



Greater London Authority

Draft New London Plan

Habinteg written response

02 March 2018

1. Introduction

- 1.1 Habinteg is a housing provider with more than 40 years' experience of providing inclusive and accessible homes and services. As a national housing association, we have 3,337 properties across the UK, including over 500 properties in London.
- 1.2 We developed the [Lifetime Homes Standard](#) (in collaboration with others) and the Habinteg [Wheelchair Housing Design Guide](#) and advocate the optional access standards (Building Regulations Approved Document M4 Categories 2 and 3) now that they are in place. Our specialist technical team, [the Centre for Accessible Environments](#), conduct research, consultancy and training around access and inclusion with a wide range of partner organisations.
- 1.3 As an accessible housing provider, we understand the importance of learning from the experiences and requirements of our tenants. We campaign for inclusion and awareness and encourage positive representation of disabled people using the social model of disability.
- 1.4 We want communities to include disabled people, offering places to live that meet their needs and provide the highest levels of independence, choice and control over their daily lives.

Policy D3 Inclusive Design

We support the Draft New London Plan's commitment to inclusive design, which aims to ensure that a variety of needs are included in design and development from the offset. We are pleased that **section 3.3.1** acknowledges that "inclusive design is fundamental to improving the quality of life for disabled and older people in particular", as this understanding is integral to ensuring that policies are designed with older and disabled people in mind.

Section 3.3.2 states:

"Inclusive design creates spaces and places where people can lead more interconnected lives, **creating more inclusive communities**. Links to the wider neighbourhood for all pedestrians should be carefully considered, including networks of navigable safe pedestrian routes, dropped kerbs and crossing points with associated tactile paving."

This aligns with the [Lifetime Neighbourhoods](#) principles, which combine civic and social processes with physical conditions to achieve the following outcomes:

- An environment that is accessible and inclusive, aesthetically pleasing and safe (in terms of both traffic and crime)
- A community that offers plenty of services, facilities and open space
- A strong social and civic fabric, including volunteering and informal networks

- A culture of consultation and user empowerment amongst decision makers
- A strong local identity and sense of place

We would like to see a stronger commitment to, and more detailed specification of, Lifetime Neighbourhoods in the Draft New London Plan. This could include more attention to the positive and holistic outcomes which can result from joined-up approaches to housing and communities. To release the full potential that accessible housing holds for disabled people it is crucially important to integrate accessibility and inclusion into social and commercial infrastructure, as well transport, ensuring services provide for a range of requirements.

Policy D5 Accessible Housing

We strongly welcome this entire policy, and are extremely supportive of the commitment in **Section A** to ensure that:

- 1) at least 10 per cent of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users
- 2) all other new build dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

However, 10% of M4 3 should not necessarily be the maximum target – based on levels of existing provision some Local Authorities may need to set a higher requirement and it would be helpful if this were reflected in the wording of the policy.

We would also suggest that **change of use developments should be required to deliver minimum standards as well as new developments**. We understand that around 10% of London's new homes have been generated through office to residential conversions, however they are currently not required to meet the same regulations as other new homes. This seems a wasted opportunity to deliver accessible dwellings in buildings that may well have highly suitable infrastructure such as lift access, level thresholds and suitable approaches.

Section 3.5.3 aims to ensure that "all potential residents have choice within a development" through the distribution of M4(3) dwellings throughout a development to provide a range of aspects, floor level locations, views and unit sizes.

We welcome this approach, rather than planning all wheelchair units on the ground floor. However, boroughs are reporting that many disabled people decline flats above ground floor level where there is only one lift. We would therefore recommend that the policy requires the provision of two lifts where at all possible, and/or alternative access to secondary lifts, as well as access to a 24 hour lift breakdown call out service as a minimum.

Policy H1 Increasing Housing Supply

Section 4.1.4 sets out that:

In particular, the **London Housing Strategy** sets out the Mayor's proposals for working with boroughs and other partners to deliver the step change in housing supply required, through:

- **proactive intervention in London's land market** to unlock and accelerate housing delivery, including on public land and through compulsory purchase and other forms of land assembly
- **increased and better-targeted investment** to de-risk development and maximise opportunities from new transport infrastructure
- **diversification of the housebuilding industry** through increased Build to Rent development, more support for small and medium-sized builders, and more supply from councils and housing associations
- **tackling the construction skills gap** and modernising construction methods.

We welcome diversification of the housebuilding industry through increased build to rent development and support for small and medium-sized builders, councils and housing associations. As disclosed in our response to the Draft London Housing Strategy, Habinteg would be keen to explore opportunities for development of new accessible housing – both Category 2 and Category 3 – should land become available. As a smaller provider we are particularly interested to hear of opportunities for smaller/infill sites such as those which may be coming forward as part of the TFL land release.

Habinteg's response to the Draft London Housing Strategy welcomed the specific attention to access and inclusion and endorsed the acknowledgement of the requirements of older and disabled people in London within the Strategy as a whole.

We strongly welcome the in-depth consideration of the impact of the requirements of people with protected characteristics included within both the Draft New London Plan and the Draft London Housing Strategy, as this is a key means of responding to the needs of London's diverse population.

Policy H14 Supported and specialised accommodation

This policy concerns the supporting of the delivery, retention and refurbishment of supported and specialised housing which meets an identified need. **Section A** states: "The form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of London's population, including disabled Londoners", and points 1–8 include specific reference to groups with protected characteristics and heightened need.

We welcome this policy, as well as **Policy H15 Specialist older persons housing**, wherein **Section A** 1-3, **Section B** 1-5 and **Section C** refer specifically to accessible housing policies and relevant additional requirements.

These should also be referred to in Policy H14, including required percentages of M(4) Category 2 & Category 3 homes which are often overlooked, particularly in light of disabled people who require additional support or for whom living independently is not possible. Boroughs should be encouraged to plan these housing types based on local need.

At Habinteg, we know that accessible, adaptable housing is better for everyone and that the benefits of inclusive design are experienced by a range of people. Therefore, inclusively designed properties are attractive to a wide range of people, not just older and disabled people.

As stated in Habinteg's response to the Draft London Housing Strategy; specialist housing is only a small part of the solution to meeting the housing requirements of older and disabled people. Research from the Centre for Ageing Better shows that only 7% of older people live in specialised housing, therefore a large part of the solution to the housing requirements of older and disabled people must lie within mainstream housing¹. Consequentially, it is crucially important to ensure all Boroughs deliver to Category 2 in all general housing stock and we are pleased to see the London Plan set the context for this to happen.

Conclusion

In conclusion, we strongly welcome the clear commitment to accessibility and inclusive design in the Draft New London Plan. However, we would like to see this commitment expanded to include Lifetime Neighbourhoods principles in order to work towards the creating of genuinely inclusive and diverse communities.

We strongly support the inclusion of Part M4(2) as the default standard for all new homes in London, and would like to see this extended to cover office to residential conversions.

We also welcome the commitment to diversifying the housebuilding industry, and Habinteg would be interested in opportunities to play an active role in this.

¹ <https://www.ageing-better.org.uk/news/future-proofing-homes-neighbourhoods/>