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Dear Anna

Thank you for your letter.

We fully appreciate and understand your calls for increased accessibility standards and the reasoning for so doing. However, we believe it needs to be recognised that this is one of a broad range of pressures being placed on developments all of which it would simply be impossible to support.

Due to changes to Part M of the Building Regulations over recent years, new homes are already more accessible than those built previously and have a range of features that make them both more accessible and also adaptable for future accessible living.

Our members build a range of house sizes and types to cater for all sections of the market, including an increasing proportion of the first-time buyer market. However, we know that not all new home buyers want to purchase a home that has all the features required to reach the higher accessible standards. Young people in particular want homes that are built for modern living and with design features and space allocations that enable them to best live their early adult life and, in many cases, bring up young families. On average they will stay in their first home for around five years before staircasing up. Housebuilders spend a huge amount of time undertaking consumer research and design their house types accordingly. As a private sector market led industry, house builders ensure they are building what their customers want.

HBF's role is to represent our members interests. As such we make representations at every Local Plan inquiry to try and ensure that Local Authorities are planning for the number of homes their communities require in a way that makes it possible for the industry to actually deliver them.

HOME BUILDERS FEDERATION

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In recent years we have seen an increasing reliance on house building sites to cross subsidise a wide range of social requirements that were previously paid for out of general taxation. Last year contributions from the private sector house building industry towards local infrastructure and amenities and affordable housing totalled over £6Bn, and private developments now provide around 50% of all our affordable housing.

We are also seeing calls from various groups for the industry to go further with regards to energy efficiency, space standards, provision and upkeep of open space and a range of other changes to design and specification of the house and development. All of these are of course extremely worthy in their own right, but there is a limit to how many additional 'asks' a development will support before it becomes simply unviable to develop.

It is indeed cheaper to undertake the work to improve accessibility at construction stage, but there is still a cost. And that cost must be balanced against all the others being levied on developments. While each individual element might be considered to be "small" or affordable, the cumulative costs can be considerable and must be considered as a whole rather than in isolation.

As you will be aware Government considered the issue of accessibility as part of a wider review of housing standards in 2015. At that point it could have decided to make it a requirement for all new homes to achieve higher access requirements and implemented that via Part M of the Building Regulations.

However, after a thorough review (in which many of your organisations were involved, making similar points regarding accessible homes) the Government concluded that it did not want to impose a national requirement beyond Part M(1) but rather determine additional accessibility levels for new dwellings at a local level via the Local Plan process. As you are aware, as part of that process the Local Authority can specify what percentage of accessible homes it would like the industry to deliver but is required to provide evidence to support its request. If it undertakes the requisite work and provides an evidence base justifying their policy requirement then the Planning Inspector at the local plan inquiry will accept the policy within the context of the local plan.

Our representations therefore, do not object to increased accessibility standards in themselves. Rather they look to ensure that the Local Authority has carried out the obligations placed upon it by the planning system across the range of issues covered by the local plan process and that is not simply trying to place a range of demands on developments without the supporting evidence of the need and impact of policy requirements on viability and deliverability of development overall.

Our role aims to help ensure that policies adopted at local plan inquiries are, in their totality, realistic and enable viable sites to come forward such that we can continue to increase housing output and tackle our acute housing crisis.

Convincing Government to consider implementing increased levels of accessible housing as a requirement on a national level; or pushing local authorities such that they abide by the responsibilities placed on them by the planning system by

undertaking the work to demonstrate the level of increased accessibility need specifically in their areas, and adjust their other policy requirements such that sites are viable, could be approaches that would lead to more certainty over future such provision.

We would welcome a discussion on all these issues and to consider how our industry can provide even more accessible homes, as part of our drive to increase housing provision overall.

Kind regards

A handwritten signature in black ink that reads "S.A. Baseley". The signature is written in a cursive style with a long horizontal flourish underneath the name.

Stewart Baseley
Executive Chairman

