The Access Association

www.accessassociation.co.uk

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Please reply to:
Email: president@accessassociation.co.uk

**Ministry of Housing, Communities and Local Government**

FAO The Rt Hon Steve Reed OBE MP

steve.reed.mp@parliament.uk
correspondence@communities.gov.uk

Via email

Dear Mr. Reed,

## Consultation of the National Planning Policy Framework

We are writing to express our surprise and disappointment at an aspect of your government's current consultation on the National Planning Policy Framework. Our concern is specific to the proposals tabled in relation to applying requirement M4 (2) of the Building Regulations to just 40% of new build housing.

The Access Association is a membership Association for professionals involved in accessibility of the built environment. The association's membership includes professionals involved in the adaptation of existing housing stock to meet the needs of disabled and older people, as well as people who have need for such adaptation first hand and have seen how unnecessarily difficult and expensive it can be to adapt new homes that are not built to M4 (2).

Following a full public consultation, the previous government announced their policy intention was to require M4 (2) on all new homes, with minor exception in specific circumstances. This was in July 2022. Finally, after many years, the government of the day was forward thinking enough to recognise that this overdue shift in the basic standards for new build housing was in the national interest. The consistent approach proposed, using the building regulations, would take the onus off overstretched local planning authorities and provide the certainty needed for industry to progress with building the right standard of houses needed. For our members, this was seen as a vital step in securing homes that are more easily adaptable for disabled people and our ageing population.

We are therefore disappointed that your government is now consulting on an unambitious watered-down version of the previous government's policy. The previous government's consultation had overwhelming support to raise standards and was summarised as follows:

> "Question 3: Do you support the Government's intention to raise accessibility standards of new homes?
> 21. Of those that responded to this question (412 respondents), an overwhelming number (98%) supported government's intention to raise accessibility standards of new homes.
> 22. Comments from respondents highlighted the wider impact raising accessibility standards of new homes would have. This included the reduction in reliance on the NHS and social services, paid and family carers and helping to support disabled people to work, socialise and contribute to society as fully as possible.
> 23. Respondents also commented that raising accessibility standards would 'future proof' new homes for successive generations, saving costs associated with adapting homes.
> 24. There were some comments that raised the concern about the viability of building new homes to higher standards, which respondents suggested should be driven by evidence of local evidence and demand."

When making their decision to proceed with all new homes needing to meet the M4 (2) requirement, the previous government confirmed that:

> "Total benefits (to business and society) are estimated to exceed total costs under the central and high estimates, however under the low estimate (which excludes sales price benefits) they do not. The Net Present Social Value (the present value of all future cash flows, over 70 years) ranges from -£4,661m up to £1,930m (2022 prices). Figures calculating societal costs include the running costs of M4(2) homes that accrue to residents. Societal benefits include the health and non-health benefits of the policy."

This approach had widespread support. For many of our members, disabled people and stakeholders around the country this announcement was a reason to celebrate and warmly welcomed.

The consultation which led to the announcement in 2022 was not the only mechanism that concluded 100% to M4 (2) was the right approach. There have been several reports and committees which have implored the government to implement the proposal to require 100% of new builds to meet M4 (2) including the Select Committee reports 'Disabled people in the housing sector'[1] in 2024 and the 'Older People's Housing Taskforce Report' [2] recommended:

> "Immediately implementing the adoption of Part M4(2) of the Building Regulations for all new housing. Also, in the medium term, adopt guidance on the provision of wheelchair accessible dwellings under Part M4(3) of Building Regulations to ensure

[1] Disabled people in the housing sector

[2] The Older People's Housing Taskforce Report - GOV.UK

> that such dwellings are provided as appropriate and that full occupation by those for whom they are intended can be reasonably ensured."

Before this, in 2017, the House of Commons Women and Equalities Committee, which included several of your party's members such as Jess Phillips, Tracey Brabin and other labour politicians wrote in their report titled "Building for Equality: Disability and the Built Environment" that:

> "121.The evidence to us is clear that the minimum standard set in Approved Document M4(1) is simply too low to meet the needs of the population, and should be retained only for those properties where the higher standards would demonstrably make development unviable. While we recognise that there are additional costs involved, those resulting from meeting M4(2) make up only a fraction of the cost of building a new home.
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> 122.We recommend that the Government amend the default minimum baseline standard for all new homes under Part M of the Building Regulations (vol. 1) to Category 2 (M4(2)). We accept that there may be a need for exceptions to this policy, but the minimum of 'visitability' under M4(1) should only be available where an applicant for planning permission can prove that it would not be feasible to meet the new minimum standard."

Given the overwhelming response to the previous government's consultation specifically on adopting M4 (2) requirements being in favour of 100% to M4 (2), the recommendations of the 'Disabled people in the housing sector report', the 'Older People's Taskforce' and the 'Women and Equalities Committee', we ask why the current Labour government has put forward such an unambitious proposal of 40%? And why via the NPPF rather than via the Building Regulations as was previously intended?

Our membership very strongly recommends you consider implementing the more ambitious 100% to M4 (2) policy, as was announced by the previous government. Anything less risks building more homes which later require retrofit and excessive adaption to meet the needs of our ageing population.

We await your response with anticipation.

Yours sincerely,



**Fausto Pereira**

Access Association President
Email president@accessassociation.co.uk
Web www.accessassociation.co.uk