

18 December 2015

Dear Minister,

P-04-623 Improve the Provision of Disabled Friendly housing in Wales

Thank you for your ongoing correspondence on the importance of disabled-friendly homes with the Petitions Committee Chair, William Powell AM.

As we outlined in our letter to William of 16 September, we are very happy to work with you on this important issue in order to set out the clear case for building homes in Wales to wheelchair accessible and Lifetime Homes standards. Please accept our apologies that this letter reaches you after a lengthy delay.

In this letter we will outline:

- The importance of disabled-friendly homes;
- The economic benefit of providing such homes;
- Local authorities' failure to use the current building regulations flexibility to deliver enough disabled-friendly homes in Wales; and
- The need for additional data collection in this area to fully scope the challenges posed by the current lack of disabled-friendly homes.

The importance of disabled-friendly homes

Over 250,000 adults in Wales have a mobility impairment¹ - more than 10% of all adults in the country. But Welsh housing is not currently meeting their needs:²

- Almost three quarters (72%) of people in Wales report that they live in a home without an accessible front door
- Seven in ten (70%) people in Wales report they do not have environmental controls (like light switches) which can be accessed from a sitting position;
- Three in five (60%) people in Wales report they do not have a bathroom big enough for a wheelchair to fit in.

We have included the full findings of our poll at Annex A, for your consideration.

When people's homes do not meet their most basic needs, they are often denied the ability to live independently, to contribute economically, or to participate fully in society. Families with disabled children, like Ruby and Cody below, also end up trapped - unable to plan for the future or forced to rely on expensive and inflexible support from the local authority, which a disabled-friendly home would render unnecessary.

Ruby and Cody

¹ ComRes interviewed 2,006 GB adults aged 18+ online between the 4 and 6 June 2014; including 109 from Wales. 11.8% of the sample self-identified as having a mobility impairment. Data were weighted to be representative of all GB adults aged 18+. Extrapolation was based on the Census 2011 data (2,345,208 people aged 18+ in Wales)

² ComRes interviewed 2,006 GB adults aged 18+ online between the 4 and 6 June 2014. Data were weighted to be representative of all GB adults aged 18+. Welsh sample size: 108

Ruby lives in Barry in South Wales with her son Cody, who has the degenerative muscle condition Duchenne muscular dystrophy. Cody currently finds it difficult getting up the stairs on his own, and this will only get worse as time goes on and his illness progresses.

Ruby told us that: “I’m very worried about what will happen if we have to stay here once Cody has to use a wheelchair. He won’t be able to sleep in his bedroom, or use the bathroom privately, and the impact on his life, our lives, will be enormous.

“There are new developments being built in Barry, but neither the council nor private developers are building enough homes to cater for families like us who need them. We are gold priority on the Homes 4U list (the local housing association), but there’s not a single available home in the area which is suitable.

“The life expectancy for someone living with Duchenne is only 27 years. Our precious time together shouldn’t be wasted struggling to get out of the front door, or get down the stairs, we should be able to enjoy our lives together while we can.”

That is why we are calling for all new homes in Wales to be built to Lifetime Homes standards.³ Lifetime Homes are ordinary houses and flats which incorporate 16 design criteria that can be applied to new homes with a total average cost of £1,100.⁴

These standards save money in the long run, by ensuring that things like grab-bars and stair-lifts can be easily and cheaply installed if people’s needs change.

Lifetime Homes work for a broad range of people - from disabled people who need more space to move around, to older people who need grab bars to help them get around the home safely, to families with young children who need to fit prams and pushchairs through the front door. These are not just homes for disabled people - they work for everyone.

We are also calling for 10% of new homes to be built to wheelchair accessible standards. While only 2% of the population rely on the use of a wheelchair,⁵ it is necessary to build a greater proportion of wheelchair accessible homes for two reasons:

- There is currently an acute shortage of wheelchair accessible homes.

In 2010, Habinteg estimated that there was a shortage of 78,000 wheelchair accessible homes in England based on analysis of the Survey of English Housing 2007/08, around 240 per local authority.⁶ Unfortunately, there is not an equivalent survey in Wales, though there seems little reason to expect the demand in Wales to be substantially lower.

³ Lifetime Homes standard were developed by Habinteg and the Joseph Rowntree Foundation, details are available here: <http://www.lifetimehomes.org.uk/pages/about-us.html>

⁴ Estimates vary. The CLG Housing Standards Review Consultation Impact Assessment estimated the average cost as £1,100. A previous CLG estimate put the average cost at £547. DCLG The Future of the Code for Sustainable Homes, 2007.

⁵ NHS purchasing and supply agency 2000

⁶ Mind the Step: An estimation of housing need among wheelchair users in England, Habinteg, London South Bank University (2010)

The data we do have supports this conclusion further, however. In Wales, 22% of disabled households were waiting for an adaptation to be made to their home in 2008.⁷

- It is vital that wheelchair users have some choice in where they live

Even once the backlog of demand for wheelchair accessible homes is cleared, it will not be enough to match the number of wheelchair users in Wales exactly with the number of wheelchair accessible homes.

People need, or choose, to move for any number of reasons: for work, to live closer to family, to downsize their home as their needs change, to move to another part of the country, and wheelchair users are no different. In order for the supply of homes in Wales to meet the needs of its wheelchair user population, significantly more than 2% of all homes in Wales will need to be wheelchair accessible.

As such, it is our view that the Welsh Government should commit to building 10% of new homes to wheelchair accessible standards at least over the course of the next National Assembly for Wales term.

The economic benefit of providing disabled-friendly homes

We recently worked with Landman Economics to estimate the overall costs to the public purse of the lack of accessible housing in Wales and the potential fiscal benefits from building all homes to Lifetime Homes standards and carrying out all the necessary adaptations to those homes to allow disabled people to live independently.

The report concluded that the lack of accessible homes in Wales imposes costs on the Exchequer due to increased NHS and social care expenditure. It modelled four categories of costs to the public purse:

- NHS costs for people suffering injuries or depression-related conditions as a result of living in inaccessible housing (including hip fractures and other injuries resulting from falls, ambulance call-outs, treatment for depression, bed blocking and GP appointments);
- Additional local authority expenditure on residential social care system resulting from individuals with care needs having to move into residential social care because their own home is not sufficiently adapted for them to receive domiciliary care;
- Reduced receipts of taxes and National Insurance Contributions for people forced out of work due to health problems arising as a result of inaccessible housing; and
- Increased expenditure on disability and unemployment-related benefits for people forced out of work due to health problems sustained due to inaccessible housing.

The results show that each newbuild home built to the Lifetime Homes standards, and adapted to suit disabled occupants, saves the Exchequer an average of £122.

Over a 50-year period the Net Present Value to the public finances of a newbuild home built to Lifetime Homes standard and adapted to suit the needs of its disabled tenants is £98m annually for Wales alone. The report, including detailed methodology and statistical findings, is included at Annex B.

⁷ The Living in Wales Survey, 2008

How many local authorities are currently choosing to invest in Lifetime Homes standards?

Our analysis of the current disabled-friendly housing provision in Wales indicates that local authorities are not currently investing in the disabled-friendly homes that Welsh people need.

Freedom of Information requests sent to all Welsh housing authorities revealed that:⁸

- Only one Welsh local authority - Denbighshire - told us that they have a policy to build any new homes to Lifetime Homes standards;
- A third (36%) of Welsh councils either do not have a housing plan, or their plan makes no reference to disability at all;
- No Welsh councils have analysed the additional costs of inadequate housing to the health and social care systems;
- Only half (55%) of Welsh local councils have an Accessible Housing Register or similar system;
- Only five Welsh local authorities - Bridgend, Cardiff, Conwy, Newport and Swansea - were able to tell us how many disabled people were on their housing waiting lists; and
- Between them, those five local authorities had over 2200 disabled people waiting for a home in their area. If the rest of Wales had the same proportion of disabled people on their housing waiting list, we would expect there to be more than 7000 disabled people waiting for a home across Wales. If, as seems likely, those local authorities who could not tell us how many disabled people were on their housing waiting list have a greater than average proportion of disabled people on their lists, the number would be even higher.

The evidence is clear that local authorities are not currently taking the steps necessary to deliver the disabled-friendly homes that people living in Wales need.

In our discussions with local authorities, many reported that they felt unable to implement Lifetime Homes standards on an individual basis - fearing that developers would simply choose to move their planned developments across the border and their constituents would miss out on new build homes. The Welsh Local Government Association said that local authorities in Wales would likely support the introduction of Lifetime Home standards across the whole of Wales and are looking to the Welsh Government to issue clear direction and guidance on this important issue.

The benefit of legislating for a countrywide uptake of Lifetime Homes standards is that developers' opportunity to relocate will be dramatically curtailed. Other areas - including the Greater London Authority and the Scottish Government⁹ - have not suffered a reduction in the number of homes built as a result of embracing disabled-friendly building standards in recent years.

Accessible housing data

One of the problems we have faced in truly getting to grips with the scale of the problem caused by the lack of disabled-friendly homes in Wales has been the lack of available data.

⁸ We sent FOI requests to all Welsh local authorities in August 2014, and received at least a partial response from 19 local authorities

⁹ The Scottish Government brought in new building standards in 2007 which adopted 14 of the 16 standards of Lifetime Homes – the only standards which were not adopted related to the installation of tracking hoists and through-floor lifts

It is our view that without effective scrutiny, thousands of disabled people will be left stuck sleeping in their lounge, washing at the kitchen sink and unable to go upstairs to kiss their kids goodnight for many years to come.

In order to ensure that disabled people get the support they need to live independently, the following data should be collected and published annually by the Welsh Government:

- The number of disabled people on housing registers across Wales;
- The proportion of wheelchair accessible social and private homes across Wales;
- The proportion of new homes built to Lifetime Homes standards across Wales;
- The average wait for adaptations for Welsh homes;
- How many Welsh homes are 'visitible', i.e. how many have level access; a flush threshold; a sufficiently wide door and circulation space to move around; and use of a WC on the ground or entry floor; and
- The unmet demand across Wales for wheelchair accessible housing.

It is our view that this additional data collection would allow the Welsh Government to measure - and tackle - the unmet need for disabled-friendly homes in Wales, and the ongoing cost to the Welsh economy of that unmet need.

We would be very grateful for the opportunity to meet with you to discuss these matters further - particularly in light of our recent economic findings. We are very keen to work with you on this matter to ensure that disabled people have access to homes that work for them, and allow them to live their lives to the full.

Yours sincerely,

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Policy and Public Affairs Officer (Wales)

Cc'd: William Powell AM, Chair of the Petition's Committee,
Minister for Communities and Tackling Poverty,
Ceri Breeze, Head of Housing Policy/Deputy Director