

Consultation response to Housing Standards Review – Technical Consultation

Ref 2414

Date: October 2014

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About this consultation

In August 2013, DCLG consulted on proposals to establish new optional standards for accessible housing, in addition to the core requirements of Part M of the Building Regulations. Age UK provided a detailed policy response to the consultation and argued for a universal rather than an optional approach to accessible housing standards. This consultation focuses on the specific technical aspects of the proposed optional 'category 2' standard, (based on the lifetime homes standard), and optional category 3 standard (based on Habinteg's Wheelchair Housing Design Guide) - but makes no changes to the core standard applied to all homes, Part M of the building regulations. Age UK has worked closely with Habinteg Housing Association and we support their expert technical feedback to the current consultation.

Key points and recommendations

- All new homes should be required to meet the lifetime homes standard.
- There could be long term social and economic costs associated with a failure to make further progress on accessible housing – especially in the context of an ageing population.
- Accessibility is important to ensure that older people can continue living independently and in their own homes for as long as possible.
- Basic home accessibility standards must be universal because it is often difficult to predict restricted mobility in later life. Older people should retain the option of 'staying put', whenever feasible.
- Optional standards, as suggested by Government, are open to challenge and could end up creating more red tape rather than less. This could potentially reduce the number of accessible homes rather than increase them.
- Adequate funding must be provided so accessibility issues in mainstream housing can be properly addressed.
- There is an urgent need for more wheelchair accessible housing. Local authorities should be required to define clear targets based on a local needs assessment and in consultation with disabled people and their families.

Introduction

There are currently 11 million people aged 65 or over in the UKⁱ. Population projections show that the proportion of people aged 65+ will rise from 17.7% currently to 23.5% by 2034ⁱⁱ. In addition, many more older people are likely to benefit from living to a much older age. The number of people over 85 in the UK is predicted to double in the next 20 years and will nearly treble in the next 30ⁱⁱⁱ. This means that more people are likely to experience a disability or restricted mobility as they get older - but will want to retain their independence, if possible. These trends demand a substantial reorientation of housing and care policies that go beyond the delivery of some additional retirement housing.

The majority of people do not anticipate having restricted mobility as they get older. They only discover at a late stage that their homes will prove difficult or expensive to adapt. A universal approach to accessible home design, that reduces unnecessary physical barriers, would overcome this problem and ensure everyone has more housing options.

The establishment of accessible home and wheelchair standards within the building regulations is a positive step forward. However, a universal approach to the 'category 2' lifetime homes standard is vital if we want to offer improvements in home design to future generations - who are likely to be predominately living in mainstream housing, not specialist housing.

The case for adopting the lifetime homes standard

The lifetime homes standard was designed to be a simple universal standard that would ensure an inclusive approach to the construction of all new homes. Incorporating the lifetime homes standard into Part M would be cheaper and more efficient than creating an optional accessibility standard. Local authorities who decide to promote the 'category 2 standard' will have to justify their decision and may find themselves open to challenge by home builders.

Having a single standard for accessible homes, as we have seen in London, creates a simple cost effective approach that benefits everyone. Over time, a universal standard, which all home builders are required to follow, would be more cost effective than an optional negotiated standard.

Short term cost and long term social and economic benefits

Age UK supports measures to increase the overall supply of new homes. We understand that the Government wants to reduce the complexity and cost associated with a multiplicity of standards for new developments. There is a small cost associated with the 'category 2' standard. The Government estimates that a three bedroom home built to the 'category 2' standard would cost only an extra £521. This cost is insignificant in comparison with the potential saving that would be achieved over the longer term. Introducing category 2 for all new homes would achieve a fair balance between the interests of home builders and those of ordinary consumers.

Wheelchair accessible housing

Age UK is concerned that there is insufficient wheelchair housing available for disabled people, many of whom will be in later life. It is helpful for the Government to set out a common standard for wheelchair housing and we support the technical feedback provided by Habinteg. However, we would like to see more pressure on local authorities to establish clear targets for affordable homes across both the private and social sector that are fully wheelchair compatible or wheelchair accessible. We believe the correct balance between these requirements will depend on local assessments of need and engagement with disabled people themselves to agree the best way forward. We are concerned that in some places there are long waiting lists for suitable affordable homes and only limited choices available.

Cost of inaccessible housing

Poorly designed homes are generally more difficult and expensive to adapt for people with restricted mobility. Increasing numbers of older people struggle to obtain home adaptations or experience a long wait before they obtain assistance. Those unable to obtain adaptations are more likely to experience falls or accidents in the home. This in turn leads to an increased demand on social care and hospital beds. The combined cost of hospitalisation and social care for hip fractures (most of which are caused by falls) is approaching £2 billion a year^{iv}.

The Government has recently announced additional funding for care at home as part of its Better Care Fund. But inaccessible housing conditions will, in many cases, undermine home care objectives and not achieve the desired savings.

The lack of an accessible home environment means older people often stay longer in hospital. Those unable to make the necessary improvements may be pushed into residential care or specialist housing against their wishes. The average cost of home adaptation allowing an older person to remain at home is £6,000, compared with the yearly cost of £26,000 for residential care – therefore representing a substantial saving. If all homes were made easier to adapt by implementing the ‘category 2’ standard, the cost could be reduced even further.

The ‘category 2’ standard provides a cheap and effective way to reduce the costs to the health and social care system, and would improve the quality of life of millions of people, including older people, anyone with a disability and families with small children.

Care and support within the family home

Family carers play a vital role in supporting older relatives at home. As part of this the Government has encouraged adding extensions and annexes to the family home, to allow families to offer housing and care for older relatives.

The Government’s approach implies that mainstream family housing should be accessible to older people who may need care. Although Part M of the building regulations has made progress towards this objective, the Government needs to improve universal standards if it wants more families to be in a position to offer care.

Predicting housing needs

The Government has said that it will require local authorities to demonstrate the viability of ‘category 2’ homes in their area. Such a viability test should not just focus on the short term returns for developers, but also take account of the long term social and economic benefits for society. The contribution of better home design and improved standards to the health and wellbeing of occupants, should be a fundamental aspect of the Government’s housing strategy.

The consultation paper suggests that local authorities are in a position to accurately predict the extent of mobility restrictions as the population ages. Even where this is possible, it implies that if someone has a mobility issue they should then move into a specialist form of housing complying with the ‘category 2’ standard. Many older

people would reject the notion of moving out of their home as the result of restricted mobility.

Most older people live in mainstream housing, a trend that is likely to continue. The majority of older people want the ability to continue living in their own home. Many others seeking to downsize will also be looking for smaller but more manageable, mainstream housing. We believe that having a modest improvement in accessibility standards across the board, i.e. 'category 2' being universally implemented - would significantly improve the housing options available to everyone as they get older.

ⁱ Mid-2013 Population Estimates UK Office for National Statistics, 2014

ⁱⁱ National population projections, 2012-based, Office for National Statistics, 2013

ⁱⁱⁱ National population projections, 2012-based, Office for National Statistics, 2013

^{iv} British Orthopaedic Association (2011). The National Hip Fracture Database National Report 2011. BOA\BGS. Available online at: http://www.nhfd.co.uk/003/hipfracturer.nsf/NHFDNationalReport2011_Final.pdf