garage). M4(3) would apply where there is a local planning policy in place in which a need has been identified and evidenced.

Mandating the current M4(2) requirement in Building Regulations as a minimum standard for all new homes is supported, however targets should be set for the amount of M4(2) and M4(3) homes to be built, as per London Plan policy, which is 90 per cent and 10 per cent (minimum) respectively. Any exemptions should be made clear and the M4(1) standard raised as per option 5 as highlighted, with the reasons set out above.

Option 3: Remove M4(1) altogether, so that all new homes will have to at least have the accessible and adaptable features of an M4(2) home. M4(3) would apply where there is a local planning policy in place in which a need has been identified and evidenced. This would mean that no new homes could be built as M4(1).

The ambition of this option is supported. The Viability Assessment for the GLA Housing Standards review in 2015 showed that the impact of Optional Requirement M4(2) step free access on the

¹⁴ [Minor Alterations to the London Plan Evidence in Public Matter Statement 1 Housing Standards](#)

¹⁵ The four accessibility features set out in the English Housing Survey are WC at entrance level, doorsets and circulation meet Part M, level access to main entrance and flush threshold below

15mm <https://www.gov.uk/government/statistics/english-housing-survey-2018-accessibility-of-english-homes-fact-sheet>

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deliverability and viability of housing development in London was minimal. Concern was only raised for low rise blocks (consisting of four storeys or below), and in particular the service charge for affordable housing units.¹⁶

In this context, it is recognised that in limited circumstances there is a balance between achieving greater accessibility and maintaining viability. In certain extreme circumstances it may not be viable to provide step-free access, however all options for including accessibility measures should be fully explored. The Intend to Publish London Plan recognises that there may be difficulties in making certain types of dwellings accessible in terms of the provision of a lift, such as a new build flat above a garage and for developments of 4 storeys or less. The Building Regulations already allow for some non-compliance stating that 'Requirements for accessibility should be balanced against preserving historic buildings or environments, as a general principle'. However, a more detailed assessment process, for example to evaluate viability may not be possible through the Building Regulations, or would have to be clearly set out in the Approved Document.

As stated above, if M4(1) is retained, the standard should be revised and raised as per option 5 (for example by ensuring sufficient space for a stairlift) and a cap set to ensure that sufficient numbers of homes are built that meet the needs of older and disabled people now and in the future.

In addition, limitations in the application of Building Regulations mean that the optional accessibility standards M4(2) and M4(3) generally cannot be applied to dwellings resulting from conversions and change of use proposals. The London Plan includes the accessibility standards for dwellings, which includes new build, conversions and change of use. On average around 9 per cent of overall housing completions in London are from change of use schemes and conversions.¹⁷ M4(2) should be applied particularly to ground floor units and large extensions and large conversions including change of use from office to residential under Permitted Development Rights, where buildings are over 4 storeys. Exemptions should be made explicit in order to maximise opportunities to raise accessibility within schemes. For example, M4(2) applies to some wheelchair users only with some wheelchair users being able to access the dwelling, the accommodation and its sanitary facilities and WC facilities on the entrance storey but not all.

Over time the requirements of M4(2) and therefore the costs, should be embedded in the land value of smaller schemes. There is also the possibility of smaller schemes needing to comply with other M4(2) requirements even if they are exempt from having to provide level access, however wherever possible it is key that all options for ensuring accessibility are fully explored.

Local Planning Authorities should not be required to demonstrate evidence for M4(3) units as the current and growing need, due to for example an ageing population, is already clear and has been highlighted in this consultation. Since 2004, the London Plan has included requirements for new housing to be wheelchair accessible or adaptable so the principle is embedded in London and should not have to be justified afresh with each review of the Plan.

Question 5 If you answered 'None' to Q4, do you think the government should take a different approach? YES/NO If yes, please explain what approach you consider favourable and why?

¹⁶ [GLA Housing Standards Review Viability Assessment 2015](#)

¹⁷ London Development Database statistics - housing completions 2004/5 to 2014/15

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N/A - please see response to question 4.

Wheelchair accessible homes should apply across all tenures rather than just to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The presence of a wheelchair user in private rented accommodation remained at 1.4 per cent from 2007/8 to 2017/8, compared to 3.3 per cent for owner occupiers, 6.6 per cent for housing associations and 7.8 per cent for local authority tenure.¹⁸

One in four households needing accessible housing (480,000) have incomes above the median income of all owner occupier households, suggesting a significant capacity to become owners; one million households including a person with a disability requiring accessible housing are already owner-occupiers, of whom 230,000 are of working age; households including a person with a disability have similar interests and motivations for moving home as others, although their requirements may differ (LSE, 2016).

Question 6 Do you agree with the estimated additional cost per dwelling of meeting M4(2), compared to current industry standards, in paragraph 45? YES/NO/DON'T KNOW If no, please comment on what you estimate these costs to be and how you would expect these costs to vary between types of housing e.g. detached, semi-detached or flats? Please provide any evidence to support your answers.

Yes

The GLA Housing Standards Review 2015 Viability Assessment addressed the potential impact of the standards on the London housing market and assessed a number of scheme types across 43 locations. It concluded that the implementation of the housing standards would not have significant consequences for the viability and delivery of housing in London.

The viability assessment found no measurable cost impact from the Building Regulation optional requirement for the provision of Wheelchair User Housing M4(3) as this was no more onerous than existing (pre-2016) London Plan requirements for 10 per cent wheelchair housing.

The viability assessment also considered the impact of the Building Regulation optional access requirements M4(2) and found that the new housing standards did not represent a significant determinant in the viability and the deliverability of housing development in London.¹⁹ It showed that the estimated cost impact of the optional access requirements represented circa an additional 2-2.4 per cent of base build cost for small low rise developments. The viability assessment showed that the impact of Optional Requirement M4(2) step free access on the deliverability and viability of housing development in London was minimal (and only relevant for units consisting of four storeys or below).

Evidence showed an indicative lifecycle cost for a lift for a low-rise residential development of £120,000 over a period of around 25 years, equating to £4,800 annually per lift in 2015. For the

¹⁸ [MHCLG \(2020\) English Housing Survey 2018](#)

¹⁹ [GLA Housing Standards Review Viability Assessment 2015](#)

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smallest blocks tested accommodating 12 flats this would result in an additional service charge of £400 per annum or £33 per calendar month (less than £1 per sq ft per annum for the smallest 1 bedroomed flat). For the larger block with twice as many units per floor, the amount was suggested to be half. The cost was not believed to be a significant determining factor for market units.

The impact of the cost of the additional lifts was found to be very minor, with only one benchmark band in one of the boroughs (Hillingdon) tested moving from viable to unviable.

In testing the viability impact of the standards, no account was taken of the potential for cost savings as a result of reduced process costs and increased certainty of design requirements. E C Harris on behalf of DCLG found that the overall standards including process costs indicated a potential saving of between £3,625 and £5,426 per dwelling.²⁰ Assuming an average dwelling size of 75m², the estimated cost saving per m² would be in the order of £48 - £72. This would negate the additional costs identified above for standard M4(2).

Evidence for the Minor Alterations to the London Plan showed that overall, the provision of lifts in blocks of four storeys or less would not have a significant impact on viability or delivery. The Inspector's report confirmed that no substantive evidence was presented that would lead them to conclude that there would be a significant risk to development as a result of applying the M4(2) and M4(3) requirement.

In the viability study that supported the Intend to Publish London Plan, 10 per cent of units were assumed to be M4(3) with the remainder M4(2), as per the existing London Plan policy²¹ at the time. The potential for M4(3) to attract a higher market premium was noted. The M4(2) unit sizes were based on existing GLA dwelling standards, which were retained.

The study noted that the size of dwelling affects both their market value and their development costs. Whilst larger units have higher development costs, they also attract a higher premium. By requiring a larger unit size, the costs increase, but the values also potentially increase which is likely to offset or exceed an increase in costs. Design standards should be reflected in land values so any cost which is likely to be marginal will be passed onto landowners. This may not apply to sites that have been purchased outright, but in many cases the transaction will take place subject to planning and so should be reflected in the land value.

The standards are well established in London. Even if the cost is not offset by additional values or passed onto the landowner, a cost of £1,400 per unit is very small as a proportion of development value and is unlikely to make an otherwise viable development undeliverable.

Overall, it was reasonably concluded that the impact of Optional Requirement M4(2) step free access on the deliverability and viability of housing development in London was minimal (and only relevant for units consisting of four storeys or below) and was insufficient to be considered to

²⁰ Department for Communities and Local Government Housing Standards Review Cost Impacts September 2014 E C Harris

²¹ Greater London Authority (2016) [The London Plan The Spatial Development Strategy for London Consolidated with Alterations since 2011](#)

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challenge the overall viability of housing delivery, including during a downturn in market conditions.

Finally, the EHRC (2018) report 'Housing and disabled people: a toolkit for local authorities in England' highlights the extra costs of build and space for each of the optional standards, when compared to M4(1). The figures show the extra costs of access-related space allowing for some cost recovery via sales. The total cost for M4(2) varies from £1,229 for a 1-bedroom apartment to £1,386 for a 4-bed detached home.²²

By raising the accessibility standards of new dwellings, the costs would also be brought forward and therefore cheaper in real terms than if the Government were to wait until a person required the changes in the future.

Question 7 Do you agree with the proportion of new dwellings already meeting or exceeding M4(2) over the next ten years in paragraph 45? YES/NO/DON'T KNOW If no, please comment on your alternative view and how you would expect this to vary between types of housing e.g. detached, semi-detached or flats? Please provide any evidence to support your answers.

No – the proportion of new dwellings already meeting M4(2) is estimated to be lower nationally than that set out in this consultation document. The report by the Equality and Human Rights Commission (2018) 'Housing and Disabled people: Britain's Hidden Crisis' showed a chronic shortage of accessible homes. Other data sets out that in England only 7 per cent of homes offered minimal accessibility features (DCLG, 2015a and Design Council, 2018). Therefore, there is a chronic shortage of accessible homes for disabled people, affecting their ability to live independently (EHRC 2018).

The proportion of new dwellings meeting M4(2) is much higher in London. Between 1st October 2015 to 31st March 2016, the London Plan Annual Monitoring Report (AMR) 2015/16 showed 86.3 per cent of approved new build homes met M4(2) and 10 per cent met M4(3).²³

The Government estimates that the proportion of M4(2) would reach 30 per cent even without Government intervention, however it is not clear how this would be achieved without mandating M4(2) as a minimum requirement and setting targets for M4(2) and M4(3). The Government's own figures are unclear as the consultation document says (in paragraph 32) that with the use of M4(2) the proportion of homes built to Lifetime Homes Standard would increase from 31 per cent in 2015 up to 45 per cent by 2024. However, in paragraph 45 the Government states: 'We estimate that 10 per cent of new dwellings already meet or exceed M4(2), and that this percentage would grow over time even without Government intervention, to 30 per cent in 10 years' time.' Without mandating M4(2) as a minimum standard it is not believed significant progress will be made towards meeting the needs of disabled people nationally.

²² [Equality and Human Rights Commission \(2018\) Housing and Disabled People A toolkit for Local Authorities in England: Planning for Accessible Homes](#)

²³ [London Plan Annual Monitoring Report 2015/2016](#)

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Question 8 Do you have any comments on the costs and benefits of the other options set out above? YES / NO If yes, please provide your comments including any evidence to support your response.

Yes

The costs are likely to be offset from the benefits and savings in the long-term from other services such as the NHS and adult social care. For example, the need for the Disabled Facilities Grant, which supports around 50 000 people a year in England and Wales and which cost £505m in 2019/20, would likely fall. In 2015, applications had risen by 66 per cent since 2011/12, but the number of adaptations that were funded had only risen by 33 per cent over the same period (Leonard Cheshire, 2015).

By raising the accessibility of housing, people are far less likely to have to move into residential care.

It would also help to eliminate the 'postcode lottery' in relation to adaptations supporting people's health and wellbeing across the country.

Adapting a home can increase its usability and enable people to maintain their independence. Home adaptations, particularly insofar as they can reduce health and social care costs, help to avoid lengthy stays in hospital, or the need for more intensive housing options such as care homes (Heywood and Turner, 2007). A study measuring social return on investment demonstrated that, on average, each adaptation saved the Scottish health and social care system over £10,000 (Kempton and Warby, 2013).

The EHRC (2018) report 'Housing and disabled people: a toolkit for local authorities in England' estimates some typical public expenditure savings accrued when adaptable and accessible homes are provided.²⁴ Early move to a residential care home was estimated to cost £26,500 to £38,500 per year and falls on the health or social care budget. Early move to a residential home with nursing care was estimated to cost £34,500 to £54,000 and falls on the household or social care budget. A single extra night in a hospital due to temporary access needs not being met was estimated to cost £400 and falls on the NHS. A ramp to the threshold and the widening of a door of an M4(1) home was estimated to cost £1,000 to £2,000 depending on the requirements and falls on the household or Disabled Facilities Grant (Better Care Fund) budget. Therefore, in the long-term improving accessible housing is likely to bring significant savings across the public sector and for individual households. The cost of meeting M4(2) would most likely be offset by the benefits.

The Government's response to the Women and Equalities Committee inquiry on disability and the built environment in 2015 also noted that 'if the Category 2 (M4(2)) standard were to be set as the statutory minimum for all new dwellings...these extra costs would be small in relation to the overall build cost of a new home.'

²⁴[Equality and Human Rights Commission \(2018\) Housing and Disabled People A toolkit for Local Authorities in England: Planning for Accessible Homes](#)

MAYOR OF LONDON

Question 9 Do you have any comments on the initial equality impact assessment? YES / NO If yes, please provide your comments including any evidence to further determine the positive and any negative impacts.

Yes

Officers would welcome sight of an equality impact assessment which reviews the equality impacts on protected groups for each of the options proposed and how the options might disproportionately affect sub-categories within protected characteristics. The Equality Impact Assessment currently does not explore the issues in enough depth for the public to understand the implications nor does it sufficiently link the implications to evidence. The comments set out below are examples of how these issues should have been explored more fully.

The evidence set out within this response highlights the urgent need for the accessibility standards of new homes to be raised. The Government's consultation document highlights the urgent need for accessibility standards to be raised nationally and the negative impacts that disabled people currently experience from an insufficient supply of accessible homes.

Most people at some point in their lives will require accessible housing. Accessible housing benefits older people, disabled people and people with small children and buggies etc. Certain groups are more likely to be affected by disability or poor physical and mental health – such as Black and Asian Minority Ethnic groups, women and people from lower socio-economic backgrounds. Inequalities exist in the proportion of life expectancy lived in good health and 'disability free', defined as the number of years lived without a long-lasting physical or mental health condition that limits daily activities. For example, women born in 2016 are expected to spend 75.6 per cent of their lives disability free. This is lower than the disability free life expectancy for men of 79.4 per cent (GLA, 2019). On average, men in the most deprived areas are expected to live 70.2 per cent of their lives in good health, well below the good health percentage of men living in the least deprived areas (85 per cent) (GLA, 2018). There are significant benefits from improving accessible housing including improving independence, mental wellbeing and physical health, enhancing employment and study prospects and reducing the need for adult social care and household adaptations in the future.

Officers have identified potential negative impacts on protected groups from the consultation proposals. For example, option 1 would have severe negative impacts on disabled people, older people and other protected groups, such as women who live fewer disability free years than men and who are more likely to be lone parents with small children, as well as people with small children and prams and people who are on lower incomes. There is a chronic shortage of accessible housing nationally, which denies disabled people the right to live independently and with dignity.

It is important to meet the identified needs for wheelchair accessible/adaptable housing in order to promote social inclusion and reduce social inequalities. This also ensures that wheelchair users have an improved degree of choice, taking into account the fact that their housing choices are more limited than other households.