

**Further written evidence submitted by the Royal College of Occupation Therapists Specialist
Section in Housing [DPH 044]**

Jacqueline Runnalls, Co-opted Lead in Accessibility and Inclusive Design, Royal College of Occupational Therapists (RCOT) Specialist Section in Housing gave evidence at the first session on 5th February but wishes to highlight additional, but important, considerations not discussed.

1. Lack of understanding of Building Regulations ADM

- Despite being introduced in 2015, there is still a complete lack of understanding and training for developers, designers/architects, LA Planners and Building Control, for M4(2) to some extent, but particularly M4(3) and its requirements, functionality, the difference between M4(3) adaptable and accessible. This is impacted by a lack of LA resourcing.
- As a Housing OT scrutinising planning applications speaking to Housing OT/access professional colleagues undertaking similar roles – everyone confirmed that virtually every M4(3) layout submitted since 2015 has been non-compliant. This is extremely concerning and demonstrates the need to employ relevant expertise to ensure homes are compliant and fit for purpose.
- Training needs to cover equality/diversity, an understanding of disabled peoples' housing requirements, and the need to adopt an inclusive, social model approach.
- M4(2) and M4(3) also require significant updating and re-writing to reduce misunderstandings, ambiguities, and provide critical missing detail (see No.4 below).

2. Requirement to employ access expertise/benefits of Housing Occupational Therapists

- As per No. 1, it is essential that there is a requirement to employ access expertise from design/pre-planning throughout the RIBA Plan of work process in line with RIBA's [Inclusive Design Overlay](#) – as would be standard for other aspects of new build housing development. By its omission it demonstrates the lack of understanding and commitment to ensure housing is fit for purpose, sustainable, accessible and adaptable housing, nor does it recognise the evidenced benefits demonstrated in the 2023 [BRE Cost of Poor Housing Report](#) with savings to the NHS of over £1 billion per annum, and £135.5 billion to society over the next 30 yrs.
- Housing O.T's employed within Local Authorities provide additional benefits and see the barriers created by poorly designed homes. They oversee the design and build of homes from pre-planning to post occupancy (working with/advocating for disabled people) to ensure designs are non-clinical/inclusive, accessible and adaptable homes that are fit for purpose and can provide significant resource savings. An example was a Housing OT post set up 10 yrs ago, partly funded using Section 106 monies, whereby 8

new wheelchair homes were so poorly designed that the council had to spend £25K per unit to adapt, using DFG monies that should have been spent elsewhere. This is further evidenced in London boroughs where several Housing OT's are employed and save significant monies (potentially millions - a document is currently being produced to evidence how) including specifying installed level access showers – the most common adaptation - under new M4(2) baths at a cost of approx. £500 at build, savings £7-8K + future adaptations costs per property. Providing advice on Major Refurbishment/Decent Homes also ensures products/designs are fit for purpose and do not create additional barriers e.g. height/type of window handles, door thresholds, bathroom/kitchens.

- Housing OT roles provide advocacy and support for disabled people in terms of the application and rehousing process itself e.g. housing assessment for waiting lists, assessing and adapting empty properties (including temporary accommodation/PRS), ensuring accessible properties are allocated and matched appropriately including difficulties accessing Choice Based lettings systems, overseeing Accessible Housing Registers etc. This provides an evidenced overview to assist in determining local need in relation to NPPF requirements.
- Whilst there are still relatively few Housing OT's across England (predominantly in London), the added value and savings provided by their role is becoming increasingly well-recognised.

3. Mandate the Nationally Described Space Standards (NDSS)

- The evidenced need to implement M4(2) and mandate for a % of M4(3) was discussed in first session, however it is also critical to mandate for the NDSS for general housing (2023 London Housing Design Standards recognise even these are limited and propose exceeding them). However there is also a need to provide space standards for M4(3) – this could also address consistent misunderstandings around their functional requirements (see 1. & 5).
- Space impacts significantly on the ability to provide homes which are accessible and adaptable, not just for disabled people with a physical impairment using mobility equipment but people with poor balance, who are neurodivergent etc.

4. Government to publish the ADM research cited in the 2021 Disability Strategy

- In the Disability Strategy 2021, Government committed to undertaking research into the prevalence and demographics in England and ergonomic requirements and experiences of disabled people and consider what updates are needed to statutory guidance. A question was asked in [Parliament in June 2023](#) whereby it was confirmed that this commitment has been fully implemented. In the [Government's Disability Action Plan 2023-2024](#) consultation document, it clearly states that they propose to publish this DLUHC commissioned research but we are still waiting. ADM is currently based on 25 yr old

research and only refers to physical impairment. This new research is critical to ensure ADM is up to date, considers a broad range of impairments, reflects society and ensures housing is fit for purpose.

- To update ADM Volume 1:Dwellings due to lack of detail, misunderstandings, ambiguities which further impact point 1. Above, but also the need to design inclusively and consider the wider population e.g. people with sensory and cognitive impairments, who are neurodivergent etc.

5. Marketing of new build wheelchair homes

- Where policies require new build wheelchair 'adaptable' housing i.e. not for social rent, there is an evidenced lack of understanding about the need to actively and positively market them – they are a much-needed resource, provide significant savings to society (£94,000 over 10 years as evidenced [by Habinteg/LSE research](#)), and can be designed to be inclusive and non-clinical with minimal, contemporary fixtures. Developers say they cannot sell/let them but when asked, have either not advertised them, advertised them inappropriately, or designs/space standards are so poor that they do not meet regulatory or functional requirements, cannot be adapted so cannot be occupied by a wheelchair user. There is an evidenced need for wheelchair housing across tenure ([400,000 wheelchair users unsuitably housed](#)) and [research](#) also shows that of the 1.8 million disabled people who need accessible homes, 39% have incomes in the top half of the income distribution
- Some London boroughs have tried to address this by introducing S.106 planning conditions requiring developers market wheelchair homes (non-social rent) for a period of 6 months and ensure advertising is appropriate in terms of content/relevance and mainstream advertising. This is usually in conjunction with the Housing OT.

6. Decent Homes standards Review

- The new standard should include consider essential building components which are critical for disabled people who require level access, such as Lifts, which are currently not included but could mean a disabled person is unable to leave their own home.
- The new standard should also ensure that when homes are brought up to a decent standard that they do not impact on accessibility and/or create additional barriers (see point 2. above)
- There is currently a panel of Social Housing disabled residents but should also be a panel for disabled residents of Private Rental in recognition that 23% of PRS fail to meet current standards compared to 10% of social housing.

To note;

Disabled Facilities Grants

The need to follow up on recommendations from the 2018 DFG Review and commitment's in the Government's previous 2021 Disability Strategy (upper limit of £30K, means test that doesn't take outgoing into account, allocation of funding) were discussed in the panel on 5th February – to signpost to 2022 Foundations [‘Housing Associations and Home Adaptations’](#) research which clearly sets out the current issues.

Jacquel is a Housing Occupational Therapist and inclusive design specialist currently working with LB Wandsworth's estate regeneration team overseeing the design and build of new accessible and adaptable homes and neighbourhoods. She sat on the Government's Technical Housing Standards review (which led to Part M Volume 1: dwellings), is a member of British Standards B/559 committee 'Design of an accessible and inclusive environment', a member of the Access Association, part of Homefinder UK/Habinteg's Accessible Now project (having been part of the Mayor of London's Accessible Housing Register project), works with Accessible PRS and the Centre for Accessible Environment and co-authored the 3rd Wheelchair Housing Design guide.

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