Manchester Disabled People's Access Group

Address: 13 Westholme Road, Withington
Manchester M20 3QZ **Tel:** 07764 603322
Email: flickh@mdpag.org.uk **Web:** mdpag.org.uk
Email: katie@mdpag.org.uk

Briefing Note for Greater Manchester Local Authorities developing Local Plans

Wheelchair Accessible Housing: Building Regulation M4(3)

Introduction

This briefing note, which has been prepared by Manchester Disabled People's Access Group, outlines the issues related to increasing the provision of new homes for wheelchair users in Greater Manchester.

It proposes that Local Plans in Greater Manchester should include a requirement to build 10% of new private and social housing developments to Building Regulation M4(3) wheelchair-accessible standard. This will help to address the current shortage of wheelchair-accessible homes in each Local Authority.

It should be noted that within the M4(3) standard two sub-categories are available to specify:

• M4(3)a: wheelchair adaptable (meaning that they meet spatial and layout requirements but may not have been fully fitted and finished to accommodate immediate use by a wheelchair user)

• M4(3)b: wheelchair accessible (meaning that the dwelling is fully ready for occupation by a wheelchair user household).

In the response to its consultation on accessible homes the previous Government announced that (the policy) for M4(3) (Category 3: Wheelchair user dwellings) would continue 'as now **where there is a local planning policy in place in which a need has been identified and evidenced.** Local authorities

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will need to continue to tailor the supply of wheelchair user dwellings to local demand'[1].

In 2020, Habinteg calculated that local plans in the North West as a whole (draft and adopted) would deliver just 1.5% of new homes to M4(3)[2]

This note is intended to give campaigners, local councillors and local planning and housing authorities in Greater Manchester the context to this issue from the perspective of disabled and older people's organisations. The note also identifies sources of evidence to demonstrate the need for wheelchair accessible housing.

It should be noted that disabled people who require wheelchair accessible housing may live with multiple impairments.

1. Planning Background

1.1 The Liverpool Plan[3] and the London Plan both include a requirement for at least 10% of **all** new homes to be designed to the M4(3) standard.

1.2 In March 2019 the Royal Town Planning Institute stated[4] in its response to the Greater Manchester Spatial Framework that

'The requirement to adhere to M4(2) Category 2: Accessible and adaptable dwellings in the Building Regulations 2010, Access to and use of Buildings Approved Document is welcomed.

However, the policy could be improved further by adding a reference to a requirement to adhere to Category ADM4(3), wheelchair accessible housing, subject to specific site

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conditions making this impracticable. It would be the role of local plans to assess the level of requirement for these standards in their local area where other relevant factors could be considered including the impact on project viability.'

1.3 Places for Everyone (Greater Manchester's Plan to 2039) requires all new housing developments to be to Building Regulation M4(2) 'accessible, adaptable' standard. However, the Plan contains **no** reference to the provision of M4(3) 'wheelchair accessible' housing. GMCA felt that it was for individual local planning authorities to determine the requirement for wheelchair-accessible housing in their Local Plans.

1.4 Giving evidence at the Places for Everyone Examination (2023) MDPAG acknowledged that GMCA could not **impose** a requirement to include a policy on M4(3) on GM Local Authorities. However, they asked that the Plan incorporate a requirement to use 'best endeavours' to encourage GM Local Authorities to include such a policy, which the RTPI had suggested would improve the Plan policy.

1.5 MDPAG felt that the M4(3) policy should apply not just to the social housing account but to both social **and** private housing, as some wheelchair users prefer to (and are able to) buy a home. In addition, a home-owner may become a wheelchair user through an accident or ill-health and is likely to prefer to purchase a home.

1.6 At the Examination MDPAG suggested that it would be appropriate for GMCA, rather than individual Local Authorities, to carry out the necessary research – across the Combined

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Authority – to establish the need for M4(3) housing. They were supported in this by the Home Builders Federation representative.

2. Evidence of Need

2.1 The Big Disability Survey 2022[5] which was carried out by GM Coalition of Disabled People's Panel (GMCDPP) highlighted that there is a significant shortage of wheelchair accessible homes in Greater Manchester. The Survey described the impact this has on the health and wellbeing of wheelchair users. GMCDPP asked the ten GM Local Authority planning committees 'to ensure that all new homes are built to Building Regulation M4(2) accessible' standard, with 10% built to M4(3) wheelchair-accessible standard.'

2.2 GMCP, MDPAG and Breakthough-UK know of wheelchair users who have been offered employment in Greater Manchester but were unable to take up positions because there are no suitably accessible houses or flats. We also know of wheelchair-users who had to move to a different Local Authority area in GM to obtain suitable accommodation as their needs changed, leaving their family and community support networks.

2.3 Young people regularly comment at meetings of GMCDP and MDPAG that they are unable to leave the family home to live independently because of the lack of wheelchair accessible accommodation.

2.4 The State of Ageing in Greater Manchester report[6] confirms that the population of Greater Manchester is ageing. Increasing age may bring mobility impairments. We should plan our future

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housing stock to accommodate an increase in wheelchair users.

2.5 Older people and people coming out of hospital after accidents and health issues may require additional support at home. The impact of people leaving hospital care to inaccessible accommodation may lead to the need for additional rehabilitation and home care staff, and delays in releasing beds for incoming patients.

2.6 Press reports suggest that many people suffering Long Covid became wheelchair users. The potential long-term impact of Long Covid and regular occurrences of new versions of Covid is not quantifiable but should be planned for.

2.7 It is accepted that 80% of the homes we will be living in in 2050 have already been built, so we need to use every possible opportunity to ensure that new housing increases the availability of more accessible homes. The 10% target set in London and Liverpool was done so in recognition of the dire need to 'catch up' given that the majority of UK homes were built well before accessibility considerations were a factor.

2.8 A policy that requires 10% of all new housing in each Local Authority in Greater Manchester to be built to M4(3) standard would give developers a level playing field - which they prefer – and avoid confusion.

3. Further sources of Evidence

3.1 An ageing population (2011 Census): Those aged 60-64 in GM are projected to account for 6% of the population by

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2036, as opposed to 5% in 2016. 65–74year-olds are projected to account for 11% of the population in 2036, an increase from 9% in 2016. Those aged 75-84 are projected to account for over 7% of the population in 2036, and those aged over 85 are set to account for 3.5%, as opposed to 2% in 2016.

The greatest rate of population change between 2016 and 2036 is projected to be in the older age groups, with those aged over 85 increasing by 79% over the period. There will also be strong growth in all age groups over 60.

3.2 Long-term Health Problem or Disability (GM Strategic Housing Market Assessment, 2019):

The 2011 Census defines a long-term health problem or disability (LTHPD) as: (a condition) that limits a person's day-to-day activities and has lasted, or is expected to last, at least 12 months. This includes problems that are related to old age. The Census asked people to assess whether their daily activities were limited a lot or a little by such a health problem, or whether their daily activities were not limited at all.

Greater Manchester has a greater share of people with a LTHPD than England as a whole. By 2035, 30% of those aged over 65 in Greater Manchester will have a limiting long-term illness that limits their day-to-day activities a lot (higher than the national average of 25.3%).

People in the oldest age bands are more likely to have a LTHPD. Therefore, a growing older population can be expected to result in growing numbers of people with a disability.

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In Greater Manchester, the percentage of the population aged 65 and over in 2035 with a LTHPD, whose day-to-day activities are limited a lot, is estimated to be 29.9% (185,661) compared with 25.3% (3,656,935) in the UK as a whole.

In 2016 3.5% of all heads of households in Greater Manchester were aged over 85 and 8.8% were aged between 75 and 84. By 2036 this is expected to rise to 5.6% for those aged over 85 and 11.5% for those aged 75 to 84.

The SHMA found that there will be higher levels of disability and health problems amongst older people and therefore there will be an increased requirement for specialist housing options moving forward.

3.3 Personal Independence Payment (PIP):

In July 2022, 161,056 people in Greater Manchester were entitled to PIP. (dwp.gov.uk, Stat-Xplore-Home)

3.4 Disabled Living Allowance (DLA):

In February 2022, 71,188 people in Greater Manchester were entitled to DLA. (dwp.gov.uk, Stat-Xplore-Home)

3.5. Numbers of disabled adults / children on GM housing lists who require wheelchair-accessible accommodation:

This data does not appear to be collected. The closest dataset is 'People who need to move on medical or welfare grounds, including grounds relating to a disability'. The GM total is 7,679. (Local Authority Housing Statistics dataset 2020 – 21, GOV.UK),

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In 2020, Habinteg calculated[7] (from English Housing Survey accessible housing data) that 57% of wheelchair users nationally are living in accessible or 'adapted' homes. This means that 43% were not.

3.6 NHS and Social Care: Information from NHS and Social Care trusts suggests that there are delays in discharging people from hospital due to the lack of accessibility in existing homes, including not only handrails but also major adaptations such as accessible showers and toilets, accessible kitchens, stairlifts, level access to entrances and exits and accessible parking at existing accommodation.

3.7 Disabled Facilities Grant (DFG): The limitations of the DFG and the lack of staff in local authorities are leading to delays in people getting assessments for small and major adaptations to existing housing. GMCDP and MDPAG receive regular requests for assistance in getting accessible toilet and washing facilities including delays of more than 2 years leading to the inability to wash and toilet independently.

4. Costs

4.1 A report by Habinteg / LSE: 'Living not Existing' (2023)[8] revealed that the typical additional cost of building a wheelchair user home – instead of an accessible & adaptable home - for a disabled adult of working age is around £22,000, with the potential ten-year financial and social benefit to the individual and the public purse being around £94,000.

For a household with a child who is a wheelchair user the additional cost is around £26,000 to build a new wheelchair

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user home. The ten-year economic and social benefit is around £66,000.

For a typical older wheelchair user house-hold the additional cost to build a new wheelchair user home is around £26,000. The ten-year financial and social benefit is around £101,000.

The positive impact on the public purse for each household type benefits both national and local bodies. Local Authority savings amount to around £1,700 per year for a household with a disabled child; £4,800 for a household of working age; and £9,200 for a later years' household. The NHS also benefits by hundreds of pounds, per household, per year.

Meanwhile, benefits to government through tax, national insurance and a reduced welfare spend is £700 for a household with a disabled child, and £2,400 for a working age adult household.

More detailed information is available in the report.

5. Benefits

5.1 Better access to employment for disabled people. In 2016, Habinteg/LSE calculated[9] that disabled people of working age whose access needs at home are met are four times more likely to be in employment.

5.2 Reduced costs to the NHS as a consequence of shorter discharge times for wheelchair users.

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5.3 Reduced requirement for Social Care due to greater independence of wheelchair users.

5.4 Reduced costs of future adaptations.

5.5 More inclusive communities. Keeping older and / or disabled people in their own homes, in their own communities, with existing support networks (rather than moving to specialist accommodation) improves their wellbeing and supports Age Friendly strategies. Maintaining social and family relationships enables people to get out and about better.

6. Conclusion

Including a requirement to build 10% of all new homes to the M4(3) standard in Local Plans will increase the stock of accessible homes within the Greater Manchester area over time.

This will bring benefits to the health and welfare of wheelchair users and will plan for an ageing population.

It is likely also to result in reduced social care costs and costs to the NHS.

7. References

[1]'Raising accessibility standards for new homes: summary of consultation responses and government response' (GOV.UK, 29 July 2022, para.74).

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[2]Habinteg Housing Association Annual Report and Financial Statements, 2020

[3]The Liverpool Local Plan (2013 – 2033) states 'The City Council will also apply Part M4 (3) Part (2) (a) of Building Regulations to 10% of all new homes in a development. To meet this requirement the provision made must be sufficient to allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs.' (page 153).

[4]RTPI response to the GM Spatial Framework, Policy GM-H 3: Type, Size and Design of New Housing (March 2019).

[5] The Big Disability Survey (2022).

[6] The State of Ageing in Greater Manchester (January 2024)

[7]New government data reveals accessible homes crisis for disabled people | Latest news | Habinteg Housing Association

[8] 'Living not Existing' (Habinteg / LSE, 2023)

[9] The Hidden housing market | Habinteg Housing Association/LSE, 2016

For further information please contact:

Flick Harris, Chair, Manchester Disabled People's Access Group (MDPAG) (flickh@mdpag.org.uk)

or

Joan Rutherford, member of MDPAG and Chair of the National Network of Older People's Housing Champions (joan.crystall@btinternet.com)

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