

About the Centre for Ageing Better

The UK's population is undergoing a massive age shift. By 2050, one in four people will be over 65. The fact that many of us are living longer is a great achievement. But unless radical action is taken by government, business and others in society, millions of us risk missing out on enjoying those extra years.

At the Centre for Ageing Better we want everyone to enjoy later life. We create change in policy and practice informed by evidence and work with partners across England to improve employment, housing, and challenge ageism in all its forms. We are a charitable foundation, funded by The National Lottery Community Fund, and part of the government's What Works Network.

Introduction

Increasing the number and availability of accessible homes is a key priority for the Centre for Ageing Better. In our role as co-chair for the Housing Made for Everyone (HoME) coalition our focus is on ensuring that all new homes are accessible and adaptable as standard, with local authorities to allocate the required number of wheelchair user homes for their area. Our other work focuses on the holistic improvement of existing homes, which includes accessibility.

Key recommendations:

- 1. Launch the secondary consultation on raising accessibility standards and implement the planned new regulatory baseline for all new homes without further delay.**
- 2. Revise the National Planning Policy Framework to explicitly require all local plans to include a specific policy and target for new wheelchair accessible M4(3) homes, and where no local target is set to require 10% of new homes to meet the standard.**
- 3. Develops a national cross-departmental strategy between housing, health and social care to make all homes accessible, safe, and warm.**
- 4. Further consult on the Disabled Facilities Grant, as the only remaining nationally funded route to accessing adaptations**
OR
Further act upon the recommendations from the existing reviews.
(Our detailed recommendations on DFG are in our response to Question 5).

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

Firstly, the government must introduce the secondary technical consultation for raising accessibility standards without further delay.

With over 400 responses to the initial consultation and with [98% of respondents supporting the government's intention to raise accessibility standards of new homes](#), there is a clear demand for change in this area.

Accessible and adaptable homes benefit everyone, but particularly disabled people, older people or those living with reduced mobility or a chronic health condition. Yet a home like this is a remote prospect for far too many people. The reality is that millions of us live in homes that do not meet our daily needs.

England's existing housing is simply not suitable for the diverse and changing needs of our ageing population, and often the new homes we build are not either.

As accessibility standards are currently optional and can be challenged by developers, the current planning system for ensuring adequate provision of the right homes for disabled people is not working.

Progressing the secondary consultation to work out the details of implementation and any necessary exceptions to a higher accessibility standard is vital to ensuring there are more accessible and adaptable homes for those who need them.

With other complex housing reforms currently underway and a General Election expected in the next 18 months, we are extremely concerned that further progress on this important change will be delayed or dropped following any change in government, leaving disabled and older people continuing to struggle to find homes that meet their needs.

The business case for accessible and adaptable homes has been made repeatedly, with consecutive governments committing to this change since 2008. However, implementation has repeatedly stalled.

Given that building regulations for accessibility are already established and the work to be undertaken is more about understanding exceptions, we would recommend that government considers separating accessibility from some of the more complex reforms and fast-tracks the secondary consultation to ensure that all new homes are 'accessible and adaptable' without further delay.

This stronger minimum standard would also allow local authorities to focus their capacity and expertise on understanding how many wheelchair-user homes are required for their community – an important part of housing provision for disabled people that should not be forgotten alongside 'accessible and adaptable' homes. Some further guidance and training may be required to ensure that local authorities have what they need.

Additional evidence on the value of wheelchair user homes in particular has been recently published by Habinteg in their 2023 report, '[Living not existing: the social and economic value of wheelchair user homes](#)'. The report found that the overall positive value of the benefits of new wheelchair accessible homes is far greater than the costs of building such homes – up to five times the initial cost.

In terms of existing homes, there must be some further consideration - with meaningful input from the housing, health, and disability sectors – on how to better facilitate home adaptations

for older housing stock as well as disabled tenants in the private rented sector via means such as the Disabled Facilities Grant. (See question 5 for further detail.)

2. Does the National Planning Policy Framework (NPPF) ensure the Equality Act 2010 is complied with when building housing?

There is more work to be done to ensure that the Equality Act is complied with when building housing. For example, it is only in a footnote that the NPPF mentions accessibility standards at all.

Wheelchair users are not mentioned in the main body text. This is a missed opportunity, given that wheelchair users are disproportionately disadvantaged by built environment if it is not designed in an inclusive way. This must be remedied, as at current building rates, [someone could be on a local authority waiting list for a new wheelchair user home for 47 years before one becomes available.](#)

It is estimated that up to 400,000 wheelchair users live in unsuitable accommodation in the UK, and that [20,000 people are on local authority waiting lists for a wheelchair user home.](#)

We urge that every opportunity is taken to ensure that Public Sector Equality Duty (PSED) opportunities are maximised.

There is a clear opportunity to ensure that proposals "advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it" in relation to disabled and older people equal as members of communities.

The Chartered Institute of Building (CIOB) have also raised that there is 'a considerable amount of confusion' regarding the planning requirements in England for accessible homes. Further, the CIOB notes that the NPPF does not require adequate information at planning application stage to determine whether requirements such as accessibility will be met.

We support its call to strengthen the collection of information at the planning stage through the NPPF to ensure sufficient supply of accessible housing.

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

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

While we welcomed the government commitment in July 2022 to raise accessibility standards for all new homes, over a year on there has been no public progress and no timetable provided for the implementation of the updated standard.

In this time, there have been multiple changes to government housing ministers, civil servants, and department structure, which appear to have further delayed action.

It is deeply disappointing that the announced secondary consultation on implementation of the new minimum standard has not been launched.

Given that there will likely also be a transition period, we are concerned that further delays will unacceptably impact the length of time during which disabled people will continue to have inadequate access to suitable homes.

In the meantime, most new homes that are in the process of being built will not meet accessibility standards, and many will need future adaptations at a greater cost to the public purse, not to mention the upheaval to residents who require adaptations.

While there was a welcome review of the Decent Homes Standard which included a review of the Disabled Facilities Grant (DFG) resulting in an increase of funding to £102 million over 2 years, this did not go far enough to resolve some of the key issues.

Following the independent DFG review of 2018 there was an expectation that there would be a full consultation on: an increase in the upper limit of awards; the allocation to local authorities; and the means test to align with social care charging. The commitment to this consultation was renewed in the updated Social Care White Paper of March 2022. It is unclear if this consultation will now go ahead or whether it has been superseded by the additional overarching funding, which will not resolve many of the issues people continue to have in accessing the grant.

We do not consider these actions at all sufficient and strongly recommend prompt action to remedy this – starting with the publication of the secondary technical consultation on raising accessibility standards for new homes including an announcement of the implementation timeline for the new standards.

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

Government

Government should implement higher mandatory accessibility standards without further delay, with clear rules for local authorities and developers to follow, and with exceptions to the standard kept to an absolute minimum.

Longer term, they should expand the role of bodies such as Homes England and the Planning Inspectorate to ensure a coherent and aligned policy context for delivering the homes that disabled people need. We would also recommend the development of a cross-departmental strategy for improving England's housing stock.

To address accessibility in the existing housing market, the government should consider introducing a nationally applicable mandatory accessibility assessment for sale or rental properties.

Local authorities

Local Authorities should maintain data on the accessibility of stock in their area as well as monitoring the accessibility of new homes built.

Every local planning authority should use the analysis provided by the LSE team in its [report](#) to help set a target for delivery of new wheelchair-user homes. Government should set a default target of 10% if no other target is established.

Local authorities should actively consult disabled and older people in the development of local area plans and the Planning Inspectorate should require evidence of this in the local area plan.

Allocations policy and practice for social housing should be improved to ensure better access for wheelchair users to suitable accommodation. This starts with understanding the accessibility of each home and providing clear information on this at the point of listing.

We recognise that local authority resources are stretched and that, according to the [Institute for Government](#), planning teams are among the most pressurised in the public sector. Provision of additional resource is an overarching requirement if we are to improve provision of accessible new homes.

However, if the recommendation to amend the regulatory baseline is implemented promptly, planning teams will be relieved of the need to differentiate targets for M4(2) homes in their local plans, which will free up capacity to better investigate the need for M4(3) homes.

It should also be noted that according to [LSE research commissioned by Habinteg](#), if more wheelchair user homes are built the biggest financial gains accrue to local authorities in the form of reduced social care expenditure, as accessible properties can reduce people's ongoing requirement for social care support at home as well as major costs incurred if a person requires residential care.

Developers

[Research by the EHRC in 2018](#) stated that many developers do not view accessible housing as profitable and as such, take steps to negotiate down the number of accessible homes built.

This research also illustrates the discrepancy between the proportion of developers not delivering sufficient amounts of accessible homes – calculated at 68% - and the amount of local authorities who subsequently take action against developers on accessibility grounds – at just 3%.

This clearly shows the consequences of local authorities not receiving adequate resource to ensure that accessible housing is delivered, as well as the accessibility standards currently remaining optional.

There should be clearer guidelines for developers on accessibility as well as best practice examples taken from those developers who already deliver 'accessible and adaptable' homes as standard minimum practice.

5. Does the Disabled Facilities Grant fully support housing adaptations?

No, the Disabled Facilities Grant (DFG) does not fully support housing adaptations.

As the only remaining nationally funded source of support for homeowners and landlords to make home repairs and adaptations, the DFG is a vital part of how we ensure that disabled people, older people or those living with reduced mobility, or a chronic health condition can adapt their homes.

However, there are some limits on its current application that require addressing, even with the [recent review of DFGs](#) via the review of the Decent Homes Standard, and the resulting [increase in funds from the government this year](#).

The [Social Care White Paper](#), ' (updated in March 2022) committed the government to consult on a new approach to DFG funding in 2022. This consultation has not yet happened at the time of writing in September 2023, and it is unclear whether it has been superseded by the increase in national government funding – if this is the case then the existing challenges with the DFG will not be resolved.

[Research into DFGs](#) highlights pressures around funding compared to levels of demand for adaptation works. The other key issues are that it is restricted to people with certain

accessibility needs and low incomes; the funding is not always enough to sufficiently adapt a home; and that it is limited to people's current needs and does not future proof a home.

In 2018, the government in place commissioned an [external review of DFGs](#), which identified several challenges such as these:

- A reduction in local authority contributions meaning that increased central government funding hadn't resulted in as many people being helped.
- Limited analysis of local needs and demand, and limited advertising of DFGs for fear of stimulating demand.
- Complexities within the delivery system.
- Restrictive upper limits on grants. High levels of 'dropouts' due to a requirement to contribute.
- Tenure inequalities – relatively few grants are issued to private sector tenants.
- A need for DFGs to evolve in line with changing expectations and advances in information technology to remain relevant.
- A need to move to a preventative 'investment' approach so decisions are made to support long-term health and wellbeing rather than tackling crises at the point they occur.

Many of the recommendations reinforced those of previous reviews and guidance but which had not been implemented. There are some key recommendations from the 2018 review which would benefit from being further addressed.

Key DFG recommendations:

- A joined-up approach in each local area between housing, health and social care. The first step to achieving this is the **creation of a cross-departmental housing strategy to ensure an integrated approach both nationally and locally**.
- **Updating the way that DFGs are allocated to local authorities to ensure better alignment with local demand.**
- **Developing a market**, i.e. supply that reflects the demand and that the grant is clearly and widely communicated for those who need it, and those who need to supply it.
- **Require private landlords to support applications made to the Disabled Facilities Grant (DFG) for adaptations through the Decent Homes Standard.** Currently 79% of landlords do not know that funding is available through the DFG, [according to National Residential Landlords Association](#).
- **Expand the DFG and its eligibility criteria** to cover a wider range of at-risk households and adaptation needs to help people in urgent need of home improvement, and both major and minor adaptations.
- **Ensure there is adequate revenue funding available** to ensure DFG capital allocation is well spent in local areas.
- This commitment needs to be backed up with long-term funding (including but not

exclusively DFG) to support local authorities to provide a one-stop-shop service on all aspects of home repairs and adaptations, with support and signposting on everything from finding trusted tradespeople and identifying what work needs to be done, to how to finance repairs and improve energy efficiency. We [call this service a Good Home Hub](#) and have been piloting this approach in Lincolnshire, and co-ordinating a Good Home Network with a number of local authorities to share best practice.

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

The UK has the oldest housing stock in Europe, with 80% of the buildings we will use in 2050 already built, much of it almost 100 years ago. That means that we must ensure that the housing stock that is already in use meets the needs of disabled people.

Figures released in the latest English Housing Survey showed that an overwhelming 91% of homes do not provide the four main features for even the lowest level of accessibility – a home that is ‘visitable’.

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

One option to make adaptations more accessible is through developing a cross-departmental national housing strategy, where routes for holistic home improvements including accessibility could be nationally mandated and locally delivered. One such route could be through the expansion and further development of home improvement agencies.

The government could support local authorities to provide a one-stop-shop service on all aspects of home repairs and adaptations, with support and signposting on everything from finding trusted tradespeople and identifying what work needs to be done, to how to finance repairs and improve energy efficiency. All issues that we know can be barriers to people improving their homes to ensure they are safer and healthier, following our work on the [Good Home Inquiry in 2020-21](#). We [call this proposed service a Good Home Hub](#) and have been piloting this approach in Lincolnshire, as well co-ordinating a Good Home Network with a number of local authorities to share best practice.

7. What can the government do to support disabled tenants in the private rented sector?

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

The Equalities and Human Rights Commission found 93% of UK rentals are inaccessible to disabled tenants. Unsuitable housing has a significant impact on the physical and mental wellbeing of residents. Inaccessible homes also raise the risk that disabled tenants may not be able to live as independently, raising reliance on family and carers, and increasing the risk of avoidable accidents and hospital admissions.

Government must utilise the expertise of the housing and disability sectors – including consultation with disabled, chronically ill and older people – to examine ways to strengthen the rights and homes available for disabled tenants in the private rented sector.

While we welcome the proposed expansion of the Decent Homes Standard to cover the private rented sector, the standard is basic and does not include accessibility in a meaningful way.

While there were discussions on introducing accessibility into the DHS, it was limited to a requirement for landlords to support DFG applications – while we would support this, we believe that the exceptions proposed were too broad and would benefit from further guidance. As it stands the new standard makes no reference to disabled people's access to the reasonable adjustments they are entitled to under the Equality Act.

There may also be some scope to include some specific measures on accessibility in the upcoming Renters Reform Bill.

We recommend that all standards and policies that address fundamentals of housing include specific consideration to the needs of disabled and older people. We agree with the government's plan to introduce a legal duty on private landlords to ensure their property meets the Decent Homes Standard. We further recommend that the responsibility for accessibility is placed upon landlords rather than disabled residents.

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